



Environmental and Historic Preservation (EHP) for Subgrantees

March 31, 2026

Agenda

1. **BEAD EHP Overview**
2. **NEPA Activities and Milestone**
3. **Q&A**



Introductions

Tim Moyer

- Principal Analyst, CTC Technology & Energy
- tmoyer@ctcnet.us





BEAD EHP Overview

EHP Overview

The **National Environmental Policy Act (NEPA)** and **National Historic Preservation Act (NHPA)** establish **requirements for environmental and cultural resources review.**

1

NEPA and NHPA require federal agencies to “stop, look, and listen” before making decisions that impact historic properties and the human environment

2

NEPA and NHPA review, including consultation with regulatory agencies, must be completed before an awarded project can begin deployment

* BEAD requirements include NEPA, Section 106 of NHPA, Section 7 of the Endangered Species Act, and Section 404 of the Clean Water Act.



EHP Key Takeaways for BEAD

NEPA and NHPA are procedural laws that require federal agencies to **evaluate projects prior to funding** deployment activities.

EHP review—including consultations with federal agencies, state agencies, and Tribes—must be **completed before** an awarded project can perform **ground disturbing work**.

- Reasonable engineering, permitting, and materials acquisition may occur in parallel.

NTIA requires Specific Award Conditions (SACs) between states and subgrantees to enforce EHP requirements.

- SACs may be lifted (to permit deployment) or added/modified (to enforce required mitigation measures or protections), depending on the findings associated with each project.



EHP Process

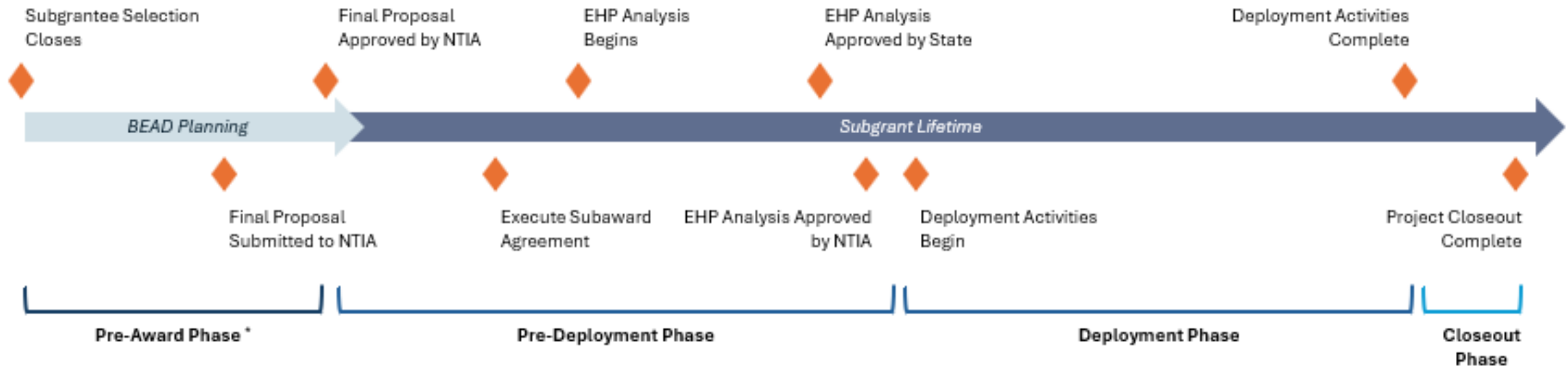
Subgrantees are responsible for complying with all **EHP requirements** as a condition of their BEAD awards **before** any grant-funded **ground disturbing work** can be initiated.

- **Subgrantees** are expected to play a proactive **role in all EHP-related activities** required for their projects.
- **ConnectMT's role** is to supervise and administer grant awards, providing oversight and guidance to subgrantees to **help** them prepare for and **achieve NEPA and NHPA compliance**.
- **NTIA will require** comprehensive **subgrantee documentation** to determine the **appropriate level of NEPA analysis** required for each BEAD-funded project.
- **Subgrantees** will need to **provide detailed project descriptions that** include:
 - Deployment procedures.
 - Potential impacts associated with those deployment procedures.
 - Photos and maps required to evaluate whether a Categorical Exclusion (CATEX), Environmental Assessment (EA), or Environmental Impact Statement (EIS) is necessary to determine potential impacts in compliance with NEPA, NHPA Section 106, and other relevant federal, state, and local regulations.

