

**FINAL  
ENVIRONMENTAL  
ASSESSMENT  
and  
FINDING OF NO  
SIGNIFICANT IMPACT**

OCTOBER 2012

for the  
**Initiation of Turbojet Service**  
for  
**Friedman Memorial Airport**  
Hailey, Idaho

This environmental document becomes a federal document when  
evaluated, signed and dated by the Responsible FAA Official.

*Norman Lefevre*  
Responsible FAA Official

*10/22/12*  
Date



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Prepared for:

**U.S. Department of Transportation**

**Federal Aviation Administration**

Prepared by





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# CHAPTER 1

## INTRODUCTION AND BACKGROUND

### 1.1 PROPOSED ACTION

SkyWest currently services Friedman Memorial Airport (FMA) as Delta Connection, with an Embraer EMB 120ER Brasilia (a 30-passenger turboprop). SkyWest proposes to replace this service with a Bombardier CRJ700ER, (a twin-engine jet aircraft with 65 passenger seats). The Letter of Intent (LOI) from SkyWest stating this proposal is provided in Appendix A. In order to do this, SkyWest has made a request to the Federal Aviation Administration (FAA) to amend the Airline's Operations Specifications (proposed action) at FMA. SkyWest has indicated that it would reduce the frequency of service from a high-season peak of 12 daily operations with the EMB-120 to 6 daily operations with its 65-seat CRJ700ER.

The CRJ700ER is a Category C aircraft whereas FMA is a Category B airport. Effectively, this means that there is not enough Runway Safety Area (RSA) at FMA for the CRJ700ER to safely operate as per FAA regulations. Therefore, this proposal also involves the additional agreement between FMA and the Air Traffic Control Tower (ATCT) to ensure that the taxiways on either side of the runway at FMA be free of any traffic, effectively providing sufficient RSA for a Category C aircraft.

No physical improvements would be necessary to accommodate this change in aircraft type, so the proposed action is limited to the amendment of the Airline's Operations Specification. This Environmental Assessment has been prepared to comply with the requirements of the National Environmental Policy Act (NEPA) for the associated federal actions, as well as FAA Order 1050.1E, Change, 1, *Environmental Impacts: Policies and Procedures*, among other federal, state and local laws and regulations.

### 1.2 HISTORY AND BACKGROUND OF THE PROPOSED ACTION

FMA is located in South Central Idaho and serves the Wood River region (see **Figure 1-1**). The valley has five incorporated cities: Bellevue, Hailey (county seat of Blaine County), Ketchum, Carey and Sun Valley. FMA is located in the City of Hailey, the fastest growing city in the Wood River Valley. According to the 2010 census, the City of Hailey had a population of 7,960, the City of Bellevue 2,287, and Blaine County 21,326. At an elevation of 5,317 feet the airport is nestled within the Idaho Rockies and is at the edge of the Sawtooth and Challis National Forests. The area is well known for the Sun Valley resort.

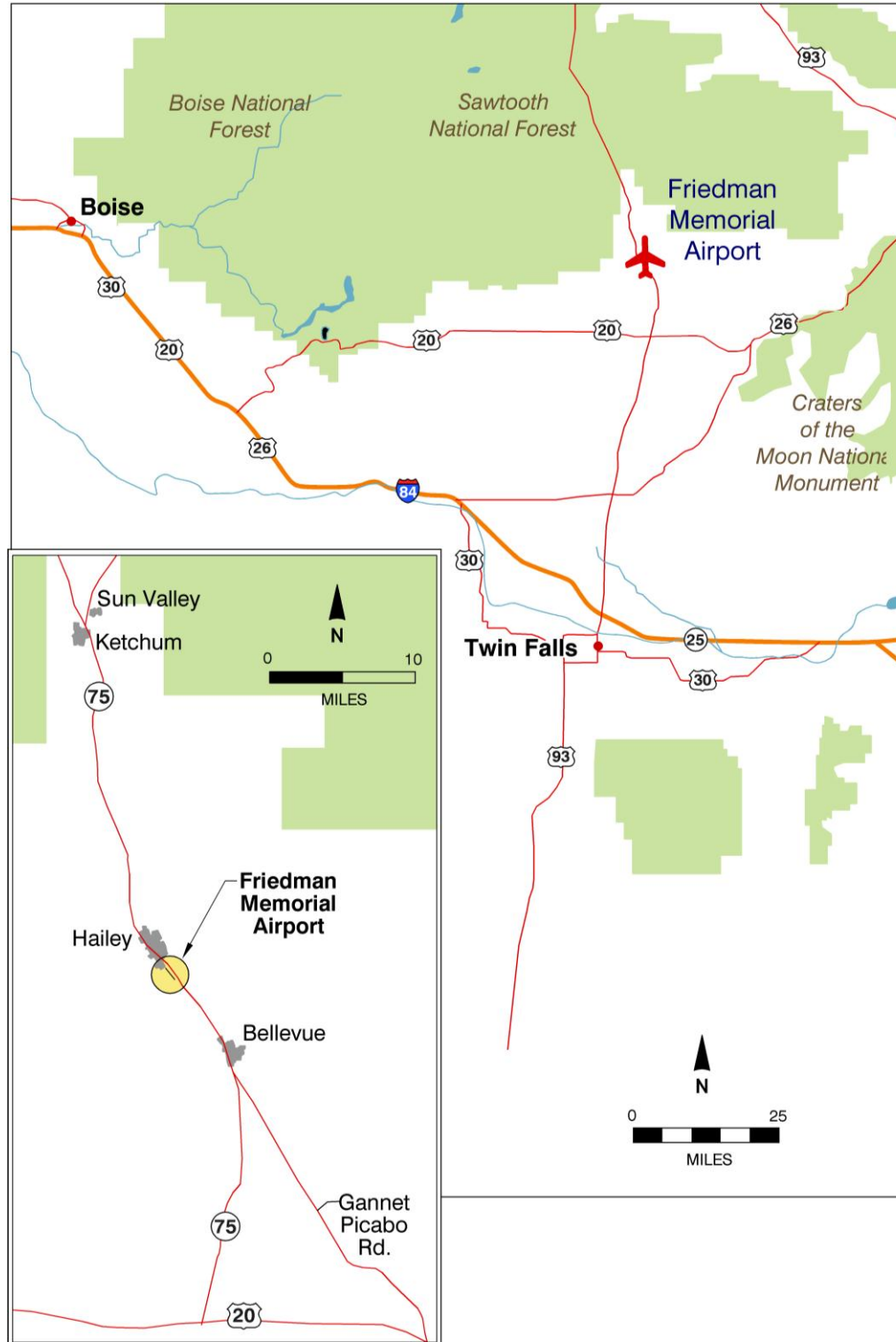


FIGURE 1-1  
LOCATION MAP

The Airport is located within the City of Hailey and encompasses 209 acres of land. North and east of the Airport is a mixture of residential and commercial uses. McKercher City Park and Hailey Cemetery are located immediately north of FMA. Non-residential development is located to the immediate northwest and includes a church located at the intersection of State Highway 75 and Airport Way, and other commercial/industrial development near Airport Way and Aviation Drive. Further to the northwest is the historical center of Hailey which has a mixture of commercial and residential uses. To the west of FMA, there is a mixture of industrial and lower density residentially-designated areas which currently have limited development. Residential land uses are located southeast of the Airport and land uses are predominantly agricultural and open/undeveloped land with a few scattered residences along Broadford Road. A small residential area is located to the southwest along Broadford Highlands Way. The Big Wood River, which flows north to south through the valley, is located approximately 4,000 feet west of the existing Airport. The city of Bellevue is located approximately two miles to the southeast, with the Chantelle subdivision being the closest residential land use within that jurisdiction. Land use is depicted in **Figure 4-1** in Chapter 4.

FMA is a Code of Federal Regulations (CFR) Part 139 B-II Certificated airport. Given the geographical location of FMA, FMA currently does not and cannot comply with FAA airfield design standards on the limited land owned by the Airport. For example, the horizontal distance between the airport parallel taxiway and the runway is at 250 feet rather than the required 400 feet per FAA design standard. In order to meet FAA design standards for the type of commercial and general aviation aircraft that routinely use the Airport, an agreement between the FMA and the ATCA has been put into place which constrains aircraft taxi movements when aircraft such as the Horizon Airlines Dash 8-400 flies into Friedman Memorial. Such an agreement has been extended to include SkyWest CRJ700 ER aircraft. Furthermore, the FAA required Runway Safety Area and Runway Object Free Areas do not meet standards because of the close proximity of the runway to State Highway 75. Because of the Runway Safety Area length deficiency a portion of the north end of the runway is not available for use for aircraft takeoffs and landings as it has been designated as part of the Runway Safety Area. The mountainous terrain on the east, west, and north sides of the Airport precludes instrument approach procedures such as exist at most commercial airports. Based on historic data approximately 25 percent of scheduled airline flights during winter months are either cancelled or diverted to another airport.

In the 1985 FMA Airport Master Plan, options for the alteration of the FMA layout was discussed, including the relocation of State Highway 75. However, the cost and difficulty associated with this type of movement in developing the Airport to correct FAA discrepancies were considered extreme. In 1990, an Airport Feasibility Study was drafted in order to identify and compare the improvements necessary to modify the current airport site's deviations to FAA standards versus construction of a new airport at a different location in the Wood River Region. The final site choice was located in western Blaine County near the Camas County line. The residents of Blaine County and the Blaine County Airport Commissioners were the final authority on deciding the action to take preceding this study. They concluded that staying with the current airport site was the best decision at the time.

The next study was published in 1994. This 1994 Airport Master Plan Update recognized that growth at the existing Airport would eventually require relocating the entire airport away from its present site and

the valley. As a result of ARC C-III aircraft replacing the existing Airport's (B-III) design/critical aircraft and the FAA's requirements for appropriate airfield design criteria (i.e. safety area dimensions).

The 2004 Master Plan Update was undertaken to examine alternatives to rectify the Airport's deviations from FAA design standards. Factors under consideration in this study included identifying improvements needed for existing airport facilities, evaluating alternative development options in order to meet required standards, as well as developments necessary to meet long-range (20-year) airport requirements based on the projected increase in future airport operations. The 2004 Master Plan Update explored both short-term and long-term alternatives. The Airport Authority opted to begin with the required short-term improvements, but due to the combination of high costs, negative community reaction to required land acquisition, and lack of resolution for long-term airport growth requirements, the Authority also approved a study for investigating alternate airport locations and selecting a new airport site.

