

MN BEAD Program Environmental and Historic Preservation Questionnaire Instructions

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Contents

- NEPA Summary2
- Additional Document Submissions:2
- NEPA and Project Consultation.....3
- Limited Permissible Pre-Implementation Activities3
- Project Definition5
- What is included in a Project Area?5
- Scope of Work.....5
- Geographic Information System (GIS) Data6
- GIS File Format:6
- Submitting Environmental Files to the OBD.....9
- Contact for Questions9

NEPA Summary

The National Environmental Policy Act of 1969 ([42 U.S.C. 4321, et seq](#)) (NEPA) requires the consideration of environmental effects related to federal decision making, including the awarding of grant funds. Broadband Equity, Access and Deployment (BEAD) Program Grantees cannot complete any project activities (except those considered Limited Permissible Implementation Activities in the [General Terms and Conditions for NTIA BEAD Program Funds](#)) prior to the completion of review required under NEPA. To facilitate the review of awarded BEAD projects, the Office of Broadband Development (OBD)—in fulfillment of its role as a joint lead agency for the BEAD Program in accordance with [42 U.S.C. 4336a, et seq](#)—requires grantees to complete Environmental and Historic Preservation (EHP) questionnaires for the NEPA environmental review based in part on information requested by the National Telecommunications and Information Administration (NTIA).

There are two EHP Questionnaires required for grantees to complete and submit through the Grantor Portal:

MN BEAD Program Environmental and Historic Preservation Project Details

Questionnaire: This questionnaire must be completed first and is required prior to BEAD contracting and focuses on project area description, construction details, and scope of work. The purpose of this questionnaire is to gain enough information from the Grantee for OBD to understand if the proposed project meets a NEPA Categorical Exclusion (CatEx).

MN BEAD Program Environmental and Historic Preservation Impact Screening

Questionnaire: This questionnaire can be submitted anytime after the first questionnaire has been approved and will be required to satisfy grant milestones that focus on potential project impacts. The purpose of this questionnaire is to gain enough information from the Grantee for OBD to understand if the proposed project meets any NEPA Extraordinary Circumstances. If a project fits within a CatEx, but also meets an Extraordinary Circumstance, then the project may require further environmental review.

These documents will aid OBD in completing NEPA requirements through NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT). Both questionnaires will need to be completed for each project area. If you have multiple NEPA project areas, both questionnaires will need to be completed for each NEPA project area. Grantees should provide thorough answers to the items in the questionnaires to reduce the time needed for additional OBD staff review or follow-up questions. The questionnaires are designed to meet federal requirements and do not include all information regarding all applicable state, county, and municipal regulations. After submission, OBD staff will review the questionnaires. If more information is needed from recipients, or answers in the questionnaires are unclear, OBD staff will follow up with the Grantee.

Additional Document Submissions:

In addition to the EHP Questionnaires, Grantees will also submit the following documents in the OBD Grantor Portal:

- Scope of Work

- Geospatial Data of the Project Area
- NEPA Milestone Schedule
- PDF maps of the project area including: a USFWS NWI Wetlands Map, a FEMA Floodplain Map, and a [MN Natural Heritage Conservation Planning Report](#).
- Official Correspondence Documents between Grantee and all state, federal, county, or local governments (relating to permitting)

OBD staff reserves the right to request additional information and/or documents from BEAD subrecipients to complete the NEPA review, including but not limited to maps, ground-level or aerial photos, surveys, and/or reports.

NEPA and Project Consultation

Following the completion of the EHP Questionnaires, as capacity is available, OBD staff will facilitate the following required consultations as part of the NEPA review:

- National Historic Preservation Act of 1966 (54 U.S.C. §306101, et seq.); 36 CFR Part 800) (NHPA) Section 106 Consultation with Minnesota State Historic Preservation Office (SHPO) and NTIA.
- Endangered Species Act of 1973 (16 U.S.C. §1531, et seq.; 50 CFR Part 17) (ESA) Section 7 Consultation with the U.S. Fish and Wildlife Service.

