ACS
Alaska Communications Systems

1 February 2008

Mr. Brad Smith
NOAA Fisheries Service
Protected Species Division
222 West 7th Ave., #43, Room 517
Anchorage, AK 99513

Subject: Alaska Communications Systems Fiber Optic Cable Project

Dear Mr. Smith:

Alaska Communications Systems Group (ACS) is the leading integrated communications provider in Alaska. We provide communications services to three-fourths of the state's population, serving 74 communities, including the population centers of Anchorage, Fairbanks, Juneau, Kenai/Soldotna, Kodiak, and Sitka. To meet the growing need for communications capacity between Alaska and the remainder of the United States, as well as to provide redundancy to improve the reliability of the existing network, ACS is planning a new submarine cable telecommunications system, called SPANDEX, linking the continental United States to Alaska. The proposed submarine cable will be installed between Florence, Oregon, and Homer, Alaska. A short marine segment will complete the connection from Nikiski to Anchorage. In the future, a branch off the main cable to the Alaskan Panhandle may be implemented as an extension to the SPANDEX system.

The intent of this letter is to inform the National Oceanic and Atmospheric Administration (NOAA) Fisheries Service of the project purpose and description and to confirm that no issues of concern related to the Marine Mammals Protection Act and Essential Fish Habitat exist. We have discussed project details, such as route and construction methods, with both you and Matt Eagleton of the Habitat Conservation Division. Project staff have also had contact with LCDR David Zezula with the Office of Coast Survey. As a result of these communications, it is our understanding that, related to this project, no issues of concern for marine mammals or Essential Fish Habitat exist that have not been addressed through project planning and permitting activities. Specific issues addressed in our conversations have included the following:

- Essential Fish Habitat issues will be addressed with the Alaska Department of Fish and Game during their review of the project.
- The marine route and cable-laying techniques are designed to minimize interaction with anglers and their fishing gear using measures such as routing cable through the Gulf of Alaska Slope Conservation Zone.
- Cable will be buried to a specification of 1.2 meters (m) when possible in all areas with water depths of 1,500m or less. Routing was planned specifically to maximize the chance of burial. Cable armoring is planned in all areas of concern.
- Input from the Protected Species Division indicated that no effect to protected or endangered species would be expected from project activities. Ships laying marine cable operate at very slow speeds of 1–2 knots during cable burial operations and up to seven knots in very deep water where cable is laid on the ocean floor (beyond the continental shelf).

ACS Legal/Risk Management 600 Telephone Avenue, MS8 Anchorage, Alaska 99503 tel 907.564.1340 fax 907.564.1329

- If possible, ACS will provide the positions and depths of any hard coral (*Primnoa*) concentrations encountered. These corals concentrate in "thickets" and are often oriented with local currents on harder substrates 200–400m deep.
- For nautical chart updates, ACS will provide post construction waypoints of as-built cable routes to LCDR David Zezula of the Office of Coast Survey.
- ACS has notified the North Pacific Fisheries Management Council (Council) about the project. Information related to the project description and timing will be available at upcoming Council meetings. Cook Inlet fishermen are also being informed of the project.

In addition to the discussions with NOAA Fisheries Service, ACS has submitted permit applications to the Alaska Department of Natural Resources (ADNR) Division of Coastal and Ocean Management (DCOM) for coastal consistency review. On January 11, 2008, DCOM hosted a meeting with all interested agencies. Other permitting activities include applications to, or contact with, the U.S. Army Corps of Engineers, Kenai office, for a Nationwide Permit (NWP-12), the U.S. Fish and Wildlife Service, the ADNR Division of Mining, Lands and Water for a submerged lands easement, the Kachemak Bay Wildlife Refuge, the Alaska Department of Fish and Game for a Special Area Permit Application for activity within the Anchorage Coastal Wildlife Refuge, the State Historical Preservation Officer for Section 106 of the National Historic Preservation Act consultation, the ADNR Division of Parks and Outdoor Recreation, and pipeline owners for undersea and terrestrial pipeline crossings.

Project Description

The proposed submarine cable system will provide a dramatic increase in the available communications system capacity between Alaska and the continental United States and will ensure sufficient bandwidth to residents and businesses in Alaska well into the future. The proposed submarine cable will begin in Florence, Oregon, and will then be routed to Homer, Alaska with a branching unit (for future expansion) in the Gulf of Alaska. A terrestrial cable will be routed from the Homer beach manhole to a proposed terminal station in Homer and then to the existing North Kenai ACS facility and to the Nikiski beach manhole. The terrestrial routes will use existing ACS facilities, where possible, as well as new construction consisting of aerial cable on existing poles and buried cable in existing rights-of-way. Sections of the terrestrial cable that will be new builds include those from Homer to Ninilchik and from North Kenai to Nikiski. The terrestrial cable will be located primarily within Alaska Department of Transportation and Public Facilities (ADOT&PF) and Kenai Peninsula Borough road rights-of-way. A submarine cable will be routed from Nikiski to Point Woronzof in Anchorage. A terrestrial cable will be routed overland on an easement across Municipality of Anchorage, Heritage Land Bank property to the Ted Stevens International Airport, on a utility right-of-way within the boundaries of the airport, and along Anchorage municipal roads to an existing ACS facility.

