National Environmental Policy Act (NEPA) Tiered Environmental Assessment Guidance and Template

April 2025





U.S. Department of Commerce
National Telecommunications and Information Administration



Instructions for Use of this Guidance and Template

The National Telecommunications and Information Administration (NTIA) issuing this guidance and tiered environmental assessment (EA) template to promote consistency and efficiency across NTIA broadband grant program National Environmental Policy Act (NEPA) reviews.

The purpose of this document is to enable Grantees and their NEPA professionals responsible for preparing draft NEPA documents (referred to together in this document as Grantees) to prepare project-specific tiered draft EAs that rely on the First Responder Network Authority (FirstNet Authority) 2017 *Regional Programmatic Environmental Impact Statements* (PEISs) for broadband deployment projects, which NTIA adopted in 2024.

Each Grantee should take the following four steps:

- 1. Before beginning the tiered EA drafting process, review and familiarize yourself with the regional PEIS for your state or territory and its environmental analyses.
- 2. Before drafting, review and familiarize yourself with NTIA's <u>April 2024 NEPA compliance</u> guidance, which includes general procedures for NTIA EAs.
- 3. Before drafting, consult with your NTIA Environmental Program Officer to discuss any initial issues, including template version control and whether you will need to use or develop any state-specific supplemental PEIS information for your tiered EA.
- 4. When drafting, modify and tailor the tiered EA template as appropriate to meet your specific
- 5. project needs and legal requirements.

Nothing in this guidance and template should be interpreted to override the requirements of NEPA, 42 U.S.C. § 4321 *et seq.* Grantees should adhere to the text of NEPA in the event of any real or perceived conflict between the template and the statute. NTIA will periodically review and update this guidance and template to ensure it meets current NEPA requirements.

Template Font Key

Grantees should tailor draft EAs to specific project needs and legal requirements, as appropriate, based on the following:

- Italicized purple font = guidance language that Grantees should review and follow as appropriate but delete from the document before submitting draft EAs to NTIA.
- Green font = language relating to identifying effects on state-designated resources that Grantees may include to meet federal and state requirements in a single EA.
- Normal font = template text that may be used as-is but that Grantees should modify as appropriate for specific project requirements.



 [Bracketed text] = placeholders where Grantees should include project-specific language. Grantees should address all placeholders before submitting draft EAs to NTIA for review.

Page Limit

NEPA limits EAs to 75 pages. Therefore, Grantees should focus on conciseness when drafting. In addition, NTIA will not count the following items against the 75-page limit:

- Cover page
- Table of contents
- List of acronyms
- Citations
- Explanatory maps, diagrams, graphs, tables, figures, or other means of graphically displaying quantitative or geospatial information
- List of references
- List of preparers
- Appendices

Resource Areas

Section 3 of the tiered EA template allows Grantees to describe the affected environment and the environmental consequences for each resource area in table format. The order of the resource areas in the table corresponds to the regional PEISs.

Using this format, Grantees should complete Section 3 of tiered EAs with the appropriate level of detail to fully address the potential environmental effects of proposed projects on each resource area. In general, Grantees should include additional analysis where effects on a resource area may be more significant, sensitive or controversial.

Style and Format

NTIA encourages Grantees to consult the *Chicago Manual of Style* for guidance on style, grammar, capitalization, language, and formatting and to use the embedded Styles within this Word document. Grantees also should plan for compliance with Section 508 of the Rehabilitation Act (see https://www.section508.gov) early in the drafting process. Grantees should tailor the template's List of Acronyms to their projects and ensure they define acronyms at first use and throughout EAs as appropriate.

Measurements and Figures

Metric conversions of English units are not required, but Grantees should ensure consistent use of commonly accepted units for given measurements. Grantees also should use significant figures (see



NTIA – Tiered Environmental Assessment Guidance – April 2025

https://www.britannica.com/science/significant-figures) and consider rounding up numbers for readability (e.g., by stating "approximately 1 acre" instead of "0.915 acre").



National Telecommunications and Information Administration

Environmental Assessment

[Grant Recipient Name (award number)]

[Project Name]

[Project Location City, County, State]

[If a wireless telecommunication tower, include latitude and longitude]

For further information, contact:

[Name] [Address] [Telephone] [Email]



Table of Contents

1	Exec	utive Summary	Error! Bookmark not defined.
2	Intro	duction	1
	2.3	Relevant Laws, Regulations, and Permits	Error! Bookmark not defined.
	2.4	Public and Agency Participation and Intergovernmental	Coordination3
3	Prop	osed Action and Alternatives	
	3.1	Proposed Action	2
	3.2	No Action Alternative	5
	3.3	[Other] Action Alternative(s) [Optional]	Error! Bookmark not defined
	3.4	Alternatives Considered but Eliminated	Error! Bookmark not defined
4	Affe	cted Environment and Environmental Impacts	
5	Cun	ulative Impacts	26
6	App	icable Environmental Permits and Regulatory Requireme	nts Error! Bookmark not defined
7	List	of Preparers	30
8	Refe	rences	31
Ta	ble		
Tab	le 3-1	. Affected Environment and Environmental Effects of the	Proposed Action
		. Comparison of the Action Alternatives	
Tab	le 4-1	. Present and Reasonably Foreseeable Future Actions	26
Tab	le 5-1	. Relevant Laws, Regulations, and Permits	28
		. List of Preparers	
Tab	le B-1	. Federally and State-Listed Species in the Project Area	36

Figures

Below are examples of figures that Grantees should consider including in the body of the EA or appendices based on project-specific needs.

- Project Location and Vicinity Map
- Route Map
- Staging Areas
- Temporary Impact and Access Maps
- Phasing Map
- Site Plan
- Aerial Photographs
- Site Photographs
- National Wetlands Inventory Map
- Geologic Map
- Historic Sites Map
- Topographic Map (include USGS Quadrangle Names)
- Endangered Species Action Area Map



i

Appendices

The template includes sample appendices for Figures, Biological Consultation and Information, and Cultural Resources Information. Grantees should modify or add to the appendices as appropriate and consider including the following example types of supporting information in the appendices based on project-specific needs.

- 1. Infrastructure Map
- 2. Project-specific SSURGO Data/Map
- 3. NRCS Correspondence on Prime Farmland Conversion
- 4. Paleontological Monitoring and Mitigation Plan
- 5. Federal/Tribal Lands and State Lands Map
- 6. Recreational Area Map
- 7. Biological Evaluation or Assessment
- 8. Re-vegetative Plans and Seed Mix Descriptions
- 9. Eagle Nest Mapping
- 10. Cultural and Heritage Resources Map
- 11. Cultural Resources and Architectural Report
- 12. SHPO/Tribal Correspondence
- 13. Unanticipated Discovery Plan
- 14. Floodplains Map
- 15. Wetlands Map
- 16. Wetlands Summary Reports
- 17. Surface Water Features Map
- 18. Sensitive/Impaired Waters and Sole Source Aquifers Map
- 19. USACE Permitting Documentation
- 20. Contaminated Sites and Public Hazards Map/Data
- 21. USEPA Air Quality Attainment/ Nonattainment Maps
- 22. Monitoring Plan(s)/Site Avoidance Plan(s)
- 23. Construction Best Management Practices

List of Acronyms

Grantees should tailor the EA's List of Acronyms to their projects and ensure they define acronyms at first use and throughout EAs as appropriate.

ACHP Advisory Council on Historic Preservation

APE Area of Potential Effect
AQCR Air Quality Control Region

BEAD Broadband Equity, Access, and Deployment (Program)

BGEPA Bald and Golden Eagle Protection Act

BIA Bureau of Indian Affairs

BIP Broadband Infrastructure Program

BMP best management practice



ii

CAA Clean Air Act

CE categorical exclusion

CEQ Council on Environmental Quality

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

C.F.R. Code of Federal Regulations

CWA Clean Water Act

CZMA Coastal Zone Management Act
dBA Decibels on the A-weighted Scale
DOC U.S. Department of Commerce
EA environmental assessment

EFH essential fish habitat

E.O. Executive Order

ESA Endangered Species Act

FAA Federal Aviation Administration

FCC Federal Communications Commission
FEMA Federal Emergency Management Agency
FirstNet Authority First Responder Network Authority

FONSI finding of no significant impact

Fed. Reg. Federal Register

GAP gap analysis project

HAP hazardous air pollutant

HAPC habitat area of particular concern
HDD horizontal directional drilling

IBA important bird area

IPaC Information for Planning and Consultation

IR inadvertent release
MBTA Migratory Bird Treaty Act

MM Middle Mile (Broadband Infrastructure Program)

MMPA Marine Mammal Protection Act

MSFCMA Magnuson-Stevens Fishery Conservation and Management Act

NAAQS National Ambient Air Quality Standards

NAGPRA Native American Graves Protection and Repatriation Act

NBAM National Broadband Availability Map
NEPA National Environmental Policy Act
NFIP National Flood Insurance Program
NHD National Hydrography Dataset
NHPA National Historic Preservation Act

NIST National Institute of Standards and Technology

NMFS National Marine Fisheries Service

NOAA National Oceanic and Atmospheric Administration
NPDES National Pollutant Discharge Elimination System

NPS National Park Service

NPSBN Nationwide Public Safety Broadband Network
NRCS Natural Resources Conservation Service
NRHP National Register of Historic Places



iii

NTIA National Telecommunications and Information Administration

NWI National Wetlands Inventory

OSHA Occupational Safety and Health Administration

PC Program Comment for Federal Telecommunications Projects

PEIS programmatic environmental impact statement

PEM palustrine emergent wetland
PFO palustrine forested wetland
PGA peak ground acceleration

POP point of presence

PSD Prevention of Significant Deterioration
PSS palustrine scrub-shrub wetland
PUB palustrine unconsolidated bottom

PUC Public Utility Commission

RCRA Resource Conservation and Recovery Act
RF EME radio frequency electromagnetic energy

ROD record of decision ROW right-of-way

SGCN Species of Greatest Conservation Need SHPO State Historic Preservation Office

SIP State Implementation Plan
SOP standard operating procedures

SPL sound pressure level

SSURGO Soil Survey Geographic Database
SWPPP Stormwater Pollution Prevention Plan
TBCP Tribal Broadband Connectivity Program
THPO Tribal Historic Preservation Office

TMDL total maximum daily load

U.S. United States
U.S.C. U.S. Code

USACE U.S. Army Corps of Engineers
USDA U.S. Department of Agriculture
USDOT U.S. Department of Transportation
USEPA U.S. Environmental Protection Agency

USFS U.S. Forest Service

USFWS U.S. Fish and Wildlife Service

USGS U.S. Geological Survey

WCS Wetlands Classification Standard

WOTUS waters of the U.S.



iν

1 Introduction

The Consolidated Appropriations Act of 2021 and the Infrastructure Investment and Jobs Act of 2021 appropriated \$49.8 billion for the National Telecommunications and Information Administration (NTIA) to bring broadband service to unserved and underserved locations across the United States through its broadband grant programs, which include the Broadband Equity, Access, and Deployment (BEAD) Program, the Middle Mile Deployment Grant Program (MM), and the Tribal Broadband Connectivity Program (TBCP). The IFA grant programs will expand access to high-speed internet by funding infrastructure deployment in all 50 states, five territories, and the District of Columbia.