Following the completion of these consultations and any additional consultations deemed necessary through the review process, OBD staff will submit project information to NTIA for issuance of NEPA decision documents.

Issued decision documents may be Categorical Exclusion (Cat Ex) determination, Record of Environmental Consideration (REC), Finding of No Significant Impact (FONSI), or Record of Decision (ROD), as according to [42 U.S.C. 4321, et seq.](#) and the [NTIA General Terms and Conditions for NTIA BEAD Program Funds](#). OBD will also issue a "Notice to Proceed" Document when the NEPA requirements have been met.

Limited Permissible Pre-Implementation Activities

According to the NTIA General Terms and Conditions for NTIA BEAD Program Funds, Grantees shall not begin implementation activities prior to the completion of all environmental requirements. Recipients shall also comply with all conditions placed on the grant-funded activities resulting from the environmental review, such as mitigation requirements, best management practices, or other measures necessary to reduce environmental impacts.

The Grantees may undertake limited permissible activities under NEPA using award funds prior to the completion of the environmental review process, including the following:

- Pre-construction planning, including collecting information necessary to complete environmental reviews;
- Applications for environmental permits;
- Studies including, but not limited to, Environmental Assessments (EA), wetland delineations, biological assessments, archaeological surveys, and other environmental reviews and analyses;
- Administrative costs;

- Pre-award application costs;
- Activities supporting consultations required under the NHPA, the Endangered Species Act, and the Clean Water Act; and/or
- Limited, preliminary procurement, including the purchase or lease of equipment, or entering into binding contracts to do so; the purchase of applicable or conditional insurance; and/or funds used to secure land or building leases (including right-of-way easements).

Project Definition

Recipients must submit environmental impact documentation that corresponds to a specific project. Within each project, the Grantee will submit documentation that captures all construction-related project activities, also known as the Project Area. The NEPA review considers all construction-related activity for the project, including areas outside of the awarded project locations.

To see examples of project maps and project descriptions that will be used for the ESAPTT tool, see this [NTIA guidance: Sample Project Descriptions and Maps for BEAD Environmental and Historic Preservation \(EHP\) Review](#)

What is included in a Project Area?

The Project Area is the construction space needed to complete the awarded project. This includes (but is not limited to):

- the total construction footprint
- all groundbreaking associated with construction
- the proposed route and/or facilities
- associated existing facilities and connections to existing facilities
- temporary and permanent access roads proposed outside of road ROWs
- laydown/preparation areas.

The environmental review outlined in these instructions must consider all construction activities necessary to complete the awarded projects. Defining the Project Area assists OBD staff with evaluating the impacts of different construction activities and the total environmental impact possible from the project.

Scope of Work

Grantees shall submit a complete a Scope of Work Project Description as part of their NEPA Review. The Scope should provide as much detail as possible, while also remaining succinct (no more than three pages long). Project Descriptions should include the following:

- What is being constructed.
- A description of where the project is proposed (i.e., address, Township, Range, Section, Latitude/Longitude), and a physical description of the site/route and surrounding area (developed land vs. open space, adjacent natural resources, such as rivers, wetlands, or forests; and any protected lands).
- Information on deployment methods. For example, will the project be deployed aerially on existing poles, or mechanically trenched into the ground alongside existing utilities.
- A detailed description of how the project will be implemented, which includes necessary ground disturbance, connected actions, pre-construction preparations, and follow-up activities following the completion of construction.
- If any are known and if applicable, please describe existing utilities in the project area that the fiber will be placed alongside.

- Project metrics (dimensions, areas, distances, depths, thicknesses, etc.) as applicable
- Any mitigation actions the Grantee knows will need to occur to accomplish the project.
- If applicable, a decommissioning or maintenance plan regarding the construction project.

