



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov/espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Redwood County Broadband Development Project

Responsible Entity: Redwood County, MN

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: CARE-21-0001-0-FY21

Preparer: Bob Rogers, Bolton & Menk, Inc.

Certifying Officer Name and Title: Jim Salfer, Chair, Redwood County Board of Commissioners

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Bolton & Menk, Inc.

Direct Comments to:

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Redwood Falls, MN 56283
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Project Location:

The Proposed Project is located within the entirety of the City of Sanborn and Charlestown Township, both of which are located within Redwood County, Minnesota.

Cities: Sanborn

Townships: Charlestown

See Appendix A, Figures 1-3

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Proposed Project would expand broadband services throughout the City of Sanborn and Charlestown Township, particularly within underserved or unserved areas. The Proposed Project seeks to address the need for improved broadband connectivity for City of Sanborn and Charlestown Township residents and businesses by improving and expanding the existing infrastructure and installing last mile components on properties within the Project Area. Underground broadband fiber lines would be installed by temporarily excavating within previously disturbed right of way, adjacent land next to roadways, and residential yards. Excavation activities will occur in previously disturbed ground and potentially some undisturbed ground and may include restoration and/or repair of disturbed ground, utility connections, and the like. The grant funding would provide these connections to residential properties. Any non-residential locations would be encouraged to be served by the internet service provider, and these locations—as well as any middle mile or distribution fiber used solely for these locations—would be fully funded by the internet service provider and would not utilize grant funding.

The Proposed Project will provide access for residents who do not have other resources available for broadband assistance. The Proposed Project would expand the existing infrastructure and facilities to reach more residents and would not duplicate the efforts of any other planned or completed project. The proposed average speed will be 1000 Mbps for download and upload. The total project cost is \$1,715,607.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

There is a need for increased broadband infrastructure in the City of Sanborn and Charlestown Township in order to provide unserved and underserved residents with sufficient internet connectivity. According to the Minnesota Office of Broadband Development, Redwood County was recently ranked 62nd out of 87 counties for the percentage of households served with broadband in the State of Minnesota. Therefore, closing the inequity gap for broadband services in Redwood County is one of the County's top priorities.

The City of Sanborn and Charlestown Township are very rural municipalities in Redwood County, with an emphasis on home-based business, farming, and teleworking. Broadband service within the Project Area is insufficient and does not have the fiber network access required to support bandwidth speeds necessary to fulfill these activities. Unequal opportunity resulting from a lack of quality internet service has been accentuated during the COVID-19 pandemic, when many City of Sanborn and Charlestown Township residents found they were unable to work from home, conduct telehealth, and provide distance learning due to insufficient internet speeds.

Existing Conditions and Trends [24 CFR 58.40(a)]:

Locations that would receive broadband installation are primarily comprised of previously disturbed right of way, adjacent land next to roadways, and residential yards. If it is determined that broadband installation will occur on previously undisturbed ground, potential effects and impacts will be investigated, and mitigation steps will be defined at that time. 90.7 percent of the Project Area is categorized/zoned as residential, and US EPA EJScreen tool estimates that approximately 31 percent of the Study Area population is listed as low income.

Arvig, Minnesota Valley Telephone Company, and Nuvera provide existing internet service infrastructure and facilities within the Project Area. However, as described above in “Statement of Purpose and Need for the Proposal,” additional broadband infrastructure within the City of Sanborn and Charlestown Township is needed in order to provide unserved and underserved residents with sufficient internet connectivity. Table 1, below, shows the current and proposed download and upload speeds of the project area.

Table 1. Current and Proposed Download and Upload Speeds for the Proposed Service Area

Community name	Current average speed		Proposed average speed	
	Download	Upload	Download	Upload
City of Sanborn	28 Mbps	2 Mbps	1,000 Mbps	1,000 Mbps
Charlestown Township	28 Mbps	2 Mbps	1,000 Mbps	1,000 Mbps

**Speed is listed in Mbps (Megabits per second)*

Funding Information

Grant Number	HUD Program	Funding Amount
CARE-21-0001-FY21	Community Development Block Grant COVID-19 (CDBG-CV)	\$1,715,607 (Broadband portion of grant)

Estimated Total HUD Funded Amount:

\$1,715,607

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

CDBG-CV grant for broadband infrastructure: \$1,559,643
Potential Internet Service Provider Debt Commitment: \$500,749
CDBG-CV grant for admin: \$155,964
Total: \$2,216,356

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Proposed Project is not located within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The closest airport is the Springfield Municipal Airport (D42), located approximately 5.5 miles from the Project Area. See Appendix B.1
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Project Area is not located within a Coastal Barrier Resources System Unit.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Proposed Project would not involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property. See Appendix B.3
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Proposed Project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities or five or more dwelling units. See Appendix B.4
Coastal Zone Management	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Proposed Project is not within a Coastal Zone. The State of Minnesota's only Coastal

Coastal Zone Management Act, sections 307(c) & (d)		Boundary is located along the northern shore of Lake Superior. See Appendix B.5
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No X <input type="checkbox"/>	Potentially contaminated sites may be near the locations of broadband line installation. These sites will be reevaluated once the specific broadband installation locations are known, and mitigation measures will be established as necessary. See Appendix B.6
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No X <input type="checkbox"/>	The Proposed Project has the potential to affect federally-listed species and critical habitats that may be present in the Project Area. Once the broadband line installation locations are determined, the impact on endangered species will be investigated further and mitigation steps defined, if needed. See Appendix B.7
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> X	The Proposed Project neither involves development of a hazardous facility, nor includes development, construction, rehabilitation, or conversion that will increase residential densities. See Appendix B.8
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> X	The Proposed Project does not include activities that would potentially convert farmland to a non-agricultural use. See Appendix B.9
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No X <input type="checkbox"/>	100-year floodplains are located within the Study Area, however it is unknown at this time whether specific project activities will occur within a floodplain. Once the location of broadband line installation is determined, floodplain areas will be further investigated for potential impacts. See Appendix B.10
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No X <input type="checkbox"/>	Locations of historic and cultural sites will be further investigated once specific broadband installation locations are known. SHPO and THPOs listed on the T DAT will be consulted. Mitigation measures will be established if necessary. See Appendix B.11

<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>The Proposed Project does not involve new construction for residential use or rehabilitation of an existing residential property. See Appendix B.12</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424€; 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>The project is not located in a sole source aquifer area. See Appendix B.13</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No X <input type="checkbox"/></p>	<p>The installation of broadband lines involves ground disturbance. Potential impacts to wetlands will be investigated further once specific locations for line installation are determined and avoidance, minimization, and mitigation measures will be established. See Appendix B.14</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>No Wild and Scenic or NWSRS Study Rivers are identified within the vicinity of the Proposed Project. The Des Moines River and the Minnesota River are located several miles from the study area. See Appendix B.15</p>
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No <input type="checkbox"/> X</p>	<p>No adverse environmental impacts were identified in any other compliance review portion of this project’s total environmental review. The installation of adequate and affordable broadband internet service would result in a net benefit to minority and low-income populations within the Project Area. See Appendix B.16</p>

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	<p>The Redwood County Comprehensive Plan (2007) recognizes the advancement of telecommunications technologies as a growth and development opportunity for the County.</p> <p>The proposed project supports future land use plans and would not alter or affect existing land uses.</p> <p>See Appendix A, Figure 3, “Aerial Photo,” and Figure 7, “Land Use Classification.”</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<p>Detailed soil, slope, erosion, drainage, and runoff information will need to be investigated further when specific sites are determined. Mitigation measures will be established at that time.</p> <p>See the figures referenced below for overall site characteristics:</p> <ul style="list-style-type: none"> - Appendix A, Figure 2: USGS Location - Appendix A, Figure 4: MPCA Potentially Contaminated Sites - Appendix A, Figure 8: Soils - Appendix A, Figure 9: Geologic Conditions/Groundwater
Hazards and Nuisances including Site Safety and Noise	2	<p>The project will not be affected by the listed natural hazards, air pollution generators, man-made site hazards, or nuisances. It is not a noise-generating facility. Installation of broadband lines will occur during daytime hours in accordance with City and Township ordinances.</p>
Energy Consumption	2	<p>Energy consumption associated with the project includes the energy consumed during broadband line installation and the electricity needed to use the internet after the project is completed. There will not be energy consumed as related to a new or existing building.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	The project will enhance and/or expand employment opportunities due to the improved access to high-speed internet.
Demographic Character Changes, Displacement	2	The project will not contribute to altering the composition of the community. The project will not directly or indirectly displace people, businesses, or community facilities.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	1	The project will positively impact schools and cultural institutions by providing much needed access to broadband. It will enable schools to provide distance learning alternatives and students to access distance learning more effectively when necessary. It will not overcrowd schools or impact safe access to schools.
Commercial Facilities	1	The project will positively impact commercial facilities by providing an option to connect to broadband infrastructure. Private equity and private capital may be used if a business or non-residential property needs to connect.
Health Care and Social Services	1	The project will positively impact health care and social services by providing much needed access to broadband. Providers will be able to offer telehealth to patients.
Solid Waste Disposal / Recycling	2	The project will not generate substantial amounts of solid waste. Minimal waste will likely result from the installation process.
Waste Water / Sanitary Sewers	2	The project will not require wastewater treatment.
Water Supply	2	The project will not use water or impact the local water supply.
Public Safety - Police, Fire and Emergency Medical	2	The project will not put increased stress on public safety services as it is not a housing or other type of building.
Parks, Open Space and Recreation	1	The project will not have adverse effects on existing facilities including causing these facilities to become overloaded. The project will enable these facilities to provide improved services by improving access to broadband.

		See Appendix A, Figure 10 for Outdoor Recreation facilities within the Study Area
Transportation and Accessibility	2	The project will not impede or will have very little impact on transportation or accessibility during construction. Additionally, the project is not a site that people will travel to.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	Once specific locations are determined, proximity to unique natural features will be reevaluated and applicable mitigation measures will be established. The project will not draw water, use a septic system, increase impervious surface, or discharge pollutants during operation. Water resources in the area will be examined further once specific locations are determined. See Appendix A, Figure 5, "Surface Waters & Flood Zones," and Appendix A, Figure 6, "Wetlands"
Vegetation, Wildlife	2	The project will not permanently damage or destroy vegetation. Disturbance from the project from burying broadband lines will be temporary, will primarily be located within existing rights of way and easements, and will be revegetated following construction. The project will not create hazards for wildlife nor conditions which will harm wildlife during operation. State and federally listed species will be reviewed once specific project locations are known.
Other Factors		

Additional Studies Performed: None

Field Inspection (Date and completed by): None

The field inspection will be completed by the internet service provider as part of the installation design.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- Minnesota Department of Employment and Economic Development (DEED)
- FAA, National Plan of Integrated Airport Systems: http://www.faa.gov/airports_airtraffic/airports/planning_capacity/npias/reports/
- US Fish and Wildlife Service (USFWS) Coastal Barrier Resources System Mapper: <https://www.fws.gov/CBRA/Maps/Mapper.html>
- National Oceanic and Atmospheric Administration (NOAA), Coast Zone Management Program: <https://coast.noaa.gov/czm/mystate/#minnesota>
- Minnesota Pollution Control Agency (MPCA), What's in My Neighborhood
- USFWS, Information for Planning and Consultation (IPaC): <https://ipac.ecosphere.fws.gov/>
- Environmental Protection Agency (EPA), Sole Source Aquifers Mapper: <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

- MN Department of Natural Resources (MNDNR), National Wetland Inventory
- National Wild and Scenic Rivers System: <https://www.rivers.gov/minnesota.php>
- Redwood County Comprehensive Plan (2007): <https://redwoodcounty-mn.us/wp-content/uploads/2017/03/Redwood-County-Comprehensive-Plan.pdf>
- National Register of Historic Places Database: <https://www.nps.gov/subjects/nationalregister/database-research.htm#table>
- FEMA Flood Maps

List of Permits Obtained:

Permits needed are currently unknown. All permits will be identified, filed, and obtained after project funds are released.

Public Outreach [24 CFR 50.23 & 58.43]:

Prior to submitting the initial Community Development Block Grants, the City of Sanborn held a public hearing/meeting on February 15, 2022. Notice of the hearing/meeting was published in The Standard-Gazette & Messenger newspaper.

Notice of FONSI and Request for Release of Funds will be sent to the following locations/entities:

- Redwood County Government Center Auditor/Treasurer
- MN Department of Employment and Economic Development
- US Department of Housing and Urban Development
- MN State Historic Preservation Office
- Minnesota Indian Affairs Council
- US Environmental Protection Agency
- Tribes listed for Redwood County on the TDAT
 - o Apache Tribe of Oklahoma
 - o Cheyenne and Arapaho Tribes, Oklahoma
 - o Flandreau Santee Sioux Tribe of South Dakota
 - o Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
 - o Iowa Tribe of Kansas and Nebraska
 - o Lower Sioux Indian Community in the State of Minnesota
 - o Menominee Indian Tribe of Wisconsin
 - o Prairie Island Indian Community in the State of Minnesota
 - o Santee Sioux Nation, Nebraska
 - o Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota
 - o Spirit Lake Tribe, North Dakota
 - o Upper Sioux Community, Minnesota
- Other individuals or groups that have stated interested in the project

Cumulative Impact Analysis [24 CFR 58.32]:

The project will have an overall positive and beneficial impact on the human environment. This project will help the City of Sanborn, Charlestown Township, and Redwood County achieve their vision for broadband – that all residents have access to adequate and affordable broadband. No impacts or minor adverse impacts are anticipated for the natural environment. Factors listed above will be analyzed according to specific project locations as the project progresses. Efforts to minimize and mitigate adverse impacts will be defined once the specific locations of broadband line installation are determined.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

The Redwood County Economic Development Authority (EDA) mission is to be the catalyst for economic growth, job creation, business retention and improving the quality of life in Redwood County; which includes increasing broadband access. In 2021 the County contracted with Lead for America, through the American Connection Corps program for a two-year Fellowship to serve as the County Broadband Coordinator. The work of the Fellow in partnership with the County EDA was to research and analyze the various broadband technologies. Information was gathered from meeting with Internet Service Providers; to include MVTV Wireless, Nuvera, Starlink, Arvig, and Minnesota Valley Telephone Company. Within these meetings existing broadband infrastructure was identified within the city of Sanborn and Charlestown Township. The EDA evaluated case studies by contacting other counties and organizations which were responsible for the deployment of broadband. Additionally, the EDA engaged in meetings held with the Office of Broadband Staff, Minnesota Association of Professional County Economic Developers, Minnesota Rural Broadband Coalition, and the Blandin Foundation Community Broadband Resources (CBR): Accelerate 15-week Program. At the conclusion of these activities it was identified the best option, in most cases, is a fiber-to-the-premises network. The following vision statement was endorsed by the CBR community group, County EDA Board, and County Commissioners:

Every resident and business in Redwood County will have access to an affordable, reliable, high-speed internet connection delivered by a committed community partner, skilled in operating and maintaining a successful fiber broadband network.

No Action Alternative [24 CFR 58.40(e)]:

Under a no action alternative, residents of City of Sanborn, Charlestown Township, and Redwood County that currently experience low or no access to internet will continue to have unreliable, slow, or no access to internet. The need for reliable, high-speed internet has increased due to the COVID-19 pandemic, as the need to work remotely, provide distance learning, and conduct telehealth services rose dramatically.

Summary of Findings and Conclusions:

The preliminary, broad environmental assessment has been conducted for the overall project area. The following topics, laws, and authorities may require reevaluation upon learning the location of the broadband lines: contaminated and toxic sites, endangered species, floodplains, wetlands, historic and cultural sites.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Contaminated or Toxic Substances	Once the location of the broadband line installation is determined, the impact on potentially contaminated sites will be investigated further and mitigation steps defined.

Endangered Species	Once the location of the broadband line installation is determined, the impact on endangered species will be investigated further and mitigation steps defined.
Floodplain Management	Once the location of the broadband line installation is determined, the impact on floodplains will be investigated further and mitigation steps defined.
Historic Preservation	Once the location of the broadband line installation is determined, the impact on cultural resources will be investigated further and mitigation steps defined.
Wetlands Protection	Once the location of the broadband line installation is determined, the impact on wetlands will be investigated further and mitigation steps defined.
Soil Suitability/Erosion	Once the location of the broadband line installation is determined, the impact on soils and slope will be investigated further and mitigation steps defined.

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature:



Date: 8/16/2022

Name/Title/Organization: Bob Rogers, Senior Transportation Planner, Bolton & Menk, Inc.

