



# ENVIRONMENTAL OFFICE HOUR GUIDANCE

BEAD Program Environmental & Contracting Readiness Guidance for Provisionally Awarded Grantees

*THIS PRESENTATION PROVIDES GENERAL GUIDANCE AND DOES NOT CONSTITUTE AN ENVIRONMENTAL DETERMINATION OR AUTHORIZATION TO PROCEED WITH CONSTRUCTION.*

January 21, 2026

# Agenda

1. Purpose & Scope of Today's Environmental Office Hour
2. Environmental Review Requirements (*NEPA & State Permitting*)
3. Contracting
4. High-Level Post-Award Overview (*What's Coming Next*)
5. Key Environmental Resources & Tools
6. Q&A



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# 1. Purpose & Scope of Today's Environmental Office Hour

# Purpose & Scope of Today's Environmental Office Hour

Setting expectations for environmental review, permitting, and early readiness activities.

## What This Session Covers

- NEPA review expectations and sequencing
- State, local, and private permitting considerations
- Environmental questionnaire
- Contracting timeline
- High-level post award overview

## What This Session Does NOT Cover

- Detailed post-award compliance requirements
- Reimbursement processes and **invoicing guidance**
- Contract execution or payment workflows
- Ongoing reporting requirements

## Today's Scope and Why it matters:

Today's Focus	Why It Matters
Environmental Review & Permits	Avoid construction delays
Early Readiness Steps	Faster environmental approvals
Tools & Resources	Fewer resubmissions and revisions

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## 2. Environmental Review Requirements

# Environmental Readiness Overview

Defining the environmental actions required before construction can begin under BEAD.

What “Environmental Readiness” Means	Why Environmental Readiness Matters	Environmental Readiness Happens Before
<p>Environmental readiness confirms that all required environmental reviews, approvals, and permits are identified, initiated, and sequenced <b>before any ground-disturbing or construction activity begins.</b></p>	<ul style="list-style-type: none"><li>• Environmental review must be complete before payments will be received.</li><li>• Construction <b>cannot start</b> until environmental requirements are met.</li><li>• Early readiness reduces approval delays and rework.</li><li>• Unapproved work may result in <b>stop-work orders or ineligible costs.</b></li></ul>	<ul style="list-style-type: none"><li>• Construction mobilization.</li><li>• Ground disturbance or installation.</li><li>• Reimbursement requests.</li></ul>

# Key Environmental Readiness Activities (Before Construction)

Core environmental actions grantees should complete prior to starting construction.

## 1. Confirm NEPA pathway

- ❑ Determine whether the project qualifies for a Categorical Exclusion (CATEX). Identify any factors that could trigger additional review or consultation.
- ❑ ECD will work with grantees on next steps if the project does not qualify for CATEX.

## 2. Complete environmental screening

- ❑ Screen for historic, cultural, and natural resource considerations.
- ❑ Identify potential ESA, wetlands, floodplains, or other sensitivities.

## 3. Identify required permits and approvals

- ❑ Federal, state, local, and private permits (ROW, water, utility, railroad, etc.)
- ❑ Determine jurisdictional requirements along the full project route.

## 4. Initiate early coordination

- ❑ Engage agencies or landowners early where approvals are required.
- ❑ Begin consultations or permit applications as needed.

## 5. Document readiness

- ❑ Retain screening results, correspondence, and determinations.
- ❑ Prepare documentation for submission through required environmental review processes.

### Key Reminder:

- ⚠ • Environmental review and permitting must be completed before construction begins—starting early helps avoid delays and rework.

# Environmental Review Overview

Under the BEAD Program, grantees must complete environmental review requirements **before construction begins**. This review confirms compliance with NEPA and determines whether additional analysis or coordination is required.



- Grantees must comply with federal environmental laws **prior to receiving BEAD funds**.
- Environmental review is required for **ground-disturbing activities**.
- Incomplete NEPA planning may delay environmental clearance and construction start.

- Environmental clearance is required **before construction begins**.
- Review timelines depend on **project score, impacts, and documentation quality**.
- Early preparation supports **faster review and mobilization**.

- Clear project descriptions and mapped routes reduce review uncertainty.
- Well-prepared submissions minimize **clarification requests, rework, and resubmission**.
- **Accurate documentation supports predictable approval timelines**.