The 2006 Feasibility Study was conducted as a result of the findings and conclusions reached by the 2004 FMA Master Plan Update. The goal of the study was to identify alternate airport site locations away from the existing airport, select a preferred site from these locations, and conduct a financial feasibility analysis for the new airport. Following this study, the FAA initiated an Environmental Impact Statement (EIS) to investigate the impacts of the FMA's replacement airport. It was intended that the EIS would determine all impacts to the environment, such as, but not limited to, noise, air quality, water quality, wetlands, fish, wildlife, plants, farmlands, floodplains, historic/tribal resources, hazardous wastes, socioeconomics, and economic factors.

During the EIS process, issues related to wildlife matters arose and the costs associated with the alternative sites for the replacement airport increased beyond what was expected. This raised feasibility concerns for the project's advancement. The FAA indefinitely suspended the Draft EIS in August 2011. Currently, the status of the EIS remains suspended.

# CHAPTER 2

## PURPOSE AND NEED

### 2.1 PURPOSE OF THE PROPOSED ACTION

The purpose of the Proposed Action is to replace the current SkyWest Airlines' scheduled passenger service to FMA that currently uses the Embraer EMB 120ER Brasilia with the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats. This EA is intended to support FAA's review of the Airline's proposed amendment of its Operations Specifications.

### 2.2 NEED FOR THE PROPOSED ACTION

The need for the proposed actions is to meet the Airline's desire to phase out service by the Brasilia while introducing service using the CRJ700ER at FMA.

**Operations Specifications Amendment.** FAA's "continuing mission is to provide the safest, most efficient aerospace system in the world." A central means of implementing this mission is through issuance of Operations Specifications to scheduled airlines as defined in Title 14 CFR Section 119.49. SkyWest has requested amendments to its Operating Specifications to permit introduction of scheduled passenger service using the CRJ700ER to replace the Brasilia. The FAA must review amendments to operations specifications and is required to either grant or deny the amendment to the operations specifications based on a number of criteria. Air commerce safety is the primary consideration in determining the issuance of the specifications. As stated in 49 USC Section 44705:

"The Administrator of the Federal Aviation Administration *shall* issue an air carrier operating certificate to a person desiring to operate as an air carrier when the Administrator finds, after investigation, that the person properly and adequately is equipped and able to operate safely under this part and regulations and standards prescribed under this part. An air carrier operating certificate shall (1) contain terms necessary to ensure safety in air transportation; and (2) specify the places to and from which, and the airways of the United States over which, a person may operate as an air carrier." (*Emphasis added*)

Therefore, the FAA needs to evaluate the requested change to operations specifications to determine that safety in air commerce will allow the amendment of those specifications, pursuant to 14 CFR Section 119.51 and 14 CFR Section 121, and FAA Order 9800.1 Volume 3, Chapter 18, Section 5, Paragraph 3-871.

The amendment will identify the aircraft to be used, the operations authorized and any limitations, deviations or exemptions. The FAA will review the change to ensure that the proposed operating procedures meet the agency's safety standards. As stated in the Background Chapter, because the Airport already has a Class I Part 139 Airport Certification, no changes to the Part 139 certification would be needed in association with this proposed action.

## **2.3 REQUESTED FEDERAL ACTION**

One action by the FAA is requested:

- Issuance of the Operations Specifications amendment for SkyWest to permit scheduled passenger service at FMA under the requirements of Title 14 CFR 119.

## **2.4 ACTION TIMEFRAME**

The proposed change to the Airline's Operations Specifications would occur in 2012. The change in operations from the Embraer EMB 120ER Brasilia with the Bombardier CRJ700ER would occur sometime afterward, depending on scheduling considerations.

# CHAPTER 3

## ALTERNATIVES

### 3.1 DEFINING THE ALTERNATIVES

The regulations of the President's Council on Environmental Quality (Section 1502.14) state that the alternatives section is the heart of the environmental document. Federal environmental regulations concerning the environmental review process require that all reasonable alternatives, which might accomplish the objectives of the Proposed Action, be identified and evaluated. The alternatives section, "should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public."

Based upon this guidance, six alternatives have been identified, including the No Action:

- Proposed Action
- Use of Other Aircraft Types
- Service Provided by Other Airlines
- Use of Other Airports
- Other Modes of Transportation
- No Action

The above alternatives are evaluated in the sections that follow to determine which are practicable and capable of meeting the project purpose and need. Those alternatives meeting this standard are brought forward into the analysis and evaluated in the subsequent chapter relative to the potential environmental impacts. As noted in FAA Order 1050.1E, "An EA must consider the proposed action and a discussion of the consequences of taking the no action, and may limit the range of alternatives to action and no action when there are no unresolved conflicts concerning alternatives uses of available resources."

### 3.2 PROPOSED ACTION

SkyWest is seeking to replace passenger service using Embraer EMB 120ER Brasilia with service by the Bombardier CRJ700ER. This change is a result of SkyWest's strategy of reducing its use of turboprops. This is of particular importance at the FMA, where it is expected that the proposed CRJ700 service would be more reliable than the current EMB120 service.

### 3.3 USE OF OTHER AIRCRAFT TYPES

While it would be theoretically possible for SkyWest to purchase another aircraft type, it is not practical for an airline to purchase a unique aircraft type for one destination, and neither the FAA nor the Airport have the authority to instruct a carrier to provide service using a different aircraft as long as the proposed aircraft can safely operate at the proposed airport. Therefore, it is concluded that the

alternative of using another aircraft type is not a viable alternative to the Proposed Action. This alternative will not receive further evaluation.

### **3.4 SERVICE PROVIDED BY OTHER AIRLINES**

It would be possible for additional passenger service to be provided by an airline other than SkyWest. However, the requested Federal action is approval of an amendment to SkyWest's Operations Specifications for this airport. Service by another airline would not meet the purpose and need of this project. If another airline wished to add service to this Airport, it would be evaluated as an independent action. Therefore, this alternative will not be evaluated further in this EA.

### **3.5 OTHER MODES OF TRANSPORTATION**

Alternative modes of transportation may provide other options to meet air travel needs of individuals and businesses using the Airport. This type of alternative typically includes rail, highway travel, and telecommunications technologies. The ability of such alternatives to satisfy the need at is largely dependent upon such factors as: 1) availability of the mode of transportation; and 2) trip characteristics and travel needs of the air passengers. Other available modes of transportation to the area include bus and car service. However, due to the distance from other main airports, and therefore, the corresponding increase in travel time, it is not likely that this would replace the need for commercial service at the Airport. Additionally, as stated above, because the request from SkyWest deals specifically with service at FMA, other modes of transportation does not meet the purpose and need. Therefore, it is not carried forward into the EA.

### **3.6 NO ACTION**

NEPA, and its implementing regulations, require consideration of the No Action Alternative. The No Action Alternative, when compared with other alternatives, enables the identification of the probable environmental impact of the proposed action. Under the No Action alternative, SkyWest's existing service using Brasilia's would be retained. The airline would not provide service to the Airport using regional jets. Although the No Action Alternative does not meet the Purpose and Need, its environmental effects will be considered in order to meet the requirements of NEPA.

### **3.7 ALTERNATIVES CARRIED FORWARD FOR EVALUATION**

As noted in FAA Order 1050.1E, "An EA must consider the proposed action and a discussion of the consequences of taking the no action, and may limit the range of alternatives to action and no action when there are no unresolved conflicts concerning alternatives uses of available resources." Based on that guidance and the fact that the other alternatives do not meet the purpose and need, the following alternatives are carried forward into the environmental analysis portion of the EA:

**No Action:** SkyWest's existing service using Brasilia's would be retained. The airline would not provide service to the Airport using regional jets.

**Proposed Action (Preferred Alternative):** SkyWest Airlines would replace passenger service using Embraer EMB 120ER Brasilia with service by the Bombardier CRJ700ER. FAA would approve the associated amendment to SkyWest's Operations Specifications to permit this change and would address the operating characteristics of the CRJ700ER.

## CHAPTER 4

# AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

### 4.1 AIRPORT LOCATION AND STUDY AREA

A Study Area was conservatively defined to encompass those areas on and near the Airport that might be affected by the Proposed Action. The Study Area includes FMA and adjacent areas in the approach-departure corridor and is depicted on the resource figures (See **Figure 4-1**). The rectangular study area is 5,000 feet wide centered on the Airport's runway and as such encompasses almost all of the developed area of Hailey and is approximately the width of the valley around the Airport. It extends 13,000 feet (nominally 2.5 miles) southeast to encompass the northern half of the City of Bellevue. The Study Area also extends 10,000 feet to the northwest. The common arrival and departure flights tracks are encompassed within the Study Area.

The following sections detail the existing environment and the potential environmental impacts that would occur under the No Action and the Proposed Action Alternatives.

### 4.2 AIR QUALITY

Air quality impacts are assessed based upon the Clean Air Act of 1970 and its amendments, and their associated regulations. The principal regulatory guidance is contained in the *National Ambient Air Quality Standards* (NAAQS). Specific guidance for airport projects is provided in the *Air Quality Procedures for Civilian Airports & Air Force Bases* and its 2004 *Addendum*<sup>1</sup>.

There are six air pollutants of concern in the assessment of impacts from airport-related pollutants: carbon monoxide, lead, nitrogen dioxide, ozone, particulates (both PM-10 and PM-2.5), and sulfur dioxide. The Airport is located an area that is in attainment for all six pollutants. Therefore, the General Conformity Rules in the Clean Air Act do not apply to this project.

The *Air Quality Procedures for Civilian Airports & Air Force Bases* indicates that:

If the level of annual enplanements exceeds 1,300,000 (or 2.6 MAP), the level of general aviation and air taxi activity exceeds 180,000 operations per year or a combination thereof, a NAAQS assessment should be considered.

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<sup>1</sup> Air Quality procedures for Civilian Airports & Air Force Bases ADDENDUM, Federal Aviation Administration, Office of Environment & Energy, September 2004.

