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Environmental Assessment

Levelock to Dillingham Fiber Optic Cable Installation Project
Levelock, Ekwok, Aleknagik, and Dillingham, Alaska

The Levelock to Dillingham Fiber Optic Cable Installation Project will extend a fiber optic cable approximately 77 miles from Levelock, Alaska to Aleknagik, and an additional 40 miles of fiber to the home in the Dillingham and Aleknagik service areas.

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ACRONYMS

AHRS	Alaska Heritage Resource Survey
ANICLA	Alaska National Interest Lands Conservation Act
ANSCA	Alaska Native Claims Settlement Act
APE	Area of Potential Affect
AWC	Anadromous Water Code
CWA	Clean Water Act
DEC	Alaska Department of Environmental Conservation
DNR	Alaska Department of Natural Resources
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FTTH	Fiber to the Home
FTTP	Fiber to the Premises
FOC	Fiber Optic Cable
HFC	Hybrid Fiber Coax
IPaC	Information for Planning and Consultation
NAAQS	National Ambient Air Quality Standards
NETC	Nushagak Electric & Telephone Cooperative, Inc.
NHPA	National Historic Preservation Act
NPL	National Priorities List
NTIA	National Telecommunications and Information Administration
NWP	Nationwide Permit
SHPO	State Historic Preservation Office
SRB&A	Stephen R. Braund & Associates
SWPPP	Storm Water Pollution Prevention Plan
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
WSS	Web Soil Survey

1.0 EXECUTIVE SUMMARY

The purpose of the proposed project is to install new fiber optic cable (FOC) to connect 944 unserved Alaska Native households. The project will construct a 77-mile middle-mile fiber network from Levelock, Alaska to Aleknagik. It will also install a 40-mile last-mile network to directly connect homes within the Aleknagik and Dillingham service areas. This project is needed to connect unserved Alaska Native households to qualifying service of 100 megabits per second or greater.

Considering the remote nature of this project, a multitude of alternatives were not considered for the FOC routing as the middle-mile communities (Levelock, Ekwok, and Aleknagik) are not currently connected. Therefore, only two alternatives were investigated, the Preferred Action and the No Action Alternatives.

The proposed route crosses mostly open space and undeveloped public and private lands. Work within the Aleknagik and Dillingham service areas was considered for aerial or underground installation with a majority of work in this area ultimately chosen for aerial installation along existing telephone lines. The timing of installation (winter or summer) was considered for the middle-mile section of the project. Due to the many anadromous streams present and the brief time between smolt out migration and spawning fish arrival, there is insufficient time to allow for summer installation of this section of the project. Thus, the FOC will be installed during the winter season.

Construction of the proposed project will primarily be done via underground burial from Levelock to Aleknagik and Aleknagik to Dillingham. Underground installation from Levelock to Aleknagik of the fiber optic cable will include a temporary surface disturbance of 14-feet that includes clearing and FOC installation between 18 to 24 inches deep in a six-inch wide trench. From Aleknagik to Dillingham underground installation will include a temporary surface disturbance of 10-14 feet that includes clearing and FOC installation between 42 to 48 inches deep in a 18-24-inch-wide trench. The proposed action also includes 40 miles of fiber to the home connections in Aleknagik and along Aleknagik Lake Road. Approximately 10 percent of connections will require buried installation. For buried connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, fiber to the home service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. Areas of aerial installation will be completed using existing power poles and completing minor upgrades as needed.

The results of the Environmental Assessment indicate that the Proposed Action would not result in any significant adverse effects to the natural, cultural, or human environment. The findings are summarized in the table below.

Table 1: Effect Comparison of Alternatives

Resource Area	Proposed Action Alternative	No Action Alternative
Noise	Short term impacts during construction would be temporary and minor. No Significant Impacts.	No Impacts
Air Quality	Short term impacts during construction would be temporary and minor, including fugitive dust emissions from vehicular movement and facility construction. No Significant Impacts.	No Impacts
Geology and Soils	Minimal impact to soils during the plow burial operations and directional bore installation of the cable. No Significant Impacts.	No Impacts
Water Resources	FOC construction results in primarily temporary impacts to wetlands and no loss in functional value. Permanent impacts to wetlands will occur where splice vaults are required. The effects are within the limitations set under Nationwide 57 requiring no greater than one-half acre loss of waters of the United States. An application for a Section 404 permit with authorization under Nationwide 57 is currently under review for the Levelock fiber hut to Aleknagik (middle mile) and Aleknagik to Dillingham sections. No Significant Impacts.	No Impacts
Biological Resources	Due to the remote nature of this project, horizontal directional drilling cannot be utilized throughout the entirety of the project. A permit from the Alaska Department of Fish and Game has been issued for the Levelock fiber hut to Aleknagik (middle mile) section. No other biological resources will be impacted by the proposed action. No Significant Impacts.	No Impacts
Historic and Cultural Resources	A Finding of No Adverse Effect has been received from the State Historic Preservation Office. Impacts to subsistence are anticipated to be temporary. No Significant Impacts.	No Impacts
Aesthetic and Visual Resources	While construction impacts will be temporary and minor, no alterations will occur to the landscape that would result in any adverse impacts to the visual landscape and aesthetic quality of the region. No Significant Impacts.	No Impacts
Land Use	While construction impacts will be temporary and minor, the project will not result in any long-term impacts or changes to the current land use of the area. No Impacts.	No Impacts
Infrastructure	The project is in southwest Alaska in a largely roadless wilderness connected by remote villages. The project will overall provide a beneficial enhancement to the infrastructure of this region. No Significant Impacts.	The unserved/underserved communities would continue to lack access to broadband infrastructure. Significant Impacts.
Socioeconomic Resources	Beneficial impacts to socioeconomics will result in better communication capabilities and access to education resources, telemedicine and healthcare resources, and employment.	The unserved/underserved communities would continue to lack access to broadband infrastructure. Significant Impacts.
Human Health and Safety	The project is not located near any hazardous waste sites or sites listed on the National Priorities List. Human safety is enhanced by improving navigational aids and medical services.	No improvement to human safety and medical care.

2.0 PURPOSE AND NEED

The purpose of the proposed project is to install new fiber optic cable (FOC) to connect 944 unserved Alaska Native households. The project will construct a 77-mile middle-mile fiber network from Levelock, Alaska to Aleknagik. It will also install a 40-mile last-mile network to directly connect homes within the Aleknagik and Dillingham service areas. This project is needed to connect unserved Alaska Native households to qualifying service of 100 megabits per second or greater.

3.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

3.1 INTRODUCTION

The Levelock to Dillingham FOC Installation Project is in southwest Alaska in the Dillingham Census Area and the Lake and Peninsula Borough. Currently, Nushagak Electric & Telephone Cooperative, Inc. (NETC) provides telecommunication services to the remote villages of Dillingham and Aleknagik. The existing outside plant network infrastructure consists of a combination of hybrid fiber coax (HFC) in the Dillingham area, and copper twisted pair in Aleknagik. External connections to the public telephone network and internet are currently satellite-based via an AT&T earth station located in Dillingham, as well as a microwave connection via GCI's TERRA microwave network. These connections interface with network equipment at the Dillingham central office and are then routed to NETC's facility for local service distribution in Dillingham via the HFC system. Another feed is sent to Aleknagik for local service distribution. The Dillingham HFC network consists of fiber optic fed nodes and coax distribution. Several essential community facilities in Dillingham are served via FOC. The existing NETC middle mile capacity is 1.6 gigabit per second. Existing digital subscriber line and data over cable service interface specification service platforms provide up to 10-megabit per second speed with a 300-gigabit per month data cap.

3.2 PROPOSED ACTION (Preferred Alternative)

3.2.1 Construction

The project will install a mainline FOC extending 77 miles from Levelock to Aleknagik and an additional 40 miles of fiber to the Dillingham and Aleknagik service areas (Figures 1 and 2). The proposed route will include a regeneration site in Ekwok, Alaska.

The project has been broken up into four segments based on permitting needs:

- The Levelock section between the community of Levelock and a fiber hut approximately 5 miles to the north;
- Levelock fiber hut to Aleknagik (also known as the middle mile);
- Aleknagik Fiber to the home; and
- Aleknagik to Dillingham including fiber to the home.



Figure 1: Project Location



Figure 2: Aleknagik Fiber To The Home

Construction from Levelock to Ekwok to Aleknagik will primarily be done via underground burial. Underground installation of the FOC will include a temporary surface disturbance of 14-feet where a hydro-ax or other similar equipment will be used to clear vegetation, if needed, along the route. Following clearing, installation will consist of direct burial using a tracked cable plow or other similar equipment, inside a 10-foot work zone that allows equipment and manpower to install the FOC 18-24 inches deep in a six-inch wide trench. Construction is anticipated to occur primarily in the winter east of the Wood River. Summer construction is anticipated at the Nushagak and Wood River crossings and between Aleknagik and Dillingham.

The proposed action also includes 40 miles of fiber to the home connections in Aleknagik and along Aleknagik Lake Road. Approximately 10 percent of connections will require buried installation. For buried connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, Fiber to the Home (FTTH) service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12-18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner.

Installation between Aleknagik and Dillingham will be completed through a combination of buried and overhead cable. This section of the project will be installed via underground burial for 13 miles from Aleknagik to Waskey Road in Dillingham and aerial installation along existing power poles for seven miles to the end of project. Buried installation will include a temporary surface disturbance of 10-14 feet that includes clearing and FOC installation between 42- 48 inches deep in an 18-24-inch-wide trench. The Aleknagik to Dillingham installation will be completed within existing right-of-way. Much of the route will require clearing of second-growth vegetation along the previously disturbed and cleared route which will precede aerial or buried installation. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel or linemen climbing the poles if terrain issues are present. Figures depicting the FOC alignment are included in Appendix A.

3.2.2 Internet Upgrades

Optical line terminal nodes will provide Fiber-To-The-Premise (FTTP) services in the village of Aleknagik and surrounding area. The FTTP service will primarily utilize gigabit passive optical network technology with the option of active ethernet FTTP technology if required. In Dillingham, a new fiber optic backhaul connection will enable the existing Arris/Commscope E6000 HFC system, which is currently constrained by microwave and satellite-based backhaul, to provide high speed internet services within the village.

The high-capacity fiber middle mile build will bring 100 gigabit per second capacity to the villages. This additional middle mile capacity will allow for further development to other surrounding areas and villages, development of WiFi, commercial internet service provider and various other services. The FTTP and data over cable service interface specification upgrades will allow for greater than 100 megabit per second package speeds with unlimited data, speeds ten times faster than current service!

3.3 NO ACTION ALTERNATIVE

The No Action Alternative would result in no upgrades to the existing telecommunications infrastructure. If no action is taken, these remote communities would not receive vital urban quality internet service. No construction impacts or benefits (i.e., improved navigational aids, medical services, and business opportunities) described in Section 3.2 would occur.

3.4 ALTERNATIVES CONSIDERED

3.4.1 Routing

Considering the remote nature of this project, a multitude of alternatives were not considered for the FOC routing because the middle-mile communities (Levelock, Ekwok, and Aleknagik) are not currently connected. The proposed route crosses mostly open space and undeveloped public and private lands. Most of the FOC in the Aleknagik and Dillingham service areas was considered for aerial or underground installation with a majority of work in this area ultimately chosen for aerial installation along existing telephone lines. The proposed route considered avoidance of resources and constructability issues, but, at the same time, took the most direct route possible. This approach reduced the amount of land and resources that could be impacted by construction.

3.4.2 Timing

The timing of construction (winter or summer) was considered for the buried installation between Levelock and Aleknagik. Due to the many anadromous streams present and the brief time between smolt out migration and spawning fish arrival, there was insufficient time to allow for summer installation of the Levelock to Aleknagik section of the project. The work between these communities will almost exclusively be completed during winter. Winter construction will also minimize the impacts to vegetation and tundra.

4.0 DESCRIPTION OF THE AFFECTED ENVIRONMENT

The following sections describe the environmental setting of the Proposed Project.

4.1 NOISE

The project area is primarily within undeveloped forested or shrub areas between unconnected rural communities. The project crosses areas defined by the U.S. Environmental Protection Agency (EPA) as farm and general unpopulated land including wilderness areas, parks, game refuges, and other areas that are set aside to provide enjoyment of the outdoors.¹ The primary considerations for these areas are the protection of human hearing and prevention of adverse effects on domestic and wild animals. The natural ambient noise levels of the project area are quiet, within the 10 to 20 decibel levels.

4.2 AIR QUALITY

The Clean Air Act requires the EPA to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants, carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide. Areas with pollutant levels above the NAAQS are considered non-attainment areas.

¹ *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare With an Adequate Margin of Safety*. United States Environmental Protection Agency, Office of Noise Abatement and Control. <https://nepis.epa.gov/Exe/ZyPDF.cgi/2000L3LN.PDF?Dockey=2000L3LN.PDF>

The Clean Air Act and state law in Title 44, Chapter 46, and Title 46, Chapter 3 and Chapter 14 establish the duties of the Alaska Department of Environmental Conservation (DEC) Division of Air Quality for controlling and mitigating air pollution and for conserving the clean air that is enjoyed in most locations of Alaska.

Information available through the Division of Air Quality indicates that rural Alaska air quality concerns are related to particulate matter from wood smoke and dust.^{2,3} According to the EPA Green Book Nonattainment Areas for Criteria Pollutants, the communities of Dillingham, Aleknagik, Ekwok, and Levelock are not located within non-attainment areas.⁴

4.3 GEOLOGY AND SOILS

The physiographic region of the project is within the Alaska Intermontane Plateau System, Bering Shelf Province, Ahklun Mountains Province (IP36) and Western Alaska Province, Nushagak-Bristol Bay Lowland Section (IP32).^{5,6}

Multiple soil types are located within the project area. The United States Department of Agriculture (USDA) Web Soil Survey (WSS) was consulted to identify soil types within the project area.⁷ Looking at a 100-foot corridor surrounding the FOC, the following soils are predominant:

- Levelock to Ekwok: The WSS does not fully provide information for this route. Of the area with coverage, the predominant soil type is D36PNB, Western Maritime Eolian Plains, Very Wet.
- Ekwok to Dillingham: The predominant soil type is 3701, Okstukuk-Typic Haplocryods complex, 0 to 8 percent slopes.

To meet the Nation's short- and long-term needs for food, the U.S. Department of Agriculture recognizes that responsible levels of government, as well as individuals, should encourage and facilitate the wise use of our Nation's prime or unique farmland.⁷ Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses.⁷ Unique farmland is land other than prime farmland that is used for the production of specific high-value food and fiber crops (citrus, tree nuts, olives, cranberries, and other fruits and vegetables).⁷

WSS documentation detailing soils and farmland are provided in Appendix B. There are no prime and unique farmlands within the project area.

² State of Alaska Division of Air Quality Air Non-Point & Mobile Sources. Rural Alaska Wood Smoke Webpage. Accessed via: <https://dec.alaska.gov/air/anpms/communities/pm2-5-rural/>

³ State of Alaska Division of Air Quality Air Non-Point & Mobile Sources. Rural Alaska Dust Webpage. Accessed via: <https://dec.alaska.gov/air/anpms/communities/pm10-rural/>

⁴ U.S. Environmental Protection Agency. **Nonattainment Areas for Criteria Pollutants (Green Book)**. Updated as of May 31, 2023. Accessed via <https://www.epa.gov/green-book>

⁵ *Physiographic Divisions of Alaska*. U.S. Geology Survey Professional Paper No. 482. Wahrhaftig, Clyde.

⁶ *Field Book for Describing and Sampling Soils (Version 2.0 as updated through 2010)*. United States Department of Agriculture, Soil Survey Staff. Government Printing Office, Washington, D.C., 250 pages.

⁷ Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. **Web Soil Survey**. Accessed via: <http://websoilsurvey.sc.egov.usda.gov/>

4.4 **WATER RESOURCES**

The project contains many types of water resources, which are outlined in the following sections.

4.4.1 **Surface Water (i.e., Lakes and Rivers)**

The project is located within the Bristol Bay Region and will cross multiple waterbodies including the following anadromous waters:⁸

- Lower Klutuk Creek
 - Anadromous Water Code (AWC):325-30-10100-2112, Species: Coho Salmon, Chinook Salmon, Pink Salmon
- Nushagak River
 - AWC: 325-30-10100, Species: Chum Salmon, Coho Salmon, Chinook Salmon, Pink Salmon, Sockeye Salmon, Arctic Char, Rainbow Smelt, Whitefish
- Klutuk Creek
 - AWC: 325-30-10100-2141, Species: Chum Salmon, Coho Salmon, Chinook Salmon, Sockeye Salmon, Arctic Char
- Kokwok River
 - AWC: 325-30-10100-2129, Species: Chum Salmon, Coho Salmon, Chinook Salmon, Pink Salmon, Sockeye Salmon, Arctic Char
- Koklong Creek
 - AWC: 325-30-10100-2121, Species: Chum Salmon, Coho Salmon, Chinook Salmon
- Iowithla River
 - AWC: 325-30-10100-2101, Species: Chum Salmon, Coho Salmon, Chinook Salmon, Pink Salmon, Sockeye Salmon, Arctic Char
- Muklung River
 - AWC: 325-30-10100-2031-3028, Species: Chum Salmon, Coho Salmon, Chinook Salmon, Pink Salmon, Sockeye Salmon, Arctic Char
- Unnamed Creek
 - AWC: 325-30-10100-2031-3054-4010, Species: Chum Salmon, Sockeye Salmon
- Arcana Creek
 - AWC: 325-30-10100-2031-3054, Species: Chum Salmon, Coho Salmon, Pink Salmon, Sockeye Salmon
- Wood River
 - AWC: 325-30-10100-2031, Species; Chum Salmon, Coho Salmon, Chinook Salmon, Pink Salmon, Sockeye Salmon, Arctic Char, Whitefish
- Silver Salmon Creek
 - AWC: 325-30-10100-2031-3051, Species: Coho Salmon
- Unnamed Creek
 - AWC: 325-30-101002031-3039-4202, Species: Coho Salmon
- Belt Creek
 - AWC: 325-30-10100-2031-3029, Species: Coho Salmon
- Scandinavian Creek
 - AWC: 325-30-10100-2025, Species: Coho Salmon, Chinook Salmon

⁸ Alaska Department of Fish and Game. **Anadromous Waters Catalog**. Accessed via: <https://experience.arcgis.com/experience/1a4eb07b42ff4ebb8c71ba45adaedf0c/>

Multiple other unnamed waterbodies are also present within the area. Mapping depicting the location of anadromous waters within the project area is included in Appendix C.

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the Secretary of the Army, acting through the United States Army Corps of Engineers (USACE), for the construction of any structure in or over any navigable water of the United States. The navigable waters in the project area regulated under Section 10 of the Rivers and Harbors Act include⁹:

- Nushagak River from mouth of Wood River 34 miles;
- Wood River for 24 miles on river;
- Kvichak River, entire length; and
- Waters which are subject to the ebb and flow of the tide are also considered navigable.

Average ground elevations at stream crossings range from 70 feet to 400 feet above sea level. The 1938 United States Department of the Interior Bulletin 903 titled “The Nushagak District Alaska” identifies that “The effect of the tides, however, is recognized on the Nushagak River as far upstream as Keefer Cutoff. Similarly, in the Wood River the tides are apparent as far upstream as the lower end of Lake Aleknagik...¹⁰” The Keefer cutoff is described as the eastern of the two channels the Nushagak River flows into approximately 17 miles south of Ekwok at the northernmost end. Based on this information, none of the streams crossed by the project above the Kieffer cutoff are subject to the ebb and flow of the tide and are therefore not Section 10 Waters.

4.4.2 Groundwater

The DEC Drinking Water Protection Areas map shows no community water systems in Ekwok or Levelock, one non-transient non-community water system within Aleknagik, and one community water system, one non-transient non-community water system, and one non-community water system in Dillingham.¹¹ Maps depicting drinking water protection areas are included in Appendix C.

Based on information contained in the Exploratory Survey of Alaska, groundwater is generally precluded by the presence of shallow permafrost. Areas surrounding Levelock especially near rivers and streams have the potential for shallow groundwater (i.e., less than 10 feet deep).¹²

4.4.3 Coastal Zone, Estuary, and Inter-tidal Areas

The Coastal Zone Management Act encourages coastal states to develop comprehensive management programs to balance competing uses of and impacts to coastal resources, Alaska voluntarily withdrew from the participation in 2011.¹³

⁹ United States Army Corps of Engineers Alaska District Website. **Navigable Waters of Alaska**. Accessed via: [Alaska District > Missions > Regulatory > Recognizing Wetlands > Navigable Waters \(army.mil\)](#)

¹⁰ Mertie Jr., John Beaver, 1938. **The Nushagak District, Alaska**. USGS Publications Warehouse, Bulletin 903. Accessed via: <https://pubs.usgs.gov/publication/b903>

¹¹ Alaska Department of Environmental Conservation. **Drinking Water Source Protection Areas Map**. Accessed via: <https://dec.alaska.gov/eh/dw/dwp/protection-areas-map/>

¹² Rieger et. al., 1979. **Exploratory Soil Survey of Alaska**. Samuel Rieger, Dale Schoephorster, Clarence Furbush. United States Department of Agriculture, Soil Conservation Service. 213 pages.

¹³ U.S. Department of Commerce, National Oceanic Atmospheric Administration “Alaska Coastal Management Program Withdrawal From the National Coastal Management Program Under the Coastal Zone Management Act (CZMA).” Federal Register Vol. 76, Pg. 39857 (July 7, 2011)

4.4.4 Flood Plains

Flood insurance rate maps from the Federal Emergency Management Agency (FEMA) Flood Map Service Center were consulted to identify flood hazard levels for communities along the cable route including Dillingham, Aleknagik, Ekwok, and Levelock.¹⁴ Given the remote nature of this project between rural Alaskan communities, flood mapping data was generally unavailable outside Dillingham. All areas within or near Aleknagik, Ekwok, or Levelock are unmapped and therefore fall under a Zone D classification which is defined as an area where the flood hazard is undetermined and usually very sparsely populated.¹⁵

Within the Dillingham area, multiple floodplains are located along the Nushagak River including:

- Zone A6: Areas subject to inundation by the 1-percent-annual-chance flood event determined by detailed methods.
- Zone C: Areas of minimal flood hazards outside 0.2-percent-annual-chance floodplain.
- Zone D: Areas with possible but undetermined flood risk. No analysis of flood hazards has been conducted in these areas.

FEMA Flood Insurance Rate Maps for the area are included in Appendix C.

4.4.5 Wild and Scenic Rivers

Within Alaska there are 3,210 miles of designated Wild, Scenic, and Recreational rivers, less than one percent of the state's river miles. The largest rivers crossed by the project are the Nushagak and Wood Rivers and are not designated as Wild, Scenic, or Recreational rivers.¹⁶

4.5 BIOLOGICAL RESOURCES

The project consists of proposed FOC installation within mostly undeveloped forested or shrub areas between otherwise unconnected rural communities.

4.5.1 Threatened and Endangered Species and Critical Habitat

The United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool has been consulted to determine potential impacts to threatened or endangered species and critical habitats.¹⁷ No threatened or endangered species or critical habitat were listed by IPaC within 100 feet of the FOC alignment between Levelock and Aleknagik. One endangered species, the Steller's Eider, multiple migratory birds, and no critical habitats were identified in the section between Aleknagik and Dillingham. The Steller's Eider is a sea duck that breeds inland but generally spends the remainder of the year in coastal marine waters.¹⁸ Based on the Cornell eBird tool, a tool recommended for use in the documentation from the IPaC Consultation which compiles information on exact locations where birders and the general public have sighted birds, no

¹⁴ Federal Emergency Management Agency. **FEMA Flood Map Service Center**. Accessed via: <https://msc.fema.gov/portal/home>

¹⁵ Federal Emergency Management Agency. National Flood Insurance Program, Flood Insurance Manual. Effective April 1, 2021.

¹⁶ National Wild and Scenic Rivers (NWSR) Alaska Map. Accessed via: <https://www.rivers.gov/alaska.php>

¹⁷ U.S. Fish and Wildlife Service. **Information for Planning and Consultation (IPaC)**. Accessed via: <https://ipac.ecosphere.fws.gov/>.

¹⁸ Steller's Eider Species Profile. Alaska Department of Fish and Game. Accessed via <https://www.adfg.alaska.gov/index.cfm?adfg=stellerseider.main>

sightings of the Steller's Eider near Dillingham have ever been recorded.¹⁹ IPaC documentation is included in Appendix D.

The Proposed Action will work in conformance with the Migratory Bird Treaty Act, particularly as it relates to disturbance of vegetation during the nesting periods of migratory birds. Much of the Proposed Action will be constructed in the wintertime thus minimizing contact with migratory birds.

Likewise, the Proposed Action will comply with the National Bald Eagle Management Guidelines. Aerial reconnaissance during the route selection and engineering phase of this project did not note any Bald Eagle nests along the proposed construction corridor. The typical terrain and vegetation features where Bald Eagles commonly nest were not found along much of this project. The landscape consisted primarily of low shrubs and open terrain and was not adjacent to coastlines or large rivers.

4.5.2 Wetland Habitats

TempTel and Nushagak Cooperative contracted 3-Tier Alaska (DBA Travis/Peterson Environmental Consulting) to delineate wetlands. The project will obtain coverage under the USACE Alaska Division Nationwide Permit (NWP) 57 which authorizes discharges of dredged or fill material into waters of the United States and structures or work in navigable waters for crossings of those waters associated with the construction, maintenance, or repair of electric utility lines and telecommunication lines. Wetland permitting will be completed for the Levelock to Aleknagik and Aleknagik to Dillingham sections of the project. All other sections will not impact wetlands.

Largely, impacts to wetlands will be temporary and directly related to the installation of the fiber optic cable. Permanent impacts to small wetland areas will occur in locations where splice vaults are required within wetland areas.

4.6 HISTORIC AND CULTURAL RESOURCES

Stephen R. Braund and Associates (SRB&A) conducted a review of the project in accordance with Section 106 of the National Historic Preservation Act (NHPA). The area of potential effect (APE) for the project consisted of a 100-foot-wide corridor where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable.

The March 2022 Cultural Resource Field Survey Report for Nushagak Cooperative's Proposed Nushagak Fiber Project summarized work conducted from Levelock to Aleknagik and within the FTTH connections of Aleknagik. In August of 2023, SRB&A also evaluated revisions to the project design including the portion of the project between Wood River and Aleknagik Lake Road, buried installation between Aleknagik and Dillingham along Aleknagik Lake Road, and from the Levelock hut to the community of Levelock. Survey reports from SRB&A and the State Historic Preservation Office (SHPO) concurrence letters are included in Appendix E.

¹⁹ eBird, 2023. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Available: <http://www.ebird.org>. (Accessed: June 15, 2023).

4.6.1 Archaeological and Architectural Resources

SRB&A conducted a literature review to identify previously documented cultural, archaeological, and historic sites and determine the extent and results of previous cultural resource survey efforts within the study area. SRB&A utilized multiple sources to gather information to identify cultural resources including.

- The Alaska Department of Natural Resources, Office of History and Archaeology, Integrated Business Suite, Alaska Heritage Resource Survey (AHRS) database
- Interviews and workshops conducted with residents who have knowledge regarding cultural resources associated with their communities and region;
- Review of indigenous place names;
- Evaluation of the environmental setting to identify areas with environmental characteristics that may have attracted past human use and occupancy; and
- Other sources available including academic papers, reports, journal articles, and other historic records.

Thirteen indigenous place names intersect, or are near, the APE. These place names include five villages/sites, five waterways, one lake, and two mountain/hill locations. In past projects in the region, SRB&A conducted cultural resource interviews to document cultural resources that are important to local communities. For the Nushagak Fiber Project, four interview identified cultural resources intersect with the proposed APE and include three trails between the communities of Levelock, New Stuyahok, and Ekwok and one place name that represents the community of Ekwok. Only two previously documented AHRS sites intersects with the APE for the Project. These sites consist of the historic and modern villages of Ekwok (AHRS number DIL-00009) and Levelock (DIL-00017). Three additional sites (DIL-00008, DIL-00064, and DIL-00169) are located just outside the APE but have larger historic and archaeological components and are only represented by points.

In 2022, SRB&A conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. SRB&A recommended a finding of no effect to the site which received concurrence from SHPO on April 26, 2022.

Finally, windshield and pedestrian survey in September 2023 of the FOC route in Aleknagik, along Aleknagik Lake Road, and the five miles between the community of Levelock and the fiber hut was completed. DIL-00017 is the only documented site that intersects with the project alignment. SRB&A recommended a finding of no effect which received concurrence from SHPO on December 5, 2023. No new cultural resources or sites were identified during the windshield and pedestrian survey.

4.6.2 Native American Traditional, Cultural, or Religious Resources

The communities of Levelock, Ekwok, Aleknagik, and Dillingham are predominately native Alaskan Aleut/Alutiiq and Yup'ik. The region encompasses a great diversity of terrestrial, fresh water, marine, and wetland habitat types which support many valuable subsistence species. Among the most important subsistence land animals are caribou and moose, fish including all salmon species, white fish, and other resident species, and waterfowl. Nearly all edible animal species are used to add variety to customary diet or in times of scarcity. Berries and other wild plant foods are also extensively gathered for consumption. In addition to its economic importance, subsistence is essential in structuring and sustaining the regions cultural values and social organization. It sustains the important cultural practice of cooperative food gathering and food sharing. Subsistence hunting and gathering is a strong positive thematic value that binds families, communities, and the regional people together as a distinctive social group. Subsistence use includes both consumptive (i.e., for food), non-consumptive uses (i.e., furs and hides for clothing), and cultural uses.

Nushagak Cooperative initiated consultation efforts with 12 tribal and local government entities on November 15, 2021, and with the SHPO on December 15, 2021, through letter/email correspondence and requested a description of any specific historic properties or important tribal resources in the APE and recommendations about the level of effort needed to identify additional historic properties which might be affected by the Project. Beginning the week of November 22, 2021, SRB&A conducted follow-up phone calls and email contacts with the Consulting Parties to request their input. Consulting parties did not identify any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise. Parties consulted are detailed in Table 7.

4.7 AESTHETIC AND VISUAL RESOURCES

Visual and aesthetic resources include features of both the built and natural environments that together comprise the visual landscape. Examples of visual and aesthetic resources include parks, natural areas, scenic features, open vistas, water bodies, and other landscape features. Cultural resources, such as historic landmarks and historic districts, can also be visual resources.

The proposed project is not located within the boundaries of any national or state parks, the Togiak National Wildlife Refuge is located 20 miles west of Dillingham.

4.8 LAND USE

The state of Alaska does not have traditional counties as in other states but rather 19 organized boroughs and one large unorganized borough. The areas within the larger unorganized borough are divided into census areas. Organized boroughs have an organized areawide government while census areas do not. Dillingham, Aleknagik, and Ekwok are within the Dillingham Census Area. Levelock is within the Lake and Peninsula Borough.

Alaska is unique in that it has a complex system of land ownership and management due to the various land laws such as the Native Allotment Act, the Alaska Statehood Act, the Alaska Native Claims Settlement act (ANSCA), and the Alaska National Interest Lands Conservation Act (ANICLA), and the 1978 Municipal Entitlement Act. Most Alaskan lands are within federal and

state ownership; however, under the aforementioned laws, Native Alaskans, Native regional and village corporations, boroughs, cities, and the state all have selected lands.

The Proposed Action will cross a mix of public, private, Regional Corporation, and Village Corporation lands. Coordination with regional and village corporations has been of the utmost importance throughout this project and the alignment of the project has been approved by such entities.

The State of Alaska Department of Natural Resources (DNR), Division of Mining, Lands & Water has received patent from the United States to approximately half of the lands crossed by this installation. An application for a Public Utility Easement has been submitted to the DNR for this project and has been approved by a Regional Managers Decision.

4.9 INFRASTRUCTURE

The project is in southwest Alaska in a largely roadless wilderness connected by remote villages. Access to the villages along the FOC alignment is most frequently done via air transport. Charter flights from Dillingham are available to access Levelock and Ekwok. Dillingham and Aleknagik are connected by road. Vehicles, all-terrain vehicles, and snow machines are used for local transportation.

Current telecommunications services are provided by NETC to Dillingham and Aleknagik. Currently, the existing outside plant network infrastructure consists of a combination of HFC in the Dillingham area, and copper twisted pair in Aleknagik. External connections to the public switched telephone network and Internet are currently satellite-based via an AT&T earth station located in Dillingham, as well as a microwave connection via GCI's TERRA microwave network (also in Dillingham). These connections interface with network equipment at the Dillingham central office and are then routed to NETC's head-end facility for local service distribution in Dillingham via the HFC system. Another feed is sent to Aleknagik for local service distribution. The Dillingham HFC network consists of fiber optic fed nodes and coax distribution. Several essential community facilities in Dillingham are served via fiber optic facilities. The existing NETC middle mile capacity is 1.6 gigabit per second. Existing digital subscriber line and data over cable service interface specification service platforms provide up to 10 megabit per second speed with a 300-gigabit per month data cap. No other forms of infrastructure are significant for the purposes of a fiber optic cable installation project.

4.10 SOCIOECONOMIC RESOURCES

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires that federal agencies, whenever practical and appropriate, maintain information of populations by race, national origin, or income and shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects.

The project is in a remote part of Alaska not accessible via roads where the population primarily consists of Alaska Natives including Aleut/Alutiiq and Yup'ik. The EPA Environmental Justice

Screening and Mapping Tool was consulted to look at the socioeconomic information for the area (Table 2).²⁰

Table 2: Socioeconomic Information

	Dillingham Census Area	Lake and Peninsula Borough
Population Density	Dillingham area is 13.5 people per square mile, remainder of census area 0.27 people per square mile	0.05 people per square mile
Demographics	16.54% White 1.5% Black 74.02% American Indian Population 3.02% Hispanic	24.31% White 6.92% Black 58.74% American Indian Population 0.26% Hispanic
Sex	51.22% Male 48.78% Female	45.85% Male 54.15% Female
Age	9.73% under the age of 5 31.25% under 18 68.75% over the age of 17 11.29% over the age of 64	7.27% under the age of 5 25.61% under 18 74.39% over the age of 17 10.55% over the age of 64
Education	40.14% has a high school diploma 13.54% some college without a degree 6.10% have an associate degree 8.51% have a bachelors degree 5.31% have a masters degree 2.41% have a doctorate degree	35.65% has a high school diploma 17.13% some college without a degree 6.13% have an associate degree 10.58% have a bachelors 7.80% have a masters degree 0% have a doctorate degree
Language	39.72% of the population speaks only English 35.23% of the population speak other language at home	79.78% of the population speaks only English 10.17% of the population speak other language at home
Economics	9.58% households earn <\$15,000 annually 10.70% earn \$15-25,000 24.27% earn \$25-50,000 18.04% earn \$50-75,000 37.41% earn more than \$75,000	10.11% households earn <\$15,000 annually 15.03% earn \$15-25,000 25.68% earn \$25-50,000 19.95% earn \$50-75,000 29.23% earn more than \$75,000
Property ownership	35.09% of properties are owner occupied 39.58% are renter occupied.	16.49% of properties are owner occupied 35.52% are renter occupied.

