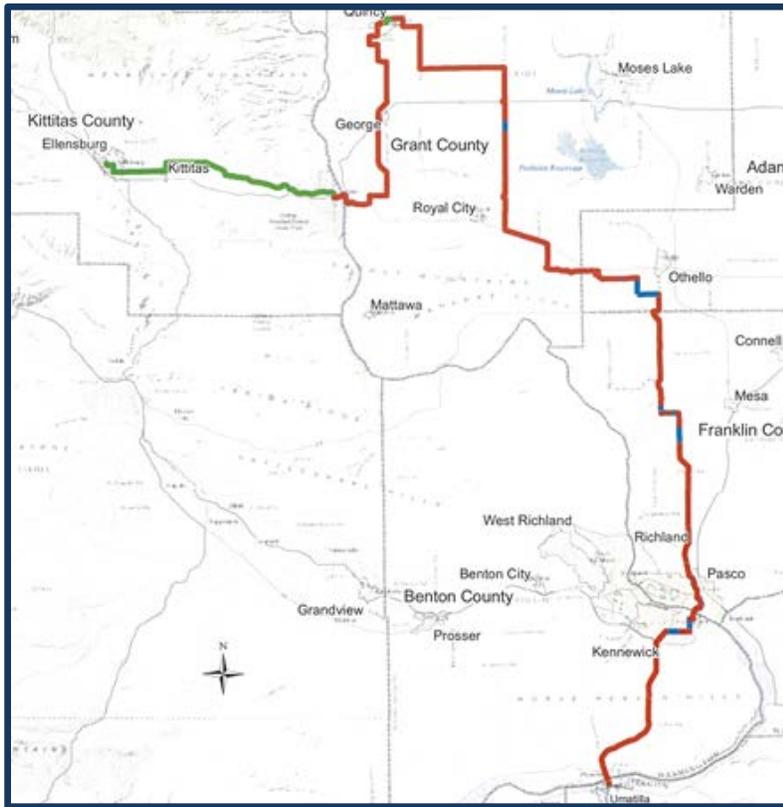


# RECLAMATION

*Managing Water in the West*

## **Consent to Use Permit – Fiber Optic Project Environmental Assessment & Finding of No Significant Impact**

*Columbia Basin Project, Eastern Washington and Oregon*



Bureau of Reclamation  
Pacific Northwest Region  
Columbia Cascades Area Office  
Yakima, Washington

February 2016

# **Finding of No Significant Impact Consent to Use Permit Fiber Optic Project**

**U. S. Department of Interior  
Bureau of Reclamation  
PN-FONSI 16-02  
February 2016**

## **Introduction**

The Bureau of Reclamation prepared this Finding of No Significant Impact (FONSI) to comply with the Council on Environmental Quality regulations for implementing the procedural provision of the National Environmental Policy Act (NEPA). The FONSI briefly describes the proposed action, the alternatives considered, and the scoping process. The FONSI explains the consultation and coordination activities and the findings made by Reclamation.

## **Background**

The development of the environmental assessment (EA) is to grant a Consent to Use Agreement to the Zayo Group to provide broadband and enhanced high-speed internet service in the Columbia Basin by installing a fiber optic cable from Ellensburg, Washington to Umatilla Oregon via Quincy, Washington. The cable route will follow existing road corridors and the installation will occur mainly within the associated road prism. A large portion of the cable in Kittitas County will be pulled through existing underground conduit. Where possible, cable crossing water channels will be installed either overhead or suspended upon existing bridge structures.

Upon completion of this project, associated communities able to connect to this system will have greater options for internet speed and service.

## **Purpose and Need**

The purpose of the project is for Bureau of Reclamation to issue a Consent to Use Permit to the Zayo Group. Consent to Use is required to install, operate, and maintain the portion of the fiber optic line that crosses Federal land. The large number of irrigation canals that crisscross this region fall under the jurisdiction of Reclamation

The Zayo Group, a company that provides bandwidth infrastructure services, proposes to install approximately 200 miles of fiber optic cable from Ellensburg in eastern Washington and extending to Umatilla, Oregon.

## **Proposed Action and Alternatives**

One action alternative was considered and evaluated in the EA. The No Action Alternative was evaluated as required by NEPA. The following are descriptions of the alternatives that were considered:

1. Alternative 1 - No Action. Reclamation would not issue Consent to Use Permit to the Zayo Group to construct, maintain, and operate a fiber optic line that crosses Reclamation canals or lands.
2. Alternative 2 – Consent to Use Permit Alternative. Reclamation would issue a Consent to Use Permit with the Zayo Group to construct, maintain, and operate a fiber optic line that crosses Reclamation canals or lands. The Zayo Group would install approximately 200 miles of fiber optic line from Ellensburg in Eastern Washington extending to Umatilla, Oregon.

## **Affected Environmental and Environmental Consequences**

### ***Fish & Wildlife***

Alternative 2 will have minimal effects upon fish and wildlife. All waterways will be crossed using an overhead system. As stated in the EA, the majority of the fiber optic cable will be buried within road rights-of-way or road prisms. Much of the traffic activity and noise will deter wildlife from the area. The entire corridor has been surveyed and scarce resident wildlife was observed. Washington Department of Fish & Wildlife (WDFW) provided a list of wildlife species identified within the area; however, because the construction area is directly adjacent to roadways and irrigation facilities, the probability of wildlife encounters or disturbance is minimal. If wildlife is in the adjacent area, disturbance effects are expected to be of short duration such that no significant impacts on these resources would occur.

### ***Endangered Species Act Listed Species***

Alternative 2 will have no effect on federally ESA-listed species [Northern wormwood (*Artemisia borealis* var. *wormskioldii*); Spalding's catchfly (*Silene spaldingii*); Umtanum desert buckwheat (*Eriogonum codium*); Ute ladies'-tresses (*Spiranthes diluvialis*); Wenatchee Mountains Checkermallow (*Sidalcea oregano* var. *calva*); White Bluffs bladderpod (*Physaria tuplashensis*); and Whitebark Pine (*Pinus albicaulis*)]. Surveys were conducted for the entire route during the summer of 2015, which identified no listed-species within the fiber optic route.

### ***Vegetation and Soils***

There will be minor effects to vegetation and soils along the project route. These effects are expected to be minor and of short duration. Any native vegetation disturbance will be reseeded with native grasses. In the unlikely event of a fluid leak or spill, contaminated soils will be removed, disposed of in accordance to State and Federal BMP Standards, and replaced with clean top soil, and native seed will be applied to these areas.

### ***Water Quality and Quantity***

Alternative 2 will have no effect on Federal or State waters along the project route. Waters and wetlands will be avoided by installing fiber optic cable on utility poles, in conduit, and/or the use of directional displacement boring as prescribed and determined by State and Federal agencies.

### ***Hazardous and Toxic Material***

There is a known site adjacent to the project area, however, this site has been contained. A certified environmental consultant will be on site to assess any potential hazard if the contractor notices unusual odors or stains in the area. The contractor is required to have on-site hazardous containment and clean-up kits during construction activity at all times.

### ***Socioeconomic***

Alternative 2 will include construction of state-of-the-art bandwidth infrastructure, which will provide improved services in quality, speed transfer rates, and reliability to residents, businesses, and private and public organizations within eastern Washington and the region as a whole. It is anticipated that the project will temporarily increase economic growth in the region due to employment and services related to construction and operations of the proposed improvements. Cumulative effects anticipated include increased employment and economic growth in the region.

### ***Environmental Justice***

Alternative 2 would not have a disproportionate effect on minority or low income populations as the project is within the prism of existing road corridors and canals.

### ***Cultural Resources and Indian Sacred Sites***

Reclamation has determined that the 73 identified cultural resources that were determined eligible, potentially eligible, or contributing will not be adversely affected by the proposed action.

The project corridor lies within the traditional territories of the Confederated Tribes of the Colville Reservation (CCT). The project corridor is also located within the ceded lands of both the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) as well as the Confederated Tribes of the Umatilla Indian Reservation (CTUIR). The project corridor also lies within the traditional lands of the Wanapum Tribe and within the areas of interest for the Spokane Tribe and Nez Perce Tribe.

As part of Section 106 of the National Historic Preservation Act, Reclamation received concurrence from the Washington State Department of Archaeology and Historic Preservation of a no adverse effect determination on historic properties on February 18, 2016. Reclamation also received concurrence from the affected Tribes. If cultural or archaeological resources are inadvertently discovered during ground-disturbing activities, an inadvertent discovery plan in place.

There are no sacred sites or traditional cultural properties known to exist within the project area. Tribal monitors will be present during construction activities to identify any such sites or properties and will consult with Reclamation regarding possible adverse effects.

The Corps and the USFWS are identified as participating agencies with Reclamation as the lead Federal agency. Reclamation is acting on behalf of the other Federal agencies, fulfilling their collective responsibilities under Section 106.

### ***Indian Trust Assets***

There will be no impacts on Indian Trust Assets since none have been identified within the project corridor.

### **Environmental Commitments**

The EA identifies Best Management Practices which, when implemented, will minimize environmental impacts during the implementation of Alternative 2.

### **Consultation and Coordination**

State and Federal stakeholders were identified during a scoping process that was conducted by the Zayo Group. The U.S. Fish and Wildlife Service (USFWS) and U.S. Army Corps of Engineers (Corps) responded with concerns and questions related to wildlife and realty. Reclamation consulted with both agencies to minimize project effects in coordination with the Zayo Group.

### **Findings and Decision**

Alternative 2 was selected as the preferred alternative, which will provide bandwidth infrastructure services to several residents, businesses, private and public entities while having minimum environmental impacts.

Reclamation will authorize, through the Consent to Use Permit, the use of Federal land for the installation, operation, and maintenance of the portion of the fiber optic line that crosses Reclamation property

Based on analysis of the environmental impacts and consultation and coordination as presented in this final EA and FONSI, Reclamation concludes that implementation of the recommended action will not have a significant effect on the quality of the human environment or natural and historic resources. No significant impacts to resources are identified in the final EA. Therefore, Reclamation concludes that preparation of an Environmental Impact Statement is not required and that this FONSI satisfies the requirements of NEPA.

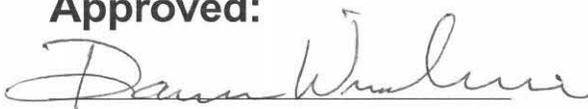
### **Recommended:**



Candace McKinley  
Environmental Program Manager  
Bureau of Reclamation  
Columbia-Cascade Area Office

2/24/16  
Date

### **Approved:**



Dawn Wiedmeier  
Area Manager  
Bureau of Reclamation  
Columbia-Cascade Area Office

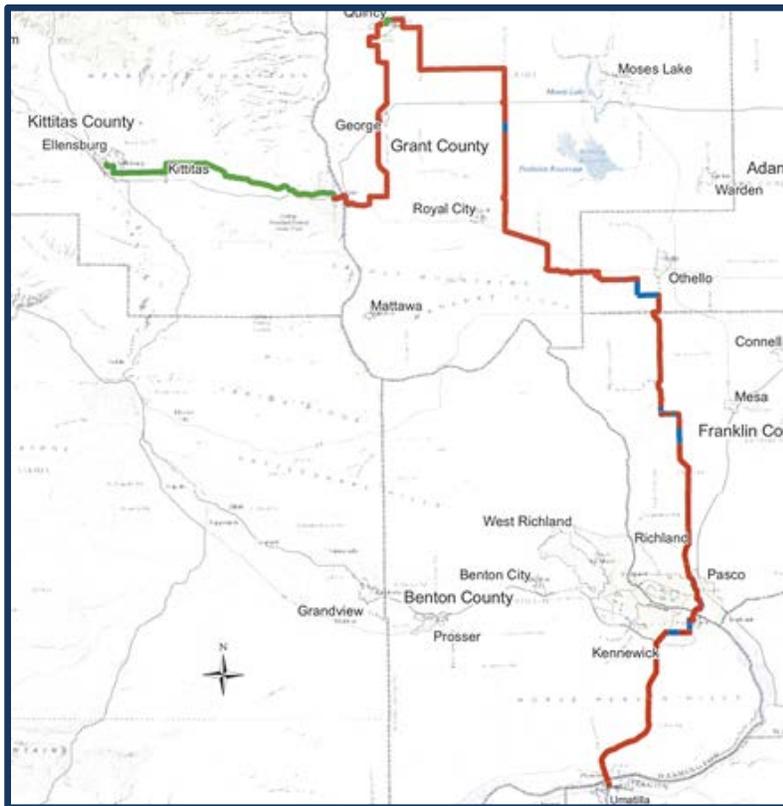
2/26/16  
Date

# RECLAMATION

*Managing Water in the West*

## Consent to Use Permit – Fiber Optic Project Final Environmental Assessment

*Columbia Basin Project, Eastern Washington and Oregon*



Bureau of Reclamation  
Pacific Northwest Region  
Columbia Cascades Area Office  
Yakima, Washington

