



APPENDIX B - AGENCY CORRESPONDENCE





FAA/DAHP CORRESPONDENCE

JULY 21, 2023





Allyson Brooks Ph.D., Director
State Historic Preservation Officer

July 21, 2023

Ms. Amanda Ogden
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration

In future correspondence please refer to:
Project Tracking Code: 2023-06-03808
Property: Pangborn Memorial Airport General Aviation Terminal Building
Re: Adverse Effect

Dear Ms. Ogden:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.

First, we concur with the area of potential effect, as mapped in your documentation. We also concur that the project as proposed will have an adverse effect on a resource listed in, or eligible for listing in, the National Register of Historic Places.

In view of our concurrence on the adverse effect determination, we look forward to further consultation and the development of a Memorandum of Agreement (MOA). The MOA shall identify specific measures that when implemented will serve to mitigate the adverse effect on the property.

Also, we appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult for this project. Our comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov





AGENCY SCOPING LETTERS

JUNE 2, 2023



Patrick Waite

From: Vince Barthels
Sent: Wednesday, June 7, 2023 1:58 PM
To: Patrick Waite
Subject: FW: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,

Follow Up Flag: Follow up
Flag Status: Completed

FYI -



Vince Barthels
Environmental Services Manager
M: (509) 951-9564
1717 S. Rustle, Suite 201, Spokane, WA 99224
vbarthels@ardurra.com | www.ardurra.com



From: Pentico, Eric D (DFW) <Eric.Pentico@dfw.wa.gov>
Sent: Wednesday, June 7, 2023 8:53 AM
To: Vince Barthels <vbarthels@ardurra.com>
Subject: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,

Vince,

Good morning.

Thank you for contacting and allowing WDFW to review the proposed actions to rehabilitate the GA Terminal Building at Pangborn Memorial Airport. There are no perceived impacts to fish and wildlife functions and values with the proposed actions, and WDFW has no concerns regarding this proposal.

Eric

Eric Pentico
Washington Department of Fish and Wildlife
Habitat Biologist
Region 2 Office – Ephrata, WA
Office: (509) 754-4624 ext. 215
Cell : (509) 630-2729
Email : eric.pentico@dfw.wa.gov
Work Schedule: Mon.-Thurs - 6:30 a.m to 8:00 a.m. email and cellular phone



6/2/2023

Susan Sturges, NEPA Reviewer, Transportation Sector Lead
Environmental Protection Agency, Region 10
1200 6th Ave, Suite 155, MS 14-D12
Seattle, WA 98101

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Ms. Sturges,

Pangborn Memorial Airport (Airport) is in the process of preparing an Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) for the Federal Aviation Administration (FAA) in order to assess the environmental impacts of the proposed improvements at the Airport.

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If you would like additional information, have comments, or wish to discuss the project in further detail, please contact Vince Barthels, Environmental Services Manager, by phone at (509) 951-9564 or by email at vbarthels@ardurra.com, or by mail at 1717 S. Rustle Street, Suite 201, Spokane, WA 99224 no later than July 2, 2023.

Sincerely,

Vince Barthels, MPA

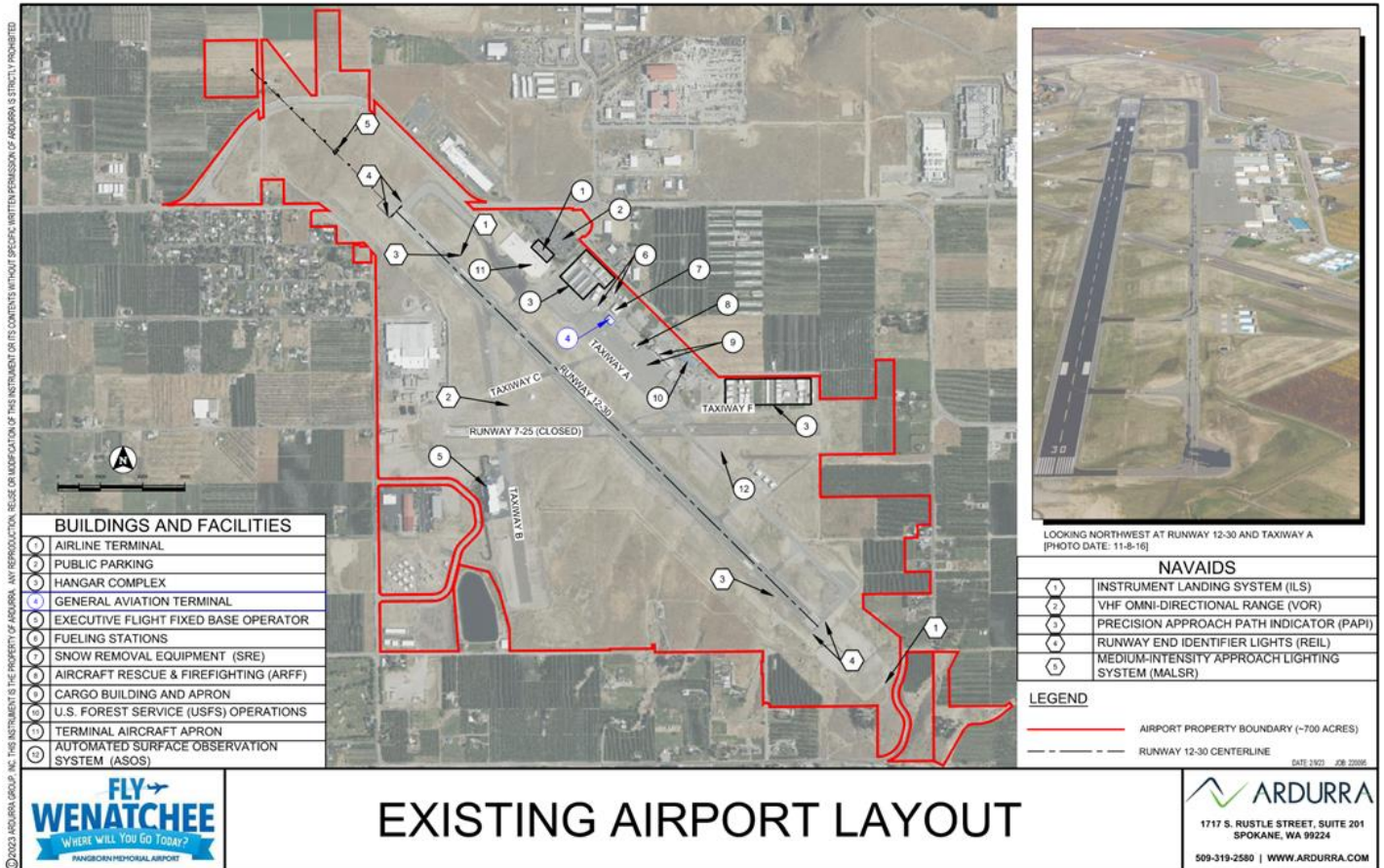


Figure 1: Existing Airport Layout.



Figure 2: Existing GA Terminal building (above) and an architectural rendering of the rehabilitated building (Proposed Action).



6/2/2023

Sage Park, Central Regional Union Gap Director
Washington Department of Ecology
1250 West Alder St
Union Gap, WA 98903-0009

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Ms. Park,

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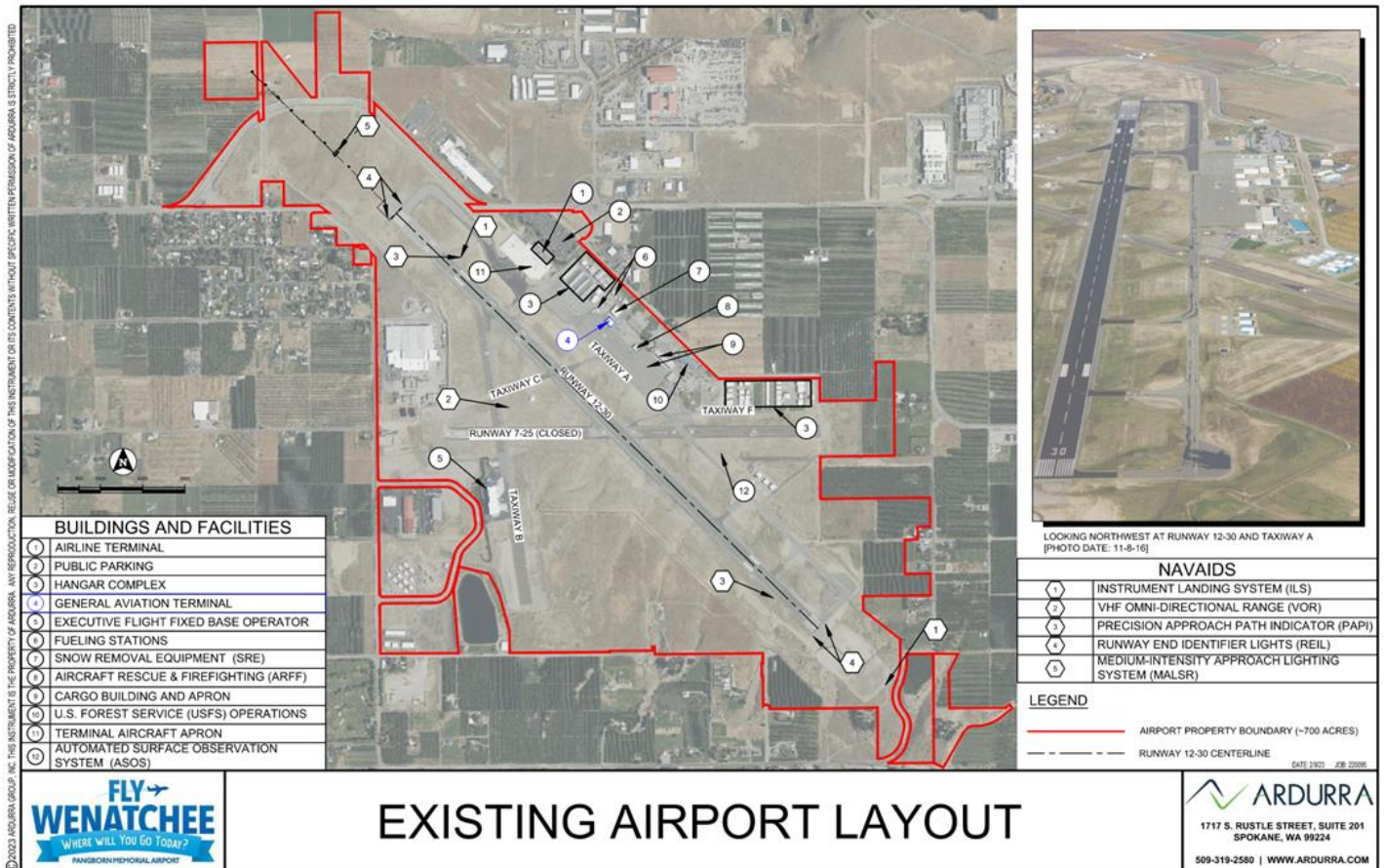


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6/2/2023

Jim Brown, North Central Director
Washington Department of Fish and Wildlife
1550 Alder Street NW
Ephrata, WA 98823-9699

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Brown,

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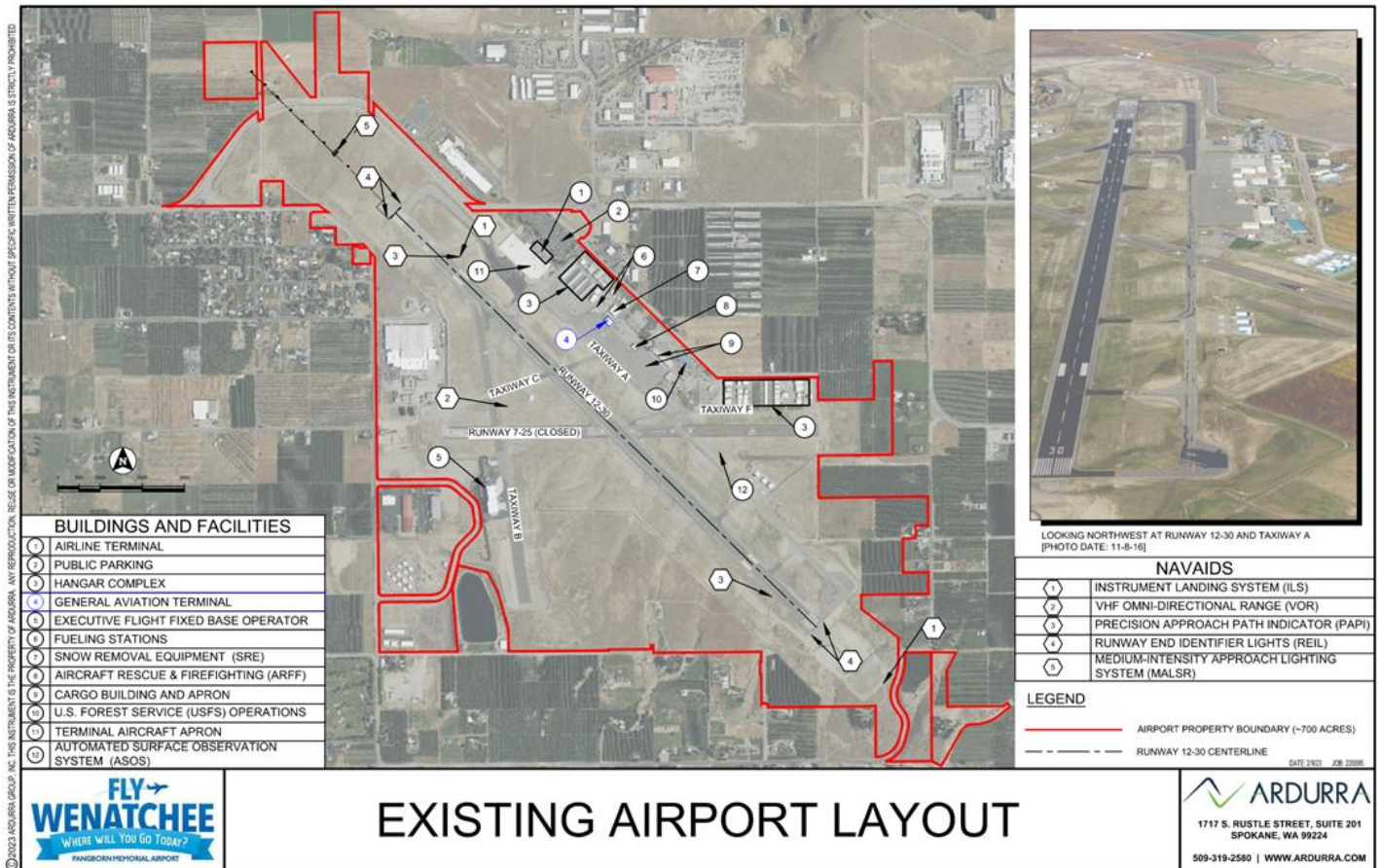


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6/2/2023

Kelly Susewind, Director
Washington Department of Fish and Wildlife
1111 Washington St SE
Olympia, WA 98501

