

ConnectMT BEAD Program

Environmental and Historic Preservation (EHP) Guide



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1. INTRODUCTION

As documented in the “General Terms and Conditions” for the Broadband Equity, Access, and Deployment (BEAD) Program, subgrantees are responsible for complying with all applicable Environmental and Historic Preservation (EHP) requirements as a condition of their BEAD awards before any grant-funded implementation activities can be initiated.¹ The National Telecommunications and Information Administration (NTIA) will require comprehensive subgrantee documentation to determine the appropriate level of National Environmental Protection Act (NEPA)² analysis required for each BEAD-funded project, and then to ensure the analysis and any required consultations are satisfactorily conducted.³

Subgrantees will need to provide detailed project descriptions that include deployment procedures, potential impacts associated with those deployment procedures, and the photos and maps required to evaluate whether a Categorical Exclusion (CE), Environmental Assessment (EA), or Environmental Impact Statement (EIS) is necessary to determine potential impacts in compliance with NEPA, National Historic Preservation Act (NHPA) Section 106, and other relevant federal, state, and local regulations.⁴ Additional subgrantee EHP milestone activities are illustrated in the figure below.

¹ “General Terms and Conditions for NTIA BEAD Program Funds,” NTIA, April 2024, https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf.

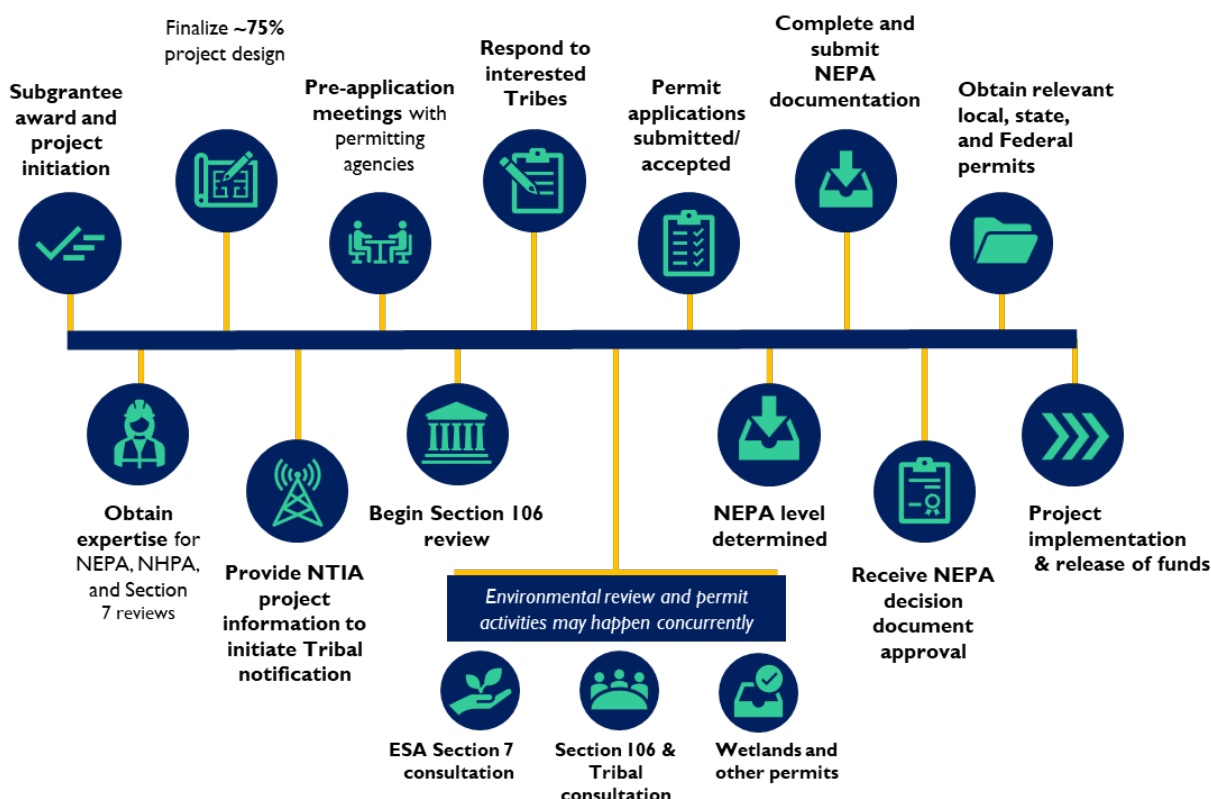
² “Guidance on NTIA National Environmental Policy Act Compliance,” NTIA, June 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-06/NTIA_NEPA_Procedures_June_2025.pdf.

³ “Streamlined Environmental Review & Permitting for Broadband: A Roadmap,” NTIA, November 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-11/NTIA_Streamlining_Environmental_Review_and_Permitting.pdf.

