



## ENVIRONMENTAL AND HISTORIC PRESERVATION TASK LIST

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This document outlines the Environmental and Historic Preservation (EHP) requirements for ConnectMT BEAD subgrantees, organized by project phase.

### Project Assessment Phase

This phase focuses on identifying project-specific environmental and historic preservation (EHP) requirements, completing initial questionnaires, and preparing information needed to support compliance planning and future reviews. The following tasks for this phase include:

- Review NTIA's APPEIT Project Package to understand environmental, historic preservation, and permitting requirements.
- 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.
- Complete the BEAD Subgrantee EHP Questionnaire for each project.
  - 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 is a key gatekeeping exercise that 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.

### Subgrant Pre-Implementation Phase: NEPA and NHPA

This phase involves conducting required environmental and historic preservation analyses, engaging subject matter experts, completing consultations, and preparing and submitting all documentation necessary to meet NEPA and NHPA requirements.

#### Subgrantees should 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

**Subgrantees should engage cultural resource experts:**

- Engage in all consultations
- Perform analysis and fieldwork
- Develop documentation in accordance with consultation requirements
- Submit and revise documentation, as needed
- Support mitigation planning

**Subgrantees should develop a detailed project description that includes all environmental aspects and expected impacts of the project, as well as photos and maps. These items should include the following:**

- Ground-level and aerial photos of the proposed project area and project plan drawings;
- 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;
- 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;
- 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;
- Initial consultation with the USFWS to determine whether there are threatened or endangered species or critical habitat in the vicinity of the project; and
- 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.

**Subgrantees should submit all data required to enable ConnectMT to complete the Environmental Screening Questionnaire requirements in the ESAPTT, including:**

- Assess the completed BEAD Subgrantee EHP Questionnaire 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 yes, 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) 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.
  - If yes, 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.
  - If yes, 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. Confirm whether a Program Comment for Federal Communications Project, Duplicative Wireless Review Program Comment for towers, or Programmatic Agreement or Memorandum of Agreement was executed. Provide Section 106 documentation and a State Historic Preservation Office (SHPO) concurrence letter.
  - If yes, 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 restrict access to and ceremonial use of Indian sacred sites or adversely affect the physical integrity of sacred sites.
  - If yes, provide any relevant documentation or additional explanation.
- Verify whether the proposed action will occur within or involve significant changes to a floodplain; involve significant changes or effects on waterbodies or wetlands (including submarine or underwater cable); or involve significant changes or effects on water quality, sole source aquifers, or public water supplies.
  - If yes, submit supporting maps and documentation to detail the mitigation commitments that will be implemented to avoid, minimize, or mitigate potential environmental impacts.
- 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.

- If yes, provide relevant documentation, maps of known soil/water contamination, and/or relevant plans.
- Verify whether human exposure to ionizing or non-ionizing radiation in excess of Federal Communications Commission (FCC) standards may occur.
  - If yes, provide relevant documentation, including equipment specification sheets.
- 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 yes, provide any relevant documentation or additional explanation.
- 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 yes, provide any relevant documentation or additional information.

## Subgrant Implementation Phase

This phase centers on carrying out project activities in compliance with all approved EHP requirements, monitoring conditions, and mitigation measures, while providing ongoing reporting and coordination with ConnectMT.

- 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 requested or required by ConnectMT or a SAC.
- Participate in site visits, desk reviews, and field inspections upon request.
- Identify scope changes, route changes, or EHP issues and immediately alert ConnectMT.
- Provide documents, maps, field notes, or other materials upon request.

## Subgrant Closeout Phase

This phase addresses final compliance and reporting activities required to formally close out EHP requirements, in alignment with evolving NTIA guidance and ConnectMT direction. As of this writing, NTIA has not issued any closeout requirements specific to EHP.

- ConnectMT will closely track NTIA guidance on semi-annual and closeout 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.