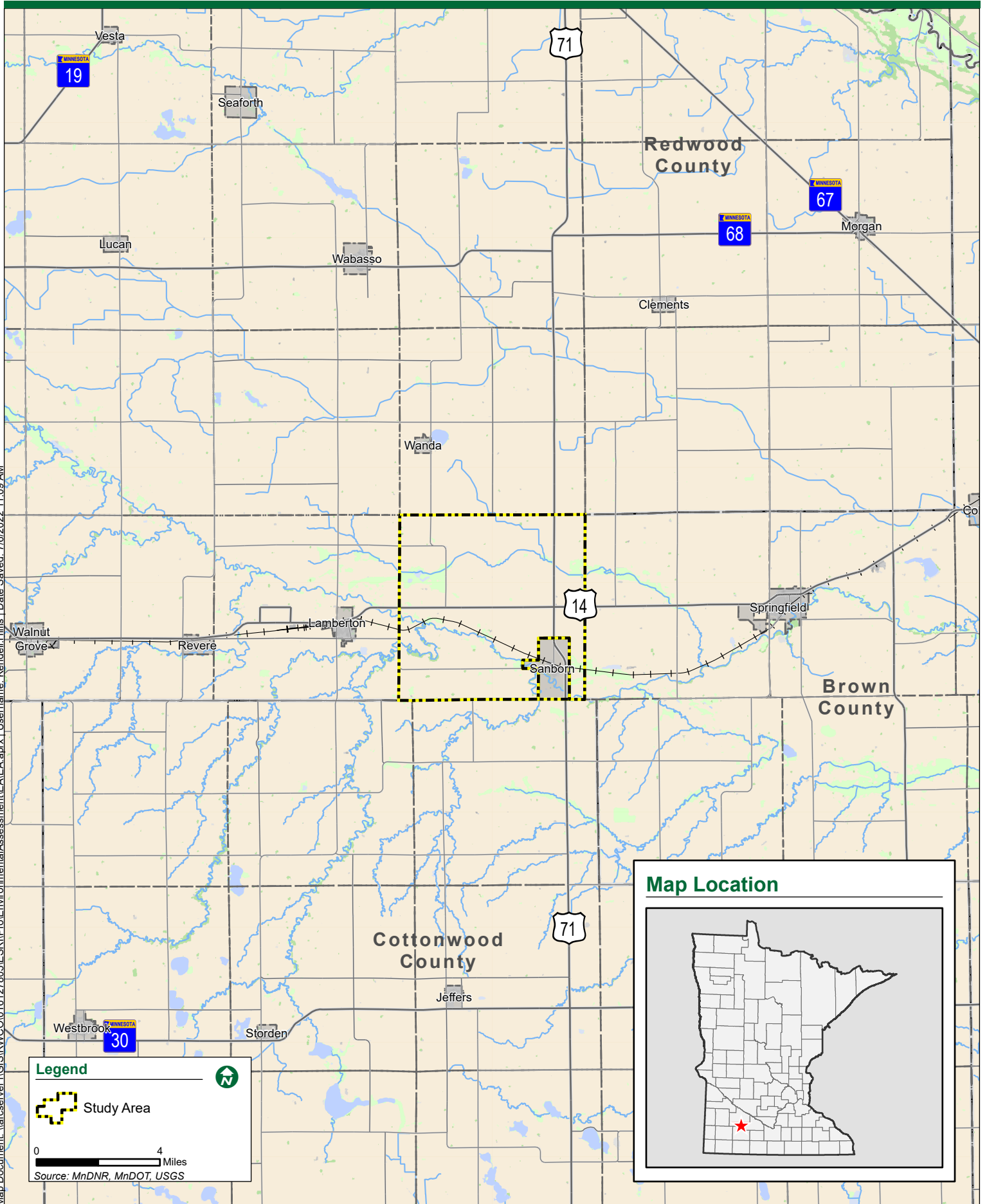
Certifying Officer Signature:



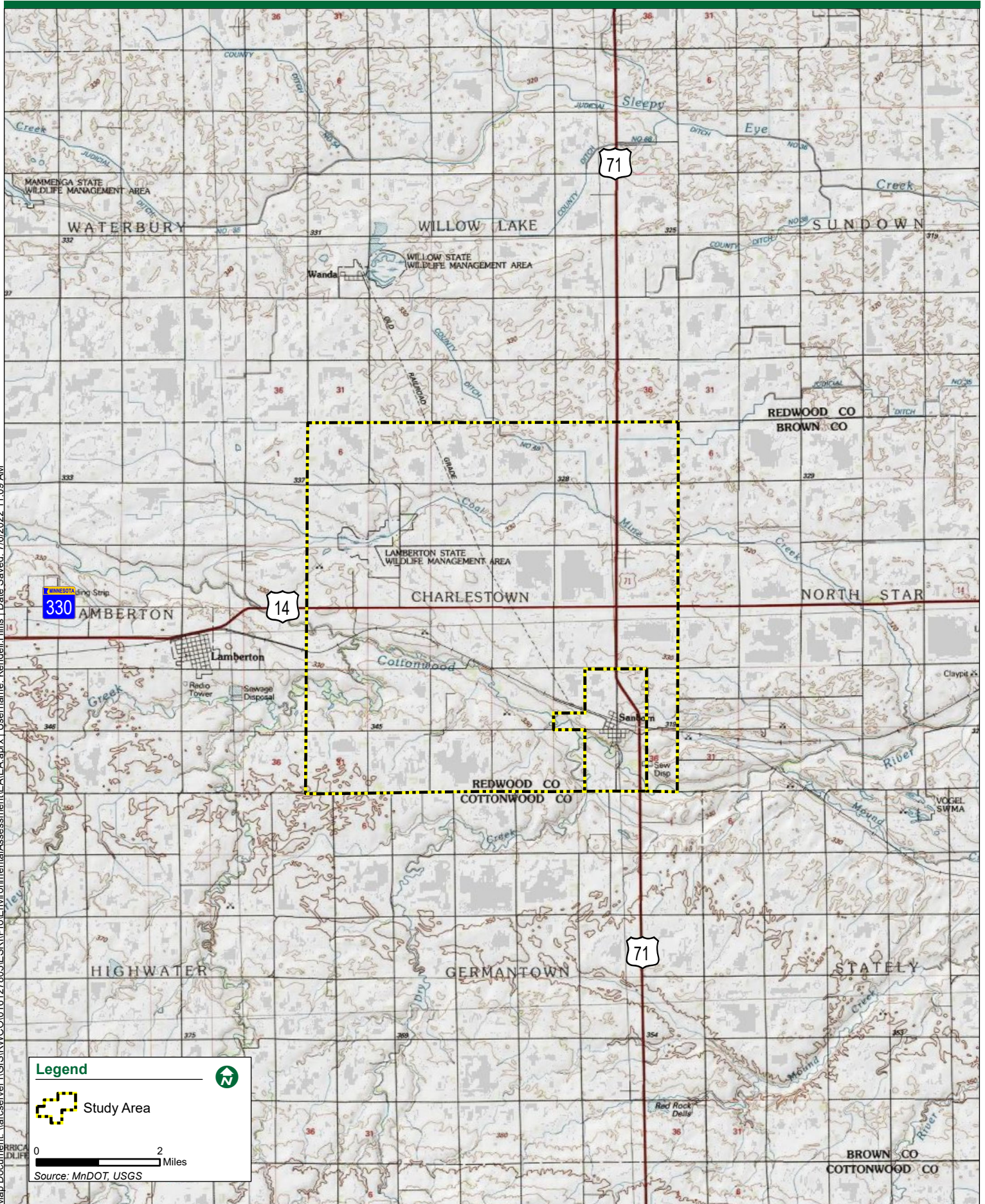
Date: 8-16-2022

Name/Title: Jim Salfer, Chair, Redwood County Board of Commissioners Date: 8-16-2022

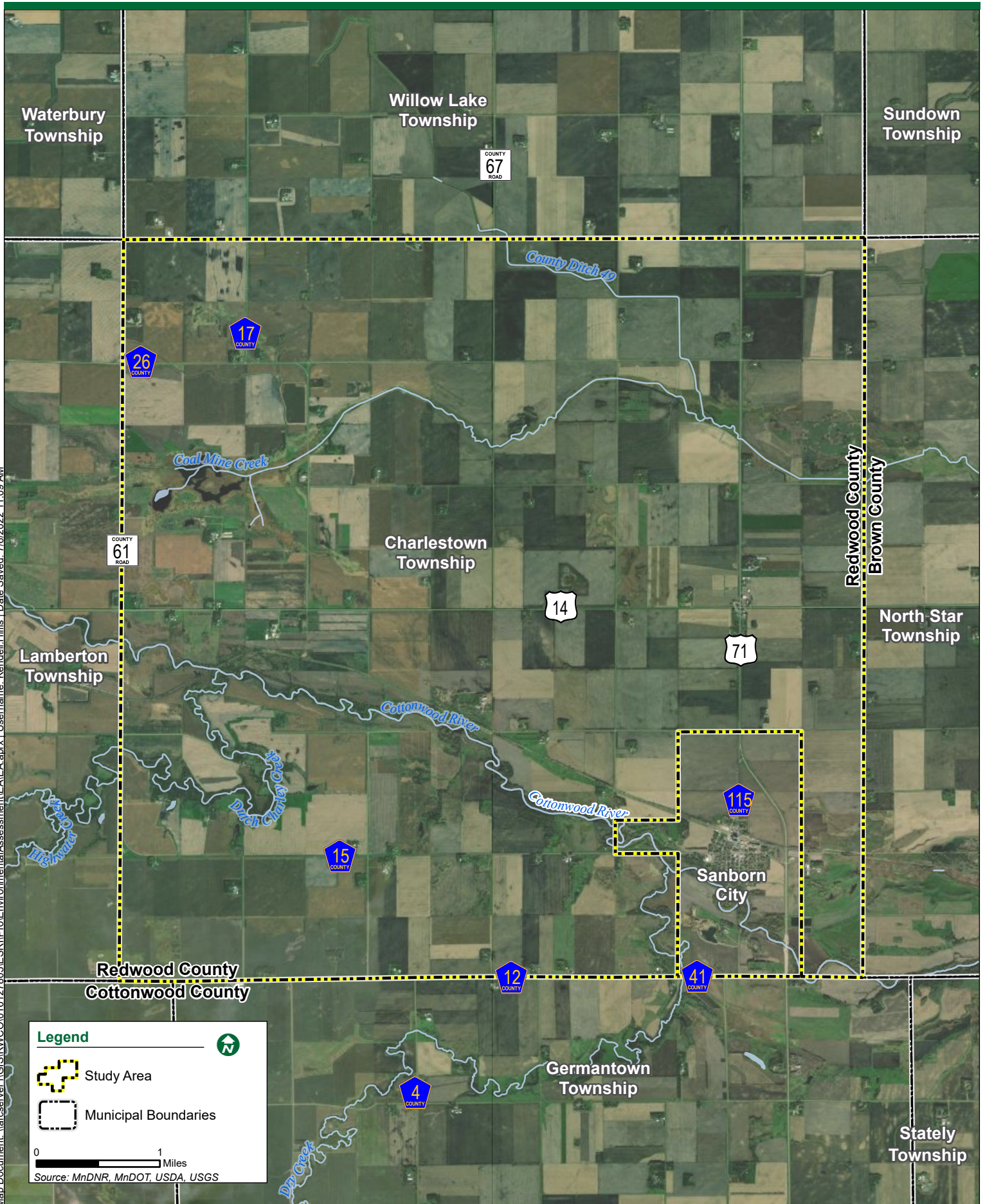
This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