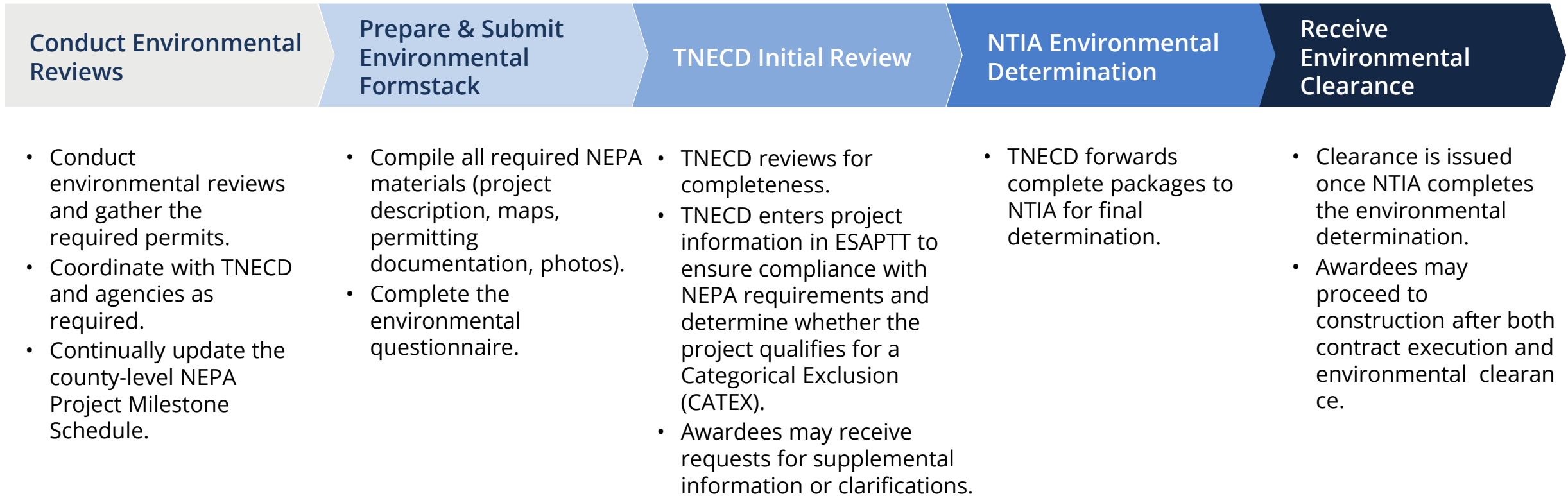
- Coordination with **local or state entities**, as applicable, based on project scope and permitting needs.
- Grantees should plan for **follow-up questions or supplemental materials**.
- Early coordination with internal teams and consultants improves responsiveness.

- Environmental review determines whether a project qualifies for **CATEX or requires further analysis based on project scope impacts**.
- Some projects may require **additional permits or agency coordination**.
- Mitigation measures may be required based on project impacts.

- Environmental clearance enables **construction mobilization**.
- Reduces compliance risk during **construction activities**.
- Establishes a strong foundation for **on-schedule project delivery**.

# NEPA Submission Process

This slide outlines the *typical* workflow for environmental review. Actual steps and timelines may vary depending on project scope, location, permitting needs, and consultation requirements.



## Key Submission Reminders

- ⚠ • Submit early and respond quickly to questions.
- Incomplete or incorrect submissions significantly delay clearance.
- Keep a copy of all submitted documentation for audit readiness.

# Environmental Questionnaire

## What is Required and What to Submit

Once environmental review activities are complete, grantees must submit an **Environmental Questionnaire Formstack** for each contracted area to support NTIA environmental review, clearance, and compliance determinations.

### 1. Project Overview

Grantees must provide a clear description of the proposed project, including:

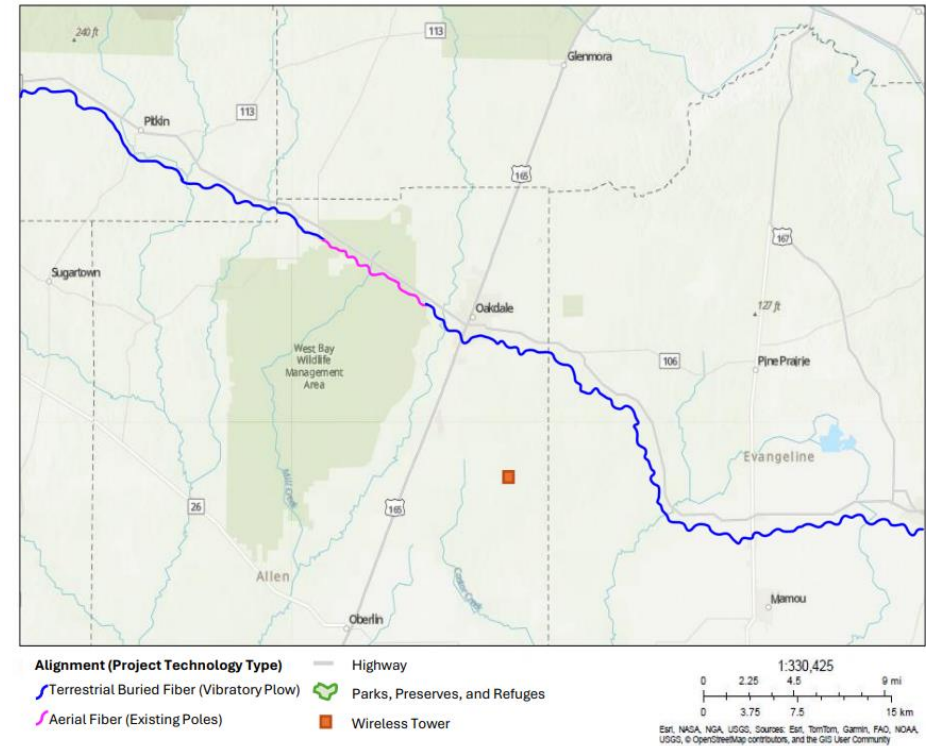
- Scope of work and construction activities
- Project location(s) and routes
- Anticipated ground-disturbing activities

