



Bureau of Aeronautics (BOA) Cultural Resources Frequently Asked Questions

See FDM Chapter 26 for further Cultural Resource Preservation guidance (DTSD policy). While the chapter does not fully and specifically cover the BOA processes covered here, a more general overview is provided. This FAQ seeks to simplify and supplement common and unique BOA Section 106-related questions.

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Airports with Cultural Requirements

1. Austin-Straubel International Airport (GRB)

Portions of this airport are within Oneida Tribal Reservation and require Tribal Historic Preservation Officer (THPO) coordination.

If work is proposed within the reservation, the project team should complete the Oneida Historic Preservation Office Cultural Review Permit Form – Clearance Letter PDF, available by contacting the CRT email (DOTCulturalResources@dot.wi.gov).

The project team should send the completed permit form to the [NE Region Tribal Liaison](#) via email and copy the BOA Environmental Coordinator and the CRT email (DOTCulturalResources@dot.wi.gov). The Tribal Liaison will coordinate with the Oneida THPO (see [THPO distribution list](#)).

If a portion of the project is outside of the reservation, the project team should also complete the streamlined Section 106 process (DT1665). If the entirety of the project is outside of the reservation, only the streamlined Section 106 process is required.

2. Wausau Downtown Airport (AUW)

This airport is determined eligible for listing in the National Register of Historic Places (National Register). Therefore, the streamlined Section 106 process is not applicable.

3. Cable Union Airport (3CU)

This airport is determined eligible for listing in the National Register. Therefore, the streamlined Section 106 process is not applicable.

Amendments ([FDM 26-5-1](#))

1. My project has a scope change/design refinement. Do I need an amendment?

A. Project activities are less than initially submitted (decrease in scope)

Streamlined Section 106 (DT1665):

- If the DT1665 included archaeology commitments/special provisions, notify CRT of the specific changes in project activities via email (DOTCulturalResources@dot.wi.gov). CRT will provide next steps.
- If the DT1665 did **not** include archaeology commitments/special provisions, no further action is required, and an amendment is not needed.

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Full Section 106 Process (DT1664):

- If the project decision on the DT1664 was, “No historic properties in the APE” OR “No historic properties affected,” no action is required, and an amendment is not needed. No need to contact CRT!
- If the project decision on the DT1664 was, “Historic properties may be affected by the project,” notify CRT of the specific changes in project activities via email (DOTCulturalResources@dot.wi.gov). CRT will draft a memo to file if needed. No further action is required, and an amendment is not needed.

B. Project activities are more than initially submitted – An amendment is required

Streamlined Section 106 (DT1665):

- If the project still meets the streamlined Section 106 criteria, the project team will submit an amended DT1665.
- If the project no longer meets the streamlined Section 106 criteria, the full Section 106 process is required. The project team should hire qualified professionals to complete the appropriate documentation.

Full Section 106 Process (DT1664):

- The project team will contact the qualified professional(s) and provide the following information:
 - a. The original DT1664 with State Historic Preservation Office (SHPO) concurrence
 - b. The newly proposed project activities and/or real estate requirements (location and narrative description)
- The qualified professional(s) will determine the next steps, which may include the following:
 - a. Additional field survey
 - b. Memo/letter report (separate documents for archaeology and architecture/history)

2. A new project ID and/or CATEX document is being created for my previously submitted Section 106 submittal. Is this an amendment?

No. Any time a new environmental document is created, a new Section 106 submittal is required (whether full or streamlined).

Assess Effects/MOA ([FDM 26-10-5.3](#))

- 1. The project decision is “Go to Step 4: Assess Effects.” What happens next?**

The project team will work with your qualified professionals and CRT to determine next steps. Information on Step 4: Assess Effects can be found in the [Toolkit for the Development of Section 106 Memoranda of Agreement](#).

Requests to Disturb (RTDs) for Uncatalogued Burials Only ([FDM 26-5-5.7.2](#))

- 1. When do I need an RTD (DT2551)?**

RTDs are required when a qualified archaeologist determines that a burial site boundary extends into the project’s APE. This is determined through the streamlined or full Section 106 process.

- 2. Whose responsibility is the RTD?**

The RTD is the responsibility of the project team.

- 3. When and how do I submit an RTD?**

The project team should complete and submit an RTD to CRT one year prior to the start of construction. All required information should be emailed to DOTCulturalResources@dot.wi.gov.