The results of the EJSCREEN report in the Dillingham Census Area showed the borough was ranked lower than both the state and USA average for all pollution and source variables (of those with reported values) including diesel particulate matter, air toxics cancer risk, air toxics respiratory HI, lead paint, superfund proximity, risk management program facility proximity, and underground storage tanks. The Dillingham Census Area has a higher demographic index, more people of color, lower income, higher unemployment rate, and more education than the state and USA averages.

For the Lake and Peninsula Borough, the borough ranked lower than both state and USA averages for all pollution and source variables (of those with reported values) except for lead paint which was higher than the state average. The Lake and Peninsula Borough also has higher demographic index, more people of color, lower income, higher unemployment rate, and equal or higher education than the state and USA averages.

²⁰ EPA, 2023. Environmental Justice Screening and Mapping Tool. Accessed via: <https://ejscreen.epa.gov/mapper/>

4.11 HUMAN HEALTH AND SAFETY

A review of the DEC Contaminated Sites Database on June 29, 2023, showed three contaminated sites within one hundred feet of the proposed fiber optic cable alignment:²¹

- DEC File Number 2510.38.004, Aleknagik School Day Tank, active status
 - Multiple historic releases were documented at aboveground tanks at the school. Initial site work was completed in June 2008 including the removal and land spreading of contaminated soils. Current site investigation is related to soil and surface water sampling near Aleknagik Lake, monitoring well sampling, and drinking water sampling. Contaminants are fuel based.
- DEC File Number 2510.38.001, Aleknagik Traditional Council Washateria, active status
 - Contaminated from historic releases of heating oil from an aboveground heating oil tank. Detections present in groundwater based on 2021 report.
- DEC File Number 2540.26.012, C & L Tesoro, active status
 - Contamination discovered while removing gasoline underground tanks. Contaminants are fuel based. Site characterization is not fully complete, however, groundwater and soil investigation anticipated.

The above sites are in areas where overhead installation along existing utility poles is planned in Aleknagik and Dillingham. During project implementation, all fuels, solvents, construction adhesives, and other hazardous materials will be stored at least 100 feet away from waterways, used as directed by the contractor, and disposed of, if needed, at a permitted facility that specializes in hazardous waste. Database maps and contaminated site reports are included in Appendix F.

There are six National Priority List (NPL) sites within the state of Alaska according to the EPA. No sites are located near the project.²²

Two largest risks to residents of remote Alaska villages are air travel and lack of access to medical services. Inclement weather causes airplane crashes and kills people. Many times, a pilot will not know the current weather conditions at a village. Bad weather can trap a pilot and cause the person to fly into terrain.

Telemedicine in villages is need for nurses and technicians to access doctors in Dillingham and Anchorage. Village health staff are often called upon to stabilize trauma victims before medivac flights can reach the village. Doctor consultations can improve basic medical examinations.

5.0 ANALYSIS OF ENVIRONMENTAL IMPACTS

5.1 NOISE

The proposed action will have short term noise impacts from construction equipment (snow machines, four wheelers, D-4, Ditch Witch RT115, or similar cable plow, mini excavator, Hydro-Axe) which will occur during fiber optic cable installation. These temporary impacts will affect small portions of the project at one time. Workers will follow applicable hearing protection

²¹ Alaska Department of Environmental Conservation. **Contaminated Sites Database and Map**. Accessed via: <https://www.arcgis.com/apps/mapviewer/index.html?webmap=315240bf84aa0b8272ad1cef3cad3>

²² EPA, 2023a. Environmental Protection Agency National Priorities Lists (NPL) Sites – by State. Accessed via: <https://www.epa.gov/superfund/national-priorities-list-npl-sites-state#AK>

requirements. No long-term changes to the noise environment will occur. Noise impacts from the Proposed Action are not considered to be significant.

Under the No Action Alternative, no temporary noise impacts will occur.

5.2 AIR QUALITY

The proposed action will consist of both winter and summer construction. Summer construction would potentially generate dust as well as emissions from construction vehicles. Winter installation will not generate dust. Impacts from dust will be addressed as a part of the Storm Water Pollution Prevention Plan (SWPPP) and best management practices like dust suppression will be utilized as necessary. Air quality impacts are temporary and not considered to be significant.

Under the No Action Alternative, no impacts would occur to air quality.

5.3 GEOLOGY AND SOILS

The proposed FOC installation from Levelock to Aleknagik will occur within undisturbed forested or wetland areas. Installation between Aleknagik and Dillingham will primarily be completed within existing right of way. Construction of the FOC will require clearing of a 14-foot work zone, however, grubbing will not be done. The FOC installation will be within a six-inch wide, 18-24 inch deep trench from Levelock to Aleknagik and within a 18-24 inch wide, 42-48 inch deep trench from Aleknagik to Dillingham. Installation will be done in accordance with the requirements of the Alaska Construction General Permit. A SWPPP will address needs to prevent soil erosion and sedimentation using best management practices.

The project includes temporary disturbance to allow installation of the FOC and will not convert land to a use that will prohibit that land from potentially being farmed in the future. The USDA WSS has been consulted to determine whether the project will cross lands identified as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland.²³ There are no prime or unique farmland within the project area. A vast majority of map units did not have a rating, mapped units with a rating were located between Dillingham and Aleknagik and were classified as follows:

- Map Unit 3701, Okstukuk-Typic Haplocryods complex, 0 to 8 percent slopes, rated not prime farmland.

Aerial installation within Aleknagik and from Waskey Road to the heart of Dillingham will be completed using existing utility poles and although minor upgrades may be needed, there will be no impacts to geology. Overall, impacts to geology and soil will be temporary and not considered to be significant.

Under the No Action Alternative, no impacts would occur to geology and soils.

5.4 WATER RESOURCES

Work along the coast in Dillingham will be completed via aerial installation which will not affect coastal zones, estuaries, inter-tidal areas, or floodplains. No Wild, Scenic and Recreational

²³ Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. **Web Soil Survey**. Accessed via: <http://websoilsurvey.sc.egov.usda.gov/>

designated rivers are present within the project area. The FOC will be installed to a maximum depth of 48 inches which will not encounter groundwater. The following sections discuss impacts to specific water resources.

5.4.1 Anadromous Waterbodies

Anadromous waterbodies and the method by which they will be crossed are detailed in Table 3 below.

Table 3: Anadromous Waterbodies

Waterbody Name	Installation Method
Lower Klutuk Creek	Plow
Nushagak River	Directional Drilling
Klutuk Creek	Directional Drilling
Kokwok River	Plow
Koklong Creek	Plow
Iowithla River	Plow
Muklung River	Plow
Unnamed Creek	Plow
Arcana Creek	Plow
Wood River	Directional Drilling
Silver Salmon Creek	Directional Drilling
Unnamed Creek	Directional Drilling
Belt Creek	Directional Drilling
Scandanavian Creek	No impact - aerial

Directional drilling will avoid all impacts to stream channels. This method of installation requires digging a bore pit on either side of the stream, which to the extent practical will be dug within upland areas. The cable will run under the stream and associated riparian wetlands. Native vegetation will not be disturbed for a minimum of 25 feet from the stream edge and the bore will be installed 10 feet below the stream scour. This work is anticipated to be completed during the summer and is dependent upon ability to barge a drill rig to the area.

Installation through waterbodies by plowing will be done by direct burial with a subsea armored cable during frozen periods of the season (December 1 to March 30). Exact installation methodology will be dependent upon the presence of ice or water at the time of the crossing. Fish habitat permitting by the Alaska Department of Fish and Game has been completed. A copy of the permit is included in Appendix C.

A SWPPP will address preventing soil erosion and sedimentation using best management practices near waterbodies.

Impacts to water resources from the construction of the Proposed Action are temporary and not considered to be significant.

Under the No Action Alternative, no impacts would occur to water resources.

5.4.2 Section 10 Waters

Section 10 waters crossed by the project include the Wood and Nushagak Rivers as well as other tidally influenced waterways. All waters that may be influenced by the tide including the Unnamed Creek in Levelock, Nushagak River in Ekwook, and Silver Salmon Creek, Unnamed Creek, and Belt Creek along Aleknagik Lake Road will all be crossed by directional drilling. Scandanavian Creek in Dillingham will be crossed aerially via existing telephone lines. No impacts to Section 10 waters will occur by completing the Proposed Action or the No Action Alternative.

5.5 BIOLOGICAL RESOURCES

5.5.1 Threatened and Endangered Species; Critical or Threatened / Endangered Habitat

The USFWS IPaC tool identified the Steller's eider a having potential to occur within the project area.²⁴ Based on the Cornell eBird tool, no sightings of the Steller's eider near Dillingham have ever been recorded.²⁵ Additionally, no critical habitat are present within the project area. A review of the USFWS Bald Eagle Nest Sites does not indicate the presence of any bald eagle nests within 660 feet of the proposed FOC route.²⁶ Documentation is included in Appendix D.

No impacts to threatened and endangered species or their habitats will occur by completing the Proposed Action or implementing the No Action Alternative.

5.5.2 Wetland Habitats

The Proposed Action has been broken up into four smaller segments for evaluation:

- Levelock work between the community of Levelock and a fiber hut approximately five miles to the north which will not require permitting as no wetlands or anadromous waters will be crossed and all waterbodies will be bored;
- Levelock to Aleknagik;
- Aleknagik FTTH which will not require permitting because it is mostly aerial installation on existing utility poles with minimal underground installation which will not cross wetlands based potential on customer sign-ups; and
- Aleknagik to Dillingham.

Levelock to Aleknagik

3-Tier Alaska delineated wetlands along the Levelock to Aleknagik section and is now negotiating the wetland fill permit. The Proposed Action has sought coverage under the USACE Alaska Division NWP 57 which authorizes discharges of dredged or fill material into waters of the United States and structures or work in navigable waters for crossings of those waters associated with the construction, maintenance, or repair of electric utility lines and telecommunication lines.

²⁴ U.S. Fish and Wildlife Service. **Information for Planning and Consultation (IPaC)**. Accessed via: <https://ipac.ecosphere.fws.gov/>.

²⁵ eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Available: <http://www.ebird.org>. (Accessed: June 15, 2023).

²⁶ U.S. Fish and Wildlife Service. **Alaska Bald Eagle Nest Sites**. Updated as of May 8, 2019. Accessed via: <https://gis.data.alaska.gov/maps/d0be8220447747f2bb25e43a36513482/about>

To date, 3-Tier Alaska completed a preliminary Jurisdictional Determination Report to delineate wetlands within 100 feet of the FOC alignment between the Levelock fiber hut and Aleknagik in support of the USACE permit application. 3-Tier Alaska relied upon a combination of available soils and wetland data to support the primarily visual delineation of wetlands. 3-Tier Alaska also received Fodar for the alignment completed in 2020 by Fairbanks Fodar (Fodar is defined by the company as a portmanteau of ‘foto’ and ‘lidar’) which included high resolution photography and digital elevation model data all georeferenced for use in a geographic information system program.

FOC construction will result in temporary impacts to wetlands and no loss in functional value. No wetland acreage will be filled *per se*. Rather, a 14-foot width will be cleared and work will be completed in a 10-foot-wide work zone that allows equipment and manpower to install the FOC. The actual cable is installed 18-24 inches deep in a six-inch-wide trench. The project involves the temporary displacement of native soils in wetlands to allow cable installation. Directional boring will be done at the Nushagak River, Klutuk Creek, and Wood River as detailed in Section 5.4.1.

Permanent small impacts to wetlands will occur where splice vaults are required. Splice vaults have an overall footprint of 52 sq. ft, with a "void" area in the middle (which is the vault itself, not fill) of 10 sq. ft, which would add up to 42 sq. ft. of gravel fill. The total permanent disturbance of wetlands attributable to splice vaults will not result in the loss of greater than one-half acre of waters of the United States in any portion of the project which is consistent with the limitation set under NWP 57.

Aleknagik to Dillingham

FOC installation between Aleknagik and Dillingham will be completed using a combination of buried and aerial installation. Buried installation will be done primarily along Aleknagik Lake Road and at some FTTH connections. Aerial installation will be done at a majority of FTTH connections and from the intersection of Aleknagik Lake Road and Waskey Road into the community of Dillingham.

FOC construction will result in no impacts to wetlands between Aleknagik and Dillingham. In upland areas clearing will consist of a minimum 10-14 foot zone to allow equipment and manpower to install the fiber optic cable 42-48 inches deep in a 18-24 inch wide trench. To avoid impacts to waterbodies and wetlands, horizontal directional drilling will be utilized. Directional drilling will require the digging of a bore pit on either side of the wetland in an upland area and the boring installed cable conduit will span the entire wetland area. Additionally, directional drilling will be done at Silver Slamon Creek, Belt Creek, and an Unnamed Creek as detailed in Section 5.4.1.

Installation activities between Aleknagik and Dillingham are included in the USACE permit application.

Construction Impacts

Work within wetlands will include clearing as necessary. Long term maintenance of the right-of-way is not anticipated, and wetlands will be allowed to return to their original state. Emergent wetlands are anticipated to fully recover within one or two growing seasons, scrub-shrub areas within five years following disturbance, and forested areas are expected to recover to at least a

scrub shrub stage within five years. The recovery of tree species will be dependent upon the life cycle of the tree species impacted.

The Proposed Alternative does not significantly affect wetlands. These effects are primarily temporary and are within the limitations set under NWP 57 requiring no greater than one-half acre loss of waters of the United States. Additionally, a SWPPP will address preventing soil erosion and sedimentation using best management practices near wetlands. An application for a Section 404 permit with authorization under NWP 57 is currently under review for the Levelock fiber hut to Aleknagik (middle mile) and Aleknagik to Dillingham sections. Once authorized, the proposed project must comply with all General, Regional, Special, or Case-Specific Conditions imposed by the Corps district office under NWP 57.

Under the No Action Alternative, no impacts would occur to wetland resources.

5.5.2.1 Clean Water Act Section 401 Water Quality Certification

In accordance with Section 401 of the Clean Water Act (CWA), any applicant for a federal license or permit to conduct an activity that might result in a discharge into waters of the U.S. must also apply for and obtain certification from the DEC that the discharge will comply with the CWA, the Alaska Water Quality Standards, and other applicable State laws. Nationwide permits are a form of general permit issued by the USACE. The NWPs are reviewed by the DEC and they issued the Section 401 water quality certification for the permit. Section 401 Certification was most recently issued for the NWPs in December 2020. Therefore, once approved, project authorization under NWP 57 will provide the proposed project with Section 401 water quality certification.

5.6 HISTORIC AND CULTURAL RESOURCES

As discussed in Section 4.6, there are several cultural resource sites that could potentially be impacted by the proposed Project. In 2022, SRB&A recommended a finding of “No Adverse Effect” for the proposed Nushagak Fiber Project conditioned on several actions that the Project proponent must enact to minimize the potential for the Project to cause adverse effects to historic properties. Table 4 provides a summary of known sites and SRB&A’s recommendations to avoid effects to documented sites as well as areas of archaeological concern due to high potential for encountering undocumented cultural resources.

Table 4: Summary of Historic and Cultural Resource Findings

Identified Site	General Location	SRB&A Recommendations
DIL-00008	North Bank of Wood River	Archaeological monitoring for all ground disturbing activities within 500 ft.
DIL-00009	Historic Village of Ekwok	Alignment of FOC will follow the existing road network and will not adversely affect the site.
DIL-00017	Historic Village of Levelock	Alignment of FOC will follow the existing road network and will not adversely affect the site.

Identified Site	General Location	SRB&A Recommendations
DIL-00064	South Bank of Wood River	Archaeological monitoring for all ground disturbing activities within 500 ft.
DIL-00169	South Shore of Lake Aleknagik	Archaeological monitoring for all ground disturbing activities within 500 ft.
DIL-00267	East Bank of Wood River	Horizontal directional drilling to avoid the identified site.
Areas of Archaeological Concern	West bank of Nushagak River and Shore of Lake Aleknagik	Archaeological monitoring for all ground disturbing activities within 500 ft.

SRB&A also recommended cultural resource awareness training, administered by SRB&A, with construction personnel which will be completed prior to the commencement of construction activities. The proposed project will utilize an Unanticipated Discovery Plan during monitoring and construction and stop work if archaeological materials or human remains are discovered. The Plan will address the procedures necessary and agencies that would need to be contacted, as appropriate, in order to resume work in the case of a discovery.

SHPO concurred with the conditional “No Adverse Effect” on April 26, 2022 and subsequently reviewed supplemental information and found that a finding of No Adverse Effect is still appropriate on December 5, 2023.

5.6.1 Subsistence

The Proposed Action will temporarily impact the following subsistence resources:

- Vegetation within the project corridor;
- Overwintering fish at stream crossings; and
- Resident caribou and moose populations during active construction.

Except for vegetation clearing, the above impacts are transitory as the cable is installed at a rate of approximately three miles per day. Vegetation clearing will be a longer-term temporary impact especially within forested upland areas. Emergent areas are anticipated to fully recover within one or two growing seasons, scrub-shrub areas within five years following disturbance, and forested areas are expected to recover to at least a scrub shrub stage within five years. The recovery of tree species will be dependent upon the life cycle of the tree species impacted.

The Proposed Action will not impact waterfowl. All clearing will be completed outside the recommended migratory bird window to avoid nesting birds.

Under the No Action Alternative, no temporary or permanent impacts will occur to subsistence.

5.7 AESTHETIC AND VISUAL RESOURCES

Within the region where the FOC will be installed, there are no aesthetic or visual resources of importance that would be affected by the proposed action type. No impacts to aesthetic and visual resources will occur by constructing the Proposed Action or as a part of the No Action Alternative.

5.8 LAND USE

The Proposed Action and No Action Alternative will not affect land use or underlying ownership.

5.9 INFRASTRUCTURE

The Proposed Action will complete minor upgrades to utility poles as needed and will overall provide a beneficial enhancement to the infrastructure of this region through the improved broadband access.

The No Action Alternative will significantly impact the unserved/underserved communities which would continue to lack access to broadband infrastructure.

5.10 SOCIOECONOMIC RESOURCES

The Proposed Action does not adversely affect low income or minority populations. Choggiung Limited, Nushagak Cooperative, and TempTel have taken steps to consult with affected communities and individuals to best route the FOC through private and native-owned lands. The Proposed Action is not anticipated to adversely affect human health or the environment. The primary disturbance is to the land surface that will be cleared; however, grubbing will not occur thus preserving topsoil to best support regrowth. Long term maintenance of the right of way is not anticipated.

The Proposed Action will bring access to high-speed broadband to a traditionally unserved/underserved region made up of primarily minority populations, providing access to telemedicine, distance learning, online business opportunities, and more.

The No Action Alternative will significantly impact the unserved/underserved communities which would continue to lack access to broadband infrastructure.

5.11 HUMAN HEALTH AND SAFETY

Two largest risks to residents of remote Alaska villages are air travel and lack of access to medical services. The proposed project will increase resident safety and health. Reliable high-speed internet will allow pilots to access webcams and automated weather stations at village airports to assess meteorological conditions before flying to the area. Real-time weather information allows pilots to make informed decision to fly or not to fly.

High-speed internet allows village nurses and technicians to access doctors in Dillingham and Anchorage. Village health staff can stabilize trauma victims before medivac flights can reach the village. Doctor consultations can improve basic medical examinations.

There are no contaminated sites or NPL listed sites within or near the project area that could affect human health and safety. Construction is not anticipated to encounter contamination. The provisions of the SWPPP and associated Hazardous Materials Control Plan will be followed in the event contamination is encountered.

5.12 CUMULATIVE AND SECONDARY IMPACTS

Cumulative impacts take into consideration the Proposed Action and how it may be additive or that interact with existing conditions or planned activities not specifically related to the project and

not addressed in other sections. There are no known existing conditions or planned activities within the region of this scale.

Secondary impacts are project effects that are separated by time and location from the project area. The Proposed Action will prevent some future aircraft accidents and promote better medical care. These are positive secondary impacts.

The No Build Alternative will ensure the status quo for air travel safety in the project region and the current substandard medical care. These are negative secondary impacts.

6.0 APPLICABLE ENVIRONMENTAL PERMITS AND REGULATORY REQUIREMENTS

Table 5: Environmental Permits and Regulatory Requirements

Regulation	Project Information / Applicability
All Resources	
National Environmental Policy Act (NEPA) of 1969 42 U.S.C. § 4321 et seq.	NEPA EA and associated public involvement procedures are underway.
Vegetation, Wildlife, and Fish	
Endangered Species Act of 1973 16 U.S.C. § 1531 et seq.	The project will have no effect on Threatened or Endangered Species.
Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) of 1976 16 U.S.C. 1801 et seq.	Consideration of the Magnuson-Stevens Act has been accomplished in coordination with the Alaska Department of Fish and Game who has permitted work in anadromous and resident fish waterbodies within the middle-mile section of the project area.
Bald Eagle and Golden Eagle Protection Act (Eagle Act) of 1940 16 U.S.C. § 668-668d	In areas where clearing is required, clearing will be done outside the recommendations from the United States Fish and Wildlife Service Land Clearing Timing Guidance for Alaska (Appendix D). If clearing is required within the recommended period, appropriate measures will be taken.
Migratory Bird Treaty Act (MBTA) of 1918 16 U.S.C. § 703-712 Responsibilities to Federal Agencies to Protect Migratory Birds Executive Order 13186	In areas where clearing is required, clearing will be done outside the recommendations from the United States Fish and Wildlife Service Land Clearing Timing Guidance for Alaska (Appendix D). If clearing is required within the recommended period, appropriate measures will be taken.
AS Title 16 Chapter 5 Section 871 Fish and Wildlife Coordination Act 16 U.S.C. § 661 et seq.	Permitting through the Alaska Department of Fish and Game for the middle mile section is complete. No additional permitting is required.

Regulation	Project Information / Applicability
Waters, Wetlands, and Floodplain Protection	
Clean Water Act 33 U.S.C. § 1251 et seq. Floodplain/Wetlands Environmental Review Requirements 10 CFR 1022.12 Floodplain Management Executive Order 11988 Protection of Wetlands Executive Order 11990	An application for a Section 404 permit with authorization under Nationwide 57 is currently under review for the Levelock fiber hut to Aleknagik (middle mile) and Aleknagik to Dillingham sections.
Coastal Zone Management Act 16 U.S.C. § 1451 et seq.	Alaska voluntarily withdrew from the participation in 2011.
Air Quality and Greenhouse Gases	
The Clean Air Act, as revised in 1990 42 U.S.C. § 4701	The project does not require any air permits.
Final Mandatory Reporting of Greenhouse Gases Rule 40 CFR 98 Federal Leadership in Environmental, Energy, and Economic Performance Executive Order 13514	The project does not require any air permits.
Cultural and Historic Resources	
Antiquities Act of 1906 16 U.S.C. § 431-433 Historic Sites Act of 1935 16 U.S.C. § 461-467 National Historic Preservation Act (NHPA), as amended, inclusive of Section 106 54 U.S.C. § 306108 et seq. Archaeological Data Preservation Act of 1974 (16 U.S.C. § 469 – 469-1) Archaeological Resources Protection Act of 1979, as amended 16 U.S.C. § 469 a-c Native American Graves Protection and Repatriation Act 25 U.S.C. § 3001 et seq. Indian Sacred Sites Executive Order 13007 American Indian Religious Freedom Act of 1978 (42 U.S.C. § 1996)	A Finding of No Adverse Effect has been issued for the entire project. Qualified cultural resource personnel will be available throughout construction. Cultural resource awareness training will be incorporated into the training programs of all construction personnel or contractors prior to the commencement of construction activities.

Regulation	Project Information / Applicability
Noise, Public Health, and Safety	
Noise Control Act of 1972 42 U.S.C. § 4901 et seq.	Construction work in areas near communities will be done during normal daily working hours. There are no local noise ordinances or permitting.
Spill Prevention Control and Countermeasures Rule 40 CFR 112 Comprehensive Environmental Response, Compensation, and Liability Act 42 U.S.C. § 9601 et seq. Resource Conservation and Recovery Act 42 U.S.C. § 6901 et seq. The Toxic Substances Control Act 15 U.S.C. 2601 et seq.	Construction is not anticipated to encounter contamination. The provisions of the Storm Water Pollution Prevention Plan and associate Hazardous Materials Control Plan will be followed in the event contamination is encountered. A Spill Prevention Control and Countermeasure Plan will be prepared for the project if aboveground oil storage will be greater than 1,320 gallons.
Environmental Justice	
Environmental Justice	No additional requirements apply to the project for Environmental Justice. Impacts are anticipated to benefit underserved rural communities.
State, County, and Local Plan Consistency	
NPDES Permit	A Storm Water Pollution Prevention Plan will be developed for the project and coverage sought under the Alaska Pollutant Discharge Elimination System General permit for Discharges from Large and Small Construction Activities, Permit No. AKR100000

7.0 CONSULTATIONS

Table 6: Agency Consultations

Agency and Name/Title	Consultation	Status
State Historic Preservation Office Judith E. Bittner State Historic Preservation Officer	Section 106 Historic Preservation Consultation	SHPO Finding of No Adverse Effect received 4/26/2022. Review of supplemental information Finding of No Adverse Effect received 12/5/2023.
Alaska Department of Fish and Game Andrew Kastning Habitat Biologist	Fish Habitat Permitting	Permit issued for the middle mile section. No additional permitting required.
United States Army Corps of Engineers Stephen Moore Project Manager	Wetland Permitting	Ongoing for Levelock to Aleknagik and Aleknagik to Dillingham sections. No additional permitting required.

Agency and Name/Title	Consultation	Status
Alaska Department of Natural Resources Jay Rokos Easements Program Manager	Public Utility Easement	Permit issued.

As a part of the SHPO work for the middle mile section, Nushagak Cooperative contacted the Tribes detailed in Table 2 with an initial inquiry in November 2021 and a follow up notification of the Finding of No Adverse Effects for the project in March 2022.

Table 7: SHPO Tribal Consultations

Tribes	Contact Information	Response
Aleknagik Natives Ltd.	Lance Nunn, CEO PO Box 1630 Dillingham, Alaska 99576	No response
Aleknagik Traditional Council	Allen Ilutsik, Tribal Administrator PO Box 115 Aleknagik, Alaska 99555	No response
Bristol Bay Native Corporation	Franciaca Demoski, Lands Department 111 W. 16 th Ave, Suite 400 Anchorage, Alaska 99501	Verbal Responses in Agreement with Finding or not Expressing Cultural Concerns
City of Aleknagik	Kay Andrews, City Administrator PO Box 33 Aleknagik, Alaska 99555	Verbal Responses in Agreement with Finding or not Expressing Cultural Concerns
City of Dillingham	Cynthia Rogers, Planning Director PO Box 889 Dillingham, Alaska 99576	Letter Response in agreement with finding
City of Ekwok	Crystal Jensen, City Administrator PO Box 49 Ekwok, Alaska 99580	No Response
Choggiung, Ltd.	Mark Bielefeld, Land Manager PO Box 330 Dillingham, Alaska 99576	Verbal Responses in Agreement with Finding or not Expressing Cultural Concerns
Curyung Tribal Council	Desi Bond, Tribal Environmental Coord. PO Box 216 Dillingham, Alaska 99576	No response
Ekwok Village Council	Richard King, Tribal Administrator PO Box 70 Ekwok, Alaska 99580	Verbal Responses in Agreement with Finding or not Expressing Cultural Concerns
Ekwok Natives Ltd.	Luki Akelkok, President PO Box 29 Ekwok, Alaska 99580	Verbal Responses in Agreement with Finding or not Expressing Cultural Concerns
Levelock Village Council	Alexander Tallekpalek, President PO Box 70 Levelock, Alaska 99625	No Response
Levelock Natives Ltd.	Alexander Tallekpalek, President PO Box 109 Levelock, Alaska 99625	No Response

8.0 LIST OF PREPARERS

3 – Tier Alaska

Edmond C. Packee, Jr. PhD, Senior Scientist

Michael Travis, P.E., Principal

Jessica Knowles, Staff Engineer

TempTel, LLC.

Steven Wells, Senior OSP Engineering Foreman

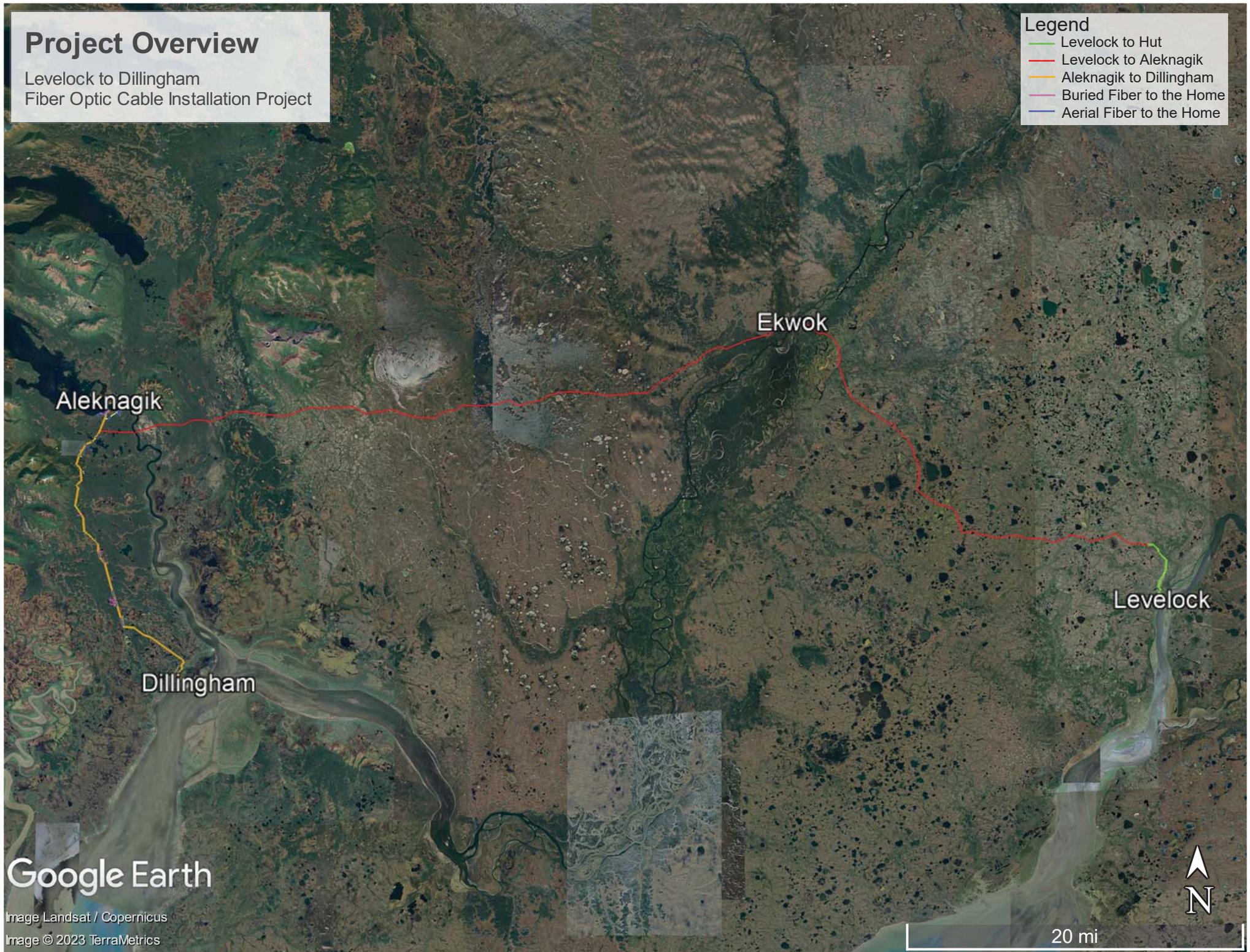
Stephen R. Braund & Associates

Appendix A
Figures

Project Overview

Levelock to Dillingham
Fiber Optic Cable Installation Project

- Legend**
- Levelock to Hut
 - Levelock to Aleknagik
 - Aleknagik to Dillingham
 - Buried Fiber to the Home
 - Aerial Fiber to the Home



Google Earth

Image Landsat / Copernicus
Image © 2023 TerraMetrics

20 mi



Levelock

Tower to Tower Fiber

Tower

GCI Levelock Hut

Levelock

Google Earth

Image © 2023 Maxar Technologies

4000 ft





FILE: F:\NUSHAGAK\21-106 LEVELOCK DILLINGHAM\01-CADD\NATIVE CORPS\ALEKNAGIK TO LEVELOCK - (1).DWG I PLOT DATE: 6/30/2023 I PLOT SCALE: 1:1

LEGEND

NATIVE ALLOTMENT



NATIVE CORP. LAND
(AKDNR AND BLM
DATA SOURCE)



PROPOSED FOC ROUTE
(W/ROUTE MILE POINT)