⁴ “National Historic Preservation Act (NHPA) Consultation Process Fact Sheet,” NTIA, April 2024, https://broadbandusa.ntia.gov/sites/default/files/2025-08/EHP_NHPA_Sect_106_Consultation_Process_Fact_Sheet_2025.pdf.



Figure 1: Subgrantee Milestone Schedule Considerations (Source: NTIA)⁵



ConnectMT is the joint lead agency alongside NTIA with responsibility to meet NEPA obligations (including NHPA obligations) and to minimize potential NEPA delays in the state while implementing the BEAD Program.

Accordingly, as described in this work plan, ConnectMT will provide oversight and guidance to subgrantees to help them prepare for and achieve NEPA and NHPA compliance.⁶ Subgrantees are expected to initiate and maintain a proactive role in all EHP-related activities required for their projects. ConnectMT's primary role is to provide supervision and administration of grant awards; subgrantees should not expect ConnectMT to perform project-specific activities for subgrantees. Therefore, it is critical that subgrantees review and understand the EHP requirements of their BEAD awards.

The EHP process must be completed to ConnectMT's and NTIA's satisfaction prior to any deployment activities; therefore, subgrantees are strongly encouraged to retain the services of an experienced and appropriately credentialed firm with expertise in

⁵ "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, [https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA for BEAD Milestone Schedule NEPA Timeline.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA%20for%20BEAD%20Milestone%20Schedule%20NEPA%20Timeline.pdf).

⁶ "NEPA for BEAD: Smart Start Part II: How to Approach and Implement BEAD Subgrant Permitting Conditions," NTIA, November 2025, [https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA BEAD NEPA Smart Start II BEAD Subgrant Permitting Conditions.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA%20BEAD%20NEPA%20Smart%20Start%20II%20BEAD%20Subgrant%20Permitting%20Conditions.pdf).



environmental compliance and impact analysis, and in the planning, research, and review of historic properties and cultural resources.



2. NTIA'S EHP COMPLIANCE TOOLS

Both ConnectMT and subgrantees will utilize tools administered by NTIA throughout the EHP compliance process. Subgrantees and their EHP consultants should be familiar with these NTIA tools and procedures.

Subgrantee Tools: As a first step toward understanding the BEAD Program's Environmental, Historic Preservation, and Permitting requirements, subgrantees should review NTIA's ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package.⁷

NTIA created APPEIT to help subgrantees with permitting planning and environmental review preparation efforts. The tool includes access to multiple maps from publicly available sources, including federal review, permitting, and resource agencies. The tool can be used to assist with preliminary identification of areas that may require permits or planning. By considering NTIA best practices for mitigation in engineering and route designs, it can help subgrantees avoid potentially significant impacts to environmental resources subject to NEPA and other statutory requirements.

ConnectMT's Tools: ConnectMT will also use an NTIA compliance tool throughout these processes—the Environmental Screening and Permitting Tracking Tool (ESAPTT).⁸

NTIA developed ESAPTT to support paperless environmental reviews and expedite NEPA approvals for the BEAD Program. ESAPTT includes Environmental Screening questionnaires that assist in identifying projects that can be categorically excluded. In addition, ESAPTT includes Permitting Tracking dashboards to help validate, monitor, and manage resource and right-of-way permits and supports the escalation of permitting challenges to NTIA.⁹

ConnectMT will use the ESAPPT to screen projects for environmental effects; transmit and maintain NEPA documents; and track subgrantee permitting requirements and timelines to support NTIA review and approval of final NEPA decisions.

ConnectMT will use details that subgrantees submitted in their applications, including each project's broadband serviceable locations (BSL), preliminary route maps, and facility locations, to develop the state's ESAPPT submissions. ConnectMT will also require subgrantees to submit project details in the BEAD Subgrantee EHP Questionnaire (Appendix B).

⁷ ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package, <https://www.arcgis.com/home/item.html?id=37fa42c6313e4bdb9d8a9c05d2624891>.

⁸ "Environmental Screening and Permitting Tracking Tool (ESAPTT) Overview," NTIA, June 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-06/ESAPTT_Overview.pdf.

⁹ "Frequently Asked Questions (FAQ): NEPA for BEAD Version 2.0," NTIA, July 2025, https://broadbandusa.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf.



3. BEAD PROGRAM EHP COMPLIANCE REQUIREMENTS FOR SUBGRANTEES AND THE STATE

To meet its joint lead responsibilities, ConnectMT will conduct its BEAD EHP oversight and compliance responsibilities in a manner that will successfully implement the state's obligations while streamlining subgrantee activities. Subgrantees will be required to meet obligations (described below) in each of the four phases of this compliance roadmap:



3.1 Project Assessment Phase

During the project assessment phase, ConnectMT will evaluate each awarded project to understand the project's EHP requirements. ConnectMT will begin by analyzing the project plans and designs that subgrantees submitted during the BEAD application process to identify potential environmental and cultural resources impacts.