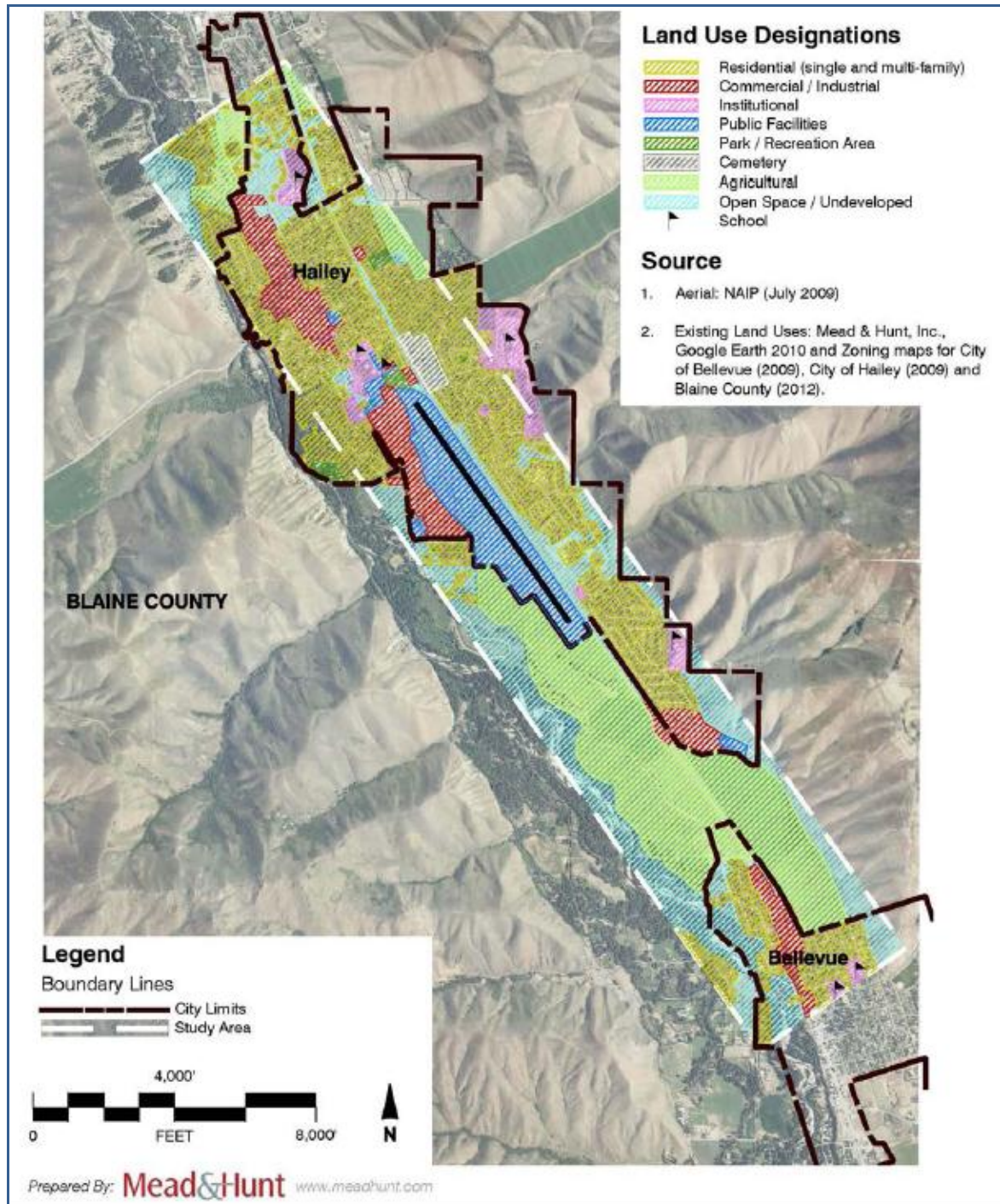


FIGURE 4-1  
EXISTING LAND USES (STUDY AREA)

In 2011, the Airport had 52,639 passenger enplanements and 30,913 aircraft operations (i.e., landings and takeoffs)<sup>2</sup>. These activity levels are lower than the thresholds described above for preparing a NAAQS assessment. Therefore, it can be concluded that neither the Proposed Alternative nor the No Action Alternative would have a significant effect on air quality.

### 4.3 CLIMATE CHANGE/GREEN HOUSE GASES

Research has shown that there is a direct correlation between fuel combustion and greenhouse gases (GHG) emissions. In terms of U.S. contributions, the General Accounting Office (GAO) reports that “domestic aviation contributes about 3 percent of total carbon dioxide emissions, according to Environmental Protection Agency (EPA) data”, compared with other industrial sources, including the remainder of the transportation section (20 percent) and power generation (41 percent)<sup>3</sup>. The international Civil Aviation Organization (ICAO) estimates the GHG emissions from aircraft account for roughly 3 percent of all anthropogenic GHG emissions globally<sup>4</sup>. Climate Change due to GHG emissions is a global phenomenon, so the affected environmental is the global climate<sup>5</sup>.

Although there are no federal standard for aviation-related GHG emission, it is well-established that GHG emissions can affect climate<sup>6</sup>. The Council on Environmental Quality (CEQ) has indicated that climate should be considered in NEPA analysis. As noted by CEQ, however, “it is not currently useful for the NEPA analysis to attempt to link specific climatological changes, or the environmental impacts thereof, to the particular project or emissions; as such direct linkage is difficult to isolate and to understand<sup>7</sup>.”

As noted in the previous section, FMA is located within an area which is in “attainment” area for all criteria pollutants and therefore no quantitative emission inventory analysis was required. According to the Inventory of U.S. Greenhouse Gas Emissions and Sinks from 1990 – 2009, 2% of the U.S 2009 CO<sub>2</sub>-e emissions were from aviation sources. According to Table 3-12 in this report, of this 2% of total 2009 U.S 2009 CO<sub>2</sub>-e emissions, 80% was derived from the usage of commercial jet aircraft. Given that the Proposed Action represents a reduction in aircraft usage at the FMA, the FAA has determined that the increase of GHG emissions, if any at all, as a result of the proposed action is an insignificant one.

### 4.4 COASTAL RESOURCES

Effects on coastal resources are assessed based upon requirements defined in the Coastal Resources Act, the Coastal Zone Management Act and Executive Order 13089, Coral Reef Protection. Barrier islands occur along all coastlines of the United States. Coastal zones are those waters and their

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<sup>2</sup> Agenda package of FMA Authority, February 9, 2012, Attachments 11 and 12.

<sup>3</sup> Aviation and Climate Change. GAO Report to Congressional committees (2009)

<sup>4</sup> Alan Merose, “European ATM and Climate Adaptation: A Scoping Study” in ICAO Environmental Report. (2010)

<sup>5</sup> As explained by the U.S. Environmental Protection Agency, “greenhouse gases, once emitted, become well mixed in the atmosphere, meaning U.S. emissions can affect not only the U.S. population and environment but other regions of the world as well; likewise, emissions in other countries can affect the United States.” Climate Change Division, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Technical Support Document for Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act 2-3 (2009), available at <http://epa.gov/climatechange/endangerment.html>.

<sup>6</sup> See *Massachusetts v. E.P.A.*, 549 U.S. 497, 508-10, 521-23 (2007).

<sup>7</sup> Draft *NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions*, CEQ (2010).

bordering areas in states along the coastlines of the oceans, the Gulf of Mexico and shorelines of the Great Lakes. The Study Area is located in an inland area that does not include any of these coastal resources. Therefore, there would be no impacts relating to coastal resources from either the no action or proposed action alternatives.

## 4.5 COMPATIBLE LAND USES

The Airport is located within the City of Hailey, which is responsible for the planning and zoning within the city limits. Land uses in the vicinity of the Airport include a full range of uses, as shown in **(Figure 4-1)**. As detailed in section 1.2, to the north and east of FMA there is a mixture of residential and commercial land uses, with McKercher City park and Hailey Cemetery to the immediate north of FMA. There is non-residential land use to the northwest of FMA, including a church. Further to the northwest is the historic center of the City of Hailey, which includes more commercial and residential land uses. To the east of FMA there is low-density residential land use along with industrial land use. The land use to the southwest is predominantly agricultural and open/undeveloped with scattered residences. The City of Bellevue is located approximately two miles south of the Airport with the Chantelle subdivision being the closest residential land uses within that jurisdiction.

Neither the No Action Alternative nor the Proposed Action Alternative includes acquisition of land and there are no other anticipated impacts or changes to land use as a result of the Proposed Action.

Noise is evaluated in **Section 4.15**. Noise is commonly evaluated using noise contours developed for an airport's existing and forecast activity levels. The 65 DNL contour is used as the threshold of compatibility for sensitive land uses, such as residences. Under the Proposed Action Alternative, there would be a slight decrease in overall operations (from the reduction of daily flights from SkyWest due to the use of an aircraft that can accommodate more passengers).

These changes results in a slight decrease in the overall area encompassed by the 65 Day Night Level (DNL) contour in 2012 (**See Section 4.15, Noise**). No residential or other sensitive land uses lie within the 65 DNL contour. The 65 DNL contour for the Proposed Action is 3.5 acres smaller than the No Project contour.

Noise contours were also produced for 2017 with and without the Proposed Action (see **Section 4.15, Noise**). Again the contours for the No Action and Proposed Action alternatives are almost identical, with the 65 DNL contour for the Proposed Action being 1.8 acres smaller than for the No Action alternative. As with the 2012 contours, no residential or other sensitive land uses lie within the 2017 65 DNL contour. Therefore, the Proposed Action would not result in any significant noise impacts.

While noise is typically the central compatibility concern for land uses in the vicinity of an airport, safety and airspace protection should also be considered. Safety concerns are usually limited to ensuring that incompatible uses would not be placed within Runway Protection Zones and that wildlife attractants would not be created in the Airport's vicinity. Airspace is normally evaluated based upon the imaginary surfaces defined in Federal Aviation Regulations (FAR) Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace*.

The safety element of land use compatibility is achieved by ensuring that only compatible land uses lay within an airport's runway protection zones. Runway protection zones (RPZ) are trapezoidal areas located 200 feet beyond the usable ends of a runway. The Airport has used displaced thresholds and declared distances to bring the arrival and departure runway protection zones in the approach to Runway 13 onto Airport property. Declared distances also shift the departure runway protection zone beyond Runway end 31 further onto the Airport. According to the FMA Airport Manager, the Departure RPZ extends approximately 900 feet into adjacent agricultural land and the Arrival RPZ extends approximately 1300 feet and 178 feet into the adjacent agricultural land and into the right of way access for State Highway 75, respectively.

Airspace is the final compatibility concern. Numerous objects in the vicinity of the Airport penetrate the airspace surfaces defined in FAR Part 77. These include segments of State Highway 75, various on-Airport buildings and equipment, and a small number of off-airport trees. These penetrations have been addressed through use of a displaced threshold for Runway 13, installation of obstruction lights, and adjustments to the instrument approach minimums. Furthermore, a Letter of Agreement exists between the ATCT and FMA where the taxiways on either side of the runway at FMA would be cleared prior to the departure or landing of category C aircraft such as the CRJ700ER. In this way, the RSA stated necessary for safe operation by the FAA would effectively be provided for these flights.