**MIDDLE MILE TRANSPORT FIBER
ALEKNAGIK TO LEVELOCK**

MP 0 - MP 15

PROJECT NO: 21-106

ADDITIONAL INFO: MP 15-30

SCALE: 1" = 1 MILE DESIGNED BY: MSF

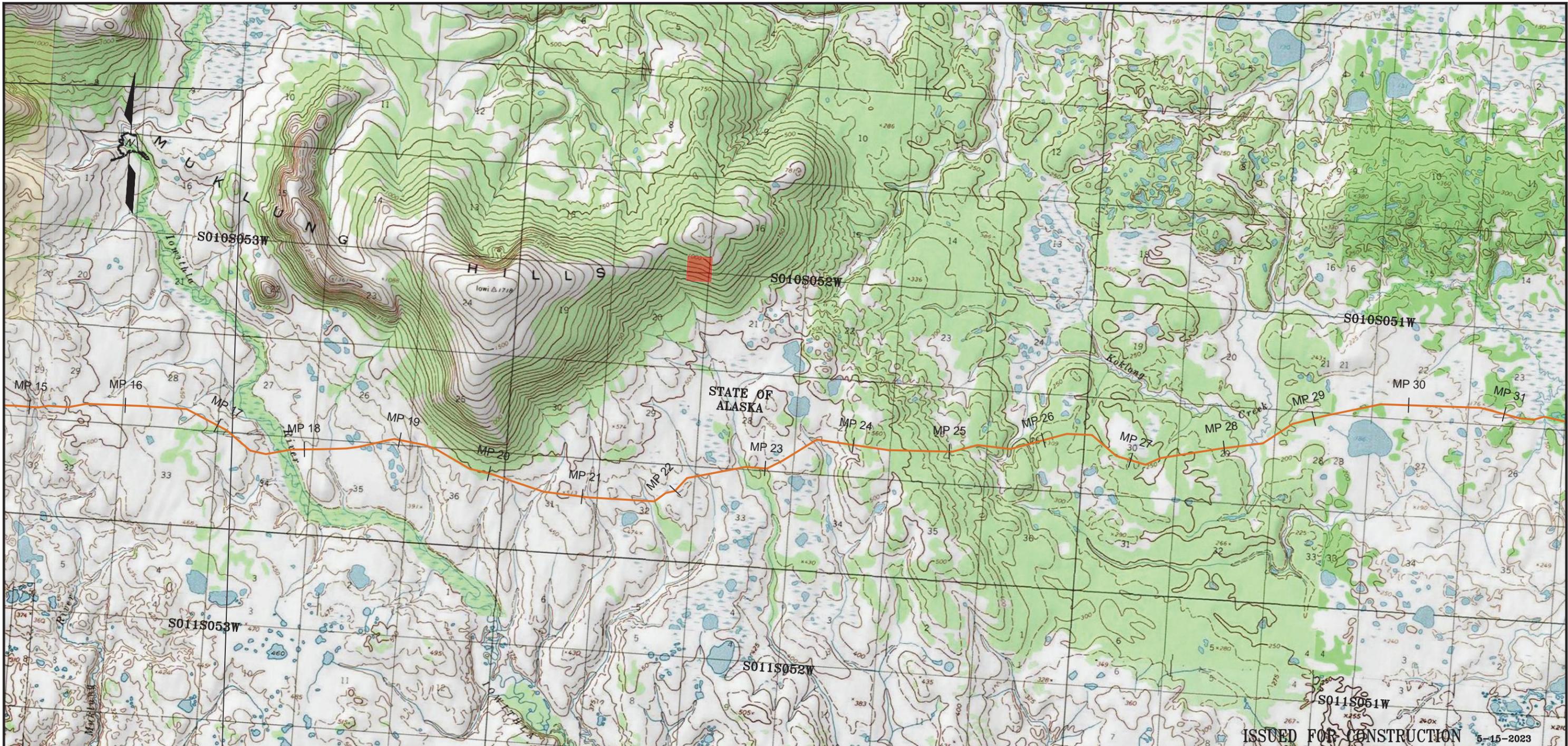
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NSH-01

SHEET: 7 OF 10

NO.	REVISION DESCRIPTIONS	DATE

ISSUED FOR CONSTRUCTION 5-15-2023



ISSUED FOR CONSTRUCTION 5-15-2023

LEGEND

NATIVE ALLOTMENT



NATIVE CORP. LAND
(AKDNR AND BLM
DATA SOURCE)



PROPOSED FOC ROUTE
(W/ROUTE MILE POINT)



**MIDDLE MILE TRANSPORT FIBER
ALEKNAGIK TO LEVELOCK**

MP 15 - MP 30

PROJECT NO: 21-106

ADDITIONAL INFO: MP 15-30

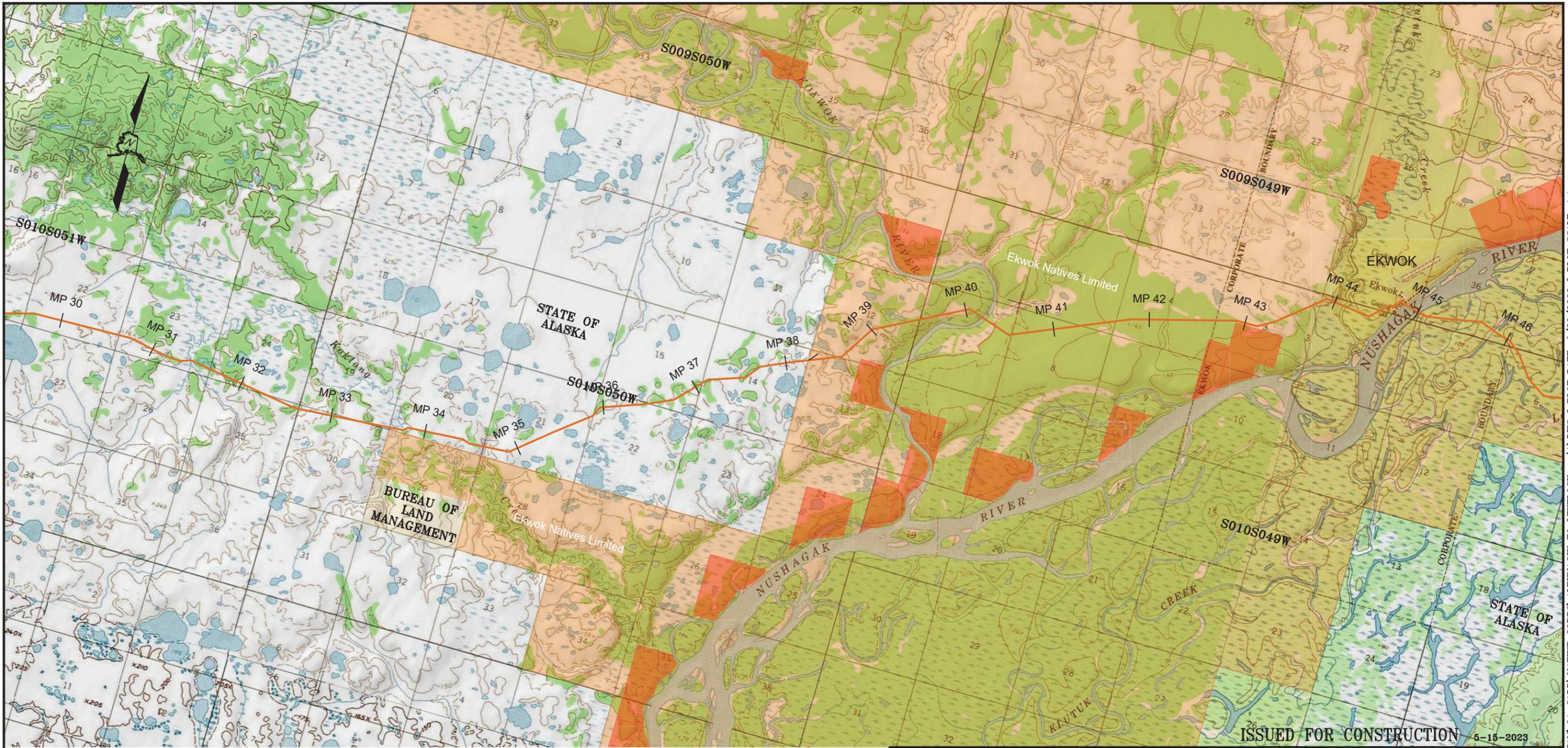
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DRAWN BY: MSF CHECKED BY: STW

NSH-02

SHEET: 8 OF 10

NO.	REVISION DESCRIPTIONS	DATE



LEGEND

NATIVE ALLOTMENT



NATIVE CORP. LAND
(AKDNR AND BLM
DATA SOURCE)



PROPOSED FOC ROUTE
(W/ROUTE MILE POINT)



**MIDDLE MILE TRANSPORT FIBER
ALEKNAGIK TO LEVELOCK**

MP 30 - MP 44

PROJECT NO: 21-106

ADDITIONAL INFO: MP 30-44

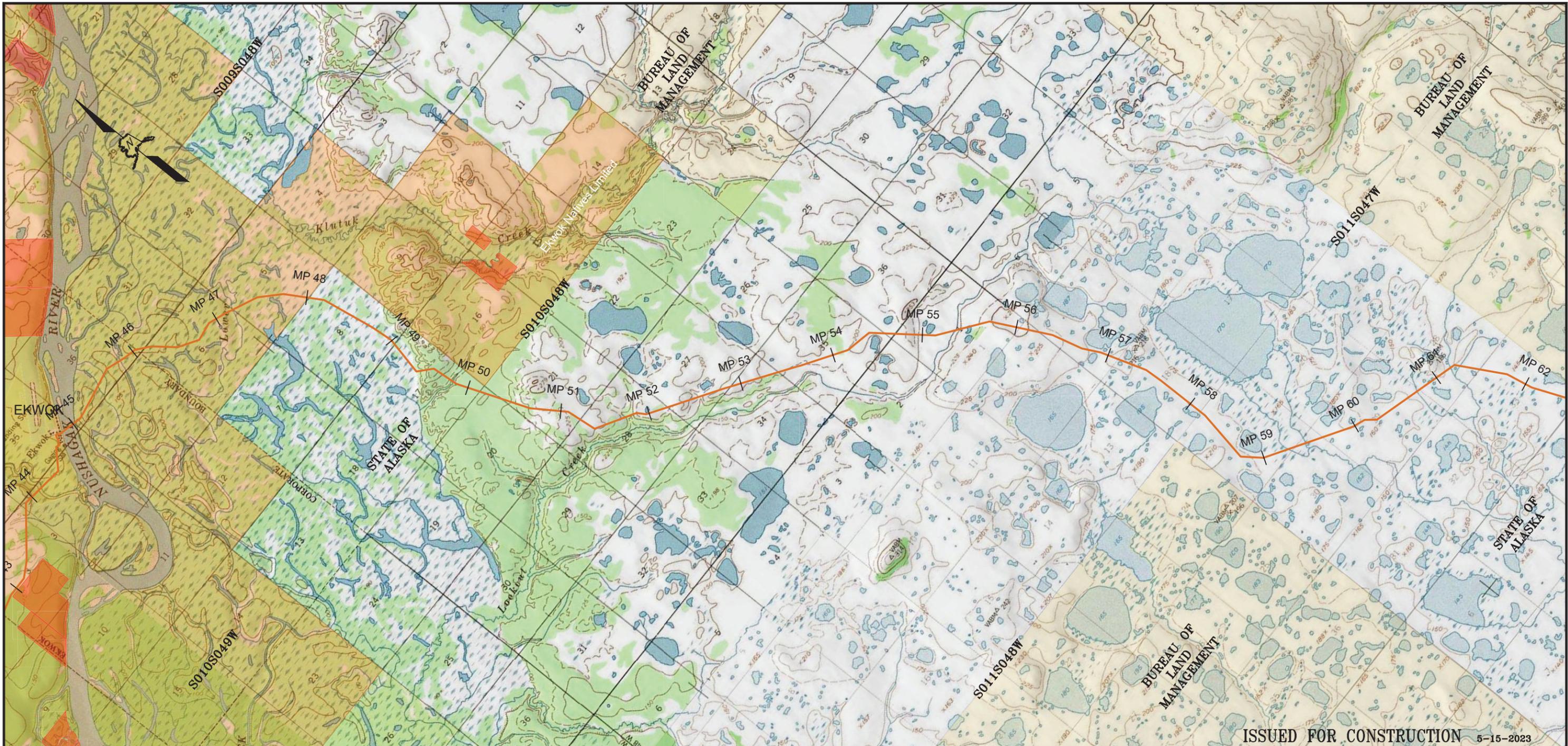
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DRAWN BY: MSF CHECKED BY: STW

NSH-03

SHEET: 9 OF 10

NO.	REVISION DESCRIPTIONS	DATE



ISSUED FOR CONSTRUCTION 5-15-2023

LEGEND

NATIVE ALLOTMENT



NATIVE CORP. LAND
(AKDNR AND BLM
DATA SOURCE)



PROPOSED FOC ROUTE
(W/ROUTE MILE POINT)



**MIDDLE MILE TRANSPORT FIBER
ALEKNAGIK TO LEVELOCK**

MP 44 EKWOK - MP 60

PROJECT NO: 21-106

ADDITIONAL INFO: MP 44-60

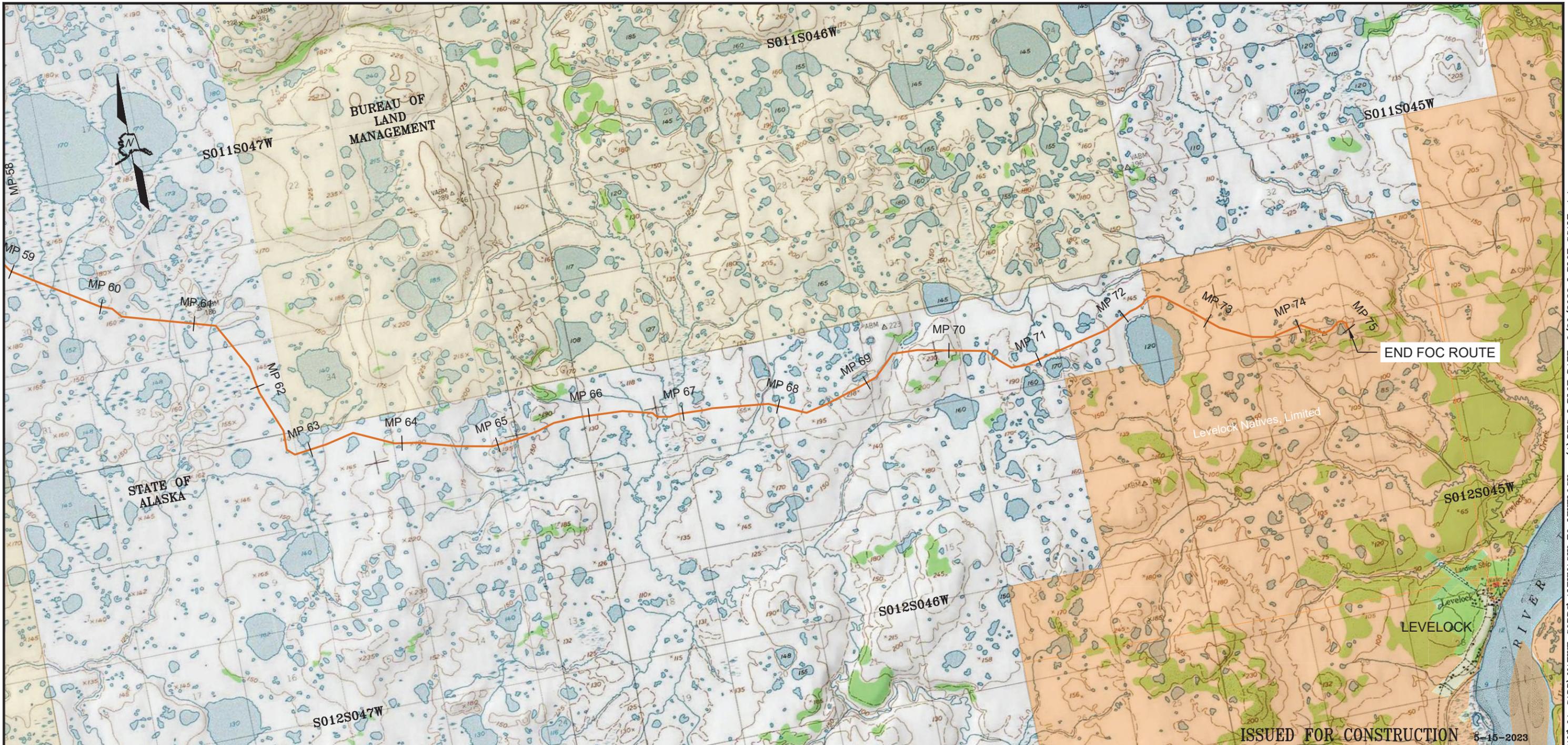
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DRAWN BY: MSF CHECKED BY: STW

NSH-04

SHEET: 10 OF 10

NO.	REVISION DESCRIPTIONS	DATE



LEGEND

NATIVE ALLOTMENT



NATIVE CORP. LAND
(AKDNR AND BLM
DATA SOURCE)



PROPOSED FOC ROUTE
(W/ROUTE MILE POINT)



**MIDDLE MILE TRANSPORT FIBER
ALEKNAGIK TO LEVELOCK**

MP 60 - END OF PROJECT

PROJECT NO: 21-106

ADDITIONAL INFO: MP 60-74

SCALE: 1" = 500' DESIGNED BY: MSF

DRAWN BY: MSF CHECKED BY: STW

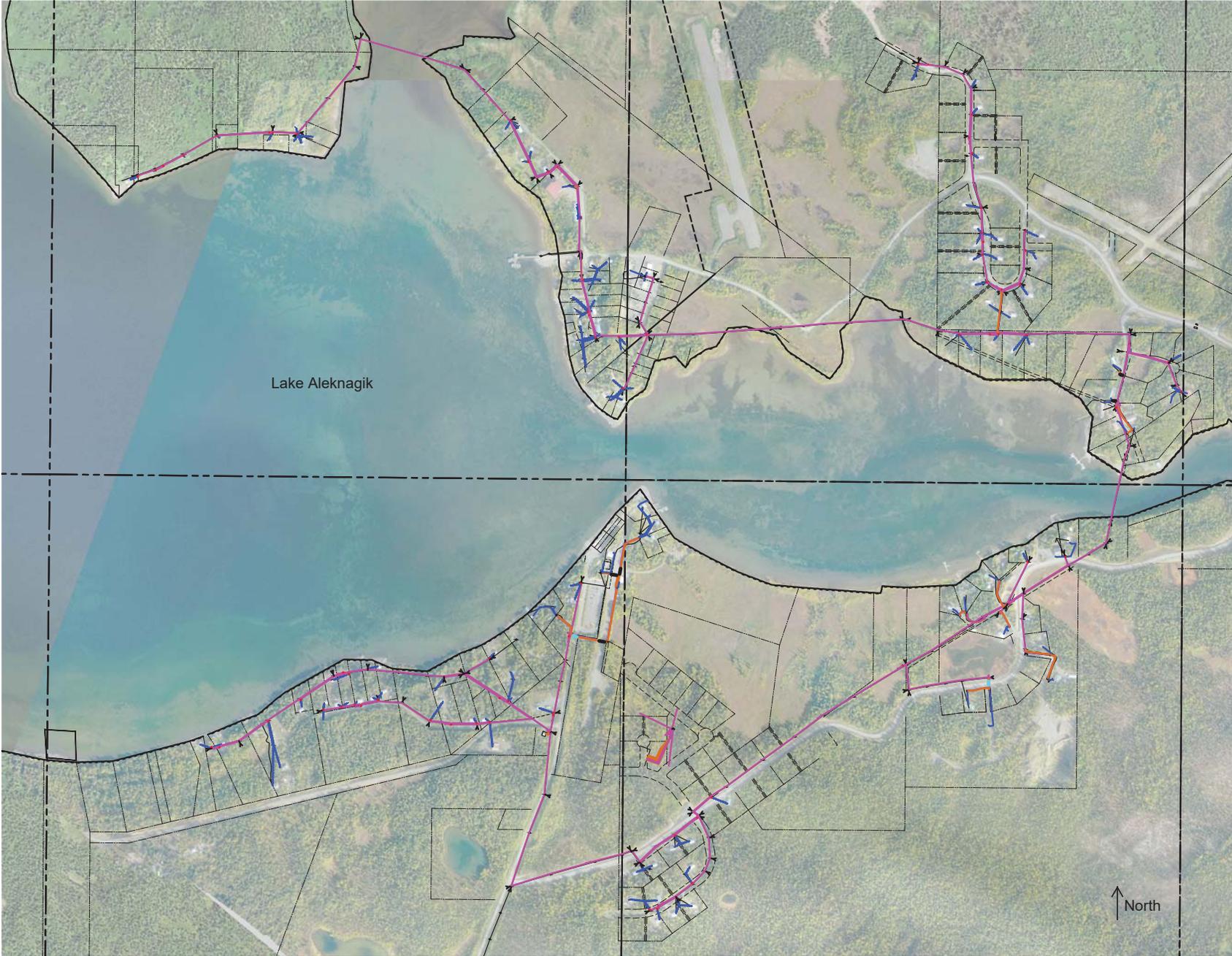
NSH-05

SHEET: 11 OF 10

NO.	REVISION DESCRIPTIONS	DATE

Aleknagik Fiber to the Home

- Legend
- Aerial Fiber
Optic Cable
 - Fiber to the
Home Connections



Aleknagik to Dillingham

Fiber optic cable

Legend

- Aleknagik to Dillingham
- Buried Fiber to the Home
- Aerial Fiber to the Home

Aleknagik

Google Earth

Image © 2023 Airbus

Image © 2023 Maxar Technologies

Image © 2023 CNES / Airbus

Dillingham

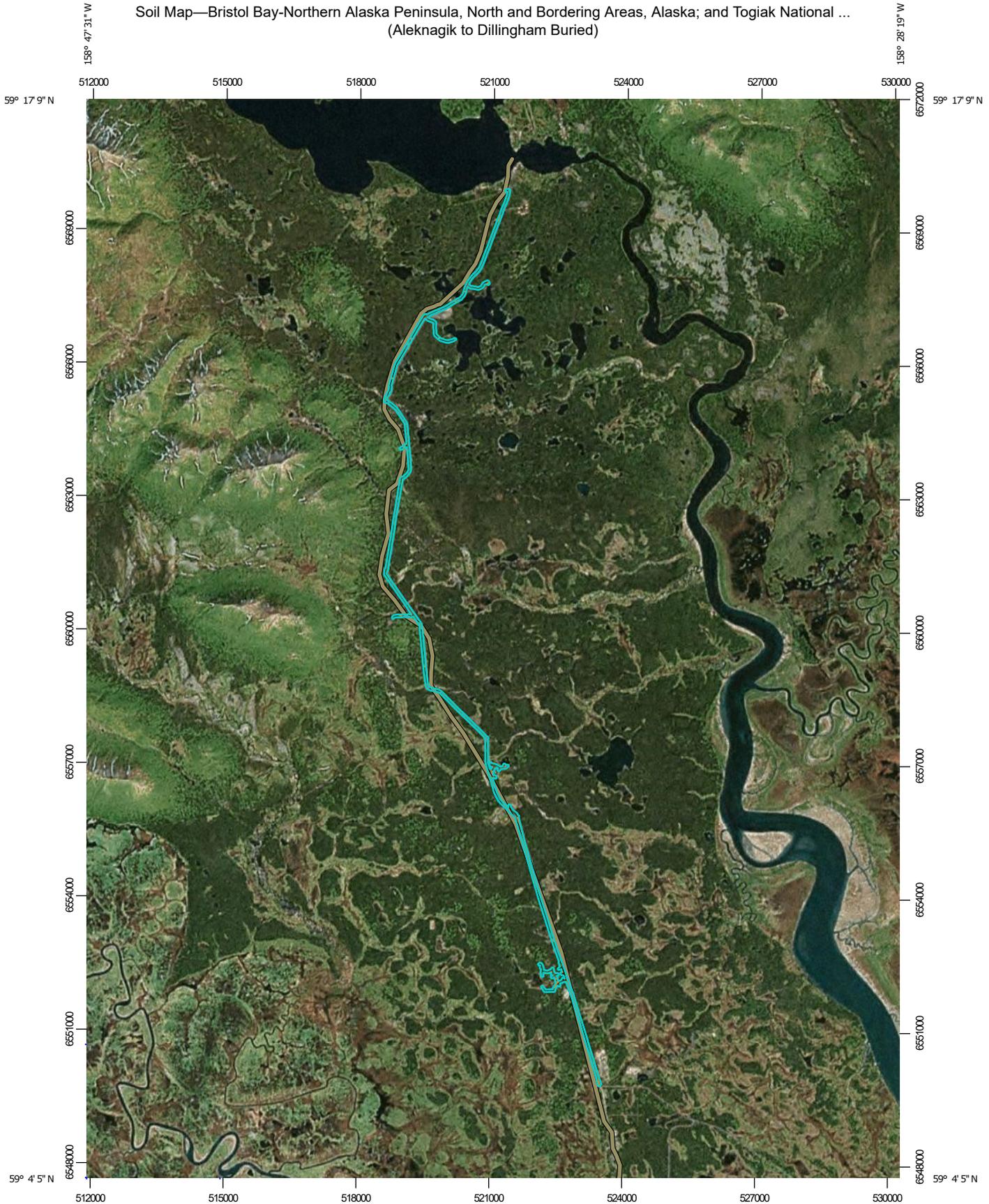
6 mi



Appendix B
Web Soil Survey Information

Soil Maps
Prime and Other Important Farmlands

Soil Map—Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska; and Togiak National ...
(Aleknagik to Dillingham Buried)



Map Scale: 1:118,000 if printed on A portrait (8.5" x 11") sheet.

0 1500 3000 6000 9000 Meters

0 5000 10000 20000 30000 Feet

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 4N WGS84



MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:63,400.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska

Survey Area Data: Version 10, Aug 30, 2022

Soil Survey Area: Togiak National Wildlife Refuge-Ahklun Mountains Area, Alaska

Survey Area Data: Version 6, Aug 30, 2022

Your area of interest (AOI) includes more than one soil survey area. These survey areas may have been mapped at different scales, with a different land use in mind, at different times, or at different levels of detail. This may result in map unit symbols, soil properties, and interpretations that do not completely agree across soil survey area boundaries.

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jan 1, 1999—Dec 31, 2003

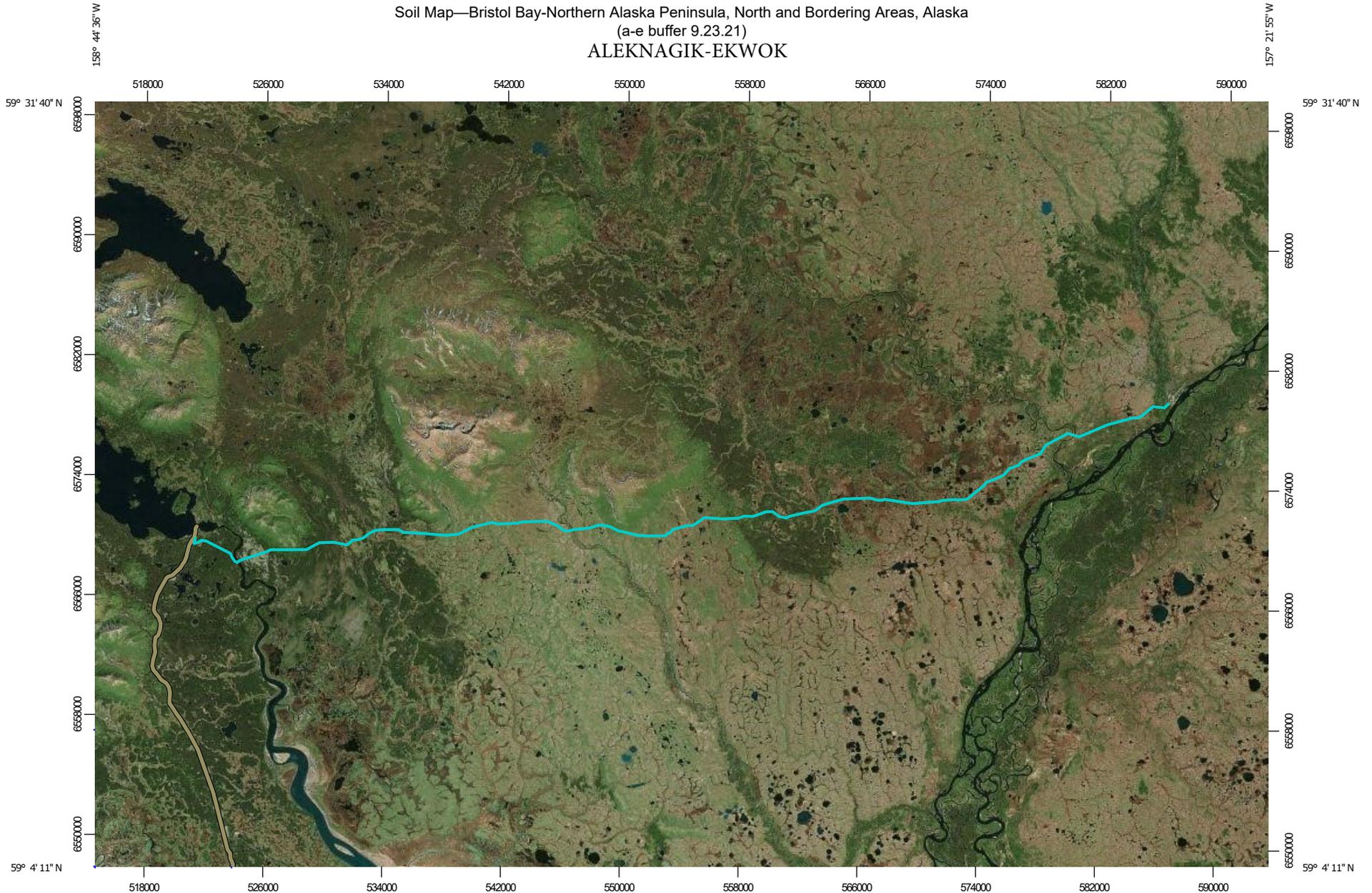
The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

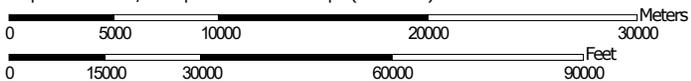
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
36GP01	Pits, gravel	0.2	0.1%
36HP01	Wearyriver peat, 0 to 3 percent slopes	1.4	0.3%
36HP05	Pellernarquq-Wearyriver complex, 0 to 3 percent slopes	1.9	0.4%
36KA11	Kanakanak highly organic silt loam, 0 to 6 percent slopes	80.6	18.6%
36SP03	Aleknagik-Terlak complex, 0 to 12 percent slopes	77.0	17.8%
36SP04	Aleknagik-Terlak-Water complex, 0 to 15 percent slopes	27.4	6.3%
3701	Okstukuk-Typic Haplocryods complex, 0 to 8 percent slopes	226.0	52.2%
4003	Tikchik-Cranberrycreek-Sharp-Stuyahok complex, 0 to 40 percent slopes	16.2	3.8%
Subtotals for Soil Survey Area		430.7	99.6%
Totals for Area of Interest		432.5	100.0%

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
3701	Okstukuk-Typic Haplocryods complex, 0 to 8 percent slopes	1.8	0.4%
Subtotals for Soil Survey Area		1.8	0.4%
Totals for Area of Interest		432.5	100.0%

Soil Map—Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska
(a-e buffer 9.23.21)
ALEKNAGIK-EKWOK



Map Scale: 1:359,000 if printed on A landscape (11" x 8.5") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 4N WGS84



ALEKNAGIK-EKWOK

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features

-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features

Water Features

 Streams and Canals

Transportation

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

Background

 Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:63,400.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska
Survey Area Data: Version 8, Jun 1, 2020

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jan 1, 1999—Dec 31, 2003

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

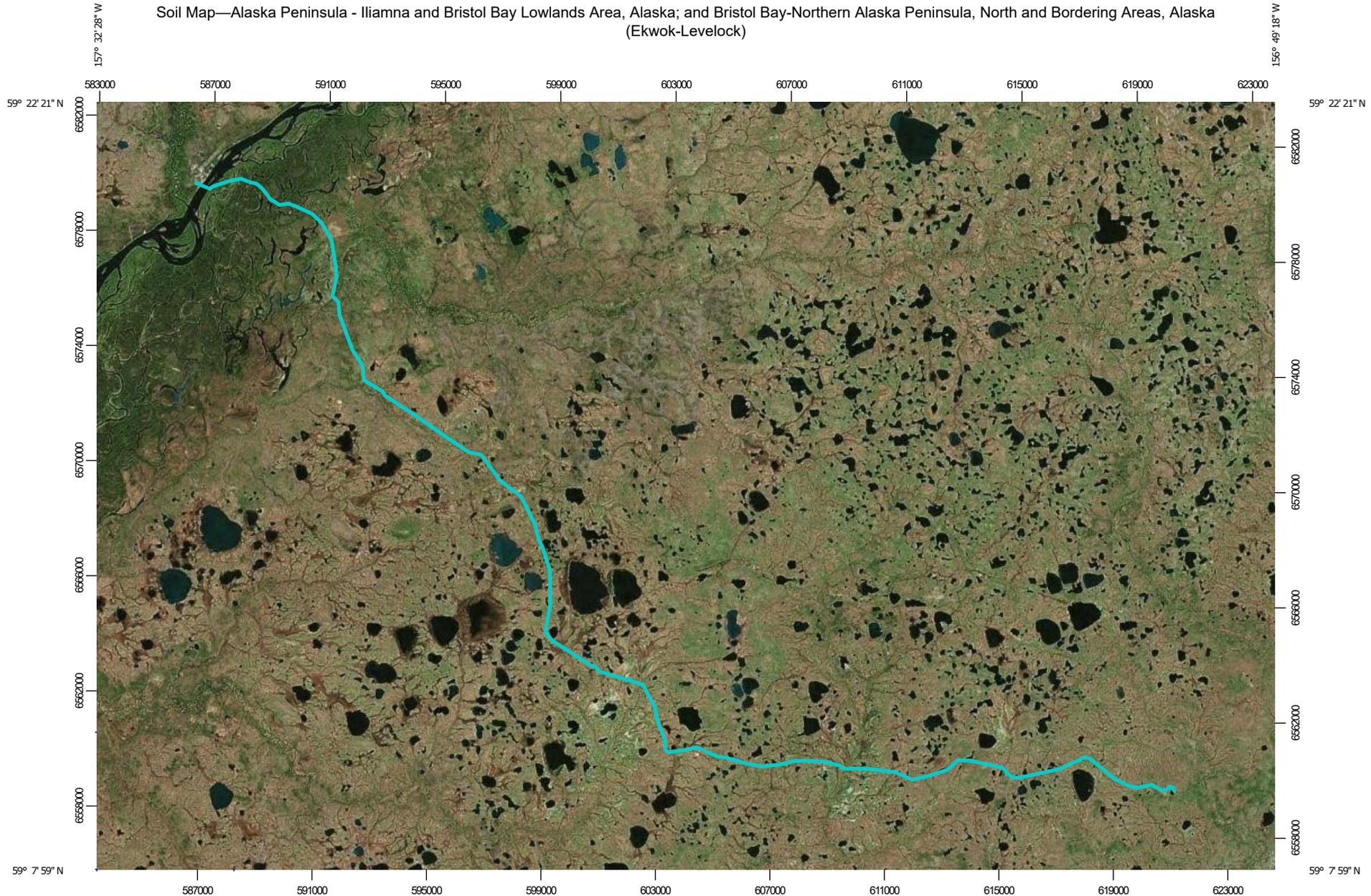
Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
36ET01	Egtuk highly organic very fine sandy loam, 1 to 5 percent slopes	0.7	0.1%
36EV01	Ekvik silt loam, 35 to 96 percent slopes	1.0	0.1%
36EW01	Ekwok highly organic silt loam, 0 to 5 percent slopes	13.3	1.2%
36HT01	Pellernarq mucky peat, 0 to 3 percent slopes	0.6	0.1%
36KM01	Kemuk mucky peat, 0 to 4 percent slopes	1.2	0.1%
36KT02	Klutuk highly organic silt loam, 0 to 5 percent slopes	8.7	0.8%
36KW01	lowithla-Kokwok complex, 0 to 5 percent slopes	14.0	1.3%
36SP03	Aleknagik-Terlak complex, 0 to 12 percent slopes	44.4	4.2%
2505	Fluvaquentic Cryaquepts, range-Fluvaquentic Cryaquepts, forest-Histic Cryaquepts complex, 0 to 5 percent slopes	14.2	1.3%
3700	Okstukuk-Mosquitopoint-Typic Haplocryods association, 0 to 8 percent slopes	102.8	9.6%
3701	Okstukuk-Typic Haplocryods complex, 0 to 8 percent slopes	284.4	26.7%
D36FPM	Boreal Flood Plains, High Energy	7.0	0.7%
D36HIC	Western Maritime Eolian Hills and Plains with Common Permafrost	36.7	3.4%
D36HIE	Western Maritime Eolian Hills and Plains, Cool	23.5	2.2%
D36HIG	Western Maritime Eolian Plains and Drainageways, Undulating	168.4	15.8%
D36PNA	Boreal and Western Maritime Plains, Dry	37.9	3.5%
D36PNG	Western Maritime Eolian Plains and Flood Plains with Common Permafrost	53.0	5.0%
D36PNH	Western Maritime Organic and Glaciated Plains	109.3	10.2%

ALEKNAGIK-EKWOK

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
D36PNI	Western Maritime Glaciated Plains, Rolling	24.9	2.3%
D36PNV	Boreal Plains, Dry and Nearly Level	64.0	6.0%
D36WTR	Open Water	0.6	0.1%
R37MTG	Ahklun Mountains-Western Maritime Low and High Elevation Mountains	56.1	5.3%
Totals for Area of Interest		1,066.8	100.0%

Soil Map—Alaska Peninsula - Iliamna and Bristol Bay Lowlands Area, Alaska; and Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska (Ekwook-Levelock)



Map Scale: 1:187,000 if printed on A landscape (11" x 8.5") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 4N WGS84

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at scales ranging from 1:24,000 to 1:63,400.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Alaska Peninsula - Iliamna and Bristol Bay Lowlands Area, Alaska

Survey Area Data: Version 2, Jun 4, 2020

Soil Survey Area: Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska

Survey Area Data: Version 8, Jun 1, 2020

Your area of interest (AOI) includes more than one soil survey area. These survey areas may have been mapped at different scales, with a different land use in mind, at different times, or at different levels of detail. This may result in map unit symbols, soil properties, and interpretations that do not completely agree across soil survey area boundaries.