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Susewind,

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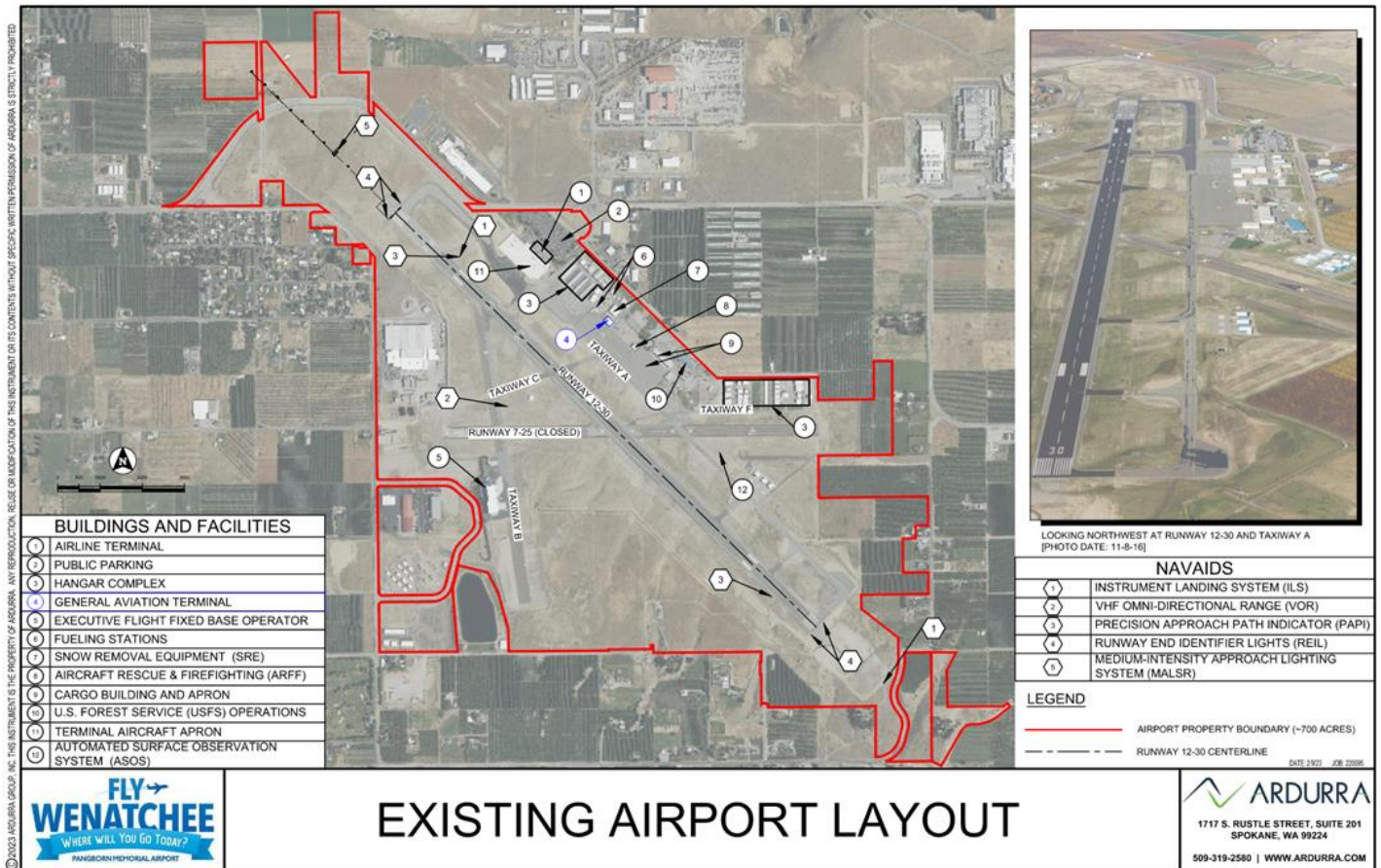


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6/2/2023

Frank Lands, Regional Director National Park Service
National Park Service, Region 10
333 Bush St, Suite 500
San Francisco, CA 94104

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Lands,

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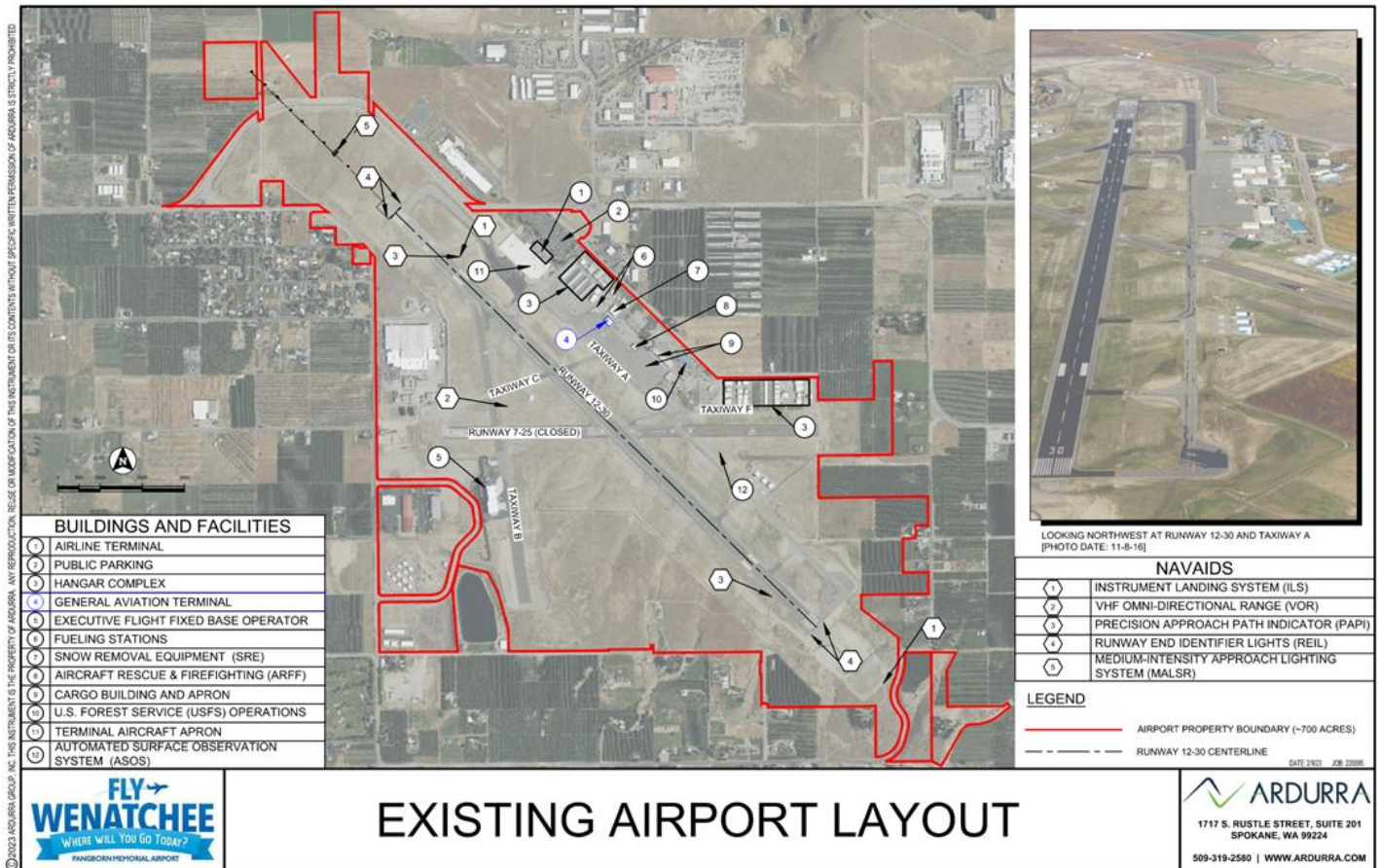


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6/2/2023

Roylene Comes At Night, State Conservationist
USDA – Natural Resources Conservation Service
11707 E Sprague Ave, Suite 301
Spokane Valley, WA 99206

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Ms. Comes At Night,

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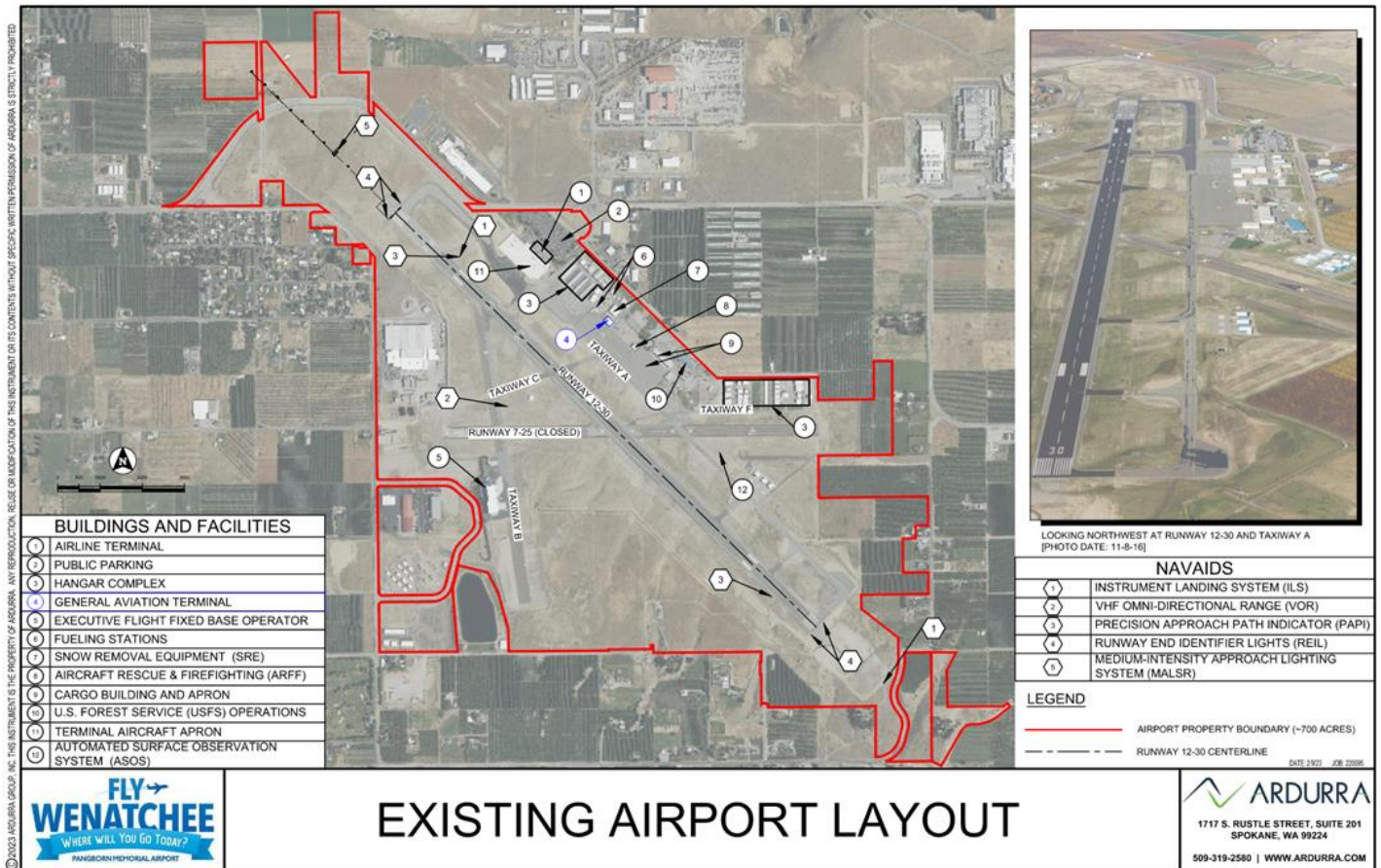


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6/2/2023

Hazardous Waste & Toxics Reduction
Washington Department of Ecology
300 Desmond Dr SE
Lacey, WA 98503

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Hazardous Waste & Toxics Reduction,

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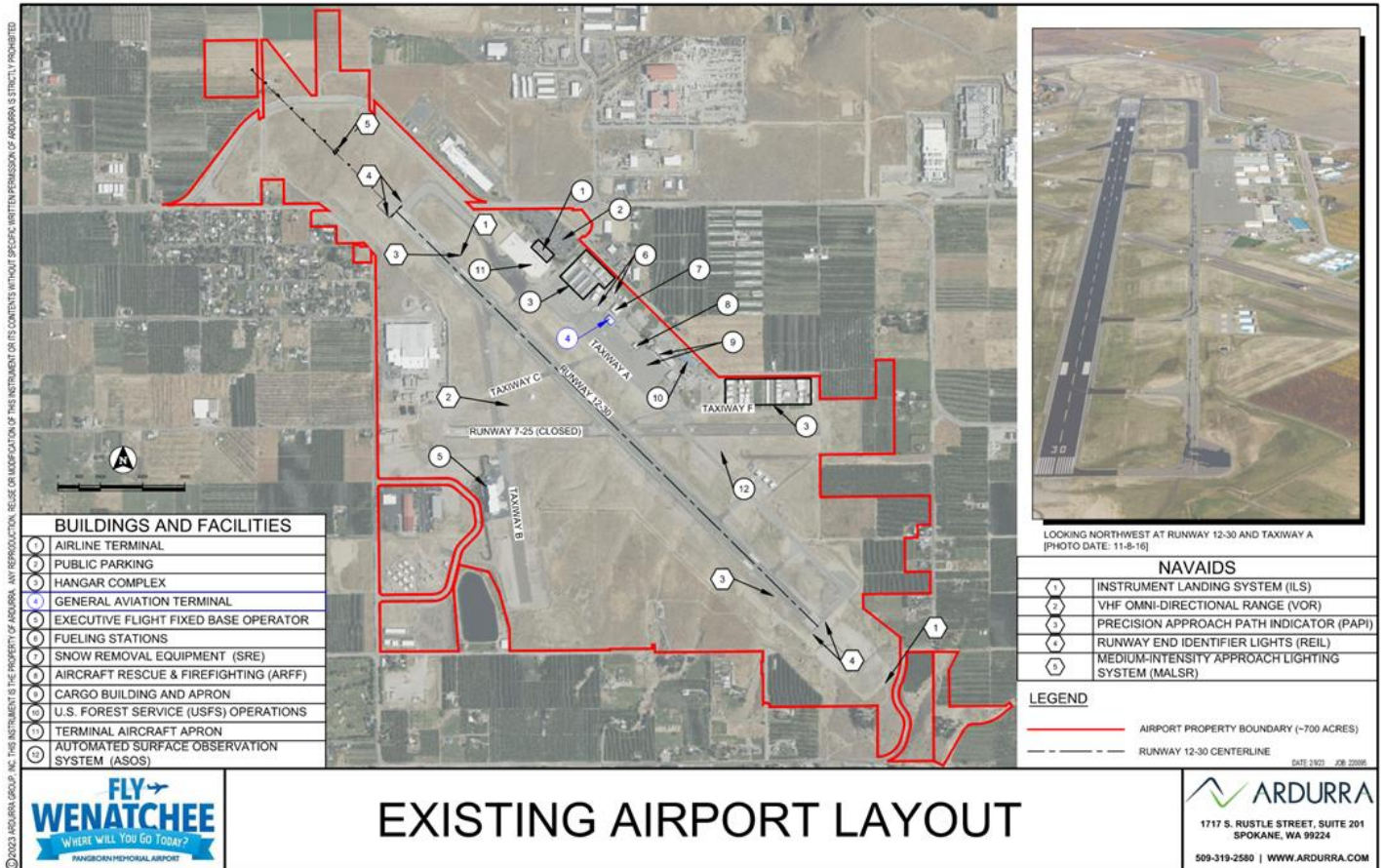


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6/2/2023

James Barker, County Administrator
Douglas County
140 19th St NW
East Wenatchee, WA 98802

