

# **NEPA for BEAD: Milestone Schedule & NEPA Timeline**



May 2026

## Disclaimer

This document is intended solely to assist applicants in better understanding the Broadband Equity Access, and Deployment (BEAD) grant program and the requirements set forth in the Notice of Funding Opportunity (NOFO) and follow-on policies and guidance for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFO, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.

# Overview | NEPA for the BEAD Program

The Broadband Equity, Access, and Deployment (BEAD) Program requires Eligible Entities (EEs) to serve as joint lead agencies to fulfill National Environmental Policy Act (NEPA) and associated obligations.



**To ensure the timely completion of environmental review for all BEAD-funded activities subject to NEPA review, the Grantee must serve as a “joint lead agency” in its capacity as the state (or Territory) agency administering the BEAD program in accordance with 42 U.S.C. 4336a(a)(1)(B) and carry out the duties described in 42 U.S.C. 4336a(a).**

*BEAD General Terms and Conditions, Section 13B*

## SPECIFIC AWARD CONDITIONS

As a joint lead agency, the EE must impose award conditions\* on subgrantees to ensure the timely completion of environmental review prior to construction, for actions subject to NEPA review:



**The Subgrantee must provide a milestone schedule identifying specific deadlines and describing how the Subgrantee proposes to meet timing requirements for:**

- the completion of any required consultations
- the completion of applicable reviews for NEPA, National Historic Protection Act (NHPA) Section 106, and Endangered Species Act (ESA) Section 7
- the submission of Environmental Assessments (EAs) or Environmental Impact Statements (EISs) if required

\*Note: See BEAD General Terms and Conditions, Section 13B for full requirements ([https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD\\_IPFR\\_GTC\\_04\\_2024.pdf](https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf))

# What is a BEAD Milestone Schedule?

A milestone schedule is a project management tool that lists key events, deadlines, or deliverables along a project timeline. Each milestone represents a significant achievement or decision point, such as completing an environmental review, submitting a permit application, receiving a permit, and starting construction.

NTIA and the Federal Permitting Improvement Steering Council have increased broadband permitting accountability by using “performance schedules” that identify the intermediate and final completion dates for environmental reviews and authorizations necessary to construct grant funded projects within the period of performance and can:



Improve Tracking and Oversight



Coordinate Concurrent and Dependent Reviews



Support Risk Monitoring & Escalation

ESAPTT’s optional permitting dashboard can help Grantees track and compare milestone progress against typical performance schedules for broadband projects.

## USING ESAPTT FOR MILESTONE SCHEDULE TRACKING STEP-BY-STEP



Import Permit Information from APPEIT



Identify Permits & Add Additional Information



Track Permit Progress



Escalate Issues to FPO



Document Permitting Progress

# Subgrantee Milestone Schedules



At a minimum, the Subgrantee must identify specific environmental review and permitting deadlines and describe how to meet timing requirements for:



The completion of any **required consultations**



The completion of applicable **reviews for NEPA**, National Historic Protection Act (NHPA) **Section 106**, and Endangered Species Act (ESA) **Section 7**



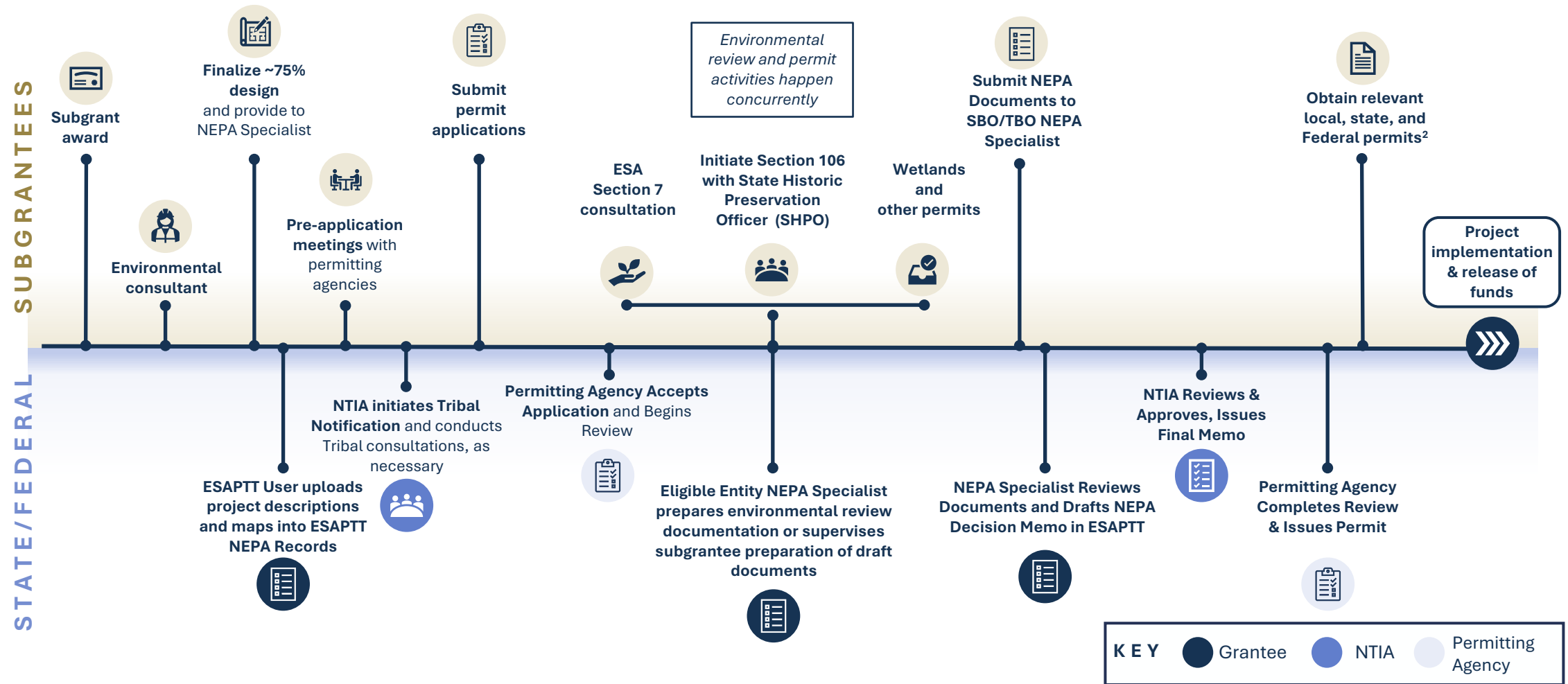
The submission of **Environmental Assessments (EAs)** if anticipated