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jan 1, 1999—Dec 31, 2003

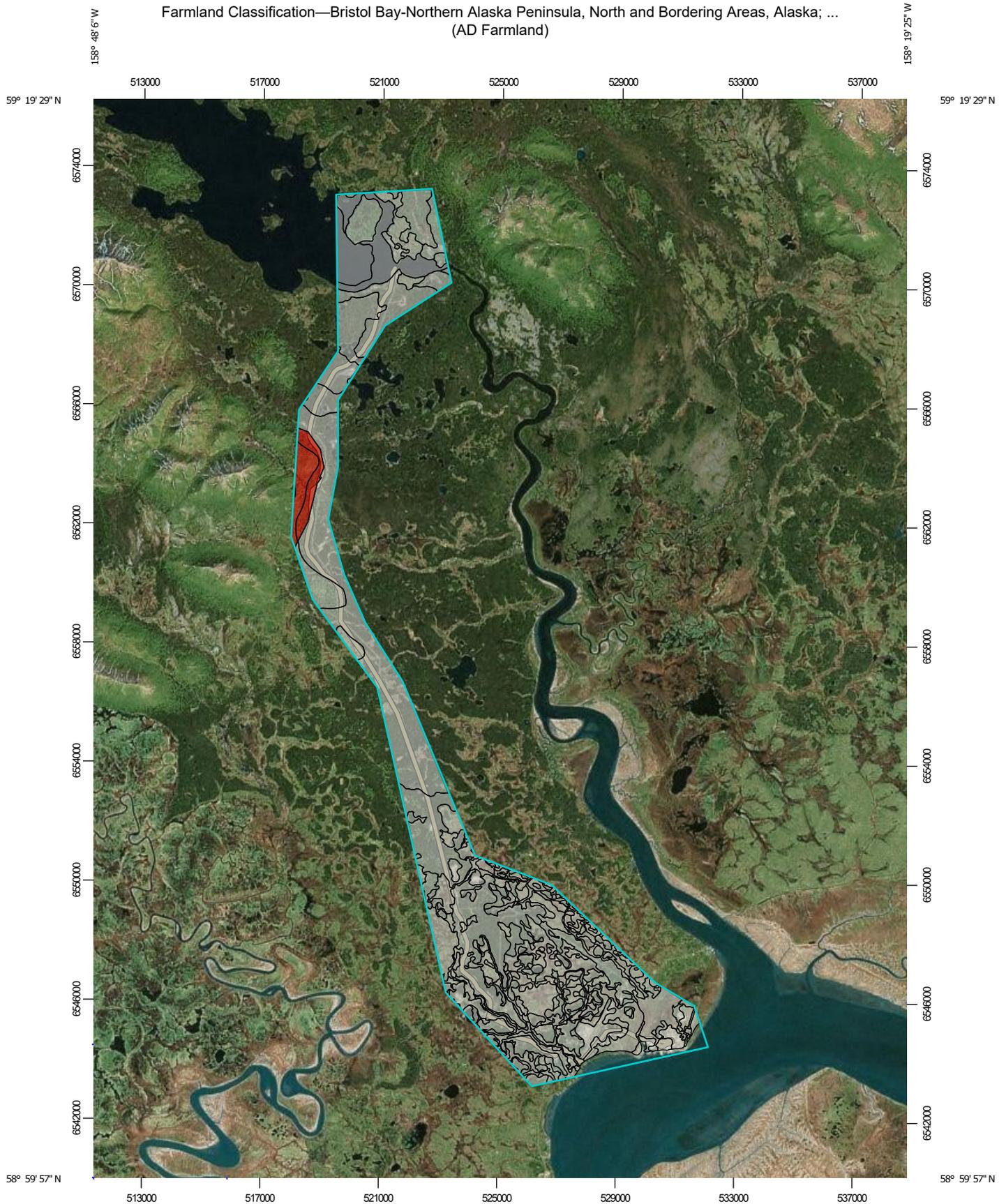
The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

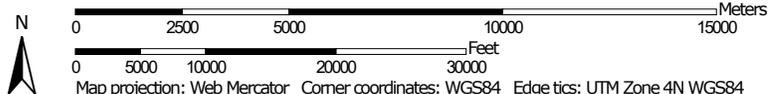
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
NOTCOM	No Digital Data Available	178.6	24.5%
Subtotals for Soil Survey Area		178.6	24.5%
Totals for Area of Interest		727.9	100.0%

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
36KW01	lowithla-Kokwok complex, 0 to 5 percent slopes	3.1	0.4%
D36FPO	Boreal Flood Plains, Open, Rarely to Occasionally Flooded	14.7	2.0%
D36FPS	Boreal Flood Plains and Terraces, Low	8.6	1.2%
D36FPT	Boreal Flood Plains and Terraces, High	31.0	4.3%
D36FPW	Boreal Flood Plains, High	5.6	0.8%
D36FPZ	Boreal Flood Plains, Mid	3.6	0.5%
D36PNA	Boreal and Western Maritime Plains, Dry	82.3	11.3%
D36PNB	Western Maritime Eolian Plains, Very Wet	299.8	41.2%
D36PNF	Boreal and Western Maritime Glaciated Plains, Dry	0.1	0.0%
D36PNS	Western Maritime Glaciated Plains and Flood Plains, Wet	50.9	7.0%
D36TER	Western Maritime Terraces, Very Wet	44.2	6.1%
D36TEW	Boreal Terraces	1.0	0.1%
D36WTR	Open Water	4.5	0.6%
Subtotals for Soil Survey Area		549.3	75.5%
Totals for Area of Interest		727.9	100.0%

Farmland Classification—Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska; ...
(AD Farmland)

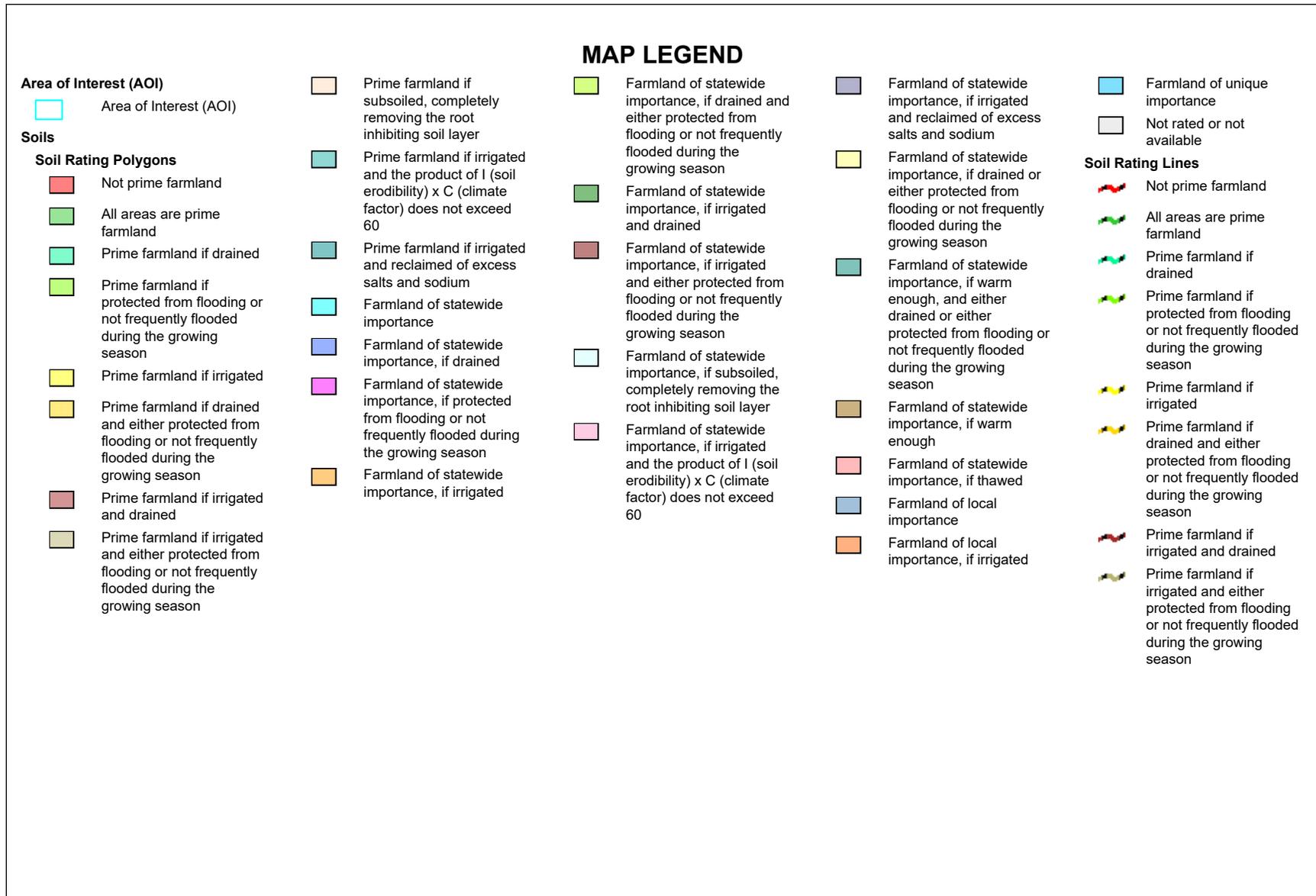


Map Scale: 1:176,000 if printed on A portrait (8.5" x 11") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 4N WGS84





Farmland Classification—Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska; Southern Wood-Tikchik Area, Alaska; Togiak National Wildlife Refuge - Southwestern Part and Bordering Area, Alaska; and Togiak National Wildlife Refuge-Ahklun Mountains Area, Alaska
(AD Farmland)

	Prime farmland if subsoiled, completely removing the root inhibiting soil layer		Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium		Farmland of unique importance		Prime farmland if subsoiled, completely removing the root inhibiting soil layer
	Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of statewide importance, if irrigated and drained		Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season		Not prime farmland		Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
	Prime farmland if irrigated and reclaimed of excess salts and sodium		Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season		Prime farmland if drained		Prime farmland if irrigated and reclaimed of excess salts and sodium
	Farmland of statewide importance		Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer		Farmland of statewide importance, if warm enough		Prime farmland if protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance
	Farmland of statewide importance, if drained		Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60		Farmland of statewide importance, if thawed		Prime farmland if irrigated		Farmland of statewide importance, if drained
	Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season				Farmland of local importance		Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season		Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season
	Farmland of statewide importance, if irrigated				Farmland of local importance, if irrigated		Prime farmland if irrigated and drained		Farmland of statewide importance, if irrigated
							Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season		

Farmland Classification—Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska; Southern Wood-Tikchik Area, Alaska; Togiak National Wildlife Refuge - Southwestern Part and Bordering Area, Alaska; and Togiak National Wildlife Refuge-Ahklun Mountains Area, Alaska
(AD Farmland)

 Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season	 Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium	 Farmland of unique importance  Not rated or not available	<p>The soil surveys that comprise your AOI were mapped at scales ranging from 1:24,000 to 1:63,400.</p>
 Farmland of statewide importance, if irrigated and drained	 Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season	<p>Water Features</p>  Streams and Canals	<p>Please rely on the bar scale on each map sheet for map measurements.</p>
 Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season	 Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season	<p>Transportation</p>  Rails	<p>Source of Map: Natural Resources Conservation Service Web Soil Survey URL: Coordinate System: Web Mercator (EPSG:3857)</p>
 Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer	 Farmland of statewide importance, if warm enough	 Interstate Highways	<p>Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.</p>
 Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60	 Farmland of statewide importance, if thawed	 US Routes	<p>This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.</p>
	 Farmland of local importance	 Major Roads	<p>Soil Survey Area: Bristol Bay-Northern Alaska Peninsula, North and Bordering Areas, Alaska Survey Area Data: Version 10, Aug 30, 2022</p>
	 Farmland of local importance, if irrigated	 Local Roads	<p>Soil Survey Area: Southern Wood-Tikchik Area, Alaska Survey Area Data: Version 5, Mar 1, 2023</p>
		<p>Background</p>  Aerial Photography	<p>Soil Survey Area: Togiak National Wildlife Refuge - Southwestern Part and Bordering Area, Alaska Survey Area Data: Version 4, Aug 30, 2022</p>
			<p>Soil Survey Area: Togiak National Wildlife Refuge-Ahklun Mountains Area, Alaska Survey Area Data: Version 6, Aug 30, 2022</p>
			<p>Your area of interest (AOI) includes more than one soil survey area. These survey areas may have been mapped at different scales, with a different land use in mind, at different times, or at different levels of detail. This may result in map unit symbols, soil properties, and interpretations that do not completely agree across soil survey area boundaries.</p>
			<p>Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.</p>
			<p>Date(s) aerial images were photographed: Jan 1, 1999—Dec 31, 2003</p>
			<p>The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.</p>

Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
36DM01	Mosquitopoint-Damcreek complex, 0 to 14 percent slopes		339.4	1.7%
36DU01	Duney highly organic silt loam, 1 to 7 percent slopes		8.0	0.0%
36DU04	Urban land-Duney complex, 0 to 12 percent slopes		89.0	0.4%
36FD01	Flounder highly organic silt loam, 40 to 70 percent slopes		20.2	0.1%
36GP01	Pits, gravel		70.4	0.3%
36HP01	Wearyriver peat, 0 to 3 percent slopes		1,144.3	5.7%
36HP02	Pellernarquq-Wearyriver-Nushagak complex, 2 to 6 percent slopes		88.7	0.4%
36HP05	Pellernarquq-Wearyriver complex, 0 to 3 percent slopes		963.5	4.8%
36HT01	Pellernarquq mucky peat, 0 to 3 percent slopes		1,383.2	6.8%
36KA10	Muklung-Kanakanak complex, 0 to 11 percent slopes		301.0	1.5%
36KA11	Kanakanak highly organic silt loam, 0 to 6 percent slopes		3,292.9	16.3%
36KA12	Kanakanak highly organic silt loam, 2 to 25 percent slopes		1,388.6	6.9%
36NU05	Nushagak-Kanakanak complex, 0 to 6 percent slopes		119.8	0.6%
36NU11	Nushagak mucky peat, 0 to 3 percent slopes		502.3	2.5%
36NU12	Nushagak mucky peat, 3 to 11 percent slopes		481.4	2.4%
36SH01	Sheepisland peat, 0 to 3 percent slopes		34.0	0.2%
36SP01	Aleknagik highly organic silt loam, 1 to 3 percent slopes		80.2	0.4%

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
36SP02	Aleknagik-Damcreek complex, 4 to 25 percent slopes		507.5	2.5%
36SP03	Aleknagik-Terlak complex, 0 to 12 percent slopes		1,707.4	8.4%
36SP04	Aleknagik-Terlak-Water complex, 0 to 15 percent slopes		860.4	4.3%
36SR01	Snakeriver-Wearyriver complex, 0 to 3 percent slopes		339.5	1.7%
36UB01	Urban land-Duney complex, 0 to 7 percent slopes		180.7	0.9%
36WA01	Water		880.0	4.3%
3700	Okstukuk-Mosquitopoint-Typic Haplocryods association, 0 to 8 percent slopes		101.0	0.5%
3701	Okstukuk-Typic Haplocryods complex, 0 to 8 percent slopes		3,141.9	15.5%
4003	Tikchik-Cranberrycreek-Sharp-Stuyahok complex, 0 to 40 percent slopes		333.6	1.6%
Subtotals for Soil Survey Area			18,358.7	90.7%
Totals for Area of Interest			20,242.2	100.0%

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
W	Water		462.4	2.3%
Subtotals for Soil Survey Area			462.4	2.3%
Totals for Area of Interest			20,242.2	100.0%

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
NOTCOM	No Digital Data Available		344.6	1.7%
Subtotals for Soil Survey Area			344.6	1.7%
Totals for Area of Interest			20,242.2	100.0%

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
3701	Okstukuk-Typic Haplocryods complex, 0 to 8 percent slopes	Not prime farmland	286.1	1.4%

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
4003	Tikchik-Cranberrycreek-Sharp-Stuyahok complex, 0 to 40 percent slopes	Not prime farmland	321.3	1.6%
5004	Klak-Mitlak-Twinhills association, 5 to 65 percent slopes	Not prime farmland	4.5	0.0%
Subtotals for Soil Survey Area			611.9	3.0%
Totals for Area of Interest			20,242.2	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower

Appendix C
Water Resource Information

Anadromous Waters
ADF&G Fish Habitat Permit
Drinking Water Protection Areas
Flood Insurance Rate Maps

Anadromous Waters

Anadromous waters crossed by the Proposed Action in Yellow



Google Earth

Image © 2023 TerraMetrics
Image Landsat / Copernicus

10 mi



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Fish and
Game**

HABITAT SECTION
Southcentral Regional Office

333 Raspberry Road
Anchorage, Alaska
Main: 907.267.2342
Fax: 907.267.2499

FISH HABITAT PERMIT FH23-II-0095

ISSUED: August 25, 2023

EXPIRES: April 15, 2024

Nushagak Electric & Telephone Cooperative, Inc.
Attn: Will Chaney
PO Box 350
557 Kenny Wren Rd
Dillingham, AK 99576

RE: Fiber Optic Cable Installation
Lower Klutuk Creek (Water Body No. 325-30-10100-2112)
Section 5&6, T 10 S, R 48 W, SM
Location: 59.339382 N, 157.416594 W

Kokwok River (Water Body No. 325-30-10100-2129)
Section 7, T 10 S, R 49 W, SM
Location: 59.328942 N, 157.594671 W

Koklong Creek (Water Body No. 325-30-10100-2121)
Section 20, T 10 S, R 49 W, SM
Location: 59.288730 N, 157.751441 W
Section 29, T 10 S, R 51 W, SM
Location: 59.282879 N, 157.899998 W

Iowithla River (Water Body No. 325-30-10100-2101)
Section 34, T 10 S, R 53 W, SM
Location: 59.271825 N, 158.181208 W

Muklung River (Water Body No. 325-30-10100-2031-3028)
Section 32, T 10 S, R 54 W, SM
Location: 59.271589 N, 158.411712 W

Unnamed Tributary to Arcana Creek (Water Body No. 325-30-10100-2031-3054-4010)
Section 36, T 10 S, R 55 W, SM
Location: 59.264007 N, 158.477651 W

Arcana Creek (Water Body No. 325-30-10100-2031-3054)
Section 35, T 10 S, R 55 W, SM
Location: 59.260574 N, 158.492597 W

Dear Will Chaney:

Pursuant to the Anadromous Fish Act at AS 16.05.871 (b), the Alaska Department of Fish and Game (ADF&G) Habitat Section has reviewed your proposal to install fiber optic cable between Levelock, Ekwok, and Aleknagik.

Project Description

You propose to install fiber optic cable for high-speed internet between the communities of Levelock, Ekwok, and Aleknagik as part of the Middle Mile Project (see Location Map). Installation methods will primarily be direct burial using a tracked Ditch Witch cable plow or similar; supported by a D4 tracked bulldozer, a small tracked excavator, and a tracked hydro axe. With the exception of the tracked excavator, all equipment will cross each water body once.

The cable will be installed at a depth of 18-24 inches along a 14-foot wide corridor cleared of vegetation. The trench will be 6 inches wide and buried soon after installation. Work will begin in Levelock and proceed to Aleknagik crossing the above reference streams under frozen conditions. If the combined depth of water and ice at a crossing site is less than 7 feet, then the cable will be trenched into the substrate. If the depth is greater than 7 feet, a heavier duty submarine cable will be slack laid on the surface of the river bottom and held in place by 24-inch plate anchors and rods on both sides. The riverbank slope will be cut back from the water surface and a trench will be excavated about 50 feet back from the top of the bank. The excavator may cross up to three times to restore the streambanks to pre-project contours.

Cable crossings of Klutuk Creek, the Nushagak River, and the Wood River will be directionally drilled staying a minimum of 10-feet below the thalweg, 30-feet back from the streambank, and is not expected to impact areas below ordinary high water line (OHW) (see Drainage Cross Section).

If ice thickness is insufficient to support heavy equipment, an ice bridge will be constructed by withdrawing water and flooding the crossing. For ice bridge construction, a pump with a 4-inch intake will be fitted with a properly sized fish screen and withdraw up to 10,000 gallons daily at a rate of 800 gallons per minute or less.

Anadromous Fish Act

These water bodies have been specified as being important for the spawning, rearing, or migration of anadromous fishes pursuant to AS 16.05.871(a). The water bodies provide habitat for chum, coho, Chinook, pink, and sockeye salmon, and Arctic char, rainbow smelt, and whitefish.

In accordance with AS 16.05.871(d), your project is approved subject to the project description, the following stipulations, and the permit terms.

1. Disturbed shoreline and streambank areas attributable to this project shall be stabilized to prevent erosion and sedimentation.
2. Equipment shall not be fueled or serviced, and fuel shall not be stored below ordinary high water line of the waterbodies referenced above. Vehicles leaking fuel, hydraulic fluids or other pollutants shall not be operated below the OHW of the water bodies referenced above.
3. Winter crossings shall only be completed if ice thickness is sufficient to support the equipment. Open water crossings with equipment and vehicles are not authorized by this permit.
4. If ice bridges are required, to avoid entrainment, impingement, or injury to fish, a properly sized and screened structure must surround the water intake. The screen mesh shall not exceed 1/8 inches (3.175 mm) and the water velocity at the screen surface shall not exceed 0.5 feet per second.
5. Photographs and measurements of the properly sized fish screen structure shall be submitted to the ADF&G Habitat Section by email (dfg.hab.infoanc@alaska.gov) prior to withdrawing water.
6. Constructed ice and snow bridges shall be breached or fractured prior to spring breakup so that their breakup rate approximates that of a normal occurrence. Breaching and fracturing shall be done in such a manner that vegetated areas and the streambed are not disturbed.

Permit Terms

This letter constitutes a permit issued under the authority of AS 16.05.871 and must be retained on site during project activities. Please be advised that this determination applies only to activities regulated by the Habitat Section; other agencies also may have jurisdiction under their respective authorities. This determination does not relieve you of your responsibility to secure other permits; state, federal, or local. You are still required to comply with all other applicable laws.

You are responsible for the actions of contractors, agents, or other persons who perform work to accomplish the approved project. For any activity that significantly deviates from the approved plan, you shall notify the Habitat Section and obtain written approval in the form of a permit amendment before beginning the activity. Any action that increases the project's overall scope or that negates, alters, or minimizes the intent or effectiveness of any provision contained in this permit will be deemed a significant deviation from the approved plan. The final determination as to the significance of any deviation and the need for a permit amendment is the responsibility of the Habitat Section. Therefore, we recommend you consult the Habitat Section immediately before considering any deviation from the approved plan.

You shall give an authorized representative of the state free and unobstructed access to the permit site, at safe and reasonable times, for the purpose of inspecting or monitoring compliance with any provision of this permit. You shall furnish whatever assistance and information the authorized representative reasonably requires for monitoring and inspection purposes.

In addition to the penalties provided by law, this permit may be terminated or revoked for failure to comply with its provisions or failure to comply with applicable statutes and regulations. You shall mitigate any adverse effect upon fish or wildlife, their habitats, or any restriction or interference with public use that the commissioner determines was a direct result of your failure to comply with this permit or any applicable law.

You shall indemnify, save harmless, and defend the department, its agents, and its employees from any and all claims, actions, or liabilities for injuries or damages sustained by any person or property arising directly or indirectly from permitted activities or your performance under this permit. However, this provision has no effect if, and only if, the sole proximate cause of the injury is the department's negligence.

You may appeal this permit decision relating to AS 16.05.871 in accordance with the provisions of AS 44.62.330-630.

Please direct questions about this permit to Habitat Biologist Andrew Kastning at 907-267-2813 or andrew.kastning@alaska.gov.

Sincerely,
Doug Vincent-Lang
Commissioner



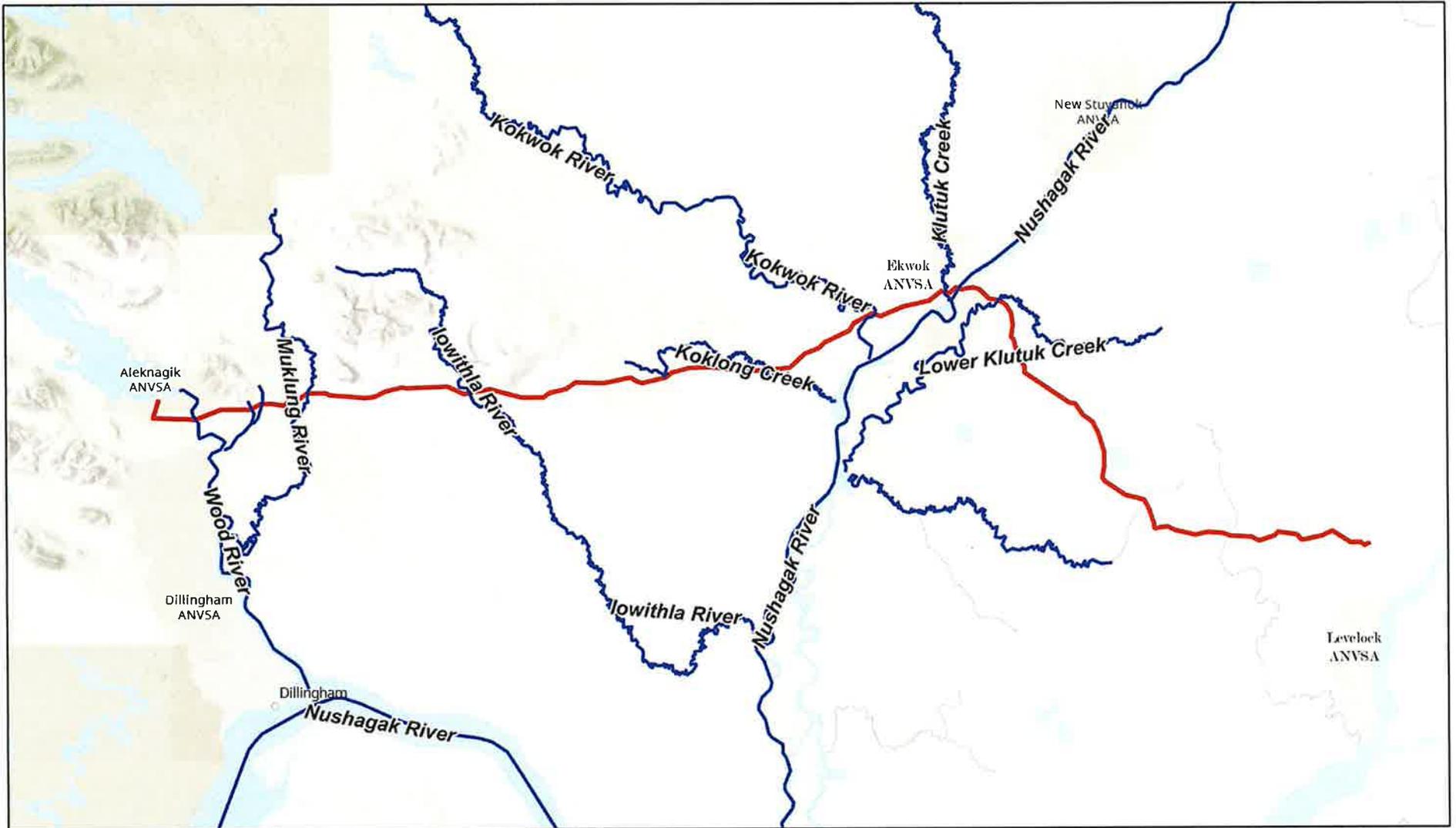
By Ron Benkert
Southcentral Regional Supervisor

Enclosures: Location Map

Email cc:

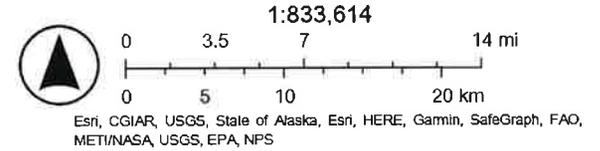
A. Ott, ADF&G-HAB
L. Borden, ADF&G-SF
T. Sands, ADF&G-CF
C. Larson, ADNR DMLW
A. Eskelin, ADNR WTSP
ADNR - TWUA
J. Rypkema, ADEC
USACE, Regulatory
DPS/AWT, Dillingham

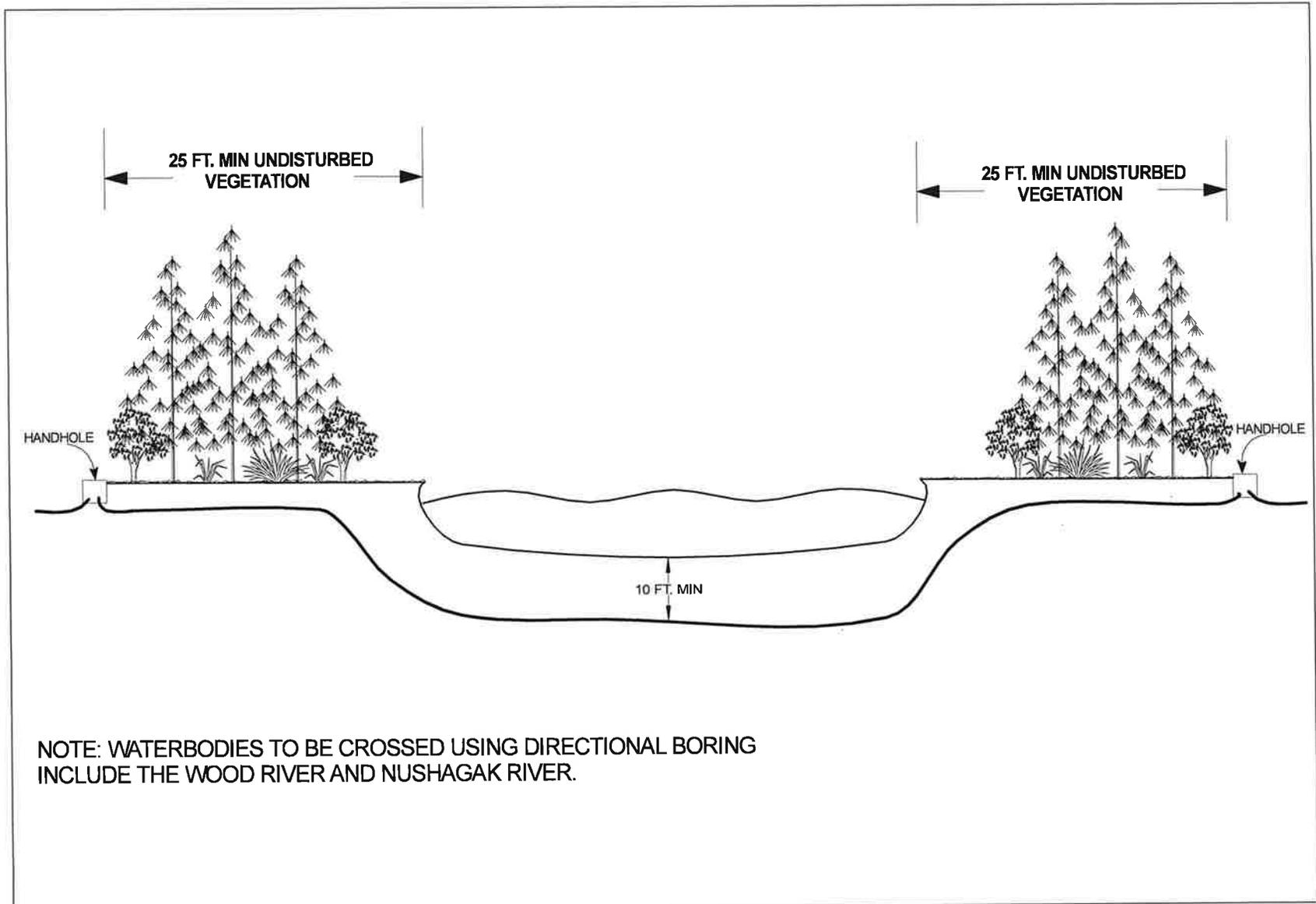
Levelock to Aleknagik Fiber Optic Cable Route



8/15/2023

-  AWC stream
-  Levelock - Ekwok FOC route
-  Ekwok - Aleknagik FOC route
-  World Hillshade

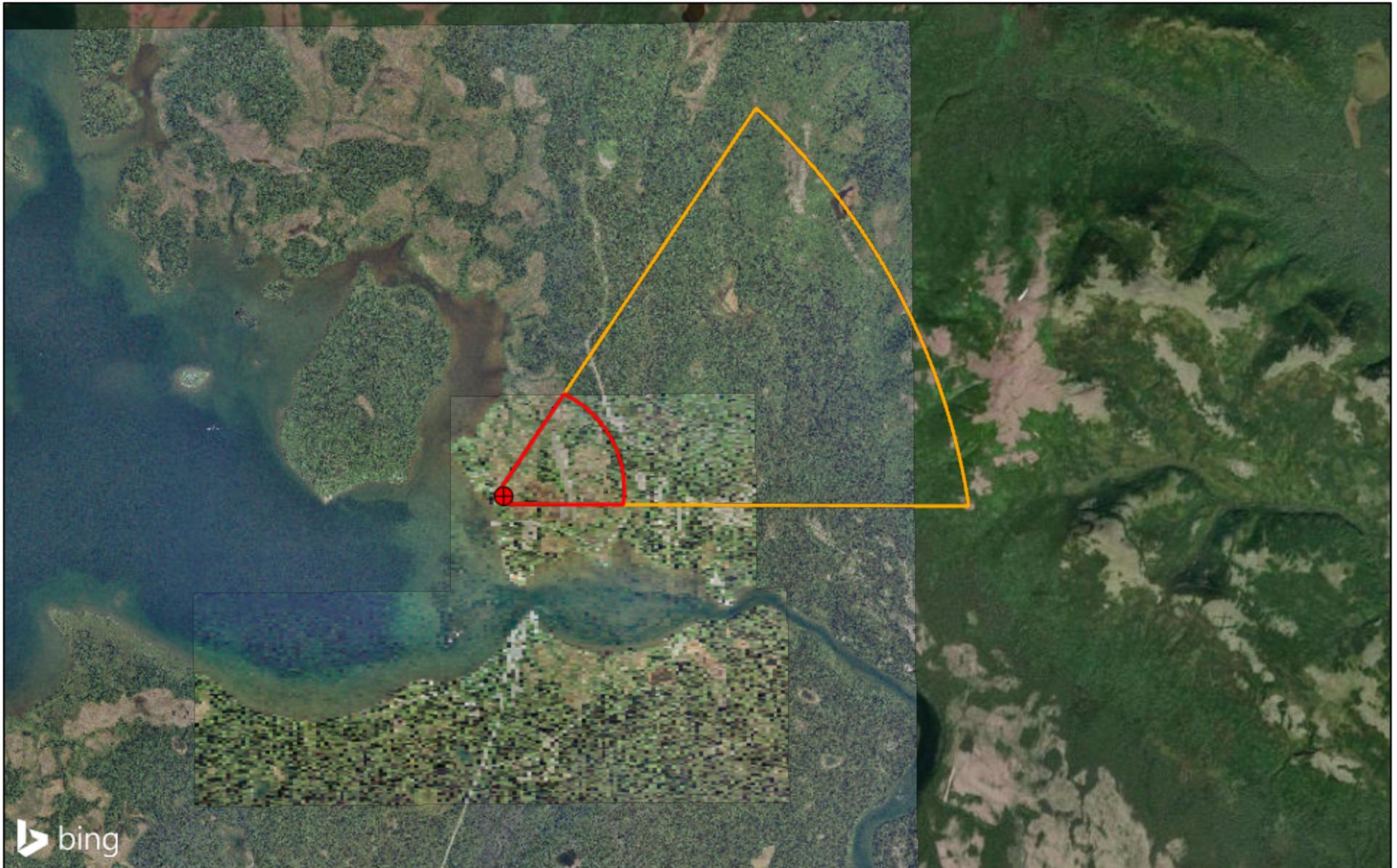




NOTE: WATERBODIES TO BE CROSSED USING DIRECTIONAL BORING
INCLUDE THE WOOD RIVER AND NUSHAGAK RIVER.