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Barker,

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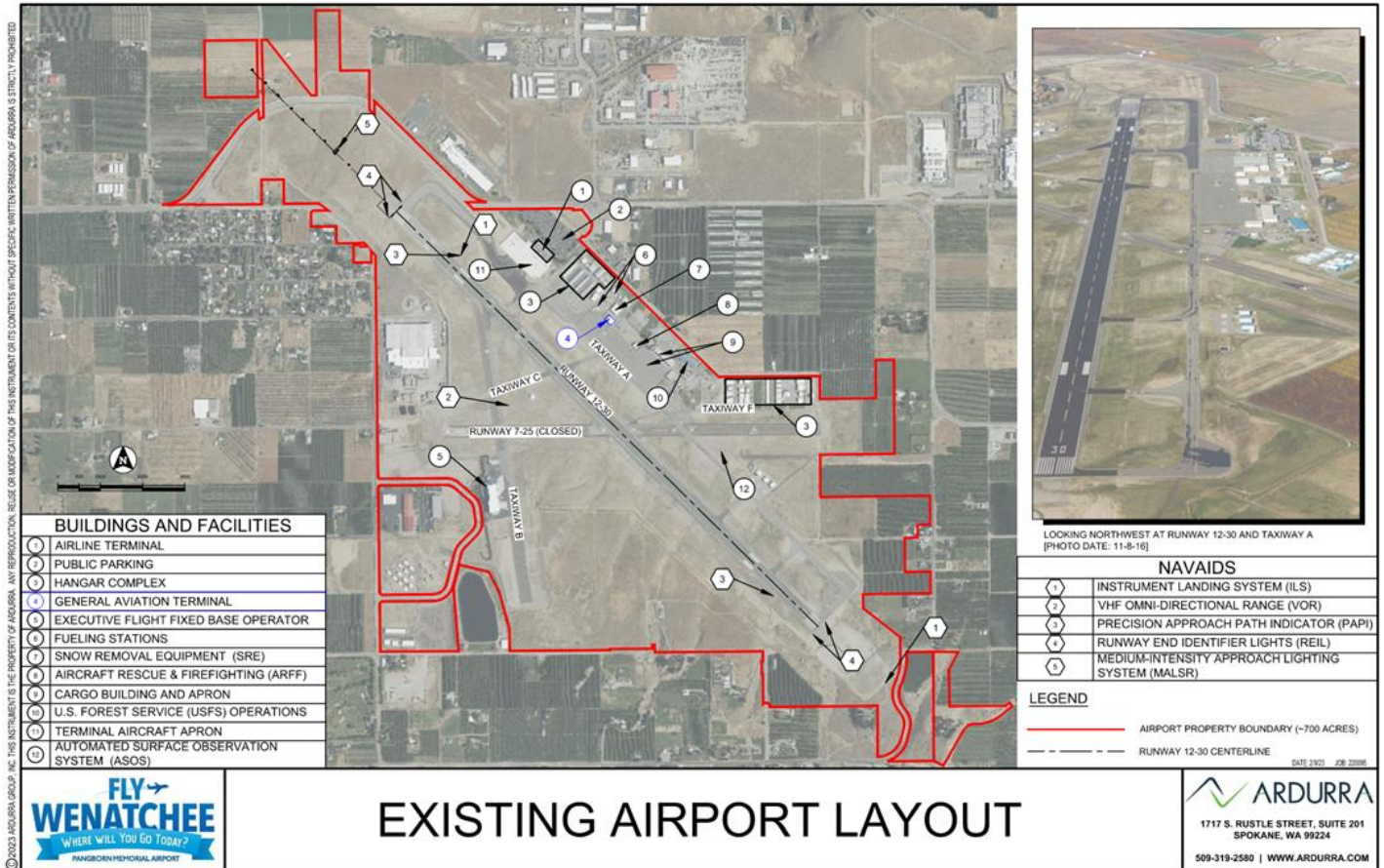


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6/2/2023

David Bierschbach, Regional Administrator
Washington Department of Transportation - North Central Region
2830 Euclid Ave
Wenatchee, WA 98801-5916

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Bierschbach,

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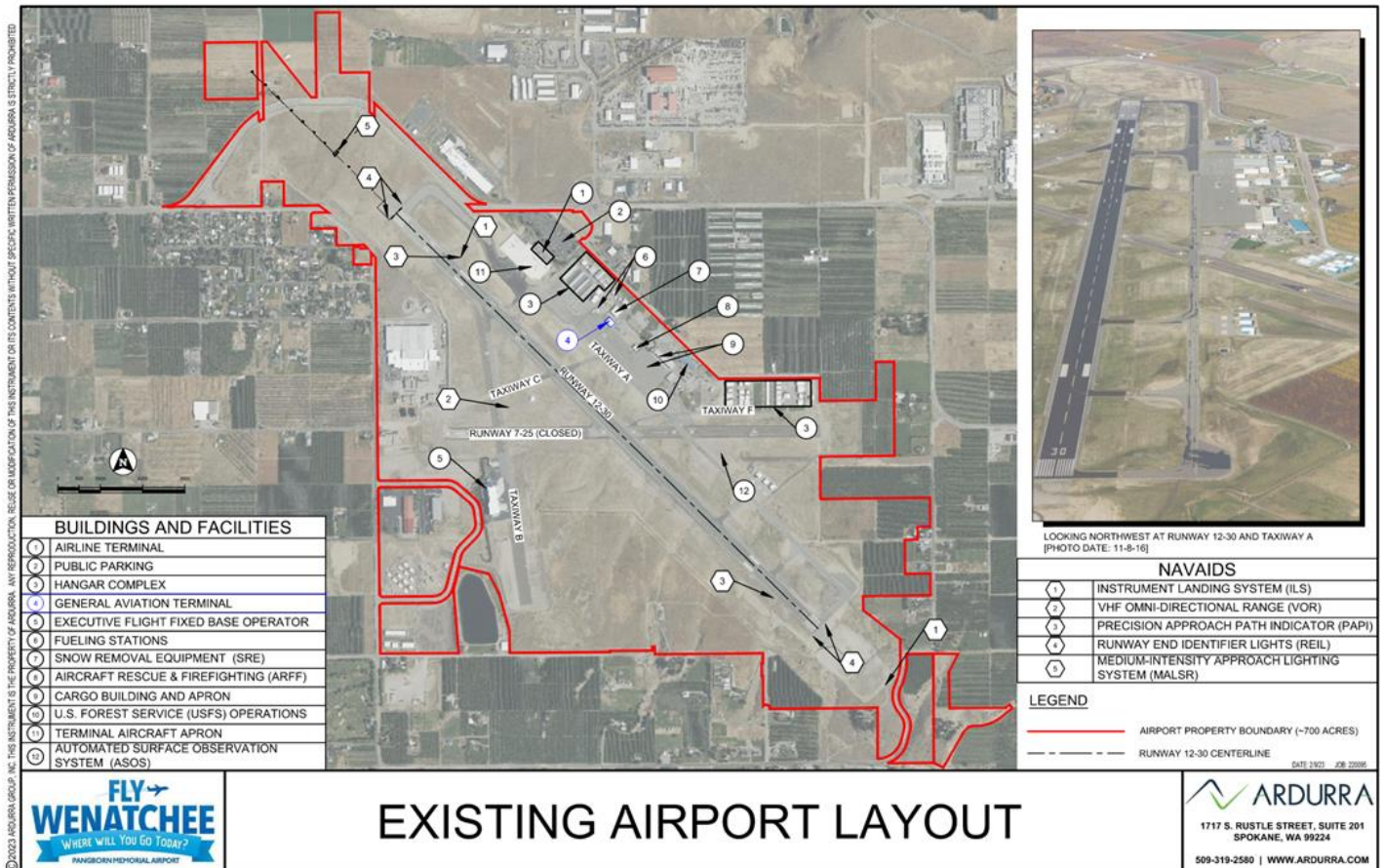


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6/2/2023

East Wenatchee Office
Douglas County P.U.D.
1151 Valley Mall Parkway
East Wenatchee, WA 98802

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East Wenatchee, Washington**

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If you would like additional information, have comments, or wish to discuss the project in further detail, please contact Vince Barthels, Environmental Services Manager, by phone at (509) 951-9564 or by email at vbarthels@ardurra.com, or by mail at 1717 S. Rustle Street, Suite 201, Spokane, WA 99224 no later than July 2, 2023.

Sincerely,

Vince Barthels, MPA

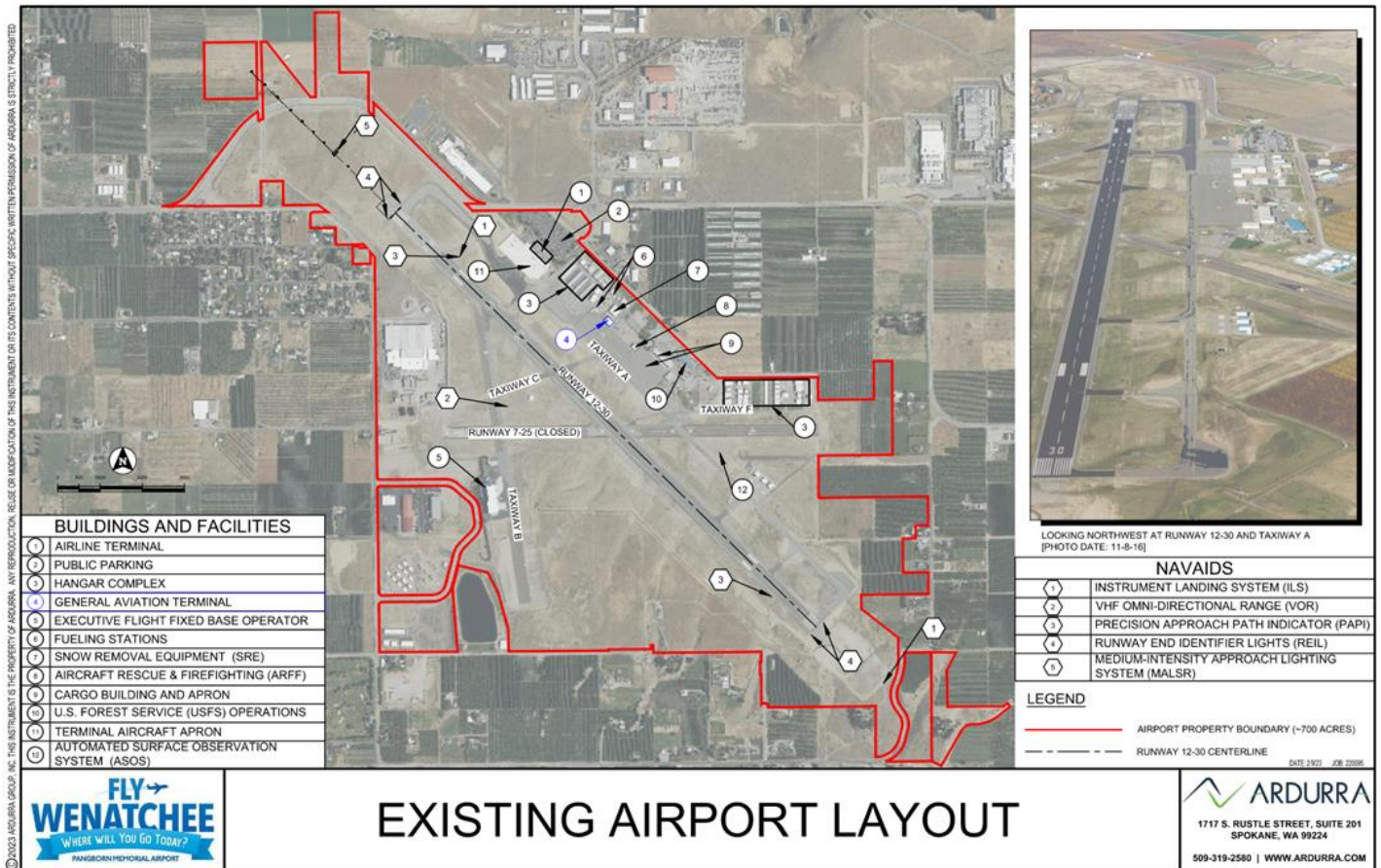


Figure 1: Existing Airport Layout.



Figure 2: Existing GA Terminal building (above) and an architectural rendering of the rehabilitated building (Proposed Action).



6/2/2023

Kelly Cooper, Policy and Legislative Relations, Director
Washington State Department of Health
PO Box 47835
Olympia, WA

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Ms. Cooper,

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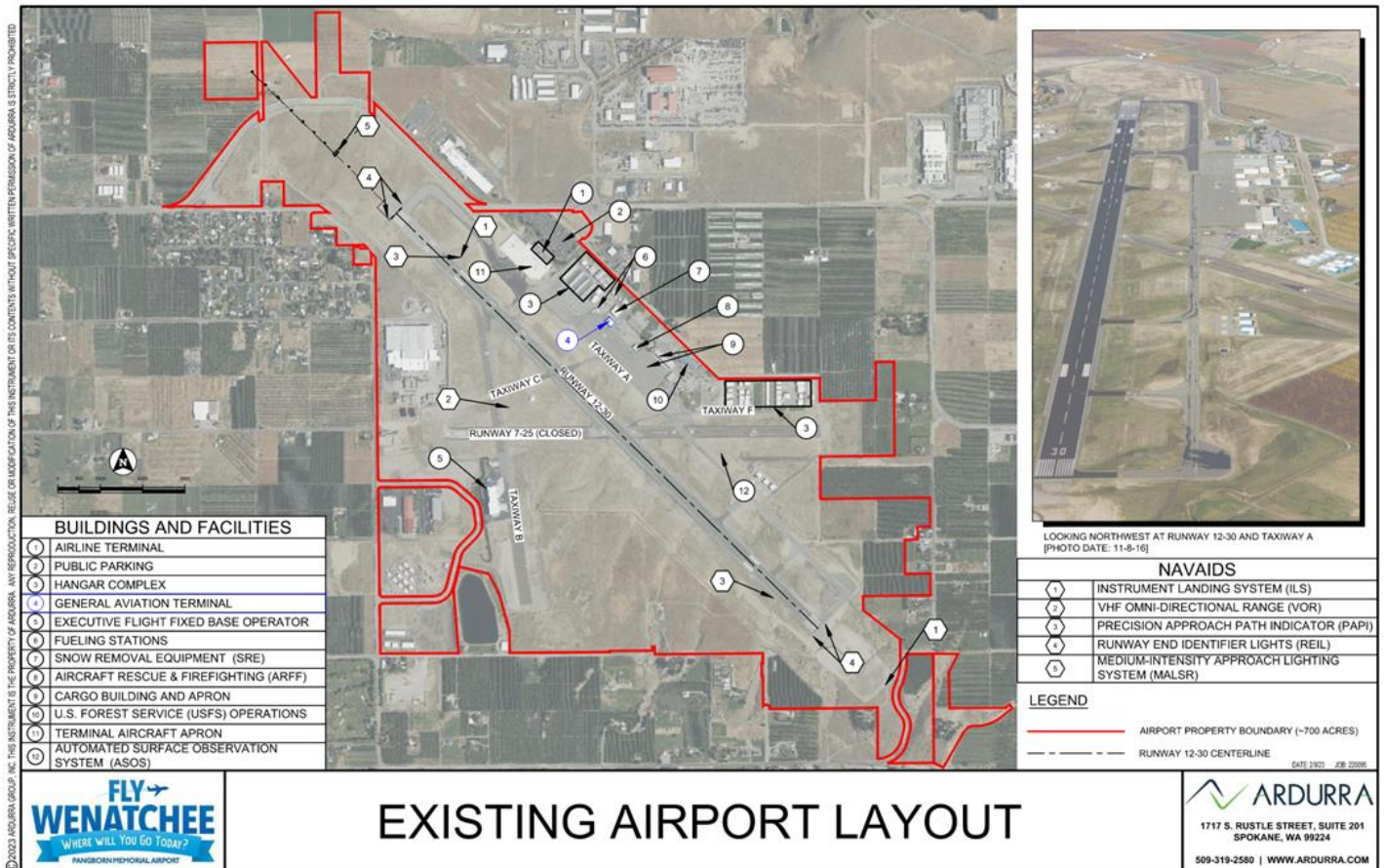


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6/2/2023

Julie Lam, Regional Director
U.S. Census Bureau, Los Angeles Regional Office
2300 West Empire Ave, Suite 300
Burbank, CA 91504