CRT submits the RTD to the Wisconsin Historical Society (WHS). Upon receipt, the WHS has 30 days to review and provide authorization.

- 4. How long is an RTD valid? What happens if construction extends beyond one year?**

An RTD is valid for one year from the date of WHS authorization/signature.

If work within the burial boundary will not be completed before the expiration of the RTD’s authorization, an extension is required. The project team can request an extension by submitting an updated DT2551 form with the “Extension” box selected.

- 5. Do I need to amend my RTD?**

If there is a change in project activities within the burial site boundaries, the project team should submit an amended DT2551 form. Select the “Amendment” box and complete the “Amended Project Description” portion.

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6. Is a monitor required on my project?

The need for an archaeological monitor is determined during WHS review of the RTD and will be indicated on the DT2551 form. If a monitor is required, CRT will convey this to the project team and include the assigned archaeological firm's contact information.

The archaeological monitor must be invited to the preconstruction meeting.

The assigned archaeological monitor will review project information and ensure the requirements called out in the DT2551 form are met and documented appropriately.

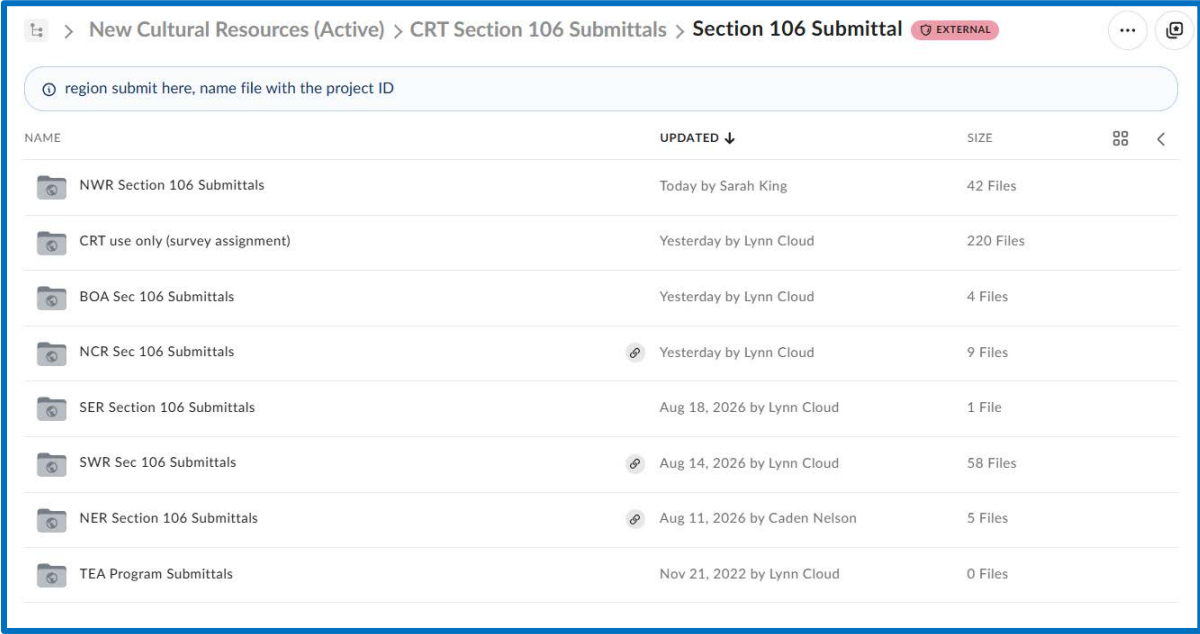
Section 106 Submittals

1. How do I submit my Section 106 to CRT?

The BOA REC submits the Section 106 to CRT via Box. RECs should have access to the Box submittal folder, [here](#). Contact DOTCulturalResources@dot.wi.gov if you have access issues.

Once in the Box submittal folder, follow these steps:

A. Access the BOA Section 106 Submittals folder.



The screenshot shows a Box web interface for a folder named 'Section 106 Submittal'. The breadcrumb trail is 'New Cultural Resources (Active) > CRT Section 106 Submittals > Section 106 Submittal'. A search bar contains the text 'region submit here, name file with the project ID'. Below the search bar is a table listing subfolders with columns for NAME, UPDATED, and SIZE.