As stated above, the substitution of a regional jet for service using a turboprop would slightly reduce the size of the noise contours. The Proposed Action would not involve any construction, so no new airspace concerns would be created. Additionally, the Proposed Action would not affect the runway protection zones, so safety is also not a concern. Therefore, the FAA has determined that neither the No Action nor the Proposed Action would have a significant impact on land use compatibility.

## **4.6 CONSTRUCTION IMPACTS**

Construction impacts may include: noise generated by equipment and construction activities; dust and emissions from equipment and vehicles; traffic by crews and trucks delivering materials; water pollution from equipment fuels and lubricants, and construction materials; and disposal of construction debris. Because no construction would occur as a part of the Proposed Alternative or No Action Alternative, no construction-related impacts would occur.

## **4.7 DEPARTMENT OF TRANSPORTATION ACT: SECTION 4(F) RESOURCES**

Section 4(f) of the Department of Transportation Act prohibits the use of certain specific types of publicly owned lands unless there is no feasible and prudent alternative. The types of protected lands include:

- Public park or recreational area
- Wildlife or waterfowl refuge of national, State or local significance
- Land from an historic site of national, State or local significance

In the context of this statute, *use* includes both acquisition of the property and *constructive use*. Constructive use means adverse indirect impacts that affect the functioning or utility of the qualifying 4(f) site.

There are seven parks and public trails within the study area (see **Figure 4-2**). No wildlife refuges are located within the study area. Historic sites listed or eligible for listing in the National Register of Historic Places located near the Airport are shown in **Figure 4-3**.

No property acquisition or ground disturbance would occur as a part of the Proposed Action. So no direct use of the parks, recreation areas and historic sites within the study area would occur. One historic site, Galena Toll Road, State Highway 75, is located within the existing 65 DNL noise contour; however, the historic property is not a noise sensitive resource. Nonetheless, the proposed change in aircraft types would reduce total aircraft noise exposure to the property. The Proposed Action would not introduce new flight tracks, nor would it significantly change existing conditions at the parks, trails or historic sites. As stated in the Noise section, there would be no significant noise increases over parks, cultural, historic, archaeological sites or other potentially 4(f) properties under the Proposed Action. Therefore, the FAA has determined that there would be no significant adverse impacts to 4(f) properties as a result of either the no action or the proposed action alternative.

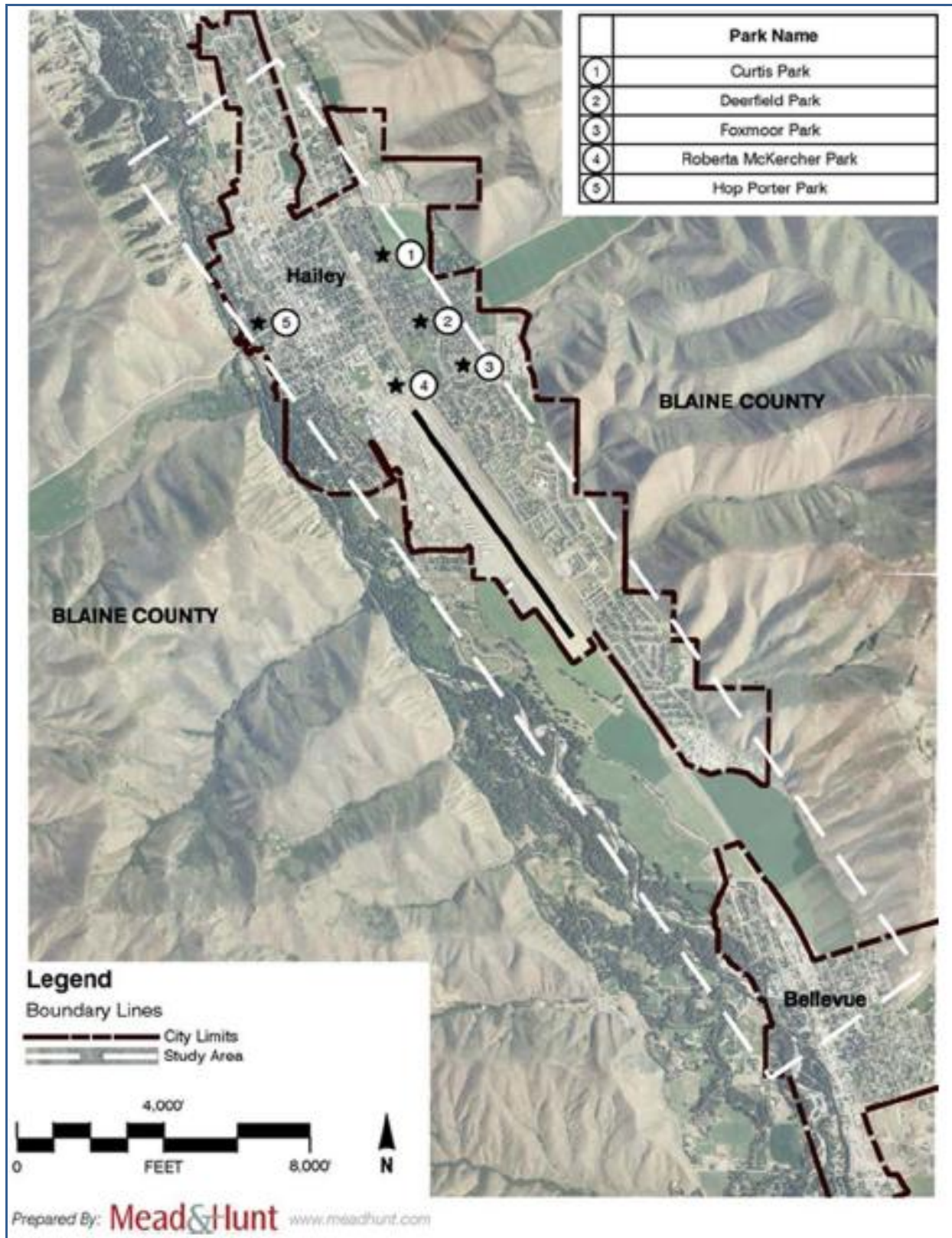


FIGURE 4-2  
PARKS AND RECREATION AREAS

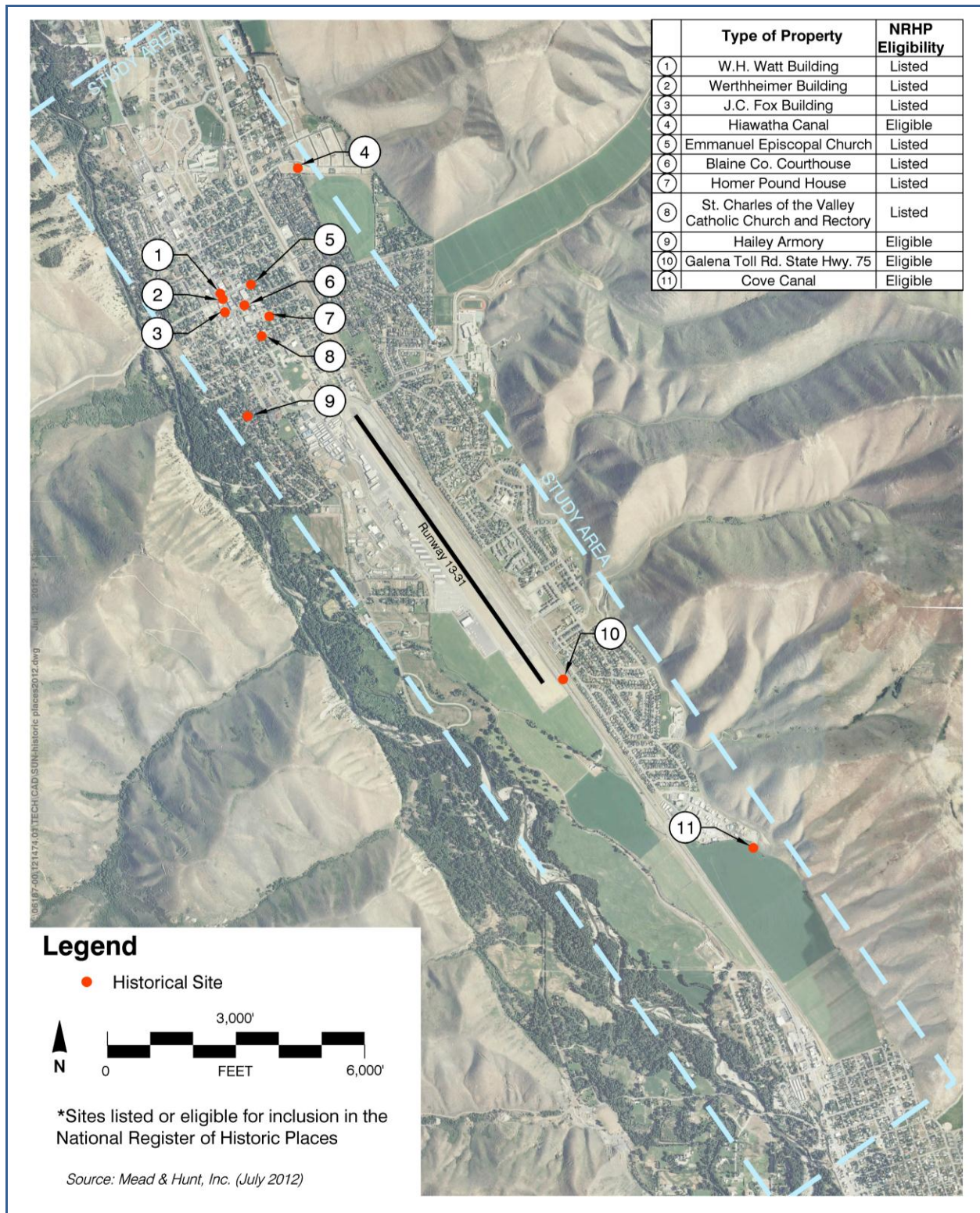


FIGURE 4-3  
HISTORIC SITES

## 4.8 FARMLANDS

The *Farmland Protection Policy Act* (FPPA) regulates Federal actions with the potential to convert farmland to non-agricultural uses. Farmland exists adjacent to the Airport along its southern boundary. Given that neither the Proposed Alternative nor the No Action Alternative would result in acquisition or use of farmland and that the Proposed Action results in a lesser noise impact than the No Action Alternative, there would be no significant adverse impacts to farmland as a result of either the proposed action or the no action alternative.

