

**Broadband Equity, Access, and Deployment (BEAD)
Program Environmental Questionnaire and NEPA Review
Process**

User Guide



**OFFICE OF
BROADBAND DEVELOPMENT**

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Overview

The KY OBD environmental questionnaire will be available for subgrantees in the grant portal after subgrantee agreements are signed. The questionnaire will assist OBD in identifying projects that can be categorically excluded, uploading supporting documents, and obtaining a final NEPA decision from NTIA. Please review the following before completing the questionnaire to determine relevance to your project:

Permitting & Environmental Information on the OBD website

<https://broadband.ky.gov/BEAD/Pages/Subgrantee-Selection.aspx>

Categorical Exclusions & Extraordinary Circumstances (starts on page 40)

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

Best Management Practices and Mitigation Measures

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

NTIA ArcGIS Pro Permitting and Environmental Information Tool (APPEIT) to assist with preliminary identification of area that may require permits or planning to avoid potentially significant impacts.

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

USFWS Section 7 “No Effect” List

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

SHPO Section 106 Broadband Notice of Procedure

<https://heritage.ky.gov/compliance/applicants/Pages/default.aspx>

Wetlands Map of project area

<https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>

Floodplain Map of project

<https://msc.fema.gov/portal/home>

Required Documents

Examples of project descriptions and maps can be found:

https://broadbandusa.ntia.gov/sites/default/files/2026-04/DOC_NTIA_Sample_ESAPTT_Project_Maps_and_Description_April_2026.pdf

1. **Project Description Summary:** Describe, in 1,000 characters or less, the infrastructure elements and activities subject to environmental review, including the number of locations (BSLs and CAIs) being served, the technology type, the deployment activities (how long is the fiber route; how many poles are being added/replaced, etc.), and relevant contextual information.
2. **Detailed Project Description:**
 - a. What will be constructed (e.g., a 150' monopole communication tower)
 - b. Where will work occur by address (e.g., 123 Main Street) or extent of project limits (e.g., the route the project will follow with access roads and staging areas used)
 - c. The site and surrounding area (e.g., developed land vs. open space; adjacent natural resources, such as rivers, wetlands, or forests; and any protected lands), with maps and photographs as appropriate
 - d. How the project will be implemented including the extent of construction, such as the area and depth of ground disturbance or estimated number of utility poles involved (e.g., installation of a concrete pad, an equipment shed, and an emergency generator with a 400-gallon above-ground fuel storage tank requiring 1 acre of disturbance at approximately 5 feet depth)
3. **Project map:** Map must include significant context on the surrounding environment of the NEPA project area. The map must:
 - a. Be appropriately scaled to display the entire NEPA project area and demonstrate where in the BEAD project area the NEPA project area fits (if applicable).
 - b. Display surrounding topography and environment in the project area to provide context of project area (i.e. web-based GIS image, aerial photo, geographic or topographic map)
 - c. Illustrate all routes, locations, and footprints of federally-funded project infrastructure (e.g., fixed wireless project maps must show the limit and extent of all ground disturbance, not just BSLs served)
 - d. Contain a clear key that labels technology types, existing versus new infrastructure, and other important data points shown in the map
4. **Endangered Species Act Section 7**
 - a. USFWS IPaC letters

- i. Instructions: <https://www.fws.gov/office/kentucky-ecological-services/kentucky-field-office-project-review-guidance>
- b. Or policy memo
 - i. https://broadbandusa.ntia.gov/funding-programs/policies-waivers/NTIA_FWS_Non-Federal_Designation_Memo

5. Section 106

- a. Chronicle Heritage will be conducting Section 106 reviews for all BEAD projects.
- b. Provide CAD and SHP files to khigelmire@chronicleheritage.com and taylor.burchett@ky.gov for review. If you are unable to produce CAD files, SHP files alone will suffice. Separate each project into underground and aboveground categories as applicable and note box, tower, hut, etc. locations. The more details you provide, the faster and easier the review will be. Please be sure to clearly include ISP name and any project identification numbers.

6. USFWS Wetlands map

- a. <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>

7. FEMA Floodplain map

- a. <https://msc.fema.gov/portal/home>

Required document name format for uploads:

- **File names should be formatted:** [Document Type]_[Subtype]_[Date Generated]
 - **Document type:** General label for the document (Map, Project Description, IPaC Report)
 - **Subtype:** More specific title that describes the document (Wetlands, USFWS Concurrence Letter, SHPO Letter)
 - **Date Generated:** Date the file was created, in MMDDYY format.
 - **Example:** Map_Wetlands_061826

KY OBD Environmental Questionnaire

Below are questions you will find on the environmental questionnaire. Do not be concerned if all of the questions do not appear in your project's questionnaire. Questions and fields included on the form conditionally render in the online system and apply logic to identify potentially applicable categorical exclusions. Users must provide a response to each visible required question (denoted with *) and upload required information.