### 2. Required Supporting Documentation

Grantees must upload documentation sufficient to evaluate environmental impacts, including:

- **Project Map**
  - Find sample maps and requirements in the [Sample Project Descriptions and Maps for BEAD EHP Review](#)
- **Environmental Questionnaire and supporting documents (Environmental & NEPA Materials).**
  - View questionnaire details in the [NEPA for BEAD Frequently Asked Questions](#)

EXAMPLE PROJECT DEPLOYMENT MAP



### Key Reminders

- ⚠️ **Submissions must be complete and accurate to avoid review delays or requests for clarification.**
- **Each contracted area requires a separate Environmental Questionnaire.**

# LEO Environmental Questionnaire

## *Environmental review requirements for Low Earth Orbit (LEO) BEAD projects*

BEAD-funded Low Earth Orbit (LEO) projects **may not require detailed NEPA, ESA, or Section 106 review** when no ground disturbance or infrastructure installation is proposed. To confirm eligibility, LEO grantees must submit a streamlined environmental questionnaire documenting project activities and confirming the absence of ground-disturbing work.

### 1. Project Overview

Grantees must provide a **brief description** of the LEO project, including:

- Scope and nature of activities
- General service area
- User terminal deployment approach

### 2. Required Attestations

Grantees must formally attest that the project **does not involve**:

- Trenching, boring, or fiber placement
- Installation of towers, poles, or similar structures
- Construction or improvement of **commercial satellite ground stations, earth stations, or teleports** to support last-mile services
- Disturbance to soil, vegetation, waterways, or existing infrastructure

### 3. Administrative Documentation

Grantees must submit documentation confirming that:

- User terminals will be installed **above ground**
- Installation activities are **minor and non-invasive**
- **No ground-disturbing construction** is proposed

#### Key Reminders

- If ground disturbance or infrastructure installation is **later identified**, the project may become subject to **additional environmental review requirements**.

# Project Description and Map Overview

A good project description is essential to all aspects of NEPA and permitting.



Describe what the project is (e.g., construction of a 150' monopole communication tower).



Describe where the project is proposed (e.g., 123 Main Street, Anytown, USA) and/or provide a detailed outline of the route the project will use.



Provide a physical description of 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), and provide maps and photographs.



Describe how the project will be implemented (e.g., requiring 1-acre of ground disturbance at an approximate depth of 5 feet, and the installation of a concrete pad, an equipment shed, and an emergency generator with a 1,000-gallon above-ground fuel storage tank).

# NEPA Project Milestone Schedule Requirement

One Environmental Questionnaire and one NEPA Project Milestone Schedule are required per county to support environmental review tracking and compliance monitoring.

## What is the NEPA Project Milestone Schedule?

- Required template outlining each county's NEPA-related planned submission dates.
- Helps TNECD verify environmental readiness at the county level.
- Must reflect realistic project timelines aligned with the awarded projects.

## County-Based Requirement (Key Rule)

- One environmental questionnaire is required per county.
- One NEPA Project Milestone Schedule is required per county.
- Each county submission must be completed separately and uploaded individually.

## Examples for Clarity

- 3 project areas in 1 county → 1 questionnaire + 1 schedule
- 2 project areas in County A + 1 area in County B → 2 questionnaires + 2 schedules
- 5 project areas across 5 counties → 5 questionnaires + 5 schedules

## Why This Requirement Matters

- Ensures NEPA review and milestones are tracked independently by county.
- Prevents review delays caused by mixed or incomplete submissions.
- Required for environmental clearance.