February 2016

## **Mission Statements**

The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to Indian Tribes and our commitments to island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

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## List of Acronyms

CCT	Confederated Tribes of the Colville Reservation
CGP	Construction General Permit
Corps	U.S. Army Corps of Engineers
EA	Environmental Assessment
EPA	U.S. Environmental Protection Agency
FSID	Facility/Site Identification System
GIS	Geographic Information System
HPA	Hydraulic Project Approvals
HWY	Highway
ITA	Indian Trust Assets
NASM	Nonindigenous Aquatic Species Mapper
NE	Northeast
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NW	Northwest
NWR	National Wildlife Refuge
ODEQ	Oregon Department of Environmental Quality
ORIA	Office for Regulatory Innovation and Assistance
PHS	Priority Habitats and Species
Reclamation	U.S. Bureau of Reclamation
ROW	Right of Way
SE	Southeast
SEPA	State Environmental Policy Act
SHPO	State Historic Preservation Officer
Static	Static Consulting Services Inc.
SW	Southwest
SWPPP	Storm Water Pollution Prevention Plan
TCP	Traditional Cultural Property
TMDL	Total Maximum Daily Load
U.S.	United States
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WDFW	Washington Department of Fish and Wildlife
WDNR	Washington Department of Natural Resources
WDOE	Washington Department of Ecology
WSDOT	Washington State Department of Transportation

# **1. Purpose and Need**

The purpose of the project is for Bureau of Reclamation to issue a Consent to Use Permit to the Zayn Group. A Consent to Use Permit is required for the Zayn Group to install, operate, and maintain the proposed fiber optic line that would be routed through portions of Federal land. The large number of irrigation canals that crisscross this region fall under the jurisdiction of Reclamation

The Zayn Group, a company that provides bandwidth infrastructure services, proposes to install approximately 200 miles of fiber optic cable that would extend from Ellensburg in eastern Washington to Umatilla, Oregon.

# **2. Proposed Action**

The proposed action is for Reclamation to issue a Consent to Use Permit to Zayn Group to cross Federal land for the purpose of installing a fiber optic line. Approximately 200 miles of fiber optic line would be installed in two segments. The project area is described below and shown in Figure 1.

## **2.1 Segment 1: Ellensburg to Quincy**

The first segment provides a fiber optic connection between the City of Ellensburg and Quincy in Kittitas and Grant counties. The route runs west from Ellensburg along Kittitas Highway and Vantage Highway to Vantage, crossing the Washington State Department of Transportation (WSDOT) I-90 Bridge, then follows Highway 26 to Road S, Road R, northerly on Road Q, and on to Highway 281 into Quincy. The route begins in the City of Ellensburg on West Dolarway Road and ends in Quincy at the intersection of Road R Northwest (NW) and D Street NW.

## **2.2 Segment 2: Quincy to Umatilla.**

The second segment provides a fiber optic connection between Quincy and Umatilla, crossing Grant, Adams, Franklin, and Benton counties in Washington, and Umatilla County in Oregon. The segment begins at the terminus of Segment 1 in Quincy at the intersection of Road R NW and D Street NW, runs along Road D NW, M Street Northeast (NE), and Road O NW within the city limits of Quincy. The route continues along Grant County roads southerly and easterly to Highway 26 into Adams County. From here, the route heads south on Highway 24 to Franklin County and continues south along Franklin County roads (Sage Hill, Klamath, and North Glade) into the City of Pasco. Through Pasco, the route crosses the WSDOT Highway 397 Bridge, through the City of Kennewick to Highway 395. The route continues south and westerly along Highway 395, Bofer Canyon Road, parallel to Interstate 82, crossing the I-82 Bridge into Umatilla. The route terminates in Umatilla at 3<sup>rd</sup> Street and Munger Lane.

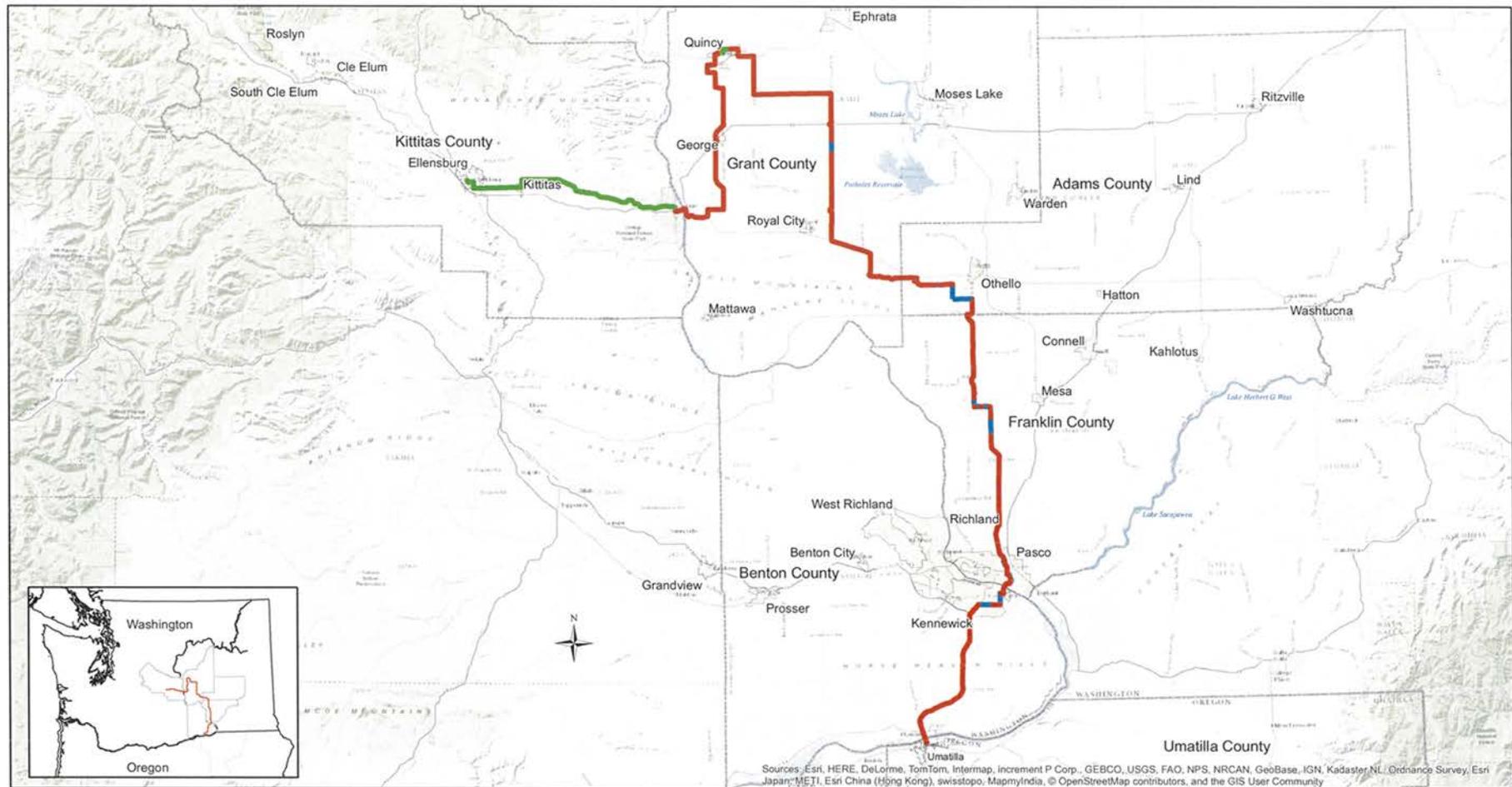
Both segments of the project will remain within Federal, State, county, or city road rights-of-way (ROW). The proposed route would cross Reclamation ditches or canals at 215 crossing points, affecting 1,670 square feet of Reclamation land. All crossings would avoid direct impact on Reclamation ditches or canals, as Zayo would install the fiber optic line on existing utility poles where possible, in conduits along bridges, or within the road prism if the irrigation ditch or canal crosses under the road in a culvert.

Segment 1 would be constructed within the existing conduit from Ellensburg to Vantage (this 32-mile section of existing conduit was permitted by Fairpoint/Ellensburg Telephone) then through direct-buried methods for the remaining segment to Quincy, except at bridge crossings where the line would be placed above the water surface along the bridge structure.

Segment 2 would be constructed using a mix of aerial installation, buried methods, existing conduit, and bridge attachments. Aerial installation, bridge attachments, and use of existing conduit are the preferred methods wherever possible in areas with existing infrastructure, as they require no ground disturbance. Aerial installation consists of connecting fiber optic conduit between existing utility poles. Bridge attachments involve connecting the conduit to the existing bridge structure. Use of existing conduit involves running the fiber optic line through existing buried conduit using existing vault locations for access. Buried portions of the line would be constructed by direct trenching methods or directional boring. When buried, using either method, the line would be installed between 36 and 42 inches below the ground surface, depending upon the specific ROW-owner requirements at that location. Portions of the route that cross streams, drainages, and jurisdictional wetlands will be bored under to avoid impacts, with required buffers included in the bore distance. In cases where water crossings are located within culverts or channels that are well below the top of the road surface, the conduit may be buried above the elevation of the water crossings within the roadbed.

## **2.3 Detailed Construction Methods**

Direct trenching methods consists of installing the cable conduit using a specialized plow with a blade and a conduit-spooler on one end. The equipment cleaves a narrow furrow through the soil to the prescribed depth and the line immediately feeds into the furrow behind the plow. Because the furrow is narrow, the soil, sod, and surface materials fall back over the furrow leaving essentially no exposed soil. Where large rocks are encountered, a backhoe would be used to excavate a narrow trench that would be backfilled immediately after the line is installed. The average installation rate is typically 2,500 feet per day. The area of soil and dirt exposed using this process is minimal.



Additional Sources:  
<http://metadata.gis.washington.edu/geoportal/catalog/search/browse/browse.page>  
 United States Bureau of Reclamation  
 Benton County GIS - <http://www.co.benton.wa.us/gis/view.aspx?hd=490&catD=45>  
 Kittitas County GIS - <http://data.kitco.org/arcgis/rest/services/GrantCountyGIS>  
 Grant County GIS - <http://www.grantcountywa.gov/GIS/>  
 Franklin County GIS - <http://gis.co.franklin.wa.us/>

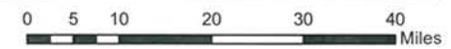
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 Standard Parallel 2: 47.3333  
 Latitude Of Origin: 45.3333  
 Units: Foot US



**Zayo  
 Eastern Washington/Oregon  
 Fiber Optic Project**

- Lakes
- City Boundaries
- County Boundaries

- Fiber Optic Placement**
- Underground or Bridge Attachment
  - Existing Conduit
  - Aerial



**Figure 1.** Location and Route of Proposed Fiber Optic Cable. Green line shows existing conduit. Red line shows underground or bridge attachment. Blue line show aerial placement.



For both buried construction methods, a fiberglass, utility handhole/access point will be excavated (a hole approximately 2 feet by 3 feet by 3 feet, covering a 36-square-foot area) approximately every 2,000 feet using an excavator to allow for storage and splicing sections of fiber optic cable. For aerial installation a utility handhole/access point would be excavated next to a utility pole approximately every 20,000 feet to allow splicing of sections of fiber optic cable. Utility handhole/access points would be excavated outside of all streams, drainages, and jurisdictional wetlands, including the required buffers associated with these features. All excavated material would be replaced, and disturbed surfaces would be reseeded after line installation.

In areas without enough space to excavate in the open ROW (e.g., areas where the road embankment fills the whole ROW or where wetlands fill most of the ROW precluding directional boring), the conduit would be installed within the road prism per ROW standards using a side-arm attachment on the installation equipment to make sure that all disturbance is within the ROW and outside of protected areas.

No fill is planned for this project unless subsurface rocks are encountered that must be removed. If fill is necessary, native soil/spoils from excavation in the general vicinity, or controlled density fill (CDF) if mandated by the ROW owner, would be used. Any CDF would be obtained from a local, permitted material site.

Staging areas would not be flattened, graded, or stripped of topsoil. Equipment will run over the existing vegetation and ground surface. After the splicing is complete, all excavated material would be replaced and the disturbed area revegetated with native seed mix certified as "Prohibited and Restricted Noxious Weed Free for the State of Washington." Disturbed areas would be seeded with a seed mix that complies with Federal, State, and local ROW permit requirements, including Washington State Department of Transportation (WSDOT) hydro-seeding requirements specified by region.