Geographic Information System (GIS) Data

Awarded BEAD projects are currently depicted as broadband serviceable location (BSL) points, showing the individual addresses that will receive new or improved broadband service as a result of the BEAD project. Alongside submission of documentation for environmental reviews, it is necessary for subrecipients to provide a detailed view of project construction in the form of geospatial data that depicts: (a) the locations being served, (b) the planned placement of network infrastructure built with BEAD funds, and (c) the extent of ground disturbance of construction activities.

Grantees must submit geospatial data consistent with the following specifications. Incomplete or insufficiently detailed geospatial files will be returned to grantees, which may delay environmental reviews, grant agreement milestones, and associated access to BEAD funds. In instances where a Grantee is unsure of a project's design characteristics or ground disturbance, they should clearly indicate that uncertainty and err on the side of depicting the maximum possible disturbance caused by the construction (for example if you're not sure which side of the road you will place the fiber, include the entire road ROW as part of your project area).

GIS File Format:

- A file geodatabase (.gdb) with feature classes; or a map (.mpkx), layer (.lpx), or project (.ppkx) package is preferred.
- Shapefiles are not preferred but acceptable.
- KML/KMZ files will not be accepted.
- File geodatabase and shapefile submissions should be zipped, it is not necessary to zip map/layer packages.
- Do not include aerial imagery in your geospatial files.
- OBD GIS staff use ESRI's ArcGIS Pro desktop software.

GIS File Name: File names should begin with your entity name and include the assigned BEAD project id. Be sure to include the NEPA project ID if applicable.

GIS File Scope: Grantees must submit separate geospatial files for each given BEAD Project (and, if applicable, each NEPA project area). Do not combine multiple BEAD projects into a single geospatial file.

GIS File Submission: Files must be uploaded to the OBD Grantor Portal.

GIS File Contents: Where applicable to the network design and broadband technology being used, files should depict the following components of the project. The following list is not intended to be exhaustive nor are the listed items required for each project, but grantees should use this list as a reference in preparing a sufficiently detailed geospatial file.

GIS All Projects:

- As polygons: Total construction footprint, depicting the entire project boundary, within which all construction activities will occur. This includes all ground disturbance that will occur due to the project.
- As points, lines, or polygons: Interconnection points with existing facilities, i.e., the point at which BEAD construction terminates and connects to existing infrastructure not funded by BEAD. This may include existing middle-mile routes at which the construction originates or existing towers on which upgraded radios will be placed.
- As polygons: Preparation or staging areas where storage of vehicles, equipment, or supplies will cause a temporary disturbance to the existing landscape.
- As polygons: Any temporary or permanent access roads that will be constructed outside of existing road right of way.

GIS Wireline Projects:

- As lines or polygons: The planned placement of wireline facilities along the project route. For lines in road right of way, indicate the side of the road on which the facility will be placed. If the side of the road is uncertain at the time of submittal, you may include the entire ROW as the project location, just be aware that this may trigger more environmental concerns than necessary. Wireline facilities should include details about the placement of the facility, if it is aerial or buried, and if buried what technique is used (trenching, boring, etc.). If using different ground disturbance techniques throughout the line, be sure the feature(s) clearly differentiate by installation method. If applicable, indicate if placement is on an existing pole or in existing conduit.
- As points: The awarded BSL locations for the project.
- As polygons: For underground placement, indicate areas of ground disturbance, which may include trenches, boreholes, handholes, etc. For trenches, include the trench width. You should also include all the planned location of pedestals, vaults, or other new infrastructure.
- As lines: The drops from the mainline construction to each individual location. As applicable, be sure to indicate the installation technique (hung, trenched, etc.).

GIS Terrestrial Wireless Projects:

- As polygons or points: The footprint of the planned or existing wireless tower or other structure on which radios will be placed. Indicate if the tower or structure is new or existing. Be sure to also include the construction footprint for new tower builds.
- As polygons or points: Any customer premises equipment installed by the Grantee that will disturb the ground because it is not placed on an existing structure.

GIS Non-Terrestrial Wireless Projects:

- As polygons: The footprint of any ground stations that will be constructed or improved to support connectivity to BEAD-funded locations. Indicate if the ground station is new or existing.