Subgrantees should note that these guidelines are not binding, exhaustive, or final, and they may be updated by ConnectMT at any time, as guidance is updated.



EHP Roadmap



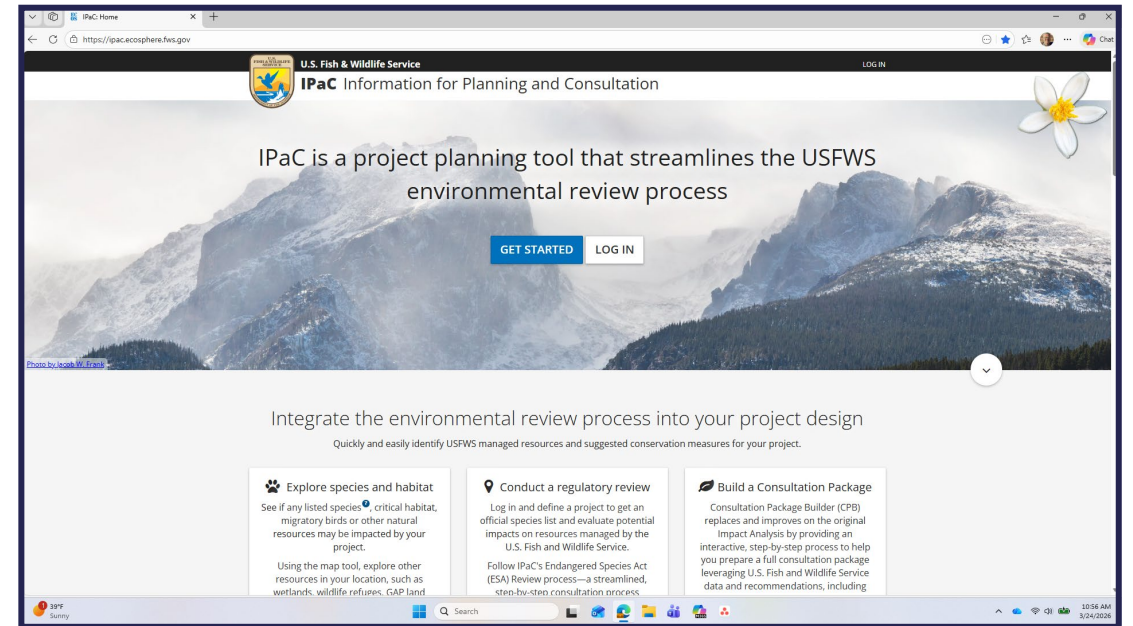
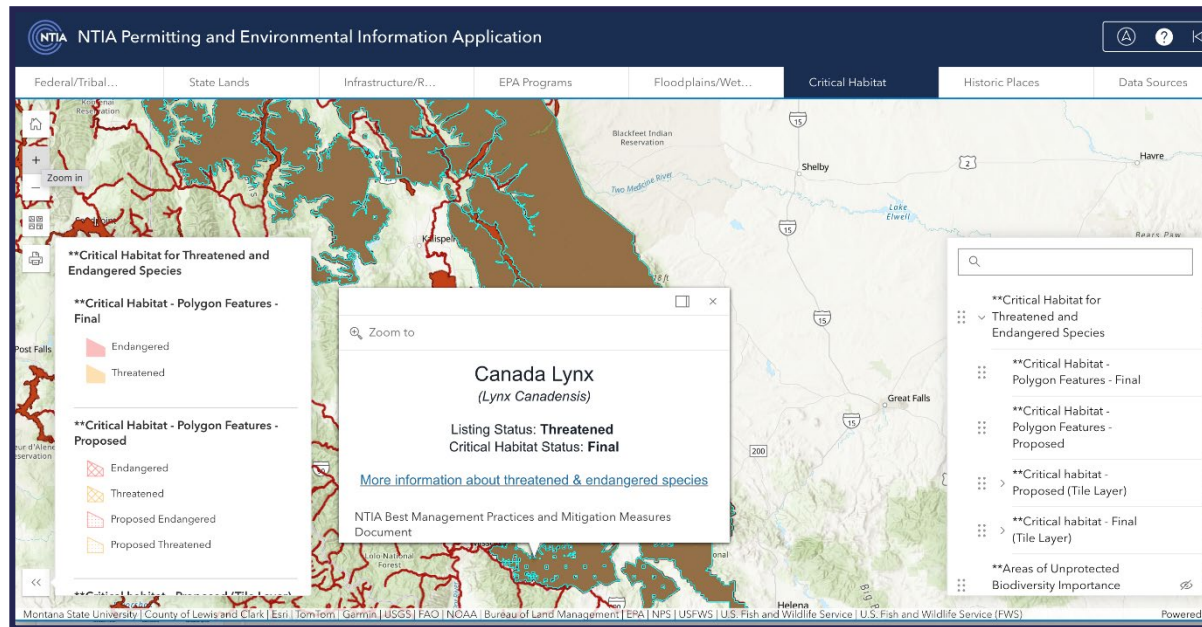
* Final Proposal inputs do not require evaluation of individual projects. Subsequent phases are specific to each NTIA-authorized subgrant.