[Grantee] is proposing to construct [identify the general project type, such as a new tower or new buried broadband fiber] as the [recipient/subrecipient] of a grant from NTIA under the [specify IFA program], as part of award number [add award number]. The [Project name] or "Project" would [briefly summarize the Project details and size], and would be located in [county/parish, state] (see Appendix A for figures representing the Project area and components).

NTIA is the lead federal agency responsible for evaluating the Project under the National Environmental Policy Act (NEPA). [For BEAD projects: In addition, the [state agency] is considered the Eligible Entity under the BEAD Program and is serving as a joint lead agency with NTIA under NEPA.]

In 2024, NTIA adopted the five Regional Programmatic Environmental Impact Statements (PEISs) that the First Responder Network Authority (FirstNet Authority) issued in 2017 under NEPA for broadband deployments associated with the National Public Safety Broadband Network (NPSBN).¹ The PEISs contain detailed environmental analyses of the potential environmental effects of various telecommunications deployment methods in all states and territories, including:

- Collocation of network equipment on existing towers, poles, and structures;
- New construction of towers, poles, and associated structures (including generators, equipment sheds, fencing, and concrete pads);
- Use of existing fiber facilities, including lighting up dark fiber and installation of new fiber on new and existing poles in existing conduit;
- Installation of new conduit and fiber using trenching (including vibratory plowing) or directional boring (including horizontal directional drilling (HDD));
- Satellite deployments;
- Installation of microwave facilities for cell-site backhaul communication; and
- Utilization of deployable technologies.

In its Records of Decision adopting the PEISs, NTIA confirmed that the PEISs remain valid and provide relevant and adequate assessments of the potential environmental effects and benefits of IFA grant

¹ See FirstNet Authority, Regional PEISs, https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements.



_

funded projects.²

This site-specific environmental assessment (EA) tiers off of the [cite the applicable regional] PEIS by summarizing and incorporating by reference the analyses from the PEIS where appropriate. The EA states NTIA's purpose and need for proposed action below. Section 2 of the EA describes the Project and alternatives to the Project. Section 3 of the EA analyzes the affected environment and the environmental consequences of the Project and the alternatives. Section 4 evaluates potential cumulative effects. Section 5 lists relevant laws, regulations, and permits required for [Grantee] to implement the Proposed Action.

In accordance with the [applicable regional] PEIS and based on site-specific analysis, the EA concludes that the effects of the Project would be less than significant with incorporation of best management practices (BMPs) and mitigation measures, where appropriate.

1.1 Purpose and Need

NTIA's IFA grant programs are part of a nationwide effort to make high-speed internet service available to all Americans, including by: 1) connecting students to quality education and training; 2) enabling businesses to more readily connect to consumers, increasing sales and creating jobs; 3) increasing accessibility to telehealth services; 4) connecting the public to services, first responders, elected officials, and their communities; and 5) increasing workers' access to job opportunities and skills development.

Choose relevant paragraph:

[The Broadband Equity, Access, and Deployment (BEAD) Program provides \$42.45 billion to expand high-speed internet access by funding planning, infrastructure deployment, and adoption programs in all 50 states, Washington D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.]

or

[The Middle Mile Grant Program provides funding for the expansion and extension of middle mile infrastructure across U.S. states and territories. In total, the program allocated \$980 million to fund projects for the construction, improvement, or acquisition of middle mile infrastructure covering more than 370 counties across 40 states and Puerto Rico in Summer 2023. The ultimate purpose of this funding is to expand and strengthen U.S. high-speed internet networks by reducing the cost of connecting unserved or underserved areas to the internet backbone.]

or

[The Tribal Broadband Connectivity Program (TBCP) is a \$3 billion program directed to tribal governments to be used for broadband deployment on tribal lands, as well as for telehealth, distance learning, broadband affordability, and digital inclusion.]

Add the Project-specific purpose and need:

² See NTIA, Records of Decision Adopting FirstNet Authority Regional PEISs, https://broadbandusa.ntia.gov/taxonomy/term/371.



The proposed Project evaluated in this EA would further the goals of the [specify relevant IFA program] by [explain in a few sentences how the Project would further the goals of the relevant IFA program, i.e., state the broadband deployment issues the Project would address in the context of the communities the IFA program is intended to serve].

1.2 Agency Participation [if Tribal involvement: and Intergovernmental Coordination]

NTIA [and joint lead agency, if applicable] prepared this EA to identify and assess the reasonably foreseeable environmental effects of the Project and alternatives, facilitate public involvement and informed agency decision-making, and recommend appropriate mitigation measures.

[Identify cooperating agencies, participating agencies, or other organizations participating in the NEPA process, if any. If necessary, briefly describe the specific role of each agency or organization.] The EA provides a basis for coordinated [federal, state, and local, as applicable] input, review, and decision-making in a single document.

1.3 [If NTIA issues the EA for Public Comment: Public Involvement]

The EA was issued for a 30-day public comment period from [date] to [date]. The EA responds to public comments received where noted in the text.



2 Proposed Action and Alternatives

2.1 Proposed Action

Note: the proposed Project design must be as complete as possible for NTIA to be able to adequately analyze potential environmental effects. Although the Project design may incorporate a reasonable degree of flexibility to accommodate field changes during deployment, substantial changes to the Project design or scope during or after the NEPA process could lead to delays in NTIA approval or require the Grantee and NTIA to conduct additional analysis.

Provide a detailed Project description that includes the following three elements:

- 1) A physical description of the Project area, including:
 - total Project area (including construction corridors);
 - total Project length;
 - total amount of ground that would be disturbed;
 - the need for/use of easements, staging areas, or access roads; and
 - whether the Project would cross or occur in close proximity to any tribal or federal lands, such as lands managed by the National Park Service, Forest Service, Fish & Wildlife Service, Bureau of Indian Affairs, Bureau of Land Management, Bureau of Reclamation, or Army Corps of Engineers.
- 2) A description of the Project construction methods, including:
 - for each Project component or installation, whether construction would involve use of existing infrastructure or new infrastructure, and the location and extent of any ground disturbance;
 - equipment and materials to be used;
 - any percussive activities;
 - use of lighting, specifying location and type;
 - the need for any tree or vegetation clearing or trimming (and if needed, clarification on the size or maturity of trees with the potential to be cut);
 - construction timing, specifying time of year and time of day/night.
- 3) A Project map or maps delineating Project and property boundaries and relevant affected areas—maps may include:
 - a vicinity map with address and latitude/longitude in decimal degrees;
 - aerial and topographic maps depicting Project location or route and differentiating between construction type (e.g., aerial versus subsurface); and
 - site plans plan view, typical cross-sections, and engineering specifications.



2.2 [Other Action Alternative] [If Applicable]

NEPA requires NTIA to consider a reasonable range of alternatives that are technically and economically feasible and meet the purpose and need. In some instances, an IFA grant application may pose more than one such action alternative that should be included in the EA, or agencies or stakeholders may request other action alternatives. Reasonable alternatives may include different siting options (e.g., different tower locations or fiber routes) or differences in construction or deployment (e.g., wireless deployment or aerial fiber).

If the EA includes one or more other action alternatives, include a statement in Section 2.1 identifying the Proposed Action as the "Preferred Action Alternative." In this subsection 2.2 and additional subsections for each other action alternative, as needed, describe the other action alternatives in similar detail to the Preferred Action Alternative and identify the similarities or differences between them based on the three elements in Section 2.1 (physical description of project area, description of project, and project map, as appropriate).

In addition to the Preferred Action Alternative, [Grantee] identified the [name of other action alternative] based on the need to consider [summarize the reason for the alternative, such as a different source point for the broadband connection, aerial or wireless deployment instead of buried fiber, or consideration of another suitable site for a tower]. The [name of alternative] would include the following components: [describe the alternative]. The EA evaluates the potential environmental effects of the [name of alternative] in Table [3-2] and considers the cumulative effects of the alternative in Section 4.

2.3 Alternatives Considered but Eliminated

NTIA may consider an alternative but eliminate it from further analysis under NEPA if it would not be technically or economically feasible or if it would not meet NTIA's purpose and need.

If the EA <u>only</u> evaluates the Proposed Action and the No Action Alternative, include the following statement:

NTIA's review identified the Proposed Action as the only alternative that would be [technically or economically feasible / meet the purpose and need] because [briefly indicate why]. Therefore, the EA only evaluates the Proposed Action and the No Action Alternative.

If the EA considered but eliminated one or more alternatives from detailed analysis, briefly describe the alternatives that were considered (particularly during Project development), but not carried forward for detailed analysis. Reasons for not being carried forward include not being technically or economically feasible and/or not meeting NTIA's purpose and need. Include the following information for each eliminated alternative:

Based on [describe the reason for consideration, e.g., agency recommendation, a different tower location/routing], NTIA considered an alternative that would [describe the alternative]. NTIA eliminated this alternative from further analysis because [identify and briefly justify the reason for elimination].



2.4 No Action Alternative

Under the No Action Alternative, the [Project] would not be constructed and the environmental effects described in Section 3 would not occur.

The No Action Alternative would not meet the purpose and need because not constructing the Project would preclude [the expansion of high-speed internet access to unserved/underserved communities in the state/territory] [increased community connectivity and access to services such as telehealth/distance learning/etc.]. Existing broadband infrastructure would remain in place without [briefly restate the improvements to existing service conditions the Project would address]. The No Action Alternative would result in adverse effects on infrastructure and socioeconomics because existing deficiencies in essential infrastructure would continue and the socioeconomic benefits identified in Section 3 would not be realized.



3 Affected Environment and Environmental Effects

This section analyzes the affected environment and the potential environmental effects of the Proposed Action [and other action alternatives]. The [applicable regional] PEIS identified potential environmental effects on the natural and human environment that would result from the implementation of broadband deployment, as well as specific BMPs and mitigation measures that would avoid or minimize such effects. NTIA and [Grantee (or Subgrantee, if EA is for a BEAD project)] have reviewed the [applicable regional] PEIS and determined that the PEIS includes detailed analyses for [all] applicable environmental areas of concern (resource areas) for projects in [Project state], [except for (briefly list exceptions)]. [Grantee] has also reviewed, and commits to adhere to, the resource area-specific BMPs identified in Chapter [XX³] of the [applicable regional] PEIS.