*(NOTE: NTIA will assist in developing an EA schedule if it is determined that a categorical exclusion is not applicable.)*

*Early and integrated planning can enhance permitting success and speed deployment. Milestone Schedules should identify all applicable environmental review and permitting requirements, anticipated dates for application/submittal, acceptance, and approval or review completion.*

# Subgrantee Milestone Schedule Considerations




Milestone schedules will include NEPA & permitting work that qualifies as “limited permissible pre-implementation activity.”



# Milestones Schedule Sample

In addition to identifying specific deadlines and durations, the Subgrantee must also provide a narrative to describe the completion of consultations, NEPA and Section 106 reviews, and submission of NEPA documentation.

BEAD PROJECT ID | NEPA PROJECT ID #

Sample Subgrantee Activities		Months																		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
Project Design	Obtain expertise for NEPA, NHPA, and Section 7																			
	Finalize 75% of project design including mapping and permit identification																			
	Submit project overview to Grantees for inclusion in the Final Proposal																			
Tribal Coordination	Respond to any interested Tribes listed under the Section 106 Tab in Environmental Screening and Permitting Tracking Tool (ESAPTT)																			
	Pre-application meetings with permitting agencies																			
Permits & Authorizations	Conduct ESA Section 7 obligations, including use of the Information for Planning and Consultation (IPaC) tool and other relevant consultations																			
	Conduct Section 106 process, including coordination with the State Historic Preservation Office (SHPO), as needed																			
	Obtain relevant state, local, and federal permits																			
Schedules should reflect typical durations for anticipated NEPA level:		• Categorical Exclusion (CATEX)	~3 - 6 months 																	
		• Environmental Assessment (EA)	~6 - 12 months 																	
		• Env. Impact Statement (EIS)*	>12 months 																	

**A Milestone Schedule for a BEAD program project may include additional activities that are not represented on this sample schedule.**

# Federal Permitting Agency Application Process

Subgrantee schedules should reflect the typical milestones associated with federal broadband deployment permits (i.e., right-of-way permits), including pre-application meeting, draft application review, and resubmission.