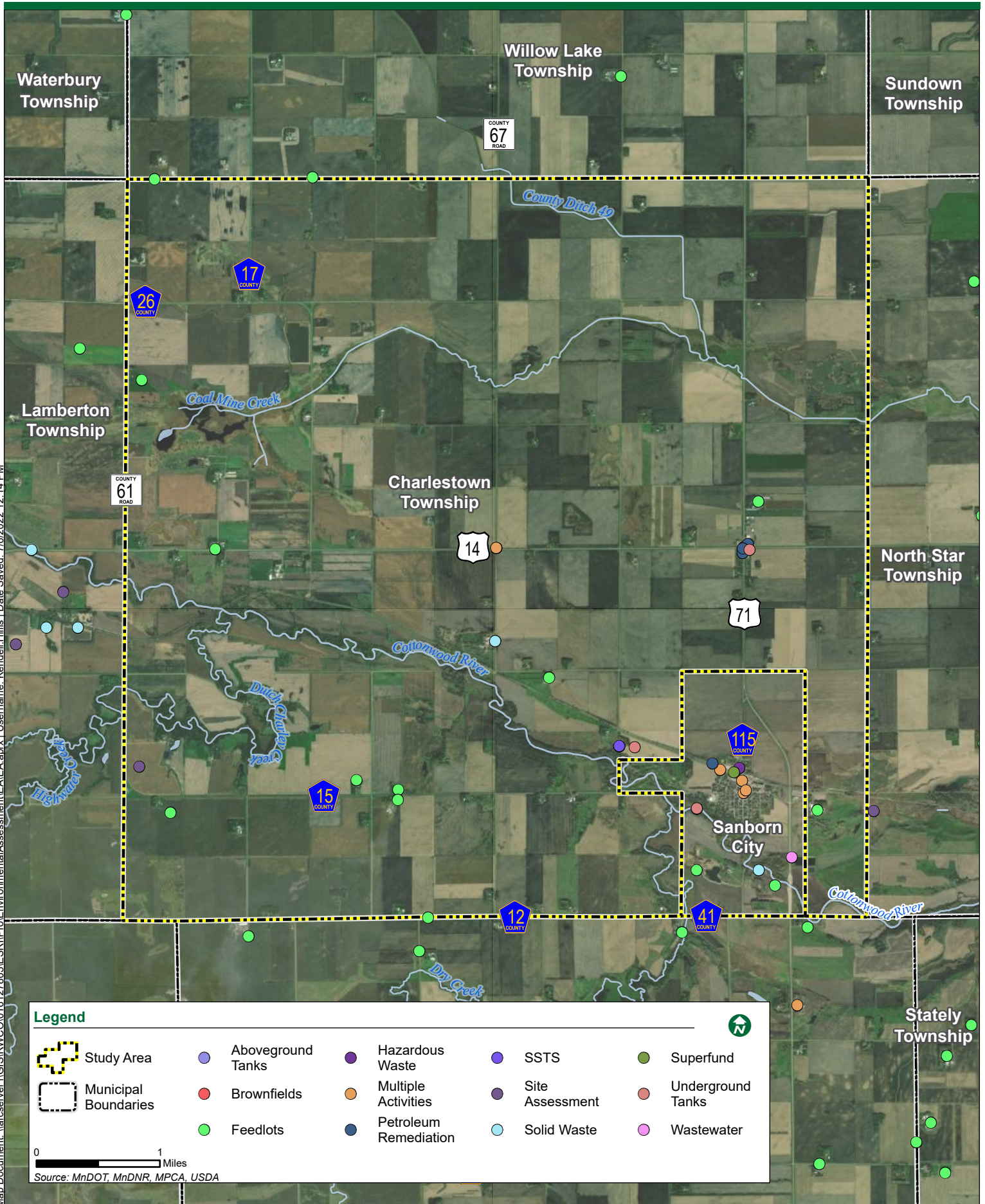


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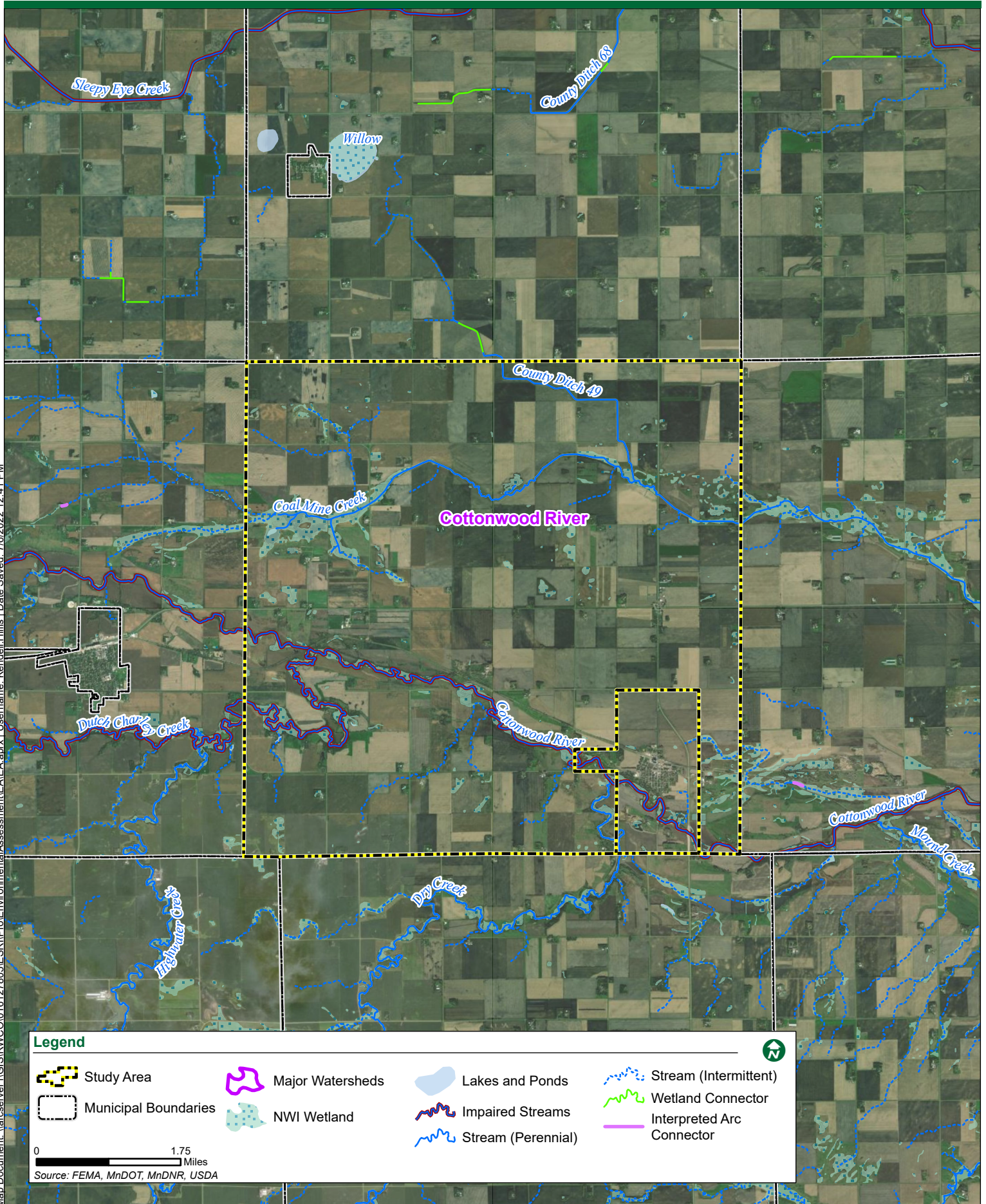


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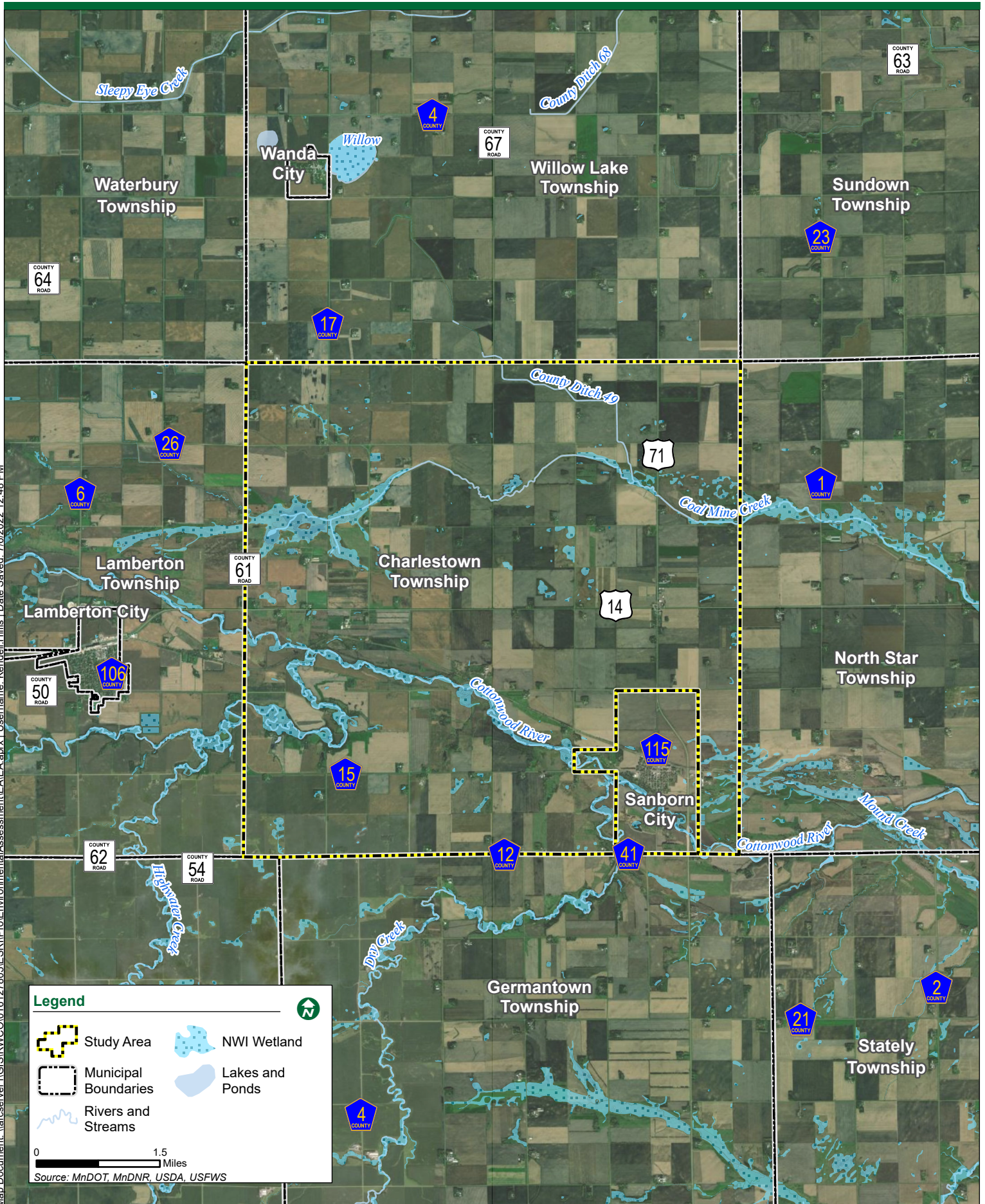




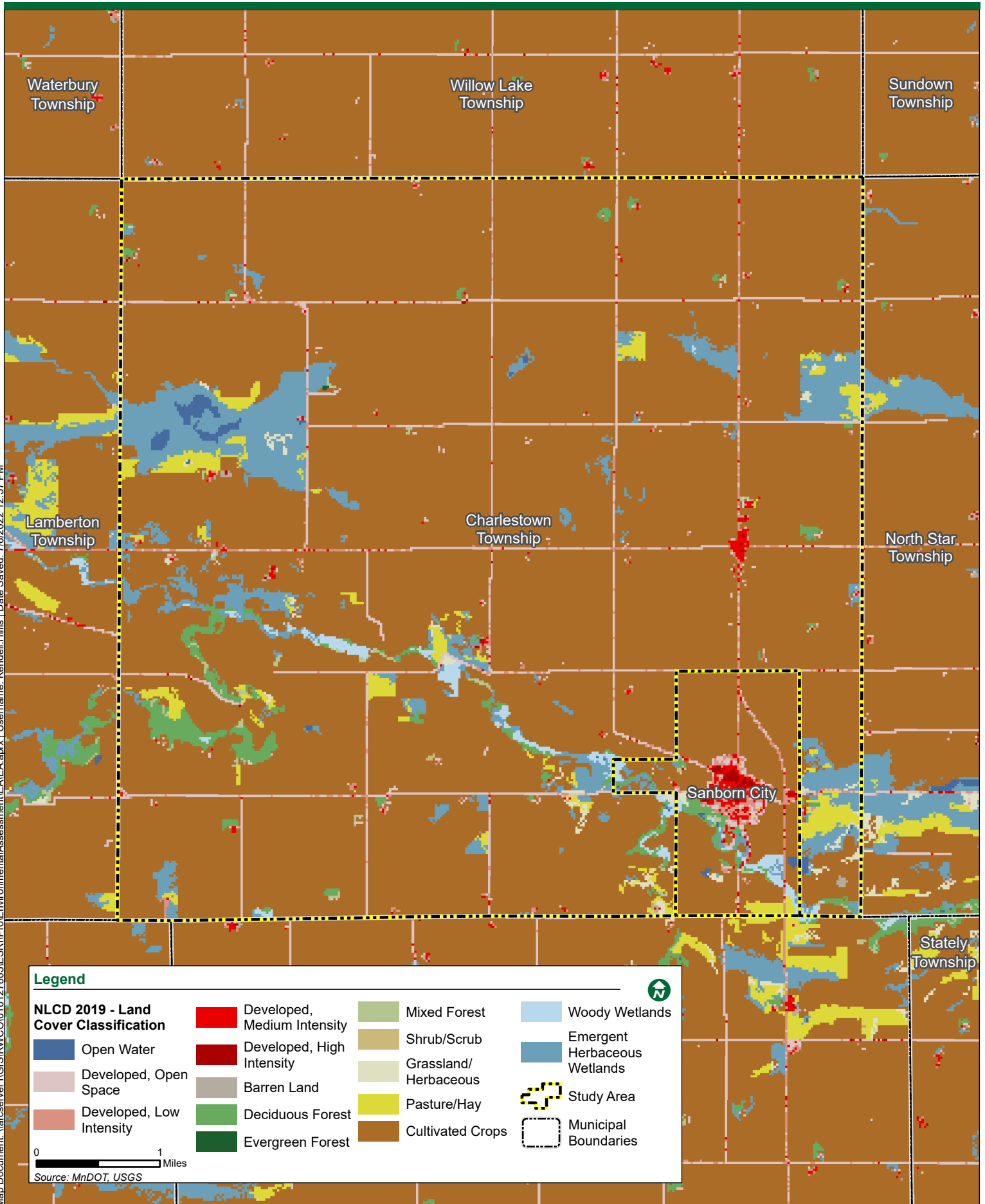
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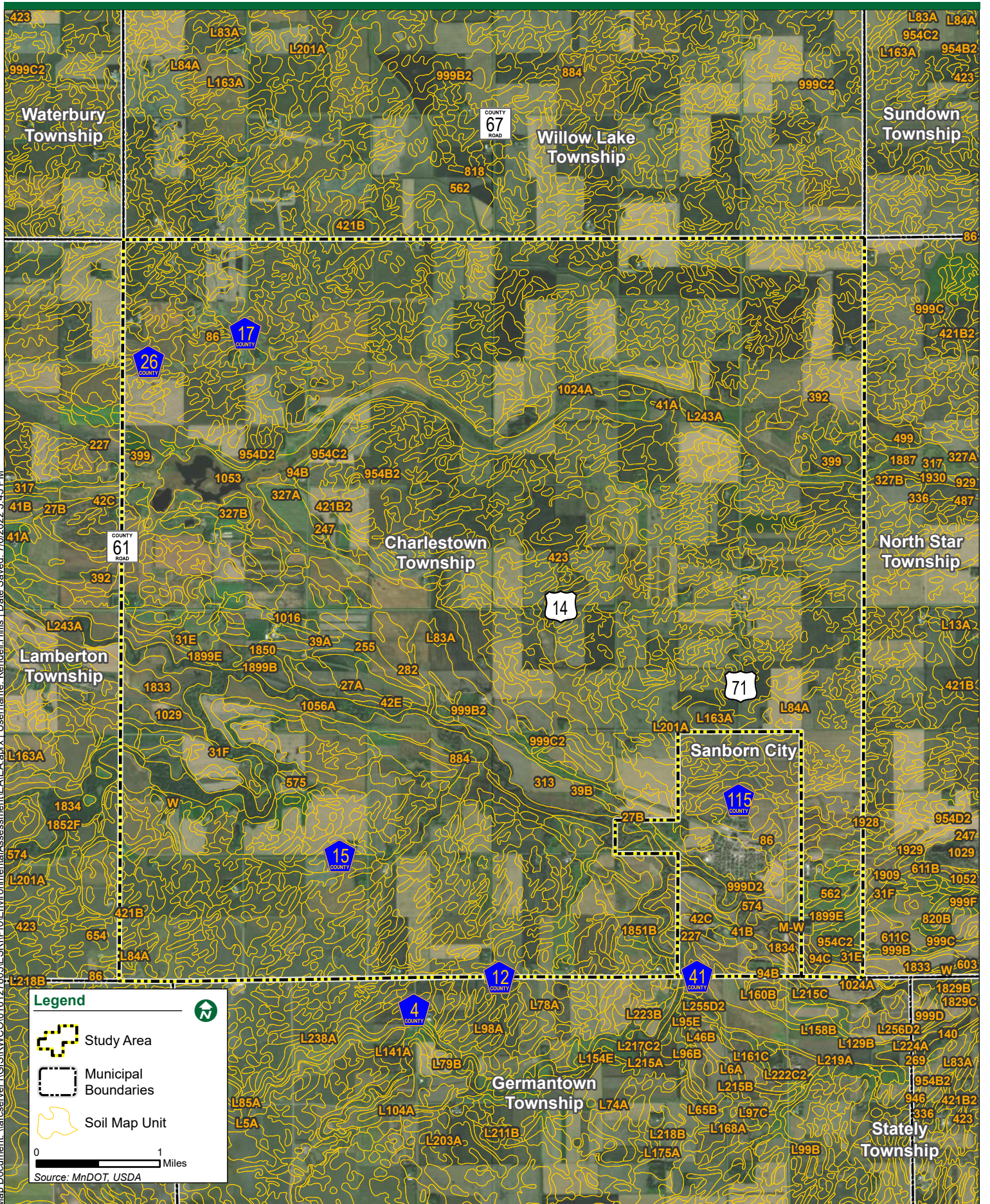