If a provider has multiple PAUs in the same county, they still submit **one environmental questionnaire and one milestone schedule** for that county.

# SHPO/THPO Review Requirements *(If Applicable)*

SHPO/THPO consultation under Section 106 of the National Historic Preservation Act (NHPA) is required only for BEAD-funded activities that constitute a federal undertaking and have the potential to affect historic properties. When required, consultation must be completed prior to construction authorization and may affect project timelines.

## When SHPO/THPO Review Is Required

- Required when a project may affect historic properties, archaeological sites, or tribal cultural resources.
- Typically triggered by ground disturbance, construction near historic assets, or work in sensitive geographic zones.
- Determined during NEPA review; not all projects require SHPO consultations.
- NTIA will initiate Tribal notifications, if required.

## Impacts on NEPA Timeline

- SHPO consultation, when required, typically adds approximately 30 days, but timing may vary.
- NEPA clearance cannot be finalized until all applicable consultations are complete.
- Incomplete or inaccurate submissions may result in additional review cycles.

## Awardee Responsibilities

- Follow instructions on the [TN SHPO Website](#) to initiate the Section 106 review process, identify and evaluate historic properties, and assess effects.
- Include a copy of [this memorandum](#) alongside the submission to the SHPO.
- TNECD will contact awardees if additional documentation or steps are needed due to impact on Tribal lands.

# Environmental Review Requirements: CATEX and ESA Overview

This slide provides a high-level overview of NEPA-related environmental review requirements for BEAD projects, with a focus on Categorical Exclusions (CATEX) and Endangered Species Act (ESA) considerations.

## When Categorical Exclusion (CATEX) Review is required

- Required when a project involves construction or installation activities that may impact land, water, wildlife, cultural resources, or the built environment.

## CATEX Requirements

- Confirm project activity is routine, minor, and low impact.
- Check that no sensitive environmental or historic issues exist.
- Maintain documentation supporting this conclusion.

## When Endangered Species Act (ESA) Section 7 obligations are required

- Every BEAD Project with ground disturbance must undergo an ESA review (at least a “no effect” determination).

## ESA Section 7 Requirements

- Use USFWS IPaC to generate a species list for the project area.
- Save the documentation to provide in the Environmental Questionnaire.
- Conduct any necessary field work to determine presence of habitat.
- TNECD will lead formal consultation if required.

# Federal Agency Permit Requirements

Depending on project location and impacts, additional federal permits or approvals may be required. This slide highlights common federal permitting scenarios that may apply to BEAD projects.

## Bureau of Land Management (BLM) — Right-of-Way (ROW)

### When required

- Broadband infrastructure placed on, under, or over BLM-managed federal land.

### Key actions

- Confirm whether the route crosses **BLM-managed land**.
- Submit **ROW application (SF-299)**, if applicable.
- Coordinate directly with the **local BLM field office**.

## U.S. Forest Service (USFS) — Special Use Permit

### When required

- Any **temporary or permanent use** of National Forest System (NFS) lands.

### Key actions

- Identify all project elements touching NFS land (fiber, poles, bores, staging areas, access routes).
- Contact the appropriate **USFS district office** and request a Special Use application meeting.
- Submit **Special Use Permit application (SF-299 package)**.

## Clean Water Act (CWA) Section 404 / Rivers & Harbors Act (RHA) Section 10

### When required

- Discharge of fill into **wetlands or streams**.
- Construction in **navigable waters or Waters of the U.S.**

### Key actions

- Determine whether activities occur **in, over, or under Waters of the U.S.**
- Identify the appropriate permit (typically a **Nationwide Permit**).
- Submit a **permit application or Pre-Construction Notification (PCN)**, as required.



Federal permits are **location- and impact-specific**. Early route review and coordination with federal agencies helps avoid NEPA delays and construction hold-ups.

# Less Common Federal Permits – 1/2

Some BEAD projects may require additional federal permits based on location and site-specific impacts. The examples below illustrate less common permitting scenarios.