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Ms. Lam,

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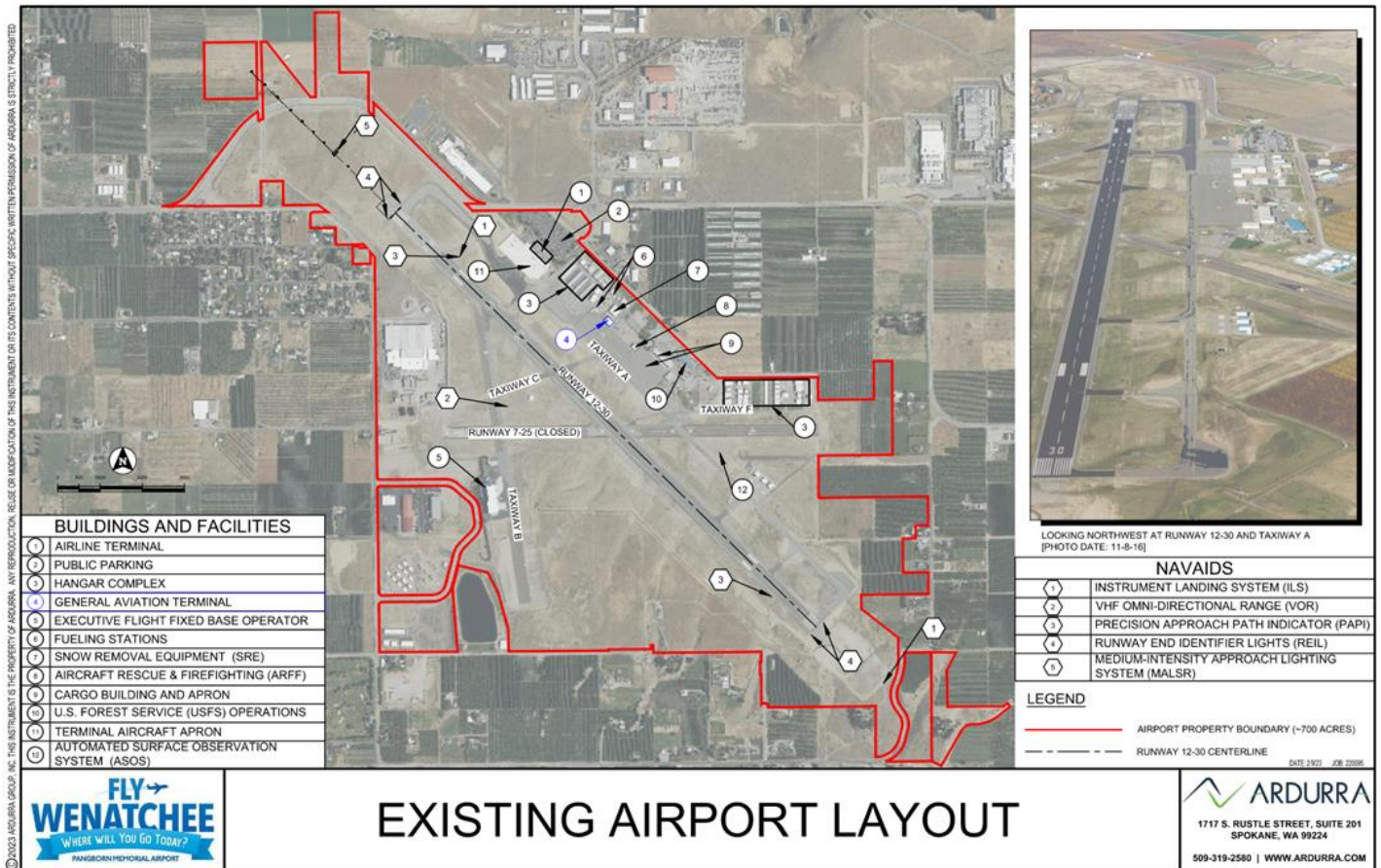


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6/2/2023

Laurie Morgan, Hydrogeologist
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Ms. Morgan,

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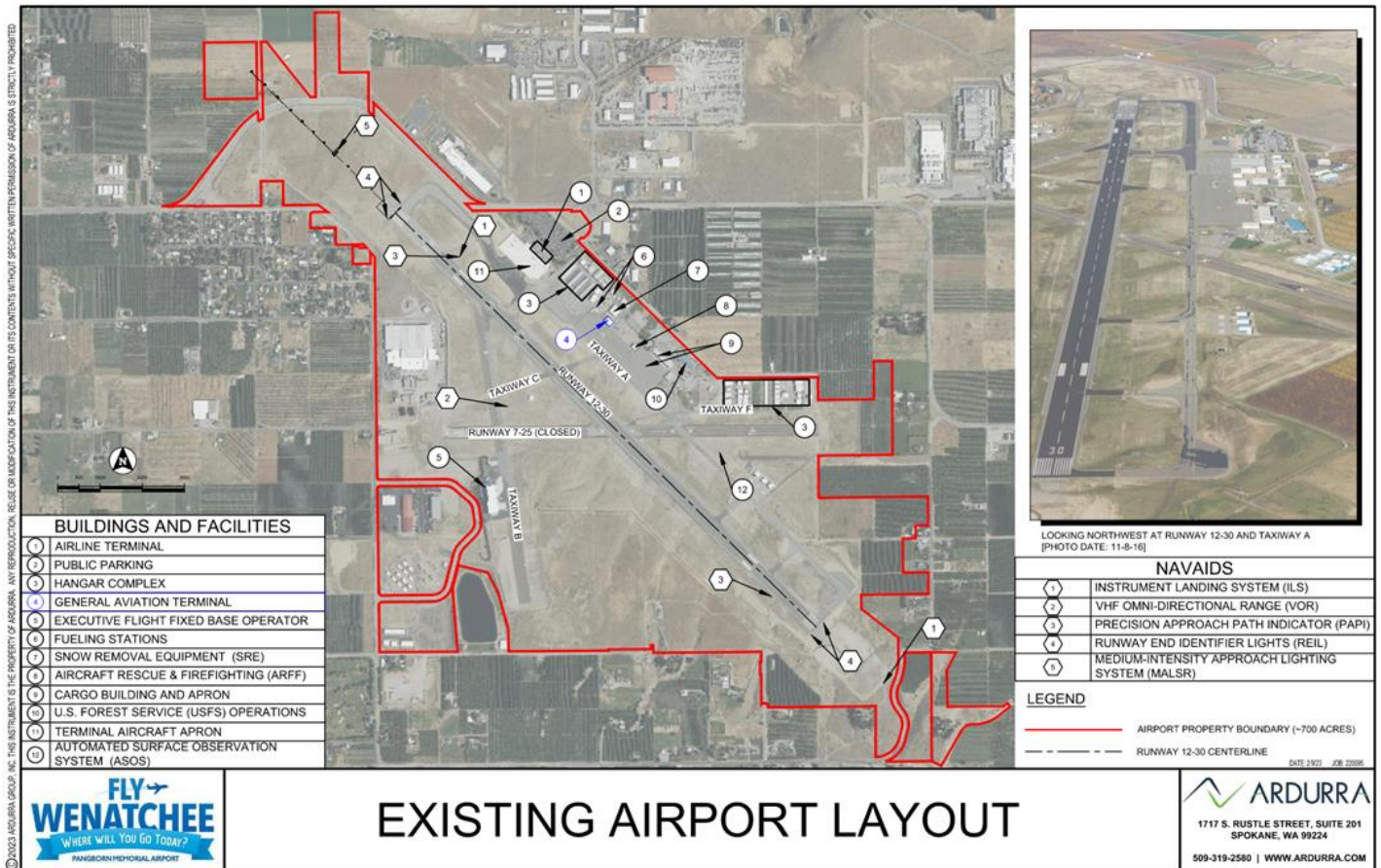


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6/2/2023

Bryson Finch, Surface Water Quality Standards Scientist
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Finch,

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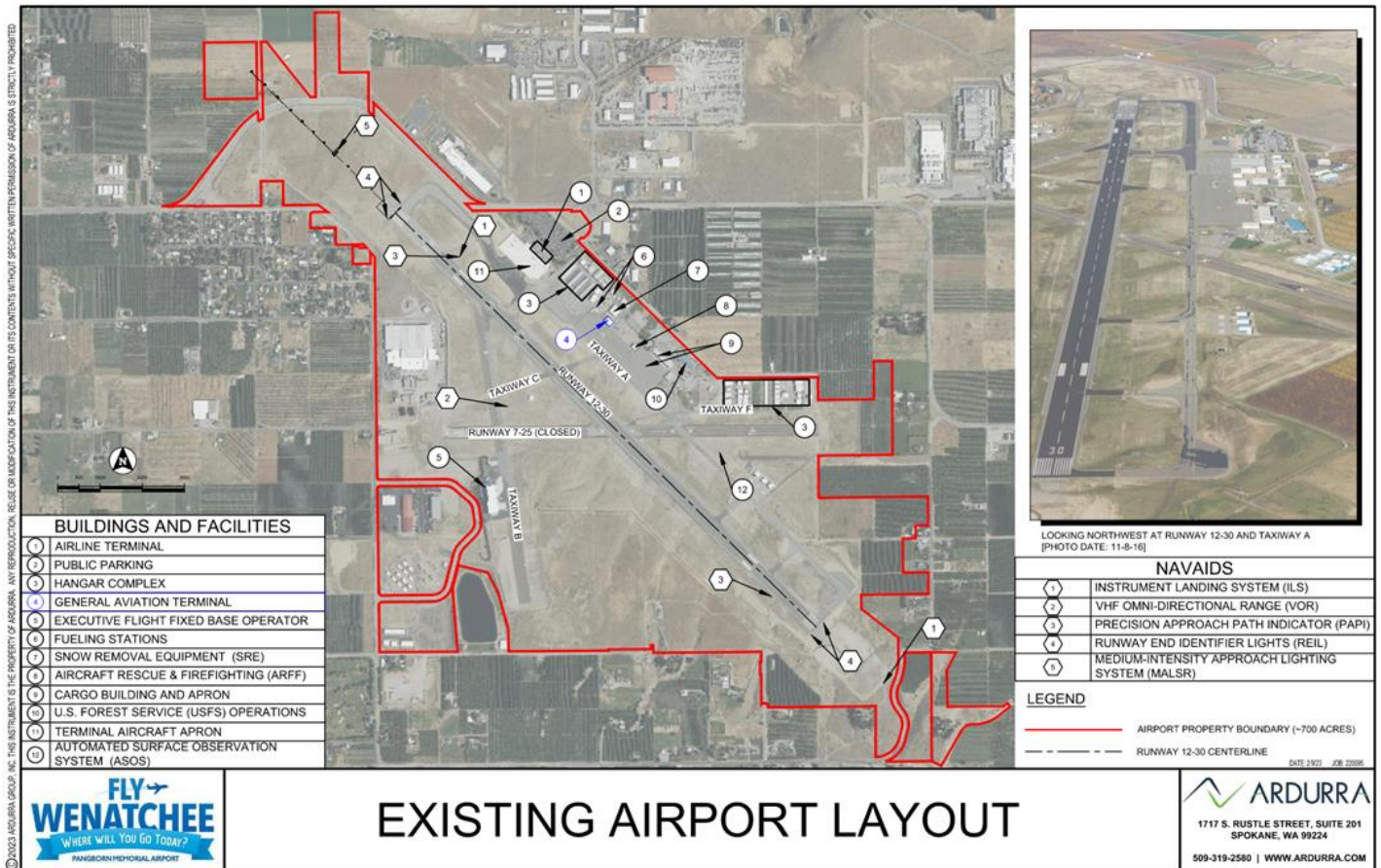


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6/2/2023

Federal Emergency Management Agency, Federal Regional Center
FEMA, Region X
130 - 228th St
Southwest Bothell, WA 98021

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Federal Emergency Management Agency,

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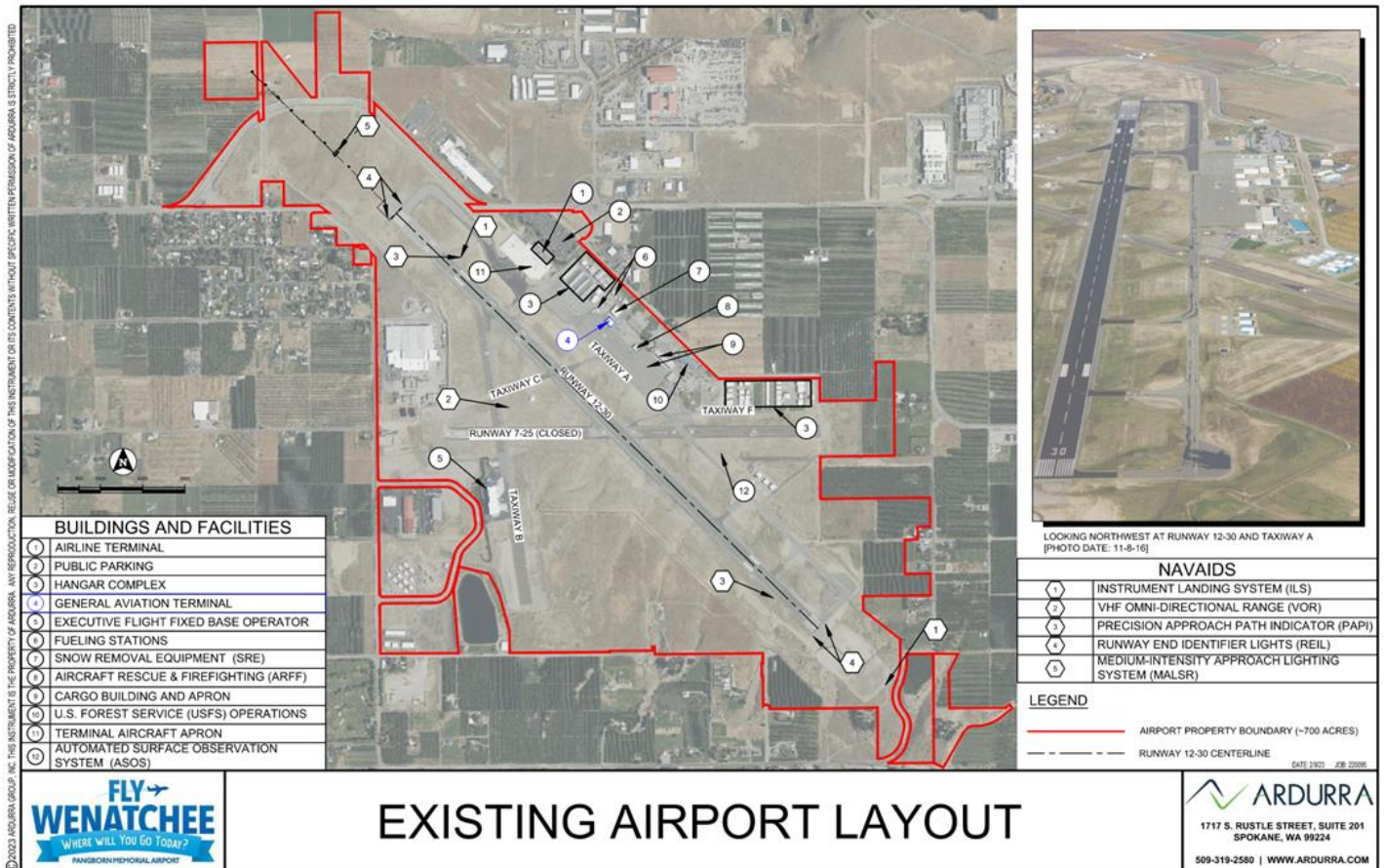


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6/2/2023

Jess Jordan, Regulatory Project Manager
U.S. Army Corps of Engineers
PO Box 3755
Seattle, WA 98124-3755