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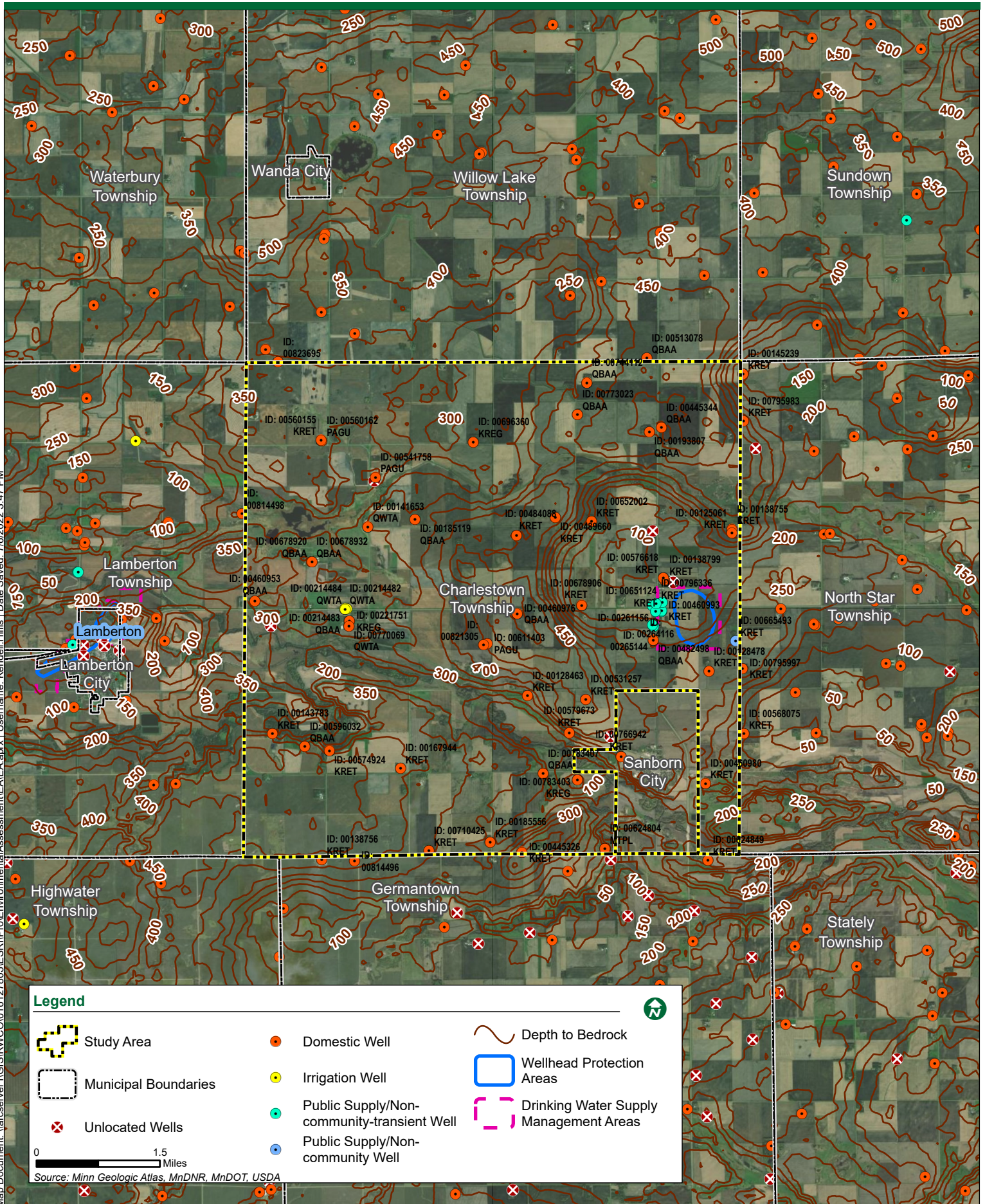
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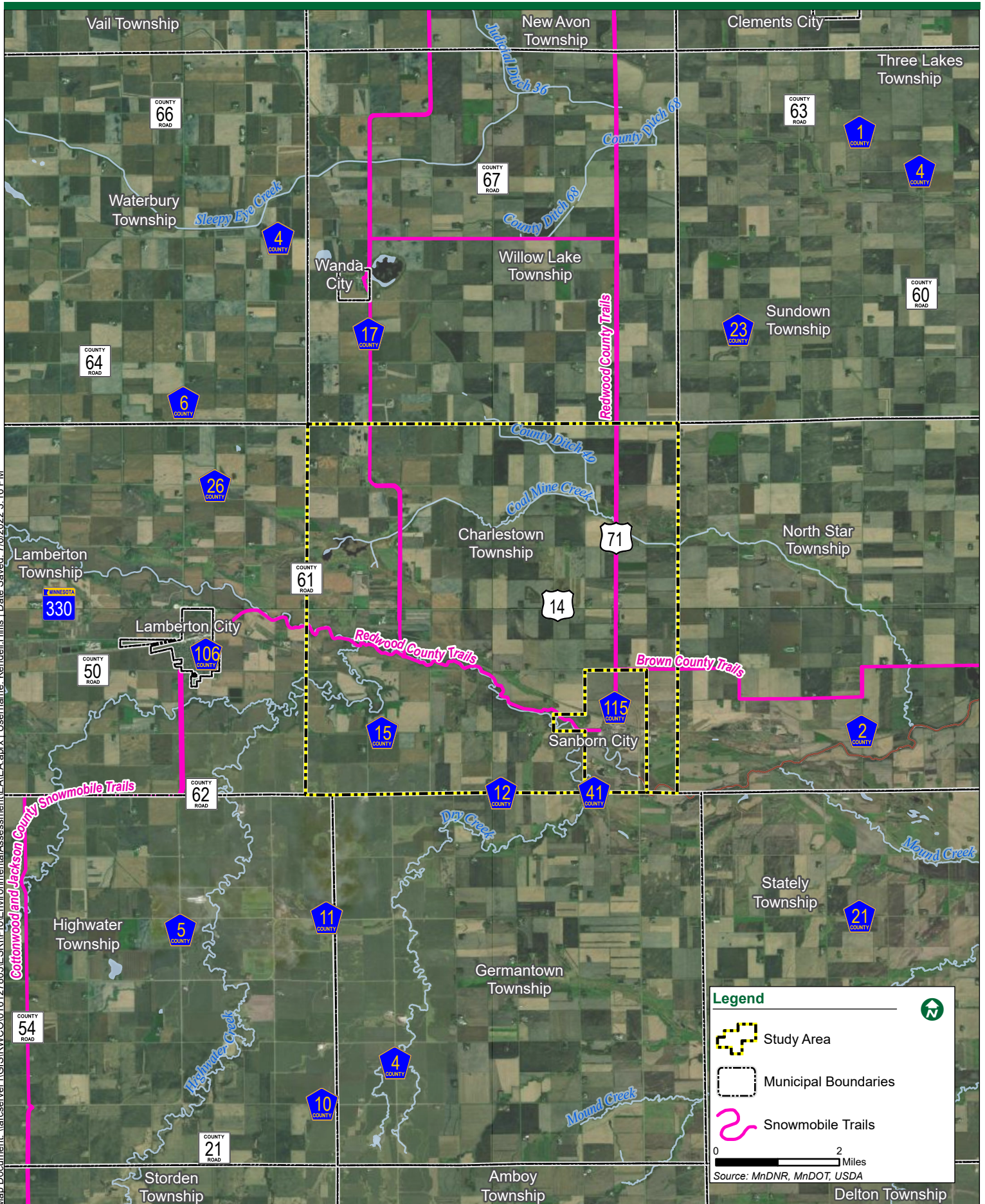
- Study Area
- Municipal Boundaries
- Soil Map Unit

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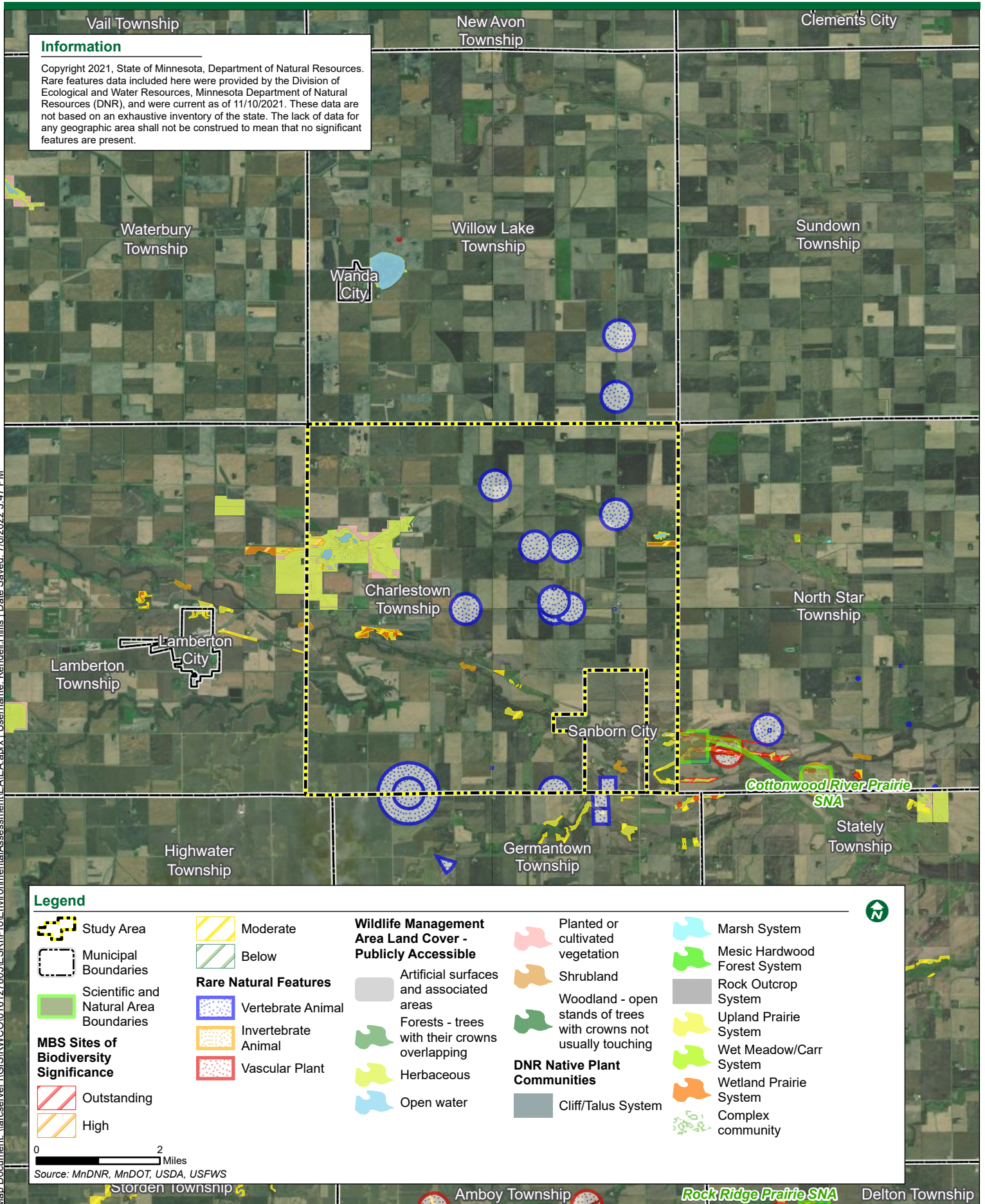
Source: MnDOT, USDA



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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

Appendix B – Section 1

Airport Hazards (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/airport-hazards>

1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes → *Continue to Question 2.*

2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?

Yes, project is in an APZ → *Continue to Question 3.*

Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

No, project is not within an APZ or RPZ/CZ

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. Is the project in conformance with DOD guidelines for APZ?

Yes, project is consistent with DOD guidelines without further action.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Click here to enter text.

→ *Work with the RE/HUD to develop mitigation measures. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Proposed Project is not located within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The closest airport is the Springfield Municipal Airport (D42), located approximately 30,000 feet from the Project Area.

For reference, see “National Plan of Integrated Airport Systems Map – 2021-2025.”



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Appendix B – Section 2

Coastal Barrier Resources (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/coastal-barrier-resources>

Projects located in the following states must complete this form.

Alabama	Georgia	Massachusetts	New Jersey	Puerto Rico	Virgin Islands
Connecticut	Louisiana	Michigan	New York	Rhode Island	Virginia
Delaware	Maine	Minnesota	North Carolina	South Carolina	Wisconsin
Florida	Maryland	Mississippi	Ohio	Texas	

1. Is the project located in a CBRS Unit?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a CBRS Unit.*

Yes → *Continue to 2.*

Federal assistance for most activities may not be used at this location. You must either choose an alternate site or cancel the project. In very rare cases, federal monies can be spent within CBRS units for certain exempted activities (e.g., a nature trail), after consultation with the Fish and Wildlife Service (FWS) (see [16 USC 3505](#) for exceptions to limitations on expenditures).

2. Indicate your recommended course of action for the RE/HUD

Consultation with the FWS

Cancel the project

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

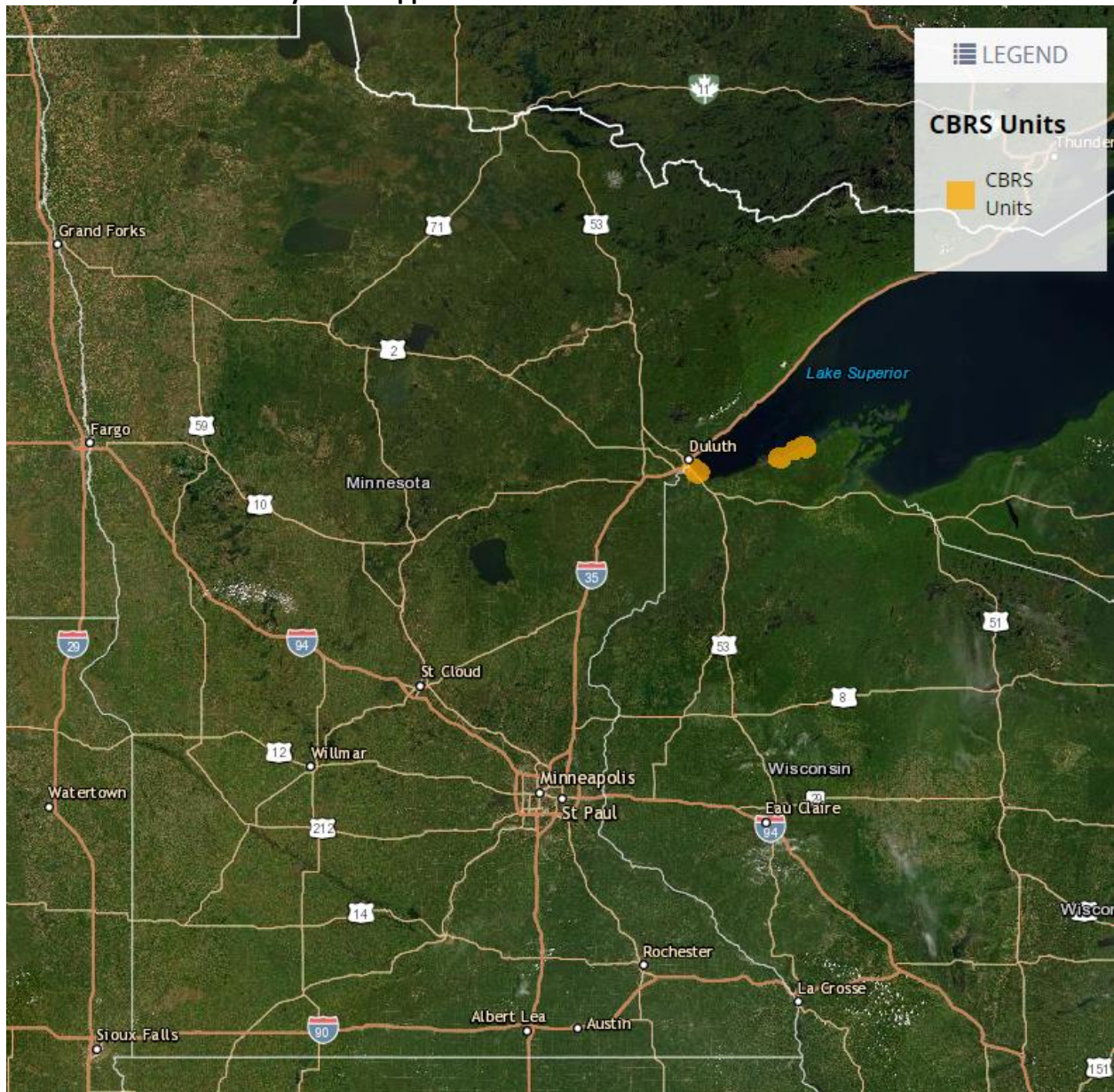
Include all documentation supporting your findings in your submission to HUD.



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According to the Coastal Barrier Resource System Mapper, there are no Coastal Barrier Resource System (CBRS) Units located within the vicinity of the Proposed Project. For reference, see “Coastal Barrier Resource System Mapper – Minnesota” below.

Coastal Barrier Resource System Mapper – Minnesota





Appendix B – Section 3

Flood Insurance (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/flood-insurance>

1. Does this project involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

→ *Continue to the Worksheet Summary.*

Yes → *Continue to Question 2.*

2. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs).

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

No → *Continue to the Worksheet Summary.*

Yes → *Continue to Question 3.*

3. Is the community participating in the National Flood Insurance Program *or* has less than one year passed since FEMA notification of Special Flood Hazards?

Yes, the community is participating in the National Flood Insurance Program.

Flood insurance is required. Provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance.

→ *Continue to the Worksheet Summary.*

Yes, less than one year has passed since FEMA notification of Special Flood Hazards.

If less than one year has passed since notification of Special Flood Hazards, no flood insurance is required.

→ *Continue to the Worksheet Summary.*

No. The community is not participating, or its participation has been suspended.

Federal assistance may not be used at this location. Cancel the project at this location.

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

No mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property is anticipated as part of the Proposed Project.



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Appendix B – Section 4

Air Quality (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/air-quality>

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes → Continue to Question 2.

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide any documents used to make your determination.

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

No, project's county or air quality management district is in attainment status for all criteria pollutants

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, project's management district or county is in non-attainment or maintenance status for one or more criteria pollutants. → Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Explain how you determined that the project would not exceed *de minimis* or threshold emissions.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ Continue to Question 4. Explain how you determined that the project would not exceed *de minimis* or threshold emissions in the Worksheet Summary.