<p>3 - TIER ALASKA 326 DRIVEWAY STREET FAIRBANKS, ALASKA 99701</p>	<p>TEMPTEL</p>	<p>RIVER BORE CROSS SECTION</p>	
<p>PROJECT NO: 1639-19</p>	<p>FILE: PROJECTS/1639/19/JDR/NEW FOLDER/BORING.SKF</p>	<p>DATE: 5/10/2023</p>	<p>SCALE: NOT TO SCALE</p>

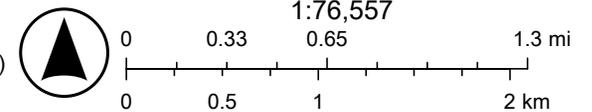
Aleknagik Alaska DEC Drinking Water Protection Areas



6/29/2023

Alaska DEC Public Water System Sources

-  Non-Transient Non-Community Water System (NTNC)
-  Zone A (GW-Several Months Time of Travel or SW 1000 ft buffer)
-  Zone B (GW-2 Yr Time of Travel or SW-1 mile buffer)



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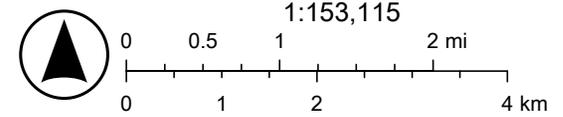
Dillingham Alaska DEC Drinking Water Protection Areas



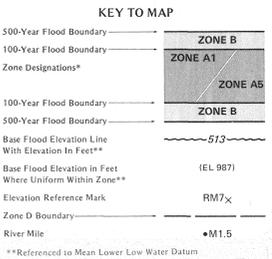
6/29/2023

Alaska DEC Public Water System Sources

-  Community Water System (C)
-  Non-Transient Non-Community Water System (NTNC)
-  Non-Community Water System (NC)
-  Zone A (GW-Several Months Time of Travel or SW 1000 ft buffer)
-  Zone B (GW-2 Yr Time of Travel or SW-1 mile buffer)



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***EXPLANATION OF ZONE DESIGNATIONS**

ZONE	EXPLANATION
A	Areas of 100-year flood; base flood elevations and flood hazard factors not determined.
A0	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depths of inundation are shown, but no flood hazard factors are determined.
AH	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; base flood elevations are shown, but no flood hazard factors are determined.
A1-A30	Areas of 100-year flood; base flood elevations and flood hazard factors determined.
A99	Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined.
B	Areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than one (1) foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood. (Medium shading)
C	Areas of minimal flooding. (No shading)
D	Areas of undetermined, but possible, flood hazards.
V	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined.
V1-V30	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined.

NOTES TO USER

Certain areas not in the special flood hazard areas (zones A and V) may be protected by flood control structures.

This map is for flood insurance purposes only; it does not necessarily show all areas subject to flooding in the community or all planimetric features outside special flood hazard areas.

For adjoining map panels, see separately printed Index To Map Panels.

INITIAL IDENTIFICATION:
MAY 31, 1974

FLOOD HAZARD BOUNDARY MAP REVISIONS:
DECEMBER 12, 1975

FLOOD INSURANCE RATE MAP EFFECTIVE:
SEPTEMBER 30, 1982

FLOOD INSURANCE RATE MAP REVISIONS:

Refer to the FLOOD INSURANCE RATE MAP EFFECTIVE date shown on this map to determine when actuarial rates apply to structures in the zones where elevations or depths have been established.

To determine if flood insurance is available in this community, contact your insurance agent, or call the National Flood Insurance Program, at (800) 638-6626.



ELEVATION REFERENCE MARKS

REFERENCE MARK	ELEVATION (FT. MLLW)	DESCRIPTION OF LOCATION
RM1	39.5	A standard U.S. Army Corps of Engineers bench mark cap set in the side of the concrete foundation of the National Bank of Alaska, 2 feet east of the southeast corner and 2 feet above the ground on south side of building, 40 feet northeast of centerline of Main Street, U.S. Survey No. 2874, 3-inch galvanized pipe set loosely in ground, center mark factory forged "G". Located 65 feet south of the centerline of Dillingham-Alaknagik Road. Established by U.S. Bureau of Land Management.
RM2	31.7	U.S. Army Corps of Engineers survey cap set in the west side of the concrete foundation of the State-owned home of the Alaska Highway Department Maintenance Foreman. Cap is 2 feet south of the northwest corner of the home and 1.5 feet above ground.
RM3	48.7	3-inch galvanized pipe set in concrete surrounded by fence, center mark factory forged "G". U.S. Survey No. 2874. Located approximately 400 feet south of the centerline of Dillingham-Alaknagik Road. Established by U.S. Bureau of Land Management.
RM4	29.0	

NUSHAGAK RIVER

NATIONAL FLOOD INSURANCE PROGRAM

FIRM
FLOOD INSURANCE RATE MAP

CITY OF
DILLINGHAM, ALASKA
BRISTOL BAY DIVISION

PANEL 17 OF 20
(SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER
020041 0017 B

EFFECTIVE DATE:
SEPTEMBER 30, 1982

Federal Emergency Management Agency

JOINS PANEL 0016

JOINS PANEL 0019

Appendix D
Biological Resources

USFWS Information Planning and Consultation (IPaC)
Bald Eagle Nest Maps



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Anchorage Fish & Wildlife Field Office
4700 Blm Road
Anchorage, AK 99507
Phone: (907) 271-2888 Fax: (907) 271-2786

In Reply Refer To:
Project Code: 2023-0131919
Project Name: Levelock

September 22, 2023

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

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and some candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Please note that candidate species are not included on this list. We encourage you to visit the following website to learn more about candidate species in your area: <https://www.fws.gov/library/collections/candidate-conservation>

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

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

A Biological Assessment is required for construction projects (or other undertakings having

similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

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

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

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

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

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

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle

Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (<https://www.fws.gov/program/eagle-management/working-around-eagles>). Additionally, wind energy projects should follow the wind energy guidelines (<https://www.fws.gov/node/266177>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:

<https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>
<http://www.towerkill.com>

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

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds

OFFICIAL SPECIES LIST

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

This species list is provided by:

Anchorage Fish & Wildlife Field Office
4700 Blm Road
Anchorage, AK 99507
(907) 271-2888

PROJECT SUMMARY

Project Code: 2023-0131919

Project Name: Levelock

Project Type: Distribution Line - New Construction - Below Ground

Project Description: FOC Installation

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@59.132238650000005,-156.85629678045976,14z>



Counties: Lake and Peninsula County, Alaska

ENDANGERED SPECIES ACT SPECIES

There is a total of 0 threatened, endangered, or candidate species on this species list.

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

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

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

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

CRITICAL HABITATS

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

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

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

Please refer to [Alaskas Bird Nesting Season](#) for recommendations to minimize impacts to migratory birds, including eagles.

1. The [Bald and Golden Eagle Protection Act](#) of 1940.
2. The [Migratory Birds Treaty Act](#) of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are bald and/or golden eagles in your project area.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Feb 1 to Sep 30

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read the supplemental information and specifically the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

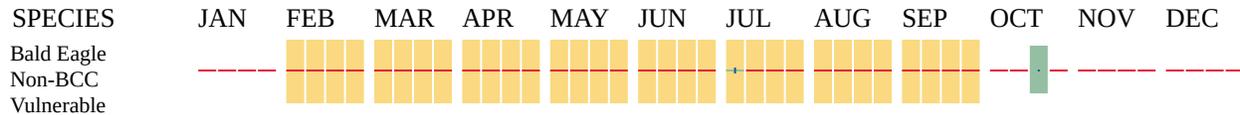
Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort — no data



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

There are migratory birds in your project area. Please refer to [Alaska's Bird Nesting Season](#) for recommendations to minimize impacts to migratory birds, including eagles.

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Feb 1 to Sep 30

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read the supplemental information and specifically the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

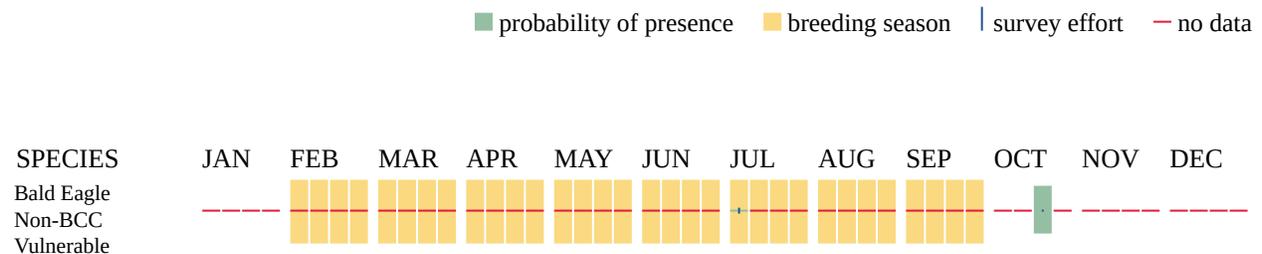
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
 - Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
 - Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
 - Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>
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IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Jessica Knowles
Address: 326 Driveway Street
City: Fairbanks
State: AK
Zip: 99701
Email: jknowles@tpeci.com
Phone: 9074557225

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Anchorage Fish & Wildlife Field Office
4700 Blm Road
Anchorage, AK 99507
Phone: (907) 271-2888 Fax: (907) 271-2786

In Reply Refer To:
Project Code: 2022-0055619
Project Name: Ekwok to Levelock Fiber Optic Cable

July 01, 2023

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

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and some candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Please note that candidate species are not included on this list. We encourage you to visit the following website to learn more about candidate species in your area:

http://www.fws.gov/alaska/fisheries/fieldoffice/anchorage/endangered/candidate_conservation.htm

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

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

threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

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

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

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

<https://www.fws.gov/birds/policies-and-regulations.php>

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

<https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>

In addition to MBTA and BGEPA, Executive Order 13186: Responsibilities of Federal Agencies to Protect Migratory Birds, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both

migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>

<http://www.towerkill.com>

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>

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

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
-

OFFICIAL SPECIES LIST

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

This species list is provided by:

Anchorage Fish & Wildlife Field Office

4700 Blm Road

Anchorage, AK 99507

(907) 271-2888

PROJECT SUMMARY

Project Code: 2022-0055619

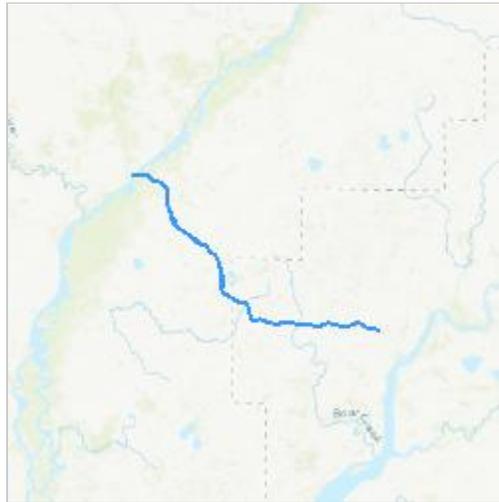
Project Name: Ekwok to Levelock Fiber Optic Cable

Project Type: Distribution Line - New Construction - Below Ground

Project Description: FOC installation

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@59.25302885,-157.29091113908697,14z>



Counties: Dillingham and Lake and Peninsula counties, Alaska

ENDANGERED SPECIES ACT SPECIES

There is a total of 0 threatened, endangered, or candidate species on this species list.

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

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

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

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

CRITICAL HABITATS

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

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

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

There are migratory birds in your project area. Please refer to [Alaska's Bird Nesting Season](#) for recommendations to minimize impacts to migratory birds, including eagles.

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\)](#) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Feb 1 to Sep 30

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the

FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

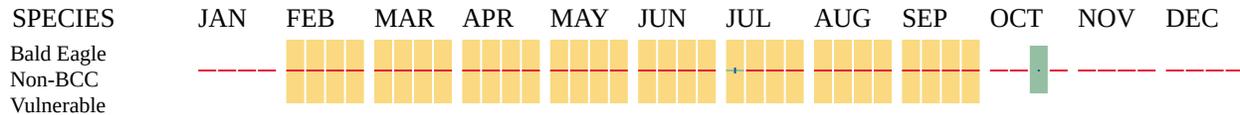
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

IPAC USER CONTACT INFORMATION

Agency: Travis/Peterson Environmental Consulting

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City: Fairbanks

State: AK

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LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Anchorage Fish & Wildlife Field Office
4700 Blm Road
Anchorage, AK 99507
Phone: (907) 271-2888 Fax: (907) 271-2786

In Reply Refer To:
Project Code: 2022-0055618
Project Name: Aleknagik to Levelock FOC

July 01, 2023

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

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and some candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Please note that candidate species are not included on this list. We encourage you to visit the following website to learn more about candidate species in your area:

http://www.fws.gov/alaska/fisheries/fieldoffice/anchorage/endangered/candidate_conservation.htm

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

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

threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

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

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

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

<https://www.fws.gov/birds/policies-and-regulations.php>

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

<https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>

In addition to MBTA and BGEPA, Executive Order 13186: Responsibilities of Federal Agencies to Protect Migratory Birds, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both

migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>

<http://www.towerkill.com>

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>

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

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
-

OFFICIAL SPECIES LIST

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

This species list is provided by:

Anchorage Fish & Wildlife Field Office

4700 Blm Road

Anchorage, AK 99507

(907) 271-2888

PROJECT SUMMARY

Project Code: 2022-0055618
Project Name: Aleknagik to Levelock FOC
Project Type: Distribution Line - New Construction - Below Ground
Project Description: FOC Installation
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@59.2996855,-157.6960398904849,14z>



Counties: Dillingham County, Alaska

ENDANGERED SPECIES ACT SPECIES

There is a total of 0 threatened, endangered, or candidate species on this species list.

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

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

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

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

CRITICAL HABITATS

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

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

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

IPAC USER CONTACT INFORMATION

Agency: Travis/Peterson Environmental Consulting

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Address: 326 Driveway Street

City: Fairbanks

State: AK

Zip: 99701

Email: jknowles@tpeci.com

Phone: 9074557225

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Anchorage Fish & Wildlife Field Office
4700 Blm Road
Anchorage, AK 99507
Phone: (907) 271-2888 Fax: (907) 271-2786

In Reply Refer To:
Project Code: 2022-0058547
Project Name: Aleknagik-Dillingham FOC

July 01, 2023

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

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and some candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Please note that candidate species are not included on this list. We encourage you to visit the following website to learn more about candidate species in your area:

http://www.fws.gov/alaska/fisheries/fieldoffice/anchorage/endangered/candidate_conservation.htm

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

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

threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

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

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

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

<https://www.fws.gov/birds/policies-and-regulations.php>

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

<https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>

In addition to MBTA and BGEPA, Executive Order 13186: Responsibilities of Federal Agencies to Protect Migratory Birds, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both

migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>

<http://www.towerkill.com>

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>

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

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
-

OFFICIAL SPECIES LIST

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

This species list is provided by:

Anchorage Fish & Wildlife Field Office

4700 Blm Road

Anchorage, AK 99507

(907) 271-2888

PROJECT SUMMARY

Project Code: 2022-0058547

Project Name: Aleknagik-Dillingham FOC

Project Type: Distribution Line - New Construction - Below Ground

Project Description: Project segment of Aerial installation.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@59.1544775,-158.63418604126628,14z>



Counties: Dillingham County, Alaska

ENDANGERED SPECIES ACT SPECIES

There is a total of 1 threatened, endangered, or candidate species on this species list.

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

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

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

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

BIRDS

NAME	STATUS
Steller's Eider <i>Polysticta stelleri</i> Population: AK breeding pop. There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1475	Threatened

CRITICAL HABITATS

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

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

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

There are migratory birds in your project area. Please refer to [Alaska's Bird Nesting Season](#) for recommendations to minimize impacts to migratory birds, including eagles.

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\)](#) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Aleutian Tern <i>Sterna aleutica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9599	Breeds May 1 to Aug 31
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Feb 1 to Sep 30

NAME	BREEDING SEASON
Bar-tailed Godwit <i>Limosa lapponica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Aug 15
Black Turnstone <i>Arenaria melanocephala</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Jul 31
Black-legged Kittiwake <i>Rissa tridactyla</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Bristle-thighed Curlew <i>Numenius tahitiensis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3913	Breeds May 15 to Aug 15
Common Loon <i>gavia immer</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/4464	Breeds Apr 15 to Oct 31
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31
Hudsonian Godwit <i>Limosa haemastica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Jul 31
Kittlitz's Murrelet <i>Brachyramphus brevirostris</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/1633	Breeds May 15 to Aug 31
Long-tailed Duck <i>Clangula hyemalis</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/7238	Breeds elsewhere
Olive-sided Flycatcher <i>Contopus cooperi</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3914	Breeds May 20 to Aug 31

NAME	BREEDING SEASON
Red-breasted Merganser <i>Mergus serrator</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Red-necked Phalarope <i>Phalaropus lobatus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds elsewhere
Short-billed Dowitcher <i>Limnodromus griseus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds Jun 1 to Aug 10

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

- The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very

helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of

certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

IPAC USER CONTACT INFORMATION

Agency: Travis/Peterson Environmental Consulting

Name: Jessica Knowles

Address: 326 Driveway Street

City: Fairbanks

State: AK

Zip: 99701

Email: jknowles@tpeci.com

Phone: 9074557225

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration

Overview Bald Eagle Nests

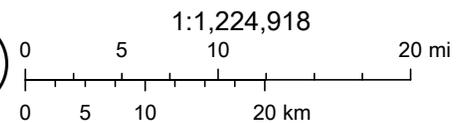


6/29/2023

- ★ Documented Eagle Nest Sites
- World Imagery
- Low Resolution 15m Imagery

- High Resolution 60cm Imagery
- High Resolution 30cm Imagery
- Citations

150m Resolution Metadata



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Earthstar Geographics, State of Alaska, Esri, HERE, Garmin, FAO, NOAA, USGS, EPA, NPS

Levelock Area Bald Eagle Nests

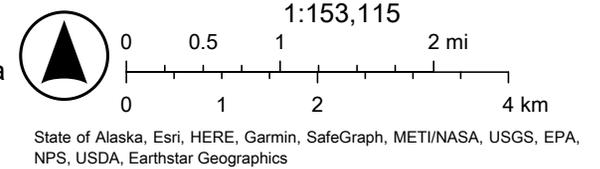


6/29/2023

- ★ Documented Eagle Nest Sites
- World Imagery
- Low Resolution 15m Imagery

- High Resolution 60cm Imagery
- High Resolution 30cm Imagery
- Citations

38m Resolution Metadata



Ekwok Area Bald Eagle Nests

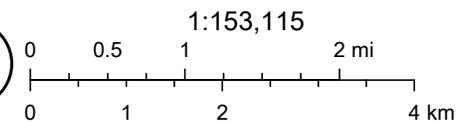


6/29/2023

- ★ Documented Eagle Nest Sites
- World Imagery
- Low Resolution 15m Imagery

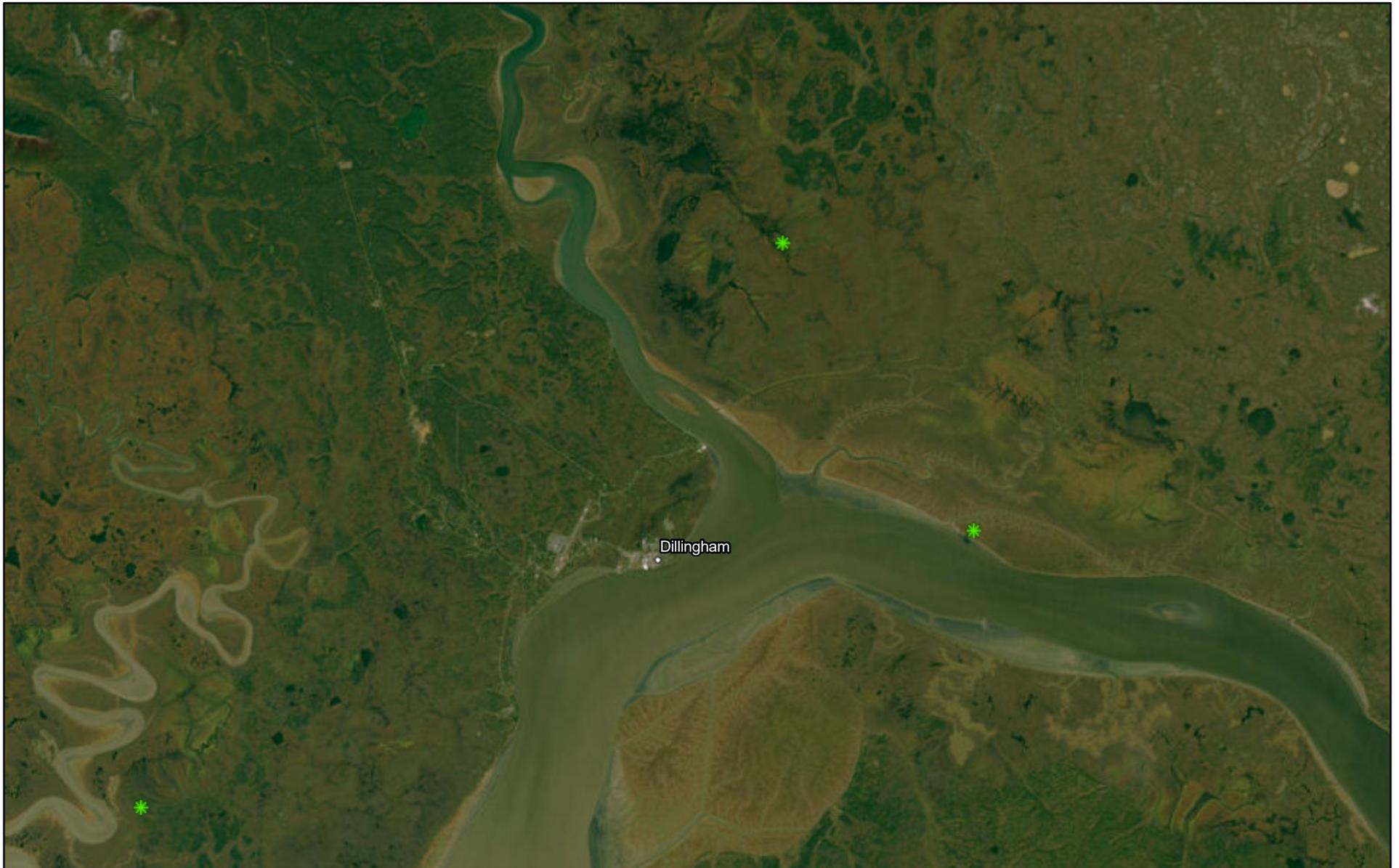
- High Resolution 60cm Imagery
- High Resolution 30cm Imagery
- Citations

38m Resolution Metadata



State of Alaska, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, Earthstar Geographics

Dillingham Area Bald Eagle Nests

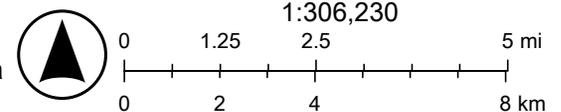


6/29/2023

-  Documented Eagle Nest Sites
- World Imagery
- Low Resolution 15m Imagery

- High Resolution 60cm Imagery
- High Resolution 30cm Imagery
- Citations

75m Resolution Metadata



1:306,230
Earthstar Geographics, State of Alaska, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

Appendix E

Historic and Cultural Resources

Section 106 Conclusion Memo USDA-RUS
Stephen R Braund & Associates 2023 Supplemental Report
12/5/2023 SHPO Concurrence

The Field Survey Reports contain information from the Alaska Heritage Resource Survey (AHRS) which is restricted by law to protect sensitive cultural sites against unauthorized disturbance. Access to the AHRS database and related information that would put sites at risk (i.e., coordinates and maps or texts that depict precise locations of archaeological sites) is withheld from the general public. Restricted or confidential site information is withheld from public records disclosure under Alaska state law (AS 40.25.110) and under the federal Freedom of Information Act (PL 89-554). The restriction of site inventory information is allowed by AS 40.25.120(a)(4), Alaska State Parks Policy and Procedure No. 50200, the National Historic Preservation Act (PL 89-665, 16 U.S.C. 470), and the Archaeological Resources Protection Act (PL 96-95).

Rural Development

Rural Utilities Service

1400 Independence
Ave SW, Room 2230
Stop 1570
Washington, DC
20250

Voice 202.695.2540

Section 106 Conclusion Memo

TO: Administrative Record File:
Nushagak Cooperative, Nushagak Fiber Project, Reconnect
Grant Program

FROM: Gregory Korosec

6/16/2022

SUBJECT: Section 106 Conclusion Memo, Finding of No Adverse Effect
Nushagak Fiber Project, ReConnect Grant Program
Levelock to Aleknagik, Alaska

Under the Rural Development Act, the Rural Utilities Service (RUS) is considering funding an application from Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative to construct the Nushagak Fiber Project, which will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska and include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road (Project) (see Enclosure A). As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the Iowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will also include FTTH upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier

to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. RUS has determined that this Project is an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. § 300101 et seq., and its implementing regulations, 36 CFR Part 800 (Section 106 review).

In accordance with 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review. Under this delegation, RUS may conclude Section 106 review on the basis of an agreement reached between Nushagak Cooperative, Alaska State Historic Preservation Office (SHPO) and other consulting parties on the recommended finding of effect.

On November 11, 2021 Nushagak Cooperative notified the following 12 Tribes of the project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. Following the initial notification, all but one tribal entity (City of Ekwok) expressed their interest in participating in ongoing consultation. On March 18, 2022, Nushagak Cooperative provided all Tribes with a finding letter (Enclosure B) and copies of Stephen R. Braund & Associates (SRB&A) cultural resource field survey report. A summary of tribal responses to the finding letter and follow-up attempts by Nushagak Cooperative is as follows:

- Letter Responses in Agreement with Finding - City of Dillingham
- Verbal Responses in Agreement with Finding or not Expressing Cultural Concerns - Ekwok Natives Ltd, Ekwok Village Council, BBNC, Choggiung Limited, City of Aleknagik
- No Response - City of Ekwok, Levelock Natives Limited, Levelock Village Council, Aleknagik Traditional Council, Aleknagik Natives Limited, Curyung Tribal Council

On December 15, 2021 the Alaska State Historic Preservation Officer (SHPO) was notified about the project and on April 26, 2022 the SHPO concurred on a finding of ‘No Adverse Effect’. The SHPO concurrence (see Enclosure C) was contingent on the following avoidance and minimization measures:

1. Complete avoidance of DIL-00267 through the use of HDD at the proposed crossing site.
2. Ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of

the Nushagak River in Ekwo; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within area of buried installation near Lake Aleknagik (illustrated in Map 10 of the associated survey report).

- a. A monitoring report meeting professional standards will be provided to our office within 6 months of the completion of fieldwork..

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE (Enclosure D). SRB&A conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwo Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the measures conditioned by SHPO. In addition Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Nushagak Cooperative will also incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities.

Based on review of the project documentation provided by Nushagak Cooperative, RUS has determined that a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for this undertaking. This finding will conclude Section 106 review process as it agrees with the recommendations of Nushagak Cooperative and SHPO concurrence on April 26, 2022.

There are no additional conditions to which Nushagak Cooperative and SHPO agreed to, to support this finding. **The commitment on the part of the Agency to their implementation is (Insert the Agency's Commitment)].** RUS will include an inadvertent discovery provision, developed in accordance with 36 CFR § 800.13(b) and (c), as a condition of obligation in order to address any historic properties which might be inadvertently discovered or affected during project construction.

Please direct any questions you may have and any responses to our request for consultation to Chris Gunn at 202-577-3525 (mobile) 202-720-2657 (desk) or via email at Christopher.Gunn@usda.gov.

Sincerely,

Greg Korosec, PhD, RPA

Archaeologist, USDA-RUS
Environmental and Historic Preservation Division

Enclosures

Enclosure A - Map 1: Nushagak Fiber Project Overview

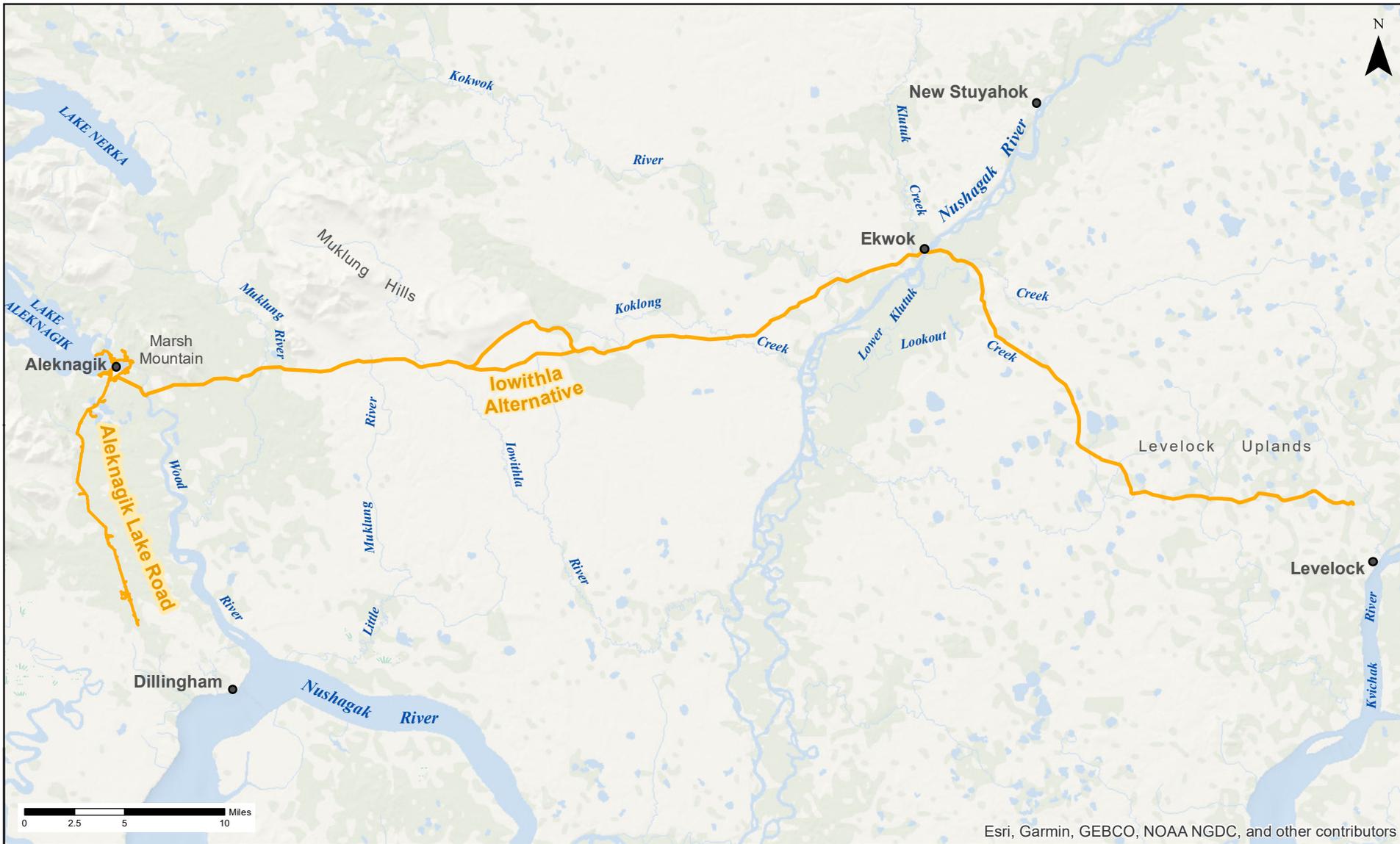
Enclosure B – Tribal Initiation and Finding Letters and City of Dillingham Written Response

Enclosure C – SHPO Concurrence

Enclosure D – Field Survey Report

Attachment

cc: Trung Vo, Nushagak Cooperative
Stephen Braund, SRB&A



Stephen R. Braund & Associates
 P.O. Box 10-1480
 Anchorage, Alaska 99510-1480
 (907) 276-8222 info@srbak.com

■ APE

SRB&A
 Stephen R. Braund & Associates

NUSHAGAK FIBER PROJECT OVERVIEW

MAP 1



Solutions for the Future

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557 Kenny Wren Road • P.O. Box 350 • Dillingham, AK 99576
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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
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Dillingham, AK 99576

11/12/2021

Lance Nunn
CEO
Aleknagik Natives Ltd.
P.O. Box 1630
Dillingham, AK, 99576

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Lance Nunn, CEO:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its ReConnect program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Aleknagik Natives Ltd. in Dillingham Census area. Should the Aleknagik Natives Ltd. elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative

Trung Vo
Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
(907) 842-5251
tvo@nushagak.coop

Stephen R. Braund & Associates

Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
(907) 276-8222
srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Trung Vo', with a stylized flourish extending to the right.

Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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SRB&A

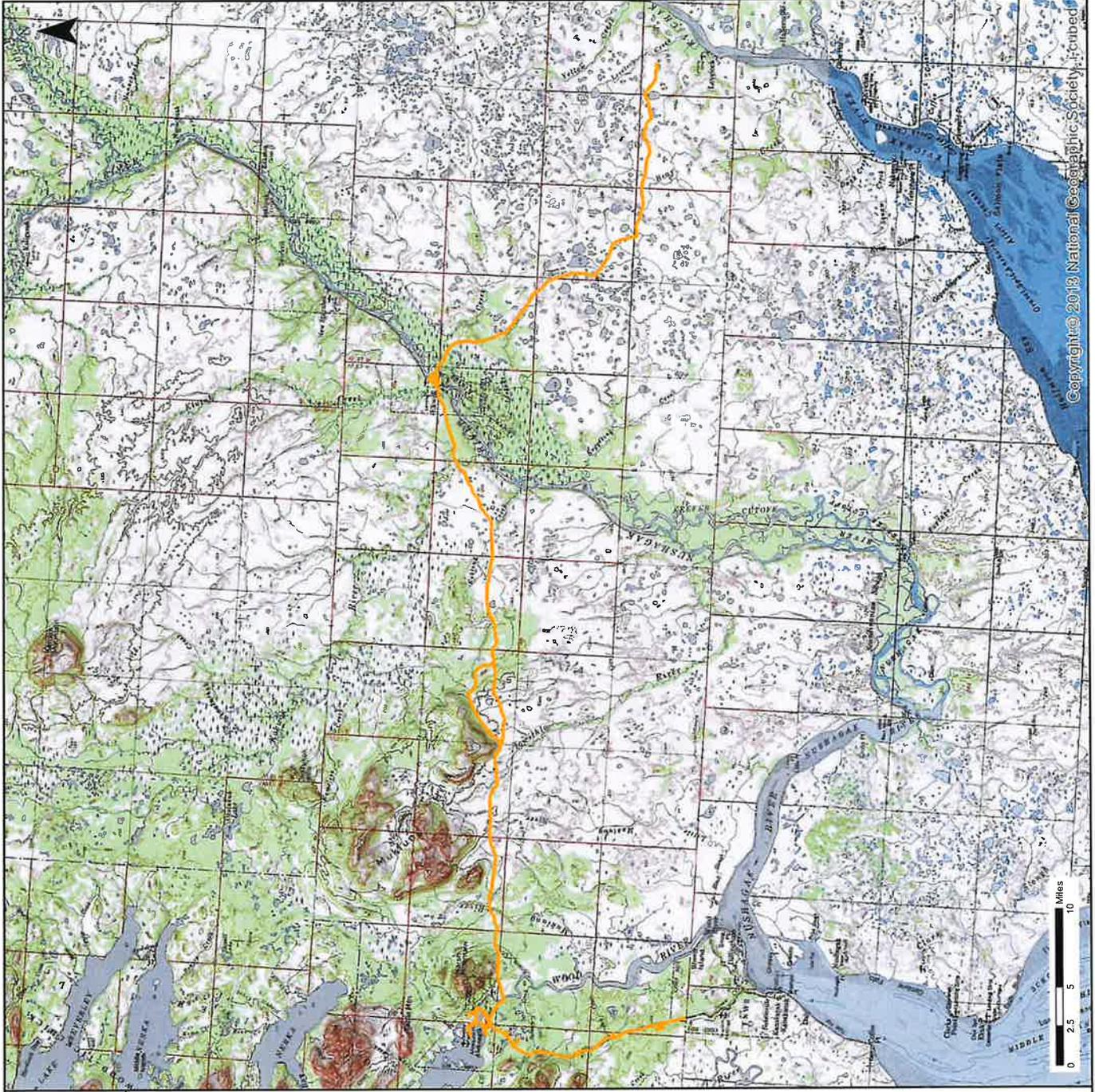
Stephen R. Braund & Associates

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Telecom Operations Manager
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Dillingham, AK 99576

11/12/2021

Allen Ilutsik
Tribal Administrator
Aleknagik Traditional Council
P.O. Box 115
Aleknagik, AK, 99555

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Allen Ilutsik, Tribal Administrator:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

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Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

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Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Aleknagik Traditional Council in Dillingham Census area. Should the Aleknagik Traditional Council elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

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Trung Vo
Telecom Operations Manager
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tvo@nushagak.coop

Stephen R. Braund & Associates
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Owner
PO Box 10-1480
Anchorage, AK 99510
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srb@srbak.com

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If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

A handwritten signature in blue ink, appearing to read 'TV', is positioned above the typed name and title.

Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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SRB&A

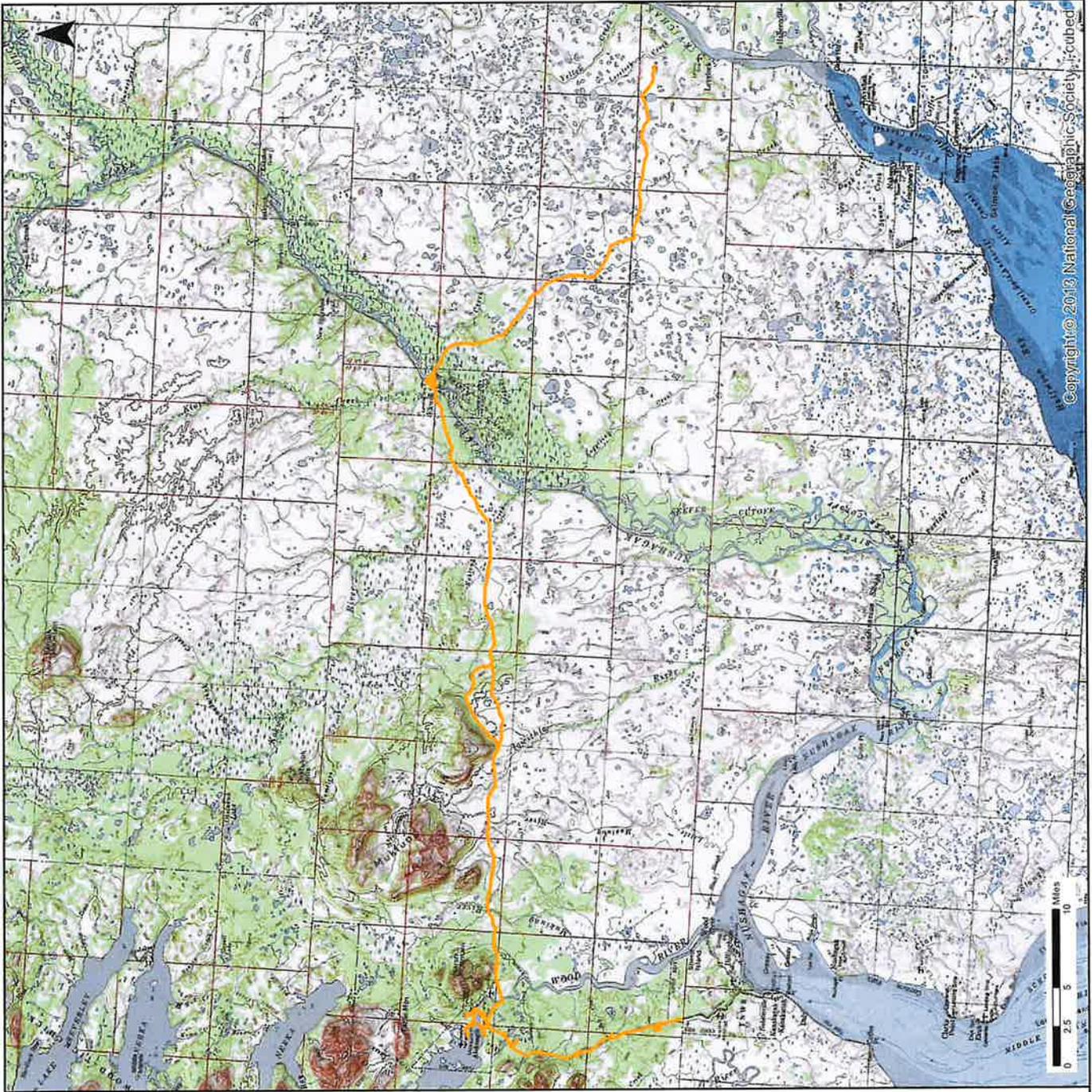
Stephen R. Braund & Associates

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
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Dillingham, AK 99576

11/12/2021

Francisca Demoski
Lands Department
Bristol Bay Native Corporation
111 W. 16th Avenue, Suite 400
Anchorage, AK, 99501

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Francisca Demoski, Lands Department:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

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Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Bristol Bay Native Corporation in Dillingham Census area. Should the Bristol Bay Native Corporation elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

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Telecom Operations Manager
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Stephen R. Braund & Associates

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Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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11/12/2021

Mark Bielefeld
Land Manager
Choggiung, Ltd.
P.O. Box 330
Dillingham, AK, 99576

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Mark Bielefeld, Land Manager:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

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Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its ReConnect program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Choggiung, Ltd. in Dillingham Census area. Should the Choggiung, Ltd. elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative

Trung Vo
Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
(907) 842-5251
tvo@nushagak.coop

Stephen R. Braund & Associates

Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
(907) 276-8222
srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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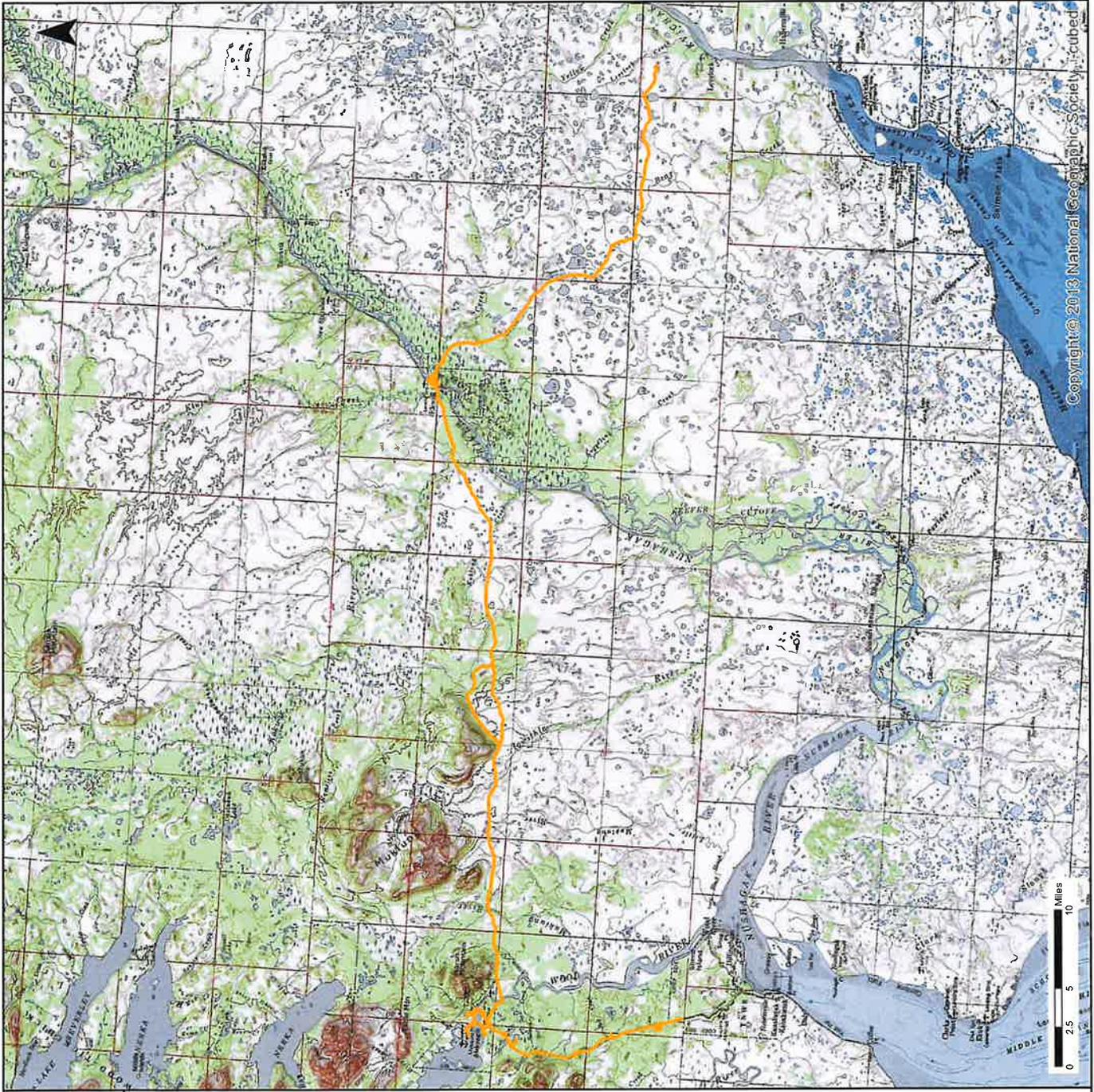
Stephen R. Braund & Associates

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
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Dillingham, AK 99576

11/12/2021

Kay Andrews
City Administrator
City of Aleknagik
P.O. Box 33
Aleknagik, AK, 99555

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Kay Andrews, City Administrator:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

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Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

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Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

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Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the City of Aleknagik in Dillingham Census area. Should the City of Aleknagik elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

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Telecom Operations Manager
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tvo@nushagak.coop

Stephen R. Braund & Associates
Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
(907) 276-8222
srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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Stephen R. Braund & Associates

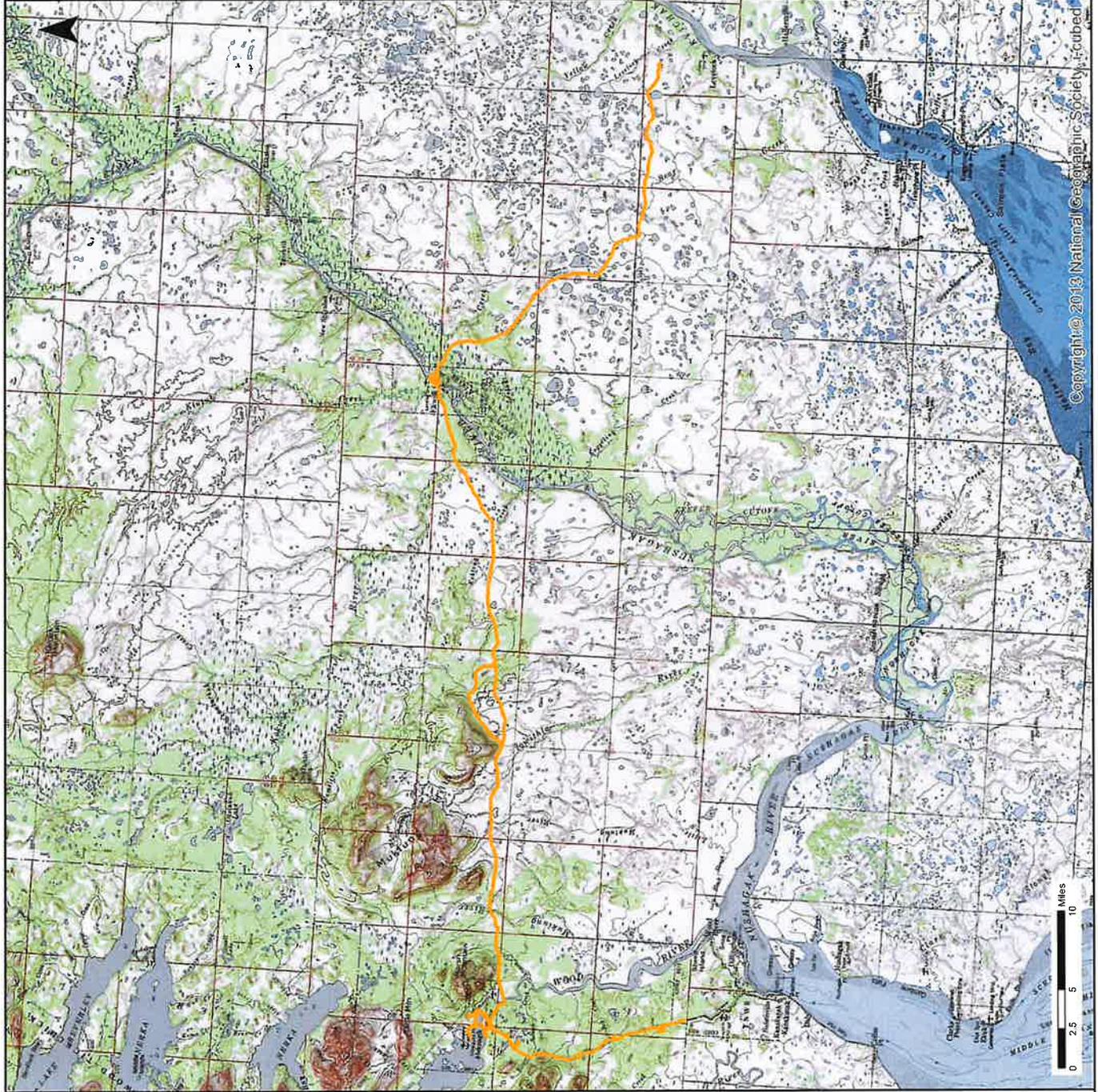
Map 1: Nushagak Fiber Project Overview



APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
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Post Office Box 350
Dillingham, AK 99576

11/12/2021

Cynthia Rogers
Planning Director
City of Dillingham
P.O. Box 889
Dillingham, AK, 99576

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Cynthia Rogers, Planning Director:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

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Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the City of Dillingham in Dillingham Census area. Should the City of Dillingham elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative

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Telecom Operations Manager
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Stephen R. Braund & Associates

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Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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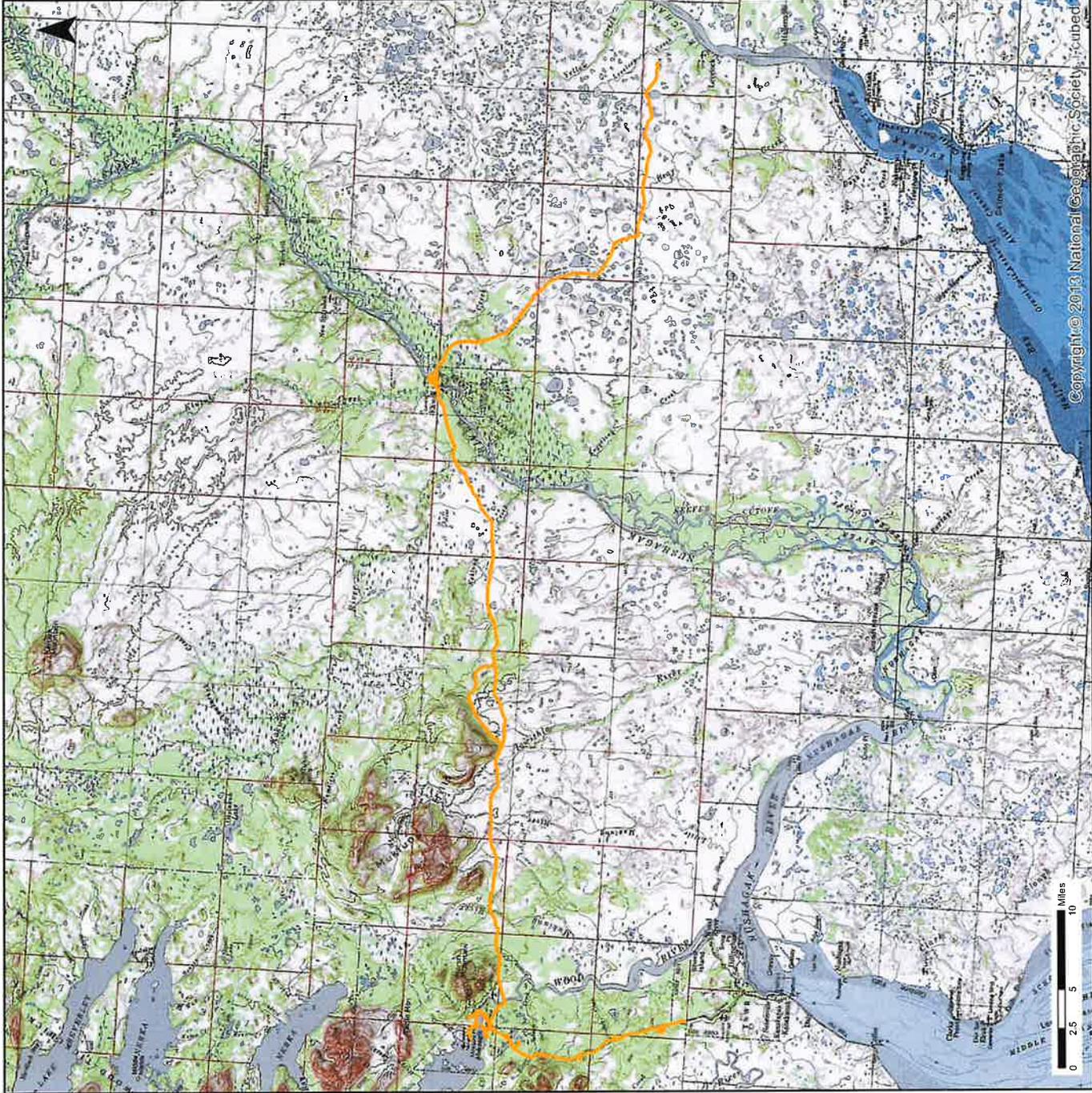
Map 1: Nushagak Fiber Project Overview



APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
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Post Office Box 350
Dillingham, AK 99576

11/12/2021

Crystal Jensen
City Administrator
City of Ekwok
P.O. Box 49
Ekwok, AK, 99580

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Crystal Jensen, City Administrator:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

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Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its ReConnect program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the City of Ekwok in Dillingham Census Area. Should the City of Ekwok elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative

Trung Vo
Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
(907) 842-5251
tvo@nushagak.coop

Stephen R. Braund & Associates

Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
(907) 276-8222
srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Trung Vo', with a stylized flourish at the end.

Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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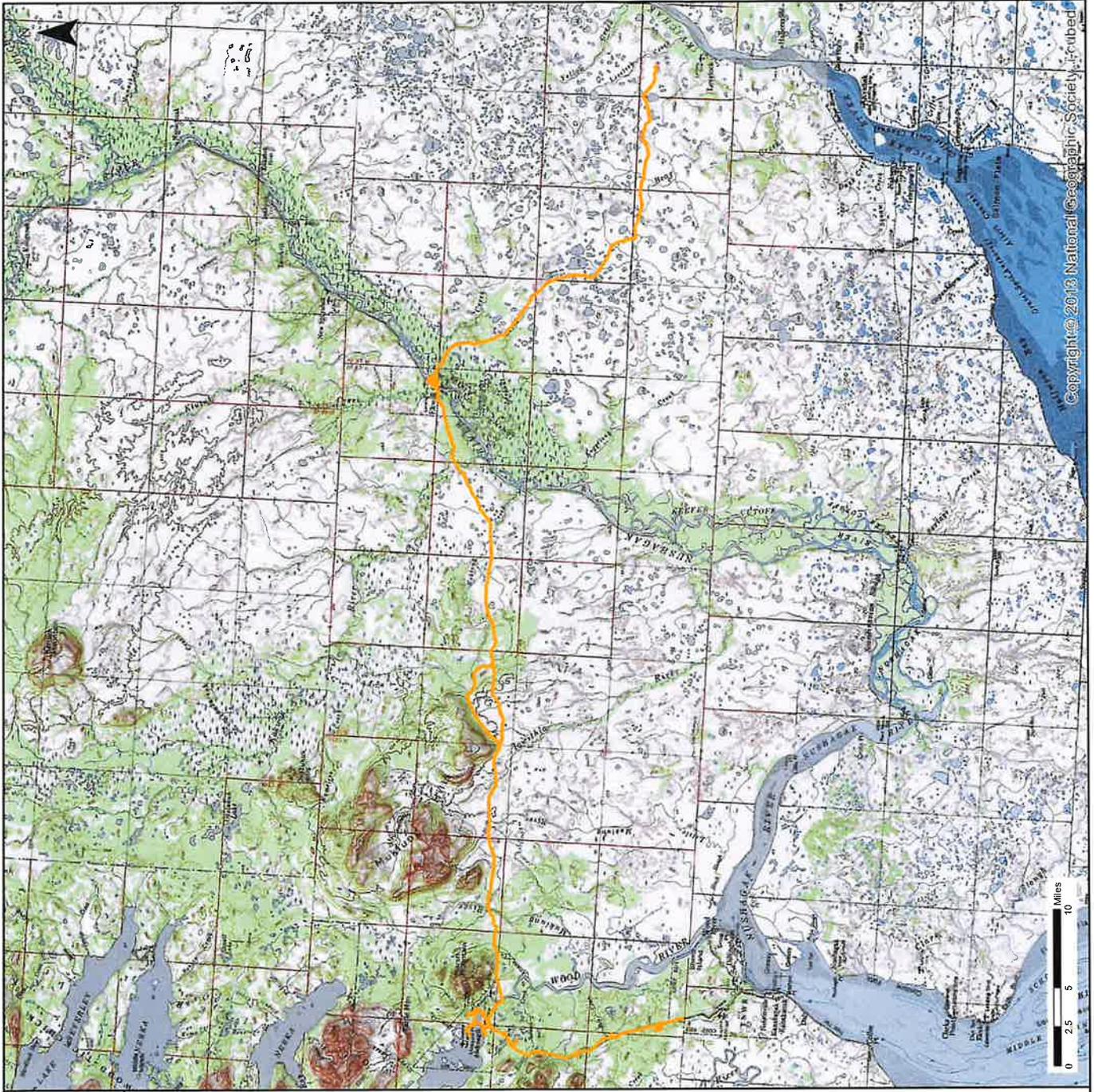
Stephen R. Braund & Associates

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Telecom Operations Manager
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Dillingham, AK 99576

11/12/2021

Desi Bond
Tribal Environmental Coordinator
Curyung Tribal Council
P.O. Box 216
Dillingham, AK, 99576

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Desi Bond, Tribal Environmental Coordinator:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its ReConnect program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Nushagak Cooperative is notifying you about the referenced project because of the possible interest of Curyung Tribal Council in Dillingham Census area. Should Curyung Tribal Council elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

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tvo@nushagak.coop

Stephen R. Braund & Associates
Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
(907) 276-8222
srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

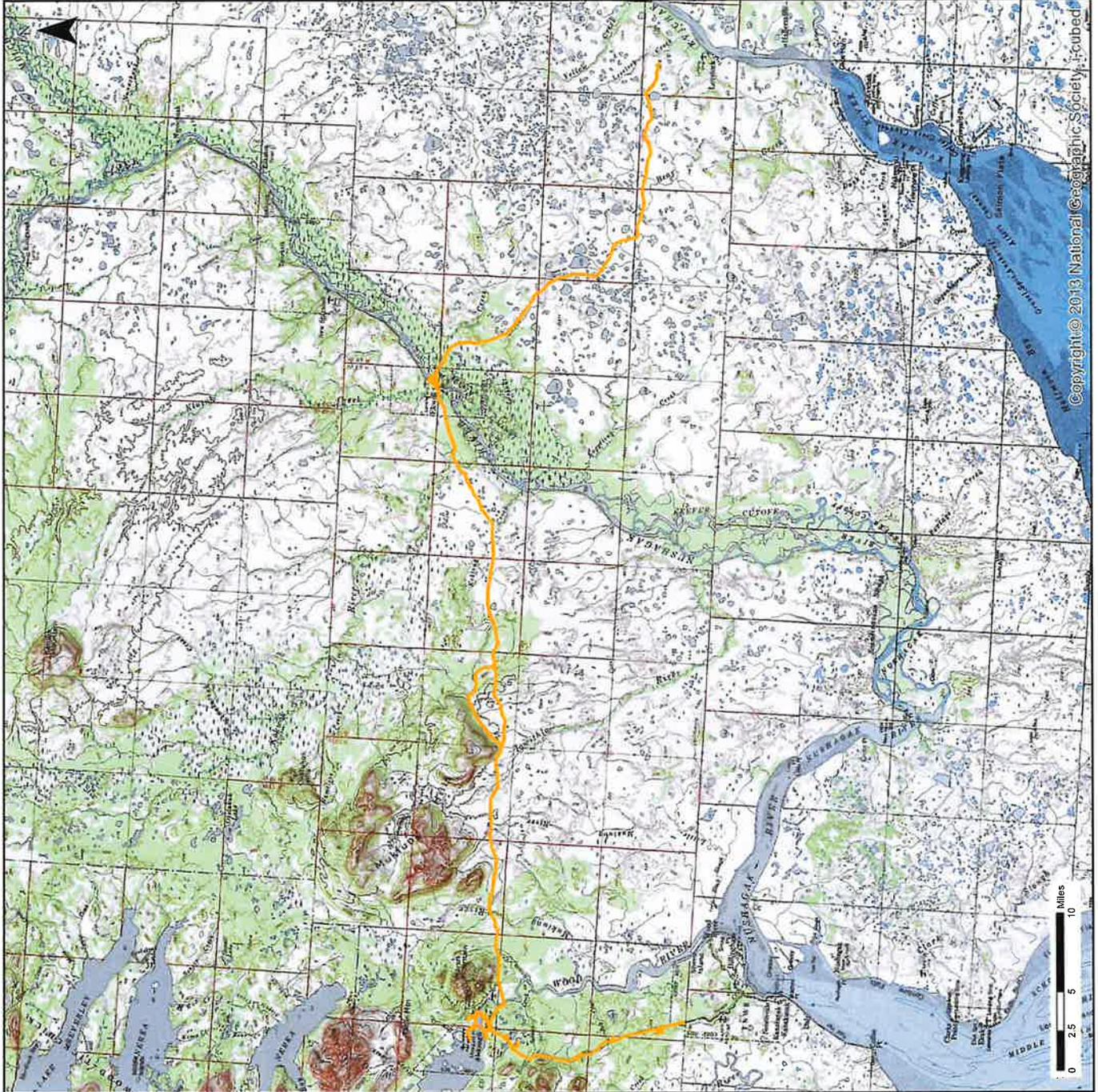
Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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Map 1: Nushagak Fiber Project Overview



Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
Post Office Box 350
Dillingham, AK 99576

11/12/2021

Luki Akelkok
President
Ekwok Natives Ltd.
P.O. Box 29
Ekwok, AK, 99580

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Luki Akelkok, President:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

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Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its ReConnect program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Ekwok Natives Ltd in Dillingham Census area. Should the Ekwok Natives Ltd elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative
Trung Vo
Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
(907) 842-5251
tvo@nushagak.coop

Stephen R. Braund & Associates
Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
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srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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SRB&A

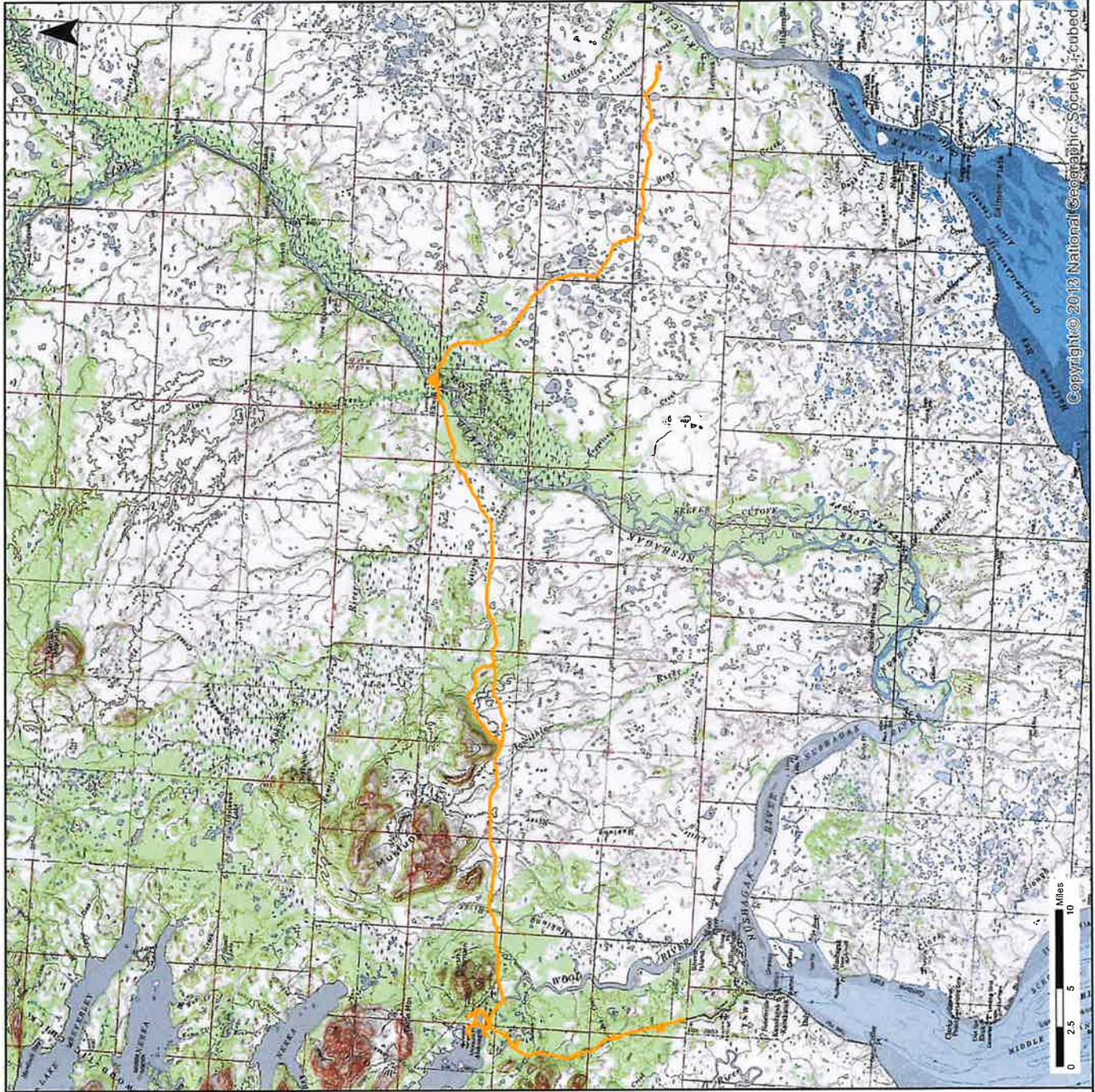
Stephen R. Braund & Associates

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
Post Office Box 350
Dillingham, AK 99576