## National Park Service (NPS) Right-of-Way (ROW)

### When required

- Broadband infrastructure placed on, under, over, or across NPS-managed land

### Key actions

- Confirm whether the route crosses NPS land
- Coordinate with the appropriate NPS unit
- Submit an NPS ROW application, if required

## U.S. Fish & Wildlife Service (USFWS) Special Use Permit / ROW

### When required

- Project uses or crosses USFWS-managed land (wetland management districts, national wildlife refuges, national fish hatcheries)

### Key actions

- Identify whether the route touches USFWS-managed land
- Coordinate with the Refuge or Ecological Services Office
- Submit a USFWS Special Use Permit application, if required

## Army Corps of Engineers (USACE) Section 408

### When required

- Project alters or affects a federally authorized civil works project (levee, floodwall, navigation channel, dam, or other USACE-controlled flood-risk-management infrastructure)

### Key actions

- Determine whether the project touches a USACE-authorized feature
- Coordinate with the appropriate USACE District

# Less Common Federal Permits – 2/2

## Clean Water Act (CWA) — Section 401

### When required

- If a project requires a USACE permit for work in wetlands, streams, rivers, or other jurisdictional waters, a Section 401 water quality certification (or waiver) is also required from the state authority

### Key actions

- Determine whether Section 401 applies
- Submit certification request to the state
- Provide proof of certification or waiver

## Bureau of Reclamation (BOR) — ROW Authorization

### When required

- Required when a project touches Reclamation land, crosses a Reclamation facility, or uses a Reclamation easement or canal corridor, a BOR ROW authorization is required.

### Key actions

- Determine whether BOR ROW authorization is required
- Contact the local BOR Area Office
- Participate in pre-application coordination, if needed

## Bureau of Indian Affairs (BIA) ROW

### When required

- Required when a project proposes to place broadband infrastructure on, under, over, across, or through Indian trust land or restricted fee land where BIA has approval authority.

### Key actions

- Grantees must identify whether any portion of the project footprint touches trust or restricted land.
- If applicable, confirm whether the Tribe has HEARTH Act authority to issue ROWs independently. BIA authorization is required unless a HEARTH program exists.

# State Permits

Common state and local permits that may be required based on construction methods and project location. State and local permit requirements vary by jurisdiction and construction method and must be confirmed prior to construction.

Agency Name	Division or Department	Permit Name	Permit Details
Tennessee Department of Transportation (TDOT)	Utilities Division	Use and Occupancy Permit (Fiber Optic on Freeways)	TDOT issues ROW occupancy permits for trenching, boring, or aerial fiber on state-maintained roads. Local municipalities and counties also require ROW permits for their roads.
Tennessee Dept of Environment and Conservation (TDEC)	Division of Water Resources	Hydrologic Determination (HD)	Determine whether a watercourse is legally classified as a stream or a wet weather conveyance (WWC) under Tennessee law.
Tennessee Dept of Environment and Conservation (TDEC)	Division of Water Resources	Aquatic Resource Alteration Permit (ARAP)	Fiber trenching or boring under waterways triggers these permits.
Tennessee Dept of Environment and Conservation (TDEC)	Division of Water Resources	Section 401 Water Quality Certification	When a project involves any discharge of dredged or fill material into waters of the United States/ Often paired with ARAP for projects affecting waters of the state.
Tennessee Dept of Environment and Conservation (TDEC)	Division of Water Resources	Tennessee Construction Stormwater General Permit	If your construction activities involve disturbing one acre or more of soil (e.g., trenching for underground fiber).
Railroad companies (various)	-	Railroad Crossing Permits	Fiber crossing railroad ROW.
Local electric cooperatives, municipal utilities, or private pole owners	Governed by FCC rules and Tennessee Valley Authority (TVA) agreements for co-op areas.	Utility Pole Attachment Permit	Using existing utility poles for aerial fiber.

# Local Permits & Private Authorizations

How grantees **identify and secure** non-federal approvals required to support construction activities.

## Required Steps:

- Identify all applicable jurisdictions along the project route.
- Determine local permitting requirements through local coordination.
- Secure required easement and access agreements.
- Coordinate with utilities and quasi-public entities.
- Confirm approvals before construction begins.

# Common Documentation Issues

Frequent errors that delay NEPA review and environmental clearance:

## Incomplete or Incorrect Project Descriptions

- Missing details about construction methods, disturbance areas, or route alignment.
- Descriptions that do not match the maps or engineering drawings submitted.
- Lack of clarity around where ground disturbance will occur.

## Missing or Inaccurate Maps & Location Data

- Maps that do not clearly show project routes or service areas.
- Maps that lack sufficient context to understand location, boundaries, or impacted areas.
- Inconsistencies between maps and other submitted project materials.
- Use of outdated, incomplete, or conflicting location files across attachments.

## Missing Supporting Documentation

- Documentation provided does not sufficiently support the proposed project scope or environmental conditions.
- Required attachments are omitted, outdated, or inconsistent with other submitted materials.

## Slow or Incomplete Responses to Follow-Up Requests

- Awardees not responding promptly to TNECD or NTIA clarification needs.
- Responses missing requested supplemental information.
- Delays causing projects to fall behind key milestone dates.