## 4.9 FISH, WILDLIFE AND PLANTS

Two federally listed Threatened Species and three Candidate Species may occur within Blaine County<sup>8</sup>:

- Bull Trout (*Salvelinus confluentus*) – threatened
- Canada Lynx (*Lynx Canadensis*) – threatened
- Greater Sage-Grouse (*Centrocercus urophasianus*) – candidate
- Yellow-billed Cuckoo (*Coccyzus americanus*) – candidate
- Wolverine (*Gulo gulo*) – candidate
- Whitebark Pine (*Pinus albicaulis*) – candidate

The Federal Endangered Species Act requires the Federal agencies to not take any actions “likely to threaten the existence of any federally listed endangered or threatened species or result in the destruction or adverse modification of critical habitat.”<sup>9</sup> Neither the No Action nor the Proposed Action would involve construction, changes in land use or drainage pattern, introduction of new flight paths, increases in noise levels or other changes that could impact any of the listed species. Therefore, there would be no significant impacts related to listed species.

The Migratory Bird Treaty Act prohibits the intentional take of migratory birds, their eggs or nests by private parties and, under some circumstances, Federal agencies. As the Proposed Action does not include construction, utilizes the same flight paths with a reduction in the noise impact, no intentional take of migratory birds their eggs or nests would occur.

There are a number of Federal statutes and Executive Orders that apply to invasive species, use of native plants in landscaping, and other factors that related to construction activities. Because no construction is proposed, these statutes and Executive Orders do not apply to the Proposed Action.

Between January 2009 and June 2012, there was only one reported bird strike at the Airport.<sup>10</sup> Because the Proposed Action would decrease the number of flights slightly, there would be a slight decrease in

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<sup>8</sup> <http://www.fws.gov/idaho/species/IdahoSpeciesList.pdf>. Accessed on July 10, 2012.

<sup>9</sup> FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*, page A-26.

<sup>10</sup> FAA Wildlife Strike Database, accessed July 2012, <http://wildlife- litigation.tc.faa.gov/wildlife/database.aspx>

potential for wildlife strikes at the Airport. Therefore, there would be no significant impacts related to wildlife strikes.

On 30 July 2012, a correspondence was sent to Mr. Brian Kelly, the State Supervisor for the Idaho State Office of the U. S Fish and Wildlife Service (USFWS) regarding the FAA determination under the Threatened and Endangered Species Act and the Migratory Bird Treaty Act. As of the release of this document, no comments have been received from the USFWS on this project. All communication is found in **Appendix B**.

In summary there would be no affect to any species of concern as a result of either the proposed action or no action alternative.

#### **4.10 FLOODPLAINS**

The requirement to evaluate the floodplains and flood risk is contained in Executive Order 11988, *Floodplain Management*. The *Federal Emergency Management Agency* issues *Flood Insurance Rate Maps* that identify flood risk. *Flood Insurance Rate Maps* 16013C0668E and 16013C0856E<sup>11</sup> indicate that no parts of the Airport lie within a 100-year flood zone. Therefore, passenger service using the CRJ700ER would not expose passengers or crew to significant flood risk. Additionally, no construction would occur as part of the Proposed Action. As neither the Proposed Action nor the No Action Alternative would involve changes in or near the 100-year floodplain, no flood related impacts would occur.

#### **4.11 HAZARDOUS MATERIALS, POLLUTION PREVENTION, AND SOLID WASTE**

Guidance for evaluation of hazardous materials, pollution prevention and solid waste comes principally from two federal statutes: Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended. RCRA regulates the generation, treatment, storage and disposal of hazardous wastes. CERCLA mandates cleanup of hazardous substances released into the environment. These two acts are supported by two Executive Orders (EOs) that direct Federal agencies to comply with applicable pollution control standards (EO 12088) and which delegate most response authority for Superfund cleanups to the Environmental Protection Agency and the United States Coast Guard.

The only hazardous materials associated with the Proposed Action are the fuel (Jet A) and lubricants carried on the aircraft that would begin serving the Airport. The fuel and lubricants in the regional jets are identical with those carried on the turboprops that they would be replacing. The Airport already stores and dispenses these materials according to permits and regulations. The Airport has policies and procedures in place to meet Federal, state and local regulations for storing and handling hazardous wastes. No new facilities or procedures would be required to support regional jet service. Waste generated by operation of the new service would be comparable with the existing service and would not

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<sup>11</sup> *Flood Insurance Rate Maps* accessed at:  
[https://msc.fema.gov/webapp/wcs/stores/servlet/info?storeId=10001&catalogId=10001&langId=-1&content=firmetteHelp\\_A&title=FIRMettes](https://msc.fema.gov/webapp/wcs/stores/servlet/info?storeId=10001&catalogId=10001&langId=-1&content=firmetteHelp_A&title=FIRMettes)

result in any additional hazardous waste or changes to the storage or handling of hazardous waste at the Airport. Based upon this information it is concluded that neither the Proposed Alternative nor No Action Alternative would cause a significant impact from hazardous materials, pollution prevention or solid wastes.

#### **4.12 HISTORICAL, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES**

There are a large number of Federal statutes and Executive Orders guiding protection of the various types of historic and cultural resources, including the requirement for government to government consultation with regard to Tribal interests. The National Historic Preservation Act defines Federal agencies' responsibilities for the protection of sites listed or eligible for listing in the National Register of Historic Places. It also establishes the requirement for consultation with the State Historic Preservation Officer and/or Tribal Historic Preservation Officer if there is a potential for adverse effects on listed or eligible sites.

**Figure 4-3** identifies sites within the Study Area that are listed or eligible for inclusion in the National Register of Historic Places. Most are clustered around the historical center of the City of Hailey. There is also a site (Site 10 – Galena Toll Rd, State Highway 75) located on the southeastern edge of the Airport.

No property acquisition would occur as a part of the Proposed Action. So no direct impacts to any of the historic sites within the study area would occur, and there is no potential for new sites to be disturbed or uncovered. Because there are no direct construction impacts from this project, the official Area of Potential Effect (APE) relates to the defined area impacted by the noise contours in the out year of 2017 (**Figure 4-4**), which depict the only potential for indirect impacts on historic sites. This area contains only one site listed as eligible for inclusion in the National Register of Historic Places (Site 10 – Galena Toll Rd, State Highway 75). This site is located within both the existing (No Action) and the Proposed Action (2012 and 2017) 65 DNL noise contours. Because the level of noise associated with this property would remain consistent under both the Action and the No Action Alternatives (within the 65 DNL contour), and because it the Toll Road is considered a noise compatible property, the Proposed Action would not result in any significant noise impacts on that property.

The proposed change in aircraft types from the Brasilia to the CRJ700ER would reduce the overall size of the 65 DNL noise contour in 2012 and 2017, would not introduce new flight tracks, nor would it significantly change existing conditions at any historic sites. Therefore, it is concluded that it would not create impacts to any historic, cultural or archaeological sites.

On August 8, 2012, the FAA wrote to the Idaho SHPO initiating Section 106 consultation. The FAA received a response from Susan Pengilly, Deputy SHPO for Idaho on August 17, 2012, stating “No additional investigations are recommended. Project can proceed as planned.” There are four Tribes with an interest in the area in the vicinity of the FMA. These are the Shoshone-Paiute Tribes of the Duck Valley Reservation, Northwest Tribe of the Shoshone Tribe, Shoshone-Bannock Tribes of the Fort Hall Reservation and the Shoshone Tribe of Wind River Reservation. The FAA contacted all Tribes on August 8, 2012 to initiate formal government-to-government consultation and to solicit their views regarding potential effect on tribal interests in the area. As of the release of this document, no response has been

received from any of the Tribes. All correspondence with the Tribes and Idaho SHPO is reproduced in **Appendix B**.

#### **4.13 LIGHT EMISSIONS AND VISUAL IMPACTS**

The FAA examines a project's potential light emissions and visual impacts on the nearby area. For airports, light emissions of concern commonly include both ground-based lighting (e.g., approach lighting systems, rotating beacons, runway end identifier lights, and security lighting) and the approach lights on aircraft. Light emissions are of potential concern if a new light source would intrude into a residence or other sensitive receptor. According to *FAA Order 1050.1E, Change 1, Environmental Impacts: Policies and Procedures*, due to relatively low levels of light intensity from airport lights compared to background levels associated with airport development actions, light emissions impacts are unlikely to have an adverse impact on human activity or the use or characteristics of the protected properties.

Visual impacts, according to the FAA, are more subjective because it includes personal aesthetic preferences. These impacts include things such as increasing contrast between an area and its environment and the community's perception of that change. Visual impacts at airports are usually only of potential significance if a new structure would block an important scenic vista or effect the context of an historical site.

The Proposed Action would substitute regional jet service for existing service using turboprops. No new lighting systems would be installed nor new structures introduced. The new aircraft would fly the same routes at the same altitudes as the current airline aircraft and the number of operations as a result of the Proposed Action would decrease slightly due to the larger capacity of the CRJ700ER aircraft. Therefore, there would be no substantial changes to either the lighting or visual environment as a result of either the Proposed Action or No Action alternative.

#### **4.14 NATURAL RESOURCES AND ENERGY IMPACTS**

Limited Federal guidance exists to direct evaluation of this category of impacts. Most are directed towards maximizing energy efficiency in Federal facilities. Energy requirements associated with airport improvements generally fall into two categories: 1) changed demand for stationary facilities (e.g. airfield lighting and terminal building heating) and 2) those that involve the movement of air and ground vehicles, altering fuel consumption.

The Proposed Action would substitute regional jets for turboprop aircraft. Both aircraft utilize Jet A for fuel. The new passenger service would provide fewer flights than currently provided. It would take a detailed assessment that is beyond the scope of this assessment to determine whether the per passenger fuel consumption would be reduced by this change in service. However, the change in fuel consumption, whether positive or negative, would be small in magnitude. It would not require a change in the fuel service or have a measurable effect on the supply of fuel.

The change in the type of aircraft providing service is not anticipated to require changes to the terminal or other airfield facilities. The terminal is already accommodating service by aircraft with larger passenger capacity (i.e., the 76-passenger Bombardier Q-400).

Given the evaluation above, it is concluded that the neither Proposed Action nor the No Action alternative would have a significant impact on natural resources and energy use.