** EHP is implemented based on the “federal action” that funds deployment activities. If instead, for example, a state made a single award to a subgrantee for a dozen project areas, those project areas would be “Connected Actions.” Deployment could not start in any area until the EHP review for all dozen project areas was complete. This could lead to delays in deployment where an EHP issue in one region could hold up progress in other parts of the state.



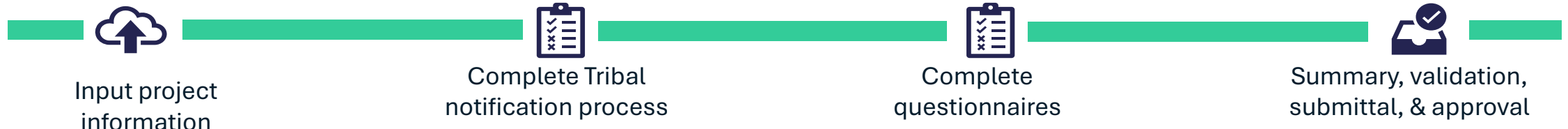
NTIA's Permitting Resources

NTIA has developed the **Environmental Screening and Permitting Tracking Tool (ESAPTT)** to support states in applying categorical exclusions, considering extraordinary circumstances, and generating NEPA decision documents for BEAD.



NTIA's ESAPTT Screening Process

NEPA specialists within ConnectMT will perform NEPA screening and certify the sufficiency of subgrantee documentation through the ESAPTT tool



Environmental screening step-by-step

- 1 Input project information:** ConnectMT will upload a project map and project description to the tool
- 2 Complete Tribal notification process:** The NEPA specialist will receive a list of federally recognized Tribes with interest in the project area and follow up to determine potential impacts to historic properties of Tribal significance
- 3 Complete ESAPTT questionnaires**
 - Categorical Exclusion (CATEX) Questionnaire:** The NEPA specialist will answer questions on the project's scope to identify potentially applicable CATEXs, select the CATEX(s) that apply, and confirm that the project qualifies
 - Extraordinary Circumstances (EC) Questionnaire:** The NEPA specialist will identify if 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
- 4 Summary, validation, submittal, & approval:** The NEPA specialist will use their professional expertise to validate that the categorical exclusion should be applied and transmit the Draft NEPA Decision Memo to NTIA for review and approval within ESAPTT





NEPA Activities and Milestones

Pre-Deployment Assessment

NTIA requirements	State oversight activities	Subgrantee activities
<ul style="list-style-type: none">• Assess applicability of NTIA EHP guidance:<ul style="list-style-type: none">• NEPA Categorical Exclusions• Advisory Council on Historic Preservation (ACHP) Program Comment for Communications Projects on Federal Lands and Property (2024 Update)• Evaluate known biological resources• Evaluate known historic properties and State Historic Preservation Office (SHPO) requirements• Evaluate known federal and Tribal consultation and permitting requirements• Assess other risk factors impacting EHP and permitting	<ul style="list-style-type: none">• Evaluate subgrantee deployment methodologies• Utilize GIS to assess project areas for potential impacts to federal lands, Tribal lands, and known biological, historic, cultural, and other resources• Categorize EHP risk based on complexity of consultations, known environmental and cultural resources, and other findings• Develop a roadmap for EHP analysis of each project	<ul style="list-style-type: none">• Respond to EHP questionnaire to gather additional data needed for analysis (if needed)• Respond to other information requests necessary to tune assessment and roadmap (if needed)



Pre-Deployment (NEPA)