- 4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

[Click here to enter text.](#)

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The installation of broadband lines would not involve new construction or conversion of existing land uses. Therefore, it can be assumed that emissions resulting from the Proposed Project would be below *de minimis* levels, and thus, the Proposed Project is in compliance with the Clean Air Act based on the guidance provided by HUD: <https://www.hudexchange.info/programs/environmental-review/air-quality/>.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
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Appendix B – Section 5

Coastal Zone Management Act (CEST and EA) – PARTNER

<https://www.onecpd.info/environmental-review/coastal-zone-management>

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samoa	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

- Yes → Continue to Question 2.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.

2. Does this project include activities that are subject to state review?

- Yes → Continue to Question 3.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.

3. Has this project been determined to be consistent with the State Coastal Management Program?

- Yes, with mitigation. → The RE/HUD must work with the State Coastal Management Program to develop mitigation measures to mitigate the impact or effect of the project.
- Yes, without mitigation. → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.
- No → Project cannot proceed at this location.

Worksheet Summary

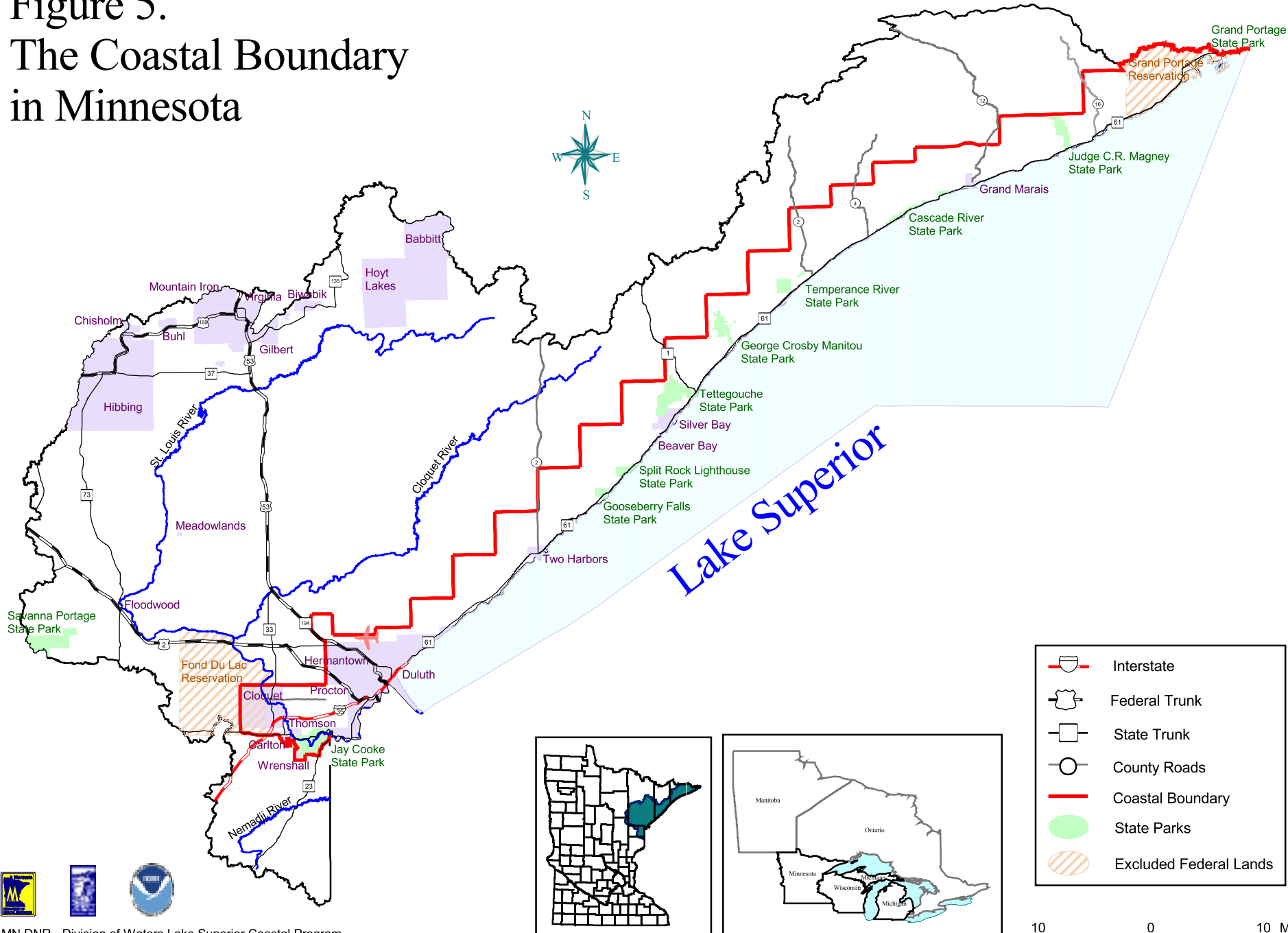
Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Project Area is not located within a Coastal Zone. The only Coastal Boundary within the State of Minnesota is located along the northern shore of Lake Superior. For reference, see “The Coastal Boundary in Minnesota” below.

Figure 5. The Coastal Boundary in Minnesota





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Appendix B – Section 6

Contamination and Toxic Substances (Single Family Properties) – PARTNER

<https://www.hudexchange.info/programs/environmental-review/site-contamination>

1. **Evaluate the site for contamination. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property?**

Provide a map or other documentation of absence or presence of contamination¹ and explain evaluation of site contamination in the Worksheet below.

No → **Explain below.**

[Click here to enter text.](#)

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 2.*

Check here if an ASTM Phase I Environmental Site Assessment (ESA) report was utilized.
[Note: HUD regulations does not require an ASTM Phase I ESA report for single family homes]

2. **Can adverse environmental impacts be mitigated?**

Adverse environmental impacts cannot feasibly be mitigated → HUD assistance may not be used for the project at this site. Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.
→ *Provide all mitigation requirements² and documents. Continue to Question 3.*

¹ Utilize EPA's Enviromapper and state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

² Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

3. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls³, or use of institutional controls⁴.

The specific broadband installation locations within the Project Area are to be determined. If it is determined that potentially contaminated sites are found near broadband installation locations, further investigation will take place at that time and all adverse environmental effects and impacts will be fully mitigated.

If a remediation plan or clean-up program was necessary, which standard does it follow?

- Complete removal
- Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The following graphics depict the locations of sites within the Project Area that are listed on the MN Pollution Control Agency's "What's in my Neighborhood" mapper. The specific broadband installation locations within the Project Area are to be determined. If it is determined that potentially contaminated sites are found near broadband installation locations, further investigation will take place at that time and all adverse environmental effects and impacts will be fully mitigated.

³ Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

⁴ Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

US EPA NEPAssist Mapper



Version 2020.05.002

[Home](#) | [Mobile](#) | [Help](#)

Find address or place

Basemap Imagery Draw Erase Save Session Tools More Data

Select Map Contents

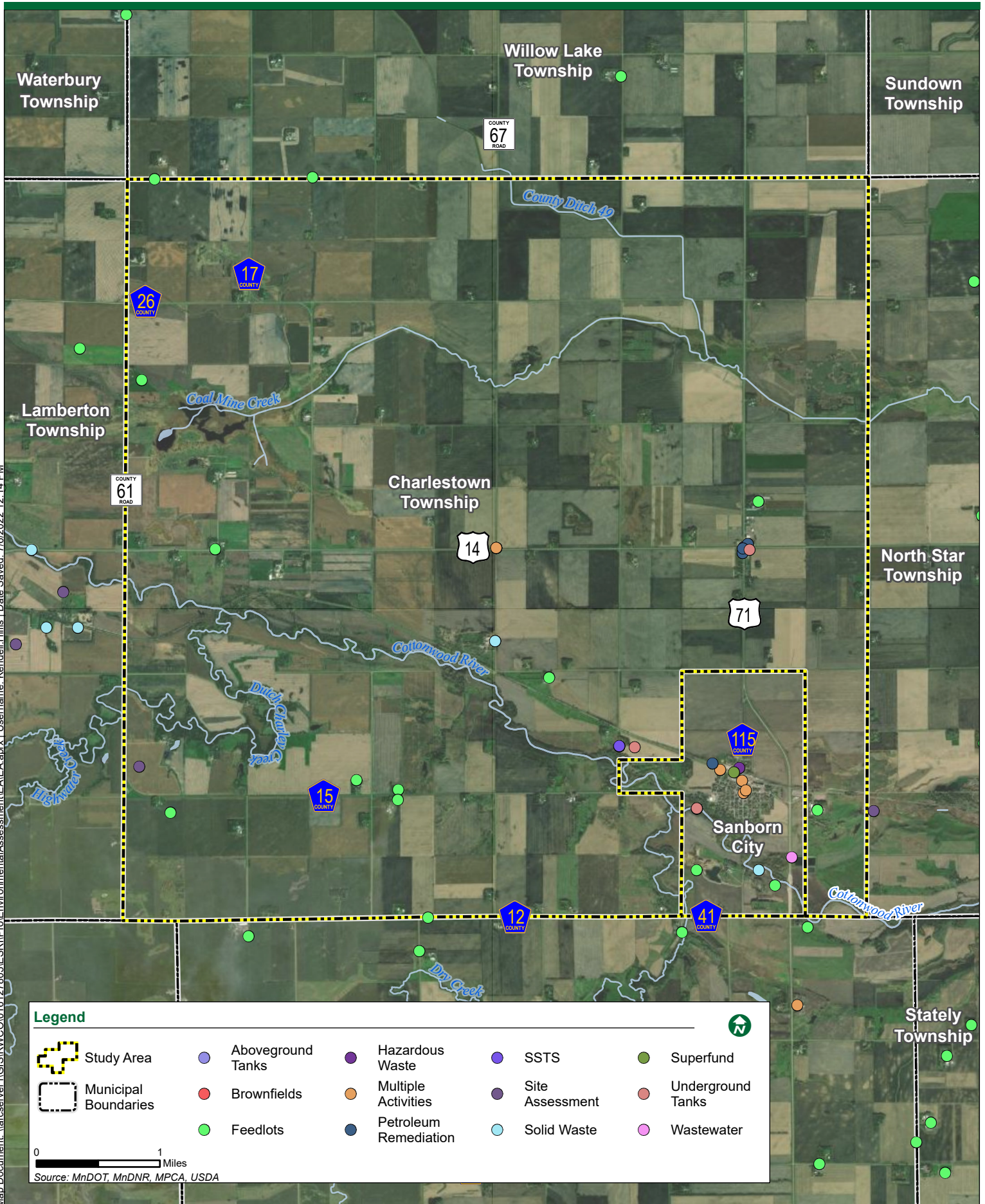
- EPA Facilities
 - Hazardous Waste (RCRAInfo)
 - Air Pollution (CIS-AIR)
 - Water Dischargers (NPDES)
 - Toxic Releases (TRI)
 - Superfund (NPL)
 - Brownfields (ACRES)
 - Toxic Substances Control Act (TSCA)
- Water Monitoring Stations
- Boundaries
- Non-attainment Areas
- EJScreen Indexes (2021)
- Water
- Transportation
- Places
- Critical Habitat
- NWI Wetlands
- FEMA Flood
- Land Cover

2 km 2 mi

44.267328, -95.145588

EnviroMapper®

Map data © OpenStreetMap contributors, Microsoft, Facebook, Inc. and its affiliates, Esri Community Maps contributors, Map layer by Esri | EPA OEI | U.S. EPA Office of Air and Radiation (OAR) - Office of Air Quality Pl... Powered by Esri



Map Document: \\arcserver1\GIS\RWCO\016127805\ESRI\Proj\EnvironmentalAssessment\EA\EA.aprx | Username: Kendall.Hillis | Date Saved: 7/6/2022 12:14 PM

Legend

Study Area	Aboveground Tanks	Hazardous Waste	SSTS	Superfund
Municipal Boundaries	Brownfields	Multiple Activities	Site Assessment	Underground Tanks
	Feedlots	Petroleum Remediation	Solid Waste	Wastewater

0 1 Miles
Source: MnDOT, MnDNR, MPCA, USDA



Appendix B – Section 7

Endangered Species Act (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/endangered-species>

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.

Explain your determination:

[Click here to enter text.](#)

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes, the activities involved in the project have the potential to affect species and/or habitats. →
Continue to Question 2.

2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#).

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.*

Yes, there are federally listed species or designated critical habitats present in the action area. →
Continue to Question 3.

3. Recommend one of the following effects that the project will have on federally listed species or designated critical habitat:

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ **Partner entities should not contact the Services directly.** *If the RE/HUD agrees with this recommendation, they will have to complete Informal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ **Partner entities should not contact the Services directly.** *If the RE/HUD agrees with this recommendation, they will have to complete Formal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

Construction activities associated with the Proposed Project may potentially affect may affect federally-listed species and critical habitats. For more information, refer to the USFWS IPaC Official Species List for the Project Area below.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
4101 American Blvd E
Bloomington, MN 55425-1665
Phone: (952) 252-0092 Fax: (952) 646-2873

In Reply Refer To:
Project Code: 2022-0063466
Project Name: Redwood County Broadband Development Project

July 14, 2022

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the ECOS IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Please refer to our [Section 7 website](#) for guidance and technical assistance, including [step-by-step instructions](#) for making effects determinations for each species that might be present and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of “There are no listed species found within the vicinity of the project,” then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **no effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) on our office website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **no effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

Northern Long-Eared Bats

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

This species hibernates in caves or mines only during the winter. In Minnesota and Wisconsin, the hibernation season is considered to be November 1 to March 31. During the active season (April 1 to October 31) they roost in forest and woodland habitats. Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected.

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
 - Trees found in highly developed urban areas (e.g., street trees, downtown areas),
-

- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A stand of eastern red cedar shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
- Any activity in or near the entrance to a cave or mine,
- Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
- Construction of one or more wind turbines, or
- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

If any of the above activities are proposed, please use the northern long-eared bat determination key in IPaC. This tool streamlines consultation under the 2016 rangewide programmatic biological opinion for the 4(d) rule. The key helps to determine if prohibited take might occur and, if not, will generate an automated verification letter. No further review by us is necessary.

Please note that on March 23, 2022, the Service published a proposal to reclassify the northern long-eared bat as endangered under the Endangered Species Act. The U.S. District Court for the District of Columbia has ordered the Service to complete a new final listing determination for the bat by November 2022 (Case 1:15-cv-00477, March 1, 2021). The bat, currently listed as threatened, faces extinction due to the range-wide impacts of white-nose syndrome (WNS), a deadly fungal disease affecting cave-dwelling bats across the continent. The proposed reclassification, if finalized, would remove the current 4(d) rule for the NLEB, as these rules may be applied only to threatened species. Depending on the type of effects a project has on NLEB, the change in the species' status may trigger the need to re-initiate consultation for any actions that are not completed and for which the Federal action agency retains discretion once the new listing determination becomes effective (anticipated to occur by December 30, 2022). If your project may result in incidental take of northern long-eared bats after the new listing goes into effect this will first need to be addressed in an updated consultation that includes an Incidental Take Statement. If your project may require re-initiation of consultation, please contact our office for additional guidance.

Whooping Crane

Whooping crane is designated as a non-essential experimental population in Wisconsin and consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. If project activities are proposed on lands outside of a National Wildlife Refuge or National Park, then you are not required to consult. For additional information on this designation and consultation requirements, please review "[Establishment of a Nonessential Experimental Population of](#)

[Whooping Cranes in the Eastern United States.”](#)

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. Should bald or golden eagles occur within or near the project area please contact our office for further coordination. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of [recommendations that minimize potential impacts to migratory birds](#). Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

State Department of Natural Resources Coordination

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.

Minnesota

[Minnesota Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: Review.NHIS@state.mn.us

Wisconsin

[Wisconsin Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: DNRRERReview@wi.gov

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Minnesota-Wisconsin Ecological Services Field Office

4101 American Blvd E

Bloomington, MN 55425-1665

(952) 252-0092

Project Summary

Project Code: 2022-0063466

Event Code: None

Project Name: Redwood County Broadband Development Project

Project Type: Utility Infrastructure Maintenance

Project Description: The Proposed Project would expand broadband services throughout the City of Sanborn and Charlestown Township, particularly within underserved or unserved areas. The Proposed Project seeks to address the need for improved broadband connectivity for City of Sanborn and Charlestown Township residents and businesses by improving and expanding the existing infrastructure and installing last mile components on properties within the Project Area. Underground broadband fiber lines would be installed by temporarily excavating within previously disturbed right of way, adjacent land next to roadways, and residential yards. Excavation activities will occur in previously disturbed ground and potentially some undisturbed ground and may include restoration and/or repair of disturbed ground, utility connections, and the like. The grant funding would provide these connections to residential properties. Any non-residential locations would be encouraged to be served by the internet service provider, and these locations—as well as any middle mile or distribution fiber used solely for these locations—would be fully funded by the internet service provider and would not utilize grant funding.