#### 4.15 NOISE

Noise from aircraft operations are typically the impact of greatest concern to residents and businesses in the vicinity of an airport. Noise impacts are commonly measured using noise contours. For Federal projects the Day-Night Average Sound Level (DNL) is used to quantify noise impacts. Federal statutes<sup>12</sup> establish the 65 DNL contour as the threshold of acceptability for sensitive land uses, such as residences. These guidelines indicate that residential development is incompatible within the 65 or greater DNL noise contours. Other noise sensitive land uses, such as schools, hospitals, churches and rest homes are also considered to be incompatible if located within the 65 DNL contour.

Noise contours for this EA were produced using the FAA's Integrated Noise Model (Version 7.0c). The aircraft operations data for current (2012) and forecast (2017) No Action contours were taken from the FAA's 2012 *Terminal Area Forecast* for FMA. In order to calculate the Proposed Action noise contours, the number of passengers currently serviced by SkyWest's EMB120 were assumed to be completely serviced by the CRJ-700. As a result, the frequency of service would be reduced from a high-season peak of 12 daily operations with the EMB-120 to 6 daily operations with its 65-seat CRJ700ER.

**Figure 4-4** presents 65, 70 and 75 DNL noise contours for 2012 with and without the Proposed Action. The two sets of contours are almost identical and are largely contained within the Airport's property boundary. The Proposed Action contour differs from the No Action contour in that it is slightly smaller at the northwest and southeast ends. The change at the northwestern end occurs largely because the regional jet is not anticipated to arrive from the northwest; all regional jet arrivals would be from the southeast. Currently the turboprop airline aircraft arrive from the northwest about 2% of the time. Under the No Action contours, one historic property (the Galena Toll Road) is contained within the 65 DNL noise contour. This historic property is also located within the 65 DNL noise contour under the Proposed Action and because of its nature is considered compatible with that level of noise, so there would be no significant impacts under this alternative. No residential or other sensitive land uses lie within the 65 DNL contour under the Proposed Action. The 65 DNL contour for the Proposed Action is 3.5 acres smaller than the No Action contour. Due to the low volume of operations, INM does not produce a 70 or 75 DNL contour. Therefore, the comparative acreages within these two contours were not calculated. In any case, these two contours lie within the Airport's boundary in both the No Action and Proposed Action alternatives.

Noise contours were also produced for 2017 with and without the Proposed Action (see **Figure 4-5**).

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<sup>12</sup> Code of Federal Regulations Title 14 Part 150 Section A150.101(d).

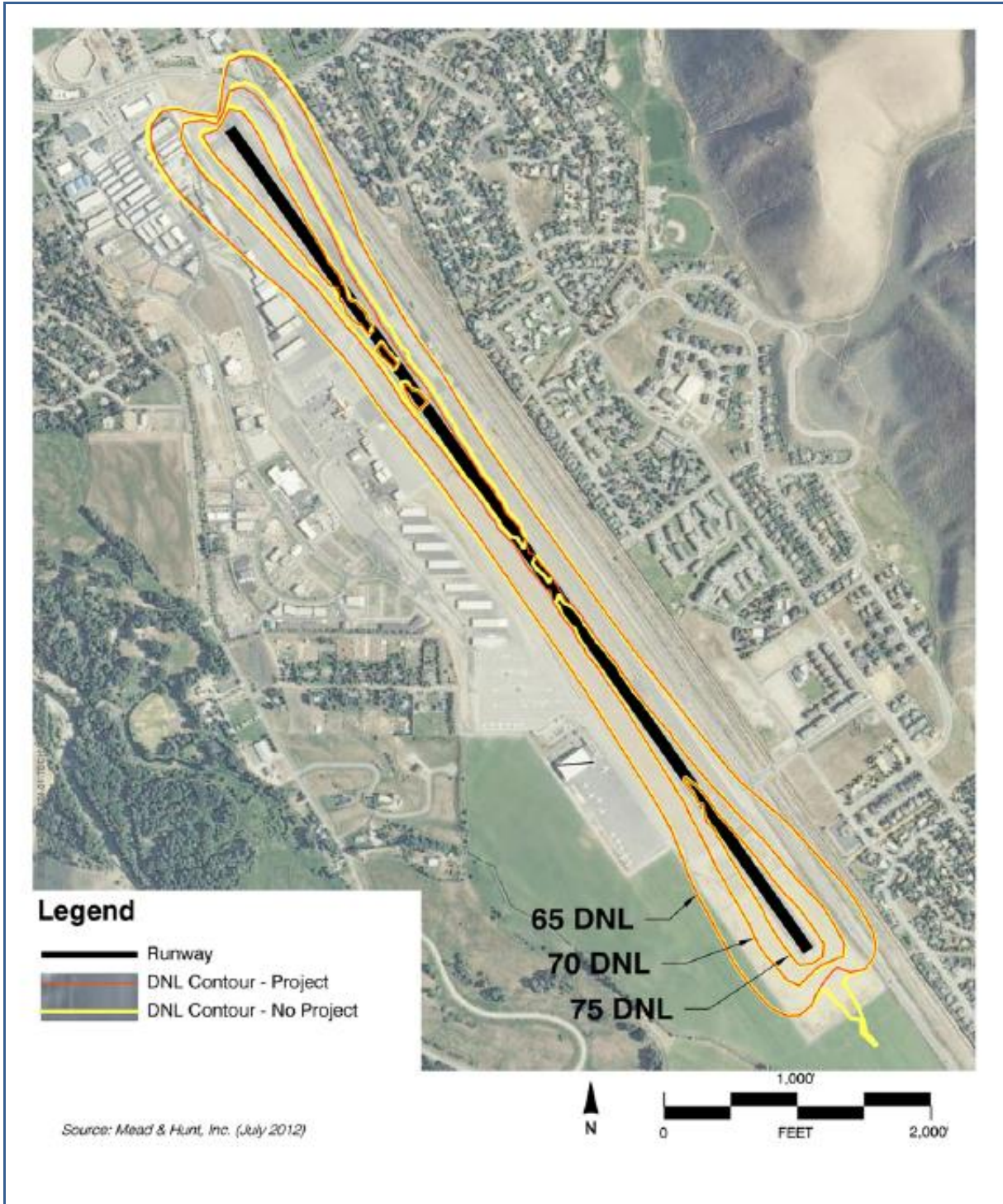


FIGURE 4-4  
NOISE CONTOUR COMPARISON 2012

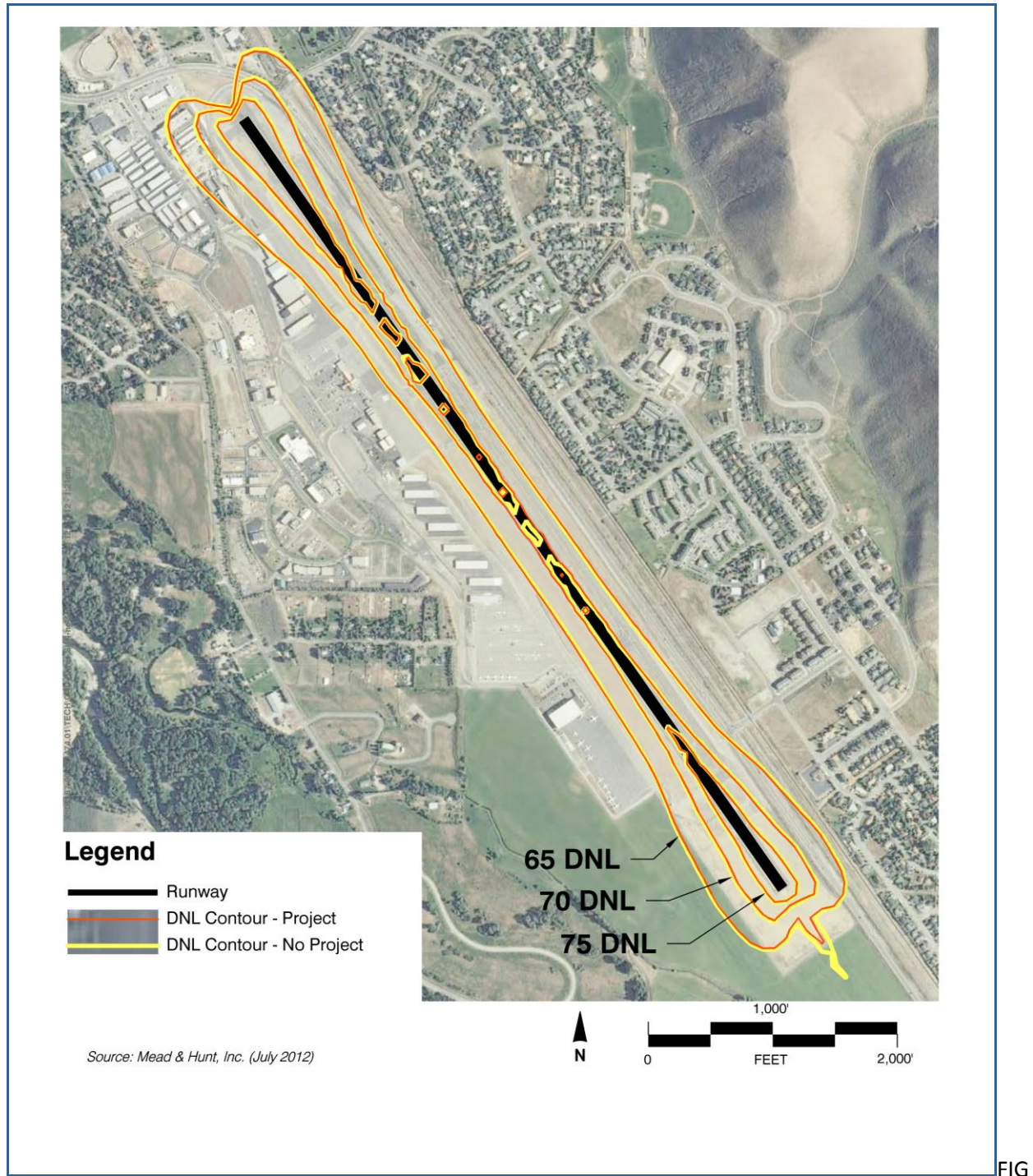


FIGURE 4-5  
NOISE CONTOUR COMPARISON 2017

Again the two contours are almost identical and largely remain within the Airport's property line. The 65 DNL contour for the Proposed Action is 1.8 acres smaller than for the No Action alternative. As with the 2012 contours, no residential or other sensitive land uses lie within the 2017 65 DNL contour. INM did not produce continuous 70 and 75 DNL contours for the 2017 scenarios. The acreage differential for these two sets of contours was not calculated.