Any grading required along the project route would match the existing road grade, after fiberglass utility handhole/access point excavation. The project would take approximately 300 days to complete once all permits are approved. Construction would begin throughout segments 1 and 2, with the intent to build the largest sections of contiguous footage that are permit-ready.

### **3. Alternatives**

The National Environmental Policy Act (NEPA) requires review of a reasonable range of alternatives. This chapter describes the following Alternative 1 - No Action and Alternative 2 – Consent to Use Permit.

#### ***Alternative 1 - No Action***

Reclamation would not issue land use agreements with the Zayo Group to construct, maintain, and operate a fiber optic line that crosses Reclamation and Corps canals or lands.

#### ***Alternative 2 - Consent to Use Permit***

Reclamation would issue a Consent to use Permit to the Zayo Group to construct, maintain, and operate a fiber optic line that would cross Reclamation canals or lands. The Zayo Group would install approximately 200 miles of fiber optic line extending from Ellensburg in eastern Washington to Umatilla, Oregon.

### **3.1 Alternative 1 – No Action**

Under the Alternative 1, Reclamation would not issue a Consent to Use Permit to the Zayo Group, and the fiber optic cable project would not be constructed. Residents, businesses, private organizations, and public institutions in the region would remain underserved or unserved in with broadband connectivity. Current customers of broadband services would continue to use slow connections, which may be sufficient for some individuals, but is inadequate for large businesses, public agencies, and private institutions. Operations of datacenters by multinational internet companies would remain hampered in their ability to process computer data because the existing fiber optic network in the region has reached capacity. Potential economic growth would be limited, resulting in negative impacts on the economy of the region. In addition, employment opportunities related to the construction and operation of the project would not be realized. If Alternative 1 is selected, it would result in having a negative economic impact on the region.

Alternative 1 would not have an impact on protected resources. No permits or clearances would be needed under Alternative 1.

### 3.2 Alternative 2 – Consent to Use Permit

Reclamation proposes to approve a Consent to Use Permit to the Zayo Group to construct, maintain, and operate a fiber optic line that would cross Reclamation canals and lands. The Zayo Group would construct the 200 miles of fiber optic cable extending from Ellensburg, Washington to Umatilla, Oregon. Existing conduit and utility poles along the route would be used as much as possible to minimize ground disturbance. Bandwidth connectivity over a state-of-the-art network infrastructure would be available to underserved or unserved residents, businesses, private organizations, and public institutions in the region, providing increased access, transfer rates, and reliability to broadband customers.

The permits or clearances listed in Table 1 would be obtained prior to construction to comply with all applicable Federal and State regulations.

**Table 1 – List of Permits and/or Clearances**

Permit/Process	Agency
<b>Federal</b>	
Consent to Use Authorization	Reclamation
Land Easement	U.S. Army Corps of Engineers (Corps)
Department of the Army Permit Section 10 (received)	Corps
Section 106 of the National Historic Preservation Act	Reclamation
<b>State</b>	
Hydraulics Project Approval (received)	Washington Department of Fish and Wildlife (WDFW)
Aquatic Use Authorization (received)	Washington Department of Natural Resources (WDNR)
State Environmental Policy Act (SEPA) Determination of Non Significance (received)	Washington State Department of Ecology (Ecology)
Construction Storm Water General Permit (received)	Ecology
<b>Local</b>	
None	

# 1. Affected Environment and Environmental Consequences

## 1.1 Biological Resources

### Affected Environment

#### Fish and Wildlife

Sixty-four wildlife species that have been observed or are known to occur in or near the project area. These species were identified by the following means:

- A trusted resources species list was downloaded from the U.S. Fish and Wildlife Service (USFWS) Environmental Conservation Online System on February 10, 2015, at [www.ecos.fws.gov/ipac](http://www.ecos.fws.gov/ipac).
- Ms. Jennifer Nelson of the Washington State Department of Fish and Wildlife (WDFW) was consulted for a priority habitats and species (PHS) list, and observations were made on an investigative survey conducted in late February 2015.
- The PHS list was cross-referenced with WDFW's PHS Geographic Information System data.

The compiled list includes 36 bird species, 10 fish species, 1 amphibian, 13 mammals, and 4 reptiles. Of the 64 species known to occur in or near the proposed project area, 11 are federally listed as threatened, endangered, or candidate species. There are 24 State-listed threatened, endangered, or candidate species (many overlap with the federally listed species).

#### Endangered Species Act Listed Species

A threatened and endangered plant-species list was obtained on February 10, 2015, from *USFWS Environmental Conservation Online System* at [www.ecos.fws.gov/ipac](http://www.ecos.fws.gov/ipac). In addition, WDNR Rare Plant Biologist, Mr. Joe Arnett, was consulted on March 16, 2015, for plants that are legally protected in the project area. Protected species identified from these sources were combined, and plant habitat and occurrence maps were evaluated. The following seven protected, threatened, and endangered plant species occur in the region:

- Northern wormwood (*Artemisia borealis* var. *wormskioldii*)
- Spalding's catchfly (*Silene spaldingii*)
- Umtanum desert buckwheat (*Eriogonum codium*)
- Ute ladies'-tresses (*Spiranthes diluvialis*)
- Wenatchee Mountains Checkermallow (*Sidalcea oregano* var. *calva*)
- White Bluffs bladderpod (*Physaria tuplashensis*)
- Whitebark Pine (*Pinus albicaulis*)

## Environmental Consequences

### ***Alternative 1 – No Action***

The No Action Alternative would have no impacts on biological resources.

### ***Alternative 2 – Consent to Use Permit***

#### **Fish and Wildlife**

For each of the 64 wildlife species that may be potentially impacted by the proposed project, specific and individual mitigation measures were developed to minimize temporary and construction impacts to avoid permanent impacts on the species. Some highlights are as follows:

- Townsend Ground Squirrel (*Urocitellus townsendii*) and Burrowing Owl (*Athene cunicularia*): A targeted preconstruction survey was conducted in April 2015 to identify specific avoidance and minimization measures for these two State-listed species. Mr. Greg Matuzak, Stantec biologist, accompanied by Mr. Michael Ritter, WDFW biologist, identified potential owl burrows and a single ground-squirrel colony adjacent to the ROW in Benton County. Project activities would have no impact on any burrows or the ground squirrel colony, as they are located more than 20 feet from the proposed construction area.
- Bird Species: No trees would be removed. If construction occurs within a particular area of the ROW during the nesting season (March through August), preconstruction surveys would be conducted for those areas that may contain suitable nesting habitat for bird species. If active nests are found within the project corridor, coordination with the USFWS would be undertaken to establish a no-construction buffer around the nest until chicks have fledged. If construction occurs between August and February, preconstruction surveys would not be necessary.

Once construction begins, it is anticipated that wildlife species not identified in the preconstruction survey (or are not nesting or burrowing) may temporarily avoid the vicinity of active construction sites due to increased noise and human activity.

Propagation of noxious weeds facilitated through ground disturbance would be minimized by following BMP, which include:

- Equipment and vehicles would be cleaned of soil and potential noxious weed seeds and plant parts prior to commencing construction and at the end of each day.
- Disturbed areas will be revegetated with seed mix certified as “Prohibited and Restricted Noxious Weed Free for the State of Washington.”
- All pits will be weed free and fill material will be Washington certified weed free.

## Endangered Species Act Listed Species

The following mitigation measures to avoid permanent impacts on these species would be implemented:

- Conduct targeted preconstruction surveys where the species' habitat and the route coincide.
- If a protected plant species is found, a no-construction buffer would be designated in consultation with the USFWS. Plants will be avoided by shifting the location of boreholes and trenching route, as needed, or trenching on the edge of the road pavement. If necessary, plants may also be avoided by boring under them.

With these measures, no permanent impacts on these plant species are anticipated

## 4.2 Hazardous and Toxic Materials

### Affected Environment

Based on a review of the ODEQ's Environmental Cleanup Site Information Database, WDOE's facility and site GIS data, Toxic Cleanup Program Hazardous Site List (February 19, 2015), and consultation with WDOE, there are 25 hazardous sites within 1 mile of the project route. All 25 sites were evaluated for their potential to affect human health or the environment in relation to the project. One site was determined to be of concern and is shown in the table below. Table 2 provides the site name, address, Facility/Site Identification System (FSID) number, and type of contamination.

**Table 2 – Hazardous Material Site that May Affect Alternative 2**

Name	Address	FSID	Contaminant
Puregro Quincy	99 N Beverly Burke Road, Quincy, WA	596	Pesticides

The Puregro Quincy site, adjacent to the project route, has unspecified pesticides in the soil. WDOE has ranked the site as a "5" using the Washington Ranking Method, which represents the lowest risk to human health and the environment. Although the potential is low, the site warrants caution and may be a source of surficial soil contamination. WDOE recommends employing a certified environmental consultant to assess a potential recognizable condition if the contractor notices any unusual odors or stains in the area. The contractor would be required to have on-site a hazardous material containment and cleanup kit during construction activity in all areas.

## **Environmental Consequences**

### ***Alternative 1 - No Action Alternative***

Alternative 1 would not generate hazardous or solid wastes, nor would it contribute to contamination.

### ***Alternative 2 – Consent to Use Permit***

Alternative 2, Consent to Use Permit would not generate additional hazardous wastes or contaminated water.

If contaminated soil is encountered, it would be handled and disposed of in accordance with a WDOE-approved action plan; therefore, adverse cumulative impacts would decrease. If the certified environmental consultant determines that the suspected contamination at the Puregro Quincy could have an impact on human health and the environment or is of public concern, the consultant will contact WDOE. WDOE's recommendations would be followed to avoid impacts on human health and the environment. The certified environmental consultant would be on call during excavation activities.

## **4.3 Cultural Resources**

The study area for cultural resources is approximately 322 kilometers (200 miles) of fiber optic cable from Ellensburg, Washington to Umatilla, Oregon for the installation and maintenance of the fiber optic line that crosses 224 irrigation facilities owned and maintained by Reclamation.

### **Affected Environment**

In considering the potential for impacts on cultural resources associated with the proposed fiber optic line, the area of potential effect (APE) includes both the areas of direct impact and indirect impact (i.e., visual, auditory effects). The area of direct impact encompasses the length of the corridor, approximately 322 kilometers (200 miles) and the width of the road ROW where excavation would occur for the buried portions of the fiber optic line. The area of indirect impact includes the view-shed for those areas where aerial installation will be employed: the spectrum of visible areas from all locations around a project area. For those portions of the proposed fiber optic line that are below the surface, there would be no visual effect to any surrounding historic resources. However, for those areas where aerial installation is employed, the APE for indirect effects is the adjacent parcels to the road ROW.

### **Regulatory Context**

The National Historic Preservation Act (NHPA) requires Federal agencies to complete inventories to identify historic resources that may be eligible for listing on the National Register of Historic Places (NRHP). The NHPA also directs project proponents with undertakings on

Federal lands to consider the potential effects their undertaking may have on significant historic resources.

Section 106 of the NHPA defines the process for identifying and evaluating project developments and their potential effects on cultural resources. This process calls for the identification of significant (eligible) historic properties within the area potentially affected by the Alternative 2. It also calls for consultation with the State Historic Preservation Officer (SHPO) potentially affected Indian Tribes, the Advisory Council on Historic Preservation, and other interested parties (36 CFR part 800).

### **Identification of Participants in the Section 106 Process**

The Corps and the USFWS are identified as participating Federal agencies, and Reclamation serves as the lead Federal agency. Reclamation is acting on behalf of the other Federal agencies, fulfilling their collective responsibilities under Section 106 (36 CFR 800.2 [a] [2]).

The project corridor lies within the traditional territories of the Confederated Tribes of the Colville Reservation (CCT). The project corridor is also located within the ceded lands of both the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) as well as the Confederated Tribes of the Umatilla Indian Reservation (CTUIR). The project corridor also lies within the traditional lands of the Wanapum Tribe and within the areas of interest for the Spokane Tribe and Nez Perce Tribe.

The following Tribes expressed interest in participating in the Section 106 process; CCT, Yakama Nation, and CTUIR. The Spokane Tribe deferred to the Yakama Nation and CTUIR for this project consultation. Reclamation initiated consultation with all of the Tribes to discuss ways to minimize or resolve any adverse effects, if determined by the Tribe, as well as to address any questions or concerns during the Section 106 process.

The Corps and the USFWS were identified as participating Federal agencies with Reclamation as lead Federal agency. Reclamation is acting on behalf of the other Federal agencies, fulfilling their collective responsibilities under Section 106 (36 CFR 800.2 [a] [2]).