The EA evaluates the Proposed Action [and other action alternatives] for two categories of potential effects:

- [No] or [less than significant (e.g., moderate, minor, or *de minimis*)] effects with incorporation of and adherence to the relevant [applicable regional] PEIS BMPs; or
- [No] or [less than significant] effects with incorporation of and adherence to the relevant [applicable regional] PEIS BMPs plus additional site-specific BMPs and mitigation measures.⁴

Table 3-1 analyzes the potential environmental effects of the Proposed Action under all relevant resource areas. The Affected Environment column summarizes the resource areas discussed in the state-specific PEIS applicable to the Project, supplemented as appropriate with site-specific information and data. The Environmental Effects column includes a statement of potential effects for each resource area, accounting for incorporation of the PEIS BMPs and any additional BMPs or mitigation measures where appropriate.

[Table 3-2 compares the effects of the Other Action Alternative to the Preferred Action Alternative.]

Step 1: Assess the State-specific PEIS for Resource Area Applicability

Review the state-specific PEIS and identify which resource areas this tiered EA should evaluate in Table 3-1. For example, the Infrastructure section of each PEIS includes background information on surface transportation routes, aerial and buried utilities, airports, ports/harbors, and utility towers. If the Project would only cross or be adjacent to transportation and utility corridors, evaluation of

⁴ NTIA will not approve a tiered EA for a proposed project that may result in potentially significant adverse environmental effects due to inadequate BMPs or mitigation measures. If you have any concerns that your Project will not be able to rely on the PEIS or incorporate sufficient BMPs or mitigation measures, consult with your NTIA Environmental Program Officer before working further on the EA.



_

³ The Chapter containing the BMPs is different in each PEIS, including Chapter 9 of the Western Region PEIS, Chapter 19 of the Central Region PEIS, Chapter 16 of the South Region PEIS, Chapter 17 of the East Region PEIS, and Chapter 11 of the Non-contiguous PEIS.

effects on airports, ports/harbors, or utility towers is unnecessary. If the Project would affect unique features that are not detailed in the PEIS but that the EA should consider, discuss those features in the table.

Consider the need for Table 3-1 to address any changes to the environmental setting (affected environment) for any resource areas since PEIS publication.

Guidance in green text identifies state resources Grantees may consider evaluating in Table 3-1 to support state environmental review requirements.

Step 2: Assess the Applicability and Age of the State-specific PEIS Data

Ensure the data in the state-specific PEIS is up to date and appropriate for Project-specific use. Identify any new or updated environmental laws or regulations enacted since PEIS publication, such as updated air quality emission standards or attainment statuses, updates to flood zones, and additions or removals from the Endangered Species Act (ESA) protected species list or the National Register of Historic Places (NRHP).

Validate the PEIS data by reviewing, as appropriate, the PEIS references for updated versions, NTIA's Permitting and Environmental Information Application and its associated Map Package,⁵ NTIA's National Broadband Availability Map (NBAM) (for authorized users only), 6 or newer references or online databases from appropriate sources. Grantees may consult relevant state agencies regarding updated legal and regulatory requirements. Where the PEIS or your review indicates the need for sitespecific data, include the data in Table 3-1 and support the data with appropriate references, mapping, or other sources.

⁶ The NBAM allows authorized users, such as NTIA's federal, state, or tribal partners, to log into a licensed environment, upload Project shapefiles, and export maps directly from the Permitting and Environmental Information Application. Licensed users can access NBAM at: https://broadbandusa.ntia.doc.gov/resources/data-and-mapping.



⁵ NTIA's Permitting and Environmental Information Application is an interactive mapping tool that contains multiple data layers identifying environmental resources and jurisdictions relevant to permitting, available at: https://nbam.maps.arcgis.com/apps/instant/portfolio/index.html.

Maps of the appropriate layers should be included in an appendix at a scale that clearly shows features that overlap, or are adjacent to, the Project. Although public users cannot upload shapefiles or export figures from this tool, NTIA has also created an ArcGIS package that can be used to create appropriate maps for inclusion in the EA, available

https://www.arcgis.com/home/item.html?id=37fa42c6313e4bdb9d8a9c05d2624891https://www.arcgis.com/home/item .html.

Step 3: Analyze Environmental Effects

Review the environmental effects discussion for each resource area in the state-specific PEIS and the PEIS' applicable resource area specific BMPs, which the Project must incorporate and adhere to as feasible and practicable.

Consider whether the EA must evaluate any additional effects beyond those discussed in the PEIS, such as whether there have been changes or advances in infrastructure or installation methods since PEIS publication. If so, analyze the effects in Table 3-1 in sufficient detail to make an effects determination, taking into account the criteria in the resource area effects tables in the PEIS.

Table 3-1. Affected Environment and Environmental Effects of the Proposed Action⁷

Resource Area	Affected Environment	Environmental Effects
General Guidance for each Resource Area	 Review each section of the state-specific PEIS and identify and characterize the site-specific features that would be affected by the Project. If evaluation of site-specific information requires additional space, add a heading and discussion below the table, but summarize the discussion in the applicable table row. 	Briefly state the potential environmental effects the Project (or Project elements or workspaces) would have on the relevant resource area (i.e., [no] or [less than significant] effects with BMPs and mitigation measures). The effects statement should be based on the PEIS effects section and tables and your site-specific analysis of the relevant resource area.
	 3) Include proper references for all data sources (including any data sources referenced in the guidance language in this table). 4) Be specific in identifying proximity to resources. For example, avoid saying "no waterbodies are near the Project" and instead say, "Project elements would not cross or occur within 100 feet of any waterbodies." 	Briefly reference the relevant standard PEIS BMPs the Project will incorporate for the resource area (see examples below). If the Project will incorporate additional BMPs or mitigation measures beyond those in the PEIS, describe them. Note: for illustrative purposes, the bracketed section and table references in this column are to the Pennsylvania chapter of the East Region PEIS and should be tailored to the EA as needed.
Infrastructure	The Project would cross or be immediately adjacent to the following infrastructure categories: [surface transportation routes, aerial utilities, buried utilities, airports, ports/harbors, utility towers, other], as generally described in the [state] PEIS chapter. Appendix: Infrastructure Map. All identified mapping	Consistent with [Section 12.2.1 and Table 12.2.1-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on infrastructure [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify

⁷ Note: if the EA is considering an additional action alternative, change "Proposed Action" to "Preferred Alternative".



Resource Area	Affected Environment	Environmental Effects
	should depict the Project shapefile. Grantees should ensure that the maps provided represent all applicable constraints and adjacent resources. See additional information on mapping tools under Section 3, Step 2. Unless otherwise noted below, suggested maps or map layers are available via NTIA's NBAM or Permitting and Environmental Information Application.	non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex 1: Consistent with Section 12.2.1 and Table 12.2.1-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on infrastructure through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Two roads would be crossed via bore, with no surface impact to the road. There would be minimal to no adverse effect on traffic or utility service levels and any effects would be limited in time and location. Ex 2: Consistent with Section 12.2.1 and Table 12.2.1-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on infrastructure with BMPs and mitigation measures. Two roads would be crossed via bore, with no surface impact to the road. There would be minimal to no adverse effect on utility service levels and any effects would be limited in time and location through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Potential effects on traffic patterns during open cut crossings would be reduced to less than significant levels with implementation of a Traffic Mitigation Plan (see Appendix [X]).
Soils	Based on review of the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Soil Survey Geographic Database (SSURGO), the Project would cross the following soils series: [list soils series if few or briefly summarize the number of series and reference the appendix]. [Provide a written or tabular summary of the compaction, topsoil mixing, and erosion potential, or indicate that there are no such soil constraints. Identify prime or unique farmlands.]	Consistent with [Section 12.2.2 and Table 12.2.2-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on soils [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex 1: Consistent with Section 12.2.2 and Table 12.2.2-1 of the



Affected Environment	Environmental Effects
Appendix: Project-specific SSURGO data. This can be a mapper output from the Web Soil Survey. [Appendix: NRCS correspondence on prime farmland conversion.] Note that this may be required if a new tower (or similar aboveground facility) is proposed in an area that may convert prime farmland.	Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on soils through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. There would be minimal to no adverse effect on soils due to erosion, topsoil mixing, or perceptible soil compaction. Any adverse effects on soils in the construction footprint along the trenched cable would be limited and temporary and prior conditions would be restored once construction has been completed.
	Ex 2: Consistent with Section 12.2.2 and Table 12.2.2-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on soils through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Placement of the new tower would not convert a significant area of prime or unique farmland [or otherwise note the results of NRCS consultation] and has a low likelihood of affecting erosion-prone soils.
The Project would be in the [physiographic province] of the [physiographic region]. The Project site and immediate vicinity is characterized by [describe general characteristics and/or any unique or problematic (for construction) physiography, surface geology, or bedrock geology, including any potential karst, or state that there are none]. The Project [is/is not] in the vicinity of known sites with extensive fossils within the state. Based on a review of available U.S. Geological Survey (USGS) data, [list mineral and/or fossil fuel resources, if	Consistent with [Section 12.2.3 and Table 12.2.3-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on geology [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.]
applicable] were identified within or immediately adjacent to the Project site. There [are/are not] geological hazards of concern in Project area including: [seismicity, soil liquefaction, landslides, subsidence, volcanism, etc.]. [Describe the hazard level for the applicable geologic hazards].	Ex. 1: Consistent with Section 12.2.3 and Table 12.2.3-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on geology through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. The footprint of the buried fiber would be small and predominantly within an existing right-of-way (ROW), and would not affect, or be affected by, areas with geologic hazards. Although fossil fuel
	Appendix: Project-specific SSURGO data. This can be a mapper output from the Web Soil Survey. [Appendix: NRCS correspondence on prime farmland conversion.] Note that this may be required if a new tower (or similar aboveground facility) is proposed in an area that may convert prime farmland. The Project would be in the [physiographic province] of the [physiographic region]. The Project site and immediate vicinity is characterized by [describe general characteristics and/or any unique or problematic (for construction) physiography, surface geology, or bedrock geology, including any potential karst, or state that there are none]. The Project [is/is not] in the vicinity of known sites with extensive fossils within the state. Based on a review of available U.S. Geological Survey (USGS) data, [list mineral and/or fossil fuel resources, if applicable] were identified within or immediately adjacent to the Project site. There [are/are not] geological hazards of concern in Project area including: [seismicity, soil liquefaction, landslides, subsidence, volcanism, etc.]. [Describe the hazard level for the