With any consultation and submission to a NEPA, NHPA, or permitting agency, please include your BEAD award number.

Questions marked with * are required.

Questions are subject to change with additional NTIA guidance.

Caution for Firefox browser users: Your answers in the Categorical Exclusions section might disappear and default back to the "Select" option as you progress through the other sections. Your original saved answers DO save in the system and will appear on your submitted form. It is recommended, however, to use a browser other than Firefox.

Categorical Exclusions

Section 1

*1. Does the proposed project include the construction of buried and/or aerial telecommunications lines, cables, and related facilities?

*1.1 Will fiber be added to transmission structures and/or buried in existing rights of way?

Section 2

*2. Will new or existing communications systems be acquired, installed, operated, or removed for the proposed project?

*2.1 Will system instruments be retrofitted, upgraded, repaired, or replaced?

*2.2 Will the activities described in this section impact a structure that is eligible for listing in the National Register of Historic Places?

Section 3

*3. Select all infrastructure elements and related activities that are included in the proposed project scope and answer associated questions:

- (3.1) Towers and directly related structures

- (3.2) New construction upon or improvement of land and/or non-tower structures
- (3.3) Modification of existing fiber optic cable
- (3.4) Existing buildings, roads, airfields, grounds, equipment, and other facility modifications

Towers and directly related structures:

*3.1.1 Select all actions applicable to the proposed project:

- Siting
- Construction/installation
- Operation/maintenance
- Retrofitting

*3.1.2 Will the proposed tower actions require new ground disturbance?

*3.1.2.1 What is the area of the ground disturbance?

*3.1.2.2 Will the ground disturbance be located in a previously disturbed area?

*3.1.3 Will the total height of any tower exceed 199’?

*3.1.4 Will any tower structure require guy wires?

*3.1.5 Will the actions selected in 3.1.1 impact any National Register of Historic Places eligible structure?

*3.1.6 Will the construction of any tower structure trigger an Environmental Assessment or Environmental Impact Statement by another Federal Agency?

New construction or improvement of land and/or non-tower structures:

*3.2.1 Select all actions applicable with the proposed project scope:

- Construction or modification of aerial or buried utility or communication systems that use existing rights of way, easements, grants of license, distribution systems, facilities, or similar arrangements.
- New construction in developed area or on previously disturbed site.
- Land improvement in developed area or on previously disturbed site.
- Construction or improvement of operations or support facilities, switching stations, maintenance facilities, other non-tower structures on previously disturbed ground.
- Construction or improvement of new temporary buildings or experimental equipment on previously disturbed ground.

- Construction, land improvement, or modification of structures in an undeveloped area or on a pristine (undisturbed) site.

*3.2.2 Will any of the actions listed in 3.2.1 require new ground disturbance?

*3.2.2.1 What is the area of ground disturbance for land improvements and non-tower structures?

*3.2.2.2 Will the ground disturbance be located in a previously disturbed area?

*3.2.3 Will any of the actions listed in 3.2.1 require ground disturbance in an undeveloped area or on a pristine (undisturbed) site?

*3.2.4 Will all construction or improvement be compatible with local planning, zoning, and Coastal Management Programs?

*3.2.5 Will the site and scale of construction or improvement be consistent with the scale of existing, adjacent, or nearby buildings?

*3.2.6 Does any construction or improvement require new local infrastructure (e.g. roads)?

Modifications of existing fiber optic cable:

*3.3.1 Select all actions applicable with the proposed project scope:

- Modifications, changes, or upgrades of existing telecommunication lines, transmission lines, or aerial buried utility or communication systems.
- Pole replacement.
- Rebuilding existing power or telecommunication lines.

Will pole replacements:

*3.3.2.1 Exceed 20% of the original pole quantity?

*3.3.2.2 Be of similar appearance to the original pole structure(s)?

*3.3.2.3 Be in or near the original pole location(s)?

*3.3.2.4 Occur within the existing right of way?

*3.3.3 Will any of the actions listed in 3.3.1 take place outside rights of way?

*3.3.3.1 If outside rights of way, will action(s) be adjacent to right of way, new road, or easement?