**Most delays are preventable — complete, accurate, correctly formatted documentation accelerates environmental clearance.**

# Environmental Clearance & Next Steps

Construction activities may **not** begin until formal environmental clearance is issued.

## What Environmental Clearance Confirms

- NEPA review and any required consultations and permit approvals are fully complete.
- The project meets all federal environmental compliance standards.
- Awardees may begin construction **only after** contract execution AND environmental clearance are both complete.

## What Awardees Can Begin After Contract Execution (Pre-Construction)

- **Prepare construction mobilization plans and staffing schedules.** (*construction may not begin until environmental clearance is issued.*)
- **Begin procurement planning and materials coordination aligned with the approved project scope.** (*aligned with approved project scope and contract terms*)
- **Establish documentation and tracking processes for reimbursement and quarterly reporting.** (*reporting, invoicing, and monitoring begin post-contract and continues throughout the project lifecycle*)

## Awardee Responsibilities During Construction

- **Follow approved routes, construction methods, and mitigation measures** identified through the NEPA review.
- **Maintain complete and accurate project records,** including invoices, proof of payment, and construction progress documentation.
- **Notify TNECD immediately of any material changes** to project scope, location, construction methods, or environmental conditions, and **respond promptly to TNECD information requests.**

## How Environmental Clearance Impacts Project Timeline & Reporting

- Clearance marks the transition from construction planning to execution and keeps the project aligned with BEAD milestones.
- Construction activity can now be captured in quarterly reporting cycles.
- Early clearance helps avoid downstream delays tied to reimbursement and milestone tracking.

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## 3. Contracting

# Anticipated Timeline

All dates below are tentative.

**Grantees submit their ILOCs or performance bonds to TNECD.**

*This requirement must be complete prior to contracting*

**Final Proposal Approval**  
*January*

**Grant Committee**  
*February*

**Intent to Award Letter**  
*February*

**Contracting**  
*Spring*

- TNECD expects our Final Proposal to be approved by the end of this month.
- Once approved, we will send an email to all grantees.

- All awards must go through Grant Committee before TNECD can issue an intent to award letter.

- TNECD will issue an intent to award letter with finalized details for each contracted area.

- Contracts will be shared with grantees in spring.
- When returning signed contracts, grantees must include a *Protecting BEAD from Defaults* certification.

# Protecting BEAD from Defaults Certification

Required certification to confirm project financial viability and compliance with NTIA BEAD conditions.

Purpose of the Certification	Subgrantee Preparation Requirements	Submission & Formatting Requirements	Key Compliance Implications
<ul style="list-style-type: none"> <li>Required by NTIA under the BEAD Program's "Protecting the BEAD Program from Defaults" condition.</li> <li>Confirms the Subgrantee <b>did not rely on speculative or additional federal broadband funding</b> when proposing its BEAD project.</li> <li>Certifies the Subgrantee <b>will not seek or accept additional federal broadband deployment or operational funds</b> to serve BEAD-funded locations during the project's period of performance.</li> <li>Supports program integrity and long-term sustainability of BEAD-funded networks.</li> </ul>	<ul style="list-style-type: none"> <li>Prepare the certification on <b>official organizational letterhead</b>.</li> <li>Use the <b>required certification language</b> provided by TN ECD.</li> <li>Complete all required project and contact fields.</li> <li>Certification must be signed and dated by the <b>Authorized Organization Representative (AOR)</b>.               <ul style="list-style-type: none"> <li>Electronic/digital signatures are acceptable.</li> <li>A wet signature is <b>not required</b>.</li> <li>The AOR must have authority to bind the Subgrantee and its affiliates.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Convert the signed certification into a machine-readable PDF:               <ul style="list-style-type: none"> <li>Export directly from Word or a PDF tool (not a scanned image).</li> <li>Text must be searchable/selectable.</li> </ul> </li> <li>Use the required file naming convention: <b>[UEI]_[SubgranteeName]_TNDefaultsCertification.pdf</b></li> <li>Submit the certification alongside the signed BEAD subgrant agreement, as part of the contract return package.</li> </ul>	<ul style="list-style-type: none"> <li><b>BEAD funds cannot be released</b> until this certification is received.</li> <li>Certification must be submitted as a <b>stand-alone PDF</b>.</li> <li>Certification may be <b>published by NTIA</b>.</li> <li>Applies only to <b>BEAD-funded locations</b> (does not restrict participation in non-BEAD or non-federal programs).</li> </ul>

**⚠ BEAD funds cannot be released, and reimbursement eligibility may be delayed, until this certification is received.**



# Contracting FAQs

## Does ECD have a requirement for subcontractors to be approved before construction begins?

- No, ECD does not require pre-approval of subcontractors at any point during the BEAD performance period.
  - Milestone-based grantees should acquire subcontractors in accordance with their own internal procurement policies and procedures.
  - Monitoring for traditional reimbursement grantees will involve a review of adherence to procurement requirements, including subcontractors.
  - All organizations must ensure that all required BEAD-program flow-down provisions are incorporated into any subcontract agreements.