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Jordan,

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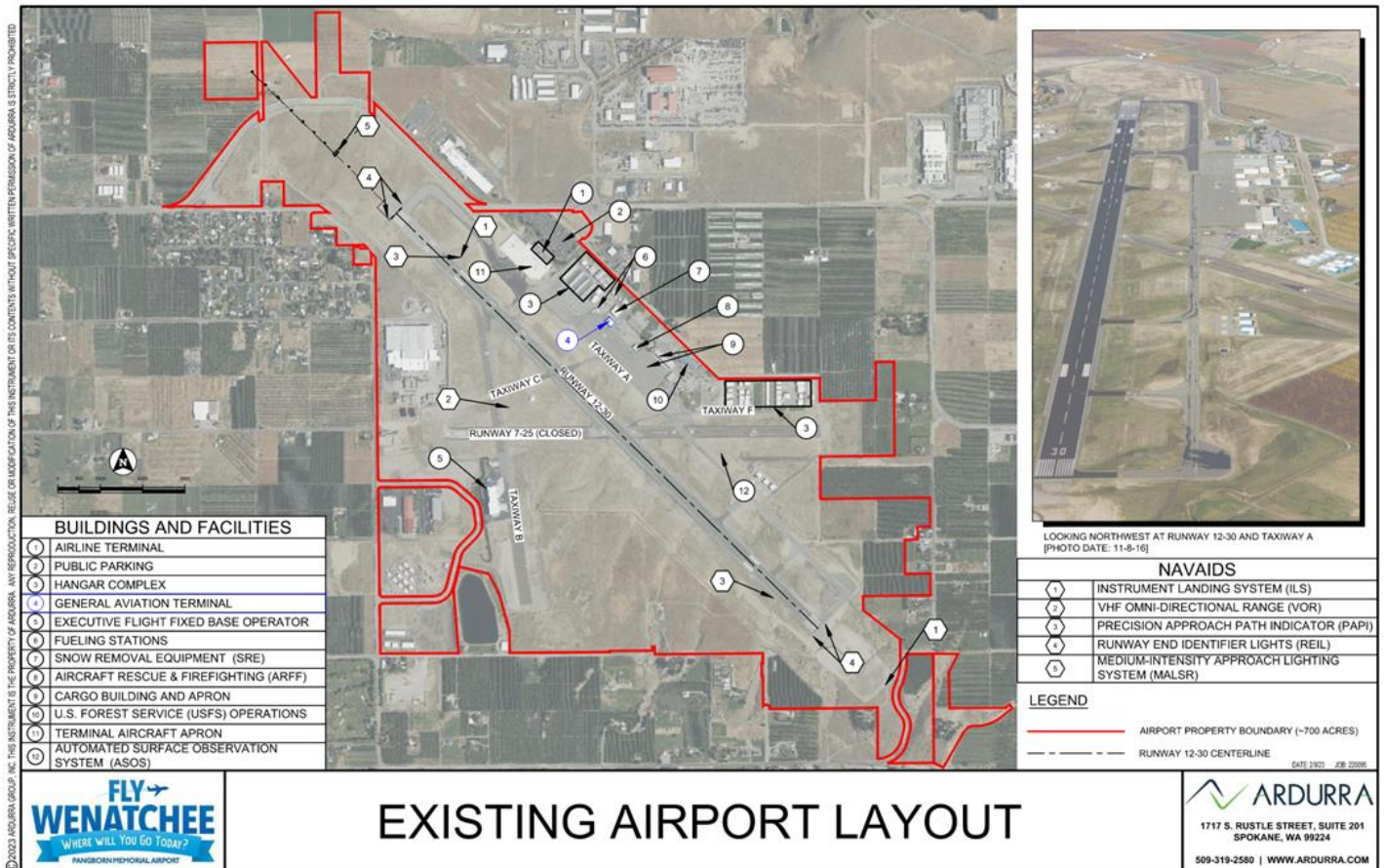


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6/2/2023

Gerald Lewis, Chairman
Confederated Tribes and Bands of the Yakama Nation
401 Fort Rd
Toppenish, WA 98948

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Lewis,

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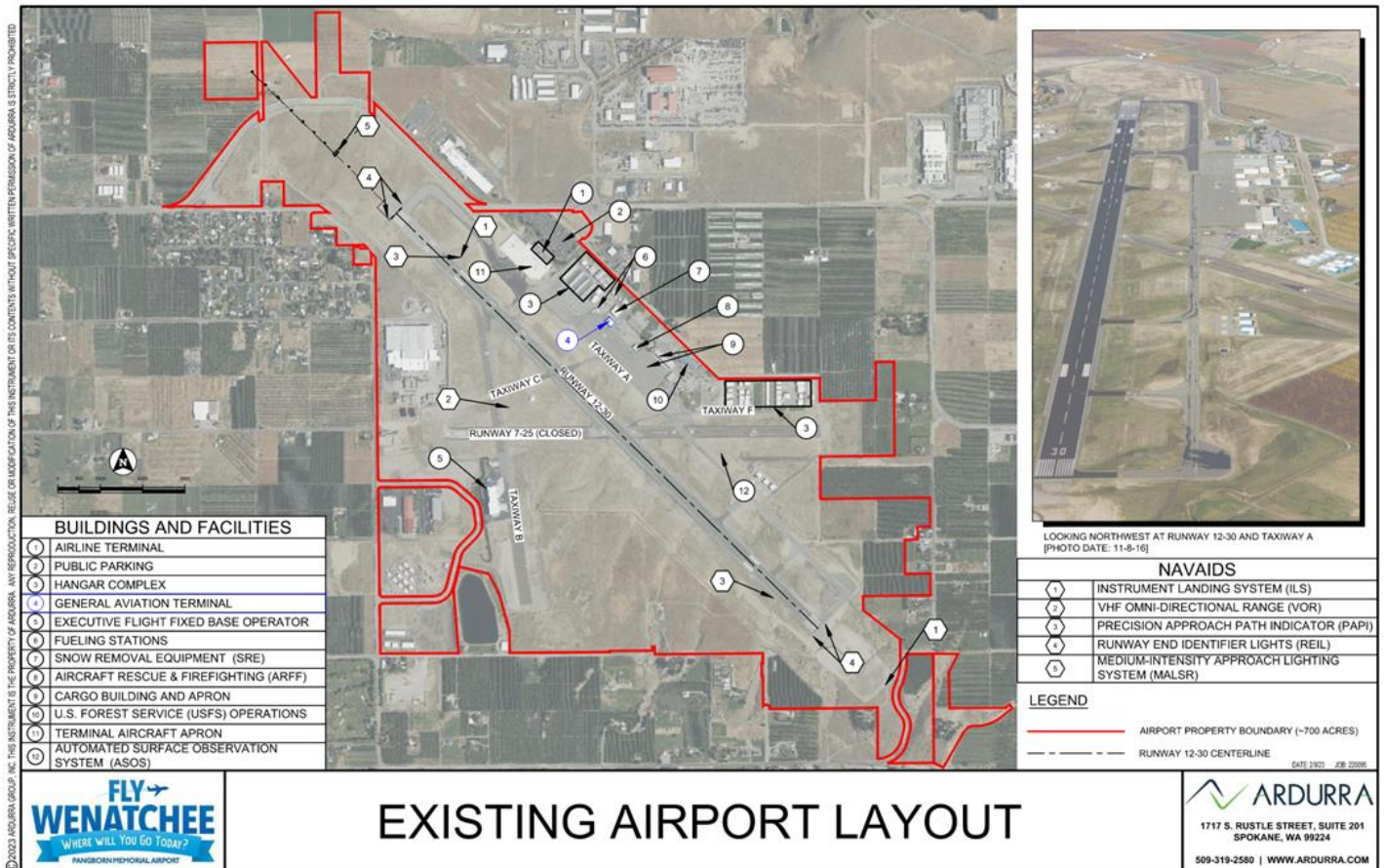


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6/2/2023

Jarred-Michael (Jarred) Erickson, Chairman
Confederated Tribes of the Colville Reservation
1 Colville St
Nespelem, WA 99155

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

Dear Mr. Erickson,

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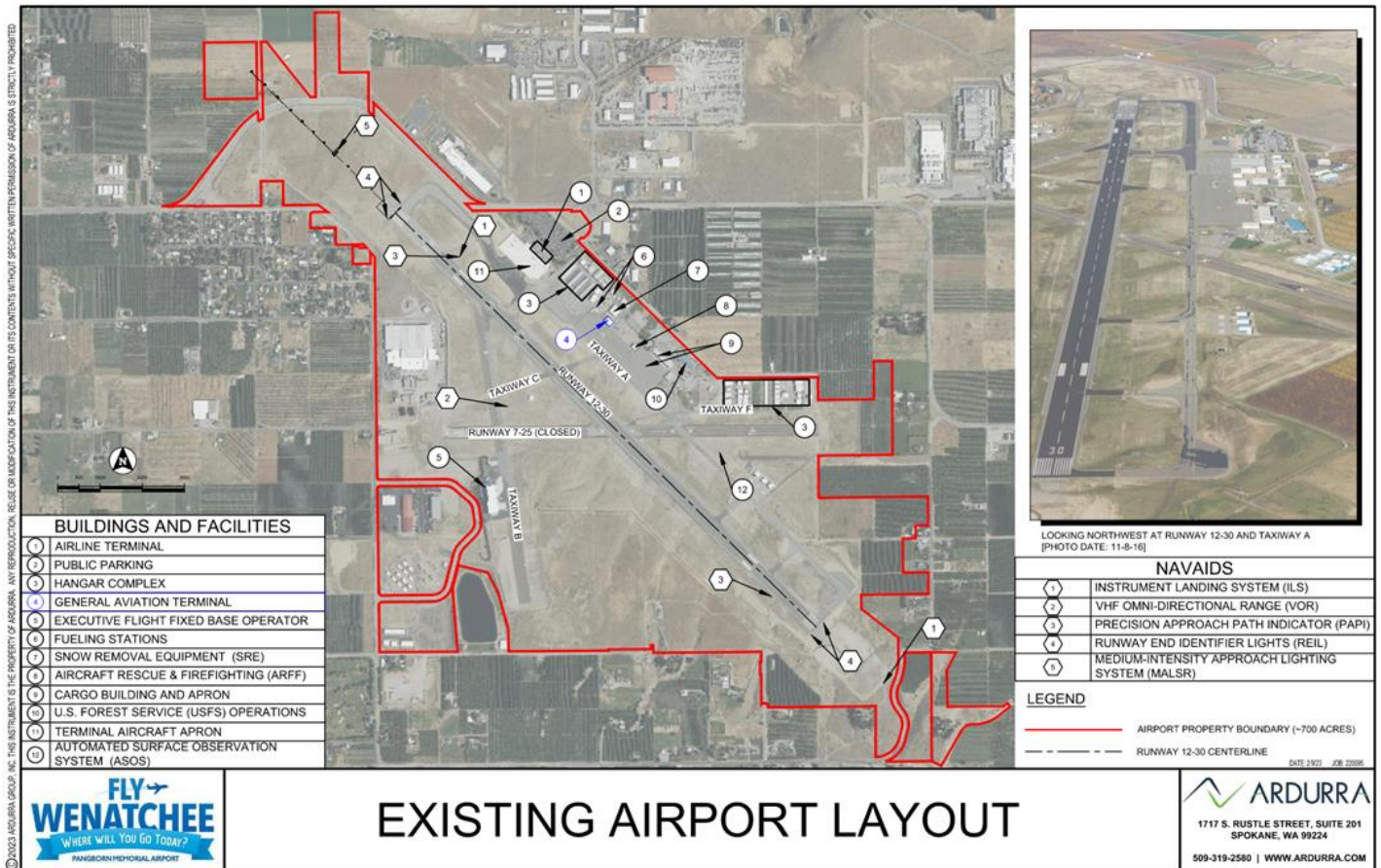


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6/2/2023

Jonathan Smith, Chairman
Confederated Tribes of the Warm Springs Reservation of Oregon
1233 Veterans St
Warm Springs, OR 97761

**RE: Environmental Assessment for the GA Terminal Building at the Pangborn Memorial Airport,
East Wenatchee, Washington**

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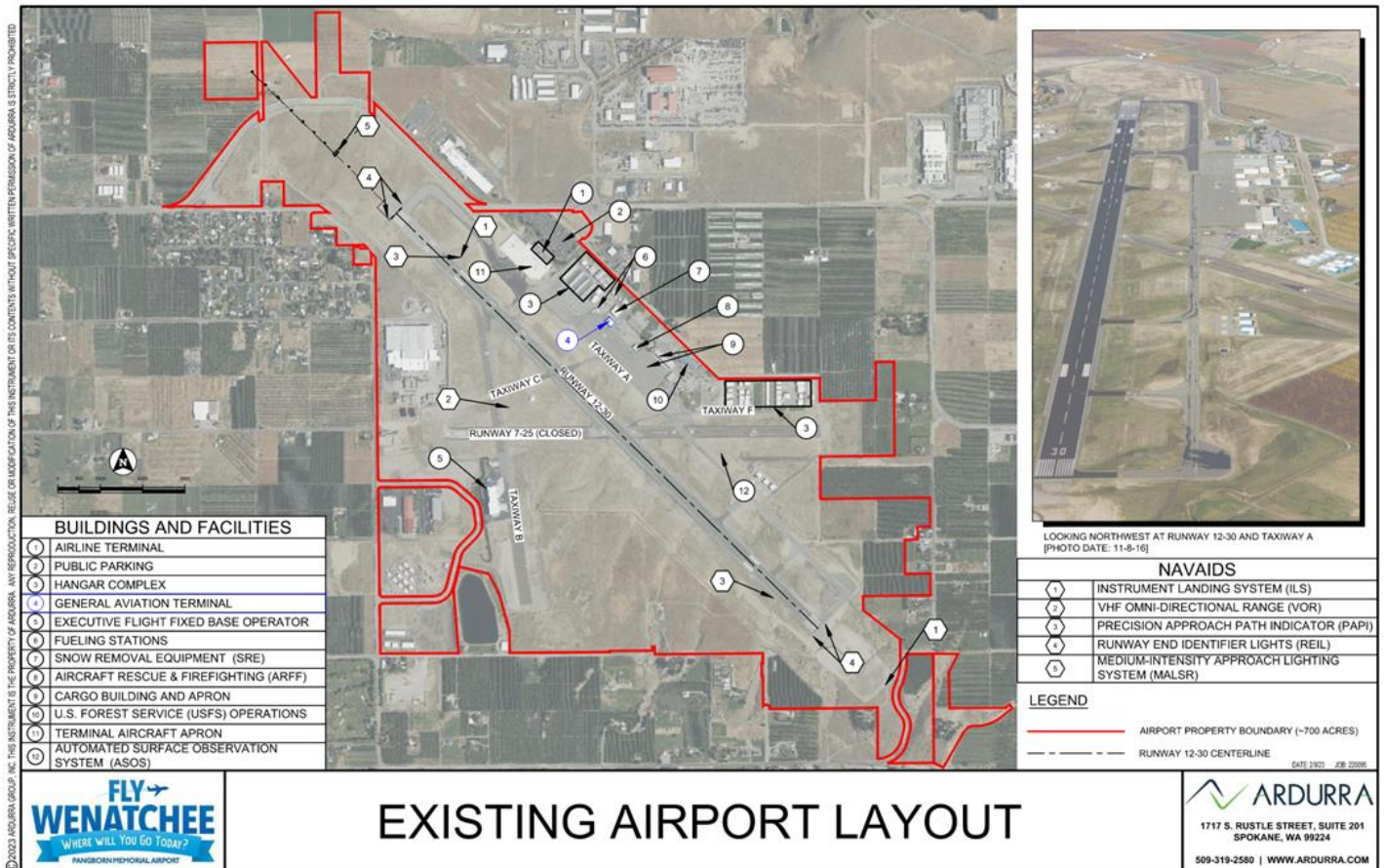


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FAA/DAHP CORRESPONDENCE

APRIL 7, 2021





April 7, 2021

Ms. Kate Key
Project Manager
Federal Aviation Administration

In future correspondence please refer to:
Project Tracking Code: 2019-10-07623
Property: Pangborn Memorial Airport Master Plan Improvements
Re: No Adverse Effect

Dear Ms. Key:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. Your communication on this action has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

First, we concur with the revised project area of potential effect (APE) as mapped in your documentation. We also concur that Site 45DO1299 is NOT ELIGIBLE for inclusion in the National Register of Historic Places (NRHP). We also concur that the following properties are ELIGIBLE for inclusion in the NRHP:

- Property ID: 721677 Pangborn Memorial Airport -- General Aviation Terminal
- Property ID: 721709 Pangborn Memorial Airport -- Very High Frequency Omnidirectional Range Facility
- Property ID: 722566 Pangborn Memorial Airport -- Beacon Tower

We also concur that the following properties are NOT ELIGIBLE for inclusion in the NRHP:

- Pangborn Memorial Airport Historic District
- Property ID: 721547 Single-Family Residence at 3780 Grant Rd, East Wenatchee, Washington, 98802
- Property ID: 721630 Single-Family Residence at 3290 1st St SE, East Wenatchee, Washington, 98802
- Property ID: 721631 Single-Family Residence at 22 S Union Ave, East Wenatchee, Washington, 98802
- Property ID: 721632 Orchard and Mobile Home at 302 S Union Ave, East Wenatchee, Washington, 98802
- Property ID: 721633 Single-Family Residence at 120 S Union Ave, East Wenatchee, Washington, 98802
- Property ID: 721634 Single-Family Residence at 58 S Union Ave, East Wenatchee, Washington, 98802



- Property ID: 721635 Washington, 98802 Single-Family Residence at 50 S Union Ave, East Wenatchee,
- Property ID: 721636 Washington, 98802 Single-Family Residence at 110 S Texas Ave, East Wenatchee,
- Property ID: 721637 Washington, 98802 Single-Family Residence at 39 S Union Ave, East Wenatchee,
- Property ID: 721638 Washington, 98802 Single-Family Residence at 6 S Roland Ave, East Wenatchee,
- Property ID: 721639 Washington, 98802 Single-Family Residence at 89 S Texas Ave, East Wenatchee,
- Property ID: 721640 Washington, 98802 Single-Family Residence at 3111 Airway St, East Wenatchee,
- Property ID: 721641 Washington, 98802 Single-Family Residence at 3110 S Airway Ave, East Wenatchee,
- Property ID: 721642 Washington, 98802 Single-Family Residence at 3116 S Airway Ave, East Wenatchee,
- Property ID: 721643 Washington, 98802 Single-Family Residence at 3250 4th St SE, East Wenatchee,
- Property ID: 721644 Washington, 98802 Single-Family Residence at 3250 2nd St SE, East Wenatchee,
- Property ID: 721645 Washington, 98802 Single-Family Residence at 3021 Airway St, East Wenatchee,
- Property ID: 721646 Washington, 98802 Single-Family Residence at 111 S Texas Ave, East Wenatchee,
- Property ID: 721647 Washington, 98802 Single-Family Residence at 141 S Texas Ave, East Wenatchee,
- Property ID: 721648 Washington, 98802 Single-Family Residence at 191 S Texas Ave, East Wenatchee,
- Property ID: 721649 Washington, 98802 Single-Family Residence at 6 S Stark Ave, East Wenatchee,
- Property ID: 721650 Washington, 98802 Single-Family Residence at 5 S Stark Ave, East Wenatchee,
- Property ID: 721651 Washington, 98802 Single-Family Residence at 20 S Stark Ave, East Wenatchee,
- Property ID: 721652 Washington, 98802 Single-Family Residence at 139 S Texas Ave, East Wenatchee,
- Property ID: 721683 Apron Pangborn Memorial Airport -- Runways, Taxiways, Taxi Lanes, and
- Property ID: 723033 Washington, 98802 Single-Family Residence at 305 N Stark Ave, East Wenatchee,

However, DAHP does not concur with your determination that no historic properties will be affected by the current project as proposed. Our agency views the overall undertaking does pose visual effects, at a minimum, to the above-listed historic properties located at Pangborn Memorial Airport. However, it is our opinion these effects are not adverse to the characteristics that qualify them for inclusion in the NRHP, and therefore no historic properties will be adversely affected by the project as proposed.

