

USDA ReConnect Webinar

Environmental Overview

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Q&A Speakers:

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Transcript

Slide 1

Joan Keiser: Hello, and welcome to the *Environmental Overview* webinar. My name is Joan Keiser, and I am a member of the USDA RUS ReConnect support team. For about the next hour, I will provide an overview of the environmental requirements for the ReConnect Program.

Slide 2 – Agenda

Joan Keiser: This presentation will provide a high-level outline of the environmental requirements in the ReConnect Funding Opportunity Announcement (or FOA), as well as all applicable environmental compliance requirements included in 7 CFR 1970. We'll begin by presenting some key changes from the FY2019 FOA related to the environmental requirements. Then, we'll walk through completing the environmental components within the ReConnect application, including identifying the project's required level of NEPA review, drawing sites and routes within the construction map, and completing the environmental questionnaires.

Next up will be an overview of post-award requirements related to the environmental portions of the FOA and the application.

And in the final section of the webinar, we'll discuss site and route descriptions. We'll have some time at the end of the presentation for Q&A, in which Kristin Lough, Operations Branch Chief for the Telecommunications Program, will help field your questions. Please feel free to submit your questions via the chat box throughout the presentation, and we'll cover as many as time allows.

Slide 3 – FOA Requirements for Environmental

Joan Keiser: So, let's get started by reviewing the environmental requirements in the FOA. Applicants must submit or comply with the listed requirements to be eligible for consideration according to the FOA published on December 12, 2019.

Slide 4 – Key Changes from FY2019 Funding Opportunity Announcement (FOA)

Joan Keiser: Now we're going to move onto the key changes from the FY2019 Funding Opportunity Announcement. To start, there are a couple of minor changes in the environmental area between last year's FOA and this year's FOA. These changes clarify USDA expectations. First, project maps or site plans are required to identify cable routes, building locations, tower locations, equipment locations, and all structures and facilities that are part of the project. Everything you plan on putting on that route must be identified.

Second, again this year, USDA will use data provided in the application system to complete the environmental review and may require applicants to provide additional information and studies after the application has been submitted.

Slide 5 – FY20 FOA Requirements for Environmental

Joan Keiser: Now, we'll review key requirements in the FOA as they pertain to the environmental sections. First, applicants must adhere to federal environmental laws, statutes, regulations, and Executive Orders found in 7 CFR 1970. 7 CFR 1970 states that applicants for RUS loan and grant programs must propose projects that avoid or minimize negative environmental impacts. This regulation establishes how RUS will oversee and comply with required environmental authorizations and permits. Some of these environmental regulations include:

- The National Environmental Policy Act of 1969 (or NEPA)
- Section 106 of the National Historic Preservation Act of 1966 (referred to as NHPA), and
- Section 7 of the Endangered Species Act of 1973 (or ESA).

The examples I just listed are only three of the 40+ laws, statutes, and regulations found in 7 CFR 1970. I will talk more about the first three environmental regulations in a couple of slides. The second FOA requirement to keep in mind states that applicants must provide completed environmental questionnaires, known as EQs, which consist of project descriptions for environmental review purposes. These include:

- Site/route questionnaires,
- A project questionnaire, which captures the appropriate environmental information for the overall proposed project,
- And the National Historic Preservation Act Section 106 project questionnaire, which is required when a site/route has the potential to interfere with historic properties.

Slide 6 – FY20 FOA Requirements for Environmental (cont.)

Joan Keiser: Third. Sorry, we have a bit of a delay with the slides. Third, it is the applicant's responsibility to obtain all necessary federal, tribal, state, and local governmental permits and approvals necessary for the proposed construction. However, permits are not required at the time of application, but you will need them before you break ground on your project.

Fourth, applicants will also be required to cooperate with the agency in identifying feasible measures to reduce or avoid any identified adverse environmental impacts. And, finally the ReConnect program is covered under the National Programmatic Agreement (or NPA) which USDA, National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation executed in 2018 for sequencing Section 106 reviews.

- Please note, the NPA can only be applied to federally managed or tribal lands if the land management agency or tribe formally agree to its use.