In this phase, subgrantees will be required to complete a BEAD Subgrantee EHP Questionnaire (see Appendix B), which ConnectMT will then analyze to determine the project's EHP evaluation risk factors (primarily time, cost, and complexity) and develop a roadmap to guide the project's EHP evaluation.

This effort will also enable ConnectMT to develop an inventory of environmental and permitting activities required for each project. ConnectMT will use the information in subsequent EHP compliance phases to guide subgrantees, monitor progress, and assist when necessary.

Subgrantee Requirements in This Phase

- Review NTIA's APPEIT Project Package to understand Environmental, Historic Preservation, and Permitting requirements.¹⁰
- Review the ESAPTT Environmental Screening Questionnaire requirements to identify and be prepared to provide the project details that ConnectMT will require for its ESAPPT submission.¹¹
- Complete the BEAD Subgrantee EHP Questionnaire (see Appendix B) for each project.

¹⁰ ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package, <https://www.arcgis.com/home/item.html?id=37fa42c6313e4bdb9d8a9c05d2624891>.

¹¹ "Appendix: ESAPTT Environmental Screening Questionnaire," NEPA for BEAD Frequently Asked Questions v2.0, NTIA, https://broadbandusa.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf.



- Note whether construction will take place on any federal lands or cross any federally managed waterways that will require consultation with federal agencies (e.g., Bureau of Land Management (BLM), Bureau of Reclamation (BOR), U.S. Army Corps of Engineers (USACE)); this strategic monitoring will determine whether the project will need to incorporate those requirements into the compliance process.
- Use the Questionnaire as a guide for EHP compliance planning; identify the EHP requirements specific to the project and identify issues to discuss with the EHP experts engaged in the Subgrant Pre-Implementation Phase (see below).
- Respond to ConnectMT's information requests as necessary.

The State's Activities in This Phase

- Assess the applicability of NTIA EHP guidance, including:
 - NEPA Categorical Exclusions.¹²
 - Advisory Council on Historic Preservation (ACHP) *Program Comment for Communications Projects on Federal Lands and Property (Synopsis of 2024 Update)*.¹³
 - Advisory Council on Historic Preservation (ACHP) *Program Comment for Federal Communications Projects*.¹⁴
- Evaluate federal and Tribal consultation and permitting requirements.
- Evaluate historic properties and SHPO requirements.
- Assess other risk factors impacting EHP and permitting.
- Evaluate subgrantees' proposed deployment methodologies.
- Use GIS to assess project areas for potential impacts to federal lands, Tribal lands, and known biological, historic, cultural, and other resources.
- Categorize potential EHP compliance risks for each awarded project based on complexity of consultations, known environmental and cultural resources, and other findings.
- Distribute the BEAD Subgrantee EHP Questionnaire (Appendix A) to subgrantees to gather required information.

¹² "Notice of Newly Established NEPA Categorical Exclusions," NTIA, April 2, 2024, https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Notice_of_Newly_Established_NEPA_Categorical_Exclusions.

¹³ "Program Comment for Communications Projects on Federal Lands and Property (Synopsis of 2024 Update)," Advisory Council on Historic Preservation, <https://www.achp.gov/digital-library-section-106-landing/program-comment-federal-communications-projects>.

¹⁴ "Program Comment for Federal Communications Projects," Advisory Council on Historic Preservation, https://broadbandusa.ntia.gov/technical-assistance/The_Advisory_Council_on_Historic_Preservation.



- Develop other subgrantee information requests, as needed.
- Prepare a roadmap for EHP analysis of each project.

3.2 Subgrant Pre-Implementation Phase: NEPA and NHPA

During the subgrant pre-implementation phase, prior to subgrantees engaging in any deployment activities, ConnectMT must ensure that potential NEPA and NHPA impacts of each subgrant are fully evaluated. In this phase, subgrantees are responsible for performing the evaluations.

Subgrantees are required to engage NEPA and cultural resource experts to perform evaluations, and the related costs are allowable under their subgrants. It is the state's responsibility to ensure the analysis and requisite consultations are performed according to applicable federal regulations and NTIA's guidance.

ConnectMT is also required to submit subgrantee analysis, consultation documents, and concurrences to NTIA for evaluation by NTIA's EHP experts, via ESAPTT. ConnectMT will follow NTIA's step-by-step guidance to prepare and submit information in the ESAPPT.

First, ConnectMT will coordinate with subgrantees to receive the requisite project maps, field work photos, and detailed project descriptions; ConnectMT will then review and upload these materials to the ESAPPT.¹⁵ NTIA will initiate the Tribal Notification process and provide ConnectMT with a list of federally recognized Tribes with interest in the project area. ConnectMT or its delegate will engage interested Tribes to identify potential impacts to areas of Tribal significance.