AS no properties will be adversely affected by this undertaking, further contact with DAHP on this proposal is not necessary. However, if new information about affected resources becomes available and/or the project scope of work changes significantly, please resume consultation as our



assessment may be revised. Also, if any archaeological resources are uncovered during construction, please halt work immediately in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,



Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov





FAA/DAHP CORRESPONDENCE

MARCH 23, 2021



U. S. Department
of Transportation

**Federal Aviation
Administration**

March 23, 2021

Dennis Wardlaw
Historic Preservation Review Officer
Washington State Department of Archaeological and Historic Preservation
1110 Capitol Way S, #30
Olympia, Washington 98504

Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602-1213

Subject: Determinations of Eligibility and Effect on Historic Properties due to Proposed Improvements at the Pangborn Memorial Airport at East Wenatchee, Washington

Dear Mr. Wardlaw:

The Federal Aviation Administration (FAA) is examining the environmental impacts regarding proposed improvements at the Pangborn Memorial Airport (Airport) at East Wenatchee, Washington. Project descriptions and layouts of two proposed projects (undertakings) are enclosed with this letter. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA has initiated preparation of environmental documents to meet its regulatory obligations and intends to complete Section 106 in conjunction with the NEPA process.

A Cultural Resource Survey (CRS) was initiated in early 2020 at the Airport following a 2019 update to the Airport Layout Plan. Its purpose was to identify potentially historic resources for use in determining environmental effects in an Environmental Assessment (EA). The scope of the CRS was to perform a reconnaissance archaeological study across the full extent of the Airport, complete an intensive-level survey where future development is likely to occur within the next five years, and document the results of the investigation to identify and evaluate above-ground cultural resources. The CRS report was completed in late 2020.

The APE described in the CRS is shown on Figure 2 in the CRS and spans the locations of eleven (11) original project components of an EA spread through the Airport property. Later, a number of residential properties near the Airport were added to the survey of above-ground resources. Although the APE for the current undertakings is more reduced than the APE evaluated in the CRS, no changes were made to the CRS in order to retain and record the information and sites that were already evaluated prior to the reduction of the scope for NEPA being limited to undertakings that are reasonably foreseeable.

No new archaeological sites within the survey area were identified as a result of the reconnaissance archaeological study across the full extent of the Airport or the intensive-level

surveys. Archeologists observed one basalt flake from a monitored geotechnical test pit excavation; however, it was considered an isolate, and therefore the CRS recommended it as not eligible for listing in the National Register of Historic Places (NRHP). The FAA agrees with this recommendation and has determined that the isolate (45DO01299) is **not eligible** to the NRHP.

As requested by DAHP during review of the draft CRS, the buildings, structures, and features of the Pangborn Memorial Airport were evaluated for NHRP eligibility as a Historic District, and the CRS recommended it as not eligible for listing as a Historic District. The FAA considered the information presented in the CRS and has reached the following conclusions regarding establishment of a Historic District:

- Although it appears to have been constructed in the 1940s (possibly as late as 1959), and the Airport's location and development was initially considered to support WWII military operations, it was not chosen for development for this purpose; nor does it appear to have any associations with other broad patterns of history. It appears as the Airport has operated as a routine civil aviation facility and has experienced associated development and growth throughout its history, and is not eligible to the NRHP under Criteria A.
- Although named after Clyde Pangborn (1894-1958), who was a celebrity aerial stuntman and barnstormer, the airport has no direct link to Clyde Pangborn or his career; nor any other person significant in the past which would make the airport eligible under Criteria B.
- The Airport does not embody the distinctive characteristics of a type, period, or method of construction that would make it eligible under Criteria C; nor is it likely to yield additional information to make it eligible under Criteria D. Most aspects of integrity have been lost due to development on and around the Airport property.
- As discussed in the CRS, the quality of significance in U.S. history, architecture, engineering, and culture for any given historic district is present when it meets at least one of the Criteria for listing in the NRHP; when at least 51% of its historical components possess integrity of design, workmanship, materials, feeling, location, setting, and association (i.e., are historical, contributing components); and when the historical, contributing components collectively convey the significance of the proposed district. As the Pangborn Memorial Airport does not meet these criteria for establishment as a Historic District, the FAA has determined that the ***Pangborn Memorial Airport is not eligible as a Historic District.***

Above-ground resources recorded in the CRS are shown on Figures 13, 14, and 15 of the attached CRS. Twenty-nine (29) individual Historic Property Inventory form (HPIs) were documented individually as part of this survey effort (Twenty-five residences and four (4) Airport features).

Detailed discussion of these twenty-nine resources is provided in the text of the CRS and on the HPI's included as Appendix D of the CRS. The FAA considered the recommendations made in the CRS and of the 29 individually recorded resources, the FAA has determined three (3) of these resources as eligible to the NHRP, and the remaining twenty-six (26) resources not eligible to the NHRP under any Criteria. The resources relevant to the current undertakings are described in detail below, and the residences that are included as part of the previous scope for the CRS are discussed in a table. The FAA has made a determination of eligibility as follows:

Newly recorded resources on the Pangborn Municipal Airport:

Pangborn Memorial Airport – Beacon Tower (Property #721566)

- The CRS recommends the Beacon Tower as eligible for listing in the NRHP under Criterion A and C; however the FAA has determined that the Beacon tower is *eligible* for listing in the NRHP under Criteria C only.
- The structure, built sometime between 1942 and 1948, is a lighted navigation aid, or beacon tower. Its design resembles a description of the early standard design of airway beacon towers.
- From information that is not in the CRS, but researched by the FAA, the Transcontinental Airway System was a series of domestic aviation routes established under the Air Mail Act of 1925 (Kelly Act) and its subsequent associated acts. The airway system consisted of lighted airway beacons and other navigational aids to facilitate navigation along designated flight corridors prior to the development of radio navigation. The light beacon system was steadily replaced by a more reliable radio beacon system along airways in the 1940s and 1950s.
- While the beacon tower resembles the early towers and their historic association with the Transcontinental Airway System, the beacon tower at Pangborn Memorial Airport was constructed at a later date, and is unlikely to be associated with these historical events, which would make it eligible to the NRHP under Criteria A. However, as noted in the CRS, the style of the architecture resembles and embodies the distinctive characteristics of this type and method of construction, which the FAA believes qualifies the beacon tower for the NRHP under Criteria C.

Pangborn Memorial Airport – General Aviation Terminal (Property #721677)

- The General Aviation Terminal is *eligible* for listing in the NRHP under Criterion C.
- The building was constructed in 1956 and remodeled in 1967. It is a vaulted hangar, with a single-story room centered on the east face and a one-story office across the southeast face (added circa 1966-1968).
- As the remodel and addition occurred historically, and no major changes have been made since, the building appears to have retained the integrity of its design, workmanship, materials, feeling, location, and association to the airport as a hangar that supports general aviation activities. The integrity of the setting remains intact.
- As the building possesses concrete block walls, a vaulted barrel roof, and an addition with T 1-11 siding and battens, the building also represents the distinctive characteristics of a period (1956 and 1966-1968).

Pangborn Memorial Airport – Very High Frequency Omnidirectional Range Facility (Property #721709)

- The Very High Frequency Omnidirectional Range Facility (VOR) is *eligible* for listing in the NRHP under Criterion A and C.
- The building was built circa 1960-1962 and has a rectangular plan; standing seam metal walls; no windows; two flush metal doors; and a flat metal roof with a circular plan and projecting eaves, the west half of which oversails the main entrance. Rising 10 ft from the center of the roof is a cone-shaped receiving unit with sheet metal cladding.
- The building has retained the integrity of its location, setting, design, workmanship, materials, feeling, and association to the Pangborn Memorial Airport.
- It represents the historical pattern of establishing air navigation assistance on the ground at U.S. airport facilities in the first decade following the invention of the VOR. The building embodies the distinctive characteristics of a type of shortrange radio navigation

system that allows aircraft to determine relative position and course by means of radio signals transmitted through a network of fixed ground radio beacons, specifically during the 1960s period.

Pangborn Memorial Airport – Runways, Taxiways, Taxi Lanes, and Apron (Property #721683)

- The network of pavements at Pangborn Memorial Airport are *not eligible* for listing in the NRHP under any Criteria.
- Pavements at the Airport include Runway 7/25 (now abandoned), Runway 12/30, Apron, Taxiway A, Taxiway B, Taxiway C, and Taxiway F,
- Most of the pavements were originally constructed between 1942 to 1959, 1964-1967, or later. Pavements have been extended, abandoned, renamed, or otherwise modified; and all have undergone routine maintenance and repairs.
- The Pangborn Memorial Airport network of pavements is not eligible for listing in the NRHP due to a loss of integrity. The cumulative effect of the series of late-twentieth century changes, not only to the runway/taxiway network itself, but to the surrounding associated buildings and site features, compromises the structure's integrity. With only integrity of location intact, it is not able to communicate its historic associations and is ineligible for NRHP listing.
- However, the FAA has noted one feature that was not addressed in the CRS that merits further evaluation if it may be affected in the future: A compass rose was painted on the original Runway 10/33 and is still present. This stretch of pavement is now utilized and is a part of Taxiway B. The compass rose should be individually evaluated in the future.

One residence that is located within the APE for one of the undertakings is at 305 N. Stark Avenue, which is discussed in detail below. The location of the residence is not shown in the CRS, and so is shown in a supplemental figure provided with the attached descriptions of the undertakings.

Residence at 305 North Stark Avenue (Property #723033)

- The residence at 305 North Stark Avenue is *not eligible* for listing in the NRHP under any Criteria.
- The loft barn and single-family residence were constructed in 1968, soon after the establishment of the Greater Wenatchee Irrigation District. The parcel is composed of 3.78 acres of apple orchards and 1.0 acre dedicated to the homesite.
 - The loft barn has a rectangular footprint measuring 44 x 48 ft. From the historic satellite photos and the Douglas County Assessors website, it appears that no modifications or additions have been made to the footprint of the barn. The barn door on the south side was open and showed that the interior had been heavily modified and is now in use as a shop for mechanical repairs.
 - The single-family residence has a low-pitch gable roof with a composition asphalt shingle material. The house has a rectangular shape with an attached garage with a low-pitch gabled roof of the same composition asphalt shingles and a covered patio on the east side of the house.
 - Aerial photographs available on Google Earth show the 3.78 acres of apple orchards were planted sometime between 1990 and 1997; therefore, the orchard on this property is not historic.
- Two additional buildings, a machine shed measuring 3,780 sq ft, and a utility building measuring 1,612 sq ft are also located on the homesite, but were built in 1992 and 1993, respectively.

- The buildings at 305 North Stark Avenue are not eligible to the NRHP under any criterion. They appear to have retained the integrity of location, setting, and association to the surrounding neighborhood and orchards; however, the integrity of the building designs, workmanship, materials, and feeling have been compromised because of modifications to the windows, doors, and entrance.

Table for the eligibility determinations of other residences included in the analysis in the CRS:

Property Number	Address	Construction Date	Eligibility Determination	Justification
721547	3780 Grant Road	1966	Not Eligible	Recommended in the CRS as eligible under Criteria C, but does not rise to level of significance for eligibility to the NRHP – see comment below*
721630	3290 1st Street	1966	Not Eligible	Not eligible under any Criteria; loss of integrity
721631	22 South Union Avenue	1970	Not Eligible	Not eligible under any Criteria; loss of integrity
721632	302 South Union Avenue	1970 (Orchard)	Not Eligible	Not eligible under any Criteria; loss of integrity
721633	120 South Union Avenue	1958	Not Eligible	Not eligible under any Criteria; loss of integrity
721634	58 South Union Avenue	1946	Not Eligible	Not eligible under any Criteria; retains integrity, but does not embody distinctive characteristics
721635	50 South Union Avenue	1954	Not Eligible	Not eligible under any Criteria; loss of integrity
721636	110 South Texas Avenue	1962	Not Eligible	Not eligible under any Criteria; loss of integrity
721637	39 South Union Avenue	1964	Not Eligible	Not eligible under any Criteria; loss of integrity
721638	6 South Roland Court	Modern - Manufactured	Not Eligible	Not historic; originally thought to have been built during historic era
721639	89 South Texas Avenue	1955	Not Eligible	Not eligible under any Criteria; loss of integrity
721640	3111 Airway Street Southeast	1959	Not Eligible	Not eligible under any Criteria; loss of integrity
721641	3110 Airway Street Southeast	1953	Not Eligible	Not eligible under any Criteria; loss of integrity
721642	3116 Airway Street	1960	Not Eligible	Not eligible under any Criteria; loss of integrity
721643	3250 4th Street Southeast	1966	Not Eligible	Not eligible under any Criteria; retains integrity, but does not embody

				distinctive characteristics
721644	3250 2nd Street Southeast	1964	Not Eligible	Not eligible under any Criteria; loss of integrity
721645	3021 Airway Street	1942	Not Eligible	Not eligible under any Criteria; loss of integrity
721646	111 South Texas Avenue	1952	Not Eligible	Not eligible under any Criteria; loss of integrity
721647	141 South Texas Avenue	1971	Not Eligible	Not eligible under any Criteria; loss of integrity
721648	191 South Texas Avenue	1961	Not Eligible	Not eligible under any Criteria; loss of integrity
721649	6 South Stark Avenue	1948	Not Eligible	Not eligible under any Criteria; loss of integrity
721650	5 South Stark Avenue	1957	Not Eligible	Not eligible under any Criteria; loss of integrity
721651	20 South Stark Avenue	1970	Not Eligible	Not eligible under any Criteria; loss of integrity
721652	139 South Texas Avenue	1965	Not Eligible	Not eligible under any Criteria; loss of integrity

*Comment: Although the CRS recommends the residence at 3780 Grant Road as eligible to the NRHP under Criteria C, the FAA does not agree that the residence rises to the level of significance to be eligible to the NRHP under any criteria. Although it does embody the distinctive characteristics of the split-level ranch, it does not represent the work of a master or possess high artistic value. The structure is not associated with specific events associated with broad patterns of history, nor is it associated with any person significant in history, which would make it eligible under Criteria A and B. And, is not likely to yield information under Criteria D.