NTIA requirements	State oversight activities	Subgrantee activities
<ul style="list-style-type: none">• Determine appropriate level of analysis; conduct the analysis• Determine required consultations; conduct the consultations• Review and approve level of analysis, sufficiency, documentation, and outcome— such as a “no effect” determination or other appropriate go-forward decision (with mitigation, if applicable)• [NTIA and NIST must] Address existing, new, or modified SACs	<ul style="list-style-type: none">• Identify any deployment deviations from CATEX that would require additional NEPA analysis• Identify any biological or environmental resources near proposed project areas• Finalize NEPA roadmap for the project• Obtain NTIA concurrence with NEPA roadmap• Oversee analysis and deliver guidance/technical assistance to subgrantees	<ul style="list-style-type: none">• Submit any requested data, including:<ul style="list-style-type: none">• Detailed project description• Route maps• Deployment methodology• Photos or field work• Engage EHP experts to help:<ul style="list-style-type: none">• Perform NEPA analysis and fieldwork• Support consultations• Develop documentation in accordance with agreed upon roadmap• Submit and revise documentation as needed• Support mitigation planning



Pre-Deployment (NHPA)

NTIA requirements	State oversight activities	Subgrantee activities
<ul style="list-style-type: none">• Determine appropriate level of analysis; conduct the analysis• Determine required consultation; conduct the consultations• Confirm level of analysis, sufficiency of consultations, and associated documentation• Final determinations come from consulting partners—such as a “no effect” concurrence or other appropriate go-forward decision (with mitigation, if applicable)• Address existing, new, or modified SACs	<ul style="list-style-type: none">• Identify known historic and cultural resources near proposed deployment areas• Determine applicability of updated Program Comment• Finalize NHPA roadmap for the project, including necessary consultations• Obtain NTIA concurrence with NEPA roadmap• Conduct consultations (SHPO, Tribal, Federal)• Oversee analysis and deliver guidance/technical assistance to subgrantees	<ul style="list-style-type: none">• Submit any requested data, including:<ul style="list-style-type: none">• Detailed project description• Route maps• Deployment methodology• Photos or field work• Engage cultural resources experts to help:<ul style="list-style-type: none">• Engage in all consultations• Perform analysis and fieldwork• Develop documentation in accordance with agreed upon roadmap• Submit and revise documentation as needed• Support mitigation planning