Resource Area	Affected Environment	Environmental Effects
	[Appendix: Paleontological Monitoring and Mitigation Plan.] Note: This may be required if there is the potential to encounter paleontological resources.	extraction would not occur within the Project boundary and would be avoided. Ex. 2: Consistent with Section 12.2.3 and Table 12.2.3-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on geology with BMPs and mitigation measures. Although the Project is in an area of high landslide incidence, permanent erosion controls, such as permanent trench and slope breakers, would be installed to prevent erosion during operations.
Water Resources	Based on review of the USGS National Hydrography Dataset (NHD), 8 the Project is within the [name of watershed] and would be within or be immediately adjacent to water resources, including [streams, rivers, lakes, canals, ditches, estuarine/coastal waters, floodplains, aquifers, or other aquatic habitats]. Wetlands are discussed separately below. Waterbodies [do/do not] occur within the footprint of the Project [identify waterbody crossing method if waterbodies are present]. The Project [would/would not] cross floodplains [identify the flood hazard level if applicable]. [If waterbodies are present, identify any that are sensitive or protected (i.e., wild and scenic rivers, state- designated high quality and exceptional value waters, 303(d) impaired waterbodies)]. The Project [would/would not] cross sole source aquifers or other significant groundwater resources. [Identify if the Project is within the state's coastal zone boundary.] Appendix: Surface Water Features. <i>Note: surface water</i>	Consistent with [Section 12.2.4 and Table 12.2.4-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on water resources [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex 1: Consistent with Section 12.2.4 and Table 12.2.4-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on water resources through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Installation of buried fiber would result in temporary and shallow ground disturbance, but surface resources would be fully avoided and protected. Although work would occur within the 100- or 500-year floodplain, new impervious surface would be minimal and would not change overland flow or groundwater recharge. Ex 2: Consistent with Section 12.2.4 and Table 12.2.4-1 of the Pennsylvania chapter of the East Region PEIS, there would be less

⁸ USGS, National Hydrography Dataset, https://hydro.nationalmap.gov/arcgis/rest/services/nhd/MapServer.



Resource Area	Affected Environment	Environmental Effects
	features are identified in the "USA Wetlands" layer of the "Floodplains/Wetlands" tab of NTIA's NBAM or Permitting and Environmental Information Application. If stream names are needed, they can be obtained through the USGS NHD. Appendix: Floodplain Map. Appendix: Sensitive/Impaired Waters and Sole Source Aquifers.	than significant effects on water resources with BMPs and mitigation measures. Workspaces to install the new towers would not occur in or adjacent to surface water resources or floodplains. Although the towers would be constructed over a sole source aquifer, minimal change in surface condition would occur and [Grantee] would implement the following additional BMPs, as requested by the state during consultation [list additional BMPs]:
Wetlands	Based on review of the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI), the Project would be located in, or adjacent to, wetlands classified under the national Wetlands Classification Standard (WCS) as [marine, estuarine, riverine, lacustrine, or palustrine wetlands]. Wetlands within the Project footprint include approximately [list the acreage/square footage of wetlands by type]. [Identify any wetlands of special concern or value.] [Add a statement about the need for and timing of site-specific wetland surveys.] Appendix: Wetlands Map. [Appendix: Wetlands Survey Report.]	Consistent with [Section 12.2.5 and Table 12.2.5-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on wetlands [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex 1: Consistent with Section 12.2.5 and Table 12.2.5-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on wetlands through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Potential effects on wetlands may result in periodic or temporary loss to wetland type and function that may be reversed over 1-2 growing seasons, and there would be no effects on high quality or special value wetlands. Ex 2: Consistent with Section 12.2.5 and Table 12.2.5-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on wetlands with BMPs and mitigation measures. Although [minimal, XX acres] of palustrine forested (PFO) wetlands would be cleared and may not be allowed to re-establish over time, effects on those wetlands would be mitigated in accordance with U.S. Army Corps of Engineers (USACE) permit



Resource Area	Affected Environment	Environmental Effects
		requirements.
Biological Resources	Biological resources include terrestrial vegetation, terrestrial and aquatic habitat, fisheries, wildlife, threatened and endangered species, critical habitat, and species of conservation concern. Vegetation The Project occurs within the [identify the U.S. Environmental Protection Agency (USEPA) Level III ecoregion(s)]. Vegetation (and wildlife habitat) within the Project site and immediate vicinity includes [list the general vegetation categories, such as forested, agricultural, herbaceous pasture, etc.]. [Provide acreage impacts for each vegetation community impacted, which may necessitate a table.] The [state agency] [did/did not] identify communities of concern within the Project site [list and describe the communities, if applicable]. Noxious weeds [were/were not] identified at the Project site [list the communities and their prevalence within the Project site]. Wildlife and Fisheries General wildlife within the Project area could include [identify the general categories of mammals, birds, reptiles and amphibians, invertebrates, shellfish, fish (noting coldwater or warmwater, as well as freshwater, estuarine, or marine), or invasive terrestrial or aquatic species]. [List the special status species or state-listed species potentially occurring in the Project area, potential for habitat, and likelihood of occurrence, or identify the number of species and refer to a separate table and appendix]. [List any Important Bird Areas® or other special wildlife habitat present in the vicinity of the	Consistent with [Section 12.2.6 and Table 12.2.6-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on vegetation, wildlife, or fisheries [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Note that separate effects statements for vegetation, wildlife, or fisheries should be provided if appropriate, as shown below. Ex 1: Consistent with Section 12.2.6 and Table 12.2.6-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on vegetation, wildlife, and fisheries through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Effects on these resources would be localized and predominantly temporary, and no population or subpopulation effects would occur. Ex 2: Consistent with Section 12.2.6 and Table 12.2.6-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on vegetation, wildlife, and fisheries with BMPs and mitigation measures. Effects on wildlife and habitat would be localized and predominantly temporary, and no population or sub-population effects would occur. [Grantee] also would adhere to the USFWS Recommended Best Practices for Communication Tower Design, Siting, Construction,

⁹ Audubon, Important Bird Areas, https://gis.audubon.org/portal/apps/sites/.



Resource Area	Affected Environment	Environmental Effects
	Project.] The Information for Planning and Consultation (IPaC) tool includes a list of migratory birds of concern in the Project area and indicates that bald [and/or] golden eagles [are/are not] likely to be present. General habitat for migratory birds covered under the Migratory Bird Treaty Act (MBTA) including [trees or suitable groundnesting habitat] [is/is not] present within the Project footprint. If marine or estuarine waters would be crossed or affected, the following paragraphs may be warranted for inclusion. Based on review of the National Oceanic and Atmospheric Administration (NOAA) Essential Fish Habitat (EFH) Mapper, the Project [would/would not] be within the immediate vicinity of EFH [for (add the appropriate fishery management plans) and would include (EFH types)]. Habitat Areas of Particular Concern (HAPC) [were/were not] identified within the vicinity of the Project [specify the HAPC, if applicable]. Marine mammals within the Project area that are protected under the Endangered Species Act (ESA) are discussed below; marine mammals protected solely under the Marine Mammal Protection Act (MMPA) may include [list the species]. Threatened and Endangered Species and Critical Habitat Based on review of the USFWS IPaC [and/or National Marine Fisheries Service (NMFS) ESA Mapper] [and state database/consultation], the Project would be located within the range of [list the protected species potentially occurring in the Project area, potential for habitat, and	Operation, Maintenance, and Decommissioning¹¹⁰ during design and construction of the new tower, for the protection of migratory birds. Also include a separate threatened and endangered species and critical habitat effects statement: Consistent with [Section 12.2.6.6 and Table 12.2.6-2] of the [Pennsylvania] chapter of the [East Region] PEIS, the Project [may affect and would be likely to adversely affect]; [may affect but would not be likely to adversely affect]; or [would have no effect on] federal species under the Endangered Species Act. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors.] Note that if there are multiple effects statements, the number of species per each effects statement should be listed here, with reference to the Special Status Species table. Ex. 1: Consistent with Section 12.2.6.6 and Table 12.2.6-2 of the Pennsylvania chapter of the East Region PEIS, the Project would have no effect on federal species under the Endangered Species Act. No potential habitat for federally listed species is present within the Project area (see Appendix B). Ex. 2: Consistent with Section 12.2.6.6 and Table 12.2.6-2 of the Pennsylvania chapter of the East Region PEIS, the Project may affect, but would not be likely to adversely affect, three federally listed species, based on adherence to agency-identified construction windows. The Project would have no effect on the remaining four federally listed species, as they are not present at the Project site. See Appendix B for species-specific determinations and USFWS concurrence with the "not likely to adversely affect" determinations.

¹⁰ See USFWS, "Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning," https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation.



Resource Area	Affected Environment	Environmental Effects
	determination of likelihood of occurrence, or identify the number of species and refer to a separate table]. Critical habitat for federally listed species [is/is not] present in or immediately adjacent to the Project site [if present, describe].	
	[Table 3-2: Special Status Species] Note that this table should include federally listed, proposed, or candidate species and state-listed species (if appropriate) identified as potentially present in the Project area by applicable agencies.	
	Appendix: Biological Consultation and Information:	
	IPaC Official Species List. Note that the IPaC species list is required to be verified every 90 days to account for changing species' statuses and ranges; therefore, the list included in the appendix should be dated within 90 days of the initiation of ESA consultation. If consultation has concluded and the official species list is over 90 days old, also include an unofficial IPaC pull that was used to verify the current species list.	
	• [IPaC Determination Key(s) and Consistency Letter.] Note that if determination keys are available for your Project, they should be completed and copies of the determination key and consistency letter should be included in the appendix. Note that USFWS also periodically updates determination keys and IPaC should be checked prior to completing the EA to ensure they are still current and accurate.	
	[EFH Mapper with Species List.]	
	• [State agency Wildlife Consultation]. Note that this should include any correspondence from the state indicating the presence/likely absence/lack	



Resource Area	Affected Environment	Environmental Effects
	of concern for sensitive species in the Project area. [Appendix: Biological Survey Report.]	
Land Use, Recreation, and Airspace	Land Use and Recreation Based on review of USGS Land Cover Data (Gap Analysis Project (GAP)), the Project would affect land classified as [list general land use categories such as forest and woodland, agricultural, developed]. The Project would result in a total of [XX acres] of temporary ground disturbance; specific types of vegetation impacts are discussed above, in vegetation. The Project [would/would not] result in the permanent conversion of land to a new land use category, [if applicable, add: including the conversion of (XXX) acres of (list original land use category) to (list new land use category) due to construction of (provide relevant Project details)]. The Project would cross land classified as [private, federal, state, and/or tribal]. [Provide acreage impacts for each land ownership category affected, and identify by name specific federal, state, or tribal lands crossed.] The Project would cross or be directly adjacent to the following recreation areas: [provide list of recreation areas]. Airspace (if Project includes towers) The closest airport to the Project is [list closest public/private/military airport], which is [provide distance from Project] from the Project in [provide location information such as county/city]. The Project [would/would not] require Federal Aviation Administration (FAA) notification based on [provide Project-specific information to support why it would or would not require notification based on current FAA regulations].	Consistent with [Section 12.2.7 and Table 12.2.7-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on land use, recreation, or airspace [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Note that separate effects statements for land use, recreation, or airspace should be provided if appropriate. Ex 1: Consistent with Section 12.2.7 and Table 12.2.7-1 of the Pennsylvania chapter of the East Region PEIS, there would be no significant effects on land use, recreational areas, or airspace through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Changes in the use or character of land, recreational areas, or airspace would be minimal, occur at isolated locations, and would be primarily short-term occurring during the construction phase or a portion of the operations phase. Ex 2: Consistent with Section 12.2.7 and Table 12.2.7-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on land use through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Changes in the existing land use would be minimal, occurring at isolated locations, and would be primarily short-term occurring during the construction phase or a portion of the operations phase. Project effects on recreation would be less than significant because they would result in minimal access restrictions and visitation