NAME	UPDATED	SIZE
NWR Section 106 Submittals	Today by Sarah King	42 Files
CRT use only (survey assignment)	Yesterday by Lynn Cloud	220 Files
BOA Sec 106 Submittals	Yesterday by Lynn Cloud	4 Files
NCR Sec 106 Submittals	Yesterday by Lynn Cloud	9 Files
SER Section 106 Submittals	Aug 18, 2026 by Lynn Cloud	1 File
SWR Sec 106 Submittals	Aug 14, 2026 by Lynn Cloud	58 Files
NER Section 106 Submittals	Aug 11, 2026 by Caden Nelson	5 Files
TEA Program Submittals	Nov 21, 2022 by Lynn Cloud	0 Files

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B. Create a folder labeled with the WisDOT Project I.D.

CRT Section 106 Submittals > Section 106 Submittal > BOA Sec 106 Submittals EXTERNAL		
NAME	UPDATED ↓	SIZE
 [Project ID]	Today by Erin Kelly	0 Files

C. Upload the Section 106 files as PDFs to the project folder. At a minimum your project should have:

- 1) Section 106 Form (DT1664)
- 2) LettersPlans (LtrsPlns)
- 3) An Architecture/History report (History)
- 4) and/or Archaeology report (Arch)

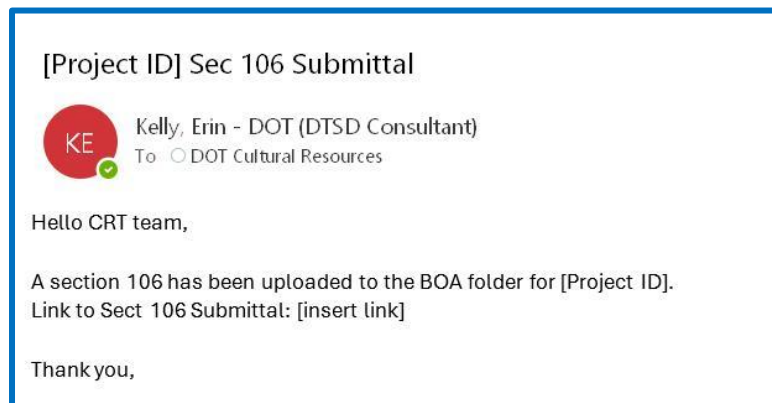
Section 106 Submittal > BOA Sec 106 Submittals > [Project ID] EXTERNAL		
NAME	UPDATED ↓	SIZE
 Arch.pdf	Today by Erin Kelly	86.6 KB
 History.pdf	Today by Erin Kelly	86.6 KB
 LtrsPlans.pdf	Today by Erin Kelly	86.6 KB
 [Project ID] Sec 106.pdf	Today by Erin Kelly	86.6 KB

- 5) If the project resulted in Determinations of Eligibility (DOEs) or a No Effect Letter/Documentation for Determination of No Adverse Effect (DNAE), those should be uploaded as separate PDFs

Section 106 Submittal > BOA Sec 106 Submittals > [Project ID] EXTERNAL		
NAME	UPDATED ↓	SIZE
 [Project ID] DNAE.pdf	Today by Erin Kelly	86.6 KB
 [Project ID] WPA Hangar 1 DOE.pdf	Today by Erin Kelly	86.6 KB
 Arch.pdf	Today by Erin Kelly	86.6 KB
 History.pdf	Today by Erin Kelly	86.6 KB
 LtrsPlans.pdf	Today by Erin Kelly	86.6 KB
 [Project ID] Sec 106.pdf	Today by Erin Kelly	86.6 KB

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- D. Once the REC has uploaded the Box materials, they should notify CRT via email (DOTCulturalResources@dot.wi.gov) that the Section 106 submittal is ready for review.



2. What if I don't have an FOS Project ID?

If your project requires Section 106 concurrence prior to FOS Project ID assignment, please submit the DT1664/DT1665 using the BOA Project ID and/or Aeronautics ID. Enter "TBD" in the DOT Project ID field.

Once an FOS Project ID is assigned, provide it to CRT via email (DOTCulturalResources@dot.wi.gov).

3. Can I use previous field surveys for a new project?

No. While the qualified professional(s) may reference previous survey coverage in Section 106 reports, the previous surveys/reports cannot be submitted themselves in place of a new report.