Slide 7 – RD Environmental Requirements

Joan Keiser: Now let's move onto the RD environmental requirements. The regulations found at 7 CFR 1970 establish the policies and procedures to ensure that RD complies with NEPA and other applicable environmental requirements so that the agency can make better decisions

based on an understanding of the environmental consequences of proposed actions, and subsequently take actions that protect, restore, and enhance the quality of the environment.

There are three subparts within NEPA that I'd like to highlight for you:

- 7 CFR 1970, Subpart B defines NEPA Categorical Exclusions (or CE) which apply to projects considered not to have an individually or cumulatively significant effect on the environment, which most applicants will fall under.

The other two subparts that we highlight today are important because they pertain to construction projects:

- Subpart H -which is Section 106 of the National Historic Preservation Act of 1966 (NHPA)
- Subpart N - which is Section 7 of the Endangered Species Act of 1973 (ESA)

The agency and all ReConnect applicants must comply with these regulations as well as more than 40 other statutes, Executive Orders, and regulations applicable to agency programs.

Slide 8 – Completing the Environmental Components within the ReConnect Application

Joan Keiser: Now let's turn our attention to completing the environmental components within the application system. There are a few things applicants should consider before beginning to address the environmental components of the ReConnect application. It is important to note that applicants will need to complete both the project tab and the environmental tab within the application system to satisfy the environmental components of the application

Slide 9 – Project Tab

Joan Keiser: So, we'll start right now with the project tab in the application. In this section, applicants enter high-level information on their proposed project. It is broken into two subsections: project information and required level of NEPA review.

In the project tab, you describe the project and identify the type of technology that will be employed. It is important that applicants provide a brief summary of what the project activities are and where the project will take place. Completing the project information will allow you to complete the next subsection, the required level of NEPA review.

Slide 10 – Project Tab - Required Level of NEPA Review

Joan Keiser: When you enter this part of the application, they are informed that RD has identified classes of actions. The levels of environmental review required for your application and agency actions are listed in subpart B (Categorical Exclusions), subpart C (Environmental Assessments), and subpart D (Environmental Impact Statements).

The applicant is required to answer two questions: The first question states, "is the proposed action one that Rural Development has identified as requiring an Environmental Impact Statement (or EIS) or has an EIS been prepared due to the involvement of another federal agency?"

- If the applicant responds "no" to this question, the applicant will move to the next question.
- If the applicant responds "yes" to this question, an optional upload field appears in the application (as shown in the red box on the right side of the screen). If an EIS has been

prepared due to the involvement of another federal agency, the applicant should upload it here.

Moving on to the second question which states, “is the proposed action one that Rural Development has identified as requiring an Environmental Assessment (EA) or has an EA been prepared due to the involvement of another federal agency?”

- And again, if you answer “no” to this question, just proceed to the next portion of the application.
- If “yes” is selected and the selection of the first question was “yes”, then if an EA has been prepared due to the involvement of another federal agency, upload the EA in the upload tool that appears.

Slide 11 – Project Tab - Required Level of NEPA Review (Cont.)

Joan Keiser: If the applicant responds “yes” to either of the questions, an environmental impact statement or environmental assessment is required. The applicant must contact RUS at the email address ReConnect@usda.gov for guidance. The applicant will not have to answer question #3, regarding your contact with RUS immediately, but you must contact RUS for guidance for an EA or EIS before submitting the application and upload the evidence of consultation. Failure to provide evidence of this contact and guidance will result in RUS finding the application ineligible.

And do keep in mind, at any time in the application process, applicants may decide to get assistance from a third-party environmental consultant in completing their application. This is considered a professional service, and according to the FOA, pre-application expenses are any reasonable expenses, as determined by RUS, incurred after the release of this FOA, to prepare an application or to respond to RUS inquiries about the application. The last section in the project tab is project information documents. As previously stated, if applicants selected “yes” to either of the required level of NEPA review questions in the previous section, they will upload the EA or EIS related to their proposed project in this section. You can also upload your evidence of environmental consultation with RUS staff if required here as well.

Slide 12 – Environmental Tab

Joan Keiser: Now let’s move to the environmental tab of the application.

Slide 13 – Environmental Tab - Construction Map

Joan Keiser: The first section within the environmental tab is the construction map. The construction map is where you are required to draw their sites and routes. Sites include assets such as new or existing facilities, towers, parking lots, access roads and large cabinet installation. Routes are paths in which the proposed technology will be installed.