Existing buildings, roads, airfields, grounds, equipment, and other facility modifications:

*3.4.1 Select all actions applicable with the proposed project scope:

- Exterior renovation, addition, repair, alteration, or demolition.
- Internal renovations or additions.
- General minor renovations and/or additions.
- Purchase, lease, or use of existing facilities (or a portion thereof).
- Conducting new activities or operations in existing structures.
- Installing, operating, maintaining, retrofitting, upgrading, repairing, removing, and/or replacing instruments.
- Collocating equipment on instruments, structures, or buildings.
- Changes to existing telecommunication facilities (including upgrades, changes, or additions).
- Acquisition, installation, operation, and/or removal of communication systems.
- Close facilities, decommission equipment, or temporarily discontinue use of facilities or equipment.
- Phase of voltage conversions, reconductoring, or upgrading of existing electric distribution lines or telecommunications facilities.

*3.4.2 Will the actions listed in 3.4.1 result in a change in the functional use or operations of real property?

*3.4.3 Will the changes to telecommunications sites and structures require new physical disturbance or fencing of less than an acre?

*3.4.4 Will the actions selected above impact any National Register of Historic Places eligible structures?

*3.4.5 Will hazardous waste be disposed of at approved sites in accordance with all applicable laws, regulations, and requirements?

Extraordinary Circumstances & Best Management Practices

1. Proposed action occurs within an environmentally sensitive or unique geographic area of notable recreational, ecological, scientific, cultural, scenic, or aesthetic importance.

*1.a Attach a map identifying the resource(s) and relationship to the project.

1.b Provide any additional information needed to explain or support your answer.
(optional)

*2. Proposed action may adversely impact species listed or proposed to be listed as Endangered or Threatened Species or have adverse effects on designated Critical Habitat for these species.

*2.a Will the proposed project have adverse impacts on any Endangered or Threatened Species and/or designated Critical Habitat (including Essential Fish Habitat)?

*2.b Does the proposed project require the deployment of submarine or underwater cable?

2.a.M Mitigation Commitments (Check all measures that will be implemented to avoid, minimize, or mitigate potential environmental impacts. Upload any supporting documentation.)

- Ensure revegetation of native plants and follow seasonal restrictions on construction activity.
- Assess locations of roost sites for bats and avoid bridge crossings during breeding and hibernation season.
- Avoid construction activities or relocate infrastructure in areas with known locations of habitats for threatened and endangered species and/or critical habitats.
- Consolidate facilities and/or modify deployment types by using aerial and buried fiber segments to minimize habitat loss for threatened and endangered species.
- Limit disturbance to the ground surface and vegetation during construction activities, including avoiding activities within 1000 feet of bald eagle nests during the nesting season.
- Avoid suspected vulnerable plant species and avoid impacts to the road shoulder where they are suspected to occur.
- Avoid removal/disturbance of vegetation during bird nesting season, surveys for sensitive species.

- Conduct pre-construction surveys and minimize herbicide/pesticide application to prevent impacts to species.
- Use manual labor in place of heavy machinery to reduce impacts in sensitive areas.
- Implement monitoring programs, adaptive management strategies, and conduct worker training that is reviewed and approved periodically.
- Change the route location, reroute new aerial and/or buried fiber segments or other infrastructure.
- Avoid permanent disturbance of habitat and/or define seasonal restrictions to ensure construction occurs outside of nesting periods.
- Conduct pre-construction surveys and minimize herbicide/pesticide application to prevent impacts to species and/or critical habitat.
- Minimize underwater construction noise in all aquatic habitats by minimizing vessel speed, using quieter equipment or technologies, or deploying bubble curtains or other noise screens during underwater work.

Describe any other measure that will be implemented to mitigate the potential for impacts.

Upload any supporting mitigation documentation.

*3. Proposed action may adversely impact protected migratory birds or their habitats.

3.a Attach any additional relevant documents.

3.b Provide any additional information needed to explain or support your answer.

3.M Mitigation Commitments (Check all measures that will be implemented to avoid, minimize, or mitigate potential environmental impacts. Upload any supporting documentation.)

- Remove vegetation outside of the active nesting season for migratory birds.
- Avoid permanent disturbance of habitat and/or follow seasonal restrictions to ensure construction occurs outside of nesting periods.
- Limit disturbance to the ground surface and vegetation during construction activities, including avoiding activities within 1000 feet of bald eagle nests during the nesting season. Remove vegetation outside of the active nesting season for migratory birds.
- Conduct nest surveys for migratory birds prior to construction activities. Avoid permanent disturbance of habitat and/or follow seasonal restrictions to ensure construction occurs outside of nesting periods.
- To the extent feasible, avoid Important Bird Areas (IBAs) and other known important bird habitats. Limit disturbance to the ground surface and

vegetation during construction activities, including avoiding activities within 1000 feet of bald eagle nests during the nesting season.