Based upon the data presented above, it is concluded that neither the No Action nor the Proposed Action would generate significant noise impacts.

#### **4.16 SECONDARY (INDUCED) IMPACTS**

According to 40 CFR § 1508.8, indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. This is in contrast to cumulative impacts which are the result of incremental accumulation of separate past, present and future reasonably foreseeable actions. Cumulative impacts are dealt in Section 4.21 of this document. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. The terms "effect" and "impact" are used synonymously in the CEQ regulations (40 CFR §1508.8). "Secondary impact" does not appear, nor is it defined in either the CEQ regulations or related CEQ guidance. For purposes of this EA, secondary and indirect impacts mean the same thing.

##### **No Action**

There will be no adverse secondary impacts as a result of the no action alternative.

##### **Proposed Action**

This project solely involves the substitution of airline service using a regional jet for similar service using a turboprop, no construction is involved. Therefore, secondary impacts could only arise from changes related to passenger volumes. The substitution of larger capacity regional jets could lead to an increase in passengers. Were this to occur, it could lead to secondary impacts.

The current load factor (i.e., the percentage of passenger seats filled) for the EMB-120 is around 58%. That is, an average of 42% of the seats are vacant with the current service. This average load factor is not expected to change with the introduction of the CRJ700ER. Based upon the current flight schedule with the 30-seat Brasilia, the existing load factor means that there are over 24,000 vacant (round trip) seats annually. SkyWest has indicated that it would reduce the frequency of service from a high-season peak of 12 daily operations with the Brasilia to 6 daily operations with its 65-seat CRJ700ER. As a result, the annual (round trip) seating capacity would only increase slightly due to introduction of the CRJ700ER: from 58,350 to 58,570 passengers. The increase in capacity is only 18 passengers per month. This difference in capacity is not judged to be large enough to produce secondary impacts. Therefore, it is concluded that the Proposed Action would not produce significant secondary impacts.

#### **4.17 SOCIOECONOMIC IMPACTS, ENVIRONMENTAL JUSTICE, AND CHILDREN'S ENVIRONMENTAL HEALTH AND SAFETY RISKS**

These three classes of impacts would be of potential concern if a project would respectively:

- Acquire property, displace people or divide communities,
- Introduce health or safety risks that disproportionately affect children, or
- Disproportionately affect minority or low-income populations.

The Proposed Action does not include property acquisition, construction, or displacement of people or businesses. Additionally, the project would not result in any significant noise impacts. Therefore, it would not result in socioeconomic impacts to the surrounding communities.

As noted in the relevant sections in this chapter, implementation of the Proposed Action would not introduce new hazardous materials; significantly increase air or water pollution, or change flight paths or approaches that might change the risk exposure. Therefore, the Proposed Action and No Action would produce no significant impacts relating to socioeconomic impacts, environmental justice, or children's health and safety.

#### **4.18 WATER QUALITY**

The Clean Water Act (officially titled the Federal Water Pollution Control Act) contains broad legislation enabling development of water quality standards and management practices. This statutory authority is supported by the Fish and Wildlife Coordination Act which regulates water impoundment projects, and the Safe Drinking Water Act which regulates projects that might contaminate aquifers used as principal drinking water sources.

The Proposed Alternative would only involve substitution of regional jet aircraft for turboprop aircraft. No physical construction would occur. This change would also not introduce new sources of potential water contamination or modify existing water pollution control practices at the Airport. Therefore, neither the Proposed Alternative nor the No Action Alternative would have significant impacts to water quality.

#### **4.19 WETLANDS**

The U.S. Fish and Wildlife Service's *National Wetland Inventory* was accessed on June 27, 2012<sup>13</sup>. The inventory data indicated that there were no wetland features on the airfield itself. There is an isolated wetland of about 0.75 acres southwest of the Airport on an adjacent agricultural parcel. The riverine areas associated with the Big Wood River lie 1,000 to 1,500 feet to the west of the Airport. As neither the Proposed Action nor No Action Alternative would involve construction in these areas or involve other actions that might indirectly affect those wetlands or water quality near the Airport, no impacts to wetlands would occur.

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<sup>13</sup> Website for *National Wetlands Inventory* is: <http://www.fws.gov/wetlands/Data/Mapper.html>

## 4.20 WILD AND SCENIC RIVERS

The only river in the Airport's vicinity is the Big Wood River which located one quarter mile west of the Airport. The Big Wood River is not one of the 22 rivers or river segments in Idaho that have been classified as Wild and Scenic Rivers.<sup>14</sup> Therefore, neither the Proposed Action nor No Action Alternative would impact a designated Wild and Scenic River.

## 4.21 CUMULATIVE IMPACTS

Cumulative impacts are those impacts on the environment that result from the incremental impact of the action added to other past, present, and reasonably foreseeable future actions, regardless of what agency, federal or non-federal or person undertakes such other actions. Cumulative impacts can result from actions which are individually minor, but collectively significant over a period of time. The cumulative impact of implementation of either the Proposed Action or the No Action, when added with other known past, present, and reasonably foreseeable actions, would be collectively insignificant.

Past projects that occurred at the Airport in the past 3–5 years were considered for cumulative impacts analysis. These projects are listed below.

1. Runway 13/31 Reconstruction (2007) – This project included the reconstruction of Runway 13/31 because the pavement was in poor condition. The project also further improved the lateral RSA grading, corrected an existing Line of Sight deficiency and included the installation of a storm drainage system on the east side of the runway.
2. Snow Removal Equipment Building Improvements (2008) – Construction of a roof structure to provide additional covered parking for Snow Removal Equipment. The doors of the existing Snow Removal Equipment building were also upgraded during this project.

There are no current projects at the Airport or in the vicinity of the airport. In checking with the approved project list with the Seattle Airports District Office (ADO) of the FAA and with the FMA Airport Manager there are no future projects planned for the 3–5 year time frame either on or off Airport. As stated above, the FAA indefinitely suspended the EIS for a replacement airport in 2011 due to escalating costs and wildlife issues. There has been no change in this status and thus the project cannot be considered reasonably foreseeable. Currently the FAA is undergoing a planning study to evaluate actual cost and of the changes needed to correct non-standard conditions at the existing airport that currently serves C-II and C-III aircraft, including the Horizon's Q400 and SkyWest's CRJ700ER. This study will evaluate all options, ranging from the physical movement of existing structures which prevent the FMA from meeting design standards to the justification of modification of standards, where appropriate. This study is intended to be completed in December 2012.

In general, the impacts from these federal actions may be thought as occurring from two sources (1) construction of the structures/improvements, and (2) existence of structure/improvements.

With respect to (1) impacts associated with the construction of each of the structures/improvements in the previous page are all temporary in nature, with no long lasting impact. Therefore these impacts

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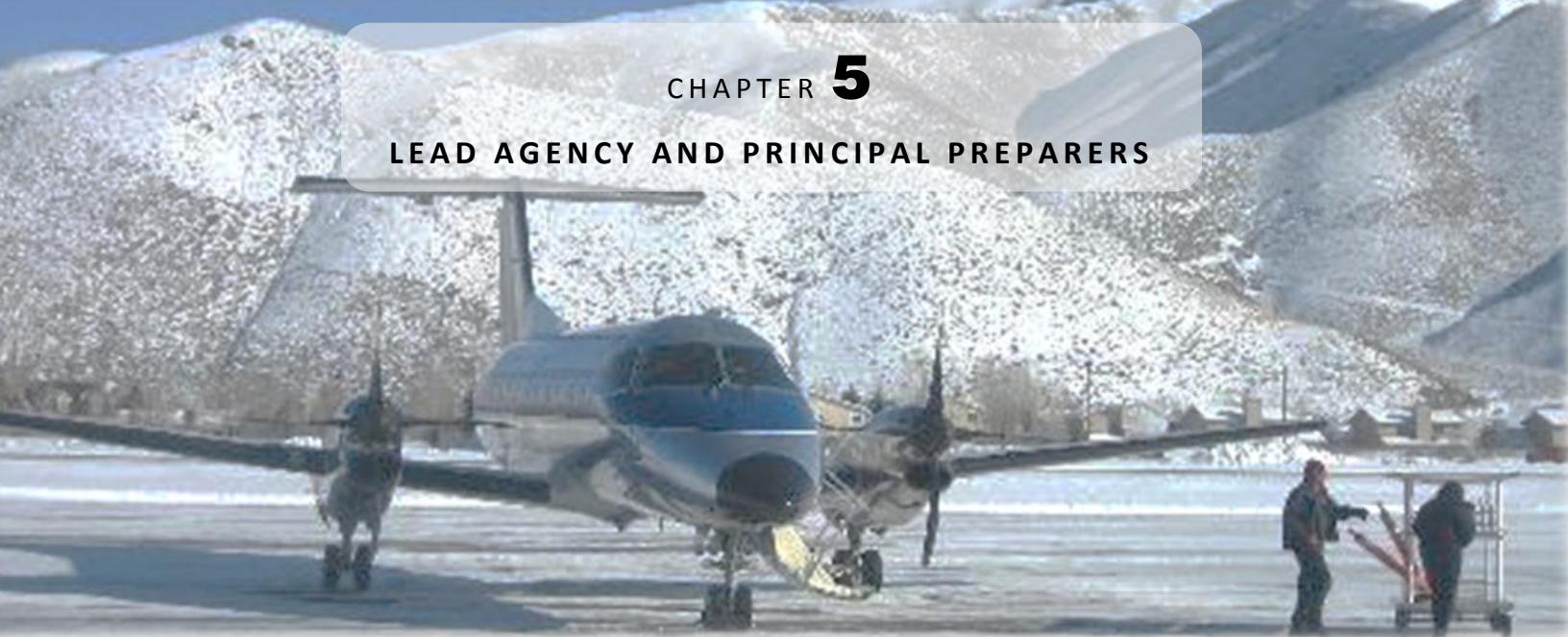
<sup>14</sup> Website for National Wild and Scenic Rivers System listing of designated rivers in Idaho is:  
<http://www.rivers.gov/rivers/idaho.php>

would not directly or indirectly relate to any of the impacts associated with the initiation and operation of scheduled commercial air service using turbojet aircraft at the FMA.