The map includes 14 different environmental resource layers, such as the flood hazard zones and national wetlands inventory layers, which will inform the environmental questioning process. Applicants must understand that the resources their project intersects with will impact how you fill out the EQs. In addition, the depth of detail in the project description will inform the environmental review process. And you should note that the resources seen as layers in the map will come up again in the EQs which reference specific subparts of the 7 CFR 1970.

Slide 14 – Environmental Tab - Adding a Site/Route

Joan Keiser: The next section in the environmental tab is called site/route descriptions. As mentioned on the previous slide, sites and routes are drawn on the construction map. Sites will include assets such as new or existing facilities, towers, parking lots, and access roads. Existing sites or central offices that will house ReConnect funded equipment must also be identified as a site on the construction map and the type of equipment installed must be described in the system.

To better inform the environmental review process, applicants should create multiple routes, delineate different technology types, installation methods and Right of Way requirements. After all sites and routes and their respective shapes have been created on the construction map, applicants must enter descriptions for each site and route. Project site and route descriptions will specify the types of facilities to be built or upgraded at each location. These descriptions will be used in conjunction with the EQs to determine the anticipated environmental and regulatory impact from construction or installation activity. Do keep in mind, you cannot enter a description for a site or route before it is created in the construction map.

This section must be completed before the applicant begins the environmental questionnaire section because the information provided in this section will determine the requirements for the EQ section. We'll discuss site/route descriptions in greater detail later on in the presentation.

Slide 15 – Environmental Tab - Environmental Questionnaires

Joan Keiser: Only after the sites and routes have been drawn on the construction map is the applicant ready to complete the environmental questionnaires (EQs). EQs are downloadable, fillable PDF forms that applicants upload to the ReConnect application system.

Applicants must complete up to three types of EQs:

- Site/Route Questionnaires,
- A Project Questionnaire,
- And the last is a NHPA Section 106 Project Questionnaire.

Reminder, applicants should not begin the EQs until the prior environmental sections are complete because the construction map and the site/ route descriptions inform what types of questionnaires are required for the application. When you access the EQ page under the environmental tab, you will be required to check a box confirming that you have completed the construction map and corresponding site and route descriptions. Once the checkbox has been selected, a message will display, informing the applicant whether an NHPA Section 106 EQ is required for the application.

After you check the box, click "Save" to save the response in the system. The construction map and the site/route descriptions will be locked after this response is saved. If you need to go back and change the construction map or descriptions after you've locked them, uncheck the checkbox and then click "Save" again. Once you've made all of your changes to the construction map and the site/ route descriptions are complete, applicants must select the check box one more time. Then, click "Save " one more time in order to submit the application. The next few slides, I will provide you details on the three types of EQs applicants may be required to complete.

Slide 16 – Environmental Tab - Site/Route EQ

Joan Keiser: All applicants must fill out a site or route EQ for each site or route in the project. The site and route EQs will capture the appropriate environmental information for each proposed site and route. Here are a few things to keep in mind, this information will be used in conjunction with the project EQ to determine the overall environmental compliance of the proposed project.

A few things to keep in mind when completing the Site/Route EQs:

- The information contained in the site/ route EQs must be consistent with the construction map and the corresponding site/ route descriptions.
- Many of the responses to the questions in the site/ route EQs are based on the different layers contained within the construction map.
- When completing the EQs, applicants should ensure that the appropriate features and options are selected in the construction map.
- User errors in the construction map will likely cause the EQs to be completed incorrectly and may lead to RUS finding the application to be ineligible.

Slide 17 – Environmental Tab - Accessing Endangered Species Information for Sites and Routes

Joan Keiser: Once sites and routes have been created on the construction map scroll down in the EQ page until you reach the tables listing the sites and routes. You must review the official list of endangered species for each site or route in order to complete the EQ. The U.S. Fish and Wildlife Service (USFWS) IPaC Planning Tool opens in another browser tab after you click the Official list button. You'll need a free account to access the IPaC Planning Tool, as described in the site/ route EQ. Listed marine species are managed by the National Oceanic and Atmospheric Administration (NOAA) Fisheries office. Projects occurring in water or in near water should obtain lists from the appropriate fisheries office.