Schedule

Permitting activities began in October 2007 with the application for a Federal Communications Commission license, which was granted on January 7, 2008. The intent of current permitting activities is to gain approval for an anticipated start of terrestrial construction in Alaska in late March or early April 2008. The planned construction will minimize and avoid effects to wildlife and habitat. It is anticipated that terrestrial construction in Alaska will be completed by late August 2008. Marine

portions of the cable will be installed during a June to September 2008 timeframe. The target service date is December 31, 2008.

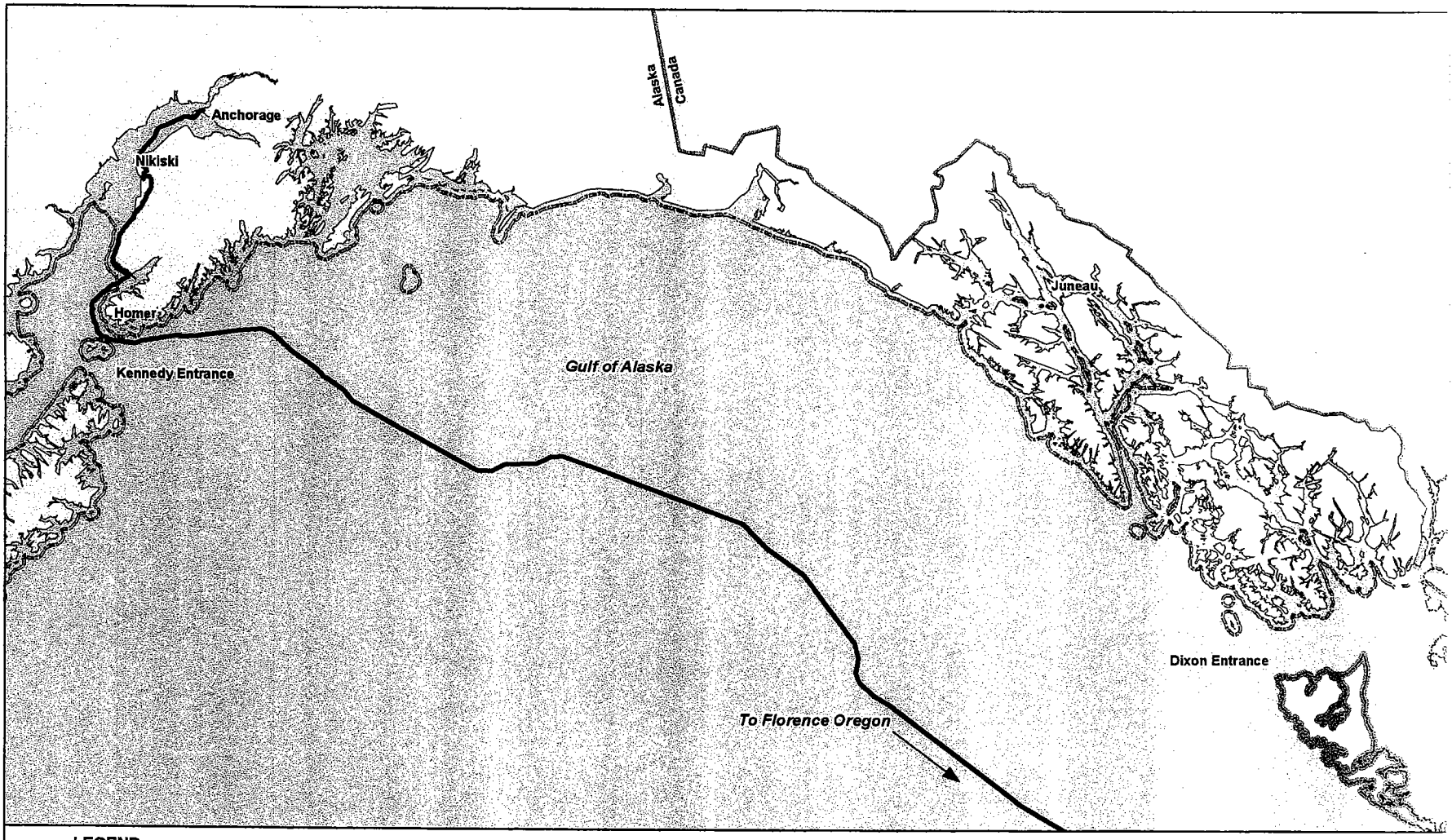
We look forward to receiving your comments with regard to this project. If you have questions, please contact Marko Radonich at (907) 646-0332 (marko.radonich@ch2m.com) or me at (907) 564-1244 (Steve.Gebert@acsalaska.com).

Sincerely,

Stephen E. Gebert
Director, Program Management Office
Alaska Communications Systems

Attachments: Marine Route in Alaska

cc: Tom Atkinson, ADNR/DCOM
Marko Radonich, CH2M HILL
Sherrie Greenshields, New Horizons Telecom, Inc. (NHTI)


Alaska
Canada
Anchorage
Nikiski
Homer
Kennedy Entrance
Gulf of Alaska
Juneau
Dixon Entrance
To Florence Oregon
LEGEND
3 Mile Limit
Terrestrial Route
Marine Section
N
0
300,000
Feet
1 inch equals 300,000 Feet
(approximate)
ACS Fiber Optic Cable Project
Marine Route in Alaska
CH2MHILL