Next, ConnectMT will complete the Categorical Exclusion (CE) questionnaire in ESAPPT to evaluate the project's scope; identify potentially applicable CEs; select the CE(s) that apply; and confirm that the project qualifies. In addition, ConnectMT will complete the Extraordinary Circumstances (EC) questionnaire in ESAPPT to determine whether any environmentally sensitive resources (e.g., endangered species or historic properties) are present; upload documentation directly through ESAPTT; and indicate mitigation commitments to avoid potentially significant impacts.

To help facilitate timely clearance, ConnectMT will require the subgrantee provide a milestone schedule that identifies specific deadlines and describes how the subgrantee proposes to meet these timing requirements. This includes the completion of consultations, securing requisite permitting, the completion of NEPA and NHPA Section 106 reviews, and the submission of Environmental Assessments (EA) or Environmental Impact Statements (EIS).¹⁶

¹⁵ "Sample Project Descriptions and Maps for BEAD Environmental and Historic Preservation (EHP) Review," NTIA, January 2026, https://broadbandusa.ntia.gov/sites/default/files/2026-01/DOC_NTIA_Sample_ESAPTT_Project_Maps_and_Descriptions_01_26.pdf.

¹⁶ "Program Comment for Federal Communications Projects," Advisory Council on Historic Preservation, https://broadbandusa.ntia.gov/technical-assistance/The_Advisory_Council_on_Historic_Preservation.



ConnectMT will help subgrantees develop a detailed project description that includes all environmental aspects and expected impacts of the project, as well as photos and maps.

In addition, as described below, the subgrantee is responsible for submitting the following, as applicable (which ConnectMT will validate):

1. Ground-level and aerial photos of the proposed project area and project plan drawings;
2. Floodplain map from the Federal Emergency Management Agency (FEMA) Map Service Center with the project overlain to show if and where the project falls in the flood zone;
3. Wetlands map from the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory with the project overlain to show if the project will impact wetlands or waterways and including buffer zones;
4. Initial consultation with State Historic Preservation Officers (SHPO) or Tribal Historic Preservation Officers (THPO), including a listing of any historic or archaeological resources within the vicinity of the construction activities;
5. Initial consultation with the USFWS to determine whether there are threatened or endangered species or critical habitat in the vicinity of the project; and
6. Initial plans for assessment of potential climate risks impacting the proposed project, and mitigation actions (i.e., design changes, method of construction, or other) the subgrantee is considering.

Once NTIA approves the analysis and documentation for each project, it will make the final determination, in partnership with NIST which authorizes project deployment activities to commence. ConnectMT will synchronize environmental review and permitting processes to the extent practicable. For example, environmental reviews and permit activities may happen concurrently, while some federal land and resource management agencies (e.g., Bureau of Indian Affairs (BIA), Forest Service) may require the completion of NEPA before permits are issued.

The graphic below presents an overview of the levels of NEPA review required for the BEAD Program. As NTIA notes in its guidance, "NEPA establishes three levels of environmental review for potential projects: Categorical Exclusion (CATEX), Environmental Assessment (EA), and Environmental Impact Statement (EIS).^{*} The potential significance of impacts informs the level of review, and time and resource requirements vary for each."¹⁷ (The abbreviation "EE," for Eligible Entity, refers to ConnectMT as the BEAD Program grantee.)

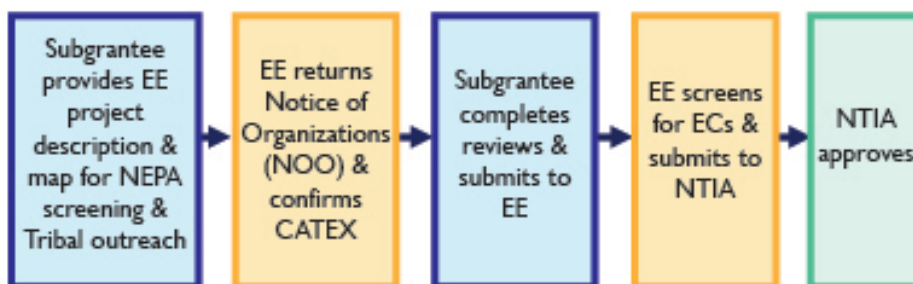
¹⁷ "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, [https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA for BEAD Milestone Schedule NEPA Timeline.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA%20for%20BEAD%20Milestone%20Schedule%20NEPA%20Timeline.pdf)



Figure 2: Levels of NEPA Review (Source: NTIA)¹⁸

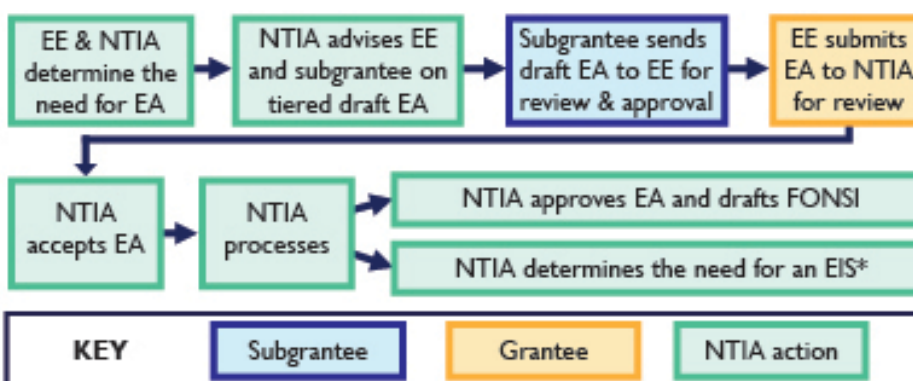
Categorical Exclusions

Application of a CATEX requires screening for Extraordinary Circumstances (EC) and takes approximately 3-6 months.