Slide 18 – Environmental Tab - Project EQ

Joan Keiser: Now we'll move on to the project EQ. This EQ captures the appropriate environmental information for the overall proposed project. This information will be used in conjunction with each site and route EQ to determine the overall environmental compliance of the proposed project. And there are a few things to keep in mind here too:

- The site/ route EQs informing answers to the project EQ.

Only one project EQ is needed per project unless an exceptional circumstance occurs, and here are two examples of that:

- If a project had construction in two geographically unrelated areas with environmental impacts that are different in each location
- Or second, if there are multiple service areas in an application, applicants may need to fill out a project EQ for each service area if they are geographically dissimilar

Slide 19 – Environmental Tab - NHPA Section 106

Joan Keiser: The application system includes several built-in validations that help determine whether applicants are required to complete an NHPA Section 106 EQ. The validations are based on the construction map and the site and route descriptions. If your application requires

this EQ, the screenshot below will display. If you are prompted to fill out this EQ, it's in the applicant's best interest to consult a professional cultural resources contractor or consultant who meets the Secretary of the Interior (SOI) Professional Qualification Standards to prepare Section 106 information, to assist with the completion of this material. This EQ contains Section 106 Questions.

We are just about to wrap up the EQ sections. A few things to keep in mind:

- You can find these EQs under the forms and resources section on the ReConnect website today, and hyperlinks to the relevant sections of the 7 CFR 1970 Regulation are included in the EQs for your reference.
- Do bear in mind, completing the EQs does not represent the completion of the environmental section of the application. Applicants may be contacted for additional information regarding the environmental compliance of the proposed project.

Slide 20 – Environmental Tab - Environmental Documents

Joan Keiser: The last tab in the environmental section is for environmental documents. Applicants can view, download, delete, and replace any documents previously uploaded within the environmental sections of the application on this page. Again, you should complete the construction map, the site/ route descriptions and the EQs before starting to upload environmental documents here. The system will allow applicants to upload environmental documents after creating at least one site or route, but it's best to wait until you are done.

Slide 21 – Environmental Tab - Environmental Documents

Joan Keiser: Now we're going to move onto a short consideration of additional documents. As I mentioned before, USDA may request applicants to submit additional environmental documentation after application submission on a case-by-case basis. According to the FOA, if additional information is requested, an applicant will have up to 30 calendar days to submit the information. If such information is not timely submitted, USDA may reject the application. And again, according to the Funding Opportunity Application, if additional information is required after an application is accepted for funding, funds can be withheld by the agency under a special award condition requiring the Awardee to submit additional environmental compliance information sufficient for USDA to assess any impacts that a project may have on the environment.

A couple of quick examples of that requested documentation. One might be evidence of consultation with federal, state, and/or local agencies. Another might be a description of mitigation measures.

Slide 22 – Tips for Success

Joan Keiser: Here are a few tips to consider before you are taking on the environmental components in the application:

- Clearly identify and describe your sites and routes on the construction map.
- Understand and be aware of which environmental and historic resource areas the project will impact.
- Determine whether the project will impact floodplains, wetlands, or other resources
- Identify if the proposed project will require new rights-of-way, or if it can be built within existing rights-of-way.

- Establish your USFWS account and contact the appropriate NOAA office to get endangered species information early in the process.
- And finally, facilitate early consultation with resource agencies.

Slide 23 – Post Award Requirements

Joan Keiser: Now we'll move onto the post-award requirements. Pursuant to the FOA, the USDA will require applicants to adopt and adhere to the following environmental reporting requirements and guidelines:

- You must inform the USDA if there are any deviations from the proposed project plan after obligation. USDA must approve any change and will engage the environmental staff to confirm compliance.
- And again, If additional information is required after an application is accepted for funding, funds can be withheld by the agency under a special award condition that requires the awardee to submit additional environmental compliance information sufficient for the USDA to assess any impacts that a project may have on the environment.

Slide 24 – Sites and Routes

Joan Keiser: Now we will dive deeper into understanding and creating your site and route descriptions to give you a little better understanding of how to create a site or route description.

Slide 25 – Navigating to Site/Route Descriptions

So how do you navigate through the site and route description? Keep in mind you should have already named and drawn your sites and routes on the construction map before starting on the descriptions. You do start by going to the environmental tab as you can see on the screen. Then, go to the site and route description page. Keep in mind, a route is the path in which the proposed technology will be installed in. Sites will include assets such as new or existing facilities, towers, parking lots, access roads and large cabinet installations. Installation of network and access equipment, antennas, or small cell equipment at an existing facility must be included as a site on the construction map.