## Can we begin purchasing?

- Yes, grantees may begin project spending at their own risk. Any costs incurred before Final Proposal approval will not be reimbursed if the project is not approved.
  - All costs must occur on or after November 1, 2024.
  - Please remember to follow procurement requirements as it relates to your organization's payment method.

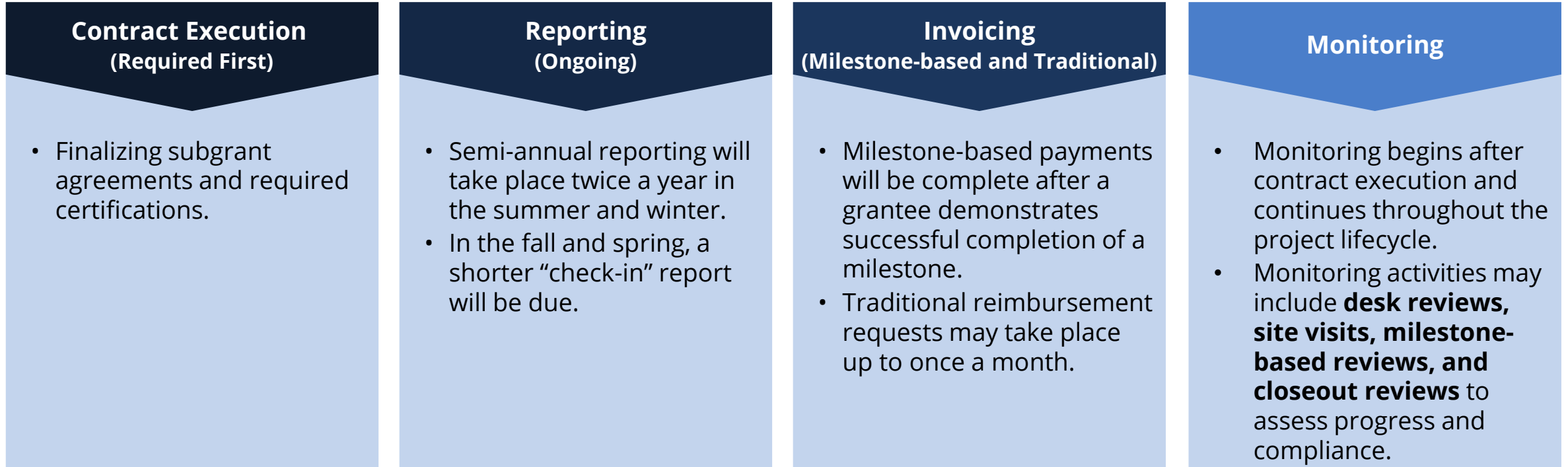
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# 4. High-Level Post-Award Overview (What's Coming Next)

# Post-Award Overview: What Comes After Contracting

A high-level look at post-award activities that follow environmental readiness and contracting. Once contracts are executed, reporting, invoicing, and monitoring begin and continue throughout the project lifecycle.

Post-Award activities begin after contract execution and occur as outlined below:



**Key Reminder:**

- Detailed post-award requirements, reimbursement processes, and reporting guidance will be covered in a separate post-award office hour.

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## **5.** Key Environmental Resources & Tools

# Environmental Screening & Permitting Tools

Tools commonly used by awardees to screen environmental impacts, identify permitting triggers, and support BEAD environmental compliance.

Link	Overview
<a href="#">NEPA for BEAD Frequently Asked Questions</a>	Answers key environmental questions, including subgrantee and ESAPTT requirements
<a href="#">NTIA Permitting Resources</a>	NTIA-provided resources and mapping tool that provides guidance on permits typically required for infrastructure deployment and related requirements of the BEAD program
<a href="#">USFWS IPaC Tool - Endangered Species Screening</a>	Determines what impacts to sensitive natural resources are likely to occur from the project and provides suggestions for addressing them
<a href="#">FEMA Flood Map Service Center</a>	Identifies floodplains
<a href="#">USFWS Wetlands Mapper</a>	National Wetlands Inventory map that is used to screen for Clean Water Act/Section 404 triggers
<a href="#">Section 106 Review</a>	Steps to complete Section 106 Review for SHPO

# Key TNECD Resources & Links

Essential guidance, documentation, and tools for awardees.