Resource Area	Affected Environment	Environmental Effects
	Note: Conditions requiring FAA notification are described in the PEIS. Appendix: Federal/Tribal Lands and State Lands Map. Appendix: Recreational Areas. Note: This may be a map of recreation areas near the Project using data from publicly available mappers such as Protected Areas Database of the United States (PAD-US).	reductions, occur at isolated locations that are not nationally significant, and persist only as long as the construction phase or a portion of the operations phase. The Project would have no effect on use of airspace because it would not result in any alterations in airspace usage or flight patterns, include structures over 200 feet, or exceed FAA slope ratio requirements. Ex 3: Consistent with Section 12.2.7 and Table 12.2.7-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on land use, recreation, and airspace with BMPs and mitigation measures. Land use conversion would be minimal, and permanent aboveground structures would be placed within previously disturbed land. Construction near recreation areas would avoid restricting access to the [recreational area name] through the use of HDD or boring techniques. The Project would have no effect on the use of airspace because it would not result in any alterations in airspace usage or flight patterns, include structures over 200 feet, or exceed FAA slope ratio requirements.
Visual Resources	Landscape characteristics at and around the Project site are discussed above under Land Use. The Project [would/would not] cross or be adjacent to [any/the following] visual resources: [if applicable, list which of the following broad categories apply: historic properties and cultural resources (which are described further below), parks and recreation areas, natural areas, state and national scenic byways, coastal areas, or other], as described in the [state] chapter of the [applicable regional] PEIS. [If a category applies, also include the name of the feature and the distance from the Project.] Appendix: Federal/Tribal Lands and Property, State Lands, Cultural and Heritage Resources Map.	Consistent with [Section 12.2.8 and Table 12.2.8-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on visual resources [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex 1: Consistent with Section 12.2.8 and Table 12.2.8-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on visual resources through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Changes in the existing viewshed would be isolated during the construction and deployment phases and the areas would be



Resource Area	Affected Environment	Environmental Effects
		restored to their original state after Project deployment. Ex 2: Consistent with Section 12.2.8 and Table 12.2.8-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on visual resources with BMPs and mitigation measures. Although the [identify the visual resource] is in close proximity, operational lighting of the new tower would be shielded and limited to that necessary for safe operation. Overall visibility of nighttime lighting would be short-term for mobile receptors and intermittent for stationary receptors.
Socioeconomics	The Project occurs in [list counties and states crossed by the Project]. [If applicable, identify the distance of any new towers to residential properties.] The Project [would/would not] include the construction of a new tower structure within 1,000 feet of existing residential structures [if applicable, add specific distance and location]. The [state] chapter of the [applicable regional] PEIS provides the socioeconomic conditions present in the state based on information available at the time of publication. While the current demographics and conditions within the Project area may vary from those in the PEIS, the general effects of broadband fiber deployment would be the same as those described in the PEIS. Therefore, the conditions presented in the PEIS are a good representation of the general existing socioeconomic conditions.	Consistent with [Section 12.2.9 and Table 12.2.9-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] socioeconomic effects [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex 1: Consistent with Section 12.2.9 and Table 12.2.9-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant adverse effects on socioeconomics. Because of the [small Project size/location of the Project within existing rights-of-way/etc.], the Project would result in negligible adverse changes to economic conditions, including to property values and/or rental fees, jobs and unemployment rates, and population changes. Any adverse effects would be locationally isolated and limited in duration. The Project may also result in direct and indirect beneficial effects associated with increased access to broadband services. Ex 2: Consistent with Section 12.2.9 and Table 12.2.9-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant adverse effects on socioeconomics. The communication tower was sited [XX] feet away from the closest residence, outside of the typical distance where property values



Resource Area	Affected Environment	Environmental Effects
		may be affected, based on research presented in the PEIS. The Project may also result in direct and indirect beneficial effects on area populations associated with increased access to broadband services.
Historic and Cultural Resources	The approach to addressing cultural resources may reflect implementation of a Program Alternative to following the standard Section 106 process. Review further guidance provided in Appendix C to determine which one of the four template language options in the appendix is applicable to the proposed Project and insert it in this column and modify it as appropriate.	Consistent with [Section 12.2.11 and Table 12.2.11-1] of the [Pennsylvania] chapter of the [East Region] PEIS, the Proposed Action would have [mitigated adverse effects]; [less than adverse effects]; or [no effects] on historic properties or cultural resources [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex 1: Consistent with Section 12.2.11 and Table 12.2.11-1 of the Pennsylvania chapter of the East Region PEIS, the Proposed Action would have no effect on historic properties, either directly or indirectly. As reviewed under the Program Comment (PC) for Federal Telecommunications Projects, the Project either meets conditions that require no further review, or the Project is exempt from further review through the application of conditional exemptions [add exemption number]. Consultation under Section 106 is complete. Ex 2: Consistent with Section 12.2.11 and Table 12.2.11-1 of the Pennsylvania chapter of the East Region PEIS, the Proposed Action would have an effect, but not an adverse effect, on historic properties conditioned on the implementation of a [add any conditional plans/measures]. Review under the PC for Federal Telecommunication Projects concluded that review is complete because these conditions are sufficient to avoid adverse effects and because the State Historic Preservation Office (SHPO) provided concurrence on [date].
		Ex 3 (when not reviewed under PC): Consistent with Section 12.2.11



Resource Area	Affected Environment	Environmental Effects
		and Table 12.2.11-1 of the Pennsylvania chapter of the East Region PEIS, the Proposed Action would have an effect, but not an adverse effect, on historic properties. There would be permanent direct effects to a non-contributing portion of a single historic property resulting from physical destruction to [identify the property-specific details, e.g., "the dilapidated mid-20th century barn associated with the National Register of Historic Places-eligible Smith Plantation".] A determination of effect was sent to the SHPO on [date] and review concluded with SHPO concurrence on [date].
Air Quality	The Project [county is/counties are] designated as in [attainment/unclassifiable or nonattainment/maintenance] with the National Ambient Air Quality Standards (NAAQS) [for the (list year, averaging time, and criteria pollutants which are in nonattainment/maintenance, e.g., 2015 8-hour ozone standard)] and [state if the Project is within an Ozone Transport Region]. Because operational emissions would be restricted to [list any operational emissions sources], no major operational emissions would occur as part of the Project and no Title V permit is required. Given the [county/counties] attainment status, General Conformity applicability [was/was not] analyzed [if analyzed, identify emissions and relevant pollutants in relation to the de minimis levels]. The Project [is/is not] within 100 km of [any/list federal Class I area(s)]. Note: Information may be presented in a table. Review USEPA's Greenbook for current attainment status. 11 There is a drop-down menu to review data by state and county. Or see NTIA's Permitting and Environmental Information Application (EPA Programs tab, which includes a set of layers for "Nonattainment").	Consistent with [Section 12.2.12 and Table 12.2.12-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on air quality [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] Ex: Consistent with Section 12.2.12 and Table 12.2.12-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on air quality through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Negligible emissions would occur for any criteria pollutants within an attainment area but would not cause a NAAQS exceedance.

¹¹ USEPA, Green Book, Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, https://www3.epa.gov/airquality/greenbook/anayo_ak.html.



Resource Area	Affected Environment	Environmental Effects
	[Appendix: Air Quality Attainment Status Map.] Note that a map may be beneficial if multiple nonattainment/maintenance areas are crossed.	
Noise and Vibration	Generally, land surrounding the Project facilities is [list all applicable land use categories and classifications, such as urban or rural, and agricultural, residential, developed, or industrial]. There [are/are no] noisesensitive receptors in proximity to the Project that could be susceptible to increased noise levels during construction or operation. [If applicable, list noisesensitive receptors: residences, schools, medical facilities, places of worship, libraries, churches, nursing homes, concert halls, playgrounds, and parks, and the distance to the nearest receptor(s)]. [Describe applicable county and local noise ordinances/regulations].	Consistent with [Section 12.2.13 and Table 12.2.13-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] noise or vibration effects [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter, including considerations for both construction and any operational sources of noise, such as generators, and identification of the expected timing of noise disturbances.] Ex. 1: Consistent with Section 12.2.13 and Table 12.2.13-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant noise and vibration effects through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Noise and vibration levels resulting from Project activities would exceed natural sounds but would not exceed typical levels from construction equipment or generators. Noise-producing activities during construction would occur between 8 a.m. and 5 p.m., Monday through Saturday. Ex 2: Consistent with Section 12.2.13 and Table 12.2.13-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant noise and vibration effects with BMPs and mitigation measures. Although most Project activities would not result in an exceedance of natural sounds or would be short-term in nature, the [Project component] requires additional noise insulation to decrease operational noise to levels below 55 decibels on the Aweighted scale (dBA) [or state-specific noise levels] at the nearest



Resource Area	Affected Environment	Environmental Effects
		construction would occur between 8 a.m. and 5 p.m., Monday through Saturday. Noise-producing activities during operations would occur during daylight hours, 7 days per week.
Human Health and Safety	[Confirm that the Grantee] would ensure that safe work conditions are provided and enforced during construction and operation of the Project. The Project [is/is not] near sites with the potential to affect human health and safety, such as contaminated properties or abandoned mines. [If present, identify the name and location of the site(s) in relation to the Project.] Appendix: Contaminated Sites and Public Hazards. Note: Contaminated sites are available for review under the "EPA Program" tab of the NTIA's NBAM or Permitting and Environmental Information Application.	Consistent with [Section 12.2.15 and Table 12.2.15-1] of the [Pennsylvania] chapter of the [East Region] PEIS, there would be [no] or [less than significant] effects on human health and safety [through adherence to the standard BMPs and mitigation measures in Chapter [17] of the [East Region] PEIS (if no other BMPs or mitigation measures)] [or] [with BMPs and mitigation measures (then specify non-PEIS BMPs below)]. [Include a brief justification for the effects statement consistent with the state PEIS chapter effects table and Project-specific factors, including incorporation of any BMPs or mitigation measures beyond those in the regional PEIS BMP chapter.] [Although manmade disasters cannot be predicted, [Grantee] confirms it would monitor for natural disasters and ensure that safety plans and evacuation routes are communicated to workers.]
		Ex. 1: Consistent with Section 12.2.15 and Table 12.2.15-1 of the Pennsylvania chapter of the East Region PEIS, there would be no significant effects on human health and safety through adherence to the standard BMPs and mitigation measures in Chapter 17 of the PEIS. Construction of the Project would not expose workers to hazardous chemicals, and contaminated sites are not known to exist in the Project area, but any discovered during construction and deployment would be handled in accordance with applicable regulations. Although manmade disasters cannot be predicted, [Grantee] confirms it would monitor for natural disasters and ensure that safety plans and evacuation routes are communicated to workers.
		Ex. 2: Consistent with Section 12.2.15 and Table 12.2.15-1 of the Pennsylvania chapter of the East Region PEIS, there would be less than significant effects on human health and safety with BMPs and mitigation measures. Although an abandoned mine is present within the Project area, [Grantee] would install an aerial cable on existing



Resource Area	Affected Environment	Environmental Effects
		poles where the mine would be crossed and would use low ground-weight equipment during construction throughout the area. Although manmade disasters cannot be predicted, [Grantee] confirms it would monitor for natural disasters and ensure that safety plans and evacuation routes are communicated to workers.