Better inform the environmental review process, applicants may create multiple routes to delineate different technology types and installation methods. Before I start you create a site or a route, keep in mind, you don't really want to turn on all 14 of the layers on the construction map at the same time when you zoom in.

Slide 26 – Creating Site/Routes

Joan Keiser: Creating sites and routes. Let's just take a quick look at the map and the menu. The first thing you do, click the menu in the top left corner of the construction map (the three horizontal lines). Then, click sites & routes on the menu to display the sites & routes tables on the top right of the screen, which you see here. To add a site, click add site or route under the sites & routes heading. Click the site/route name field, and enter an applicable site or route name. As these site or route names are referenced throughout this section of the application, applicants should use descriptive and concise names whenever possible. This will reduce the potential for errors.

Another helpful tip for applicants to consider is to name sites and routes with a common naming convention which includes the affiliated service area and/or common network facilities. Next,

click the project location type drop-down menu, and then select site or route depending on the project location type. If you select route, the “Please Specify the Width of the Route” field will appear with a default value of 75 ft. You can edit this field for a value between 25 and 500 ft. Click “save” to save the site or route and proceed to drawing its location on the map. Alternatively, applicants can create all the sites and routes before drawing them on the construction map.

Slide 27 – Drawing Sites & Routes

Joan Keiser: To draw a site or route, first select the site or route’s name on the sites & routes table. Once selected, the site line item appears highlighted in blue. Before starting the drawing, applicants may want to zoom in to the portion of the map where the site or route will be located to optimize your drawing precision. After choosing the site or route, use the drawing tools on the right side of the map to draw the site. Include a reasonable buffer when drawing the routes. Do keep in mind, the polyline will not be available for drawing sites. The polygon, rectangle, and circle tools will not be available for drawing routes, and remember, to better inform the environmental review process, applicants may create multiple routes to delineate different technology types and installation methods.

Slide 28 – Understanding Site/Routes Descriptions

Joan Keiser: After you’ve created all sites and routes and drawn their respective shapes, you must enter descriptions for each site and route. Project site and route descriptions will specify the types of facilities to be built or upgraded at each location and the estimated environmental and regulatory impact from construction or installation activity. Applicants cannot enter a description for a site or route before they create it in the construction map.

This section must be completed before the applicant begins the environmental questionnaire, or EQ section, because the information provided in this section will determine the requirements for the EQ section.

Slide 29 – Creating a Site/Route Description

Joan Keiser: To add a site and route description, you click the site/ route descriptions link on the application system menu. The site descriptions and route descriptions page will display. As you see here. Any site(s) and/or route(s) previously drawn on the construction map, will be listed in the table. Click “Edit Description” next to the applicable site to enter a description.

Slide 30 – Creating a Site/Route Description (Cont.)

Joan Keiser: The application will ask a series of question for each site and route, and those questions include:

- “Is the proposed site located on or does it cross tribal land(s)?”
- “Is the proposed site located on or does it cross federally managed land(s)?”
- “Is the route new or upgrading / rebuilding existing telecommunication facilities’?”
- “Is the route in a previously-developed, existing right-of-way?”
- “What is the installation method?”
- “Will associated cabinets or underground vaults be installed nearby in previously-disturbed or developed land?”

Slide 31 – Example 1: Large Enclosure Cabinet

Joan Keiser: Now we're going to walk through two different examples of completing types of descriptions. First example is how to complete the description for a large enclosure cabinet. This is a new site option available in this round. We added this as an option in the system to account for equipment located in the large enclosure cabinets. After that, I'll walk through how to complete the description for a tower, which is a bit more complex.

So again, for the large enclosure cabinet:

- From the site description page, under the New Asset Section, click the "Name" field and enter the applicable name for the large enclosure cabinet.
- Click the "Type" field drop-down menu, and then select large enclosure cabinet.
- Finally, click the Add and Continue button.

Slide 32 – Example 1: Large Enclosure Cabinet (Cont.)