The FAA coordinated the original APE and invited the Confederated Tribes of the Colville Reservation, Confederated Tribes and Bands of the Yakama Nation, and the Spokane Tribe to provide information to CRS that the FAA should consider and to participate in government-to-government consultation for the undertakings. After being contacted and forwarded a copy of the CRS, a response was received from the Confederated Tribes of the Colville Reservation, stating that they concurred with a finding of no adverse effects to archaeological properties and objects, and that they envision a robust Discovery Plan. No other responses have been received to date.

In addition to the determinations of eligibility of resources to the NRHP, the FAA has also considered the effects of the proposed undertakings on historic resources.

The scope of the CRS was intended to provide an assessment for a Proposed Action of an EA, which originally included the following Project Components: East Parking Overflow (1#), Non-Aeronautical Building Pads (2#), Airline/Employee Auto Parking (3#), Airline Aircraft Apron Improvements & Glycol Collection (4#), Airline Passenger Terminal Expansion (5#), Relocate Taxiway A & Site Grading (6#), Terminal Parking Expansion and Reconfiguration (7#), Runway 12 RPZ Acquisition and MALSR Installation (8#), Executive Hangars Site Development (9#), Runway 12/30 Pavement Reconstruction and Blast Pad (10#), and Airport Operations Building (11#).

Of the eleven original Project Components, two undertakings (Proposed Projects #1 and #2) have been developed that are reasonably foreseeable actions for which Section 106 is being initiated with this letter. Proposed Project #1 corresponds to the original Project Component #08 with associated APE on Figure 2 of the CRS; and Proposed Project #2 corresponds to Project Components #04, #06, and #10 with the associated APEs shown on Figure 2 of the CRS. The other Project Components will be subject to NEPA when they are justified and reasonably foreseeable.

The following are brief descriptions of the Proposed Projects (undertakings) and the FAA determination of effect. Detailed descriptions and layouts of the Proposed Projects are provided in attached documents.

Proposed Project #1: Runway 12 RPZ Land Acquisition and MALS Installation

- Proposed Project #1 will acquire approximately 29 acres of land to control the area in the Runway Protection Zone (RPZ) Runway 12 End and install a Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights (MALS).
- Structures associated with the property at 305 North Stark Avenue will be removed or demolished. The FAA has determined that the structures at 305 North Stark Avenue are not eligible to the NRHP.
- No known archaeological or historical resources are known that will be affected by the implementation of Proposed Project #1.
- The FAA has made a determination of *No Historic Properties Affected* for Proposed Project #1. The FAA will develop a Discovery of Unanticipated Resources Plan for implementation during construction, as requested by the Confederated Tribes of the Colville Reservation.

Proposed Project #2: Runway, Taxiway, and Apron Improvements

- Proposed Project #2 will reconstruct and grade the Airline Aircraft Apron, Taxiway A, and Runway 12-30 to meet FAA design standards and correct non-standard grade issues. To accomplish this, Taxiway A will be relocated to a distance of 400' from Runway 12-30 and all pavements will be reconstructed on appropriate grades.
- Proposed Project #2 contains the following three Project Components:
 - #1: Airline Aircraft Apron Improvements & Glycol Collection
 - #2: Relocate Taxiway A and Site Improvements
 - #3: Runway 12-30 Pavement Reconstruction and Blast Pad
- No archaeological or historic resources have been identified within the APE for Proposed Project #2, and the area has been heavily disturbed by construction activity for the Airport. None of the features eligible for the NRHP (Beacon Tower, General Aviation Terminal, or VOR) will be affected by the project, nor will the unrecorded compass rose that is painted on Taxiway B.
- The FAA has made a determination of *No Historic Properties Affected* for the construction of Proposed Project #2. The FAA will develop a Discovery of Unanticipated Resources Plan for implementation during construction, as requested by the Confederated Tribes of the Colville Reservation.

Please review these findings and the enclosed documentation and provide either your concurrence or non-concurrence on these determinations. You can provide your response, comments, or recommendations to me at diane.stilson@faa.gov or send them to me at the following address:

Diane Stilson, P.E.
FAA Helena Airport District Office
2725 Skyway Drive, Suite 2
Helena, Montana 59602-1213

I can also be reached by phone at (406) 441-5411.

Thank you in advance for any comments or information you have to offer.

Sincerely,

DIANE
STILSON

A digital signature stamp with a red scribble over the text. The text reads: "Digitally signed by DIANE STILSON Date: 2021.03.23 08:26:01 -06'00'".

Digitally signed by
DIANE STILSON
Date: 2021.03.23
08:26:01 -06'00'

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist

Enclosures:

Project Descriptions and Project Layouts
Cultural Resource Survey for the Pangborn Memorial Airport Capital Improvement
Program 2020-2025, East Wenatchee, Washington (October 2020)

cc: (Via e-mail)

Chelan-Douglas Regional Port Authority
T-O Engineers
file

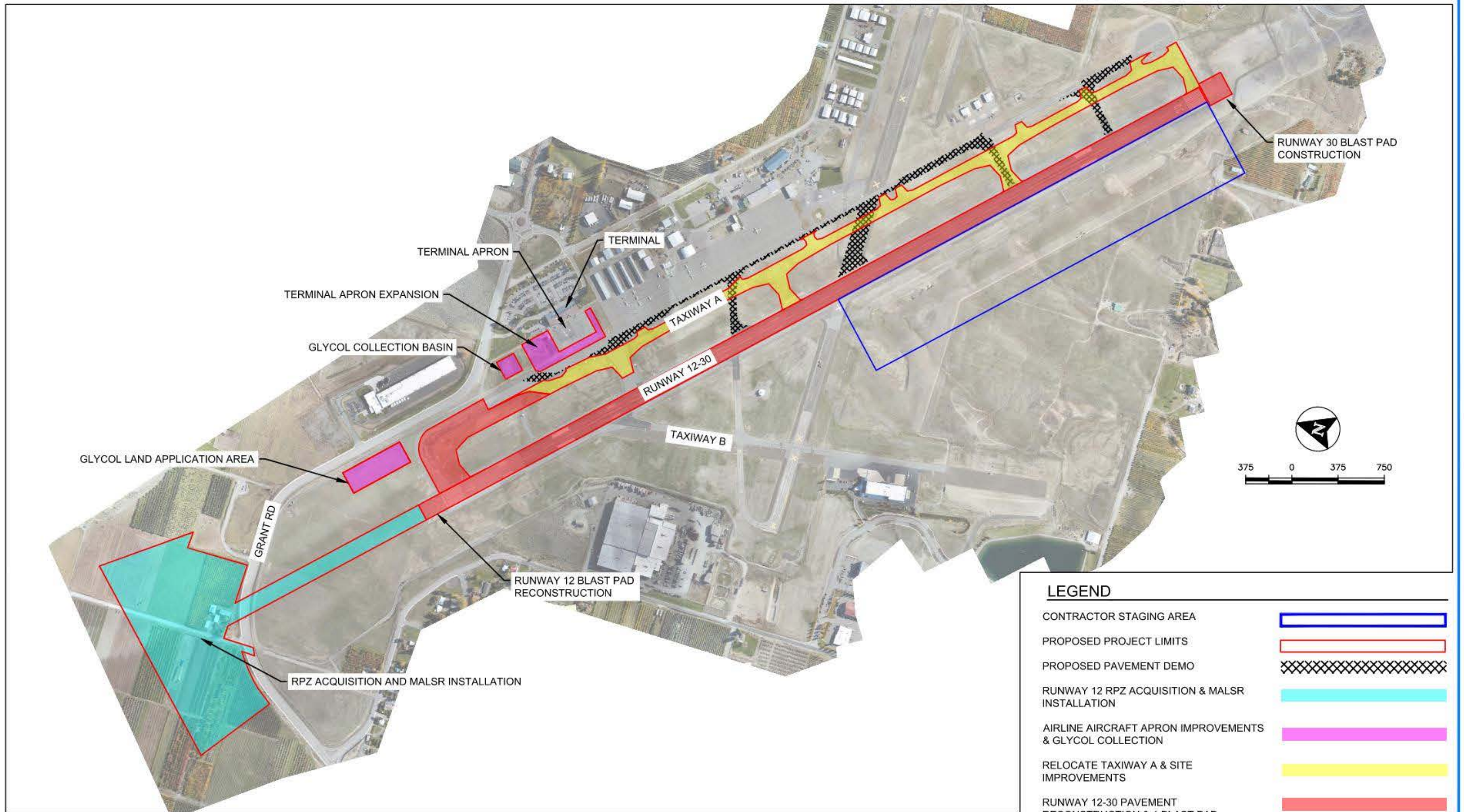
Project Descriptions for Improvements to the Pangborn Memorial Airport:

The Chelan-Douglas Regional Port Authority, the Airport Sponsor, has proposed improvements to the Pangborn Memorial Airport in East Wenatchee, Washington. The FAA will review environmental documents to meet regulatory obligations under NEPA for the proposed projects.

It is anticipated that two (unrelated) projects will be analyzed under NEPA:

- Proposed Project #1 for **Runway 12 RPZ Land Acquisition and MALSR Installation** will be addressed in an Environmental Assessment (EA).
- Proposed Project #2 for **Runway, Taxiway, and Apron Improvements** will be addressed under a Categorical Exclusion (CAT-EX).

The Proposed Projects are shown in **Figure 1, Proposed Improvements Exhibit** (dated 1/29/21) and described in the following pages.



NOTE: AERIAL PHOTO BY T-O ENGINEERS OCTOBER 2019



FIGURE 1: PROPOSED PANGBORN MEMORIAL AIRPORT IMPROVEMENTS



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Proposed Project #1:

Runway 12 RPZ Acquisition & MALSR Installation

Proposed Project #1 will acquire land to control the area in the Runway Protection Zone (RPZ) Runway 12 End and install a Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR).

To control the future Runway 12 approach RPZ, the Proposed Project must gain control of approximately 29 acres of land. Six (6) individual parcels (totaling 28.29 acres) have been identified for fee simple purchase by the Sponsor; the remaining land is Douglas County right-of-way (0.56 acres) and will be controlled through an aviation easement. All six of the private parcels are presently used for agricultural land uses, but only one parcel contains existing structures (shown within Parcel #3 on **Figure 2, Runway 12 RPZ Acquisition and MALSR Installation**). It is assumed that all of the existing structures on Parcel # 3 will be demolished or removed to construct the MALSR. There may be an opportunity to lease some land back through short term leases at the Airport's discretion, allowing some agricultural uses as long as there is no conflict in operation (e.g. wildlife attractants). The future Runway 12 RPZ will be in effect after the MALSR is installed.

The installation of a MALSR system includes Runway Alignment Indicator Lights placed 200' beyond the threshold of the runway and 12 subsequent light structures placed every 200' (+/- 20'), as shown in **Figure 2**. Installation of this Project Component will ultimately allow for a reduction in approach visibility minimums, driving the increased design standard for the RPZ. Related construction activities include overhead powerline removal.

This project is planned to move forward at the conclusion of the NEPA process in 2021/2022.

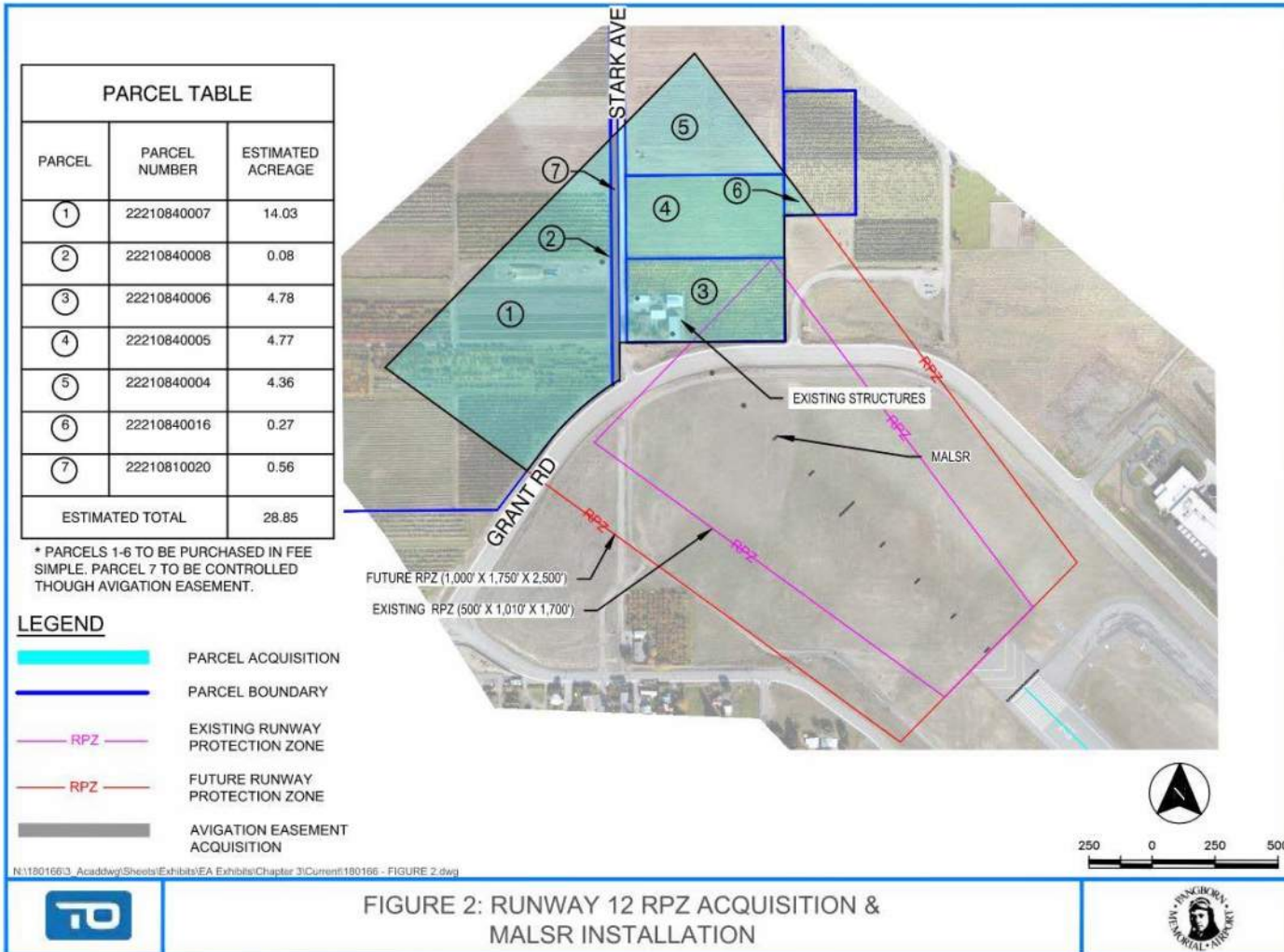


Figure 2: Runway 12 RPZ Acquisition & MALSR Installation, adapted from 2021 Draft EA (dated 1/29/21)

305 N Stark Avenue



(Modified) Figure 13. Historical elements recorded at the Pangborn Memorial Airport.

Proposed Project #2:
Runway, Taxiway, and Apron Improvements

Proposed Project # 2 contains the following 3 Project Components:

- #1: Airline Aircraft Apron Improvements & Glycol Collection
- #2: Relocate Taxiway A and Site Improvements
- #3: Runway 12-30 Pavement Reconstruction and Blast Pad

Proposed Project #2 will reconstruct and grade the Airline Aircraft Apron, Taxiway A, and Runway 12-30 to meet FAA design standards and correct non-standard grade issues. To accomplish this, Taxiway A will be relocated to a distance of 400' from Runway 12-30 and all pavements will be reconstructed on appropriate grades.

An FAA Modification to Standards (MOS) is currently utilized at the Airport due to a runway-to-taxiway elevation differential (the runway is currently below the parallel taxiway elevation). The proposed Project Components will address this deficiency while reconstructing pavements to improve strength and address deteriorating condition. Concurrent design of all three Project Components will ensure that grades between aprons, taxiways, the existing Runway 12 end blast pad, the proposed Runway 30 end blast pad, and Runway 12-30 align and meet FAA design standards.