## AVERAGE FEDERAL PERMITTING PROCESS

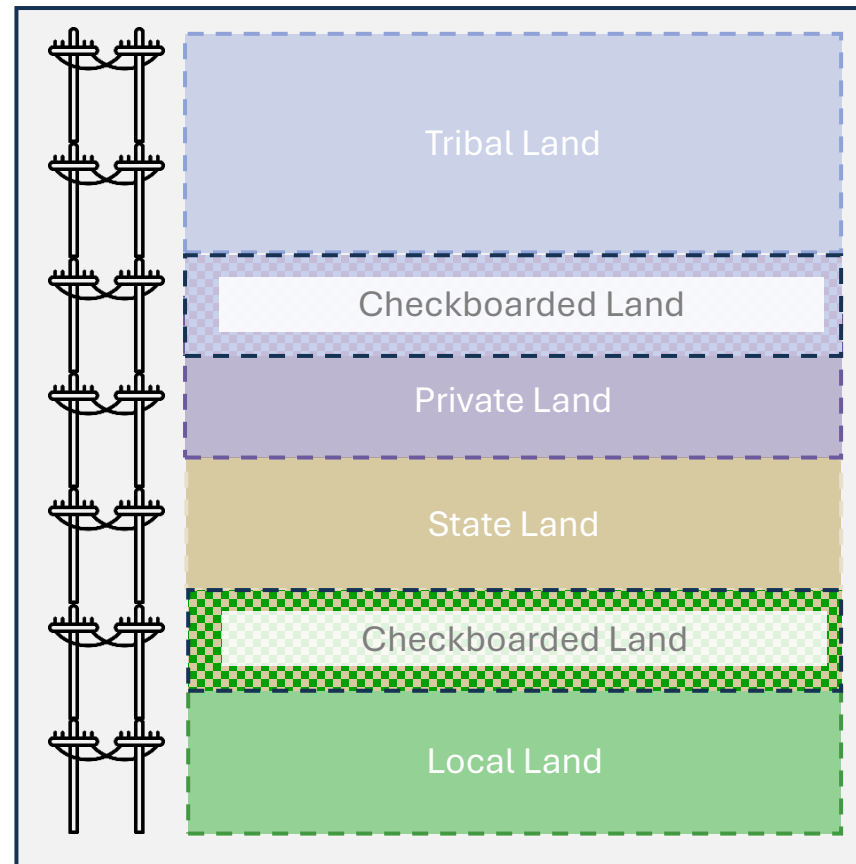
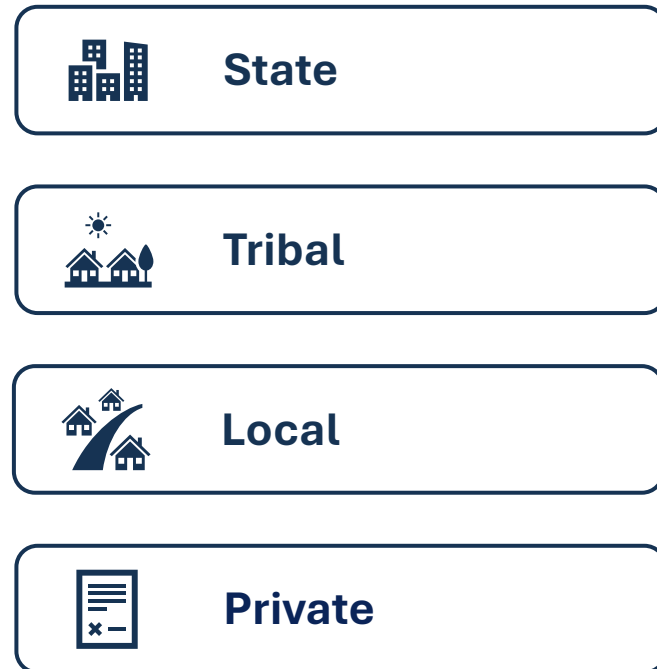


For more information on federal permitting processes, view the video recordings from the [NTIA and BLM Federal Interagency Broadband Permitting Summit](#). Applicants should also consider any required state, local, and Tribal permits.

# What about State, Local and Other Permits?

Milestone Schedules can identify the other permits, authorizations, easements, and rights-of-way that a project will require from state agencies, Tribes, towns, counties, municipal governments, and private entities.

## OTHER PERMIT TYPES



# Next Steps

EEs can consider taking valuable steps ahead of the subgrantee selection process to enable their role as a joint lead agency and to support subgrantees in effective planning for permitting and environmental requirements.

1 Review Section 13 of the BEAD Program [Terms and Conditions](#) and refer to other NTIA resources posted on the [NEPA for BEAD](#) webpage.

2 **Build environmental screening into the subgrantee selection process:** Encourage subgrantees to provide a draft milestone schedule in their proposals and to consider the scheduling, budgeting, and other timing implications of permitting and environmental requirements.



Encourage subgrantees to consider **the steps, timing, and budget required to meet all NEPA, NHPA, and permitting requirements**, including contracting of environmental consultants where necessary.



Encourage or require subgrantees to **pre-screen projects** (using tools such as [NTIA's Permitting and Environmental Information Application](#)) to identify permitting requirements and environmental constraints. This will inform the **plan and budget for any required environmental consultations, analysis, monitoring, or mitigation activities**.



Encourage subgrantees to streamline NEPA reviews by **planning projects that qualify for one of NTIA's 47 CATEXs** to reduce time and resources needed to prepare documentation of environmental analysis.



Encourage subgrantees to **identify and develop an approach to meet all local, state, federal, and Tribal permit requirements and deadlines**. Subgrantees should plan for early pre-application meetings with relevant permitting agency contacts.

3 **Design a comprehensive subgrantee NEPA program and compliance mechanism:** Align all evaluation and monitoring activities with the BEAD program requirements and design a process to manage subgrantees progress against the NEPA milestone schedules.



Consider **how to evaluate NEPA milestone schedules** prior to acceptance.



Determine **how to monitor compliance progress** once milestone schedules are in place to ensure proper reviews and approvals for funds disbursed while projects are awaiting final NEPA approval.