Joan Keiser: The cabinet's name description page displays. So, you'll need to select the applicable response to the following questions:

- "Is this an existing cabinet or a cabinet to be constructed?"
- "Will there be any improvements made to the existing cabinet?"
- "Is the applicant proposing to install any network & access equipment in this cabinet?"

If you answer yes, please select the type of equipment that will be installed.

Select all that apply." The options include: antenna, batteries, and/or rack-mounted equipment.

Then, Click the Save and Continue button. The Return to Site button will display so click the Return to Site button. The site description page will display again. Repeat all of the previous steps within this section for any other asset types. The recently added asset appears under the large enclosure cabinet table. The following options display for that asset: Hit "Describe" to edit the previous answers or "Delete" to remove the asset.

Slide 33 – Example 2: Tower

Joan Keiser: Now, we will walk through how to add a Tower. On the site description page, under the new asset section, click the "Name" field and enter the applicable name for the tower. Then, click the "Type" field drop-down menu, and then select "tower." And finally, click the Add and Continue button.

Slide 34 – Example 2: Tower (Cont.)

Joan Keiser: The tower's name description page displays. You'll select the applicable response to the following question: "Is this an existing tower or a tower to be constructed?"

The example on the screen is for a new tower because we chose "To be Constructed."

When you select, "To be Constructed," you'll have to answer what type of tower is going to be built. You're going to select "Guyed Tower." The following message displays: "Please indicate the total limits of disturbance that will be required (in feet.)" You'll enter the applicable length, width, and depth in the corresponding fields. Then answer the next question: "Is the land or this tower or pole currently owned by the applicant, leased or to be purchased?"

If you click "Leased", an upload field will appear which is where you'll upload the applicable tower lease agreement document. The next question then comes up, "Is an FCC license required for this tower/pole?" Just select the applicable response. Then answer, "What is the height of this tower/pole (in feet)?" Again, choose the applicable response. The next question is:

“Is the applicant proposing to install any network & access equipment on this tower/pole?” If you answer no, just go to Step 10, which is going to ask the following question: “Is the Applicant proposing to install a generator at this tower/pole?” If you answer yes, select all types of equipment that will be installed by checking the applicable checkboxes. Next a question comes up: “Are you collocating, upgrading, or installing a new antenna?” Again, chose the applicable checkbox responses. And finally: “Is FCC license required for any of this equipment?” Just answer the question.

Slide 35 - Example 2: Tower (Cont.)

Joan Keiser: Another question then comes up and this is the one about the generators “Is the applicant proposing to install a generator at this tower/pole?” If you answer no, just continue STEP 15 to save the entered information and return to the site description page. If you answer yes, that you do propose to install a generator then proceed to the next step. You’re going to need to answer questions about the generator. First is, “How many generators will be installed at this tower/pole?” Just provide the answer. The next question is: “Please select the type(s) of generator(s) that will be installed:” You can select either the type as either Back-up generator or primary generator. You can select both types of generators. Next Up: “What is the installation method for the generator(s)?” Again, using the checkbox(es), click all applicable answers. Regardless of which answers you pick, you will be asked the following. “Please indicate the total limits of disturbance that will be required (in feet)” Input the applicable length, width, and depth in the corresponding fields. Click the Save and Continue button. That will return you to the route and site page displays. Then, click the return to site button. Finally, the site description page displays. Repeat all of the previous steps within this section for any other to be constructed towers asset types. The recently added asset appears under the towers table and you have the following options: “Describe” to edit the previous answers or “Delete” to remove the asset.

Slide 36 - Available Resources for Applicants

Joan Keiser: Here are some available resources for applicants to find more information on the environmental section of the ReConnect application, First up is:

- 7 CFR 1970 – Title 07: Agriculture which is available at the link on the screen.
- Environmental Questionnaires for specific subparts of the 1970
- Environmental Regulation.

As mentioned earlier, these EQs are available now on the ReConnect website under the Forms and Resources section. In addition to the hyperlinks located in each EQ, RD’s entire regulation, subparts, guidance and templates can be found online at <https://rd.usda.gov>. USDA Rural Development is providing resources and technical assistance to applicants as they prepare to apply for the ReConnect Program. You can view and register for upcoming events on the ReConnect website. RD plans to continue facilitating webinars addressing Frequently Asked Questions and specific aspects of the application. Past webinar materials are available on the ReConnect website. The ReConnect website is also a great resource for additional information. It contains program details, fact sheets, and technical assistance materials that can be used when developing applications. Also be sure to review the full FY2020 Funding Opportunity Announcement (FOA) located under Forms and Resources.