The Proposed Project will provide access for residents who do not have other resources available for broadband assistance. The Proposed Project would expand the existing infrastructure and facilities to reach more residents and would not duplicate the efforts of any other planned or completed project. The proposed average speed will be 1000 Mbps for download and upload

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@44.238542100000004,-95.16850312305083,14z>



Counties: Brown , Cottonwood , and Redwood counties, Minnesota

Endangered Species Act Species

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Flowering Plants

NAME	STATUS
Prairie Bush-clover <i>Lespedeza leptostachya</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4458	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Golden-plover <i>Pluvialis dominica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31

NAME	BREEDING SEASON
Black Tern <i>Chlidonias niger</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3093	Breeds May 15 to Aug 20
Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 20 to Jul 31
Franklin's Gull <i>Leucophaeus pipixcan</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Henslow's Sparrow <i>Ammodramus henslowii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds May 1 to Aug 31
Hudsonian Godwit <i>Limosa haemastica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Long-eared Owl <i>asio otus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3631	Breeds Mar 1 to Jul 15
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Ruddy Turnstone <i>Arenaria interpres morinella</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Short-billed Dowitcher <i>Limnodromus griseus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the

FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your

project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no

data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Wetlands

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

LAKE

- [Lacustrine](#)

RIVERINE

- [Riverine](#)

FRESHWATER EMERGENT WETLAND

- [Palustrine](#)
-

IPaC User Contact Information

Agency: County of Redwood
Name: Lucas Bulger
Address: 111 Washington Avenue South
Address Line 2: Suite 650
City: Minneapolis
State: MN
Zip: 55401
Email: lucas.bulger@bolton-menk.com
Phone: 6122700928

Lead Agency Contact Information

Lead Agency: Department of Housing and Urban Development



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

Appendix B – Section 8

Explosive and Flammable Hazards (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities>

1. Does the proposed HUD-assisted project include a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

→ Continue to Question 2.

Yes

Explain:

[Click here to enter text.](#)

→ Continue to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes → Continue to Question 3.

3. Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers:

- Of more than 100-gallon capacity, containing common liquid industrial fuels OR
- Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels?

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.

Yes → Continue to Question 4.

4. Is the Separation Distance from the project acceptable based on standards in the Regulation?

Please visit HUD's website for information on calculating Acceptable Separation Distance.

Yes

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the “assessed tank.”

No

→ Continue to Question 6.

Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the “assessed tank.”

5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

Yes

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

No

→ Continue to Question 6.

Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to make the Separation Distance acceptable, including the timeline for implementation. If negative effects cannot be mitigated, cancel the project at this location.

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

[Click here to enter text.](#)

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Proposed Project would not involve a Hazardous Facility or include any development, construction, rehabilitation, or conversion that would increase or affect residential densities.



Appendix B – Section 9

Farmlands Protection (CEST and EA) - PARTNER

<https://www.hudexchange.info/environmental-review/farmlands-protection>

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes → *Continue to Question 2.*

No

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist http://soils.usda.gov/contact/state_offices/ for assistance

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes → *Continue to Question 3.*

3. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form [AD-1006, “Farmland Conversion Impact Rating”](#) and contact the state soil scientist before sending it to the local NRCS District Conservationist.
- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

Work with the RE/HUD to determine how the project will proceed. Document the conclusion:

Project will proceed with mitigation.

Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Click here to enter text.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Project will proceed without mitigation.

Explain why mitigation will not be made here:

Click here to enter text.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Proposed Project would not require any activities, including new construction, acquisition, or conversion of undeveloped land, that would convert agricultural land to a non-agricultural use. Underground broadband fiber lines would be installed by temporarily excavating areas within previously disturbed right of way, adjacent land next to roadways, and residential yards.



Appendix B – Section 10

Floodplain Management (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/floodplain-management>

1. Does [24 CFR 55.12\(c\)](#) exempt this project from compliance with HUD’s floodplain management regulations in Part 55?

Yes

Provide the applicable citation at 24 CFR 55.12(c) here. If project is exempt under 55.12(c)(6) or (8), provide supporting documentation.

Click here to enter text.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary.

No → Continue to Question 2.

2. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs).

Does your project occur in a floodplain?

No → Continue to the Worksheet Summary below.

Yes

Select the applicable floodplain using the FEMA map or the best available information:

Floodway → Continue to Question 3, Floodways

Coastal High Hazard Area (V Zone) → Continue to Question 4, Coastal High Hazard Areas

500-year floodplain (B Zone or shaded X Zone) → Continue to Question 5, 500-year Floodplains

100-year floodplain (A Zone) → The 8-Step Process is required. Continue to Question 6, 8-Step Process

3. **Floodways**

Is this a functionally dependent use?

Yes

The 8-Step Process is required. Work with HUD or the RE to assist with the 8-Step Process.

→ Continue to Worksheet Summary.

- No → *Federal assistance may not be used at this location unless an exception in 55.12(c) applies. You must either choose an alternate site or cancel the project.*

4. Coastal High Hazard Area

Is this a critical action such as a hospital, nursing home, fire station, or police station?

- Yes → *Critical actions are prohibited in coastal high hazard areas unless an exception in 55.12(c) applies. You must either choose an alternate site or cancel the project.*

- No

Does this action include new construction that is not a functionally dependent use, existing construction (including improvements), or reconstruction following destruction caused by a disaster?

- Yes, there is new construction of something that is not a functionally dependent use. New construction must be designed to FEMA standards for V Zones at 44 CFR 60.3(e) (24 CFR 55.1(c)(3)(i)).
→ Continue to Question 6, 8-Step Process
- No, this action concerns only existing construction. Existing construction must have met FEMA elevation and construction standards for a coastal high hazard area or other standards applicable at the time of construction.
→ Continue to Question 6, 8-Step Process

5. 500-year Floodplain

Is this a critical action?

- No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary below.*

- Yes → Continue to Question 6, 8-Step Process

6. 8-Step Process.

Is this 8-Step Process required? Select one of the following options:

- 8-Step Process applies.
This project will require mitigation and may require elevating structure or structures. See the link to the HUD Exchange above for information on HUD's elevation requirements.
→ Work with the RE/HUD to assist with the 8-Step Process. Continue to Worksheet Summary.
- 5-Step Process is applicable per 55.12(a)(1-3).
Provide the applicable citation at 24 CFR 55.12(a) here.
[Click here to enter text.](#)
→ Work with the RE/HUD to assist with the 5-Step Process. Continue to Worksheet Summary.
- 8-Step Process is inapplicable per 55.12(b)(1-4).
Provide the applicable citation at 24 CFR 55.12(b) here.
[Click here to enter text.](#)

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

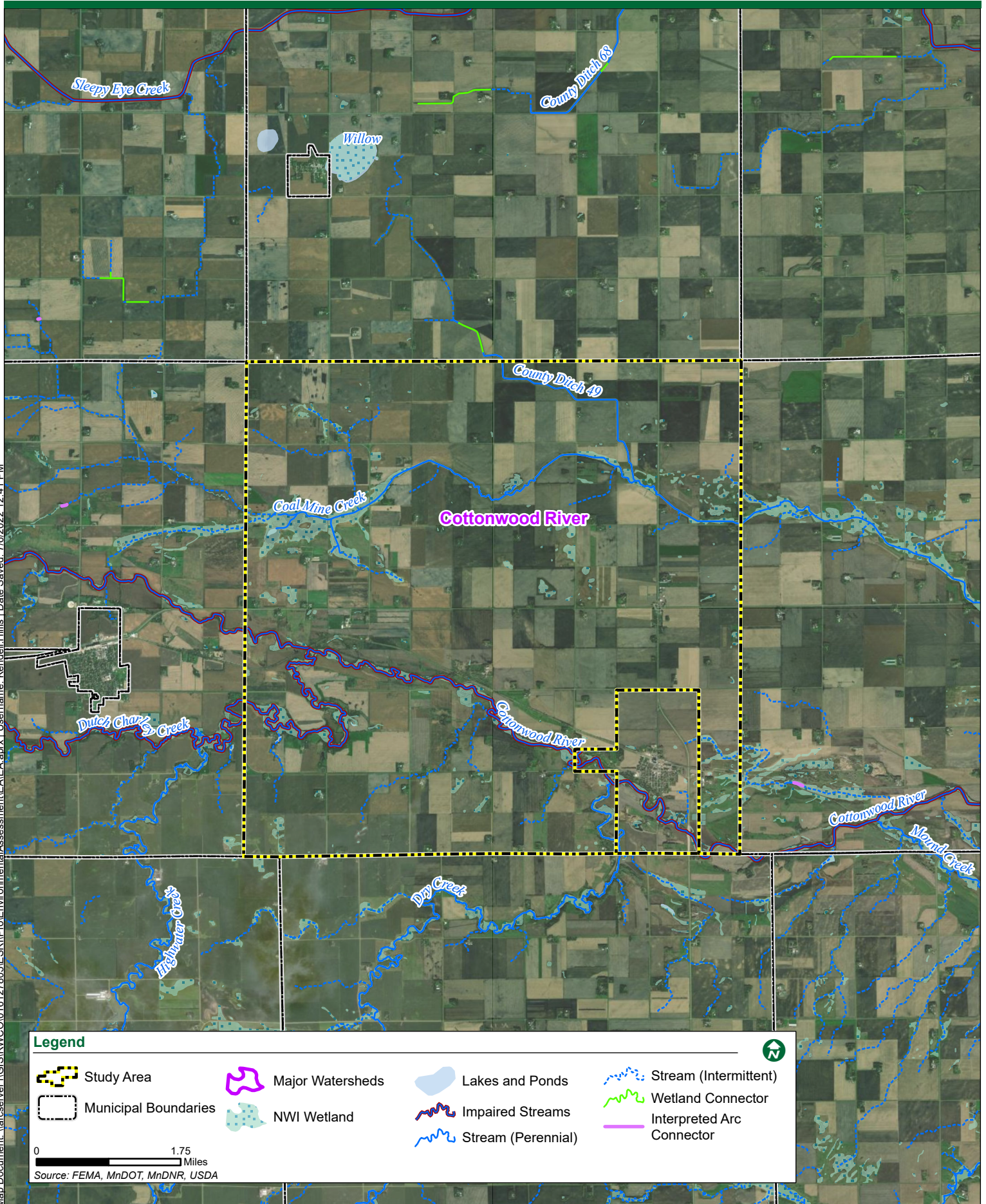
Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The project area includes FEMA FIRM Panels #27127C0660C and #27127C0680C. As shown in Figure 5, "Surface Waters & Flood Zones," 100-year floodplains are located within the project area, however it is unknown at this time whether specific project activities will occur within a floodplain. Based on the general locations where broadband lines are anticipated to be installed, including existing rights of way and residential yards, it is unlikely that project activities will occur in a floodplain. Floodplains will be reevaluated for potential impacts and mitigation measures will be established as necessary once the broadband installation locations are finalized.



Map Document: \\arcserver1\GIS\RWCO\016127805\ESRI\Proj\EnvironmentalAssessment\EA\EA.aprx | User name: Kendall Hillis | Date Saved: 7/6/2022 12:41 PM

Legend

Study Area	Major Watersheds	Lakes and Ponds	Stream (Intermittent)
Municipal Boundaries	NWI Wetland	Impaired Streams	Wetland Connector
		Stream (Perennial)	Interpreted Arc Connector

0 1.75 Miles
Source: FEMA, MnDOT, MnDNR, USDA



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Appendix B – Section 11

Historic Preservation (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/historic-preservation>

Threshold

Is Section 106 review required for your project?

- No, because a Programmatic Agreement states that all activities included in this project are exempt. (See the [PA Database](#) to find applicable PAs.)

Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:

Click here to enter text.

→ *Continue to the Worksheet Summary.*

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Either provide the memo itself or a link to it here. Explain and justify the other determination here:

Click here to enter text.

→ *Continue to the Worksheet Summary.*

- Yes, because the project includes activities with potential to cause effects (direct or indirect). → *Continue to Step 1.*

The Section 106 Process

After determining the need to do a Section 106 review, HUD or the RE will initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

Only RE or HUD staff may initiate the Section 106 consultation process. Partner entities may gather information, including from SHPO records, identify and evaluate historic properties, and make initial assessments of effects of the project on properties listed in or eligible for the National Register of Historic Place. Partners should then provide their RE or HUD with all of their analysis and documentation so that they may initiate consultation.

Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within [Notice CPD-12-006: Process for Tribal Consultation](#) to determine if the RE or HUD should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that only HUD or the RE may initiate consultation with Tribes. Partner entities may prepare a draft letter for the RE or HUD to use to initiate consultation with tribes, but may not send the letter themselves.

List all organizations and individuals that you believe may have an interest in the project here:

The following organizations were identified by the HUD Tribal Directory Assessment Tool (TDAT) as potentially having an interest in projects located in Redwood County, Minnesota:

Apache Tribe of Oklahoma
Cheyenne and Arapaho Tribes, Oklahoma
Flandreau Santee Sioux Tribe of South Dakota
Fort Belknap Indian Community of the Ford Belknap Reservation of Montana
Iowa Tribe of Kansas and Nebraska
Lower Sioux Indian Community in the State of Minnesota
Menominee Indian Tribe of Wisconsin
Prairie Island Indian Community in the State of Minnesota
Santee Sioux Nation, Nebraska
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota
Spirit Lake Tribe, North Dakota
Upper Sioux Community, Minnesota

→ *Continue to Step 2.*

Step 2 - Identify and Evaluate Historic Properties

Provide a preliminary definition of the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE. Attach an additional page if necessary.

The Study Area for the proposed project is depicted in Appendix A, Figure 3, "Aerial Photo."

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the

National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register. Refer to HUD's website for guidance on identifying and evaluating historic properties.

In the space below, list historic properties identified and evaluated in the APE.

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

See the attached table, "Sites in Redwood County Listed on the National Register of Historic Places Database," for a list of sites on the National Register of Historic Places located within Redwood County, Minnesota.

Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.

Was a survey of historic buildings and/or archeological sites done as part of the project?

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#).

Yes → Provide survey(s) and report(s) and continue to Step 3.

Additional notes:

[Click here to enter text.](#)

No → Continue to Step 3.

Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

Choose one of the findings below to recommend to the RE or HUD.

Please note: this is a recommendation only. It is **not the official finding, which will be made by the RE or HUD, but only your suggestion as a Partner entity.**

No Historic Properties Affected

Document reason for finding:

No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Document reason for finding and provide any comments below.

Comments may include recommendations for mitigation, monitoring, a plan for unanticipated discoveries, etc.

As discussed in Step 2, “Identify and Evaluate Historic Properties,” NRHP-listed properties are located within the Study Area. Once the specific locations of broadband installation are determined, installation locations will be reviewed with historic site locations, previously-recorded archaeological sites, previously-inventoried properties, and unrecorded cemeteries to determine the potential for any impacts or effects to historic properties. Mitigation measures will be established at that time, if necessary.

Adverse Effect

Document reason for finding:

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)

[Click here to enter text.](#)

Provide any comments below:

Comments may include recommendations for avoidance, minimization, and/or mitigation.

Potential impacts to historic properties will be assessed and mitigation measures will be established as necessary once the broadband installation locations are finalized.

Remember to provide all documentation that justifies your National Register Status determination and recommendations along with this worksheet.