TNECD BEAD Program Homepage	BEAD Application Guidebook (Tennessee)	NTIA BEAD Federal Program Resources	NEPA & Environmental Resources	TNECD BEAD Challenge Map
<ul style="list-style-type: none"><li>TNECD's central resource page with program guidance, maps, and foundational documents for Tennessee's BEAD rollout.<ul style="list-style-type: none"><li><a href="#">TNECD BEAD Program Resources.</a></li></ul></li></ul>	<ul style="list-style-type: none"><li>State-specific BEAD application and program guidance (pdf).<ul style="list-style-type: none"><li><a href="#">Tennessee BEAD Guidebook (Version 2.1)</a></li></ul></li></ul>	<ul style="list-style-type: none"><li>Federal-level program portal with NEPA resources, policy notices, and technical assistance tools.<ul style="list-style-type: none"><li><a href="#">NTIA BEAD Program Resources (BroadbandUSA)</a></li></ul></li></ul>	<ul style="list-style-type: none"><li>Link to national NEPA-related guides, tools, and background that underlie environmental review expectations.<ul style="list-style-type: none"><li><a href="#">NTIA NEPA for BEAD &amp; Environmental Tools</a></li></ul></li></ul>	<ul style="list-style-type: none"><li>Interactive map of BEAD Project Area Units and locations (useful reference for environmental and deployment decisions).<ul style="list-style-type: none"><li><a href="#">Tennessee BEAD Challenge Map</a></li></ul></li></ul>

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## 6. Q&A



Thank you!

Please email

[ECD.Broadband@tn.gov](mailto:ECD.Broadband@tn.gov)

with any additional questions

# How to Stay on Track With Environmental Requirements

Best practices for maintaining compliance and avoiding delays during environmental review and clearance.

## 1. Start NEPA Preparation Immediately

- ❑ Begin gathering project descriptions, maps, and supporting documentation as soon as awards are announced.
- ❑ Complete the NEPA Project Milestone Schedule early for each county.
- ❑ Hold internal kickoff meetings to align teams on responsibilities and timelines.

## 2. Ensure Documentation Quality & Accuracy

- ❑ Double-check that descriptions match maps, routes, and engineering plans.
- ❑ Use TNECD- or NTIA-provided templates and required file formats, where applicable (e.g., environmental questionnaire, milestone schedule).
- ❑ Submit **clear, legible supporting materials**, such as maps, checklists, and other documentation **required for the project's review pathway**.

## 3. Respond Quickly to TNECD Requests

- ❑ Assign a point person to monitor communications and track follow-up items.
- ❑ Provide complete responses to requests for clarification or supplemental materials.
- ❑ Early responsiveness prevents extended review cycles.

## 4. Coordinate Internally Across Teams

- ❑ Keep engineering, environmental consultants, finance, and compliance aligned on NEPA deliverables.
- ❑ Maintain shared internal documentation repositories to reduce errors.
- ❑ Schedule regular check-ins to stay ahead of submission milestones.

## 5. Maintain Clear Records for Audit Readiness

- ❑ Save copies of all uploaded materials and correspondence.
- ❑ Keep documentation organized by county and project area.
- ❑ Record any changes or updates to project plans that may affect NEPA.



# Environmental Readiness Checklist (High-Level)

Key items grantees should confirm before initiating construction activities.

- ❑ NEPA pathway confirmed
  - Appropriate NEPA determination identified and documented
- ❑ Environmental screening completed
  - ESA, wetlands, floodplains, cultural/historic considerations reviewed
- ❑ Required permits identified
  - Federal, state, local, and private approvals assessed along the full route
- ❑ Agency and landowner coordination initiated
  - Early outreach completed where approvals or consultations are required
- ❑ Environmental documentation prepared
  - Screening results, correspondence, and determinations retained and ready for submission

**Key Reminder:**

 • Environmental readiness confirms a project is cleared to build—construction should not begin until these items are addressed.

# Common Environmental Readiness Gaps That Cause Delays

Issues that frequently slow environmental review or postpone construction start.

## Common Readiness Gaps to Avoid:

### Starting construction before environmental clearance

- Ground disturbance or installation begins before NEPA or permit approvals are complete.

### Late identification of required permits

- Federal, state, local, or private approvals identified too late in the process.

### Incomplete environmental submissions

- Missing documentation, outdated screenings, or inconsistent project information.

### Delayed agency or landowner coordination

- Outreach initiated only after designs are finalized or construction is scheduled.

### Underestimating review timelines

- Assuming approvals will be quick without confirming agency timelines.

#### Key Reminder:



- Most environmental delays are preventable with early screening, coordination, and complete documentation.