### **General Background**

The project corridor is included within the Plateau culture area, according to the *Smithsonian Handbook of North American Indians* (Walker 1998). The Plateau cultural area is geographically bordered on the west by the Cascade Range, on the east by the Rocky Mountains, on the north by the lower extension of the Rocky Mountains in Canada, and south by the Blue Mountains and Salmon River. The culture areas that surround the Plateau are the Northwest Coast to the west, the Plains to the east, the Sub-arctic culture area to the north, and the southern border gradually merging with the Great Basin culture area. The Plateau culture area includes the Interior Salishan peoples, the Sahaptian peoples, the Athapaskan outliers, the Kootenai and Cayuse, and several cultural isolates (Walker 1998:1).

Since the project corridor is quite extensive (200 miles) a discussion of the prehistory and history of the APE would be both too broad and extensive for this document. A detailed discussion of

the regional prehistoric and historic background, as well as the previous archaeological research conducted within and adjacent to the project corridor is provided in the cultural resource survey report for this project (Fortin 2015)

### **Cultural Resource Assessment Survey and Report**

A cultural resources assessment survey was conducted in the summer of 2015. A resultant report edited by Plateau Archaeological Investigations, LLC, titled *Zayo Fiber Optics Project, Eastern Washington and Oregon Cultural Resource Survey* was completed in December 2015 (Fortin 2015). Within the APE, 308 cultural resources were identified: eight archaeological resources and more than 300 built environment resources. Seven new archaeological resources were recorded during the survey: three pre-contact archaeological sites (45GR3466, 45GR3467, and 45GR3468), one historic debris scatter (45GR3465), and three pre-contact isolates (45GR3469, 45GR3470, and 45GR3471). One previously recorded archaeological site, the Umatilla Bridge Site (35UM58), was also identified within the APE. Of the 300 built environment resources, 224 were irrigation canals and 76 buildings or structures were surveyed. Forty of the built environment resources were not visible (n=38) or either demolished (n=2); therefore, they were not inventoried (i.e., historic property inventory [HPI] forms) were not completed. As part of the cultural resources investigations, both Reclamation and the project proponent consulted with the interested Tribes' THPO and tribal archaeologists to determine whether the project would affect any known traditional cultural properties (TCPs).

### **Resource Eligibility and Project Effect**

#### ***Archaeological Resources***

Of the eight identified archaeological resources, one site (35UM58) has already been determined eligible for listing on the NRHP. Reclamation has determined that site 45GR3466 is potentially eligible for listing on the NRHP. Sites 45GR3465, 45GR3467, and 45GR3468 have been determined *not* eligible for listing on the NRHP. Sites 45GR3469, 45GR3470, and 45GR3471 are isolates and, by definition, determined not eligible for listing on NRHP.

Two previously recorded archaeological sites in Washington (45BN202, 45BN1443) are not within the project corridor but lie within close proximity, warranting additional consideration in this consultation. Site 45BN202 is considered NRHP-eligible and 45BN1443 has not been evaluated; both are located near the shoreline of the Columbia River at the Umatilla Bridge Crossing. The survey report outlines an archaeological monitoring plan for several areas, including both sides of the Columbia River Crossing where site 35UM58 is located on the Oregon side of the river and sites 45BN202 and 45BN1443 are located. Reclamation endorses the consultant's recommendations for all areas outlined in the report to be archaeologically monitored. The archaeological monitoring plan will ensure that site 35UM58 (as well as 45BN202 and 45BN1443) will not be adversely impacted. Reclamation also requires visual barriers and boundaries erected around the two archaeological sites as well as archaeological monitoring of construction and installation of the proposed fiber optic cable.

### ***Built Environment Resources***

Of the 260 built-environment resources that were inventoried, the following determinations of eligibility were made: 28 resources were determined to be individually eligible, 43 resources were determined not to be individually eligible but eligible as contributing to a potential Pasco Naval Air Station Historic District or the Columbia Basin Project irrigation system, and 188 resources were determined not to be individually eligible or not eligible as contributing to the Columbia Basin Project irrigation system.

### **Traditional Cultural Properties and Sacred sites**

The project proponent has coordinated separately from the Section 106 process with all interested Tribes (i.e., CTUIR, Yakama Nation, and CCT) with regard to providing on-site Tribal monitors where and when the Tribes deem appropriate during construction activities and throughout the course of installation of the fiber optic line.

The proposed installation methods for the fiber optic line, along with planned monitoring by archaeologists, tribal monitors, and district engineers during construction, will ensure that none of the eligible irrigation canals or TCPs or any of the eligible or potentially eligible archaeological resources will be adversely impacted. Consequently, Reclamation has determined that the 73 resources determined eligible, potentially eligible, or contributing will not be adversely affected by the proposed undertaking per 36CFR 800.5(d) (1).

### **Environmental Consequences**

#### ***Alternative 1 – No Action***

Alternative 1 will be no effect to cultural resources or sacred sites under the No Action alternative.

#### ***Alternative 2 – Consent to Use Permit***

Reclamation has determined that the 73 resources determined eligible, potentially eligible, or contributing will not be adversely affected by the Alternative 2. If cultural or archaeological resources are inadvertently discovered during ground disturbing activities, there is an inadvertent discovery plan included in the cultural resource survey report (Fortin 2012:255). There are no sacred sites or TCPs known to existing within the project area; however, there will be Tribal monitors present during construction activities to identify any such sites or properties and will subsequently consult with Reclamation regarding possible adverse effects.

## **4.4 Indian Trust Assets**

### **Affected Environment**

Indian Trust Assets (ITAs) are defined as legal interests in assets held in trust by the U.S. Government for Native American Indian Tribe or individual Tribal members. Examples of ITAs are lands, minerals, water rights, other natural resources, money, or claims. An ITA cannot be sold, leased, or otherwise alienated without approval of the Federal government. Reclamation consultation with potentially affected Tribes and the Bureau of Indian Affairs has yielded no known ITAs within the project area.

### **Environmental Consequences**

#### ***Alternative 1 – No Action***

There will be no effect on ITAs under the Alternative 1.

#### ***Alternative 2 – Consent to Use Permit***

Alternative 2 will have no impacts on ITAs, since no known ITAs have been identified within the project corridor.

## **4.5 Socioeconomic**

### **Affected Environment**

Many parts of rural eastern Washington are underserved or unserved in regard to reliable, high-speed, low-cost broadband services, which include internet access, cable television, and digital phone services. The existing fiber optic infrastructure is at capacity and does not meet the needs of multinational companies in the region that have built or plan to build data centers that serve millions of internet customers not only within eastern Washington, but within the all of Washington State and other states, including Oregon.

### **Environmental Consequences**

#### ***Alternative 1 - No Action***

Alternative 1 would inhibit the build-out of reliable, high-speed, low-cost broadband services in the region, which would have a potential negative impact on the socioeconomics in the region. In addition, the Alternative 1 would have a negative impact on employment related to the construction and operation of reliable, high-speed, low-cost broadband services.

### ***Alternative 2 – Consent to Use Permit***

The Alternative 2 would include construction of state-of-the-art bandwidth infrastructure, which would provide improved services in quality, speed transfer rates, and reliability to residents, businesses, private organizations, and public institutions within eastern Washington and the region as a whole. It is anticipated that the proposed project will spur economic growth in the region due to employment and services related to the build-out and operations of the proposed improvements to broadband services; however, specific economic benefits were not quantified as part of this analysis. Employment opportunities would temporarily increase during the construction of the fiber optic cable. Permanent jobs would be created through the operations of the new fiber optic cable and additional services related to the build-out of the network, which will tap demand for high-speed, low-cost broadband services in the region. Alternative 2 would not displace residences or businesses or result in alterations to vehicle traffic patterns. Cumulative effects anticipated include increased employment and economic growth in the region.

## **4.6 Soils Resource**

### **Affected Environment**

The project area is predominantly flat, except along Highway 26 in Kittitas County as it gently slopes toward then crosses the Columbia River, and climbs through the hills along a canyon on the Vantage Highway. The steepest slopes along the project route are found in a canyon in Kittitas County on the Vantage Highway. Along this stretch of the highway, portions of the road were cut through rock, and large amounts of fill were placed to build up the road embankment to cross ravines. Some rock faces are cut to 90 degree slopes. The steepest slope in fill areas is 70 degrees at approximately (GIS coordinates) N 46° 57' 17.30" and W 120° 05' 43.27". In these areas, the fiber optic cable would be installed within existing conduit.

The project route is located in one of the most arid parts of Washington State, wind erosion is both common and of concern.

### **Environmental Consequences**

#### ***Alternative 1 - No Action***

Alternative 1 would not have an impact on soil resources or cause erosion.

#### ***Alternative 2 – Consent to Use Permit***

##### **Erosion**

Erosion by wind or water related to the project is anticipated to be negligible or minor, as the BMP cited in the *Stormwater Management Manual for Eastern Washington* (Ecology, 2004) would be followed to prevent and minimize its occurrence. During trench installation, the cable furrow would be filled in immediately after the cable is put in place, which greatly minimizes the time that soil is exposed. Installation would move quickly, at a rate of approximately 2,500 feet

per day, and the amount of soil and dirt exposed for more than a few hours would be minimal. Areas that require excavation to remove large rocks would be backfilled as soon as installation work is completed. If fugitive dust becomes an issue during dry conditions, operations would either cease until the wind dies down or a water truck would be used to water down surface material.

Approximately every 2,000 feet in underground sections and 20,000 feet in aerial sections, a 2-foot by 3-foot by 3-foot fiberglass utility handhole/access point would be excavated to allow fiber optic cable splicing. The expected disturbed area of each excavation is 36 square feet. After the splicing is complete, all excavated material would be replaced, and the disturbed area would be seeded with native seed mix certified as “Prohibited and Restricted Noxious Weed Free for the State of Washington.” The only impervious surfaces that would be added to the project are the fiberglass utility handhole/access points, with a total surface area of approximately 0.33 acres over the entirety of the project route.

## 4.7 Water Quality

### Affected Environment

Many streams, irrigation ditches or canals, and wetlands are near or cross the project route. Many irrigation ditches and canals under the jurisdiction of Reclamation crisscross the region. Two waterbodies along the route are listed as impaired under Category 5. Category 5 waterbodies are polluted waters that require a total maximum daily load (TMDL) or a limitation on one or more pollutants that are allowed to enter the waterbody. Table 3 lists information about these two impaired water bodies.

**Table 3 – Impaired Water Bodies**

<b>Water Body Name</b>	<b>Listing ID</b>	<b>General Location</b>	<b>Pollutant</b>	<b>Category</b>
Naneum Creek	48438	Creek crosses Kittitas Highway in Kittitas, WA.	Temperature	5
Columbia River	11086, 11092, 11093, 11094, 11095, 16782	The Columbia River at the Umatilla Bridge (U.S. Highway 395) near Plymouth, WA and Umatilla, OR.	Temperature Mercury pH Ammonia-N Arsenic Bacteria	5

## **Environmental Consequences**

### ***Alternative 1 - No Action***

Alternative 1 would have no effect on water quality.

### ***Alternative 2 – Consent to Use Permit***

The Consent to Use Permit, Alternative 2, would not require any excavation or placement of fill in surface waters or wetlands, as this would have a direct impact on water quality. Wetlands and waters would be avoided by installing the fiber optic cable on existing utility poles, where possible, in conduits along bridges, or using directional boring following prescribed buffers and drill depths as determined by WDOE and WDFW. In areas without enough room to excavate in the open ROW (areas where the road embankment fills the whole ROW, or in areas where wetlands fill most of the ROW, precluding directional boring), the conduit would be installed within the road prism per ROW standards using a side-arm attachment on the equipment to ensure that all disturbance is within the ROW and outside protected areas.

Reclamation land and irrigation ditches or canals would be crossed. Impacts would be avoided by using the above methods, except that boring under irrigation ditches or canals would not occur. With these above mitigation measures, no impacts on irrigation water quality or quantity is anticipated.

### **Temporary**

Storm water would be the primary source of runoff during the life of the project. During construction, the interaction of storm water to exposed surfaces could result in increased levels of sediment. Sediment would be controlled by using BMPs, such as installing fabric-filter fencing, straw-filled “logs,” or equivalent products, which would be placed across the downhill slopes (with 3 percent or steeper grade) of each borehole or box excavation to limit offsite sedimentation.

Alternative 2 would have no impacts on hydrology as no drainage patterns would be altered by the project. All ground-disturbing activities must match pre-existing conditions, and where vegetation is removed, the area would be reseeded with an appropriate certified seed mix.

## **4.8 Wetlands**

### **Affected Environment**

The project route crosses multiple wetlands and waters of the United States and Washington State. There are 37 wetlands in or near the project area. Of these, 22 are mapped in the *USFWS National Wetlands Inventory Mapper* and were confirmed during our February 2015 investigative survey, while 15 are unmapped and identified during our investigative survey. In

the following counties, we found 7 in Kittitas, 16 in Grant, 4 in Adams, 6 Franklin, 2 Benton, and 2 in Umatilla.