Sites in Redwood County listed on the National Register of Historic Places Database

Reference #	Property Name	Status	Request Type	Category	County	City	Street & Number
80002128	Gimmestad Land and Loan Office	Listed	Multiple	BUILDING	Redwood	Belview	Main St.
80002129	Minneapolis and St. Louis Railroad Depot	Listed	Multiple	BUILDING	Redwood	Belview	Off Main St.
74001041	Odeon Theater	Listed	Single	BUILDING	Redwood	Belview	Main St.
80002130	Clements State Bank Building	Listed	Multiple	BUILDING	Redwood	Clements	1st and Pine Sts.
80002131	District No. 8 School	Listed	Multiple	BUILDING	Redwood	Clements	CR 70
80002132	Anderson, J. A., House	Listed	Multiple	BUILDING	Redwood	Lamberton	402 4th Ave.
80002133	City Blacksmith Shop	Listed	Multiple	BUILDING	Redwood	Lamberton	Douglas St. and 2nd Ave.
80002135	Chicago and North Western Railroad Depot	Listed	Multiple	BUILDING	Redwood	Lucan	1st St.
80002137	Milroy State Bank Building	Listed	Multiple	BUILDING	Redwood	Milroy	Superior St. and Euclid Ave.
90000554	Birch Coulee School	Listed	Single	BUILDING	Redwood	Morton	Off Co. Hwy. 2, S of Morton
70000308	Lower Sioux Agency	Listed	Single	BUILDING	Redwood	Morton	Address Restricted
79003717	St. Cornelia's Episcopal Church	Listed	Single	BUILDING	Redwood	Morton	Off Co. Hwy. 2
80002138	Honner-Hosken House	Listed	Multiple	BUILDING	Redwood	North Redwood	North and Main Sts.
80002141	Bank of Redwood Falls Building	Listed	Multiple	BUILDING	Redwood	Redwood Falls	2nd St.
80002142	Chollar, H. D., House	Listed	Multiple	BUILDING	Redwood	Redwood Falls	4th and Minnesota Sts.
80002143	Gilfillan	Listed	Multiple	DISTRICT	Redwood	Redwood Falls	MN 67
80002144	Ramsey Park Swayback Bridge	Listed	Multiple	STRUCTURE	Redwood	Redwood Falls	Ramsey Park
80002139	Redwood Falls Carnegie Library	Listed	Multiple	BUILDING	Redwood	Redwood Falls	334 S. Jefferson St.
12000429	Redwood Falls Retaining Wall Roadside Development Project	Listed	Multiple	SITE	Redwood	Redwood Falls	Jct. of MN 19 & 71
80002140	Scenic City Cooperative Oil Company	Listed	Multiple	BUILDING	Redwood	Redwood Falls	2nd and Mill Sts.
80002145	Revere Fire Hall	Listed	Multiple	BUILDING	Redwood	Revere	2nd St.
06000602	Walnut Grove Creamery Association	Listed	Single	BUILDING	Redwood	Walnut Grove	521 Main St.

Contact Information for Tribes with Interests in Redwood County, Minnesota

Results from Query

Tribal Name	Contact Name	Title	Mailing Address	Work Phone	Fax Number	Email Address	URL
Apache Tribe of Oklahoma	Bobby Komardley	Chairman	PO Box 1330 Anadarko, OK 73005	(405) 247-9493	(405) 247-2763	bkomardley@outlook.com	http://www.apachetribe.org/
Cheyenne and Arapaho Tribes, Oklahoma	Max Bear	THPO	700 Black Kettle Blvd Concho, OK 73022	(405) 422-7416	(405) 422-7715	mbear@c-a-tribes.org	www.c-a-tribes.org
Cheyenne and Arapaho Tribes, Oklahoma	Reggie Wassana	Governor	P.O. Box 167 Concho, OK 73022	(405) 422-7430	(405) 422-8237	ehamilton@c-a-tribes.org	www.c-a-tribes.org
Flandreau Santee Sioux Tribe of South Dakota	Garrie Kills A Hundred	THPO	PO Box 283 Flandreau, SD 57028	(605) 864-1236	(605) 997-3878	garrie.killsahundred@FSST.org	www.santeesioux.com
Flandreau Santee Sioux Tribe of South Dakota	Anthony Reider	Chairperson	PO Box 283 Flandreau, SD 57028-0283	(605) 997-3891	(605) 997-3878	president@fsst.org	www.santeesioux.com
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	Michael Blackwolf	THPO	656 Agency Main Street Harlem, MT 59526-9455	(406) 353-8471	(406) 353-2889	mblackwolf@ftbelknap.org	http://www.ftbelknap.org/
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	Andrew Werk	President	656 Agency Main Street Harlem, MT 59526-9455	(406) 353-2205	(406) 353-4541	andy.werk@ftbelknap.org	http://www.ftbelknap.org/
Iowa Tribe of Kansas and Nebraska	Tim Rhodd	Chairperson	3345 B Thrasher Rd. White Cloud, KS 66094	(785) 595-3258	(785) 595-6610	Trhodd@iowas.org	http://iowatribeofkansandnebraska.com/
Iowa Tribe of Kansas and Nebraska	Lance Foster	THPO	3345 B Thrasher Rd. White Cloud, KS 66094	(785) 595-3258	(785) 595-6610	lfoster@iowas.org	http://iowatribeofkansandnebraska.com/
Lower Sioux Indian Community in the State of Minnesota	Robert Larsen	President	PO Box 308 Morton, MN 56270	(507) 697-6185	(507) 697-8617	robert.larsen@lowersioux.com	www.lowersioux.com
Lower Sioux Indian Community in the State of Minnesota	Cheyenne St. John	THPO	PO Box 308 Morton, MN 56270	(507) 697-6321	(507) 697-6310	cheyanne.stjohn@lowersioux.com	www.lowersioux.com
Menominee Indian Tribe of Wisconsin	Joan Delabreau	Chairwoman	PO Box 910 Keshena, WI 54135	(715) 799-5100	(715) 799-3373	chairman@mitw.org	http://www.menominee-nsn.gov/
Menominee Indian Tribe of Wisconsin	David Grignon	THPO	PO Box 910 Keshena, WI 54135-0910	(715) 799-5258	(715) 799-5295	dgrignon@mitw.org	http://www.menominee-nsn.gov/
Prairie Island Indian Community in the State of Minnesota	Shelley Buck	President	5636 Sturgeon Lake Road Welch, MN 55089	(651) 385-4124	(651) 385-4180	Sbartell@piic.org	http://prairieisland.org/
Prairie Island Indian Community in the State of Minnesota	Noah White	THPO	5636 Sturgeon Lake Road Welch, MN 55089	(651) 385-4175	(651) 385-4180	noah.white@piic.org	http://prairieisland.org/
Santee Sioux Nation, Nebraska	Roger Trudell	Chairperson	108 Spirit Lake Ave. W Niobrara, NE 68760.0	(402) 857-2772	(402)857-2779	rtrudell@santeedakota.org	http://santeesiouxnation.net/index.html
Santee Sioux Nation, Nebraska	Misty Frazier	THPO	425 Frazier Ave. N. Suite 2 Niobrara, NE 68760.0	(402) 857-3568	(402) 857-2779	ssn.thpo@gmail.com	http://santeesiouxnation.net/index.html
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota	Verlyn Beaudreau	Interim Chairperson	PO Box 509 Agency Village, SD 57262-0509	(605) 698-3911	(605) 742-0265	chairman@swo-nsn.gov	http://www.swo-nsn.gov
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota	Dianne Desrosiers	THPO	P.O. Box 907 Sisseton, SD 57262-0509	(605) 698-3584	(605) 698-4283	dianned@swo-nsn.gov	http://www.swo-nsn.gov
Spirit Lake Tribe, North Dakota	Erich Longie	THPO	P.O. Box 76 Fort Totten, ND 58335-0359	(701) 351-2288	(701) 766-4126	thpo@gondtc.com	www.spiritlakenation.com
Spirit Lake Tribe, North Dakota	Myra Pearson	Chairwoman	PO Box 359 Fort Totten, ND 58335-0359	(701) 766-4221	(701) 766-4739	sit-adminsec@spiritlakenation.com	www.spiritlakenation.com
Upper Sioux Community, Minnesota	Samantha Odegard	THPO	PO Box 147 Granite Falls, MN 56241-0147	(320) 564-6334	(320) 564-4482	samanthao@uppersiouxcommunity-nsn.gov	http://www.uppersiouxcommunity-nsn.gov
Upper Sioux Community, Minnesota	Kevin Jensvold	Chairperson	PO Box 147 Granite Falls, MN 56241	(320) 564-3853	(320) 564-4482	kevinj@uppersiouxcommunity-nsn.gov	http://www.uppersiouxcommunity-nsn.gov



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
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Appendix B – Section 12

Noise (EA Level Reviews) – PARTNER

<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control>

1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.
→ *Continue to Question 2.*

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.
→ *Continue to Question 2.*

- None of the above

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

- There are no noise generators found within the threshold distances above.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.*

- Noise generators were found within the threshold distances.

→ *Continue to Question 3.*

3. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

- Acceptable (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: [Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.

- Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

Indicate noise level here: [Click here to enter text.](#)

If project is rehabilitation:

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.

If project is new construction:

Is the project in a largely undeveloped area¹?

No

Yes → **The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i).**

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.

- Unacceptable: (Above 75 decibels)

Indicate noise level here: [Click here to enter text.](#)

If project is rehabilitation:

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.

If project is new construction:

The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Work with HUD or the RE to either complete an EIS or obtain a waiver signed by the appropriate authority.

→ Continue to Question 4.

- 4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Work with the RE/HUD on the development of the mitigation measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

- Mitigation as follows will be implemented:

[Click here to enter text.](#)

→ Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.

¹ A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses and does not have water and sewer capacity to serve the project.

Continue to the Worksheet Summary.

No mitigation is necessary.

Explain why mitigation will not be made here:

[Click here to enter text.](#)

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Proposed Project would not involve new construction for residential use or the rehabilitation of an existing residential property. The purpose of the Proposed Project is to expand and improve internet access lines within the City of Sanborn and Charlestown Township.



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Appendix B – Section 13

Sole Source Aquifers (CEST and EA) - PARTNER

<https://www.hudexchange.info/environmental-review/sole-source-aquifers>

1. Is the project located on a sole source aquifer (SSA)¹?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map of your project or jurisdiction in relation to the nearest SSA.*

Yes → *Continue to Question 2.*

2. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes → *The review is in compliance with this section. Continue to the Worksheet Summary below.*

No → *Continue to Question 3.*

3. Does your region have a memorandum of understanding (MOU) or other working agreement with EPA for HUD projects impacting a sole source aquifer?

Contact your Field or Regional Environmental Officer or visit the HUD webpage at the link above to determine if an MOU or agreement exists in your area.

Yes → *Continue to Question 4.*

No → *Continue to Question 5.*

4. Does your MOU or working agreement exclude your project from further review?

Yes → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination and document where your project fits within the MOU or agreement.*

No → *Continue to Question 5.*

5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, storm water and waste water at the proposed project. Follow

¹ A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

- No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide your correspondence with the EPA and all documents used to make your determination.*
- Yes → *The RE/HUD will work with EPA to develop mitigation measures. If mitigation measures are approved, attach correspondence with EPA and include the mitigation measures in your environmental review documents and project contracts. If EPA determines that the project continues to pose a significant risk to the aquifer, federal financial assistance must be denied. Continue to Question 6.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Project Area is not located on a sole source aquifer. According to the EPA's Sole Source Aquifer Mapper, the closest sole source aquifer is the Mille Lacs Sole Source Aquifer, located approximately 150 miles northeast of the Proposed Project. For reference, see "EPA Sole Source Aquifer Mapper – Minnesota" below.

EPA Sole Source Aquifer Mapper – Minnesota

Sole Source Aquifers

Search bar: Slayton, MN, USA

Search results popup: Slayton, MN, USA

Legend: Sole_Source_Aquifers

Map labels: Grand Forks, Fargo, Watertown, Sioux Falls, Sioux City, Willmar, St. Cloud, Minneapolis, St. Paul, Rochester, Mason City, Waterloo, Duluth, Dryden, Anona.

Highways: 71, 53, 26, 12, 18, 35, 94, 81.

Scale: 60mi

Coordinates: -93.184 49.150 Degrees



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Appendix B – Section 14

Wetlands (CEST and EA) – Partner

<https://www.hudexchange.info/environmental-review/wetlands-protection>

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?

The term "new construction" includes draining, dredging, channelizing, filling, diking, impounding, and related activities and construction of any structures or facilities.

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact a wetland as defined in E.O. 11990?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

Yes → *Work with HUD or the RE to assist with the 8-Step Process.* *Continue to Question 3.*

3. Does Section 55.12 state that the 8-Step Process is not required?

No, the 8-Step Process applies.

This project will require mitigation and may require elevating structure or structures. See the link to the HUD Exchange above for information on HUD's elevation requirements.

→ *Work with the RE/HUD to assist with the 8-Step Process. Continue to Worksheet Summary.*

5-Step Process is applicable per 55.12(a).

Provide the applicable citation at 24 CFR 55.12(a) here.

[Click here to enter text.](#)

→ *Work with the RE/HUD to assist with the 5-Step Process. This project may require mitigation or alternations. Continue to Worksheet Summary.*

8-Step Process is inapplicable per 55.12(b).

Provide the applicable citation at 24 CFR 55.12(b) here.

[Click here to enter text.](#)

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.*

8-Step Process is inapplicable per 55.12(c).

Provide the applicable citation at 24 CFR 55.12(c) here.

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.

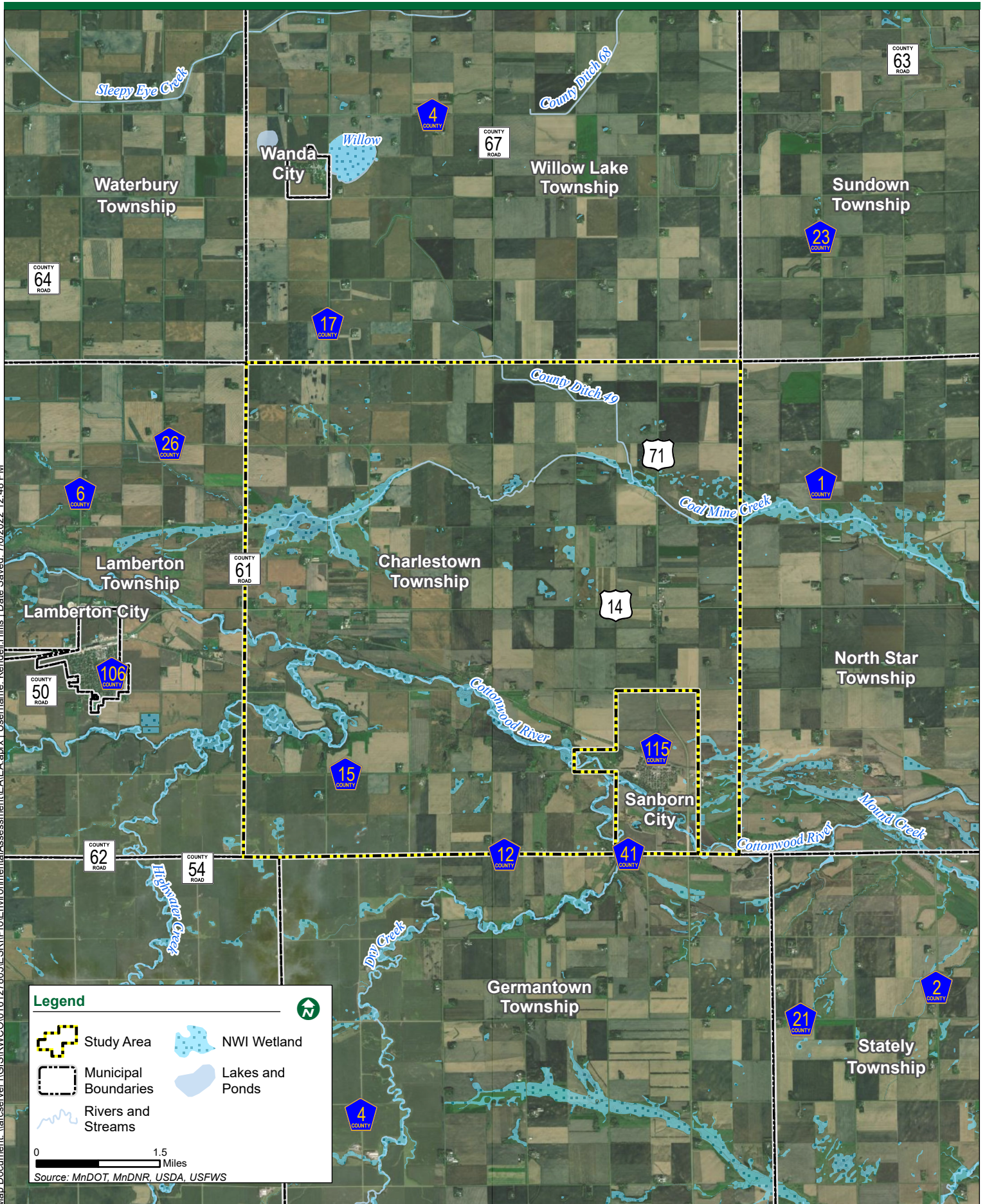
Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Proposed Project would require ground disturbance during the installation of broadband lines. As shown on Figure 6, "Wetlands," NWI Wetlands are located within portions of the project area. However, it is unknown at this time whether specific project activities will occur within the vicinity of an identified wetland. Based on the general locations where broadband lines are anticipated to be installed, including existing rights of way and residential yards, it is unlikely that project activities will intersect with wetlands. Potential impacts to wetlands will be assessed and associated mitigation measures will be established as necessary once the broadband installation locations are finalized.