If the EA identified an Other Action Alternative in Section 2.2, use the table below to compare the effects of that alternative to the Proposed Action. Add a column for each additional Other Action Alternative as needed.

Table 3-2 compares the effects of the Other Action Alternative identified in Section 2.2 to the effects of the Preferred Action Alternative.

Table 3-2. Comparison of the Action Alternatives



Resource Area	Effects of Preferred Action Alternative	Affected Environment and Effects of [Name of Other Action Alternative]	
Guidance	Under each resource area, include a shortened determination statement, as presented in Table 3-1. Once all resource area rows are complete, summarize the overall determination.	Include any notable differences in the Affected Environment between the Preferred Action Alternative and the Other Action Alternative.	
		Provide a summarized effects determination for the Other Action Alternative.	
		Once all resource area rows are complete, indicate if the Other Action Alternative would have greater or lesser effects than the Preferred Action Alternative and summarize the overall determination.	
Example:	Less than significant. There would be minimal to no adverse	Affected Environment: No unique types of infrastructure would	
Infrastructure	effect on traffic or utility service levels and any effects would be limited in time and location.	be crossed by the Other Action Alternative route when compared to the Preferred Action Alternative route. Crossing methods and impacts would be similar.	
		Effect Determination: Less than significant. There would be minimal to no adverse effect on traffic or utility service levels and any effects would be limited in time and location.	
Example: Soils	Less than significant. Placement of the new tower would not convert a significant area of prime or unique farmland (or	Affected Environment: Approximately 1 acre of additional prime farmland would be permanently removed.	
	otherwise note the results of NRCS consultation) and has a low likelihood of affecting erosion-prone soils.	Effect Determination: Less than significant. Placement of the new tower would not convert a significant area of prime or unique farmland (or otherwise note the results of NRCS consultation) and has a low likelihood of affecting erosion-prone soils.	
Conclusion	The Preferred Action Alternative would result in less than significant environmental effects.	The Other Action Alternative would affect slightly less vegetated land, but more prime farmland than the Preferred Action Alternative. Overall, the effects of this alternative would be less than significant.	



4 Cumulative Effects

This section evaluates the cumulative effects of the Project [and any Other Action Alternatives (see Section 2.2)] on the environment resulting from the incremental effects of the Project [or the Other Action Alternatives] when added to the effects of other present and reasonably foreseeable future actions (including projects other than the Project that is the subject of this EA), regardless of what agency (federal or non-federal) or person undertakes such other actions. Section 3 considered past actions as part of evaluating the affected environment (baseline conditions).

You should identify present or reasonably foreseeable future actions or projects to be included in Table 4-1 by searching online databases (e.g., state departments of transportation), conducting general internet research for the area, or engaging in discussions with local landowners or planning boards. Your search should take into account the appropriate region of influence for assessing cumulative effects, which may vary by the relevant Project component and resource area (e.g., 500 feet for a buried fiber line within an existing ROW; 2 miles for a new tower that might result in visual impacts to nearby residences; watershed-wide [hydrologic unit code 8 or 10] for projects with new or larger ground disturbance).

[If you did not identify any present or reasonably foreseeable future actions or projects within range of the proposed Project:]

Based on [describe database searches performed, and other research conducted as appropriate], there are no present or reasonably foreseeable future actions or projects within range of the proposed Project area or that overlap with the extent of the Project's effects on the resource areas analyzed in Section 3. Therefore, this EA concludes that the Project [and the Other Action Alternatives] would not result in any significant cumulative effects.

[If you did identify such actions or projects:]

Table 4-1 identifies present and reasonably foreseeable future actions within range of the proposed Project area. [Add a conclusion, such as: This EA concludes that although these actions together have the potential to result in [minor/moderate] cumulative effects on [list relevant resource areas], the incremental effects of the proposed Project [or the Other Action Alternatives], when added to those cumulative effects, would not be significant.] [Note: if there are particularly controversial resource area effects at issue, consider including more individualized cumulative effects conclusions for specific resource areas.]

Table 4-1. Present and Reasonably Foreseeable Future Actions

Action Name	Location	Sponsor or Proponent	Brief Description	Anticipated Timing
[Present or Reasonably Foreseeable Future Action name]	[location: city, state, and distance from the proposed Project area, if available; some actions may occur at a regional level]	[Proponent name]	[Brief description]	[Anticipated timing or schedule of other action or project, if known, or anticipated completion



		date]
		i

References: [Add references for the included information.]



5 Relevant Laws, Regulations, and Permits

Table 5-1 lists relevant laws, regulations, and permits for the Project and describes the compliance status for each, including the status of any applicable consultations. [Grantee] confirms that it is consulting with the [applicable state agencies] and [applicable local municipalities/entities] regarding proposed Project construction and will comply with all applicable laws and regulations.

Grantees should tailor Table 5-1 and supplement it with applicable state and local laws, regulations, and permits based on Project-specific needs and state and local agency consultations and requirements. Grantees should ensure the information in the table is consistent with the affected environment discussions in Section 3 and with the affected environment sections of the applicable PEIS, taking into account relevant changes since the PEIS was issued. Grantees should consult their NTIA Environmental Program Officer with any questions.

Table 5-1. Relevant Laws, Regulations, and Permits

	Laws and Regulations	Status				
General						
•	National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.)	NTIA will complete this section.				
Vegeta	ation, Wildlife, and Fish					
•	Endangered Species Act (ESA)(16 U.S.C. § 1531 et seq.)	Summarize compliance, as applicable.				
•	Migratory Bird Treaty Act (MBTA) (16 U.S.C. §§ 703-712)					
•	E.O. 13186, Responsibilities to Federal Agencies to Protect Migratory Birds					
•	Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. §§ 668-668d)					
•	Fish and Wildlife Conservation Act (16 U.S.C. §§ 2901-2911]					
•	Fish and Wildlife Coordination Act (16 U.S.C. § 661 et seq.)					
•	Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801 et seq.)					
Water	s, Wetlands, and Floodplain Protection					
•	Clean Water Act (CWA) (33 U.S.C. § 1251 et seq.)	Summarize compliance, as applicable.				
•	Floodplain/Wetlands Environmental Review Requirements (10 C.F.R. § 1022.12)					
•	E.O. 11988, Floodplain Management					
•	E.O. 11990, Protection of Wetlands					
•	Coastal Zone Management Act (CZMA) (16 U.S.C. § 1451 et seq.)					



	Laws and Regulations	Status					
Air Qu	Air Quality						
•	Clean Air Act (CAA) (42 U.S.C. § 7401 et seq.)	Summarize compliance, as applicable.					
Historic and Cultural Resources							
•	Antiquities Act (54 U.S.C. §§ 320301-320303 (Monuments, Ruins, Sites, and Objects of Antiquity) and 18 U.S.C. § 1866(b) (Historic, Archeologic, or Prehistoric Items and Antiquities)	Summarize compliance, as applicable.					
•	National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 <i>et seq.</i>) and NHPA Section 106 regulations (36 C.F.R. Part 800)						
•	Archaeological Data Preservation Act (16 U.S.C. §§ 469–469c-1)						
•	Archaeological Resources Protection Act (16 U.S.C. § 470aa)						
•	Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. § 3001 et seq.)						
•	E.O. 13007, Indian Sacred Sites						
•	American Indian Religious Freedom Act (42 U.S.C. § 1996)						
Noise,	Public Health, and Safety						
•	Noise Control Act (42 U.S.C. § 4901 et seq.)	Summarize compliance, as applicable.					
•	Spill Prevention Control and Countermeasures Rule (40 C.F.R. § 112.12)						
•	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. § 9601 <i>et seq.</i>)						
•	Resource Conservation and Recovery Act (RCRA) 42 U.S.C. § 6901 <i>et seq.</i>)						
•	Toxic Substances Control Act (TSCA) (15 U.S.C. 2601 <i>et seq.</i>)	Summarize compliance, as applicable.					
•	Construction, Marking, and Lighting of Antenna Structures of the Federal Communications Commission regulations, Part 17 (47 C.F.R. Chapter 1)						
STATE	STATE, COUNTY, AND LOCAL PLAN CONSISTENCY						
•	List any state, county, or local planning agencies.	Describe how the Proposed Action would or would not comply with applicable state, county, or local plan directives or regulatory requirements.					



6 List of Preparers

Table 6-1 lists the individuals involved in preparing this EA.

Table 6-1. List of Preparers

Name	Organization	Title/Role	Qualifications



7 References

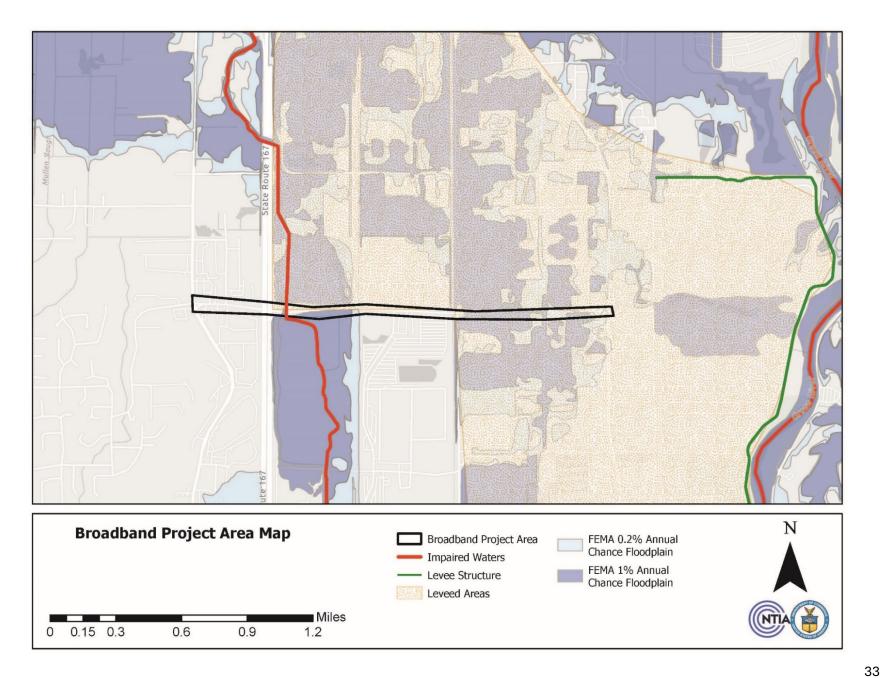
Only information sources cited in the EA should appear in the reference list. The reference list should include the author's name, date and title of publication, and website location or other reference source data. If data were gathered through personal communication, then the name of the persons involved and the date of the communication should be included.



