

Section 106 Success Story

# ATC Tower Construction

CHARLEVOIX COUNTY

Section 106 Consultation is required for all FCC-permitted communication towers. A nationwide Programmatic Agreement (PA) stipulates the steps required for consultation, setting predictable standards for applicants and ensuring consultation catches historic properties before adverse effects occur. Among the proactive requirements of the PA is archaeological survey for areas where ground disturbance is proposed.

This model identified a historic property in Charlevoix County and enabled the applicant to redesign their project to avoid adverse effects. ATC, a consulting firm on behalf of the applicant, employed a qualified professional in the field to conduct archaeological survey. The consultant knew the area was archaeologically sensitive because of background research available in the State Archaeological Site File, which is managed by the State Historic Preservation Officer (SHPO). During survey, upon encountering a burned layer, well-below the plow zone, the consultant immediately stopped and contacted the SHPO. The SHPO, in consultation with Little Traverse Bay Band (LTBB) Tribal Historic Preservation Officer, agreed that the site was likely a burial. After additional consultation between SHPO, LTBB, and ATC, ATC decided the best course would be complete avoidance. This early identification exemplifies the importance of thoughtful consultation, and saved the Tribe, agency, and applicant from mitigating an adverse effect.

## LOCATION

Charlevoix County

## CONGRESSIONAL DISTRICT

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## FEDERAL AGENCY

Federal Communications Commission

## PROJECT DATE

2026

MICHIGAN SHPO STATE HISTORIC PRESERVATION OFFICE