



**Broadband Equity, Access, and Deployment (BEAD)
Final Proposal
Environmental and Historical Preservation Compliance Summary**

Requirement 14.1

Description of how the Alaska Broadband Office (ABO) will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the ABO's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the ABO will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

ABO Environmental & Historic Preservation Procedure:

1. The ABO hired a qualified NEPA consultant in compliance with State of Alaska procurement procedures.
2. As part of Minimum Qualification Criterion 11, applicants to the Grant Program were required to provide:
 - a. A narrative description of how the National Environmental Policy Act (NEPA) requirements will be met, including 1) how the Applicant will provide either the development of a Categorical Exclusion (CATEX), an Environmental Assessment (EA), and/or an Environmental Impact Statement (EIS); and 2) how these requirements will be met by a qualified consultant, public-private partnerships with industry experts, private sector partners, non-profit entities, partner with state/territory educational institutions such as community colleges or university systems, or with other subject matter experts (SMEs).
 - b. A narrative identifying the anticipated NEPA category for the project, and confirming that all planned construction and deployment activities are covered by the actions described in Chapter 3 (Alaska) of the Nationwide Public Safety Broadband Network Final Programmatic Environmental Impact Statement for the Non-Contiguous United States (FPEIS) prepared by the First Responder Network Authority's (FirstNet) NEPA procedures identified under the BEAD program's authority as it relates to Alaska.
3. The ABO's qualified NEPA consultant conducted a review of each applicant's responses to Criterion 11 for a PASS/FAIL evaluation including the following elements:
 - a. Are NEPA requirements and approach adequately described?
 - i. Are protected resources adequately identified, or an approach to identification stated?
 - ii. Are the expected permits and/or consultations acknowledged?
 - b. Is the NEPA class of action identified?
 - c. Is the PEIS referenced?
 - d. Are qualified personnel identified?
4. Following Subgrantee selection, the ABO Permit Staff or the Qualified NEPA Consultant will upload each Subgrantee project description to the ESAPTT project record.
5. Subgrantees must provide a completed NEPA analysis provided by an independent subject matter expert.

6. The ABO's Qualified NEPA Consultant will complete a CATEX or Extraordinary Circumstances (EC) Questionnaire for each provisional Subgrantee project.
7. CATEX vs. NO CATEX
 - a. If no Categorical Exclusions apply to the Subgrantee project, it is referred for further review and processing of an EA or EIS.
 - b. If Categorical Exclusions apply and there are no EC or EC are present and have sufficient mitigation, the decision memo will be prepared and certified by the Qualified NEPA Consultant and transmitted to NTIA for approval.
8. The ABO will use the ESAPTT tool to track all other Federal, State, and local permits for each project.

Description of the ABO's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.

In compliance with State of Alaska procurement procedures, the ABO hired a Qualified NEPA Consultant that has, and will:

1. Evaluate Grant Program application Criterion 11 (NEPA) material submitted by applicants.
2. Evaluate NEPA analyses submitted by Subgrantees' subject matter experts.
3. Complete CATEX & EC Questionnaires.
4. Prepare and Certify Draft Decision Memos to NTIA.

Description of the ABO's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

Attachment A (Scope of Work) of the Grant Program Grant Agreement includes several EHP specific award conditions:

National Environmental Policy Act (NEPA)

1. Subgrantee is required to fulfill all NEPA requirements prior to the release of grant funds for construction and deployment activities.
2. Subgrantee is required to ensure all construction and deployment activities are covered by the actions described in Chapter 3 (Alaska) of the Nation Nationwide Public Safety Broadband Network Final Programmatic Environmental Impact Statement for the Non-Contiguous United States (FPEIS) prepared by First Responder Network Authority's (FirstNet) NEPA procedures identified under the BEAD program's authority as it relates to Alaska.
3. Upon award, Subgrantee is required to provide a completed NEPA Analysis to the ABO (acting as Joint Lead Agency) for a preliminary determination of appropriateness of the Subgrantee's analysis. This will initiate the Tribal Notification and Notice of Organizations process, if applicable.
 - a. If no Categorical Exclusions apply, and an EA or EAS is required, the EA or EIS must be completed prior to the release of Grant funds for construction or deployment activities.

National Historical Preservation Act (NHPA) Section 106

4. The Subgrantee will complete NHPA Section 106 consultation with Alaska's Office of History and Archeology (OHA) and/or, if Tribal, the Tribal Historic Preservation Office (THPO), in accordance with the NTIA National Historic Preservation Act (NHPA) Consultation Fact Sheet.
5. Unless approved otherwise in writing by the ABO, the Subgrantee will provide, within 30 days of the award, all documentation related to the project including maps and other Project description documents as required by the Department. Grantee will provide a letter from the OHA or THPO office(s) that the Project will have No

Effect or No Adverse Effect and an MOA signed between all parties setting forth requirements necessary to avoid, minimize, or mitigate any adverse effects identified by the OHA or THPO during the review.

6. If a Tribal applicant, Subgrantee will participate in the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS) process and engage with the NTIA to complete the Section 106 consultation.
7. Resolution to the Section 106 consultation is required prior to the release of Grant funds for construction or deployment activities.

Endangered Species Act (ESA) Section 7

8. In conformance with the NTIA Endangered Species Act (ESA) Section 7 Fact Sheet, Subgrantee will complete an ESA Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS).
9. Subgrantee will provide the Department with a Section 7 Biological Opinion within 30 days of award unless approved otherwise in writing by the Department.
10. Resolution to the Section 7 consultation is required prior to the release of Grant funds for construction or deployment activities.

Additional Federal, State, and Local Permits

11. Subgrantee is required to obtain all other relevant Federal, State, and local permits.