

BEAD NEPA Project Area Review Instructions

This review form will help BIG BEAD Program subgrantees evaluate their BEAD projects and potentially customize project areas that should move ahead as separate projects for National Environmental Policy Act (NEPA) review. This form must be submitted to UBC for review and approval prior to beginning the environmental review process.

Overview

The National Telecommunications and Information Administration (NTIA), the federal agency administering BEAD, has developed tools to assist BEAD subgrantees with the environmental review process.

One of these tools, the Environmental Screening and Permitting Tracking Tool (ESAPTT), will be used by the Utah Broadband Center staff to document the environmental review process for each BEAD project. ESAPTT will create one NEPA project area ID for each BEAD Deployment Project ID submitted to NTIA in [UBC's Final Proposal](#). All BEAD Deployment Projects, even those that may qualify for NEPA exemption, must be entered into ESAPTT.

If requested by the subgrantees, multiple NEPA project area IDs (also referred to as "NEPA Project Areas") can be created and be associated with a single BEAD Deployment Project ID. This means that each BEAD Deployment Project may be subdivided into smaller areas for the purposes of streamlining NEPA review.

Since a single BEAD project may deploy broadband services to different geographic areas in Utah, this geographic diversity may unnecessarily expand the scope of the NEPA review, complicating and potentially delaying approval for projects that would have independent functionality.¹ As there are potential benefits and drawbacks for BEAD project deployment by creating multiple NEPA Project Areas for a single BEAD project ID, it is important that subgrantees review this form and consider potential benefits and drawbacks:

Potential Benefits of Segmentation to Consider:

- **Accelerating Deployment:** Areas without environmental constraints should receive NEPA approval quickly and begin construction sooner, rather than waiting for reviews in other parts of the subgrantee's project.
- **Meeting Deadlines:** Begin serving customers in ready areas while consultations continue elsewhere, helping subgrantees meet BEAD deployment deadlines.
- **Accessing Grant Funds:** Once NEPA approval is received for an area, grant funds associated with Milestone 2 may be disbursed for the areas receiving NEPA approval.

¹ These segments must have independent functionality. This means that the network to be built in each NEPA area must be able to function on its own, without needing other parts of the project to be built first.

Potential Drawbacks of Segmentation to Consider:

- **Increasing Costs:** Each NEPA Project Area requires separate environmental review documentation, potentially increasing consultant fees.
- **Creating Administrative Burden:** Managing multiple NEPA reviews means tracking multiple timelines, submissions, and approval processes with NTIA and other regulatory agencies.
- **Adding Deployment Inefficiencies:** Small NEPA Project Areas may not justify the additional cost of mobilizing and commencing deployment activities.

Project Description and Mapping Requirements

There are specific project description and mapping standards subgrantees must provide that NTIA expects for all ESAPTT project records. Each NEPA project area's documentation must incorporate these standards:

- **Project Description Summary:** 1,000-character (maximum) project summary describing the infrastructure elements and activities subject to environmental review. The summary must include the number of locations to be served, the technology type, and any relevant contextual information.
- **Detailed Project Description Overview:** The detailed project description must clearly describe what will be constructed; where work will occur (by address or extent of project limits); the site and surrounding area, including maps and photographs as appropriate; and how the project will be implemented.
- **Project Map Overview:** All projects must have a map for UBC staff to upload into ESAPTT. The map subgrantees provide must be complete and sufficiently scaled to support the environmental analyses; specific to the particular project area; illustrative of all routes, locations, and footprints of federally-funded project infrastructure; and clearly keyed/labeled by technology types and by existing vs. new infrastructure.

Example maps and project descriptions can be reviewed on [NTIA's Sample ESAPTT Project Maps and Descriptions](#) guidance.

Review Process

The following pages of this form are meant to help subgrantees verify the following for each of their segmented NEPA project areas:

- **Each NEPA Project Area has Independent Utility.** This means the project can provide service on its own, without needing other parts of the overall BEAD project to be built first. It must deliver a real, usable service improvement to end-users independently.
- **Each NEPA Project Area has been Operationally Properly Segmented.** This means subgrantees haven't split the BEAD project into smaller NEPA Project Areas without taking into consideration whether the sections would be independently operational just to avoid a more detailed NEPA review. Any division into multiple NEPA Project Areas must be based on clear

operational reasons, not to bypass a more thorough analysis (like breaking a project into smaller parts to qualify for a Categorical Exclusion when an Environmental Assessment would normally be needed).