Based on GIS analysis of the National Hydrography Dataset, Segment 1 has 53 waterbody crossings under WDFW jurisdiction, the majority are ditches or canals. In Kittitas County: Wilson Creek, Mercer Creek, Coleman Creek, Naneum Creek, Cooke Creek, Caribou Creek, Park Creek, Schnebly Coulee, Ryegrass Coulee, and the Columbia River are crossed. Segment 2 has 22 water body crossings under WDFW jurisdiction. In Grant County: Winchester Wasteway, Frenchman Hills Wasteway, and Crab Creek are crossed. In Franklin County: only the Esquatzel Coulee and the Columbia River are crossed. Finally, in Benton County, the Columbia River is crossed. In addition, the project crosses over the Columbia River three times: at the I-90 Bridge between Kittitas County and Grant County, at the Highway 397 Bridge in Pasco, and the I-82 Bridge to Umatilla, Oregon.

## **Environmental Consequences**

### ***Alternative 1 - No Action***

Alternative 1 would not result in impacts on wetlands or waters of the United States or Washington State.

### ***Alternative 2 – Consent to Use Permit***

Alternative 2 is not anticipated to have impacts on wetlands, waters of United States or waters Washington State, because all jurisdictional wetlands and waters would be avoided. The I-90 Bridge crossing would be constructed by attaching conduit to the bridge exterior, the crossing at the Highway 397 Bridge would use existing CenturyLink conduits, and the crossing at the I-82 Bridge would be constructed by placing cable through the existing bridge ductwork. The Corps requires a Section 10 permit for the two bridge crossings that would need installations of new conduit along the bridge structure; WDNR requires Aquatic Use Authorizations for the I-90 and I-82 crossings. These permits have been procured.

For other water bodies and wetlands within the project corridor, the following five methods would be employed to avoid temporary and permanent impacts on wetlands and waters:

1. Aerial installation is the preferred method of installation wherever possible in areas with existing utility poles, as this method requires no ground disturbance. Many of the streams, canals, ditches, and wetlands would be avoided using aerial installation.
2. If aerial installation is not feasible, attaching the cable to existing bridges or directional boring would be used to avoid any impacts on the waterbody or wetlands, following prescribed buffers and drill depths as designated by the appropriate agencies.
3. Utility handhole/access points would be excavated outside all streams, drainages, and jurisdictional wetlands, including the required buffers associated with these features.
4. Directional boring would occur within current roadway ROW at the edge of the roadway or pavement and below currently installed roadway culverts. Entry and exit directional boring

holes would be kept as small as possible, generally less than 36 square feet and would be located a minimum of 75 feet away from the centerline of the waterway to avoid impacts on waterways and any water features that are present.

5. If the water body or wetland crosses the entirety of the ROW and directional boring will not be used, the fiber optic cable will be placed in the road embankment outside the stream or wetland, in existing conduit buried within the ROW, or in a conduit along a bridge crossing.

No fill or dredging would occur in surface waters or wetlands due to the avoidance measures stated above; therefore, Clean Water Act permits (Section 404 and Section 401) would not be required for the proposed project. WDFW requires hydraulic approval for each stream crossing where directional boring is employed below the streambed, a total of 14. WDNR requires Aquatics Use Authorizations for the crossings over the Columbia River. These authorizations have been procured. Environmental commitments are stated in the next section.

## **4.9 Mitigation**

The following commitments would be included as part of the Alternative 2 to reduce environmental consequences:

### **Avoidance**

- The project will remain in existing road ROW to minimize impacts and will avoid all wetlands, streams, floodplains, and other significant areas by either boring underneath them or attaching the fiber optic cable to existing utility poles or existing conduit.
- To avoid disturbance within water, wetlands, and floodplains directional boring would be used, following prescribed buffers and drill depths as determined by the WDFW, WDOE, and Reclamation.
- Cable would be installed on existing utility poles, where possible.
- Cable would be installed in existing conduit where possible.

### **Biological Resources**

#### **Fish and Wildlife**

- Targeted preconstruction surveys would be conducted for species that could be in the project ROW, depending on their tolerances and habitat needs.
- If a protected plant species is found, a no-construction buffer would be designated in consultation with the USFWS. Plants would be avoided by shifting the location of the boreholes, shifting trenching route as needed, or trenching on the edge of the road pavement. If necessary, plants may also be avoided by boring under them.
- No trees would be removed. If active nests are found within the project corridor, a no-construction buffer would be established around the nest until chicks have fledged, in coordination with the USFWS.

- Burrows would be avoided by shifting the trenching route 4 to 5 feet as needed or by trenching on the edge of the road pavement. If necessary, burrows would also be avoided by boring under them.

### **Vegetation**

- Vegetation would be left in place at staging areas for boreholes and box excavations and other areas where an excavator is needed to reach proper cable burial depth.
- Equipment and vehicles would be clean of soil and potential noxious weed seeds and plant parts prior to commencing construction and at the end of each day.
- Disturbed areas would be revegetated with seed mix certified as “Prohibited and Restricted Noxious Weed Free for the State of Washington.”
- All pits must be weed free and fill material will be Washington State certified weed free.

### **Hazardous and Toxic Materials**

- If the certified environmental consultant determines that the suspected contamination could have an impact on human health and the environment or is of public concern, the consultant will contact WDOE or ODEQ.
- If any excavated utility trench material has a petroleum odor or other apparently artificial odor, or the material appears to have unusual color that is suspect, work would be stopped in that area and the on-call certified environmental consultant would be notified to make an assessment.
- The contractor would have a hazardous material containment and cleanup kit on hand during construction activity near the Puregro Quincy hazardous site.
- All contamination would be handled and disposed of in accordance with a WDOE-approved action plan.

### **Water Quality and Wetland**

- If aerial installation is not feasible, attaching the cable to existing bridges or directional boring would be used following prescribed buffers and drill depths, as designated by the appropriate agencies, to avoid any impacts on the water body or wetlands.
- All work would be conducted landward of required stream, canal, and wetland buffer distances as defined by local critical area ordinances.
- Directional boring would occur within current roadway ROW at the edge of the roadway or pavement and below currently installed roadway culverts. Entry and exit directional boreholes would be kept as small as possible, generally less than 36 square feet and located a minimum of 75 feet away from the centerline of the waterway to avoid impacts on waterways and any water features present

- If the waterbody or wetland crosses the entire ROW and directional boring will not be employed, the fiber optic cable will be placed in the road embankment outside the stream or wetland or in existing conduit buried within the ROW or a conduit along a bridge crossing.
- Project contractors would be responsible for developing and successfully implementing a SWPPP, which could require additional BMP and specific reporting requirements during construction.
- The operator would use discretion when installing erosion control devices along cable furrows. Such devices would be installed when the cable furrow is cut into steep-sided slopes or road prism edges that were poorly vegetated or extremely erosive.
- In the event that excavated materials need to be stockpiled, they will be stockpiled in areas outside drainage ditches and channels that may periodically carry storm water.
- In the event that excavated utility trench material cannot be placed back in the trench within a working shift of being excavated, or if there is precipitation or high winds, the excavated material would be covered until it is placed back in the trench at the next available shift.

## **5. Consultation and Coordination**

Regulatory agency and local government coordination on this project has been extensive and ongoing since project inception. Federal, state, and local governments and regulatory agencies were consulted early and have been involved throughout the project design. Agency comments and results of agency site visits have been incorporated into the design process and used to avoid and minimize impacts on protected resources. The following table describes the agency consultation that has taken place for this project.

All identified State and Federal stakeholders were contacted and provided opportunity to comment and express concerns regarding this project. The U.S. Army Corp of Engineers and USFWS have coordinated with Reclamation on wildlife and realty concerns. USFWS has expressed concerns regarding the Monarch Butterfly and associated habitat adjacent to the cable

route. Reclamation will require ZAYO to incorporate within the restoration seed mix Showy Milkweed seed. The Monarch Butterfly uses Showy Milkweed during its life-cycle.

The public has been involved in reviewing impact assessments associated with this project in conjunction with the Washington Department of Ecology Construction Storm Water General Permit review and State Environmental Policy Act (SEPA) public comment period. The SEPA Determination of Non-Significance was issued on August 20, 2015. No public comments were received during the review process.

<b>Table 4 – Agency Coordination Activity</b>		
<b>Date</b>	<b>Activity</b>	<b>Description</b>
2/2/15	Correspondence with WDOE – David Moore, Eastern Region, Spokane Office	WDOE concurred that the Zayo Group would not be required to seek coverage under Section 401 Clean Water Act permitting if the proposed project does not require coverage. If no permit is required, then a wetland delineation would not be required if all wetlands and streams are avoided.
2/2/15	Correspondence with WDOE – Cathy Reid, Central Region, Yakima Office	WDOE concurred that the Zayo Group would not be required to seek coverage under Section 401 Clean Water Act permitting if the proposed project does not require coverage. If no permit is required, then a wetland delineation would not be required if all wetlands and streams are avoided.
2/4/15	Correspondence with WDOE – Terri Costello, Eastern Region, Spokane Office	WDOE stated that in November 2014 the Governor’s Office for Regulatory Innovation and Assistance (ORIA) would take the lead on SEPA coordination and approvals. Joseph Rangel at ORIA would take the lead for SEPA coordination efforts.
2/4/15	Correspondence with Governor’s Office for Regulatory Innovation and Assistance – Joseph Rangel	ORIA stated that conversations with the five counties where the project crosses had occurred and Grant County would be the SEPA lead agency for the project. ORIA would assist coordination of such efforts.
2/5/15	Correspondence with the Corps – Tim Erkel, Seattle District, Spokane Office	The Corps concurred that the Zayo Group would not require coverage under Section 404 Clean Water Act permitting if the proposed project either 1) avoids all wetlands and streams, even by boring under them, and 2) if a plow is used to install the fiber-optic cable. Otherwise the project would need to seek coverage under a Nationwide Permit #12 for Utility Lines.
2/5/15	Correspondence Grant County Planning Department – Damien Hooper, Planning Director	Grant County concurred that they could be the SEPA lead agency with the other counties (Kittitas, Franklins, Adams, and Benton) taking the nominal lead agency SEPA role to assist with the coordination of the SEPA process within their respective counties. They stated that NEPA could satisfy SEPA requirements through adoption of the NEPA findings as meeting SEPA requirements. A standalone SEPA checklist can also be processed separately from the NEPA component of the project.
2/23/15	One-On-One Meeting	The Zayo Group and Stantec Consulting Services Inc. (Stantec) conducted a one-on-one agency meeting with WDFW (in the Ellensburg office) to identify potential jurisdictional stream crossings that would need to be surveyed as part of a Hydraulic Project Approvals (HPA). WDFW and the Zayo Group concurred on the stream crossings and sensitive biological resources to be surveyed during field surveys for the project conducted in late February 2015 for the entire length of the project.
3/13/15	Correspondence with WDOE- Chuck Gruenfelder, Toxic Cleanup Program	WDOE agreed that a 1-mile buffer surrounding the project route was a sufficient basis for reviewing contaminated sites, and outlined reporting requirements and resources available if unexpected or undocumented contamination is discovered during construction.
3/16/15	One-On-One Meetings	Stantec conducted a one-on-one meeting with WDNR regarding rare and protected plant species. Joe Arnett, WDNR Rare Plant Biologist, stated that WDNR has no regulatory authority over rare plants as the State has no laws that protect rare plants. He also stated that it is up to the lead agency to decide what considerations should be given to rare plants.