Environmental Assessments

An EA is a more comprehensive environmental review that takes approximately 6-12 months. An EA can "tier" off a programmatic NEPA document.



*Note: Broadband deployments do not typically trigger an EIS, which can take 12-24 months to complete.

Subgrantee Requirements in This Phase

- Engage NEPA experts to:
 - Perform NEPA analysis and fieldwork.
 - Support consultations.
 - Develop documentation in accordance with consultation requirements.
 - Submit and revise documentation as needed.
 - Support mitigation planning.
- Engage cultural resources experts to:
 - Engage in all consultations.
 - Perform analysis and fieldwork.

¹⁸ "NEPA for BEAD: Milestone Schedule & NEPA Timeline," NTIA, [https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA for BEAD Milestone Schedule NEPA Timeline.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA%20for%20BEAD%20Milestone%20Schedule%20NEPA%20Timeline.pdf)



- Develop documentation in accordance with consultation requirements.
- Submit and revise documentation, as needed.
- Support mitigation planning.
- Submit all data required to enable ConnectMT to complete the Environmental Screening Questionnaire requirements in the ESAPTT, including:
 - Detailed project description.
 - Route maps.
 - Deployment methodology.
 - Photos of field work.
- Assess the completed BEAD Subgrantee EHP Questionnaire (Appendix B) and other research to identify any extraordinary circumstances that could preclude a Categorical Exclusion and trigger additional NEPA requirements.
 - Verify whether the proposed action will occur within an environmentally sensitive or unique geographic area. If applicable, provide a map and supporting details to explain the relationship to the project.
 - Submit the U.S. Fish & Wildlife Services (USFWS) Information for Planning and Consultation (IPaC)¹⁹ and Section 7 Consultation Information and/or Essential Fish Habitat (EFH) Assessment Report and National Marine Fisheries Services (NMFS) EFH data to verify whether the proposed action will adversely impact Endangered or Threatened Species or have an adverse effect on Designated Critical Habitats.²⁰ If applicable, submit supporting documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.
 - Verify whether the proposed action will adversely impact protected migratory birds or their habitats through coordination with the USFWS Migratory Bird Program.²¹ If applicable, submit supporting documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.
 - Verify whether the proposed action will adversely affect historic, archeological, or cultural sites, including Native American Traditional Properties and properties listed or eligible for listing on the National Register of Historic Places.²² Confirm whether a Program Comment for Federal Communications

¹⁹ "Information for Planning and Consultation (IPaC)," U.S. Fish & Wildlife Service, <https://ipac.ecosphere.fws.gov/>.

²⁰ "EFH Mapper," NOAA Fisheries, <https://www.habitat.noaa.gov/apps/efhmapper/>.

²¹ "Migratory Birds," U.S. Fish & Wildlife Service, <https://www.fws.gov/program/migratory-birds>.

²² National Register of Historic Places," U.S. National Park Service, <https://www.nps.gov/subjects/nationalregister/index.htm>.



Project,²³ Duplicative Wireless Review Program Comment for towers,²⁴ or Programmatic Agreement or Memorandum of Agreement was executed. Provide Section 106 documentation and a State Historic Preservation Office (SHPO) concurrence letter. If applicable, submit supporting documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.

- o Verify whether the proposed action will restrict access to and ceremonial use of Indian Sacred Sites or adversely affect the physical integrity of Sacred Sites. If applicable, provide any relevant documentation or additional explanation.
- o Verify whether the proposed action will occur within or involve significant changes to a floodplain;²⁵ involve significant changes or effects on waterbodies or wetlands (including submarine or underwater cable);²⁶ or involve significant changes or effects on water quality, sole source aquifers, or public water supplies.²⁷ If applicable, submit supporting maps and documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.
- o Verify whether the proposed action will have any connection to hazardous waste, including the non-permitted generation, transportation, treatment, storage, or disposal of substances hazardous to human health.²⁸ If applicable, provide relevant documentation, maps of known soil/water contamination, and/or relevant plans.
- o Verify whether human exposure to ionizing or non-ionizing radiation in excess of Federal Communications Commission (FCC) standards may occur.²⁹ If applicable, provide relevant documentation, including equipment specification sheets.
- o Verify whether the proposed action is controversial due to unproven technology, uncertain or unique environmental effects, disagreement about the size, nature, or effect on the environment. If applicable, provide any relevant documentation or additional explanation.