Appendix B – Section 15

Wild and Scenic Rivers (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers>

1. Is your project within proximity of a Wild and Scenic River, Study River, or Nationwide Rivers Inventory River?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation used to make your determination.*

Yes → *Continue to Question 2.*

2. Could the project do *any* of the following?

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consult with the appropriate federal/state/local/tribal Managing Agency(s), pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Select one:

The Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

The Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *The RE/HUD must work with the Managing Agency to identify mitigation measures to mitigate the impact or effect of the project on the river.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates

- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The St. Croix River is the only designated Wild and Scenic River in Minnesota. The St. Croix River is located in eastern Minnesota and not within the vicinity of the Proposed Project.

There are no Nationwide Rivers Inventory or NWSRS Study Rivers located within the vicinity of the Proposed Project.

National Wild and Scenic Rivers System – Minnesota



NATIONAL SYSTEM MANAGEMENT RESOURCES PUBLICATIONS CONTACT US 50

MINNESOTA

Minnesota has approximately 91,944 miles of river, of which 226 miles are designated as wild & scenic—approximately 2/10ths of 1% of the state's river miles.



[+ View larger map](#)

St. Croix River

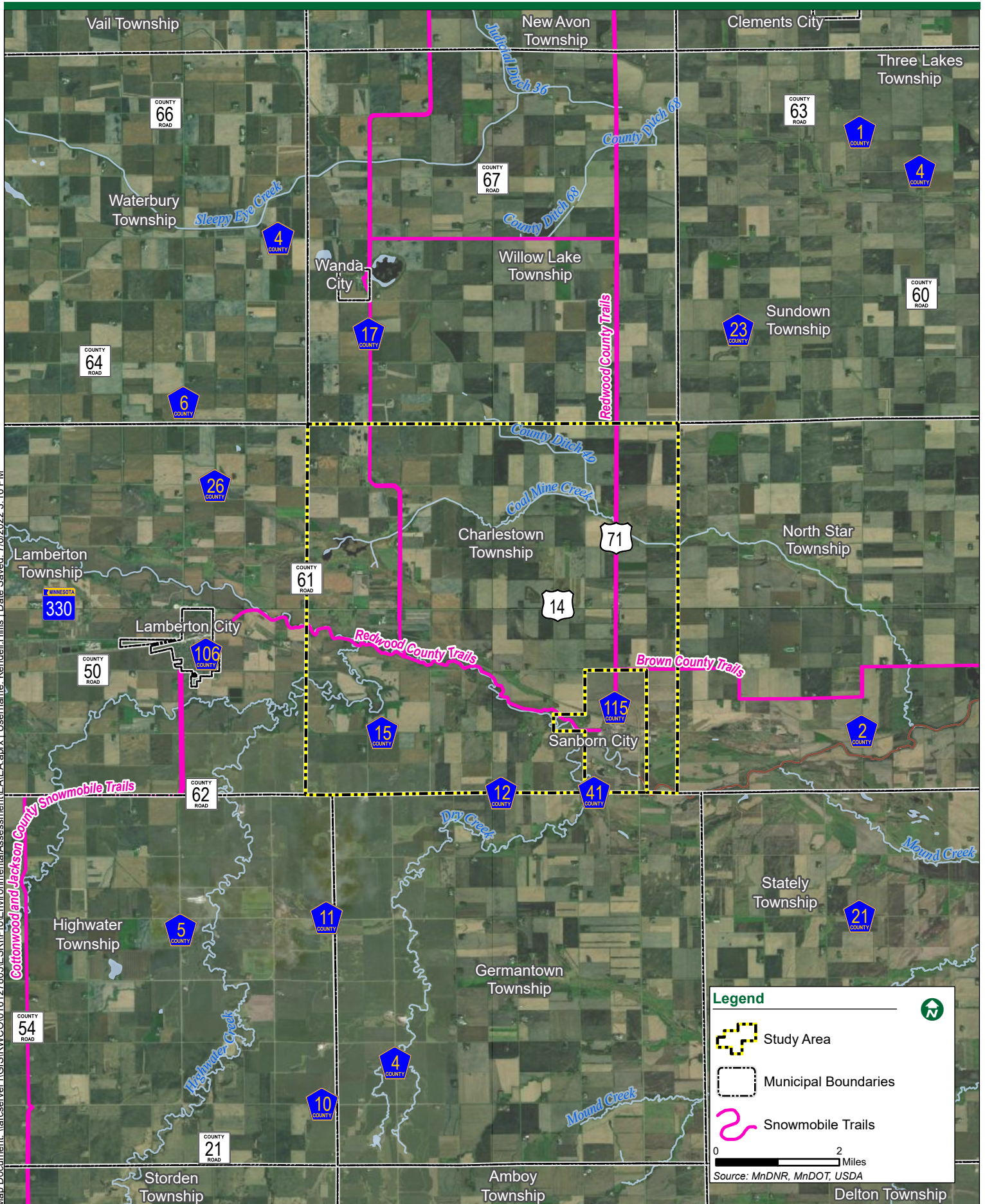
Nationwide Rivers Inventory

Nationwide Rivers Inventory

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkable" values.

National Park Service
U.S. Department of the Interior





Map Document: \\arcserver1\GIS\SR\WCO\016127805\ESRI\Proj\EnvironmentalAssessment\EA\EA.aprx | User name: Kendall.Hillis | Date Saved: 7/16/2022 3:16 PM



Appendix B – Section 16

Environmental Justice (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/environmental-justice>

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes → *Continue to Question 2.*

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

Explain:

Click here to enter text.

→ *The RE/HUD must work with the affected low-income or minority community to decide what mitigation actions, if any, will be taken. Provide any supporting documentation.*

No

Explain:

Click here to enter text.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

No adverse environmental impacts were identified in any other compliance review portion of this project's total environmental review. The Proposed Project would not generate any disproportionate adverse impacts on minority or low-income populations. The installation of adequate and affordable broadband internet service would result in a net benefit to minority and low-income populations within the Project Area. Ground disturbance and any other environmental effects that occur during the construction phase of the Proposed Project would be temporary in nature, and all disturbed areas would be restored to their original condition upon completion of the Proposed Project. No adverse environmental impacts are anticipated during the operation of the Proposed Project.

EJScreen Report (Version 2.0)

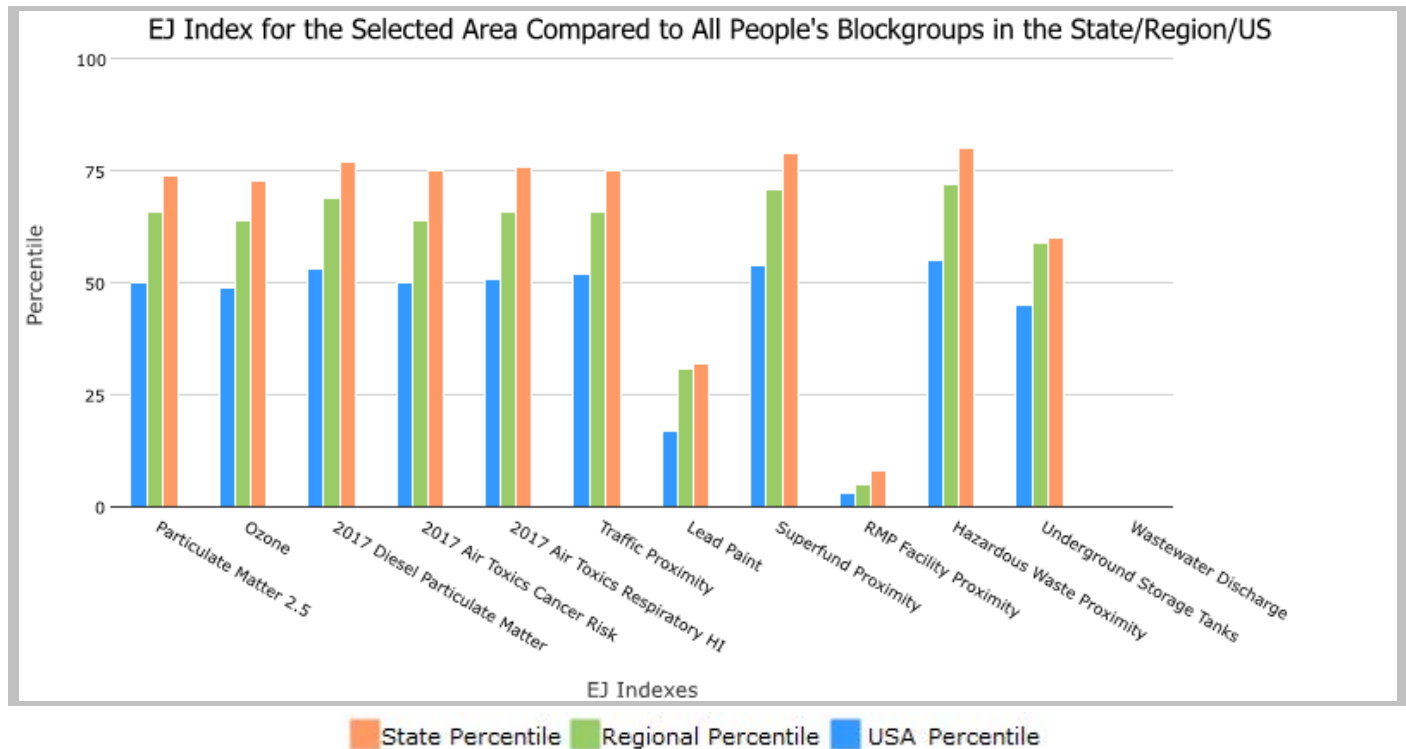
the User Specified Area, MINNESOTA, EPA Region 5

Approximate Population: 556

Input Area (sq. miles): 36.00

Redwood County Broadband Development Project

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	74	66	50
EJ Index for Ozone	73	64	49
EJ Index for 2017 Diesel Particulate Matter*	77	69	53
EJ Index for 2017 Air Toxics Cancer Risk*	75	64	50
EJ Index for 2017 Air Toxics Respiratory HI*	76	66	51
EJ Index for Traffic Proximity	75	66	52
EJ Index for Lead Paint	32	31	17
EJ Index for Superfund Proximity	79	71	54
EJ Index for RMP Facility Proximity	8	5	3
EJ Index for Hazardous Waste Proximity	80	72	55
EJ Index for Underground Storage Tanks	60	59	45
EJ Index for Wastewater Discharge	N/A	N/A	N/A



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

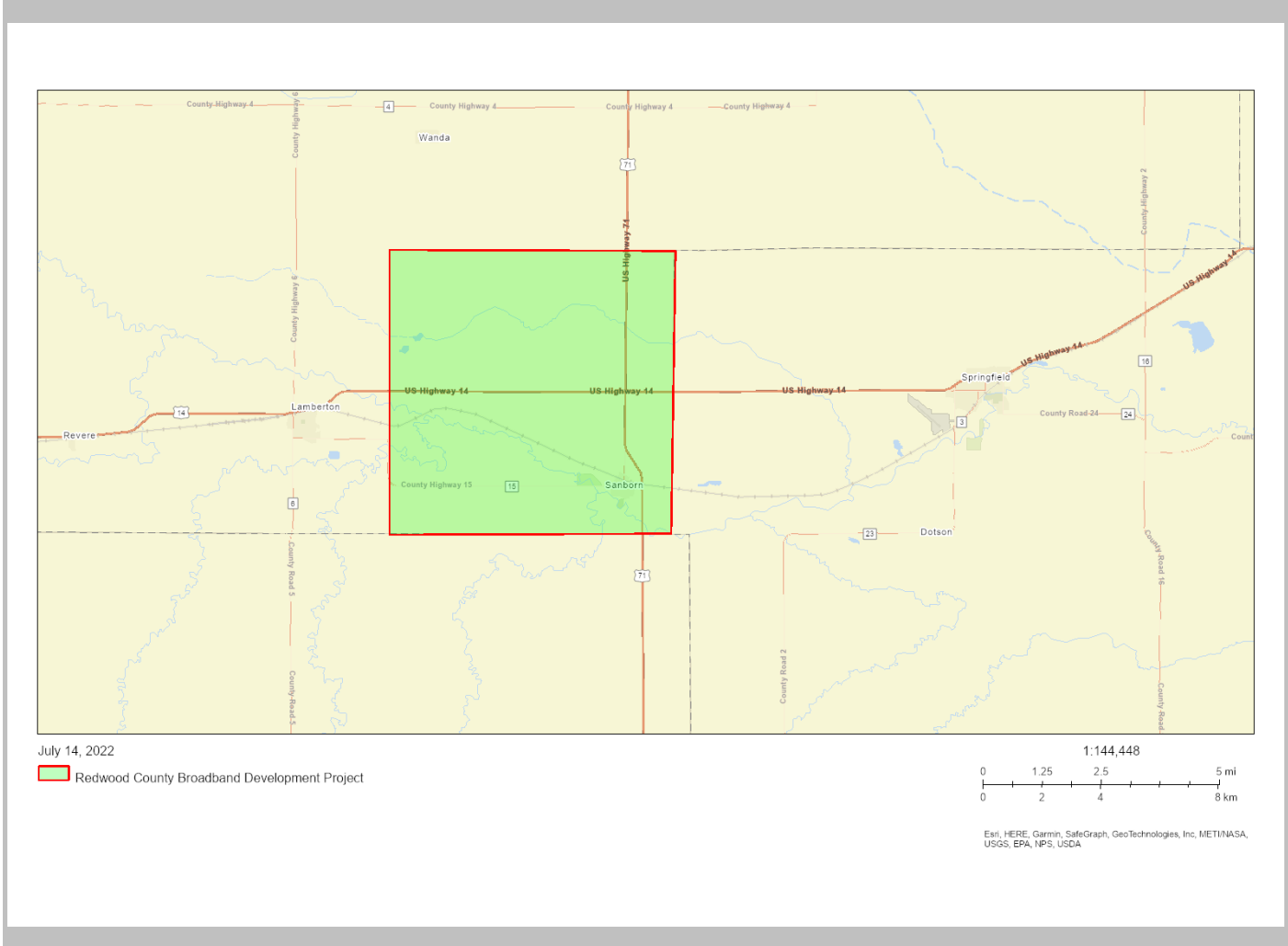
EJScreen Report (Version 2.0)

the User Specified Area, MINNESOTA, EPA Region 5

Approximate Population: 556

Input Area (sq. miles): 36.00

Redwood County Broadband Development Project



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.0)

the User Specified Area, MINNESOTA, EPA Region 5

Approximate Population: 556

Input Area (sq. miles): 36.00

Redwood County Broadband Development Project

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	6.59	7.54	15	8.96	3	8.74	8
Ozone (ppb)	39	37.8	83	43.5	11	42.6	26
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.0759	0.218	10	0.279	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	20	24	56	24	60-70th	29	<50th
2017 Air Toxics Respiratory HI*	0.2	0.29	36	0.3	<50th	0.36	<50th
Traffic Proximity (daily traffic count/distance to road)	11	470	10	610	8	710	8
Lead Paint (% Pre-1960 Housing)	0.69	0.31	87	0.37	81	0.28	88
Superfund Proximity (site count/km distance)	0.011	0.18	8	0.13	1	0.13	5
RMP Facility Proximity (facility count/km distance)	4.9	0.77	99	0.83	98	0.75	98
Hazardous Waste Proximity (facility count/km distance)	0.029	1.5	6	1.8	1	2.2	3
Underground Storage Tanks (count/km ²)	0.032	1.8	29	4.8	18	3.9	19
Wastewater Discharge (toxicity-weighted concentration/m distance)	N/A	0.034	N/A	9	N/A	12	N/A
Socioeconomic Indicators							
Demographic Index	18%	22%	54	28%	42	36%	26
People of Color	6%	20%	24	26%	24	40%	12
Low Income	31%	24%	71	29%	59	31%	55
Unemployment Rate	5%	4%	77	5%	63	5%	58
Linguistically Isolated	0%	2%	55	2%	59	5%	45
Less Than High School Education	13%	7%	85	10%	74	12%	64
Under Age 5	5%	6%	40	6%	46	6%	46
Over Age 64	23%	15%	84	16%	83	16%	83

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.