In addition to the pavement reconstruction, the airline aircraft apron will be expanded, a glycol collection basin and associated conveyance will be installed for aircraft de-icing, and one 200' x 200' blast pad will be added to the Runway 30 end.

The work is expected to be accomplished in multiple phases beginning with Project Component #1 in 2021, Project Component #2 in 2022, and Project Component #3 in 2025.

The Project Components are individually discussed further in the subsequent pages.

Proposed Project #2: Runway, Taxiway and Apron Improvements

Project Component #1:

Airline Aircraft Apron Improvements & Glycol Collection

Project Component #1 under Proposed Project #2 will expand and reconstruct the existing airline aircraft terminal apron and install a commercial aircraft glycol collection system as shown in **Figure 3, Airline Aircraft Apron Improvements & Glycol Collection**.

Under this proposed Project Component, the existing airline aircraft apron will be extended to the northwest, increasing the overall area from 87,300 to 162,000 square feet. This expansion will accommodate two Airplane Design Group (ADG)-III parking positions and one ADG-III deicing bay. A glycol collection basin will be installed northwest of the extended airline aircraft apron.

During deicing operations on the designated deicing pad, glycol will be collected in a trench drain system and piped to the glycol collection basin. After allowing solids from the glycol to settle out in the collection basin, the remaining fluid will be discharged to the on-site land application system within the Runway 12 End RPZ.

This Project Component also includes taxiway edge light removal and installation, stormwater improvements, pavement markings, clearing and grubbing, grading, apron light installation, installation of a glycol recovery system, and removal/replacement of pavement as needed to accommodate the improvements.

Construction is planned to occur in 2021.

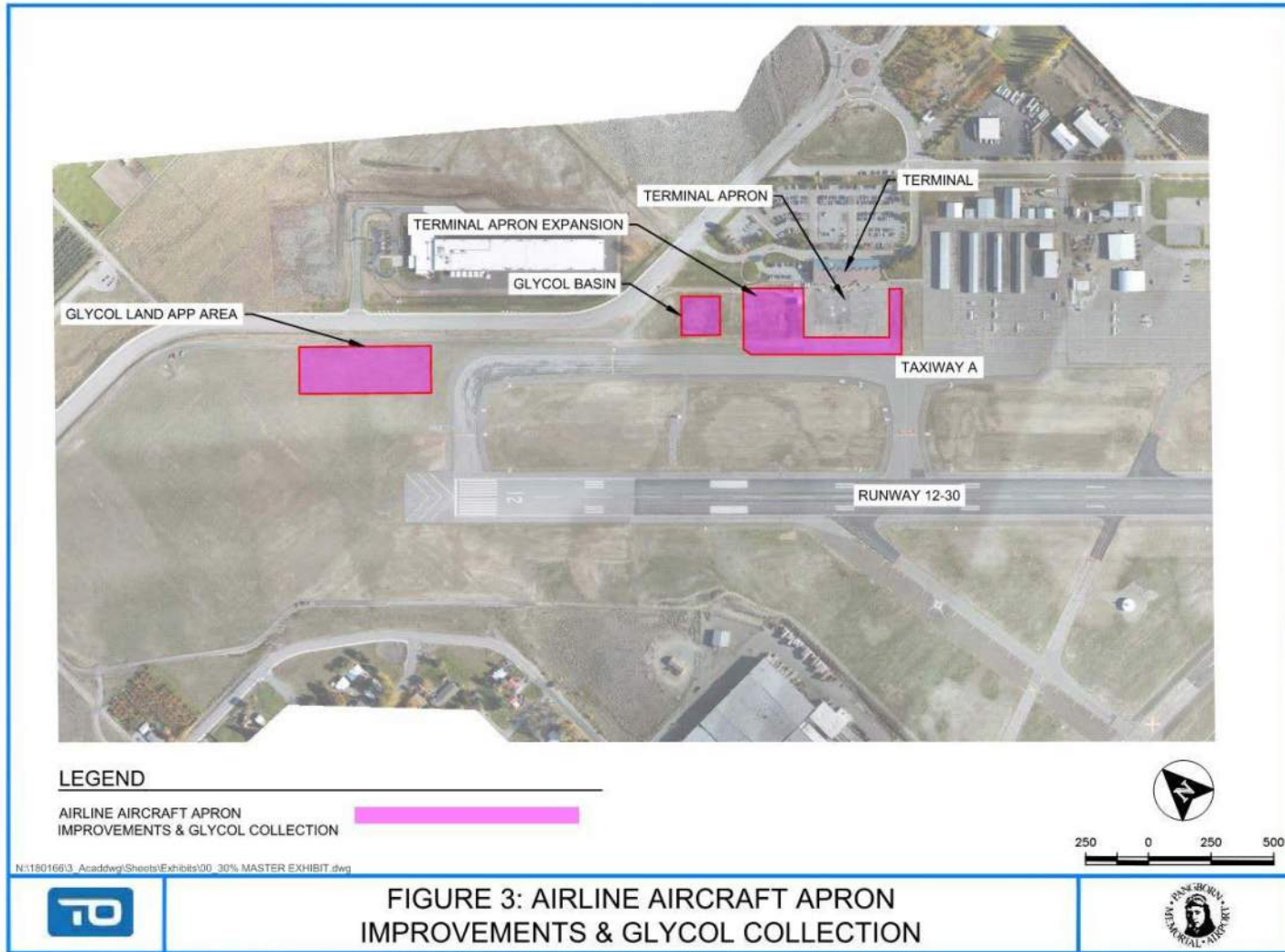


FIGURE 3: AIRLINE AIRCRAFT APRON IMPROVEMENTS & GLYCOL COLLECTION

Figure 3: Airline Aircraft Apron Improvements & Glycol Collection, adapted from Proposed Improvements Exhibit, (dated 1/29/21)

Proposed Project #2: Runway, Taxiway, and Apron Improvements

Project Component #2:

Relocate Taxiway A and Site Improvements

Project Component #2 under Proposed Project #2 will relocate and reconstruct Taxiway A (except for the northern section, which is included in Project Component #3), as shown in **Figure 4, Relocate Taxiway A and Site Improvements**. This will bring Taxiway A closer to the runway and meet pavement strength and dimensional standards specified for the current (Bombardier Q400) and future (Embraer EMB-175) critical aircraft.

Taxiway A will be relocated to bring runway-to-taxiway centerline separation to 400'. This will increase the separation between Taxiway A and the aprons and hangars, improving safety and maneuverability and decreasing apron congestion. The site will be graded so the new pavements align with the apron from Project Component #1 and the Runway 12-30 reconstruction in Project Component #3, both in Proposed Project #2. Taxiway A will be reconstructed to meet FAA design standards for ADG III and Taxiway Design Group (TDG) 5.

This Project Component also includes the installation of taxiway lighting along the relocated Taxiway A and connecting taxiways, relocation of NAVAIDs, pavement markings, topsoil and seeding, signage, and removal of pavement as needed to accommodate the improvements. Stormwater improvements will be completed in conjunction with the installation of the new pavements.

Construction is planned to occur in 2022.

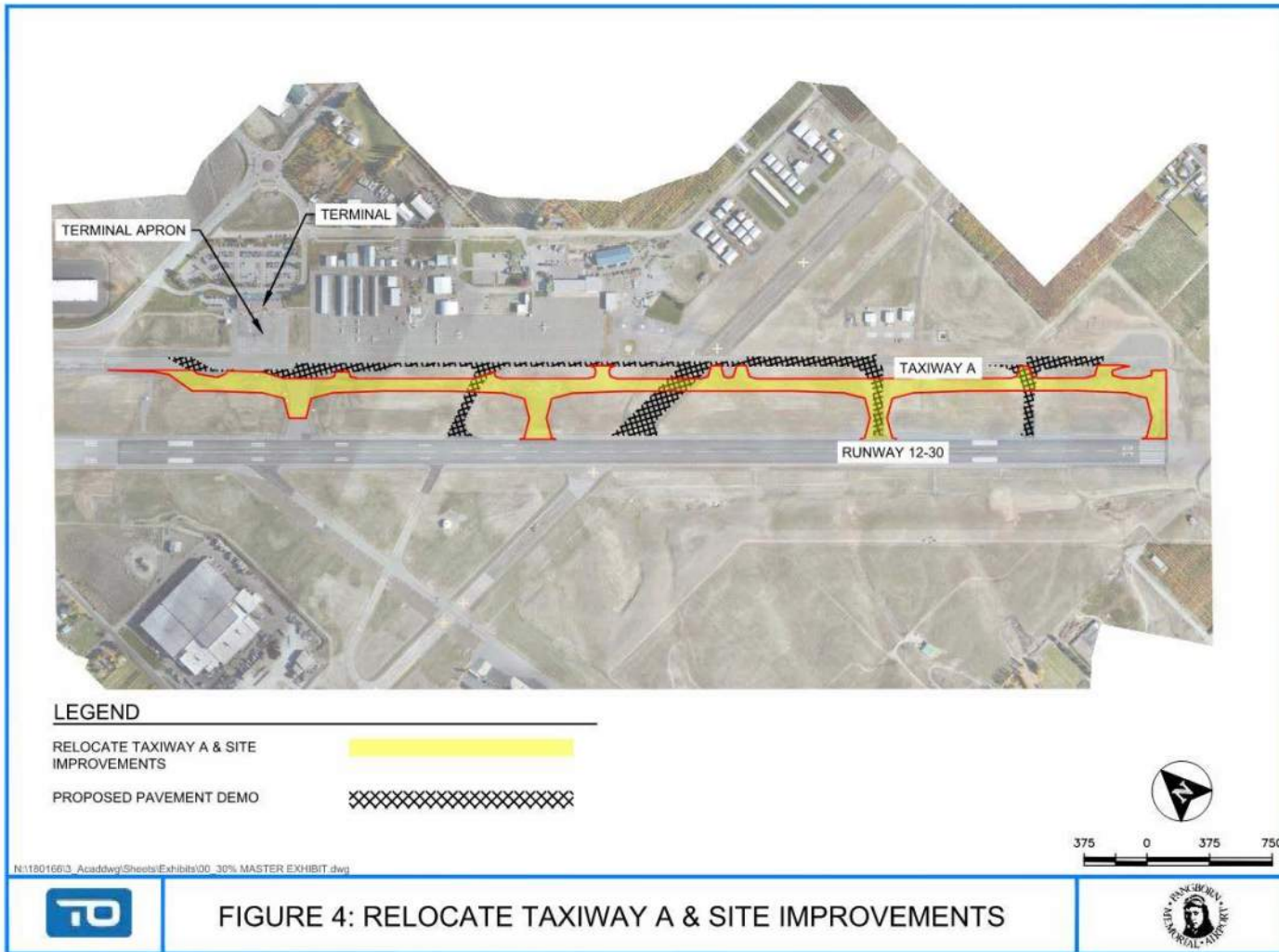


Figure 4: Relocate Taxiway A and Site Improvements, adapted from Proposed Improvements Exhibit, (dated 1/29/21)

Proposed Project #2: Runway, Taxiway, and Apron Improvements

Project Component #3:

Runway 12-30 Pavement Reconstruction and Blast Pad

Project Component #3 under Proposed Project #2 will reconstruct the entire length of Runway 12-30 to comply with design standards. The reconstruction and relocation of the northern section of Taxiway A is also included in this phase. The project footprint is shown in **Figure 5, Runway 12-30 Reconstruction and Blast Pad**.

This Project Component proposes to raise the elevation of the runway to meet the FAA standards and guidelines, correcting the non-standard placement of the runway below the parallel taxiway elevation. The reconstructed Runway 12-30 will also meet the future critical aircraft pavement strength requirements of 150,000 pounds Dual Wheel Gear (DWG) and have 25' shoulders along the length of the runway. As part of the effort to correct runway design deficiencies, a normal crown will be implemented in Runway 12-30. This change will subsequently require the existing Runway 12 end blast pad to be reconstructed to match the Runway 12-30. Additionally, a 200' x 200' blast pad will be constructed off the Runway 30 end.

This Project Component also includes utility relocation, edge lighting, pavement markings, topsoil and seeding, and signage. Stormwater improvements will be completed in conjunction with the installation of the new pavements.

Construction is planned to occur in 2025.

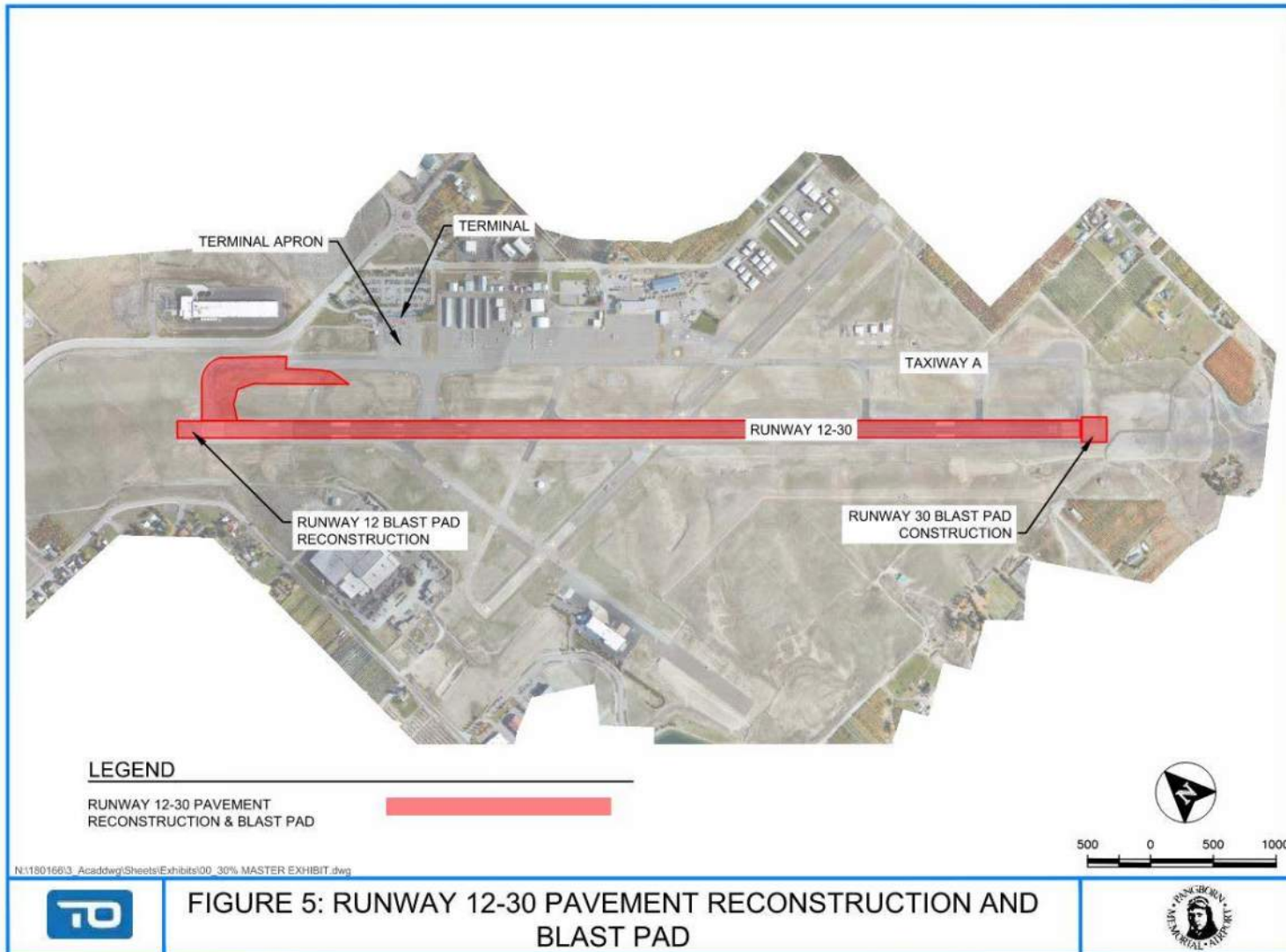


Figure 5: Runway 12-30 Reconstruction and Blast Pad, adapted from Proposed Improvements Exhibit, (dated 1/29/21)