²³ "Program Comment for Federal Communications Projects," Advisory Council on Historic Preservation, https://broadbandusa.ntia.gov/technical-assistance/The_Advisory_Council_on_Historic_Preservation.

²⁴ "Program Comment to Avoid Duplicative Reviews for Wireless Communications Facilities Construction and Modification," Advisory Council on Historic Preservation, July 31, 2020, <https://www.achp.gov/digital-library-section-106-landing/program-comment-avoid-duplicative-reviews-wireless>.

²⁵ "FEMA Flood Map Service Center," FEMA, <https://msc.fema.gov/portal/home>.

²⁶ "National Wetlands Inventory," U.S. Fish & Wildlife Service, <https://www.fws.gov/program/national-wetlands-inventory>.

²⁷ "Drinking Water Regulations," U.S. EPA, <https://www.epa.gov/dwreginfo/drinking-water-regulations>.

²⁸ "Links to Hazardous Waste Programs and U.S. State Environmental Agencies," U.S. EPA, <https://www.epa.gov/hwgenerators/links-hazardous-waste-programs-and-us-state-environmental-agencies>.

²⁹ "Radio Frequency Safety," Federal Communications Commission, <https://www.fcc.gov/general/radio-frequency-safety-0>.



- **Verify whether the proposed action may violate a Federal, Tribal, State, or local law, regulation, policy, or requirement imposed for the protection of the environment. If applicable, provide any relevant documentation or additional information.**

The State's Activities in This Phase

- **NEPA activities:**
 - **Coordinate with NTIA to determine the appropriate level of NEPA analysis for each project and oversee the analysis.**
 - **Consult with state departments (e.g., Environmental Quality) on any state regulations or environmental restrictions in the project area.**
 - **Coordinate with NTIA to determine the required NEPA consultations for each project and oversee the consultations.**
 - **NTIA must review and approve the level of NEPA analysis, sufficiency, documentation, and outcome – such as a “no effect” determination or other appropriate go-forward decision (with mitigation, if applicable).**
 - **NTIA and the National Institute of Standards and Technology (NIST) must address existing, new, or modified specific award conditions (SACs).**
 - **As applicable, review subgrantee submitted data to validate whether any extraordinary circumstances could preclude the application of a Categorical Exclusion and trigger additional NEPA requirements.**
 - **Identify any biological or environmental resources near proposed deployment areas.**
 - **Finalize the NEPA roadmap for the project.³⁰**
 - **Gain NTIA concurrence with the NEPA roadmap.**
 - **Oversee analysis and deliver guidance/technical assistance to subgrantees.**
- **NHPA activities:**
 - **Coordinate with NTIA to determine the appropriate level of NHPA and cultural resources analysis and oversee the analysis.**

³⁰ Note that the roadmap may change based on information gathered during the analysis itself. For example, should the consultation with the U.S. Fish & Wildlife Service (USFWS) determine that specific investigation is required to assess potential impacts to a migratory endangered species, those USFWS requirements would be added to the scope of the analysis.



- **Coordinate with NTIA to determine the required NHPA and cultural resources consultations and oversee the consultations.**
 - **Identify known historic and cultural resources near proposed deployment areas.**
- **Evaluate the applicability of updated Program comments.**
- **Finalize the NHPA roadmap for the project, including necessary consultations.**
- **Gain NTIA concurrence with the NHPA roadmap.**
- **Oversee all consultations (SHPO, Tribal, federal).**
- **Oversee analysis and deliver guidance/technical assistance to subgrantees.**

3.3 Subgrant Implementation Phase

During the Subgrant Implementation Phase, ConnectMT will oversee subgrantee project deployment activities.

Subgrantee Requirements in This Phase

- **Implement awards in a manner compliant with all terms and conditions, including EHP requirements, SACs, and mitigation requirements.**
- **Provide regular reports and updates to ConnectMT and other stakeholders as required.**
- **Participate in site visits, desk reviews, and field inspections as required.**
- **Identify scope changes, route changes, or EHP issues and immediately alert ConnectMT.**
- **Provide documents, maps, field notes, or other materials upon request.**

The State's Activities in This Phase

- **Monitor ongoing NEPA/NHPA compliance, including any SACs and mitigation activities required as a result of EHP analysis.**
- **Identify and, in partnership with subgrantees and NTIA, address any changes to scope (including route deviations not previously analyzed).**
- **Conduct monitoring and oversight, including site visits and desk reviews; incorporate EHP oversight into other monitoring activities.**
- **Note any EHP mitigation requirements defined during the Pre-Implementation Phase, where applicable (e.g., Tribal monitors, seasonal deployment prohibitions) and monitor to ensure subgrantee compliance.**



- Analyze any changes to scope or route, per NTIA-approved procedures.³¹
- Oversee implementation and deliver guidance/technical assistance to subgrantees as needed.