**Table 4 – Agency Coordination Activity**

Date	Activity	Description
4/6/15	Correspondence with Kittitas County- Doc Hansen, Planning Official	Kittitas County concurred that no county level permits are required for the project and the project will be SEPA-exempt in Kittitas County given that the method of installation will be through existing conduit and no construction or ground-disturbing activities will take place.
4/6/15	Correspondence with WDOE- Bill Fee, Toxic Cleanup Program	WDOE and Stantec agreed on BMP if the contractor encounters contaminated soil while installing fiber optic cable near Puregro Quincy Site (FSID 596).
4/6/15	Correspondence with City of Kennewick- Anthony Muai, Planner	The City of Kennewick concurred that no flood permit is required as long as there are no structures constructed, no watercourses altered, and no change to the base flood elevation. The City of Kennewick also concurred that no land use permits or shoreline permits are required as the project lies more than 200 feet from the ordinary high water mark of river crossings.
4/7/15	Correspondence with Benton County Planning Department- Stephen Donovan, Senior Planner	Benton County concurred that they require no other permits or documentation for the Zayo Fiber Optic Project other than the SEPA checklist.
4/7/15	Correspondence with City of Ellensburg- Kirsten Sackett, Community Development Director	The City of Ellensburg concurred that no critical areas permit is required as the project will not be working with the 85-foot buffer of a designated critical area streams.
4/7/15	Correspondence with Franklin County- Greg Wendt, Assistant Director of Planning and Building Department	Franklin County concurred that the planning and building department has no permitting requirements for the project based on review of the project route and location within the ROW.
4/08/15	Correspondence with WDNR – Shane Early, Southeast Region, Ellensburg Office	WDNR concurred that the Zayo Group would not be required to obtain authorizations for any stream crossings related to the project except for the bridge crossings over the Columbia River. All additional stream crossings would not require authorizations. At the time of the conversation with WDNR, the Zayo Group had already received the authorizations for the bridge crossings over the Columbia River.
4/9/15	Correspondence with City of Pasco- Dave McDonald, City Planner	The City of Pasco concurred that no individual floodplain permits are required for the project, based on review of its current route and use of existing conduit through Pasco.
4/10/15	Correspondence with City of Umatilla- Bill Searles, City Planner	The City of Umatilla concurred that no land use permits are required for the phase of the project which lies in the city limits because it is entire within the State of Oregon’s ROW.
4/23/15	One-On-One Meeting	The Zayo Group and Stantec conducted a one-on-one agency meeting with WDFW (along route in Benton County and at the Pasco office) to evaluate potential project impacts on sensitive biological resources (sensitive species and habitat) identified during late February 2015. WDFW concurred that the project would not have an impact on sensitive biological resources in Benton County, and the risk along other areas of the project route are very low. No further surveys required.
4/18/15	Correspondence with U.S. Bureau of Reclamation – Michael Lesky, Ephrata Office	Reclamation concurred that the project would not have an impact on sensitive biological resources and that Section 7 ESA consultations with the USFWS NMFS would not be required given the project will have no effect on endangered species.
4/28/15	Correspondence with Governor’s ORIA– Anne Knapp	ORIA concurred that they would coordinate the SEPA process and assist with the selection of the lead agency for SEPA compliance. ORIA initially will set up a face to face meeting with all agencies involved in the project and then a SEPA lead agency will be selected. Once the SEPA lead agency is selected the review process for the SEPA checklist and reporting developed by Zayo and Stantec would occur.

**Table 4 – Agency Coordination Activity**

<b>Date</b>	<b>Activity</b>	<b>Description</b>
5/4/15	Correspondence with Kittitas County- Doc Hansen, Planning Official	Kittitas County finds no reason to require a SEPA review and that no land use permits would be required based upon review of the project route and that the entire project would involve existing conduit or replacement of conduit of which Zayo already has an easement for.
5/7/15	Correspondence with Adams County- Loren Wlitse, Building and Planning Director	Adams County concurred that no permits are required for this project that would trigger SEPA, but that the county could not exempt the project from SEPA as it is presented as a single continuous route. Adams County will comment on the SEPA during the notice period stating that there are no issues within the county for this project, thus clearing the SEPA within Adams County.
5/7/15	Correspondence with Benton County- Mike Shuttleworth, Planning Manager	Benton County concurred that SEPA is not required for their county and no land use permits are required. But, because the project is being reviewed as a single, continuous route, Benton will participate in the SEPA process as a consulting agency. Benton County will provide comments during the SEPA notice period.
5/7/15	Correspondence with Franklin County- Greg Wendt, Assistant Director, Planning and Building Department	Franklin County concurred that this is a SEPA exempt project and included an SEPA exemption letter.
5/15/15	Correspondence with WDFW	The Zayo Group consulted with WDFW regarding the proposed project route crossing the Lower Crab Creek Wildlife area that contains U. S. Fish & Wildlife Columbia NWR.

## 6. List of Preparers

<b>Preparer</b>	<b>Title and/or Role</b>
Dan Barcomb	The Zayo Group Project Manager, reviewer
Daniel De Bord	Stantec Environmental Scientist, author, environmental analysis, field surveyor
Owen Haskell, P.E.	Stantec Civil Engineer, author, and environmental analysis
Kacy Hillman, PWS	Stantec Environmental Scientist, reviewer and editor
Ann Marie Larquier	Stantec Environmental Scientist, author, and environmental and GIS analysis
Michael Lesky	Bureau of Reclamation Natural Resource Specialist, reviewer, editor, field surveyor
Sara Lindberg	Stantec Environmental Manager, reviewer and editor
Greg Matuzak	Stantec Environmental Scientist, biological resources evaluation, regulatory compliance, and field surveyor
Matt McMillan	Stantec Landscape Technician, GIS analysis
Ray Plummer, PE	Stantec Civil Engineer, reviewer
Susan Lynn White, RPA	Bureau of Reclamation Archaeologist

## 7. Reference List

- Benton Clean Air Agency, 2015. *Washington Air Quality Advisory*. Accessed online February 25, 2015 at <http://bentoncleanair.org>.
- Oregon Department of Environmental Quality, 2015. *Air Quality*. Accessed online February 25, 2015 at <http://www.oregon.gov/DEQ/AQ>.
- U.S. Fish and Wildlife Service, 2015. *Trusted Resources*. Accessed online February 10, 2015 at [www.ecos.fws.gov/ipac](http://www.ecos.fws.gov/ipac).
- U.S. Fish and Wildlife Service, 2015. *Threatened and Endangered Plant Species List*. Accessed online February 10, 2015 at [www.ecos.fws.gov/ipac](http://www.ecos.fws.gov/ipac).
- Natural Resource Conservation Service, 2015. *Web Soil Survey*. Accessed online February 10, 2015 at <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>.
- Ecology, 2004. Washington State Department of Ecology. *Stormwater Management Manual for Eastern Washington*.
- Walker, 1998. Introduction. In *Plateau*, edited by Deward E. Walker, Jr., pp. 1-7. *Handbook of North American Indians*, Vol. 12, William C. Sturtevant, general editor, Smithsonian Institution, Washington, DC.
- Fortin, Louis W., 2015. *Zayo Fiber Optics Project, Eastern Washington and Oregon, Cultural Resource Survey*. Fortin, Louis W., 2015. On file at Washington Department of Archaeology and Historic Preservation, Olympia.

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# **Appendix A**

## **Cultural Resources Coordination**

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

February 18, 2016

Ms. Dawn Wiedmeier  
Area Manager  
US Bureau of Reclamation  
1917 Marsh Road  
Yakima, WA98901-2058

In future correspondence please refer to:

Project Tracking Code: 2015-12-00335

Property: Zayo Fiber Optics Project, Eastern Washington, Cultural Resource Survey

Re: NO Adverse Effect

Dear Ms. Wiedmeier:

Thank you for the additional information our office requested regarding cultural resources located in the Area of Potential Effect for this undertaking. The above referenced project has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

I agree with your consultant's professional opinion, the resources located at the former Pasco Naval Air Station appear to comprise a district that is eligible for listing to the National Register of Historic Places. I also concur that the current project as proposed will have "NO ADVERSE EFFECT" on National Register eligible or listed historic and cultural resources. If additional information on the project becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

Russell Holter  
Project Compliance Reviewer  
(360) 586-3533  
russell.holter@dahp.wa.gov





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

January 21, 2016

Ms. Dawn Wiedmeier  
Area Manager  
US Bureau of Reclamation  
1917 Marsh Road  
Yakima, WA 98901

In future correspondence please refer to:

Project Tracking Code: 2015-12-0335

Property: Zayo Fiber Optics Project, Eastern Washington, Cultural Resource Survey

Re: More Information Needed

Dear Ms. Wiedmeier:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP). The materials you provided for this project have been reviewed by Dr. Rob Whitlam and myself on behalf of the State Historic Preservation Officer. We concur with the Area of Potential Effect (APE) for this undertaking. Archaeological monitoring should take place at the three sites identified by your consultant (45GR3466, 45BN202, 45BN1443). We also concur that the following archaeological sites are not eligible: 45GR3465, 45GR3467, 45GR3468, 45GR3469, 45GR3470, and 45GR3471.

We concur with the Bureau that the following irrigation resources are eligible:

- Columbia Canal
- Crab Creek Lateral
- Eltopia Branch Canal
- Exquatzel Diversion
- Frenchman Hills Wasteway
- Kennewick Irrigation District Highlift Canal 3
- Potholes East Canal with laterals 14.7, 16.4, 41.2, 46.2, 55
- Royal Branch Canal
- Wahluke Branch with laterals 5, 5.4
- West Canal with Laterals 27, 32, 32.9, 33, 35.9, 37, 38, 38.1, 39, 39.9, 39R, 61, 69, 69.7
- Winchester Wasteway, Ephrata
- Winchester Wasteway, Royal City

We concur with the Bureau that the following structures are eligible:

- Ed Hendler Bridge
- I-82 Columbia River Bridge
- I-90 Columbia River Bridge
- Pasco-Kennewick Transmission system crossing the Columbia River
- Road 8 NW Bridge
- Road O NW Bridge



We concur with the Bureau that the following buildings are eligible:

- 14 E 2<sup>nd</sup> Ave, Kennewick
- 123 E 3<sup>rd</sup> Ave, Kennewick
- 719 S Washington St, Kennewick
- 1514 W 27<sup>th</sup> Ave, Kennewick
- First Christian Church of Kennewick
- Starlight Motel
- Story-Matteson house

Despite the inventory effort made by your consultant, the report contained insufficient information to formulate an opinion on eligibility or for us to render our concurrence on the eligibility of the Pasco Naval Air Station properties. Please have your consultant provide additional information and inventory those structures that appear to have been excluded from the survey and located in this APE such as the hangar structures.

I would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available. These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,



Russell Holter  
Project Compliance Reviewer  
(360) 586-3533  
russell.holter@dahp.wa.gov





# Oregon

Kate Brown, Governor

Parks and Recreation Department  
State Historic Preservation Office  
725 Summer St NE Ste C  
Salem, OR 97301-1266  
Phone (503) 986-0690  
Fax (503) 986-0793  
[www.oregonheritage.org](http://www.oregonheritage.org)



January 20, 2016

Ms. Susan Lynn White  
Bureau of Reclamation  
Ephrata Field Office  
P.O. Box 815,  
32 C Street NW  
Ephrata, WA 98823

RE: SHPO Case No. 15-0848

BOR: Zayo Eastern Washington/Oregon Fiber Optic Project, APP0058233  
Install cable  
None Provided, Umatilla County

Dear Ms. White:

Many thanks for the corrected pages. They address my earlier questions. The only thing I did not see noted in the report is that the archaeologists had proposed having a state permit on hand in case intact soils were later discovered during monitoring of lands in Oregon. In such a case, the permit would allow them to test the surrounding soils that will be impacted for intact cultural remains around site 35UM58. While having the permit in hand may be understood, it doesn't appear to be noted, nor do I see any evidence of Plateau having ever applied for such a permit to date. If intact soils are encountered during project monitoring and the archaeologist has no permit, a 30 day review period for the needed permit could result in a major delay to the project and our office wants to be sure that such an unnecessary delay will not occur. This need to have a permit in hand is not needed to be noted within the report so our review of this document is complete. We just wanted to remind your office and the archaeologist of the potential delay if care is not taken to be prepared for a worse case scenario.

Once the project has been completed, our office looks forward to receiving a copy of the monitoring report associated for the portion of the project within Oregon. For details on what should be included within this monitoring report (e.g., description of observed soils, degree of past disturbance, etc.) please refer to the state's reporting guidelines ([http://www.oregon.gov/oprd/HCD/ARCH/docs/Reporting\\_Guidelines\\_FINAL.pdf](http://www.oregon.gov/oprd/HCD/ARCH/docs/Reporting_Guidelines_FINAL.pdf)).

In order to help us track your project accurately, please be sure to reference the SHPO case number above in all correspondence.

Sincerely,

Dennis Griffin, Ph.D., RPA  
State Archaeologist  
(503) 986-0674  
[dennis.griffin@oregon.gov](mailto:dennis.griffin@oregon.gov)



White, Susan <swhite@usbr.gov>

# RE: [EXTERNAL] Re: Subject: Notice of Basic Scoping Regarding Preparation of EA for Proposed Zayo Eastern WA/OR Fiber Optic Project

1 message

**Wernick, Christopher D NWW** <Christopher.D.Wernick@usace.army.mil>

Fri, Jan 29, 2016 at 8:04 AM

To: "White, Susan" <swhite@usbr.gov>

Cc: "Roberts, Alice K NWW" <Alice.K.Roberts@usace.army.mil>

Susan,

I probably should have stated that, but yes. If the work is done as proposed, there shouldn't be any adverse effect.