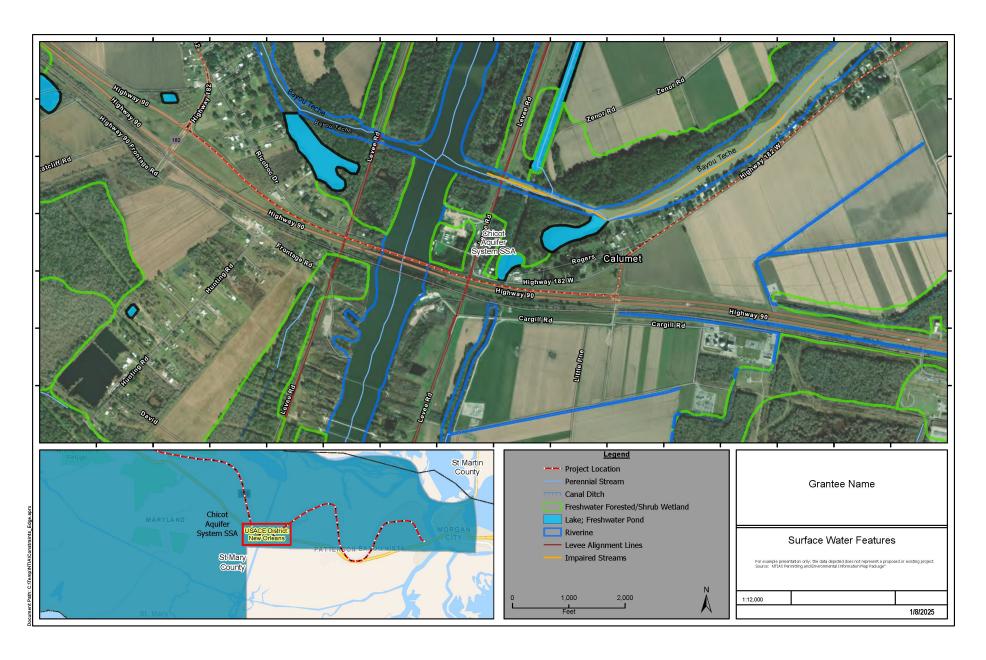
APPENDIX A: FIGURES

See below for examples of maps depicting various water resources generated from NBAM and the Permitting and Environmental Information Application mapping package. Grantees should adjust figure content and format based on Project-specific needs.











APPENDIX B: BIOLOGICAL CONSULTATION AND INFORMATION

Change the appendix title and add flysheets as needed.



Table B-1. Federally and State-Listed Species in the Project Area¹²

Common Name	Scientific Name	Federal Status ¹³	State- Status ¹⁴	Habitat Description	Potential for Occurrence / Determination of Effects
Birds					
Species Example	Scientific Name	Federal listing status and jurisdictional agency	State- listing status	Brief description of preferred habitat, including any critical habitat, if designated (or proposed). Also identify any sensitive time periods.	Determination of effect. Justification for that determination, including presence or absence of habitat, likelihood of occurrence, and any species-specific mitigation measures.
Eastern black rail	Laterallus jamaicensis jamaicensis	T (USFWS)		Found in emergent marsh wetlands with shallow standing water. Requires dense cover and is generally associated with cattails, hardstem bulrush, and other wetlands species which may include an overstory with willow. No critical habitat has been designated. Breeding occurs between [date and date].	No effect. The Project would not affect wetlands and would occur within existing industrial facility sites and existing ROWs that do not provide suitable eastern black rail habitat.
Mammals					
Fish					
Insects					
Reptiles/Am	phibians				
Plants					

¹² The federal and state species lists were verified to be accurate on [date].

¹⁴ [Add notes as applicable.]



¹³ E = Endangered, T = Threatened, C = Candidate, PE = Proposed Endangered, PT = Proposed Threatened.

Common	Scientific	Federal	State-	Habitat Description	Potential for Occurrence /
Name	Name	Status ¹³	Status ¹⁴		Determination of Effects



APPENDIX C: CULTURAL RESOURCES INFORMATION

Change the appendix title and add flysheets as needed.



Use this guidance to determine which set of template language should be included in the cultural resources Affected Environment column of Table 3-1 of the EA and updated as appropriate.

NTIA will apply a Program Comment (PC) when conducting a Section 106 review under the National Historic Preservation Act (NHPA) where appropriate, considering the effect of the undertaking on historic properties. A PC is considered a Program Alternative under 36 C.F.R. § 800.14(a). Grantees should consider whether the following two PCs apply to the Proposed Action:

- The PC to Avoid Duplicative Reviews for Wireless Communication Facilities Construction and Modification 15:
 - This PC is applied when the Proposed Action involves deployments that have either undergone or will undergo Section 106 review, OR
 - o If the Proposed Action is exempt from Section 106 review, under the Federal Communications Commission (FCC) Nationwide Programmatic Agreement (PA) and/or the FCC Collocation PA.
- The PC for Federal Telecommunications Projects (amended) 16, 17:
 - This PC applies to all federal telecommunications deployment undertakings that are carried out, permitted, licensed, funded, assisted, or approved by any federal agency. It is NTIA's intent that Grantees apply this PC whenever applicable.
 - The PC may not be applicable if the Proposed Action would be on or affect certain excepted resources. These resources include: National Monuments, National Memorials, National Historical Parks, National Historic Trails, National Historic Sites, National Military Parks, and National Battlefields, and Tribal Lands.
 - If the Proposed Action affects one or more of the excepted resources, the PC could be applied if the relevant federal agency or Tribal Historic Preservation Office (THPO)/Native Hawaiian Organization (NHO) (acting in lieu of a State Historic Preservation Office (SHPO)) determine that application of the PC is sufficient for Section 106 review. A Grantee must have written tribal consent to use the PC for Section 106 reviews involving tribal lands.

¹⁷ NTIA's guidance providing visualization of the Program Comment process is available at: https://broadbandusa.ntia.gov/sites/default/files/2024-04/The_Advisory_Council_on_Historic_Preservation.pdf.



-

¹⁵ The Advisory Council on Historic Preservation (ACHP)'s "Program Comment to Avoid Duplicative Reviews for Wireless Communication Facilities Construction and Modification" is available at: https://www.achp.gov/digital-library-section-106-landing/program-comment-avoid-duplicative-reviews-wireless.

¹⁶ The ACHP's "Program Comment for Federal Telecommunications Projects" (amended) is available at: https://www.achp.gov/sites/default/files/program_comments/2024-03/Communications%20Project%20PC%20amendment%20-%2020240313%20letterhead_SIGNED.pdf.

o Applicability:

- If the PC for Federal Telecommunications Projects (amended) cannot be applied to the Proposed Action, OR
- If the Proposed Action was reviewed under the PC and resulted in an adverse effect, ¹⁸ the standard Section 106 review process under 36 C.F.R. §§ 800.1 through 800.13 may apply. If so, skip to the 'Standard Section 106 Review' guidance in this template. ¹⁹

If the Proposed Action was subject to the PC for Telecommunications Projects Review:

A review under the PC may be concluded as described in Option 1, Option 2, or Option 3 below. Identify the option appropriate for the Proposed Action and follow the guidance.

- <u>OPTION 1</u>: The results of a Records Check <u>did not result</u> in the identification of historic properties in the Area of Potential Effect (APE) and the APE meets one or more of the exclusion criteria under PC Section IV.A.3a-c.
- **OPTION 2**: The results of the Records Check identified historic properties in the APE and/or the APE does not meet one or more of the exclusion criteria under PC Section IV.A.3a-c.
 - One or more of the Conditional Exemptions described in PC Sections VI-XI are applicable to the Proposed Action. <u>Note</u>: Exemptions may require a Conditional Exemption Implementation Plan if avoidance measures are required.
- <u>OPTION 3</u>: The result of the Records Check identified historic properties are present in the APE and/or Conditional Exemptions described in PC Sections VI-XI <u>do not</u> apply. A Survey and/or Monitoring Program would be implemented to avoid adverse effects.

If none of the options above apply, and/or the Proposed Action is/was reviewed under 36 C.F.R. §§ 800.1 through 800.13 skip to the 'Standard Section 106 Review' guidance in this template below the OPTION Table.

¹⁹ The regulations outlining the standard Section 106 process are codified in 36 C.F.R. §§ 800.3 through 800.7 (or other Program Alternative under 36 C.F.R. § 800.14) and may be reviewed here: https://www.ecfr.gov/current/title-36/chapter-VIII/part-800/subpart-B.



_

¹⁸ Adverse effects, as described by the ACHP, may be found here: https://www.ecfr.gov/current/title-36/chapter-VIII/part-800/subpart-B/section-800.5.