3.4 Subgrant Close Out Phase

Project Close Out will be the final step in the grant lifecycle. As of this writing, NTIA has not issued any close out requirements specific to EHP. ConnectMT will closely track NTIA guidance on semi-annual and close out reporting requirements, as well as any future SACs placed on the award. ConnectMT will communicate with subgrantees about reporting or compliance activities required to close out the BEAD Program.

³¹ NTIA has not defined a formal route change procedure for BEAD. However, NTIA has implemented an expedited review process for project route changes under NTIA's Middle Mile Grant (MMG) Program, and a similar process likely will be established for BEAD.



APPENDIX A: BEAD EHP RESOURCES FOR SUBGRANTEES

BEAD-Specific NEPA/EHP Guidance

2024 BEAD Program General Terms and Conditions – Section 13 (EHP Review)

Defines binding NEPA/EHP requirements for BEAD, including joint lead agency roles and prohibition on construction before NEPA clearance.

https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf

NEPA for BEAD Frequently Asked Questions (v2.0)

Detailed FAQ covering NEPA applicability, staffing, Tribal engagement, timelines, and subgrantee document preparation.

https://broadbandusa.ntia.gov/sites/default/files/2025-07/NEPA_for_BEAD_FAQs_v2.pdf

Smart Start – How to Plan and Prepare for NEPA Compliance for BEAD

Early-stage planning guide for states on building NEPA capacity and integrating environmental review into BEAD timelines.

https://broadbandusa.ntia.gov/technical-assistance/Smart_Start_NEPA_Compliance_for_BEAD

Smart Start Part II – Implementing BEAD Subgrant Permitting Conditions

Provides model permitting SACs and guidance for embedding NEPA obligations into subgrant agreements.

https://broadbandusa.ntia.gov/technical-assistance/Smart_Start_II_BEAD_Subgrant_Permitting_Conditions and
https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_NEPA_Smart_Start_II_BEAD_Subgrant_Permitting_Conditions.pdf

ESAPTT Overview

Explains NTIA's environmental screening and permitting tracking tool for BEAD NEPA workflow.

https://broadbandusa.ntia.gov/technical-assistance/ESAPTT_Overview

ESAPTT External User Guide

Step-by-step instructions for using ESAPTT, including NEPA project setup, screening, and decision documentation.

https://broadbandusa.ntia.gov/technical-assistance/NTIA_ESAPTT_User_Guide

Dividing BEAD Subgrant Awards into Multiple ESAPTT NEPA Project Areas

Guidance on when and how to split a BEAD subgrant into multiple NEPA project areas.

https://broadbandusa.ntia.gov/technical-assistance/NEPA_Project_Areas_CSV_Instruction_Guide

BEAD Guidance on NEPA and NHPA for LEO Satellite Service

Defines how NEPA/NHPA apply to LEO satellite solutions in BEAD projects.

https://broadbandusa.ntia.gov/sites/default/files/2025-10/NTIA_BEAD_LEO_Guidance_Oct_2025.pdf



Streamlined Environmental Review & Permitting for Broadband: A Roadmap
High-level roadmap for environmental review efficiency and permitting strategies.

https://broadbandusa.ntia.gov/sites/default/files/2025-11/NTIA_Streamlining_Environmental_Review_and_Permitting.pdf

NEPA for BEAD: Milestone Schedule & NEPA Timeline

Outlines expected NEPA workflow and milestone timing relative to BEAD implementation.

[https://broadbandusa.ntia.gov/technical-assistance/NEPA for BEAD Milestones Schedule and Timeline Guidance](https://broadbandusa.ntia.gov/technical-assistance/NEPA%20for%20BEAD%20Milestones%20Schedule%20and%20Timeline%20Guidance) and [https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA for BEAD Milestone Schedule NEPA Timeline.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-05/NEPA%20for%20BEAD%20Milestone%20Schedule%20NEPA%20Timeline.pdf)

Permitting Roundtables: An Overview

NTIA's plan for roundtables to support permitting coordination with states and federal partners.

[https://broadbandusa.ntia.gov/technical-assistance/EHP Permitting Roundtables Interagency Collaboration Update](https://broadbandusa.ntia.gov/technical-assistance/EHP%20Permitting%20Roundtables%20Interagency%20Collaboration%20Update)

Programmatic Environmental Impact Statement (PEIS) Evaluation Sample Memo

Sample memo demonstrating use of FirstNet PEIS for tiered reviews under BEAD.

[https://broadbandusa.ntia.gov/technical-assistance/Programmatic Environmental Impact Statement Evaluation Sample Memo and Recommendations](https://broadbandusa.ntia.gov/technical-assistance/Programmatic%20Environmental%20Impact%20Statement%20Evaluation%20Sample%20Memo%20and%20Recommendations)

Evaluating FirstNet PEIS Sections for States/Territories

Guidance on applying FirstNet PEIS content for BEAD tiered reviews.