The qualified professional will determine the new level of documentation required to complete the Section 106 process (i.e. letter report, no survey letter, additional field survey).

4. How long does the Section 106 review process take once submitted to CRT?

Upon submittal of the Section 106 to Box, CRT takes up to 30 days to complete an initial review. At this point, CRT may ask for edits or clarification. CRT then submits the Section 106 to SHPO. Upon acceptance, SHPO has 30 days to review, comment, and/or concur.

5. Do I need to submit Temporary Support Activities (TSAs) for review?

Yes. If the project team is aware of proposed TSAs (e.g., borrow/waste/temporary stockpiles) at the start of the Section 106 process, they should be included in the project description of the full or Streamlined Section 106 form (DT1664/DT1665).

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If the project team did not include TSAs during the Section 106 process, see the [Construction Materials Manual Guidance](#) for information on how to complete the Requested Selected Site Areas form (DT1919) to get these activities reviewed.

State Projects (NO Federal Participation, DT1663)

- 1. How do I submit my State only (Cultural Resources Wis. Stat. §44.40) project?**
The BOA REC submits their State project via the same Box process as Full Section 106 projects. See [How do I submit my Section 106 to CRT?](#) for more information.
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Streamlined Section 106

- 1. What is a streamlined Section 106?**
The streamlined Section 106 is similar to the DTSD screening process; however, because the Federal Aviation Administration (FAA) is not a signatory to the Section 106 Delegation Programmatic Agreement (PA), SHPO concurrence is required.

The streamlined Section 106 process is appropriate for certain types of airport projects (not including parcel purchases) that have minimal potential to affect historic properties. These projects **must** be under 0.5 acres of new ground disturbance and/or real estate (TLE/FEE/PLE).

For a complete list of project criteria, see [FDM 26-5-5.2](#).

- 2. How do I submit my streamlined Section 106?**
The BOA REC submits their streamlined Section 106 via the same Box process as Full Section 106 projects. See [How do I submit my Section 106 to CRT?](#) for more information.
- 3. Can I provide documentation of prior ground disturbance?**
Yes, the project team should provide written documentation of previous disturbance and as-builts as attachments within the DT1665 submittal.
- 4. How long does the streamlined Section 106 process take?**
Upon submittal of the streamlined Section 106 to Box, CRT takes up to 30 days to complete an initial review. At this point, CRT may ask for edits or clarification. CRT then

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submits the streamlined Section 106 to SHPO. Upon acceptance, SHPO has 30 days to review, comment, and/or concur.

Note: if archaeological and/or burial sites are identified within the project area during review of the streamlined Section 106, additional research will need to be conducted to determine next steps. This review can take an additional 12 weeks.

Tribal, Property, and Historical Society Notifications

1. How do I complete THPO project notification ([FDM 26-5-1.5](#))?

See the guidance document for THPO notification, [here](#).

Additional information is available on the [CRT website](#).

Tribal Historic Preservation Officer (THPO) Notification Process

- [Guidance document](#) for THPO notification [Updated](#) December 8, 2025
- [Tribal Historic Preservation Officer \(THPO\) distribution/address list](#) for project notification [Updated](#) July 29, 2026
 - *All THPO notification is now completed through email - June 30, 2025*
- [Tribal Leaders address/distribution list](#) - for cc's [Updated](#) December 8, 2025

Federal Agency Coordination Templates

- [FHWA email template](#) (MS Outlook)
- [FAA \(Aeronautics\) Email template](#) (MS Outlook)
- [FRA Email Template](#) (MS Outlook)

State Agency Coordination Templates

- Highways, Aeronautics and Rails [State funding email template](#) (MS outlook)
- [Surplus Lands Email Template](#) (MS Outlook)

Scope Change (Amendments) Coordination Directions

- [Scope Change THPO Email Directions](#)

2. Do I need to complete property owner notification?

If project activities are occurring solely on Airport-owned property, property owner notification is not necessary. If any activities are occurring on property owned by any entity other than the Airport, property owner notification must be completed by the project team.

3. Do I need to complete historical society notification?

Yes, unless the project qualifies for the streamlined Section 106 process, historical society notification must be completed.

Historical society notification can be completed by the project team or a qualified historian.

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