If the PC for Federal Telecommunications Projects applies, choose the appropriate text for the EA based on the selected option described above:

OPTION 1	OPTION 2	OPTION 3
Include the following text:	Include the following text:	Include the following text:
In accordance with guidance issued by the Advisory Council on Historic Preservation (ACHP), the Program Comment for Federal Telecommunications Projects (PC) applies to the Proposed Action and the NTIA has elected to use the PC process as an alternative to the standard Section 106 review process.	In accordance with guidance issued by the Advisory Council on Historic Preservation (ACHP), the Program Comment for Federal Telecommunications Projects (PC) applies to the Proposed Action and the NTIA has elected to use the PC process as an alternative to the standard Section 106 review process.	In accordance with guidance issued by the Advisory Council on Historic Preservation (ACHP), the Program Comment for Federal Telecommunications Projects (PC) applies to the Proposed Action and the NTIA has elected to use the PC process as an alternative to the standard Section 106 review process.
Note: If the PC to Avoid Duplicative Reviews is also applicable (i.e., the Proposed Action includes towers and/or facilities that are FCC-licensed spectrum) include the following text:	Note: If the PC to Avoid Duplicative Reviews is also applicable (i.e., the Proposed Action includes towers and/or facilities that are FCC-licensed spectrum) include the following text:	Note: If the PC to Avoid Duplicative Reviews is also applicable (i.e., the Proposed Action includes towers and/or facilities that are FCC-licensed spectrum) include the following text:
[The Proposed Action includes (list facilities using FCC-licensed spectrum) which support the use of Federal Communications Commission (FCC) licensed spectrum and is subject to the PC to Avoid Duplicative Reviews for Wireless Communication Facilities Construction. These facilities are identified on the proposed Project mapping, however, are reviewed under FCC's Nationwide Programmatic Agreement (PA) and/or the FCC's Collocation PA and therefore not discussed in this document.]	[The Proposed Action includes (list facilities using FCC-licensed spectrum) which support the use of Federal Communications Commission (FCC) licensed spectrum and is subject to the PC to Avoid Duplicative Reviews for Wireless Communication Facilities Construction. These facilities are identified on the proposed Project mapping, however, are reviewed under FCC's Nationwide Programmatic Agreement (PA) and/or the FCC's Collocation PA and therefore not discussed in this document.]	[The Proposed Action includes (list facilities using FCC-licensed spectrum) which support the use of Federal Communications Commission (FCC) licensed spectrum and is subject to the PC to Avoid Duplicative Reviews for Wireless Communication Facilities Construction. These facilities are identified on the proposed Project mapping, however, are reviewed under FCC's Nationwide Programmatic Agreement (PA) and/or the FCC's Collocation PA and therefore not discussed in this document.]
Continue including the following text:	Continue including the following text:	Continue including the following text:



No cultural resources were identified. Based on the negative results of the Records Check, one [or more] of the exclusion criteria listed under PC Section IV.A.3a-c apply to the Proposed Action, including [list the exclusion(s)], and Section 106 responsibilities are complete in accordance with the PC.

On [date], [Grantee], as NTIA's delegated authority, submitted a PC Documentation Form to the [state] state historic preservation office (SHPO) and any consulting parties. This form notified the SHPO and consulting parties of the NTIA's intention to use the ACHP PC process and provided project documentation for the review. [Grantee's] submittal indicated that in accordance with the ACHP's guidance, no further Section 106 responsibilities are required for the Proposed Action (see Appendix [X]).

To evaluate potential tribal concerns regarding the Proposed Action, the NTIA has initiated tribal notification using the FCC's Tower Construction Notification System. To date, tribal responses [have/have not] been received (see Appendix [X]). [If received, list the name of the tribal organization or Native Hawaiian organization, date of response, a summary of the response received and any applicable actions the Grantee (will take/has taken) to ensure that tribal concerns are addressed.]

Appendix: Program Comment Documentation Form and supplemental documentation.

[Appendix: Survey Plan.] Note: Include if a survey report was required and completed.

[Appendix: Conditional Implementation Plan, Monitoring Plan(s)/Site Avoidance Plan(s).]

The Records Check resulted in the identification of historic properties in the Area of Potential Effect (APE) and/or the need to apply conditional exemptions. One or more conditional exemptions as listed in PC Section VI-XI were applied to the Proposed Action. Exemptions applied to [list the type of deployments exempted, i.e. buried fiber, aerial fiber on replacement poles, etc.] and all deployments are exempt from further review. When exemptions include avoidance measures, include this sentence: The review is concluded conditioned on following a Conditional Exemption Implementation Plan.

On [date], [Grantee], as NTIA's delegated authority, submitted a PC Documentation Form to the [state] state historic preservation office (SHPO) and any consulting parties. This form notified the SHPO and consulting parties of the NTIA's intention to use the ACHP PC process and provided project documentation for the review. [Grantee's] submittal indicated that in accordance with the ACHP's guidance, no further Section 106 responsibilities are required for the Proposed Action (see Appendix [X]).

On [date], the SHPO provided its response indicating its concurrence on a concluded review conditioned on the [enter appropriate condition, i.e. Conditional Implementation Plan, Survey and/or Monitoring Plan].

To evaluate potential tribal concerns regarding the Proposed Action, the NTIA has initiated tribal notification using the FCC's Tower Construction Notification System. To date, tribal responses [have/have not] been received (see Appendix [X]). [If received, list the name of the tribal organization or Native Hawaiian

The Records Check identified historic properties and/or areas with high probability for cultural resources in the Area of Potential Effect (APE). It was determined that a Survey and/or Monitoring Program would be implemented to sufficiently avoid adverse effects.

On [date], [Grantee], as NTIA's delegated authority, submitted a PC Documentation Form to the [state] state historic preservation office (SHPO) and any consulting parties. This form notified the SHPO and consulting parties of the NTIA's intention to use the ACHP PC process and provided project documentation for the review. [Grantee's] submittal indicated that in accordance with the ACHP's guidance, no further Section 106 responsibilities are required for the Proposed Action (see Appendix [X]).

On [date], the SHPO provided its response indicating its concurrence on a concluded review conditioned on the [enter appropriate condition, i.e. Conditional Implementation Plan, Survey and/or Monitoring Plan].

To evaluate potential tribal concerns regarding the Proposed Action, the NTIA has initiated tribal notification using the FCC's Tower Construction Notification System. To date, tribal responses [have/have not] been received (see Appendix [X]). [If received, list the name of the tribal organization or Native Hawaiian organization, date of response, a summary of the response received and any applicable actions the Grantee (will take/has taken) to ensure that tribal concerns are addressed.]



Note: Include only if these were required	organization, date of response, a summary of	Appendix: Program Comment Documentation
through consultation. Appendix: Inadvertent Discovery Plan.	the response received and any applicable actions the Grantee (will take/has taken) to ensure that tribal concerns are addressed.]	Form and supplemental documentation. [Appendix: Survey Plan.] Note: Include if a survey report was required and completed.
	Appendix: Program Comment Documentation Form and supplemental documentation. [Appendix: Survey Plan.] Note: Include if a	[Appendix: Conditional Implementation Plan, Monitoring Plan(s)/Site Avoidance Plan(s).] Note: Include only if these were required through consultation.
	survey report was required and completed. [Appendix: Conditional Implementation Plan, Monitoring Plan(s)/Site Avoidance Plan(s).] Note: Include only if these were required through consultation.	Appendix: Inadvertent Discovery Plan.
	Appendix: Inadvertent Discovery Plan.	



If the Proposed Action was reviewed under the "Standard Section 106 Review" process, include the following text:

For the Proposed Action, the direct area of potential effects (APE) was defined as [describe APE as defined in 36 C.F.R. § 800.16(d)]. [The indirect APE was defined as a (X.X-mile) radius around (list all aboveground facilities, including any tower site) to assess the potential for indirect or visual effects.] [Grantee] completed a Records Check of the APE to evaluate the potential for the Proposed Action to affect cultural resources. The Proposed Action would [occur on/affect], [identify each property that applies, such as National Monuments, National Memorials, National Historical Parks, National Historic Trails, National Historic Sites, National Military Parks, National Battlefields, National Historic Landmarks, and/or would (occur on/affect) historic properties on tribal lands for which there is no prior written agreement between the Indian Tribe(s) and the NTIA].

On [date], [Grantee], as NTIA's delegated authority, submitted a written request for Section 106 consultation to the [state] state historic preservation office (SHPO)/ tribal historic preservation office [THPO], and any other consulting parties. The request included notification of the NTIA's intention to proceed with a standard Section 106 review process and provided Project documentation for the review, as described below.

To evaluate potential tribal concerns regarding the Proposed Action, the NTIA initiated tribal notification using the Federal Communications Commission's Tower Construction Notification System. To date, tribal responses [have/have not] been received (see Appendix [X]). [If received, list the name of the tribal organization or Native Hawaiian organization, date of response, a summary of the response received and any applicable actions the Grantee (will take/has taken) to ensure that tribal concerns are addressed.]

In [month, year], [Grantee] conducted background research including a review of [list all sources reviewed including the state's site files, and National Register of Historic Places (National Register) online database]. [Grantee] then completed [list all field investigations, including any survey/inventory level investigations and National Register eligibility testing] and produced the requisite technical report(s) of investigations [list all reports prepared].

If no historic properties were identified in the preceding investigations, include the following text:

[Grantee's] investigations did not identify any historic properties in the APE. *Then skip to Conclusory Paragraph*.

If investigations identified historic properties in the APE, include the text below. <u>Note</u>: A table may be necessary to display the findings.

[Grantee's] investigations confirmed the following cultural resources, including historic properties, within the APE: [list the resources/properties identified within the APE, their National Register eligibility status, and describe whether each would be avoided, whether the Project has potential to affect historic properties, or if further investigations are warranted to determine National Register eligibility and/or the Project's potential to affect.]

If the Proposed Action has potential to affect historic properties, provide assessments that apply the criteria of adverse effects. Adverse effects are effects that would diminish the characteristics which qualify a property for inclusion in the National Register.



If historic properties were identified <u>and avoided</u>, include the following text:

Historic properties were identified in the APE and would be avoided through implementation of avoidance measures developed by [Grantee]. Avoidance measures are a condition of grant award and were considered sufficient to determine the proposed Project would have no adverse effects on historic properties. Then skip to Conclusory Paragraph.

If historic properties <u>cannot be avoided and adverse effects are likely</u>, include the following text:

The results of [Grantee's] assessment suggest a finding of Adverse Effect was appropriate for the Project for [list each property for which this finding was appropriate]. On [date], the [SHPO/THPO] concurred. A plan was developed to evaluate alternatives or modifications to the Proposed Action that would resolve adverse effects on historic properties. On [date], the [SHPO/THPO], and other consulting parties agreed on the plan and shall execute a Memorandum of Agreement (MOA) for implementation (see Appendix [X]).

If there are no potential adverse effects to historic properties, use this text:

<u>Conclusory Paragraph</u>: [Grantee]'s report of investigations was provided to the [SHPO/THPO], and other consulting parties for Section 106 review and comment. On [date], the [SHPO, THPO] provided its response indicating concurrence with a finding of [no historic properties affected *or* no adverse effect] [if conditional, add the condition] and no further Section 106 responsibilities are required for the Proposed Action (see Appendix [X]).

Appendix: Section 106 Consultation and supplemental documentation.

[Appendix: Inventory/Survey Report.] Note: Include if a report was required and completed.

[Appendix: Implementation Plan for how adverse effects would be avoided, minimized or mitigated if review concluded with a conditional no adverse effect.] *Note: Include only if these were required through consultation.*

[Appendix: Inadvertent Discovery Plan.] Note: Include only if these were required through consultation.



APPENDIX D: [APPENDIX TITLE]

Change the appendix title and add flysheets as needed.