Subgrantees who do not want to identify separate NEPA Project Areas for their BEAD projects should simply notify UBC. They do not need to fill out this review form.

Steps for Subgrantees to Segment NEPA Project Areas

Subgrantees should follow these steps to segment a BEAD Deployment Project into smaller NEPA areas:

1. Use [NTIA's ArcGIS Pro Permitting and Environmental Information Tool \(APPEIT\)](#)² ([APPEIT user guide](#)³) to evaluate the overall BEAD project area. This online tool will generate reports that may help to highlight potential issues that could delay the NEPA process, such as the presence of federal land or the presence of critical habitat for a threatened or endangered species.
2. Based on the evaluation results, identify one or more separate NEPA Project Areas that would have independent utility. These NEPA Project Areas would be expected to move through the NEPA review process more quickly than areas whose environmental review could be delayed due to the issuance of a NEPA decision.
3. Once the separate NEPA Project Areas are identified, use the APPEIT online tool to evaluate each NEPA Project Area to verify the assumption that the projects' environmental reviews could potentially be accelerated.
4. Fill out the form at the end of this document to record the evaluation results.

Documentation to Submit for NEPA Project Area Review

Subgrantees should submit the following documentation to UBC to review the proposed NEPA Project Areas:

1. NTIA APPEIT report for originally-awarded BEAD Deployment Projects
2. Shapefiles for proposed NEPA Project Areas that define the geographic boundaries of the subgrantee's proposed NEPA Project Areas
3. NTIA APPEIT reports for each proposed NEPA Project Area
4. Completed NEPA Project Area Review Form (at the end of this guidance) for each NEPA Project Area (subgrantee to complete middle column of form)
5. Completed "NEPA_Project_id_Completed_[PROJECT NAME].csv" file. Subgrantee must input data in the following columns: "location_id"; "project_id"; "project_description"; and "NEPA_project_id". The csv file must include all BSL ids awarded in the original BEAD Deployment Project, and each BSL id must be associated with a NEPA project id. UBC will fill out the "technology", "project_name", "uei", "cai", "latitude", and "longitude" columns, using the NTIA-approved csv files from UBC's final proposal. These csv files can be accessed at <https://connecting.utah.gov/grants/big/final-proposal/> (Exhibits A-E). Table 1 below describes the required information for each column.

Table 1

Column	Column title	Description
A	location_id	Broadband Serviceable Location ID assigned to the location to be served by the project (refer to the "fp_locations.csv" file from the BEAD Final Proposal) Subgrantee updates data in this column

² <https://nbam.ntia.gov/content/37fa42c6313e4bdb9d8a9c05d2624891/about>

³ https://broadbandusa.ntia.gov/sites/default/files/2025-04/NBAM_APPEIT_User_Guide.pdf

Column	Column title	Description
B	project_id	BEAD Project Deployment ID number (refer to the “fp_locations.csv” file from the BEAD Final Proposal) Subgrantee updates data in this column
C	technology	Broadband technology code for the technology used to deploy broadband service to the location (i.e. 50 [fiber], 61 [non-geostationary satellite], 70 [unlicensed terrestrial fixed wireless], 71 [licensed terrestrial fixed wireless], or 72 [licensed by rule fixed wireless])
D	project_name	Project name (refer to the “fp_deployment_projects.csv” file from the BEAD Final Proposal)
E	project_description	Project description (up to 1,000 characters) describing infrastructure elements and activities subject to environmental review, including number of locations to be served, technology type, deployment method, and relevant contextual information. This field will be imported into the Final NEPA Decision Memo for the project. See examples below: Sample ESAPTT Project Description Summary (Buried Fiber) Installation of 58 miles of buried fiber optic cable in a previously disturbed, existing road right-of-way along Route 42 from Dalton to Marysville to serve 35 residences in Whitefield and Murray Counties, Example State. Sample ESAPTT Project Description Summary (Tower Project) Construction of two monopole and two lattice communication towers to serve 240 residences between Willows City and Copper City, in New County, Example State. Subgrantee updates data in this column
F	uei	Unique Entity Identifier (UEI) number (refer to the “fp_deployment_projects.csv” file from the BEAD Final Proposal)
G	uei_name	UEI name (refer to the fp_subgrantees.csv file from the BEAD Final Proposal)
H	cai	Community Anchor Institution (CAI) presence, as applicable (denotes if an entry is a CAI; refer to the “fp_CAI.csv from the BEAD Final Proposal)
I	latitude	CAI Latitude (refer to the “fp_CAI.csv from the BEAD Final Proposal)
J	longitude	CAI Longitude (refer to the “fp_CAI.csv from the BEAD Final Proposal)
K	NEPA_project_id	The BEAD project ID number with a hyphen and N1 (meaning, NEPA Project Area 1), N2 (meaning, NEPA Project Area 2), etc. added at the end. Make sure that each location ID is assigned to the correct NEPA project area. Subgrantee inputs data in this column