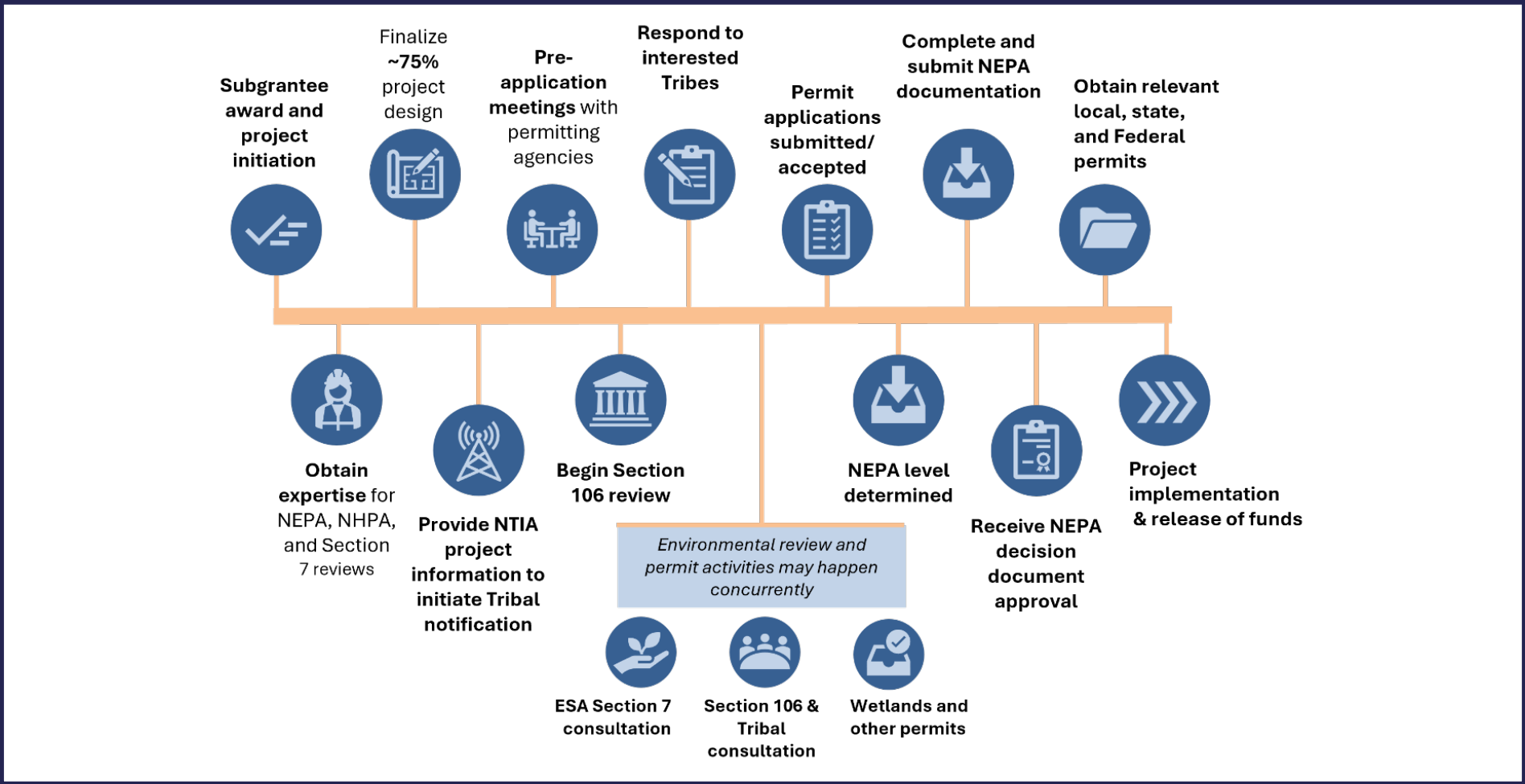


Deployment

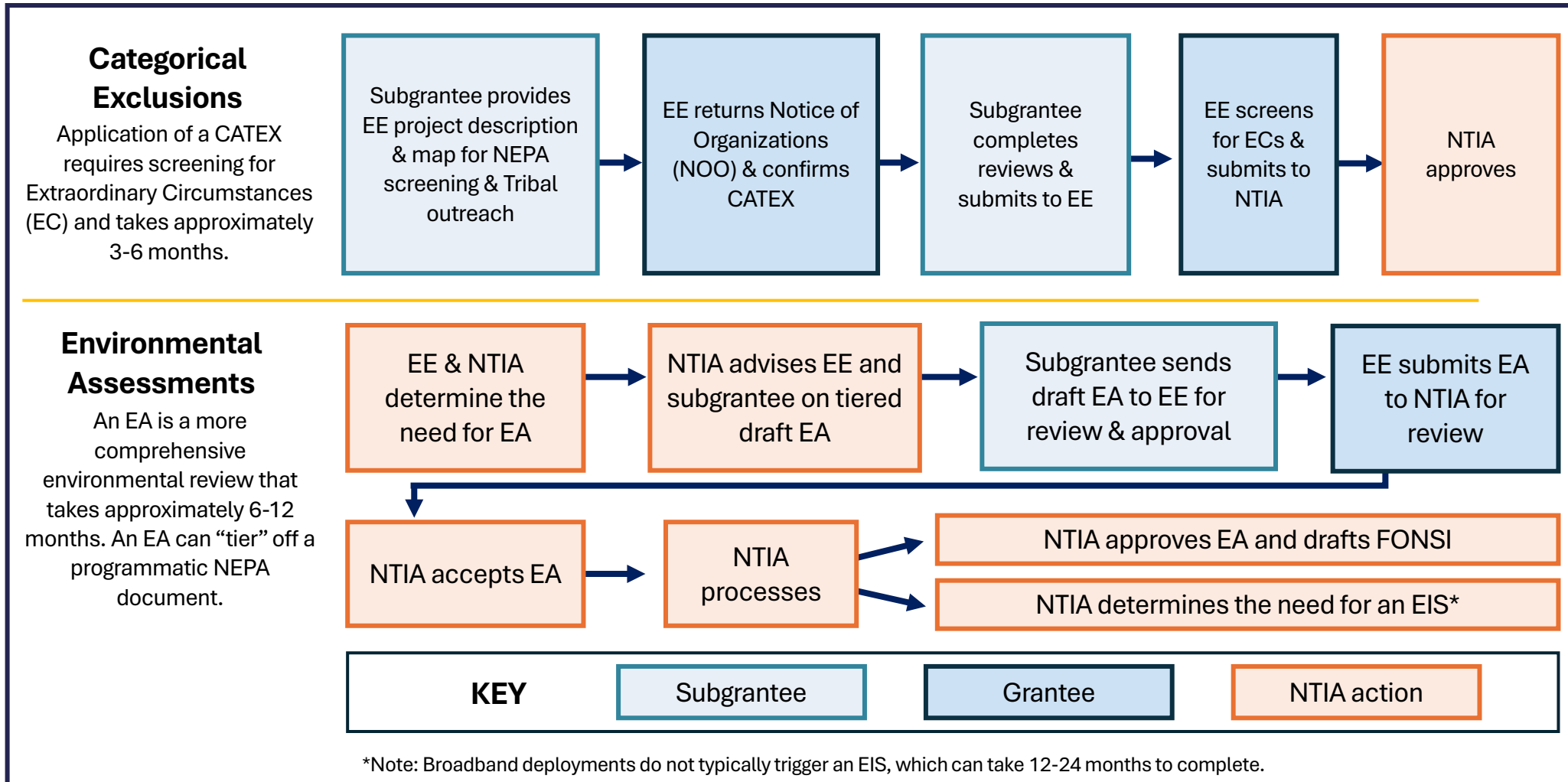
NTIA requirements	State oversight activities	Subgrantee activities
<ul style="list-style-type: none">• Monitor ongoing NEPA/NHPA compliance, including any SACs and mitigation activities required from EHP analysis• Identify and address any changes to scope (including route deviations not previously analyzed)	<ul style="list-style-type: none">• Conduct monitoring and oversight, including site visits; incorporate EHP into those tasks• Pay special attention to mitigation activities, if applicable (e.g., Tribal monitors, seasonal deployment prohibitions, etc.)• Analyze any changes to scope or route per NTIA-approved procedures• Oversee implementation and deliver guidance/technical assistance to subgrantees	<ul style="list-style-type: none">• Implement awards in a manner compliant with all terms and conditions, including EHP SACs and mitigating activities• Provide regular reports and updates• Identify scope changes, route changes, or EHP issues, and alert ConnectMT immediately• Provide any requested documents, maps, field notes, or other materials