[https://broadbandusa.ntia.gov/technical-assistance/DOC NTIA BEAD Evaluating FirstNet PEIS](https://broadbandusa.ntia.gov/technical-assistance/DOC%20NTIA%20BEAD%20Evaluating%20FirstNet%20PEIS)

ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) Project Package

APPEIT tool for use by subgrantees.

<https://nbam.ntia.gov/content/37fa42c6313e4bdb9d8a9c05d2624891/about>

Sample Project Descriptions and Maps for BEAD Environmental and Historic Preservation (EHP) Review

Guidance on submitting ESAPPT Grants Project Records.

[https://broadbandusa.ntia.gov/sites/default/files/2026-01/DOC NTIA Sample ESAPTT Project Maps and Descriptions 01_26.pdf](https://broadbandusa.ntia.gov/sites/default/files/2026-01/DOC%20NTIA%20Sample%20ESAPTT%20Project%20Maps%20and%20Descriptions%2001_26.pdf)

Cross-Program NEPA / EHP Guidance Used in BEAD

NTIA NEPA Compliance Guidance (2025)

NEPA compliance manual for all NTIA programs, including BEAD.

[https://broadbandusa.ntia.gov/technical-assistance/Guidance on NTIA NEPA Compliance](https://broadbandusa.ntia.gov/technical-assistance/Guidance%20on%20NTIA%20NEPA%20Compliance)

Tiered EA Template & Guidance

Provides detailed instructions for preparing tiered EAs referencing FirstNet PEIS.

<https://broadbandusa.ntia.gov/nepa-resources-general-nepa-guidance-and-tools>



Environmental & Historic Preservation Fact Sheet (2022)

High-level overview of NEPA, NHPA, and EHP obligations for broadband programs including BEAD.

https://broadbandusa.ntia.gov/technical-assistance/EHP_Fact_Sheet_2022

NHPA Section 106 Consultation Process Fact Sheet

Outlines Section 106 consultation workflow for BEAD and other broadband deployments.

https://broadbandusa.ntia.gov/technical-assistance/NHPA_Consultation_Process_Fact_Sheet

Guide to Streamlined ESA Compliance

Instructions for ESA Section 7 review for broadband projects.

<https://broadbandusa.ntia.gov/nepa-resources-general-nepa-guidance-and-tools>

USFWS Section 7 “No Effect” List and Consultation Memo

Lists project types typically considered “no effect” for ESA purposes.

https://broadbandusa.ntia.gov/sites/default/files/2025-08/NTIA_FWS_Non-Federal_Designation_Memo_2025.pdf

NEPA/EHP Compliance Webinar Deck

Training slide deck covering NEPA, NHPA, ESA, and related requirements.

https://broadbandusa.ntia.gov/sites/default/files/2024-04/NEPA_EHP_Webinar_Deck.pdf

NEPA Resources – General NEPA Guidance & Tools (Landing Page)

Aggregated NTIA NEPA tools used by BEAD implementers.

<https://broadbandusa.ntia.gov/nepa-resources-general-nepa-guidance-and-tools>

Notice of Newly Established NEPA Categorical Exclusions (2024)

Categorical exclusions (CEs) established by the First Responder Network Authority (FirstNet Authority), an independent authority within NTIA, that cover categories of actions under the National Environmental Policy Act (NEPA) that NTIA proposes to take, applicable to IJA programs, including TBCP and BEAD.

https://broadbandusa.ntia.gov/funding-programs/policies-waivers/Notice_of_Newly_Established_NEPA_Categorical_Exclusions

ACHP Program Comment for Communications Projects on Federal Lands and Property (Synopsis of 2024 Update)

Synopsis of Advisory Council on Historic Preservation (ACHP) comments to guide and accelerate the review of broadband deployment and other communications projects on federal lands under NHPA Section 106.

<https://www.achp.gov/digital-library-section-106-landing/program-comment-federal-communications-projects>

ACHP Program Comment for Federal Communications Projects

Advisory Council on Historic Preservation (ACHP) Program Comment Form, instructions, and FAQs to guide and accelerate the review of broadband deployment and other federal communications projects under NHPA Section 106.



[https://broadbandusa.ntia.gov/technical-assistance/The Advisory Council on Historic Preservation](https://broadbandusa.ntia.gov/technical-assistance/The_Advisory_Council_on_Historic_Preservation)

General BEAD Program Resources

BEAD NOFO

Notice of Funding Opportunity for BEAD Program.

[https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD NOFO.pdf](https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD_NOFO.pdf)

BEAD Restructuring Policy Notice

NTIA's new rules and requirements issued June 6, 2025.

<https://www.ntia.gov/other-publication/2025/bead-restructuring-policy-notice>



APPENDIX B: BEAD SUBGRANTEE EHP QUESTIONNAIRE

This questionnaire is presented as a separate Excel file.