And please do note, resources and information on the site will be continuously updated and added to as we approach the application window. Please be sure to check back often.

USDA is maintaining a Help Desk to respond to questions submitted through the ReConnect website. And finally, USDA encourages you to reach out to your General Field Representative (GFR) for more guidance related to your unique project and community.

Slide 37 - Q&A

Joan Keiser: This concludes the Environmental Overview webinar, and now we'll take a few minutes to answer your live questions from the audience. First, I'd like to introduce Kristin Lough, Operations Branch Chief for the Telecommunications Program and Olivia Tuttle of the ReConnect Support Team. They'll be facilitating today's Q&A section.

Olivia Tuttle: Hello, I am Olivia Tuttle, and I am joined by Kristin Lough, as Joan just mentioned. I'm going to read through the submitted questions, and Kristin will answer them as time allows. If we do not get to your question during today's presentation, please submit it through the "Contact Us" form on the ReConnect website and we will follow-up accordingly.

Before we get started, I would like to mention that if you have any very specific applicant questions, please submit them to the Contact Us form on the ReConnect website to get an individualized response. And, I'll just go on ahead and read the first few questions that I can go on ahead and answer. Then, we'll move on to asking some questions of Kristin.

Olivia Tuttle (Q): The first, can a previous environmental study be used in the application process if it covers 90% of the PFSA?

Olivia Tuttle (A): An applicant must provide an environmental analysis of all Proposed Funding Service Areas within an application to be eligible. A recent environmental study could be used to satisfy or support the environmental information requested but additional information will be required for areas not supported by the existing study at the time of the application. You should also note update any changes since the current study so all current environmental information is represented within the application.

Olivia Tuttle (Q): Next question, what will be required for the environmental portion of the application, are maps required of the planned routes if claiming categorical exclusion?

Olivia Tuttle (A): The answer to that is that project maps, or site plans, are required to identify cable routes, building locations, tower locations, equipment locations, and all other structures and facilities that are part of the project. Applications will be required to draw sites and routes using the construction mapping tool in the ReConnect Application System. The Application System will also require that applicants provide specific information on the cable routes and facility location including the completion of environmental questionnaire. All project activity specific project locations and supporting documentation must be provided to assist the agencies analysis of potential impact on the environment including whether a categorical exclusion applies to an area in a proposed project. The application guide will also address the specific requirements of the environmental portion of the submission and will be available with the Application System goes live.

Olivia Tuttle (Q): The next question, if an area is predominately national forest but people live there and an applicant wants to place a tower structure. Does the applicant work with the national forest or just the private owner?

Olivia Tuttle (A): The answer to that is if the map shows the area as Forest Service property, the applicant must work with the Forest Service unless the applicant has proof of it on private

property. The specifics of the property will need to be analyzed and the applicant must prove that the property is truly private and not Forest Service owned.

Olivia Tuttle (Q): Does an applicant need to hear back from USDA about EA or EIS before submission?

Olivia Tuttle (A): Yes. If you indicate "Yes" for either the Environmental Assessment (EA) or Environmental Impact Statement (EIS) questions. The system will require an upload as proof that the applicant has you contacted USDA.

Olivia Tuttle (Q): The next question we have here is, where do I find a professional cultural resources consultant over to Vermont? Kristin can you answer that for us?

Kristin Lough (A): Sure. So this is also identified in the Environmental Questionnaire, underneath section 106, but if an applicant chooses to use a consult cultural resource contractor, we can't recommend the consultant to use. However, the contractor must meet the Secretary of Interiors professional qualification standards used by the National Park Service. And, we'll provide a URL to the professional quality standards for all of the viewers to reference.

Olivia Tuttle (Q): The next question we have here, when drawing routes on the construction map should it be on a specific side of the road for planned construction or just on the road where the construction will take place? Because during construction, sometimes the landowner will not give rights away to cross their property and then the cable has to be re-routed to the other side of the road

Kristin Lough (A): That's a very good question. So as part of the Construction Map process, when you're drawing or uploading shape files of your sites and routes. One of the items you're going to have to answer, under the route, you'll be required to specify the width of the route. The field appears at a default value of 75 feet, applicants can edit a field for a value of 25 feet and 500 feet. So, it's up to the applicant. If you believe you might not be able to receive the right of way on the one side of the road and what you're proposing. You should buffer at a greater value so that Environmental Review covers both sides of the road.