Thanks,  
Chris

Christopher D. Wernick  
Archaeologist  
US Army Corps of Engineers  
Walla Walla District  
201 N. Third Ave.  
Walla Walla, WA 99362  
office: 509-527-7297

-----Original Message-----

From: White, Susan [mailto:swhite@usbr.gov]

Sent: Thursday, January 28, 2016 5:21 PM

To: Wernick, Christopher D NWW <Christopher.D.Wernick@usace.army.mil>

Cc: Roberts, Alice K NWW <Alice.K.Roberts@usace.army.mil>

Subject: Re: [EXTERNAL] Re: Subject: Notice of Basic Scoping Regarding Preparation of EA for Proposed Zayo Eastern WA/OR Fiber Optic Project

Chris,

Just as a follow up question- if the edits/revisions are made to the report, am I correct in assuming that you concur with the project effect being "no adverse effect"?

\*\*\*\*\*

Respectfully,  
Susan Lynn White, RPA  
Archaeologist (EPH-2224)  
509-754-0257 (office)  
509-754-0239 (fax)

Ephrata Field Office  
Bureau of Reclamation- US Dept. of Interior  
P.O. Box 815, 32 C Street, NW  
Ephrata, WA 98823

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On Thu, Jan 28, 2016 at 4:14 PM, Wernick, Christopher D NWW <[Christopher.D.Wernick@usace.army.mil](mailto:Christopher.D.Wernick@usace.army.mil)> <<mailto:Christopher.D.Wernick@usace.army.mil>> > wrote:

Good afternoon Susan,

I have included in this message a copy of the comments and a corresponding map. Please look both over and let me know if you have any further questions or concerns.

Thanks,  
Chris

Christopher D. Wernick  
Archaeologist  
US Army Corps of Engineers  
Walla Walla District  
201 N. Third Ave.  
Walla Walla, WA 99362  
office: 509-527-7297

-----Original Message-----

From: White, Susan [<mailto:swhite@usbr.gov> <<mailto:swhite@usbr.gov>> ]  
Sent: Monday, January 25, 2016 3:40 PM  
To: Wernick, Christopher D NWW <[Christopher.D.Wernick@usace.army.mil](mailto:Christopher.D.Wernick@usace.army.mil)>  
<<mailto:Christopher.D.Wernick@usace.army.mil>> >  
Cc: Roberts, Alice K NWW <[Alice.K.Roberts@usace.army.mil](mailto:Alice.K.Roberts@usace.army.mil)> <<mailto:Alice.K.Roberts@usace.army.mil>>  
>; Richard Cornett <[rcornett@usbr.gov](mailto:rcornett@usbr.gov)> <<mailto:rcornett@usbr.gov>> >  
Subject: Re: [EXTERNAL] Re: Subject: Notice of Basic Scoping Regarding Preparation of EA for Proposed Zayo Eastern WA/OR Fiber Optic Project

Super, Chris, thanks very much for the update!

If you can scan your reply letter and send via email, that would help tremendously with the time crunches.

Thanks again, looking forward to your comments.

\*\*\*\*\*

Respectfully,  
Susan Lynn White, RPA  
Archaeologist (EPH-2224)  
509-754-0257 (office)  
509-754-0239 (fax)

Ephrata Field Office  
Bureau of Reclamation- US Dept. of Interior  
P.O. Box 815, 32 C Street, NW  
Ephrata, WA 98823



White, Susan &lt;swhite@usbr.gov&gt;

**Re: Review & Comments for Zayo Fiber Optic 200-mile line**

1 message

**Valentine, Nick** <nick\_valentine@fws.gov>

Tue, Jan 26, 2016 at 1:35 PM

To: "White, Susan" &lt;swhite@usbr.gov&gt;

Thanks. That approach sound fine to me.

On Tue, Jan 26, 2016 at 12:52 PM, White, Susan &lt;swhite@usbr.gov&gt; wrote:

Nick,

Thanks so much for your prompt reply and all the hard work you dedicated for reviewing this project and the resources surveyed. To first answer your question, no, I do not believe it is necessary to craft a formal reply; your email reply is sufficient.

I have submitted your comments regarding the built environment for review, so no worries there. To address your question & comments regarding the archaeology- specifically 45BN202 & BN1443- the site boundaries are actually outside of our project's APE so I thought it best to have the project as "no effect" unless they hit something. But I also understand your thinking about it being "no adverse effect"; I went back & forth a few times about it before deciding.

In the end, we agree that there will be "no adverse effect" for the project on identified resources with the stipulation of monitoring (with the built environment resources not being affected by the project), am I correct? Hope so.

No worries about replying, unless you disagree with any of the conclusions I've stated here. Thanks again for the thorough review (it was not necessary, I just wanted to get a reply from you that you had received the report and were not worried about any USFWS resources being impacted. Have a good one!

.....  
Respectfully,  
Susan Lynn White, RPA  
Archaeologist (EPH-2224)  
509-754-0257 (office)  
509-754-0239 (fax)

Ephrata Field Office  
Bureau of Reclamation- US Dept. of Interior  
P.O. Box 815, 32 C Street, NW  
Ephrata, WA 98823

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On Mon, Jan 25, 2016 at 4:06 PM, Valentine, Nick &lt;nick\_valentine@fws.gov&gt; wrote:

Susan-

I'm sorry I did not realize that you anticipated my review of the entire document. If we discussed that possibility I simple forgot.

In the chaos of the holidays, and an after holiday office re-organization, I only gave a quick look at the documents sent to me. With a little extra attention to the sections applicable to USFWS fee title or

managed lands. That quick look included a look at your Table 1 (Resource Eligibility and Project Effect) and noted that none of the previously recorded USFWS sites were included. Presumably because they are outside of the direct APE. I also noted that the document was a final. Therefore no comment or changes from me were required. I moved on to more pressing issues. Again sorry of the misunderstanding on my part.

My primary involvement was the issuance of an ARPA permit for the contractor. The conditions of the USFWS ARPA permit have been met.

The changes I requested to the draft document, mostly adding a discussion of the historic town-site (ruins) of Corfu, were adequately addressed.

Today I've given a more through look at the three sites on USFWS lands in close proximity to the APE: 45GR3424 a lithic scatter, 45GR3430 a lithic scatter, and 45GR3432 a historic scatter, have not had their eligibility formally determined and are therefor considered potentially eligible. These sites, and what ruins of Corfu exist, are (apparently) outside of the direct APE. Therefore no USFWS managed sites will be effected. Had any of the probes been positive, or any staging off the road in that section had been proposed we would probably recommend monitoring.

#### THE REST OF THE TABLE

I took a look the other sites and the determinations of effect (Table 1). For the most part I agree with the consensus determination and have so marked in the table. I took a closer look at the ones in contention (Bold font under Reclamation columns). Any disagreement between Reclamation's determination and USFWS will be in **Bold Red Font in the** excel table.

Example 45BN202 & BN1443 you changed the contractor's Not Evaluated to Potentially Eligible (I agree that is the better term) and switched to No Effect with stipulation of monitoring. I think that would "No Adverse Effect . . ." Unless there is some aspect I missed? I'd treat anything determined eligible to be no adverse effect over no effect.

There were a number of buildings and structures for which there was disagreement. From the data I was presented (Report and Appendices) I was not, in most cases, able to decide why some were determined **Eligible**. Perhaps I missed some additional documentation? So I went with the Consultant recommendation (lacking any better evidence) for my entry in the table.

The Pasco NAS you marked several as "Not Individually Eligible/Contributing Only" I'd go along with this idea except that there is no recorded district or landscape to which they contribute. They should be "Not Eligible" or "Not Individually Eligible/**Potentially** Contributing Only" My exception here is the Parachute Loft (Bldg. 39) which you and the contractor find eligible due to it's unique architecture. Looks to me to be a fairly typical WWII Parachute Loft. I think it looses integrity without context, i.e. the contributing elements to the district (air station) so in my opinion does not warrant eligible status. However the Service Station (Bldg. 67) was evaluated at the local level, which may make it eligible. The parachute loft may also have local or state significance.

Will you need a formal memo of these comments?  
Spreadsheet attached.

On Fri, Jan 22, 2016 at 6:13 PM, White, Susan <[swhite@usbr.gov](mailto:swhite@usbr.gov)> wrote:  
Hey Nick,

I hope this email finds you well!

I was just checking in about your review and comments for the CRS report for the Zayo Fiber Optic 200-mile project. I had Fed-Ex'd the big report and understand that y'all received it around December 18th. I have attached a scan of our 106Consult letter and the Resource Elig/Project Table for easy reference.

As you may already know, the project proponent is quite anxious to conclude the Sec. 106 process. I had noted that the end of the 30-day review period was January 17th, but I thought not to pester you about it until the end of this/ beginning of next week. I wondered if it were possible to give a rough guess on a

date you could provide comments?

I very much appreciate the time and effort you are dedicating to review this very large report. Please let me know if there is anything I can do to help or if you have any questions or concerns. Thanks very much and have a great week.

\*\*\*\*\*

Respectfully,  
Susan Lynn White, RPA  
Archaeologist (EPH-2224)  
509-754-0257 (office)  
509-754-0239 (fax)

Ephrata Field Office  
Bureau of Reclamation- US Dept. of Interior  
P.O. Box 815, 32 C Street, NW  
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--  
NICHOLAS VALENTINE  
USFWS ARCHAEOLOGIST  
20555 SW GERDA LN  
SHERWOOD OR 97140-8306

T: 503 625 4377  
F: 503 625 4887  
C: 503 803 8156

--  
NICHOLAS VALENTINE  
USFWS ARCHAEOLOGIST  
20555 SW GERDA LN  
SHERWOOD OR 97140-8306

T: 503 625 4377  
F: 503 625 4887  
C: 503 803 8156



White, Susan &lt;swhite@usbr.gov&gt;

**RE: Conference Call CCT/BOR/Zayo - Zayo Fiber Optic Project**

1 message

Guy Moura (HSY) &lt;Guy.Moura@colvilletribes.com&gt;

Mon, Feb 8, 2016 at 3:04 PM

To: Susan White &lt;swhite@usbr.gov&gt;

Cc: Dawn Wiedmeier <dwiedmeier@usbr.gov>, Deborah Van Meter <dvanmeter@usbr.gov>, James Crooker <james.crooker@zayo.com>, "McKinley, Candace" <cmckinley@usbr.gov>, "Robert Sloma (HSY)" <Robert.Sloma@colvilletribes.com>, Clinton Wertz <cwertz@usbr.gov>, Corey Carmack <ccarmack@usbr.gov>, Dan Barcomb <dan.barcomb@zayo.com>, "Carmack, Corey P' (CCarmack@usbr.gov)" <CCarmack@usbr.gov>, "Brenda Covington (HSY)" <Brenda.Covington@colvilletribes.com>

Dear Susan,

Pursuant to our joint discussions this morning between Reclamation, the History/Archaeology Program of the Confederated Tribes of the Colville Reservation, and Zayo Group concerning the Zayo Fiber Optic Project, we made the following determination. Some of this may be redundant information. We acknowledge Reclamation as the lead agency for this project. We concur this is an undertaking with the potential to adversely impact significant historic properties. We are resolved to concur with the APE. We concur with the level for effort expended to document significant historic properties, with the following stipulations.

1. Additional evaluation will occur at some prehistoric sites in Grant County. Given the scope of the undertaking, further evaluation can run concurrently with the implementation of project construction/fieldwork.
2. Monitoring occur at sensitive locations along the project corridor and at the aforementioned sites.

We hope this addresses some of the issues at hand and allows the proponent to move forward with the Zayo Fiber Optic Project. Please let me know if this contradicts your understanding of our discussions this morning.

We appreciate your time, patience, and forbearance in the face conflicting nuances of such concepts as "evaluation", "eligibility", and "APE" amongst multiple parties.

Thank you for consulting with the Confederated tribes of the Colville Reservation.

lim læmt, qe?ciéwyew (thank you)

Guy Moura

Program Manager, History/Archaeology

Tribal Historic Preservation Officer

Confederated Tribes of the Colville Reservation

(509) 634-2695

**From:** McKinley, Candace [mailto:cmckinley@usbr.gov]

**Sent:** Thursday, February 04, 2016 4:19 PM

**To:** Robert Sloma (HSY); Guy Moura (HSY); Clinton Wertz; Susan White; Corey Carmack; Dan Barcomb; James Crooker

**Cc:** Dawn Wiedmeier; Deborah Van Meter

**Subject:** Conference Call CCT/BOR/Zayo - Zayo Fiber Optic Project

Greetings,

I have set up a conference call to further discuss the Zayo Fiber Optic Project to ensure that all questions are answered so that we can complete consultation.

I appreciate everyone's availability to take the call on such short notice.

The conference call is on **Monday, February 8 at 11 am.**

The call in number is:

**877-501-4456**

**passcode: 18926626**

Thanks!