11/12/2021

Richard King
Tribal Administrator
Ekwok Village Council
P.O. Box 70
Ekwok, AK, 99580

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Richard King, Tribal Administrator:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

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Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its ReConnect program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Ekwok Village Council in Dillingham Census area. Should the Ekwok Village Council elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative
Trung Vo
Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
(907) 842-5251
tvo@nushagak.coop

Stephen R. Braund & Associates
Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
(907) 276-8222
srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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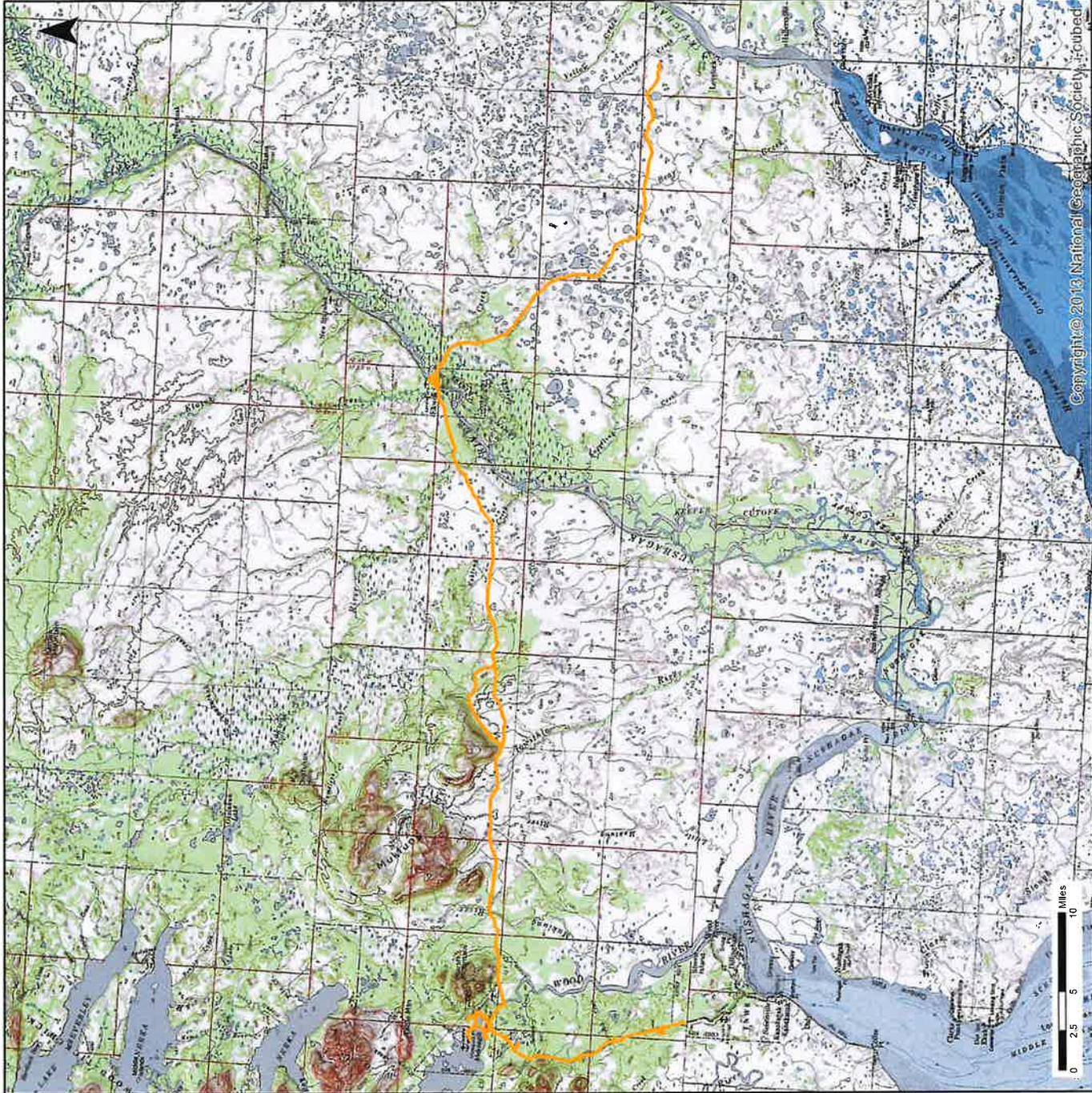


Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
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Dillingham, AK 99576

11/12/2021

Alexander Tallekpalek
President
Levelock Natives Ltd.
P.O. Box 109
Levelock, AK, 99625

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Alexander Tallekpalek, President:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

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Based on this definition, Nushagak Cooperative proposes that the APE for the referenced Project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. For FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

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Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Levelock Natives Ltd. in Dillingham Census area. Should the Levelock Natives Ltd. elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative
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Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
(907) 842-5251
tvo@nushagak.coop

Stephen R. Braund & Associates
Stephen Braund
Owner
PO Box 10-1480
Anchorage, AK 99510
(907) 276-8222
srb@srbak.com

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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SRB&A

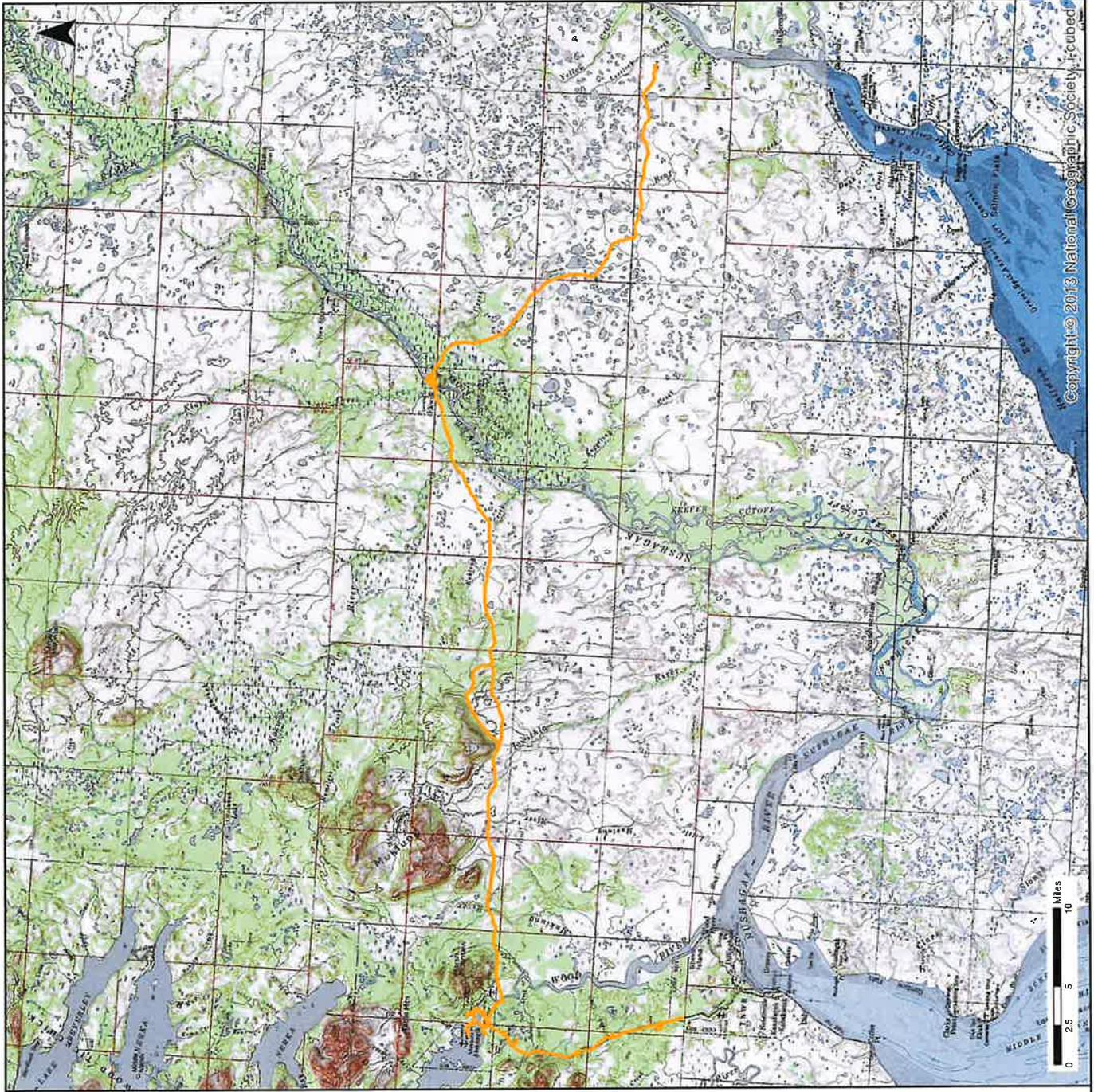
Stephen R. Braund & Associates

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
Post Office Box 350
Dillingham, AK 99576

11/12/2021

Alexander Tallekpalek
President
Levelock Village Council
P.O. Box 70
Levelock, AK, 99625

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utility Service Applicant Tribal Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Alexander Tallekpalek, President:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

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Nushagak Cooperative is notifying you about the referenced project because of the possible interest of the Levelock Village Council in Dillingham Census area. Should the Levelock Village Council elect to participate in Section 106 review of the referenced project, please notify Nushagak Cooperative and/or our cultural resources consultant in writing via letter or email as soon as possible at the following:

Nushagak Cooperative

Trung Vo
Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
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tvo@nushagak.coop

Stephen R. Braund & Associates

Stephen Braund
Owner
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Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Nushagak Cooperative will respect the confidentiality of the information which you provide to the fullest extent possible.

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Please submit your response **electronically** by 12/15/2021. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

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SRB&A

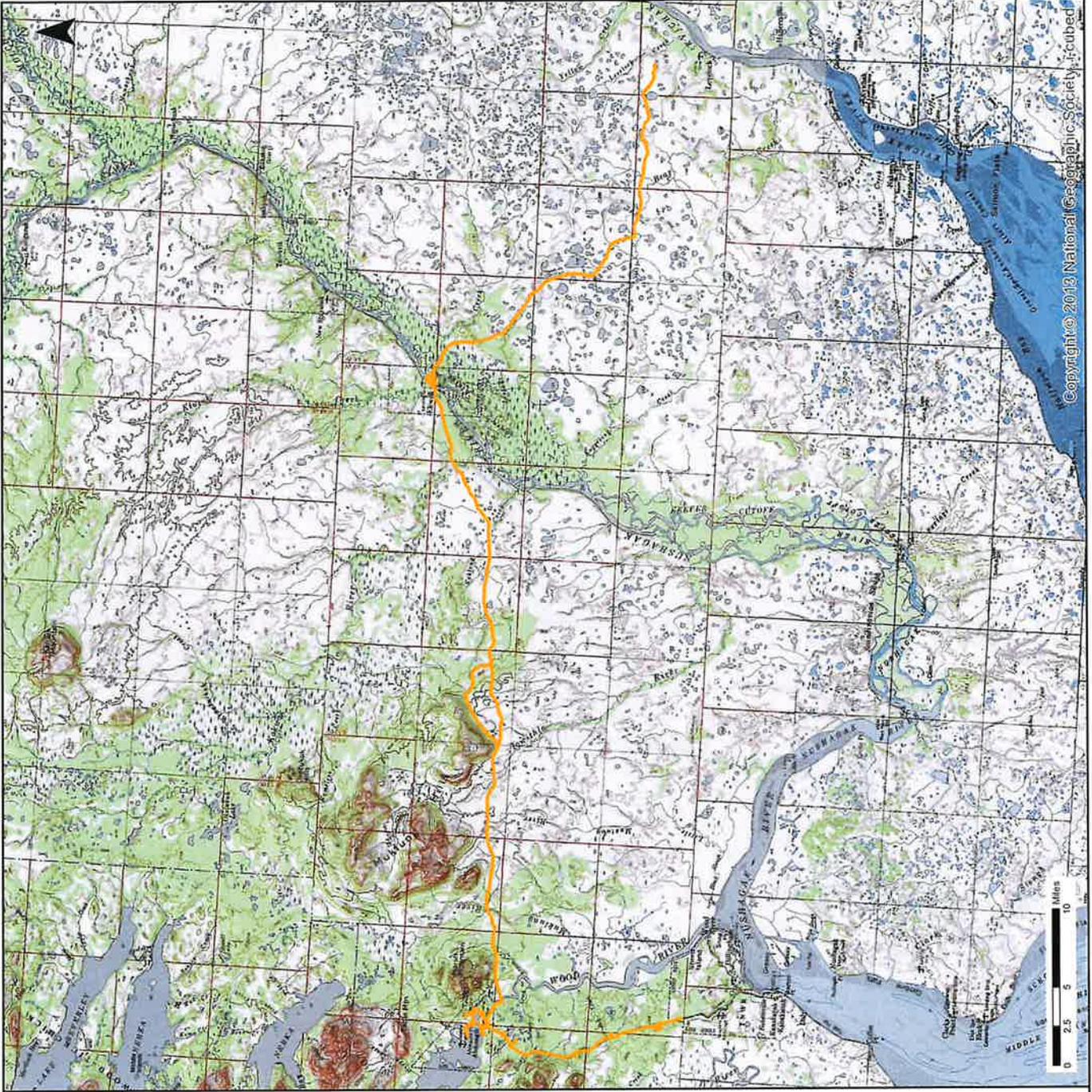
Stephen R. Braund & Associates

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
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Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology
550 West 7th Avenue, Suite 1310 Anchorage, Alaska 99501-3565
(907)-269-8715
Fax: 269-8908

12/15/2021

Subject: United States Department of Agriculture (USDA) – Rural Development (RD) Rural Utility Service Applicant SHPO Section 106 Initiation
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Ms. Bittner:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

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will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). "Indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Nushagak Cooperative proposes that the APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between

Levelock to Aleknagik, FTTH, and aerial line to Dillingham. . The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In accordance with this blanket delegation, Nushagak Cooperative is initiating Section 106 review on behalf of RUS. In delegating this authority, RUS is advocating for the direct interaction between its borrowers and the State Historic Preservation Office (SHPO). RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties earlier in project planning.

At the direction of RUS, on 11/15/2021 Nushagak Cooperative notified the following 12 Indian tribes about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. Stephen R. Braund & Associates (SRB&A) conducted follow-up consultations contacts with these entities during the week of November 22, 2021.

As you recall based on the August 3, 2021 meeting between RUS, SRB&A, and your office, Nushagak Cooperative has hired the services of cultural resource consultant SRB&A to conduct a literature review and evaluation level field survey of the APE. SRB&A plans to submit a report of the results of their field effort along with USDA’s recommended finding of effect for your office to review.

Please submit your recommendations, request for additional information, or a proposed finding, **electronically** within **30** days of your receipt of this request to:

Nushagak Cooperative
Trung Vo, Telecom Operations Manager
PO Box 350
Dillingham, AK 99576
(907) 842-5251
tvo@nushagak.coop

If no timely response is received Nushagak Cooperative will notify RUS so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4). Should you have any questions, please contact Trung Vo at the contact info above or RUS Environmental Protection Specialist Peter Steinour at 202.692.5346 or peter.steinour@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Map 1
CC: Stephen Braund, SRB&A, Anthropologist

This institution is an equal opportunity provider and employer.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

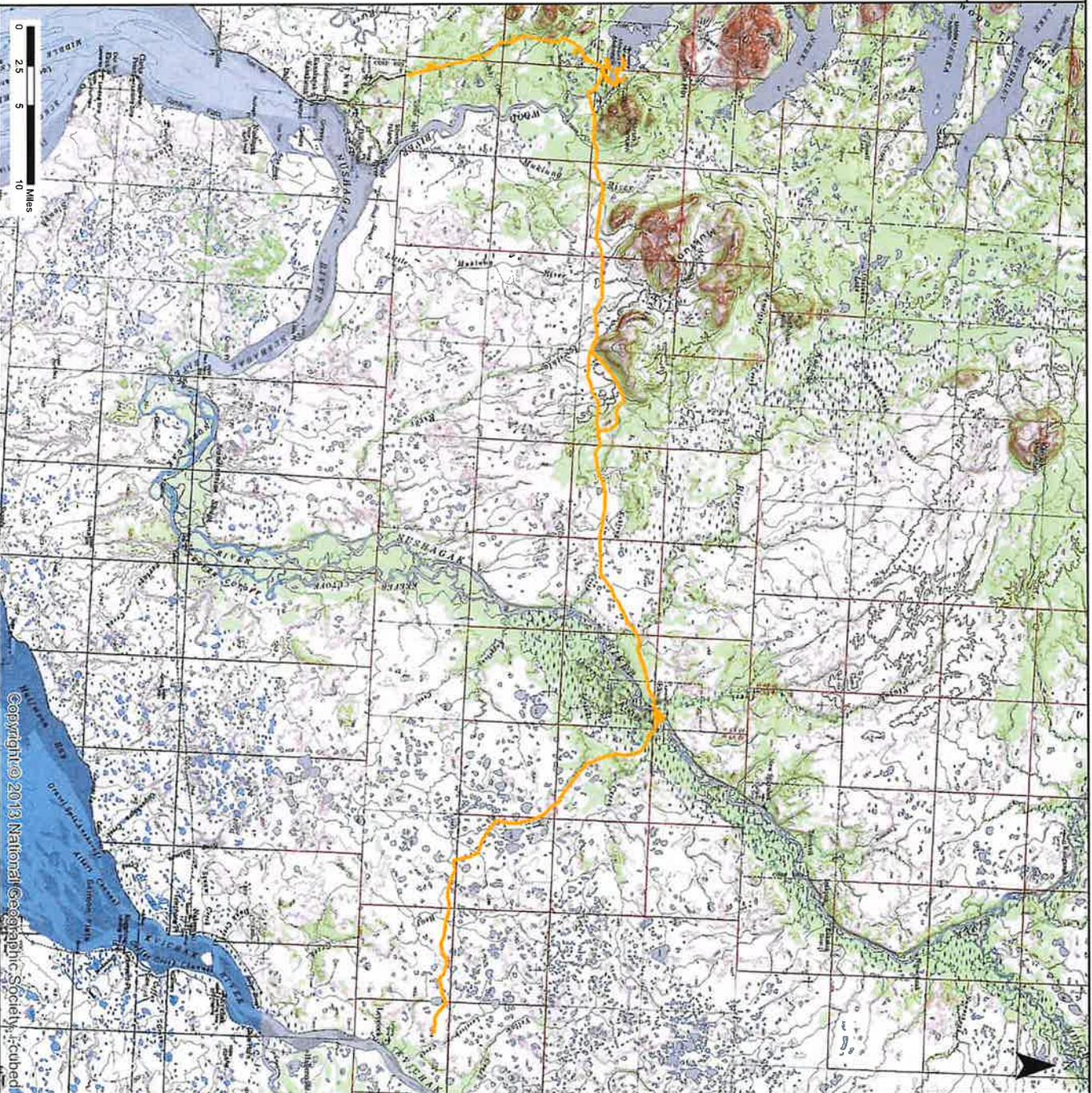
MAP 1 PLACEHOLDER

Map 1: Nushagak Fiber Project Overview

 APE

Project is in USGS Mapsheets Dillingham
A-3, A-4, A-7, A-8, B-4, B-5, B-6, B-7, and B-8.

Stephen R. Braund & Associates
P.O. Box 10-1480
Anchorage, Alaska 99510-1480
(907) 276-8222 info@srbak.com





Solutions for the Future

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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Allen Ilutsik
Tribal Administrator
Aleknagik Traditional Council
P.O. Box 115
Aleknagik, AK 99555

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Tribal Administrator Ilutsik:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will also include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative’s study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Aleknagik Traditional Council. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Dillingham, AK 99576

3/18/2022

Lance Nunn
CEO
Aleknagik Natives Ltd.
P.O. Box 1630
Dillingham, AK 99576

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear CEO Nunn:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will also include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative’s study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by Aleknagik Natives Ltd. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Francisca Demoski
Lands Department
Bristol Bay Native Corporation
111 W. 16th Avenue, Suite 400
Anchorage, AK 99501

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Francisca Demoski, Lands Department:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by BBNC. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Trung Vo', is positioned above the typed name and title.

Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



Solutions for the Future

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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Mark Bielefeld
Land Manager
Choggiung, Ltd.
P.O. Box 330
Dillingham, AK 99576

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Land Manager Bielefeld:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will also include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative’s study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by Choggiung, Ltd. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Trung Vo', with a stylized flourish at the end.

Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Kay Andrews
City Administrator
City of Aleknagik
P.O. Box 33
Aleknagik, AK 99555

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear City Administrator Andrews:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

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potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the City of Aleknagik. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Mark Lynch
Interim City Manager
City of Dillingham
P.O. Box 889
Dillingham, AK 99576

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear City Manager Lynch:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the City of Dillingham. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



Solutions for the Future

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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Desi Bond
Tribal Environmental Coordinator
Curyung Tribal Council
P.O. Box 216
Dillingham, AK 99576

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Desi Bond, Tribal Environmental Coordinator:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will also include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative’s study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

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The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Curyung Tribal Council. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Trung Vo', is positioned above the typed name.

Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Crystal Jensen
City Administrator
City of Ekwok
P.O. Box 49
Ekwok, AK 99580

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear City Administrator Jensen:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

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potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the City of Ekwok. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Trung Vo
Telecom Operations Manager
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3/18/2022

Luki Akelkok Sr.
President
Ekwok Natives Ltd.
P.O. Box 29
Ekwok, AK 99580

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear President Akelkok:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

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On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by Ekwok Natives Ltd. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



Solutions for the Future

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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Richard King
Tribal Administrator
Ekwok Village Council
P.O. Box 70
Ekwok, AK 99580

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear Tribal Administrator King:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will also include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small “drop plow” which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative’s study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Ekwok Village Council. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Trung Vo', is positioned above the typed name.

Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Alexander Tallekpalek
President
Levelock Natives Ltd.
P.O. Box 109
Levelock, AK 99625

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear President Tallekpalek:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth. Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed

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Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

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potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Levelock Natives Ltd. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



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Trung Vo
Telecom Operations Manager
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P.O. Box 350
Dillingham, AK 99576

3/18/2022

Alexander Tallekpalek
President
Levelock Village Council
P.O. Box 70
Levelock, AK 99625

Subject: USDA RD Rural Utility Service Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear President Tallekpalek:

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RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited.

On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00008 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of "No Adverse Effect" (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the

potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project's progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00009, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Levelock Village Council. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative's Proposed Nushagak Fiber Project (March 7, 2022)

CC: Stephen Braund, SRB&A, Anthropologist



February 18, 2022

Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, Alaska 99576-0350

Re: USDA Rural Utility Services Staff Finding of No Adverse Effects
Nushagak Fiber Project
Levelok to Aleknagik, Alaska.

Dear Mr. Vo;

Thank you for contacting the City of Dillingham. We reviewed the materials you provided for the proposed Nushagak Fiber Project from Levelok to Aleknagik, Alaska.

Based on the findings contained within the cultural resource survey report, we concur with your finding of no adverse effect.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36 CFR 800.3.

Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Mawson". The signature is fluid and includes a long horizontal flourish extending to the right.

Robert J. Mawson
City Manager
City of Dillingham
141 Main Street
Dillingham, Alaska 99576-0889



Solutions for the Future

Nushagak Electric & Telephone Cooperative, Inc.
557 Kenny Wren Road • P.O. Box 350 • Dillingham, AK 99576
Ph: 907-842-5251 • Fx: 907-842-2799 • www.nushtel.com

Trung Vo
Telecom Operations Manager
557 Kenny Wren Road
P.O. Box 350
Dillingham, AK 99576

3/18/2022

Judith Bittner
State Historic Preservation Officer
Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, Alaska, 99501-3565

Subject: USDA RD Rural Utility Service Staff SHPO Recommended Finding of No Adverse Effects
Nushagak Fiber Project
Levelock to Aleknagik, Alaska

Dear State Historic Preservation Officer Bittner:

Nushagak Electric and Telephone Cooperative, Inc. dba Nushagak Cooperative is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its ReConnect Grant Program for the Nushagak Fiber (Project). This Project will not be using the NPA.¹

Nushagak Cooperative's proposed Project will install buried fiber optic cable over approximately 75 miles from Levelock to Ekwok to Aleknagik, Alaska. As it relates to the buried portion of the fiber between Levelock to Aleknagik, the Project will be installed by a variety of methods, with method selection to be further refined in the field based on ground conditions encountered at the time. The width of the work zone will be 10 feet to accommodate the installation equipment. In general, the installation will include the use of tracked hydro-ax or other similar equipment to clear vegetation, if needed, along the route. This will be followed by tracked cable plows which will plow the cable into the ground at 18 to 24 inches in depth.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

Approximately 15 miles of the buried project at the west end near Aleknagik are comprised mostly of uplands and solid dry ground. Much of this work will be done under thawed conditions. The areas from the lowithla River east to Levelock are wetter and will be installed under frozen conditions to minimize impacts to the ground surface. The crossing of the Nushagak River at Ekwok will be completed under summertime conditions. The Project will also include Fiber to the Home (FTTH) upgrade in Aleknagik and along Aleknagik Lake Road. For FTTH purpose, approximately 10 percent of connections will require buried installation. With these connections, fiber will be brought down the existing power poles to a pedestal. From this pedestal, FTTH service cables will be plowed/trenched to the homes utilizing a small "drop plow" which places a cable at 12 to 18 inches deep. This cable will be routed alongside the buried electric service cable at most locations, so following a path of previous disturbance. Final routing of the cable to the residence will be coordinated with the landowner. From Aleknagik, the fiber line will be installed on approximately 21 miles of existing utility poles to Dillingham. The majority of this route has the pole line immediately adjacent to the road. Along much of the route, second-growth vegetation will need to be re-cleared. This work will precede installation of the fiber cable. The clearing work will occur along the previously disturbed and cleared path. Wherever the growth is small diameter vegetation (not suitable for use as firewood), it will be ground up or chipped in place, with the residual wood chips left on the ground surface as a natural protective barrier to improve erosion control from potential effects rainfall could have on bare dirt. For the installation of the new aerial fiber, the messenger and fiber cable can be driven along the road and pulled up into place utilizing pulleys. Work on the poles will be split between utilizing a bucket truck to lift personnel vs. linemen climbing the poles where terrain does not support the use of the truck. There are very limited areas of wetlands along this portion of the route so rutting from installation equipment will not be a concern. The purpose of the Project is to deliver high speed broadband internet service to the region with terrestrial and aerial installation of fiber cable to deliver connectivity to residences and businesses in Aleknagik and Dillingham. Those villages are part of Nushagak Cooperative study area to serve. This will also provide potential for growth in Bristol Bay Telephone Cooperative's study area for the villages of Levelock and Ekwok.

Because RUS has funded the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered "direct" regardless of its specific type (e.g., whether it is visual, physical, auditory,

etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of a 100-foot-wide corridor between Levelock and Aleknagik where ground disturbing activities are proposed to occur during the installation of the buried fiber optic cable. While the work zone will only be approximately 10 feet wide, the 100-foot corridor allows flexibility for in-field project design modifications. The Project will also include aerial installation on existing poles within the community of Aleknagik and to Dillingham. FTTH connections that require buried installation will have an 8-foot wide disturbance zone and trench 6 inches wide and 18 inches deep. The enclosed Map 1 shows the APE that encompasses the route between Levelock to Aleknagik, FTTH, and aerial line to Dillingham. Additionally, The APE includes the following tribal land(s) as defined pursuant to 36 CFR § 800.16(x): Aleknagik Natives Limited, Choggiung Limited, Ekwok Natives Limited, Ekwok Village, Levelock Natives Limited..

On 11/15/2021 the following Indian tribes were notified about the Nushagak Fiber Project: City of Dillingham, Curyung Tribal Council (Dillingham), Choggiung, Ltd., City of Aleknagik, Aleknagik Traditional Council, Aleknagik Natives Ltd., City of Ekwok, Ekwok Village Council, Ekwok Natives Ltd., Levelock Village Council, Levelock Natives Ltd., and BBNC. As of January 3, 2020, all but one party has expressed their interest in participating in ongoing consultation as the process moves forward. The remaining entity, the City of Ekwok, has not responded back to email and phone call follow-ups. To date, none of the consulting parties have identified any cultural resource concerns related to the Project, although a few indicated they would continue to research their files or bring the Project up at their next meeting and inform Nushagak Cooperative if cultural resource concerns arise.

The enclosed report titled, Cultural Resource Field Survey Report, Nushagak Cooperative’s Proposed Nushagak Fiber Project (March 7, 2022) describes the results of the survey of the APE. Stephen R. Braund & Associates (SRB&A) conducted 100 percent aerial survey and approximately 35 percent pedestrian survey with discretionary subsurface testing within the proposed FOC route APE between Levelock and Aleknagik. The remaining 65 percent of the APE consisted of large expanses of undifferentiated featureless terrain, wetlands, and/or floodplains that were determined to have low potential for possessing cultural resources and therefore did not require pedestrian survey and testing. The field crew excavated a total of 36 subsurface shovel tests of variable depths at locations with little or no surface exposure that were determined to have moderate-high potential for cultural resources. The field survey resulted in the identification of two previously unreported sites: the original Ekwok Village Dump site, which is part of DIL-00009 on the west bank of the Nushagak River, and DIL-00267, a prehistoric subsurface site on the east bank of the Wood River. No other cultural resources were identified within the APE during the field survey. Finally, windshield and pedestrian survey of the FOC connections in Aleknagik and along Aleknagik Lake Road identified areas where additional

utility infrastructure or subsurface installation will likely be necessary. To support the recommended finding of “No Adverse Effect” (36 CFR 800.5[b]) for the proposed Nushagak Fiber Project, Nushagak Cooperative will enact the following four measures to minimize the potential for their Project to cause adverse effects to historic properties. One, Nushagak Cooperative will avoid DIL-00267 site boundary through the use of HDD. Two, Nushagak Cooperative will continue to consult with Consulting Parties that have expressed interest in remaining informed of the proposed Project’s progress and involve these parties in any future discussions or consultations regarding effects to historic properties. Three, Nushagak Cooperative will ensure that an archaeological monitor who meets the Secretary of the Interior’s Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within the areas of buried installation near Lake Aleknagik due to the elevated archaeological potential of these areas. Four, Nushagak Cooperative will incorporate cultural resource awareness training, administered by SRB&A, into the training programs of all construction personnel or contractors prior to the commencement of construction activities. Based on the findings of the Cultural Resource Field Survey Report, Nushagak Cooperative’s Proposed Nushagak Fiber Project (March 7, 2022), a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the SHPO. Please provide your concurrence or objection, **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Greg Korosec, PhD, RPA Archaeologist, Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development at 716-238-0272 or email at gregory.korosec@usda.gov.

Sincerely,



Trung Vo
Telecom Operations Manager
Nushagak Cooperative

Enclosure(s): Cultural Resource Field Survey Report, Nushagak Cooperative’s Proposed Nushagak Fiber Project (March 7, 2022)
CC: Stephen Braund, SRB&A, Anthropologist



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION
Office of History & Archaeology

550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3561
907.269-8700
<http://dnr.alaska.gov/parks/oha>

April 26, 2022

File No.: 3130-1R RD/2022-00517

Gregory Korosec
United States Department of Agriculture
Rural Utilities Service, Rural Development
1400 Independence Avenue, SW | Mail Stop 1570
Washington DC, 20250
Gregory.Korosec@usda.gov

SUBJECT: Finding of No Adverse Effect Nushagak Fiber Project Levelock to Aleknagik, Alaska

Dear Mr. Korosec:

The Alaska State Historic Preservation Office (AKSHPO) received the subject request for concurrence on March 23rd, 2022 and additional information on April 5, 2022. Upon review, we concur that a finding of **no adverse effect** is appropriate for the proposed undertaking. This finding is contingent on the following avoidance and minimization measures:

1. Complete avoidance of DIL-00267 through the use of HDD at the proposed crossing site.
2. Ensure that an archaeological monitor who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology be present during ground disturbing activities occurring within 200ft of the west bank of the Nushagak River in Ekwok; within 500ft of DIL-00008, DIL-00064, and DIL-00169; and within area of buried installation near Lake Aleknagik (illustrated in Map 10 of the associated survey report).
 - a. A monitoring report meeting professional standards will be provided to our office within 6 months of the completion of fieldwork.

In addition, the correspondence and survey report indicate that cultural resource awareness training will be administered by SRB&A. We encourage this training for all on-ground personnel, please check our website to verify contact numbers and guidance materials are up to date <http://dnr.alaska.gov/parks/oha>.

Per *36 CFR 800.13(b)(3)*, should previously unidentified archaeological/historical resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register of Historic Places eligibility criteria (*36 CFR 60.4*) in consultation with our office.

As stipulated in *36 CFR § 800.3*, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations.

Thank you for the opportunity to comment and review. Please contact Mckenzie Johnson at 907-269-8726 or mckenzie.johnson@alaska.gov if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Judith E. Bittner".

Judith E. Bittner
State Historic Preservation Officer
JEB:msj

Section 106 Conclusion Memo USDA-RUS Enclosure D, Cultural Resource Survey
Report removed.