Subgrantee Milestone Schedule Considerations



Levels of NEPA Review



Preparation & Best Practices

Subgrantees must **complete EHP evaluations** and receive **consent from NTIA** before beginning ground disturbing activities; this step unlocks access to deployment funds.

ConnectMT recommends that subgrantees procure **support** from a **firm that specializes in EHP** with expertise in their region.

Subgrantees must **leverage their EHP expertise** to complete and return the ConnectMT BEAD Subgrantee EHP Questionnaire.

Subgrantees should use the **ConnectMT EHP Guide** and **ConnectMT BEAD Subgrantee EHP Task List** to navigate EHP requirements.



Preparation & Best Practices

Subgrantees must follow **risk management practices** and should not proceed with any ground disturbing work in areas subject to additional EHP review to reduce the potential for costly re-work.

ConnectMT will **verify subgrantee compliance** through monitoring and oversight; **subgrantees** should be **transparent** and actively participate in that process.

- Note: Successful subgrantees will be required to certify their ongoing compliance with applicable EHP requirements.

ConnectMT must **monitor each project** to ensure that **deployment does not deviate** from the approved plan.

- Should deviations be proposed, ConnectMT must ensure they are fully evaluated for potential EHP impacts and pursue clearance with NTIA prior to the subgrantee undertaking ground disturbing activities.



Upcoming Technical Assistance

Technical Assistance Session Calendar

Topic	Date	Time*
Introduction to Euna Grants	April 2, 2026	1 PM
Submitting Quarterly Reports	April 28 and May 14, 2026	1 PM & 11 AM
Permitting Overview	June 3, 2026	1PM
Submitting Quarterly Reports Q&A	June 4 and June 11, 2026	1PM & 11 AM
Submitting Annual Reports	November 3 and November 5, 2026	1 PM & 11 AM

Where to find webinar links:

- All webinar dates, times, and links to register can be found at:
<https://connectmt.mt.gov/Events/Upcoming>
- All webinars are recorded and will be posted on the ConnectMT website.



*All times are MST

**Additional questions should be submitted to the Technical Assistance email at connectmt@mt.gov

Post Award Resources

Technical Assistance

connectmt@mt.gov

Kim Martinell – Broadband Program Supervisor

kim.martinell@mt.gov

406-444-3307

Moriah Keller – Broadband Program Coordinator

moriah.keller@mt.gov

406-444-4099

Maria Jackson – Grant Contracts Coordinator

maria.jackson2@mt.gov

406-444-1391





Questions