- Install migratory bird exclusion devices to discourage nest construction on tower sites, protection of any cave or other karst habitat. Conduct nest surveys for migratory birds prior to construction activities.
- Avoid development in areas containing high densities of breeding or wintering birds, in high wildlife use areas, migratory staging areas, and other publicly owned properties. Avoid Important Bird Areas (IBAs) and other known important bird habitats.
- Install migratory bird exclusion devices to discourage nest construction on tower sites, protection of any cave or other karst habitat.

Describe any other measure that will be implemented to mitigate the potential for impacts.

Upload any supporting mitigation documentation.

*4. Proposed action may adversely affect historic, archeological, or cultural sites, including Native American Traditional Cultural Properties, properties listed or eligible for listing on the National Register of Historic Places.

*4.a Was the Program Comment for Federal Communications Projects used for this project?

*4.b Was a Duplicative Wireless Review Program Comment used for towers?

*4.c Was a Programmatic Agreement or Memorandum of Agreement executed?

*4.d Attach Section 106 Documentation (e.g. Program Comment form, State Historic Preservation Office (SHPO) concurrence, etc.)

Provide any additional information needed to explain or support your answer.

4.M Mitigation Commitments (Check all measures that will be implemented to avoid, minimize, or mitigate potential environmental impacts. Upload any supporting documentation.)

- Contain all work within the disturbed portion of public right of ways and associated ditch back slopes.
- Implement approved Survey Plan.
- Implement approved Monitoring Plan.
- Engage a Tribal monitor in areas of sensitivity for Tribal resources.
- Implement mitigations formally established in a Programmatic Memorandum of Agreement.

- Select infrastructure locations that are screened by topography and/or vegetation and that do not require noticeable changes in landforms or vegetation.

Describe any other measure that will be implemented to mitigate the potential for impacts.

*5. Proposed action that restricts access to and ceremonial use of Indian sacred sites by Indian practitioners or adversely affects the physical integrity of such religious sacred sites.

5.a Attach any relevant documents.

5.b Provide any additional information needed to explain or support your answer.

*6. Proposed action occurring in floodplains or involving significant changes to or effects on waterbodies, wetlands, floodplains, water quality, sole source aquifers, public water supply systems or state, local, or tribal water quality standards established under the Clean Water Act of the Safe Drinking Water Act.

*6.a Will any portion or element of the project occur within and involve significant changes to or effects on a floodplain?

*6.a.1 Attach Federal Emergency Management Agency (FEMA) Flood Map.

6.a.2 Attach any relevant documents.

6.a.3 Provide any additional information needed to explain or support your answer.

6.a.M Mitigation Commitments (Check all measures that will be implemented to avoid, minimize, or mitigate potential environmental impacts. Upload any supporting documentation.)

- Implement management plan for water quality protection.
- Implement vegetation management and restoration plan.
- Implement management plan for erosion and sediment control.
- Implement Storm Water Pollution Prevention Plan (SWPPP).
- Implement Spill Prevention, Control, and Countermeasure Plan (SPCC).
- Restrict construction activities on or near the river or within floodplains (other than modification to existing facilities).
- Ensure any development proposed in a floodway or floodplain meets or exceeds state or local regulations.
- Stage materials storage and staging areas outside of waterways and floodplains.

- Utilize directional boring techniques or aerial deployment or attaching to existing bridges to avoid wetlands and floodplains. Avoid construction through waterways.
- Stay within existing infrastructure footprint and not disturbing surface water of floodplain resources.

Describe any other measure that will be implemented to mitigate the potential for impacts.

Upload any supporting mitigation documentation.

*6.b Does the project involve significant changes to or effects on waterbodies or wetlands, including the deployment of submarine or underwater cable?

*6.b.1 Attach U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory Map.

6.b.2 Attach any relevant documents, including, if applicable, details on the submarine cable deployment.

6.b.3 Provide any additional information needed to explain or support your answer.

6.b.M Mitigation Commitments (Check all measures that will be implemented to avoid, minimize, or mitigate potential environmental impacts. Upload any supporting documentation.)

- Implement management plan for Wetlands.
- Implement vegetation management and restoration plan.
- Implement management plan for water quality protection.
- Implement management plan for erosion and sediment control.
- Implement Storm Water Pollution Prevention Plan (SWPPP).
- Implement Spill Prevention, Control, and Countermeasure Plan (SPCC).
- Avoid above and belowground wetland crossings. When crossing a wetland is unavoidable, take advantage of already disturbed areas such as easements, roads, roadway shoulders, bridges, or old railroad beds.
- Incorporate measures to minimize erosion, sedimentation, and turbidity from stormwater discharge during construction.
- Install perimeter silt fences and locating equipment refueling and staging areas on inactive roads and away from wetland and riparian areas.
- Utilize directional boring techniques or aerial deployment or attaching to existing bridges to avoid wetlands and floodplains. Avoid construction through waterways.