Stephen R Braund & Associates 2023 Supplemental Report removed.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION
Office of History & Archaeology

550 West 7th Avenue, Suite 1310
Anchorage, AK 99501-3561
907-269-8700
<http://dnr.alaska.gov/parks/oha>

December 5, 2023

File No.: 3130-1R NTIA/2023-01262

Andrew Bielakowski
United States Department of Commerce
National Telecommunications and Information Administration
Washington, D.C. 20230

SUBJECT: NTIA Staff Recommended Finding of No Adverse Effects for the Nushagak Fiber Project—Project Redesigns

Dear Mr. Bielakowski:

The Alaska State Historic Preservation Office (AK SHPO) received the subject supplemental information for the Nushagak Fiber Optic Project on October 14, 2023 for review under Section 106 of the National Historic Preservation Act (36 CFR 800). Upon review, we concur that a finding of **no adverse effect** is still appropriate for the undertaking. As noted in your correspondence, this finding is contingent on archaeological monitoring in several locations identified in the original documentation, and an additional 0.45mi. area in Aleknagik identified in the supplemental report. This letter also serves as acknowledgment that NTIA is now lead agency for the entire project due to RUS's removal of involvement.

Should previously unidentified archaeological resources be discovered during the project, regardless of whether an archaeological monitor is present or not, work must be interrupted until the resources have been evaluated using the National Register of Historic Places eligibility criteria (36 CFR 60.4) in consultation with our office.

As stipulated in 36 CFR § 800.3, other consulting parties such as the local government and Tribes are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations.

Thank you for the opportunity to review and comment. Please contact McKenzie Herring at 907-269-8726 or mckenzie.herring@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Judith E. Bittner".

JEB
Judith E. Bittner
State Historic Preservation Officer

JEB:msh

Appendix F
Human Health and Safety

Alaska Department of Environmental Conservation Contaminated Sites Maps

Overview ADEC Contaminated Sites

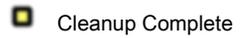


6/29/2023

Contaminated Sites



Active



Cleanup Complete



Cleanup Complete - Institutional Controls



Informational

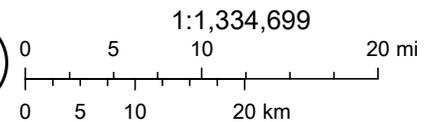


Populated Places

World Imagery

Low Resolution 15m Imagery

High Resolution 60cm Imagery



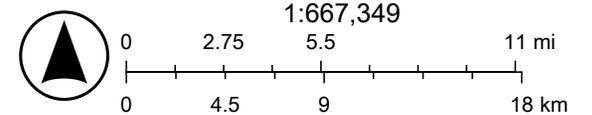
SOA DCCED DCRA, Earthstar Geographics, State of Alaska, Esri, HERE, Garmin, FAO, NOAA, USGS, EPA, NPS

Levelock to Ekwok ADEC Contaminated Sites



6/29/2023

Contaminated Sites ▲ Informational ● Populated Places
◆ Active



© 2023 Microsoft Corporation Earthstar Geographics SIO © 2023 TomTom, SOA DCCED DCRA, Earthstar Geographics

Ekwok Alaska DEC Contaminated Sites



6/29/2023

Contaminated Sites



Active



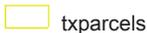
Cleanup Complete



Cleanup Complete - Institutional Controls



Informational



txparcels

condominiums

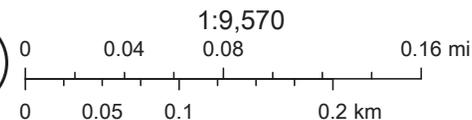
manufactured homes, etc

cell phone towers



parcels (light lines)

World Imagery



SOA DCCED DCRA, State of Alaska, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, Maxar

Aleknagik Alaska DEC Contaminated Sites



6/29/2023

Contaminated Sites

 Active

 Cleanup Complete



Cleanup Complete - Institutional Controls



Informational



txparcels

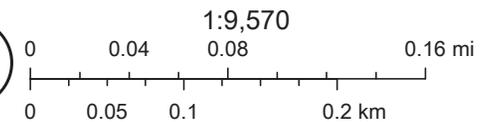
 condominiums

 manufactured homes, etc

 cell phone towers

 parcels (light lines)

World Imagery



SOA DCCED DCRA, State of Alaska, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, Maxar

SITE REPORT: ALEKNAGIK SCHOOL DAY TANK

SITE NAME: Aleknagik School Day Tank

ADDRESS: 574 Kenny Wren Road, Aleknagik, AK 99555

FILE
NUMBER: 2510.38.004

HAZARD ID: 26396

STATUS: Active

STAFF: Alena Voigt, 9072697556 alena.voigt@alaska.gov

LATITUDE: 59.281175

LONGITUDE: -158.626296

HORIZONTAL
DATUM: WGS84

We make every effort to ensure the data presented here is accurate based on the best available information currently on file with DEC. It is therefore subject to change as new information becomes available. We recommend contacting the assigned project staff prior to making decisions based on this information.

Problems/Comments

Historic releases were documented at the locations of a 100-gallon aboveground day tank and a 750-gallon aboveground tank and feeder tank at the Aleknagik School. Records are unclear with respect to locations of tanks; current 100-gallon aboveground tank may be at former location of replaced tanks. The school is located approximately 200 feet from the north shore of Aleknagik Lake. Corrective actions including excavation and landspreading of contaminated soil were completed during June 2008. Approximately 450 cubic yards of contaminated soil were removed from the source area and landspread at the City of Aleknagik landfill. The excavation limits in the source area have contaminant concentrations which remain above ADEC Method 2 cleanup levels for diesel range organics (DRO), gasoline range organics (GRO), benzene, ethylbenzene, and toluene. The excavation was stopped due to the proximity of the excavation to buildings and a 20,000-gallon aboveground storage tank. Landspread area performance monitoring began in 2011. A report submitted in December 2014 documented contaminant concentrations in the landspread contaminated soil below the applicable ADEC cleanup level for DRO. A Cleanup Complete designation of the excavated soil was requested. A drinking water well installed in 1986 serves the school; water was encountered at 67 feet below ground surface (bgs). Groundwater was encountered at 7 feet bgs during test pit investigation in 2007.

Action Information

ACTION DATE	ACTION	DESCRIPTION	DEC STAFF
10/26/1997	Update or Other Action	From Spill Response record prior to 2015: Spill report - 200 gallons diesel released beneath the school. The release was the result of a broken fuel line between an aboveground 750-gallon day tank and feeder tank. Case closed 8/9/2001. (Prevention, Preparedness and Response (PPR) Spill No. 97269929901.	Former Staff
12/30/1997	Document, Report, or Work plan Review - other	From Spill response record: Contractor's cost estimate and work plan dated 12/30/1997 in file, notes that for the Aleknagik fuel spill: test pits will be dug by band in several locations under the school. Soil samples will be collected from the test pits and field screened using a photoionization detector (PID). Based on the results of the field screening, a total of six samples will be collected for laboratory analysis. The samples will be tested for Diesel Range Organics (DRO) using Method AK 102 and Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) using EPA Method 8020.	Former Staff
3/12/2003	Document, Report, or Work plan Review - other	From Spill Response records: Letter dated 3/12/2003 from Rick Dallman, Director of Maintenance, Southwest Region Schools (responsible party) to ADEC stating that he spoke to the person who was principal at the site when the spill occurred."She recalls the spill to have been estimated at 180 gallons. Contaminated soil was removed with the city loader. She does not know where the soil was taken, but it was not left on school property. Contaminated soil was removed from the school crawl space and new vapor barrier installed. Air purifiers were used until the smell was gone. I estimated the soil that was removed at 7 to 10 cubic yards. The number of loader buckets taken away determined this estimation.	Former Staff
11/21/2005	Update or Other Action	From Spill Response records: 20 gallon spill reported resulting from electrical failure. Disposal by incineration. Case closed 12/01/2005.	Former Staff
9/28/2007	Document, Report, or Work plan Review - other	From Spill Response records: Bethel ADEC spill response received report and plan combination with subject line "Southwest Region School District Aleknagik School Spill Site Assessment and Corrective Actions Recommendations" prepared by Restoration Science and Engineering (RSE) and dated 9/28/2007. Analytical results and field observations show that fuel contamination associated with the fuel shed and day tank is more extensive than the record previously indicated. The report/plan states that "According to the	Former Staff

ADEC Oil & Hazardous Substance Spill Notification form, approximately 80 gallons of heating oil was released to the ground surface from a 100-gallon day tank at the Aleknagik School on November 21, 2005. Previous reports on the spill amount, cleanup, and recovery indicated that remaining soil impacts should be limited. However, during a recent site visit ADEC representative Bob Carlson recently used a photo-ionization detector (PID) and identified substantial hydrocarbon-impacted soil in areas under and around the fuel shed building that houses the day tank. Mr. Carlson also interviewed local residents some of which indicated that larger spill(s) may have occurred." Analytical results show that DRO, GO, benzene and each of the other BTEX components exceed cleanup levels. RSE also provided recommendations for a landspread area to remediate the excavated contaminated soil.

1/31/2008	Document, Report, or Work plan Review - other	From Spill Response records: Letter from spill response staff dated 1/31/2008 to Southwest Region Schools re "Final Report for 1997 Aleknagik Elementary School 200-gallon diesel fuel spill from fuel piping within the crawl space area." The letter notes that a final report has not been submitted, provides an enclosed copy of a form for the final report, and requests that additional sampling be done to include collecting confirmation analytical soil samples within the school crawl space, with the possibility that a review of the sampling results and the completed final report may lead to closing out the spill case.	Former Staff
6/6/2008	Document, Report, or Work plan Review - other	From Spill response record: Bethel spill response staff approved work plan by Restoration Science and Engineering (RSE) dated 5/28/2008 proposing landfarming 400-500 cubic yards of petroleum hydrocarbon impacted soil at the new, permitted Aleknagik Landfill, noting that verbal authorization was provided on 6/4/2008.	Former Staff
8/26/2008	Update or Other Action	From Spill response record: Report dated 8/26/2008 by Restoration Science & Engineering (RSE) "Southwest Region School District Aleknagik School Spill Corrective Actions." The report documents the removal by RSE, SWRSO personnel and City of Aleknagik equipment operators of contaminated soil from the source area beneath the former 100-gallon day tank shed. Contaminated soil above AOEC Method 2 soil cleanup levels still exists at the excavation limits shown in Figure 2 of the report. Contaminated soil excavation was limited by both underground and overhead utilities, the 20,000-gallon AST serving the school, and other	Eileen Olson

nearby infrastructure. Field investigation efforts were conducted on June 9, 2008 through June 11, 2008.

10/1/2013	Update or Other Action	From Spill response records: Closure of landspread soil at the landfill requested in report dated 10/1/2013 submitted to Bethel response staff "Landspread Performance Monitoring and Request for Closure of Post-Treatment Landspread Soils Derived from the Aleknagik School Day Tank Release Aleknagik, Alaska. The "Recommendations and Conclusions" section of the report notes that laboratory analytical data show that contaminant concentrations in the landspread contaminated soil remain moderately elevated above the applicable ADEC cleanup level for DRO but further states that "since soils are within a secured and lined landfill cell, closure of soils will not pose a threat to human health or the environment" and "The landspread area soils will remain in place and be allowed to return to natural vegetation. RSE formally requests a Cleanup Complete designation of the spill and soils excavated." No response to report found in file.	Former Staff
12/4/2014	Update or Other Action	From Spill response records: After additional monitoring, closure of landspread soil at the landfill requested in report dated 12/4/2014 submitted to Bethel response staff "Landspread Performance Monitoring and Request for Closure of Post-Treatment Landspread Soils Derived from the Aleknagik School Day Tank Release Aleknagik, Alaska." The report concludes that based on laboratory analytical data, contaminant concentrations in the landspread contaminated soil are less than the applicable ADEC cleanup level for DRO and RSE formally requests a Cleanup Complete designation of the spill and soils excavated.	Eileen Olson
3/16/2015	Update or Other Action	Contaminated sites involvement is based on the contamination remaining adjacent to and possibly beneath the school, and the pending closure of the soil that was remediated by landspreading. Requested that spill response provide any information in their files; none available other than database entries.	Eileen Olson
3/28/2015	Update or Other Action	Restoration Science and Engineering (RSE) emailed report dated 12/4/2014 requesting closure of the landspread area approved by spill response, titled "Landspread Performance Monitoring and Request for Closure of Post-Treatment Landspread Soils Derived from the Aleknagik School Day Tank Release, Aleknagik, Alaska." RSE notes that based on the total landspread soil volume of 450 cubic yards of soil, RSE collected a minimum of 25 field screening samples and	Eileen Olson

a total of five discrete analytical samples and one blind field duplicate as required for closure sampling of excavated soils in Table 2A of the ADEC Draft Field Sampling Guidance, May 2010.

5/15/2015	Site Added to Database	A new site has been added to the database	Mitzi Read
5/15/2015	Exposure Tracking Model Ranking	Initial ranking with ETM completed for source area id: 79769 name: 100-Gallon Aboveground Day Tank	Mitzi Read
9/4/2015	Document, Report, or Work plan Review - other	ADEC's issued a review letter dated 9/4/2015 with subject line "Request for Information" stating that ADEC did not receive a final report for the 1997 spill as requested in a letter by the spill response group dated 1/31/2008. ADEC states it concurs with the consultant's finding that the 450 cubic yards of landspread soil meet the cleanup levels for all petroleum hydrocarbons of concern (RRO, DRO, GRO and BTEX) but soil analysis for polynuclear aromatic hydrocarbons (PAH) is required as it has not been done at the source area or in the landspread soils. ADEC also requested that the potential for vapor intrusion into the school be evaluated, and provided a copy of ADEC's Building Inventory and Indoor Air Sampling Questionnaire to be returned by November 30, 2015. ADEC also requested that by November 30, 2015, the school district provide historical and current information regarding the heating oil system at the school, and provide any documentation of environmental work not previously submitted to ADEC.	Eileen Olson
11/30/2015	Document, Report, or Work plan Review - other	ADEC letter dated 11/30/2015 reviews the "Response to letter dated September 4, 2015 RE: Aleknagik School Day Tank Request for Information, ADEC Database Hazard ID No. 26396" by Restoration Science and Environmental (RSE) dated and received 11/24/2015. The report documents a site visit on 11/10/2015 during which additional field screening and analytical samples were collected from the source area and the landspread area at the Aleknagik landfill. ADEC's review letter notes that the requested PAH testing was performed with results below the applicable cleanup level and that, based on the results, ADEC finds that the landspread soil meets applicable cleanup levels and that determination will be incorporated into any future decision document issued for the site. Based on report results ADEC stated that no additional evaluation of vapor intrusion potential is required. Additional soil and groundwater characterization as the source area was requested, with a work plan requested by March 15, 2016 to include a schedule for completing field work by June 30, 2016.	Eileen Olson

3/23/2016	Document, Report, or Work plan Review - other	ADEC letter dated 3/23/2016 conditionally approves plan dated 3/18/2016 prepared by RSE for boring and monitoring well installation to further characterize contamination remaining at source area.	Eileen Olson
10/24/2017	Document, Report, or Work plan Review - other	ADEC letter dated 10/24/2017 reviewed the "Site Characterization Report, Aleknagik School Day Tank Site, October 2017" received on 10/22/2017. Characterization activities took place in May 2016 and included installation of ten soil borings to depths of 12 to 20 feet below ground surface (bgs) with three of the borings completed as groundwater monitoring wells. ADEC's letter concurred with consultant RSE's recommendation that further investigation at the site is needed to delineate the horizontal and vertical extent of the impacted area to the southwest of the former day tank shed that is the spill source; and to determine whether surface water has been impacted. ADEC requested a work plan for additional soil and groundwater characterization and monitoring of the three wells at the site by April 15, 2018, with work to begin by June 15, 2018. ADEC also approved a request to discharge groundwater monitoring well purge water currently on site to an upland area following filtration using a granular activated carbon filter.	Eileen Olson
9/20/2019	Workplan Requested	ADEC letter dated 9/20/2019 requested a work plan for the 2nd time from Rick Dallman of the Southwest Region School District. The Aleknagik School Day Tank requires further characterization to determine the extent of the contamination, and whether surface water has been impacted.	Randy Guintu
9/20/2019	Update or Other Action	Updated ETM to reflect the findings detailed in the Site Characterization Report, Aleknagik School Day Tank Site, October 2017.	Randy Guintu
5/20/2022	Site Characterization Workplan Approved	The ADEC reviewed and approved the "Aleknagik School Day Tank Additional Site Characterization Workplan", dated May 17, 2022 by Restoration Science & Engineering. Field investigation includes pore/surface water sampling, shoreline/hillside slope soil sampling, monitoring well sampling, and drinking water well sampling.	Alena Voigt

Contaminant Information

NAME	LEVEL DESCRIPTION	MEDIA	COMMENTS
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Control Type

TYPE

DETAILS

Requirements

DESCRIPTION

DETAILS

State of Alaska Department of Environmental Conservation

P.O. Box 111800

Juneau, AK 99811-1800

Phone: 907-465-5066

Fax: 907-465-5245

TDD: 800-770-8973

Physical Location: 410 Willoughby

SITE REPORT: ALEKNAGIK TRADITIONAL COUNCIL WASH.

SITE NAME: Aleknagik Traditional Council Wash.

ADDRESS: Washeteria Building; Lake and 3rd Streets, Aleknagik, AK 99555

FILE NUMBER: 2510.38.001

HAZARD ID: 2823

STATUS: Active

STAFF: Rebekah Reams, 9074512144 rebekah.reams@alaska.gov

LATITUDE: 59.277582

LONGITUDE: -158.623913

HORIZONTAL DATUM: WGS84

We make every effort to ensure the data presented here is accurate based on the best available information currently on file with DEC. It is therefore subject to change as new information becomes available. We recommend contacting the assigned project staff prior to making decisions based on this information.

Problems/Comments

Historical releases of heating oil from an above ground storage tank (AST) between 1990 and 2000 impacted the site. A nearby community water well has been sampled on several events and historic results found diesel range organic (DRO) above groundwater cleanup levels. Analytical samples collected from the on-site well in 2021 did not identify any analytes above ADEC cleanup levels. Site investigations have included soil sample collection, installation of monitoring wells, groundwater sampling, and a vapor intrusion evaluation. Groundwater monitoring conducted in 2021 reported groundwater cleanup level exceedances at AW-4 for DRO (55.4 mg/L), 1,2,4-trimethylbenene (63.4 µg/L), and naphthalene (38.9 µg/L). No other well reported contaminant concentrations above cleanup levels during this sampling event.

Action Information

ACTION DATE	ACTION	DESCRIPTION	DEC STAFF
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12/3/1998	Update or Other Action	In a letter from ADEC, the Aleknagik Traditional Council is requested to contact ADEC to provide any information that may be relevant to the investigation and cleanup of the community's drinking water supply.	David Pikul
1/29/1999	Update or Other Action	ADEC issued a letter as requested by the RP, providing an outline of the process for the development of a site characterization workplan.	David Pikul
3/25/1999	Update or Other Action	ADEC provided a letter as a reminder for the need of an environmental site investigation to be conducted in the area of the former fuel oil release near the washeteria building.	David Pikul
4/7/1999	Meeting or Teleconference Held	Meeting between ADEC, BBNA, and Bristol Environmental to discuss site conditions.	David Pikul
6/10/1999	Meeting or Teleconference Held	ADEC held a meeting with Bristol Environmental to discuss workplan development.	David Pikul
8/16/1999	Meeting or Teleconference Held	ADEC conducted a site visit and attended a tribal council meeting to inform the community with regards to the heating oil release and impacts to their well.	David Pikul
11/16/1999	Update or Other Action	ADEC issued a letter requesting that the RP provide their intentions for addressing investigation of the site.	David Pikul
11/29/1999	Site Added to Database	Petroleum contamination from the on-site heating oil tank.	David Pikul
11/30/1999	Site Ranked Using the AHRM	Not previously ranked in the database.	David Pikul
8/8/2000	Update or Other Action	ADEC issued a letter to the RP again requesting site characterization work plan submittal. A second release from the same AST happened last winter, contaminant concentrations in the drinking water at the site have increased and no action has been taken by the RP.	David Pikul
11/7/2000	Update or Other Action	Referral of Informal Cost Recovery Memorandum sent to Department of Law.	David Pikul
11/7/2000	Update or Other Action	ADEC issued a comment letter requesting work plan submittal.	David Pikul
4/2/2002	Update or Other Action	Preparing Request for Proposal to characterize site. Also, was informed that the Moravian Church next to the Washeteria had a diesel release of unknown quantity.	Lynne Bush

4/8/2002	Update or Other Action	Returned Cost Recovery invoice for changes - removing Dave Pikul's time at his request.	Lynne Bush
3/4/2004	Update or Other Action	DEC submitted RFP to contracts for site investigation.	David Pikul
4/28/2004	Meeting or Teleconference Held	DEC met with Bristol Env. to discuss initial proposal for site characterization. Revised proposal reducing costs and incorporating DEC comments expected in a few days.	David Pikul
5/5/2004	Update or Other Action	Completed review of final proposal and forward through channels. NTP approval form completed and sent on to Jim.	David Pikul
5/27/2004	Update or Other Action	Call from Jim (Bristol Environmental) regarding Aleknagik, will be on-site next Tuesday with full day of drilling on Wednesday.	David Pikul
6/3/2004	Update or Other Action	Call from Jim (Bristol) from the field in Aleknagik. Discussion included well placement. One well near the AST, one each off the west side corners of the building and one near the drinking water well. The boring off the SW corner was dry. No well to be placed and boring grouted to the surface.	David Pikul
6/30/2004	Update or Other Action	DEC completed review of the report titled: Aleknagik Washeteria Investigation Report, Aleknagik, Alaska dated June 2004. The report was approved for final with inclusion of the verbal comments. Site figure appears incorrect and was to be generated from an aerial photo purchased under contract. The washeteria building is parallel to the road. Data tables need to be QC'ed because units are incorrect. Also, DEC clean up levels should be added to the tables. Information gathered by Bristol personnel regarding site conditions and surroundings should be added to the report. (Information for the two DW wells and new tank, other personnel interviews with village contacts) A copy of the field notes was requested to be added as an appendix. Groundwater flow direction not included, should be added to site figure. Soil cuttings were shipped to Emerald for treatment/disposal, but no \$ was budgeted. Decision made without DEC notification and consideration.	David Pikul
2/23/2005	Update or Other Action	File number updated, issued 10/10/03.	Aggie Blandford
7/22/2005	Site Characterization Report Approved	Staff completed review of the document titled: Aleknagik Washeteria Investigation Report dated June 2004, submitted by Bristol Environmental on September 30, 2004. Groundwater in the immediate vicinity of the washeteria well is impacted by both DRO	David Pikul

and GRO. Fuel constituents were measured in tap water from the washeteria. The report failed to provide any information on the active washeteria well and the old well across the street. CSP staff met with DEC/DW staff to discuss the contaminated drinking water well. CS will hold for DW review and desicion.

12/4/2006	Update or Other Action	Spoke with Allen Ilutsik at the Aleknagik Traditional Council and informed him that the drinking water well appeared to be contaminated with fuel. He said that the Washeteria is not currently being used and that the water from the well is used only to flush the toilet and sometimes for washing, but all drinking water is brought in.	Bill O'Connell
7/20/2007	Exposure Tracking Model Ranking	Initial ranking with ETM completed for source area id: 73799 name: Petroleum impacted soils	Bill O'Connell
12/21/2010	Exposure Tracking Model Ranking	Ranking reviewed.	Bill O'Connell
6/27/2011	Site Visit	Site visit and monitoring well sampling at ATC Washeteria	Bill O'Connell
7/13/2011	Document, Report, or Work plan Review - other	Reviewed data report from 2011 groundwater sampling effort. Samples were collected from monitoring wells AW-3, AW-4, and AW-5 and also from drinking water wells at the washeteria and at a downgradient residence. Contaminants were not detected in monitoring well AW-3, DRO was detected at 431 mg/L in AW-4 and at 6.24 mg/L in AW-5. Samples from drinking water wells did not contain detectable concentrations of contaminants, except at the washeteria well, where dichlorodifluoromethane (Freon) was detected at 1.59 ug/L (cleanup level is 7.3 mg/L). This detection is not considered to be related to fuel contamination at the site.	Bill O'Connell
3/25/2014	Update or Other Action	Checked Drinking Water Program's GIS map to confirm that apparently upgradient or almost a mile away cross gradient are recorded there as drinking water sources rather than the washeteria location.	Keather McLoone
6/27/2017	Site Visit	ADEC Staff preformed a site visit on June 22,2017. Staff noted that there was stained soil and diesel odor in an excavation near the building where the spill originally occurred, close to the building. Staff collected one VOC sample from the water faucet of the Aleknagik native store samples from monitoring wells, as well as monitoring wells AW-3, AW-4, and AW-5. A slight petroleum odor and a light unmeasureable sheen was noted on AW-4	Chelsy Passmore

10/5/2017	Document, Report, or Work plan Review - other	Reviewed laboratory data from June 2017 Sampling event. Monitoring Well AW-4 contained Diesel Range Organics (DRO), and Polyaromatic Hydrocarbons (PAHs) above ADEC Table C Cleanup levels, as well as detectable concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX). Monitoring Wells AW-3 and AW-5 had detectable concentrations of GRO, DRO, BTEX and PAHs below ADEC Table C cleanup levels.	Chelsy Passmore
4/6/2018	Potentially Responsible Party/State Interest Letter	The ADEC sent a state interest letter explaining the results of the state led sampling in June 2017. The ADEC recommended that the water from the washeteria well not be consumed or used for potable purposes, and requested information regarding the excavation outside the washeteria.	Chelsy Passmore
8/18/2020	Document, Report, or Work plan Review - other	The Groundwater Monitoring Work Plan was submitted by SLR on August 18, 2020. Work conducted under this work plan is scheduled for the 2021 field season.	Rebekah Reams
3/19/2021	Site Characterization Workplan Approved	DEC approved the Groundwater Monitoring Work Plan following comment resolution. This work plan outlines plans to inspect the onsite aboveground storage tank (AST), complete a vapor intrusion survey, install two monitoring wells, and collect analytical samples from soil, groundwater, and two existing drinking water wells. Work conducted under this work plan is scheduled for the 2021 field season.	Rebekah Reams
12/9/2021	Exposure Tracking Model Ranking	A new updated ranking with ETM has been completed for source area 73799 Petroleum impacted soils.	Rebekah Reams
12/16/2021	Site Characterization Report Approved	The 2021 Release Delineation and Groundwater Monitoring Report has been finalized following comment resolution. This report outlines the inspection of the onsite aboveground storage tank (AST), a vapor intrusion survey, installation of two monitoring wells, and collection of analytical samples from soil, groundwater, and two existing drinking water wells. Soil samples collected at newly installed wells AW-6 and AW-7 reported all analytes were not detected or were below cleanup levels. Analytical samples were collected from two drinking water wells and on-site monitoring wells AW-1, AW-3, AW-4, AW-5, and AW-6. Monitoring well AW-7 could not be sampled because the well was dry. Analytical results from all drinking water wells and monitoring wells were below cleanup levels for all analytes, with the exception of AW-4. Diesel range organics (DRO) 1,2,4-trimethylbenzene, and naphthalene exceeded cleanup levels in samples	Rebekah Reams

from AW-4 at concentrations of 55.4 mg/L, 63.4 µg/L,
and 38.9 µg/L, respectively.

Contaminant Information

NAME	LEVEL DESCRIPTION	MEDIA	COMMENTS
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Control Type

TYPE	DETAILS
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Requirements

DESCRIPTION	DETAILS
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State of Alaska Department of Environmental Conservation

P.O. Box 111800
Juneau, AK 99811-1800
Phone: 907-465-5066
Fax: 907-465-5245
TDD: 800-770-8973

Physical Location: 410 Willoughby

Dillingham ADEC Contaminated Sites



6/29/2023

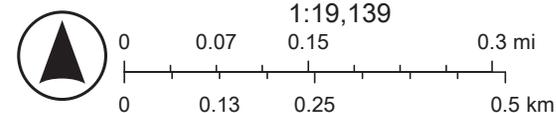
Contaminated Sites

- ◆ Active
- Cleanup Complete



- Cleanup Complete - Institutional Controls
- World Imagery
- Low Resolution 15m Imagery

High Resolution 60cm Imagery
 High Resolution 30cm Imagery
 Citations



SOA DCCED DCRA, State of Alaska, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, Maxar

SITE REPORT: C & L TESORO

SITE NAME: C & L Tesoro

ADDRESS: 1610 Kanakanak Road, Dillingham, AK 99576

FILE
NUMBER: 2540.26.012

HAZARD ID: 26135

STATUS: Active

STAFF: Dawn Wilburn, 9072628200 dawn.wilburn@alaska.gov

LATITUDE: 59.043202

LONGITUDE: -158.498773

HORIZONTAL
DATUM: WGS84

We make every effort to ensure the data presented here is accurate based on the best available information currently on file with DEC. It is therefore subject to change as new information becomes available. We recommend contacting the assigned project staff prior to making decisions based on this information.

Problems/Comments

On 9/12/13 petroleum-contaminated soil was encountered during the removal of two 5,000-gallon unleaded gasoline registered underground storage tanks (USTs #1 & #2) at C & L Tesoro in Dillingham. Approximately 70 cubic yards of contaminated soil were excavated and stockpiled on site. Remaining contamination has not been fully characterized.

Action Information

ACTION DATE	ACTION	DESCRIPTION	DEC STAFF
10/11/2013	Site Added to Database	A new site has been added to the database	Mitzi Read
10/11/2013	Spill Transferred from Prevention Preparedness and Response Program	Spill transferred by PERP staff Shannon DeWandel. Spill no. 13269925501; spill date = 9/12/13; substance = unleaded gasoline; quantity = unknown; source = two	Mitzi Read

		5,000-gallon registered underground storage tanks #1 and #2, UST facility ID 917.	
10/11/2013	Leaking Underground Storage Tank Release Confirmed - Petroleum	LUST site created in CSP database for source area Two 5,000-Gallon Gasoline USTs #1 & #2, 79527	Mitzi Read
10/11/2013	Exposure Tracking Model Ranking	Initial ranking with ETM completed for source area id: 79527 name: Two 5,000-Gallon Gasoline USTs #1 & #2	Mitzi Read
10/28/2013	Potentially Responsible Party/State Interest Letter		Katrina Chambon
2/12/2014	Exposure Tracking Model Ranking	A new updated ranking with ETM has been completed for source area 79527 Two 5,000-Gallon Gasoline USTs #1 & #2.	Katrina Chambon
3/11/2014	Document, Report, or Work plan Review - other	In September 2013, two 5,000 gallon gasoline underground storage tanks, dispenser, and associated piping was removed. Approximately 70 cubic yards of contaminated soil was placed in super sacks and is currently stored on site. A total of nine soil samples were collected from the excavation and analyzed for gasoline range organics (GRO), benzene, toluene, ethylbenzene, xylenes, and naphthalene. Contamination remains in the base of the excavation. GRO concentrations range from non-detect to 986 mg/kg, benzene concentrations range from non-detect to 3.7 mg/kg, and toluene concentrations range from 0.0477 mg/kg to 14.5 mg/kg. Based on a review of the report, the following information needs to occur before this site can be considered for closure:1.The nature and extent of soil and groundwater contamination must be adequately delineated. 2.A conceptual Site Model (CSM) is required that satisfactorily demonstrates that there is no risk to human health or the environment.	Katrina Chambon
3/27/2014	Leaking Underground Storage Tank Cleanup Initiated - Petroleum	Administrative action addition for grant reporting purposes.	Evonne Reese
6/11/2014	Document, Report, or Work plan Review - other	The Alaska Department of Environmental Conservation (ADEC) received and reviewed the Site Characterization Work Plan and the Landspreading Work Plan for the C&L Tesoro site. The work plans proposed to advance between 6 and 10 soil borings to delineate the nature and extent of contamination, install three temporary monitoring wells, one permanent monitoring well, and land spread the previously stockpiled material at a proposed location. The Contaminated Sites Program (CSP) did not object to	Joshua Barsis

the work; however, requested that one of the water samples be submitted for lead analysis.

2/5/2015	Document, Report, or Work plan Review - other	Reviewed the Site Characterization Report, dated January 28, 2015. Six soil boring were advanced at this site in August 2014 to better delineate the extent of contamination, and to investigate the potential impacts to groundwater. Most of the borings consisted of a gravely material in the top four feet, followed by clay down to about 18 feet below ground surface (bgs). The deepest boring was advanced to 27 feet bgs. Many of the boring exhibited moisture, but were not saturated, and did not produce necessary levels of water. Therefore, water samples were not collected during this investigation. At least one soil sample from every soil boring was submitted for laboratory analysis of gasoline range organics (GRO), and benzene, toluene, ethylbenzene, and xylenes (collectively known as BTEX). All sample results were below laboratory detection limits and/or ADEC cleanup levels. In addition to the soil boring investigation, water samples were collected from two nearby drinking water wells (DWWs) by the property owner in January 2015. Contamination was not identified in either DWW.	Joshua Barsis
2/5/2015	Exposure Tracking Model Ranking	A new updated ranking with ETM has been completed for source area 79527 Two 5,000-Gallon Gasoline USTs #1 & #2.	Joshua Barsis
6/2/2015	Site Visit	Performed site visit; observed stockpile. Stockpile was covered, but was well maintained located off an abandoned airstrip.	Joshua Barsis
9/8/2016	Update or Other Action	Email correspondence with RP indicates that the stockpile is actively being worked. Samples are slated for summer 2017.	Joshua Barsis
5/15/2017	Document, Report, or Work plan Review - other	Reviewed the Landspread Soil Evaluation Work Plan, dated May 9, 2017 for the C&L Tesoro site, located at 1610 Kanakanak Road in Dillingham, Alaska. Proposed activities generally consist of collecting analytical soil samples from the base and sidewalls of the land farm soils.	Joshua Barsis
10/9/2017	Update or Other Action	Landfarm sampling event postponed until September 2018, as the landfarm soils are most likely still contaminated at levels above the applicable ADEC cleanup levels. This assumption is based on odor and the number of tilling events that have occurred.	Joshua Barsis
9/19/2018	Update or Other Action	Reviewed a letter, dated August 27, 2018, that requested an extension for implementing the approved	Joshua Barsis

work plan until 2019. ADEC approved the extension in a letter dated September 19, 2018.

12/1/2021	Workplan Requested	Overdue work plan request sent to the Responsible Party. No action has been taken since 9/10/2018 when ADEC reviewed a letter, dated August 27, 2018, that requested an extension for implementing the approved work plan until 2019. ADEC approved the extension in a letter dated September 19, 2018.	Jessica Hall
12/8/2021	Update or Other Action	Verified address, email, and phone number with current listed responsible party (RP), via email dated 12/8/2021. RP will submit an updated work plan.	Jessica Hall

Contaminant Information

NAME	LEVEL DESCRIPTION	MEDIA	COMMENTS
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Control Type

TYPE	DETAILS
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Requirements

DESCRIPTION	DETAILS
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State of Alaska Department of Environmental Conservation

P.O. Box 111800
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Phone: 907-465-5066
Fax: 907-465-5245
TDD: 800-770-8973

Physical Location: 410 Willoughby