



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

Amanda Goebel Pereira, AICP  
NEPA Coordinator  
First Responder Network Authority  
U.S. Department of Commerce  
12201 Sunrise Valley Drive M/S 243  
Reston, VA 20192

Subject: Draft Programmatic Environmental Impact Statement on the Nationwide Public Safety  
Broadband Network for the Eastern United States, CEQ # 20160095

Dear Ms. Pereira:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) has completed its review of the First Responder Network Authority (FirstNet), an independent authority in the U.S. Department of Commerce, draft Programmatic Environmental Impact Statement (PEIS). The draft PEIS analyzes the impacts of the construction and operation of a nationwide public safety broadband network (NPSBN) in the eastern United States.

The NPSBN will address a critical national infrastructure need for a nationwide network to allow law enforcement personnel, fire fighters, emergency medical service professionals, and other public safety entities to communicate across agencies and jurisdictions. The draft PEIS is the second in a series that covers five geographic regions across the U.S. This draft PEIS covers the eastern United States and includes the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, and West Virginia as well as the District of Columbia.

The draft PEIS analyzed three alternatives: 1) Mixed Technologies, 2) Deployable Technologies Only, and 3) No Action. FirstNet selected the Mixed Technologies as the Preferred Alternative. Under the Preferred Alternative, FirstNet would construct a nationwide broadband Long Term Evolution network using a combination of wired, wireless, deployable, and satellite technologies. This may include, but is not limited to: collocation of network equipment and new infrastructure.

Based on our review, EPA rates the Mixed Technologies Alternative an **LO**. The "LO" rating signifies that the draft PEIS review did not identify any potential environmental impacts requiring substantive changes to the Preferred Alternative. The EPA Rating System Criteria is located at <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

One comment of note, on Page 57, under ES-5.14 Climate Change, the PEIS states “GHG emissions would be emitted locally but likely have a minimal effect globally.” We recommend removing this statement as it is not an appropriate method for characterizing the potential impacts associated with a proposed action and its alternatives and mitigation. The statement does not indicate anything beyond the nature of the climate change challenge itself: that diverse individual sources of emissions each may make a relatively small addition to global atmospheric GHG concentrations that collectively have a large impact.

We appreciate the opportunity to review the draft PEIS and look forward to reviewing the final PEIS. The staff contact for the review is Arthur Totten and he can be reached at (202) 564-7164.

Attachment

Sincerely,

A handwritten signature in blue ink, appearing to read "Shari Wilson".

Shari Wilson  
Acting Director  
Office of Federal Activities

**Title: Nationwide Public Safety Broadband Network for the Eastern U.S.**

Draft Programmatic EIS (PEIS) CEQ # 20160095

**Due:** 07/06/2016

**Project Summary:** First Responder Network Authority (FirstNet), an independent authority in the U.S. Department of Commerce (DOC) proposes to construct a nationwide public safety broadband Long Term Evolution (LTE) network using a combination of wired, wireless, deployable and satellite technologies. This will address existing deficiencies in public safety, communications interoperability, durability and resiliency.

The PEIS is the second in a series that covers five geographic regions across the U.S. This PEIS covers the eastern U.S. and includes the states of Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia and West Virginia. Cooperating Agencies with DOC on the PEIS are FCC, GSA, USDA, DOD, DOE and DHS.

**Climate Change:** No language changes to the CC/GHG analysis is proposed. The climate change and GHG analysis was very thorough and in accordance with current CEQ guidance. All project alternatives were analyzed in each individual geographic location. DOC will require FirstNet to implement Best Management Practices and mitigation measures that provide for adaptation to climate change effects. These efforts will both minimize GHG emissions and reduce the effects of climate change on the Proposed Action.