- Obtain applicable Section 404 and Section 10 permits, Wetland Delineation Study, as well as a Water Quality Certification under Section 401.
- Stay within existing infrastructure footprint and not disturbing surface water or floodplain resources.
- Minimize in-stream work to the extent practicable. Route the stream crossing to minimize the number of waterbody crossings where waterbodies meander or have multiple channels.
- Maintain natural drainage patterns to the extent practicable by installing culverts in sufficient number and size to prevent ponding, diversion, and using erosion control blankets.
- Minimize ground disturbance in or near waterbodies during construction, by minimizing the total area of bare soil, restoring native vegetation, and using erosion control blankets.
- Prohibit use of herbicides or pesticides within 100 feet of any wetland (unless allowed or required by the appropriate land management, tribal, federal, state, or local agency.).
- Avoid stockpiling material from directional drilling in a wetland, or where the stockpile could cause sedimentation into a wetland or dam water, causing flowing of a wetland area. Avoid setting up drilling equipment in a wetland.
- Conduct dewatering in a manner that prevents erosion and prevent heavily silt-laden water from flowing directly into a wetland or waterbody if dewatering during an excavation.
- Implement a marine observer program during construction and operation to avoid and minimize boat strikes.
- Do not permit the use of underwater blasting and pile driving activities in any waterbody.

Describe any other measure that will be implemented to mitigate the potential for impacts.

*6.c Does the project involve significant changes to, or effects on water quality, sole source aquifers, or public water supplies?

6.c.1 Attach relevant maps.

6.c.2 Attach any relevant documents.

6.c.3 Provide any additional information to help explain your determination.

6.c.M Mitigation Commitments (Check all measures that will be implemented to avoid, minimize, or mitigate potential environmental impacts. Upload any supporting documentation.)

- Implement management plan for water quality protection.
- Implement management plan for erosion and sediment control.
- Implement Storm Water Pollution Prevention Plan (SWPPP).
- Implement Spill Prevention, Control, and Countermeasure Plan (SPCC).
- Avoid actions that could potentially impact a sole source aquifer.
- Maintain natural drainage patterns to the extent practicable by installing culverts in sufficient number and size to prevent ponding, diversion, or concentrated runoff.

Describe any other measure that will be implemented to mitigate the potential for impacts.

Upload any supporting mitigation documentation.

Pursuant to EO 14154, Unleashing American Energy (Jan. 20, 2025), EO 14096 has been revoked.

7. Proposed action may have a disproportionate and adverse human health or environmental effect on low-income populations, minority populations, or other communities with environmental justice concerns, as defined in EO 14096.

*8. Proposed action involving construction impacts on or near an active, inactive, or abandoned contaminated or hazardous waste site, or involving non-permitted generation, transportation, treatment, storage, or disposal of substances hazardous to human health or the environment, unless NTIA determines the action is consistent with an approved remediation plan for the site.

8.a Attach any relevant documents, map identifying locations of known soil/water contamination and Site-Specific Health and Safety Plans, Standard Operating Procedures for site preparation activities, and Emergency Response Plan, if applicable.

8.b Provide any additional information needed to explain or support your answer.

*9. Proposed action could involve human exposure to ionizing or non-ionizing radiation or use of any radiation in excess of the Federal Communications Commission's established Maximum Permissible Exposure limits for human exposure to Radiofrequency Electromagnetic Energy fields.

9.a Attach any relevant documents, including equipment specifications sheet, if applicable.

9.b Provide any additional information needed to explain or support your answer.

*10. Proposed action is controversial because of the introduction or employment of unproven technology, highly scientifically uncertain or unique environmental effects, substantial disagreement over the possible size, nature, or effect on the environment, or likelihood of degrading already existing poor environmental conditions.

10.a Attach any relevant documents.

10.b Provide any additional information needed to explain or support your answer.

*11. Proposed action may violate a Federal, Tribal, state, or local law, regulation, policy, or requirement imposed for the protection of the environment.

11.a Attach any relevant documents.

11.b Provide any additional information needed to explain or support your answer.

*12. Proposed size or scope of action is greater than is normal for an action of this type.

12.a Attach any relevant documents.

12.b Provide any additional information needed to explain or support your answer.

*13. Proposed action may cause other significant effects on human health or the environment that have not been otherwise addressed.

13.a Attach any relevant documents.

13.b Provide any additional information needed to explain or support your answer.