Candy

—

Candy McKinley

Environmental Program Manager

Bureau of Reclamation

2/8/2016

DEPARTMENT OF THE INTERIOR Mail - RE: Conference Call CCT/BOR/Zayo - Zayo Fiber Optic Project

Columbia-Cascades Area Office

1917 Marsh Road

Yakima, WA 98901

509/575-5848 x232



White, Susan &lt;swhite@usbr.gov&gt;

---

**Re: Zayo Fiber Optic Line (200 mile)-- Response to Yakama Nation Review letter**

1 message

**Corrine Camuso** <ccamuso@yakama.com>

Wed, Jan 20, 2016 at 9:37 AM

To: "White, Susan" &lt;swhite@usbr.gov&gt;

Cc: "Whitlam, Rob (DAHP)" &lt;Rob.Whitlam@dahp.wa.gov&gt;, Richard Cornett &lt;rcornett@usbr.gov&gt;, "Doncaster, Kelsey" &lt;kdoncaster@usbr.gov&gt;, James Crooker &lt;james.crooker@zayo.com&gt;, David Harder &lt;dharder@plateau-crm.com&gt;

Thank you Susan. We have reviewed the revised report sections and find the corrections acceptable. We appreciate the efforts to address our concerns. There are no further comments at this time. As the project progresses, please keep our program informed of any discoveries particularly as monitoring commences in the vicinity of previously documented sites.

Thanks!

Corrine

Corrine Camuso  
Yakama Nation  
Cultural Resources Program Archaeologist  
Office 509-865-5121 ext 4776

---

**From:** White, Susan <swhite@usbr.gov>**Sent:** Tuesday, January 19, 2016 4:04 PM**To:** Corrine Camuso**Cc:** Whitlam, Rob (DAHP); Richard Cornett; Doncaster, Kelsey; James Crooker; David Harder**Subject:** Zayo Fiber Optic Line (200 mile)-- Response to Yakama Nation Review letter

Corrine;

Thank you very much for your patience as we have gathered the edits and information to address your questions and concerns regarding Section 106 consultation for the Zayo Fiber Optic Line (200 mi) project.

I have attached your review letter dated 30Dec15 for easy reference. I've also attached a letter that would forwarded earlier from Zayo (via myself) regarding construction activities in Kittitas County for easy reference.

Hopefully the Zayo response letter addresses the first bullet of your concerns outlined in your letter.

The other three attachments are revised pages of the CRS report completed by Plateau Investigations are to address your concerns outlined in the second bullet of your review letter. From a brief review of the attached revised pages of the CRS report, I think we have addressed all your questions and concerns, as outlined in your review letter dated 30Dec15. If the revised report pages and additional info does address all your concerns, my apologies. Please let me know at your earliest convenience any outstanding questions or concerns that you may have.

Thanks in advance for both your time and efforts on our behalf. I look forward to hearing from you soon.

\*\*\*\*\*

Respectfully,

Susan Lynn White, RPA  
Archaeologist (EPH-2224)  
509-754-0257 (office)  
509-754-0239 (fax)

Ephrata Field Office  
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White, Susan &lt;swhite@usbr.gov&gt;

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**RE: Zayo Map question**

1 message

**Carey Miller** <CareyMiller@ctuir.org>

Wed, Feb 10, 2016 at 10:16 AM

To: "swhite@usbr.gov" &lt;swhite@usbr.gov&gt;, Richard Cornett &lt;rcornett@usbr.gov&gt;

Cc: Dan Barcomb &lt;Dan.Barcomb@zayo.com&gt;, James Crooker &lt;james.crooker@zayo.com&gt;

Susan,

We appreciate the corrections being made in the cultural resource report and the inadvertent discovery plan for the ZAYO project. We will not need a new paper copy of the report so long as we receive the FINAL revised report and appendices on a cd similar to the draft version.

I spoke with James Crooker this morning and indicated the CTUIR would like a monitor on-site for the portion of the proposed line in Kennewick along SR397 south to E 3rd Avenue unless the conduit is going to be placed in a trench previously excavated for utilities. Mr. Crooker indicated that existing conduit may be utilized in this stretch. This would be preferable and no monitoring would be needed. If this is met, the CTUIR is fine with the project moving forward.

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Thank you for your hard work on this project.

Carey

**Carey L. Miller**

Tribal Historic Preservation Officer/Archaeologist

Confederated Tribes of the Umatilla Indian Reservation

Cultural Resources Protection Program

46411 Timine Way, Pendleton, OR 97801

ph. (541)429-7234

[careymiller@ctuir.org](mailto:careymiller@ctuir.org)

Office Hours: Monday-Thursday

**From:** James Crooker [mailto:[james.crooker@zayo.com](mailto:james.crooker@zayo.com)]**Sent:** Wednesday, February 10, 2016 9:51 AM**To:** Carey Miller**Cc:** [swhite@usbr.gov](mailto:swhite@usbr.gov); Dan Barcomb**Subject:** Re: Zayo Map question

Carey,

As a followup to our phone conversation regarding monitoring of our work, Zayo agrees to provide advance notice for any excavation work within 1/3 of a mile from the Columbia River in Kennewick.

I will also provide an update if we are able to secure additional conduit from a third party so that we can cross this off our list of areas requiring monitoring.

Thank you

On Wednesday, February 10, 2016, James Crooker <james.crooker@zayo.com> wrote:

Carey,

As a follow-up to my voice message, I am available to talk through your questions so that we can tie off all your concerns regarding the monitoring. Susan mentioned that she is waiting on our final concurrence. We are highly motivated to begin our work.

I will be leaving the Tri-Cities around 10am – I can divert and visit you if needed. Alternately, I can set up a live-meeting and call with you as soon as you are available.

Thanks

**James Crooker**  
Area Director – Operations West | Zayo Group

22651 83rd Ave S Kent, WA. 98032

O: [720.627.8587](tel:720.627.8587) M: [360.450.5006](tel:360.450.5006) [james.crooker@zayo.com](mailto:james.crooker@zayo.com)

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**From:** James Crooker [mailto:james.crooker@zayo.com]  
**Sent:** Monday, February 08, 2016 11:41 AM  
**To:** Carey Miller  
**Cc:** [swhite@usbr.gov](mailto:swhite@usbr.gov)  
**Subject:** Re: Zayo Map question

Carey

The orange line is our proposed new underground / blue is proposed new aerial. The area north of the river extends the existing conduit considerably further than your initial understanding, but I would be happy to review the map with you again in real-time so that you can provide Susan any formal responses past that you've already sent over.

I'll be in the Tri-Cities the next few days and can make myself available face to face at your office as well if that is helpful.



White, Susan &lt;swhite@usbr.gov&gt;

---

**RE: Zayo Fiber Optic Project- Wanapum Tribe review & comments**

1 message

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**Lela Buck** <Lbuck@gcpud.org>  
To: "White, Susan" <swhite@usbr.gov>

Mon, Feb 22, 2016 at 1:24 PM

Hi Susan,

Afternoon phone tag... Yes, we have been in discussions with Zayo and we are working with them through NW Anthropology to fulfill our needs and have no problem with the project moving forward.

Thank you for your patience and if any questions or concerns come up we will contact you right away.

Thanks,

Lela

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**From:** White, Susan [mailto:swhite@usbr.gov]  
**Sent:** Monday, February 22, 2016 12:36 PM  
**To:** Lela Buck  
**Cc:** Whitlam, Rob (DAHP); Richard Cornett  
**Subject:** Re: Zayo Fiber Optic Project- Wanapum Tribe review & comments

Hi Lela,

I hope this email finds you well and having enjoyed a nice weekend!

Thanks very much for your voicemail this morning; sorry I was not at my desk. I was, just now, able to return your call, but understandably it's lunchtime and there was no answer. Since there's not an answering machine for me to leave a message, I thought it quickest to reply via email.

I just wondered, was there a formal concurrence letter (with the stipulation of CR monitoring by NW Anthropology for the Wanapum Tribe) created and, if so, has it already been mailed? If you indeed mailed a letter already it might have been mailed to our Area Office in Yakima and that's why there's some delay in "funneling down" to our office.

As long as you, as a rep for the Wanapum Tribe, are satisfied with the project moving forward, with the proponent, Zayo, having attended to your concerns adequately, then I'm fine with closing the Sec. 106 consultation process for now.

However, if, at any time, during construction activities you have any concerns or questions about the archaeological or tribal monitoring, then please let me know ASAP and I will re-open the consultation and address your concerns promptly.

Please let me know if I should expect a hard copy letter soon and if you have any questions or concerns as we move forward with the project. Thanks so much for your patience and efforts on our behalf!

\*\*\*\*\*

Respectfully,

Susan Lynn White, RPA

Archaeologist (EPH-2224)

509-754-0257 (office)

509-754-0239 (fax)

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On Tue, Feb 16, 2016 at 10:04 AM, Lela Buck <[Lbuck@gcpud.org](mailto:Lbuck@gcpud.org)> wrote:

Good morning,

Yes, I had originally intended to send out a response Thursday or by end of day Friday. However I found out I needed to update other individuals and get there concurrence.

That is no problem. Thank you for staying on top of it and continuing to remind me. It's my priority today to

get a go ahead to send a formal response.

Thanks Susan,

Lela

**From:** White, Susan [mailto:swhite@usbr.gov]  
**Sent:** Thursday, February 11, 2016 4:37 PM  
**To:** Lela Buck  
**Cc:** James Crooker  
**Subject:** Re: Zayo Fiber Optic Project- Wanapum Tribe review & comments

Hey Leela,

I am just checking in with you regarding your discussion with Mr. Crooker and possibly obtaining your concurrence?

I am so sorry to pester you about it but, as you probably already know, Mr. Crooker is quite anxious to conclude the Sec. 106 consultation and the Wanapum Tribe is the last tribe we need a response from, so any help would be dearly appreciated.

Thanks so much for both your patience and efforts on our behalf!

Respectfully,

Susan Lynn White, RPA

Archaeologist (EPH-2224)

509-754-0257 (office)

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On Thu, Feb 11, 2016 at 9:52 AM, Lela Buck <[Lbuck@gcpud.org](mailto:Lbuck@gcpud.org)> wrote:

Susan,

I will send an email by end of day today.

Thanks,

Lela

**From:** White, Susan [mailto:[swhite@usbr.gov](mailto:swhite@usbr.gov)]  
**Sent:** Wednesday, February 10, 2016 12:38 PM  
**To:** Lela Buck  
**Cc:** Richard Cornett; Whitlam, Rob (DAHP); James Crooker  
**Subject:** Re: Zayo Fiber Optic Project- Wanapum Tribe review & comments

Leela,

I hope this email finds you well. I am just following up on your meeting the project proponent, James Crooker with Zayo Fiber Optic Cable (FOC), yesterday to discuss and come to an agreement regarding your areas of concerns to ensure that archaeological/tribal monitoring would occur.

If your discussions with Mr. Crooker

, and their contracting with your selected CR consultants to conduct the tribal monitoring on the Wanapum Tribe's behalf, have satisfied

your concerns regarding sensitive areas to the Tribe

, I wondered if you could reply to this email with

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This concurrence would be, of course, with the stipulation that the proponent follows the guidelines you have agreed upon regarding tribal monitoring.

We can then incorporate your reply into

the Sec. 106 compliance documentation as well as the Environmental Assessment (EA) appendix for correspondence.

Then the Zayo FOC project can move forward towards construction activities. I know the proponent is anxious to complete both the Sec. 106 consultation and the EA quickly; but, of course, with the caveat of addressing all tribal concerns.

Please do not hesitate to contact me with any question or concerns via email or phone, whatever works best for you. I appreciate your time and efforts on our behalf to complete the Sec. 106 consultation and I look forward to your reply. Thanks very much!

\*\*\*\*\*

Respectfully,

Susan Lynn White, RPA

Archaeologist (EPH-2224)

509-754-0257 (office)

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On Mon, Feb 8, 2016 at 7:54 PM, White, Susan <[swhite@usbr.gov](mailto:swhite@usbr.gov)> wrote:

Leela,

Thanks very much for your time today on the phone as well as your time and efforts in reviewing this project.

I understand that you will be meeting with the project proponent, James Crooker with Zayo Fiber Optic, to discuss your areas of concerns to ensure that archaeological/tribal monitoring will occur in those areas. Please let me know if you have any questions or concerns with your discussions with Mr. Crooker, archaeological monitoring plan, etc.

If your discussions with Mr. Crooker satisfy your concerns regarding sensitive areas to the Wanapum Tribe and you concur with our determination of "no adverse effect" for the project, please reply via email or regular mail with your concurrence so we will have the documentation to move forward with the project. If there are stipulations or caveats that you would like to include in your concurrence, please feel free to do so and they will be incorporated into the Sec. 106 compliance documentation as well as the Environmental Assessment (EA) appendix for correspondence.

Thanks again very much for both your time and efforts on our behalf for this project!

\*\*\*\*\*

Respectfully,

Susan Lynn White, RPA

Archaeologist (EPH-2224)

509-754-0257 (office)

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