Example map: Below is a simple example of a wireline project, depicting the staging area, wireline placement, installation technique, and interconnection points.

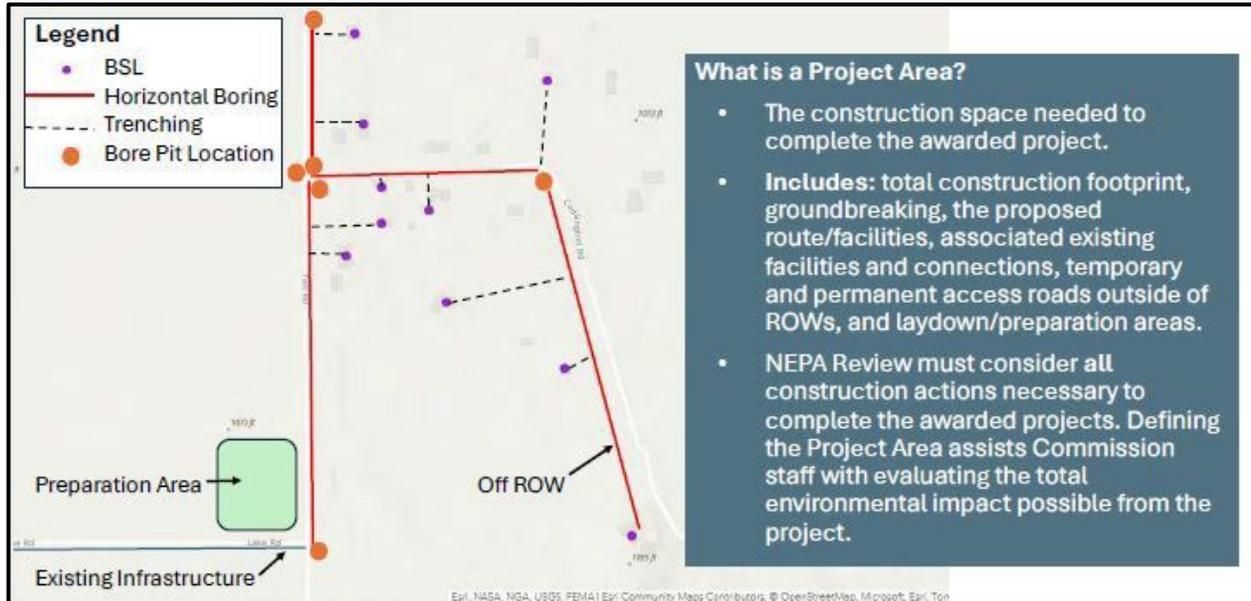


Image Source: Wisconsin Public Service Commission

Submitting Environmental Files to the OBD

Grantees should use the OBD Grantor Portal to submit the EHP Questionnaires and any files associated with the Questionnaires. The Questionnaires and associated files should be uploaded to the specific project in the OBD Grantor Portal. For review organization, file names should begin with the subrecipient name, include the project id, and include a clear description of their contents. Unless indicated (ESRI ArcGIS data, Microsoft Excel tables, modeling, etc.), Grantees must submit all environmental documents in the format requested by OBD.

Grantees should also submit any official correspondence between the recipient and local, state, or federal government agencies related to permitting.

Naming Uploaded Files: File names should be formatted:

[Project id]_[Document Type]_[Subtype]_[Date Generated]

- Project Id: the BEAD Project ID. If there is a NEPA project area indicator, be sure to include that in the id as well.
- Document Type: General label for the document (e.g., Map, Project Description, IPaC Report)
- Subtype: More specific title that describes the document (e.g., Wetlands, USFWS Concurrence Letter, SHPO Letter)
- Date Generated: The date the file was created, in MMDDYY format

Contact for Questions

Grantees can direct questions about the environmental documentation to: **Minnesota**

Broadband Office BEAD General Inbox: deed.broadband@state.mn.us **OBD NEPA**

Specialist: Megan Messerole, megan.messerole@state.mn.us