Figure 1 below shows entries for an example form.

location_id	project_id	technology	project_name	project_description	uei	uei_name	cai	latitude	longitude	NEPA_project_id
123456789	CM61-BEAD-UT-ZZ1	50	Utah-Sample BEAD Project	Installation of 10 miles of buried fiber in existing right of way along Main Street to serve 15 residences in Utah.	ABC2DEF3GH4	Sample ISP	0			CM61-BEAD-UT-ZZ1-N1
123456799	CM61-BEAD-UT-ZZ1	72	Utah-Sample BEAD Project	Construction of one lattice communication tower to serve 30 residences in Utah.	ABC2DEF3GH4	Sample ISP	0			CM61-BEAD-UT-ZZ1-N2
123456889	CM61-BEAD-UT-ZZ1	50	Utah-Sample BEAD Project	Installation of 10 miles of buried fiber in existing right of way along Main Street to serve 15 residences in Utah.	ABC2DEF3GH4	Sample ISP	1	40.5377	-112.1270	CM61-BEAD-UT-ZZ1-N1

Figure 1

NEPA Project Areas Review Submission and Next Steps

Subgrantees will complete the NEPA Project Areas workflow in the Automated Reporting and Compliance (ARC) Portal and submit the five (5) documents listed above for each BEAD Deployment Project to UBC for review. The files must be submitted through the ARC grant portal. Additional information may be requested following review by UBC and its consultant team.

If you have any questions, please reach out to UBC via the ARC Portal or the Connecting Utah Inbox at connectingutah@utah.gov.

NEPA Project Area Review Form

Subgrantees should complete this form for each proposed NEPA Project Area.

Subgrantee	
BEAD Project Name	
BEAD Project ID	
Proposed NEPA Project ID	
Date Review Form Completed	
EHP Consultant/Staff Name and Organization	
EHP Consultant/Staff Email and Phone Number	

Question/Topic	Subgrantee Response	UBC Review Comment
Was the NEPA Project Area shapefile provided by the subgrantee?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Was the APPEIT report provided by the subgrantee?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is independent utility ⁴ confirmed by the subgrantee?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Does the subgrantee affirm that improper segmentation ⁵ has not occurred?	Yes <input type="checkbox"/> No <input type="checkbox"/>	

⁴ Independent utility means the project can provide service on its own, without needing other parts of the overall project to be built first. It must deliver a real, usable service improvement to end-users independently.

⁵ Improper segmentation means a subgrantee hasn't split the project into smaller NEPA Project Areas just to avoid a more detailed NEPA review. Any division into multiple NEPA Project Areas must be based on clear operational reasons, not to bypass a more thorough analysis (like breaking a project into smaller parts to qualify for a Categorical Exclusion when an Environmental Assessment would normally be needed).

Question/Topic	Subgrantee Response	UBC Review Comment
Does the project intersect with federal land?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
Does the project intersect tribal land or tribal trust or treaty lands?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
What potential state permitting agencies have been identified in the project area?	Provide a list:	
Does the project area have any known sites listed, or eligible for listing, on the National Register of Historic Places?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
Does the project area have critical habitat for threatened or endangered species that may be affected?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
Does the project area have waters of the United States, including wetlands, that may be affected?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
Does the project area have any floodplains or Federal Emergency Management Agency Flood Hazard Zones that may be affected?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
Does the project area contain any hazardous materials sites, impaired waters, sole-source aquifers, or Clean Air Act non-conforming areas?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
Does the project area have power lines, railroads, or other infrastructure that may be affected?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	
Does the project area have any other unique issue that may not be listed above?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe:	