Olivia Tuttle (Q): Okay, we have another question here, if a large cabinet is to be located within the existing right of way where we are proposing to place fiber. Do you still have to show the large cabinet as a site?

Kristin Lough (A): No, there is a question that is asked during the route description process. Will cabinets or underground vaults be installed or previously disturbed or developed land? You'll be drawing the large enclosure cabinets under the site only.

Olivia Tuttle (Q): The next question, what is the definition of a large enclosure cabinet?

Kristin Lough (A): So there is no clear definition between a large enclosure cabinet or a smaller enclosure cabinet akin to a handhold. For that reason, in addition to identifying the two different types of cabinets we included hyperlinks inside of the system which will bring you to images of the difference between a smaller handhold cabinet or a large enclosure cabinet. But, essentially, what we're looking for is a large enclosure cabinet that is including additional network and access equipment that is financed using RUS funds or includes a generator or something like that.

Olivia Tuttle (Q): Okay, we have another question here, in Round 1 zoom worked for some layers at 600ft but not for others. Are there recommended zoom levels for each layer?

Kristin Lough (A): So with both of the Service Area Mapping Tool and Construction Mapping Tool, we're leveraging a number of different web map services. Unfortunately, depending on which source is the source of that web map service is whether or not we can programmatically change the zoom level of that web map service. So for example, the floodplains is available from FEMA. Unfortunately, the applicants have to zoom in very close to the site or route that uploaded to see whether or not there's overlap with one of the FEMA identified flood plains. With some of those layers, if we're able to find a secondary layer that could be also used or helpful in support of the primary layer. We also provided that.

So for example, we also have a flood frequency layer which we are now leveraging every posted flood frequency layer where the data is coming from NRGs soil data. And we were able to adjust the zoom so that you'll be able to see the difference of current flood classifications for frequency at a much higher level than you would using FEMA floodplain levels.

Olivia Tuttle (Q): The next question we have is about shape files, can you speak to the process of creating and upload shape files?

Kristin Lough (A): Sure. So for the Construction Map when you are drawing a route or uploading a shape file of the route, you can include either a polygon or a polyline or polylines. So if you're including a polyline, the one thing that you don't want to do is contain or have the shape files contain self-intersecting polylines. That will generate an error message in the map. Additionally, if your shape file includes a feature where the polylines are incredibly close to each other and we're buffering because when we end up opening up the shapefile and the system writes it to our data warehouse it's getting buffered and stored as a polygon. If any of the polygon boundaries end up intersecting with each other, there will be an error associated with that polygon and you'll have to upload a new shape file.

If you want specific specs associated with the shape files, we can send that out after the webinar.

Olivia Tuttle: We're going to give it a few more minutes. Again feel free to submit additional questions at this time. While we are taking additional questions I like to just mention we will have our next webinar on Feb 5th at 1:00 pm EST and that will cover the application system. We would also like to mention we have several upcoming workshops that you can view and register for on the ReConnect Website under the "Events" page. So please be sure to look at the upcoming events.

Kristin Lough: One more item to note. We'll be encouraging this at different workshops and also the webinars. We are tweaking some of the language in each of the three Environmental Questionnaires. So if you've already downloaded EQs for Round 2. Please, go back to the website and they will be made available on or before January 31st. It's not going to involve a significant level of effort. If you have already completed EQs that are on our website today. Again, based on our experience for Round 1, we tried modifying the language to make we're capturing exactly what information is required in order to expedite the Environmental Review process.

So there was a follow-up question, saying that I didn't dive into the actual process of creating shapefiles. That's a little more complex. It depends on the software you're currently leveraging whether it be ARC map or ARC GIS pro kind of thing. So if anyone has specific questions on

how to create shapefiles in order to upload them into the system. They can certainly follow-up with me directly and we can go through the process.

Olivia Tuttle: You can go ahead and submit any questions. Okay, if there are no additional questions, we can go ahead and wrap this up for today. Again please look out for the ReConnect website for the upcoming webinars and workshops. Thank you for participating in today's event.