With respect to (2), the impacts discussed in the EA have been based upon impacts resulting from the associated air quality, noise or capacity issues which may arise due to the change in the numbers of landings and take-offs (operations) or enplanements at the FMA. The best way to consider any cumulative impacts would be to ascertain if any of these past, current or reasonable foreseeable actions would result in a change in the operational level or the type of equipment operating at the FMA and to see how the changes as a result of those projects combine with that of the proposed action. Given that the proposed action reduces the number of operations at the FMA, without an anticipated change in the number of enplanements, there are no impacts from the Proposed Action that could combine with other projects to create cumulative impacts.

## **4.22 CONCLUSION**

From the above analysis, there are no significant impacts in any of the environmental impact categories analyzed for either the proposed action or the no-action alternative.



## **LEAD AGENCY**

The Federal Aviation Administration is the lead agency for the preparation of this EA.

Federal Aviation Administration  
ANM-200  
Flight Standards Division  
1601 Lind Avenue SW  
Renton, Washington 98057

## **PRINCIPAL PREPARERS**

Responsibility for preparation of this EA rests with the FMA Authority. Substantial assistance and data analysis was provided by the consultant hired by the Authority. The prime consultant for preparation of this document was Mead & Hunt. Below are the Mead & Hunt staff members who were responsible for the EA preparation.

Brad Rolf, PE, Project Manager and Environmental Planner, B.S. Civil and Environmental Engineering, 16 years airport environmental planning and project management experience.

David P. Dietz, AICP, Senior Airport Planner, 36 years planning experience with 28 of those years in airport planning, B.A. Environmental Politics, Masters in City and Regional Planning.

Kate Andrus, Environmental Planner, 6 years aviation and environmental planning experience, B.A. Biology and M.A. Journalism and Science and Environmental Policy.

Corbett Smith, Airport Planner, 6 years airport planning experience, BA Urban and Regional Planning.

Todd Eroh, Senior Airport Technician, 21 years airport graphic and design experience.

Barbara Emerson, Senior Airport Technician, 21 years airport graphic and design experience, BA Design.

# CHAPTER 6

## CONSULTATION AND COORDINATION

### 6.1 OVERVIEW

Agency coordination and a public involvement program were implemented to ensure that information regarding the Proposed Action and its potential environmental impact are made available to the general public and public agencies, and that input from interested parties is received and considered. The primary components of the agency and public participation program for this Environmental Assessment (EA) include:

- Early agency coordination during the development of the EA
- Publication of the Draft EA and notification of the availability of the Draft EA for public review and comment
- Airport board meetings
- Publication of the Final EA and Federal Aviation Administration decision of whether to issue a Finding of No Significant Impact (FONSI) or to prepare an Environmental Impact Statement.

The following summarizes the public involvement and review process.

### 6.2 EARLY AGENCY COORDINATION

Public and regulatory agencies were contacted during the course of the preparation of this EA to solicit information and preliminary comment. Coordination was conducted for environmental issues having greatest potential for impact and with agencies having specific regulatory authority. The specific agencies contacted are:

- Idaho State Historic Preservation Officer
- Northwest Tribe of the Shoshone Tribe
- Shoshone Tribe of Wind River Reservation
- Shoshone-Bannock Tribes of the Fort Hall Reservation
- Shoshone-Paiute Tribes
- Idaho State office of the U. S Fish and Wildlife Service
- U.S Bureau of Land Management, Twin Falls District

This early agency coordination letters are contained in **Appendix B** of this EA.

### 6.3 PUBLICATION OF THE DRAFT EA FOR PUBLIC REVIEW AND COMMENT

Notification of the availability for public review and comment was placed in the Idaho Mountain Express on September 12<sup>th</sup>, September 14, and September 21, 2012 and was place on the Airport's website. The Draft EA was available for review at FMA as well as City of Hailey Building, Hailey Public Library, Bellevue City Hall, Ketchum City Hall, Carey City Hall, Community Library (Ketchum) and Sun Valley City Hall. Comments on the Draft EA were accepted from September 12, 2012 through October 12, 2012 and were directed to the FMA manager, Mr. Rick Baird. All comments and the responses to those comments are contained in **Appendix C**.

## **6.4 AIRPORT BOARD MEETING**

An airport board meeting was held from 5:30 pm to 8:00 9m on October 2, 2012, at the old Blaine County Courthouse Meeting Room, Hailey, Idaho. This meeting was to inform the FMA Board of the contents and the determinations found in the Draft EA.

## **6.5 FINAL EA**

This Final EA (FEA) was used to determine whether to issue a FONSI or to prepare an Environmental Impact Statement (EIS) (see **Chapter 9** for the FONSI). Notification of the availability of the FEA and FONSI was issued on October 24, 2012, through advertisements in the Idaho Mountain Express.

## CHAPTER **7**

### GLOSSARY

ALP – Airport Layout Plan

APE – Area of Potential Effect

BMP – Best Management Practices

CEQ – Council on Environmental Quality

CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act

CFR – Code of Federal Regulations

CO – Carbon Monoxide

DNL – Day-Night Average Sound Level

EA – Environmental Assessment

EPA – U.S. Environmental Protection Agency

FAA – Federal Aviation Administration

FEMA – Federal Emergency Management Agency

FONSI – Finding of No Significant Impact

FPPA – Farmland Protection Policy Act

MBTA – Migratory Bird Treaty Act

NAAQS – National Ambient Air Quality Standards

NEPA – National Environmental Policy Act

NHPA – National Historic Preservation Act

NO<sub>2</sub> – Nitrogen Dioxide

NPDES – National Pollution Discharge Elimination System

NPS – National Park Service

NRHP – National Register of Historic Places

NRI – National Rivers Inventory

O3 – Ozone

PAPI – Precision Approach Path Indicator

PB – Lead

PM-10/2.5 – Suspended Particulate Matter

RCRA – Resource and Conservation and Recovery Act

SHPO – State Historic Preservation Officer

SO2 – Sulfur Dioxide

SUN – FMA

TAF – Terminal Area Forecast

THPO – Tribal Historic Preservation Officer

USFWS – U.S. Fish and Wildlife Service

## CHAPTER 8

### REFERENCES

Agenda package of FMA Authority, February 9, 2012, Attachments 11 and 12.

*Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions, Council on Environmental Quality*, February 18, 2010, page 2.

*Greenhouse Gas Emissions from the U.S. Transportation Sector, 1990-2003*, U.S. Environmental Protection Agency, March 2006, page 23.

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Digital Airport Facilities Directory, FMA

[http://aeronav.faa.gov/index.asp?xml=aeronav/applications/d\\_afd](http://aeronav.faa.gov/index.asp?xml=aeronav/applications/d_afd)

DOT Order 5610.2, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*, February 11, 1994.

Executive Order 11988, *Floodplain Management*, 1977.

Executive Order 11990, *Protection of Wetlands*, 42 FR 26961.

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, February 16, 1994.

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, April 23, 1997.

Federal Aviation Administration, Order 1050.1E Change 1, *Environmental Impacts: Policies and Procedures*, March 20, 2006.

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- U.S. Code. 1958. Safety Regulation, 49 USC Chapter 447.
- U.S. Code. 1966. The National Historic Preservation Act of 1966, Public Law 89-665; 80 STAT.915; 16 U.S.C. 470.
- U.S. Code. 1968. The Wild and Scenic Rivers Act of 1968, 16 USC 1271-1287, 1977.
- U.S. Code. 1970. The Clean Air Act of 1970, 42 U.S.C. Subsection 7401.
- U.S. Code. 1970. U.S. Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 USC Section 4601.
- U.S. Code. 1973. Endangered Species Act of 1973, 16 U.S.C. Subsection 1531-1544.
- U.S. Code. 1976. Resource Conservation and Recovery Act of 1976, 42 U.S.C. Subsection 6901.
- U.S. Code. 1977. The 1977 Clean Air Act Amendments, 42 U.S.C. Subsection 7401.
- U.S. Code. 1980. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Subsection 9601-9675.
- U.S. Code. 1980. Fish and Wildlife Conservation Act of 1980, 16 U.S.C. Subsection 2901-2912.
- U.S. Code. 1981. The Farmland Protection Policy Act, U.S. Congress, Public Law 97-98, 7 U.S.C. Subsection 4201-4209.
- U.S. Code. 1981. Migratory Bird and Treaty Act, 16 U.S.C. Subsection 703-712.
- U.S. Code. 1987. Federal Water Pollution Control Act, 33 U.S.C. 1251-1376.
- U.S. Code. 1990. The 1990 Clean Air Act Amendments, 42 U.S.C. Subsection 7401.
- U.S. Code. 1996. Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801-1882.
- U.S. Code. 2007. President's Council on Environmental Quality Regulations, 40 CFR Part 1502, Section 1502.16(e)
- U. S. Code. 1984. Airport Noise Compatibility Planning, 14 CFR Part 150, Section A150.101(d)

## CHAPTER 9

### FINDING OF NO SIGNIFICANT IMPACT

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed federal action is consistent with existing national environmental policies and objectives as set forth in section 101)(a) of the National Environmental Policy Act of 1969 (NEPA) and other applicable environmental requirements and that it will not significantly affect the quality of the human environmental or otherwise include any condition required consultation pursuant to section 102(2)(c) of NEPA

APPROVED: Norman LeFevre

DATE: 10/22/12

Norman B LeFevre  
Manager, NextGen Branch  
Flight Standards Division FAA  
Northwest Mount Region

APPENDIX **A**  
LETTER OF INTENT



March 5, 2012

Andrew Ayers  
Principal Operations Inspector  
SkyWest Certificate Management Office  
1020 N. Flyer Way (2130 West)  
Salt Lake City, UT 84116-2959

In accordance with FAR 121 Subpart E, this letter is to inform you of SkyWest Airlines' intent to begin new service to the following cities on the dates indicated below:

City Pair	<b>SLC SUN</b>
Start Date	15JUN 12
Carrier	SkyWest
Aircraft	CRJ 700
Aircraft Change	YES
Previous Aircraft	DH8
Previous Carrier	N/A
Day	1
Night	1
Frequency	2RT

---

~~We have been informed by Caroline Poyurs, FAA Environmental Specialist, EA~~  
would not be necessary due to turbo-jet history in the 1990's. (Please see the e-  
mail attached). Ms. Poyurs' e-mail is Caroline.CTR.Poyurs@faa.gov, in the  
event you need to contact her for further clarification.

In addition, enclosed find the Briefing Guide for SUN.

March 5, 2012  
Page two

These routes have been examined and comply with FAR's 121.93(a) (b), 121.95(a)(b), 121.97(a)(b)(c), 121.99(a)(b), 121.101(a)(b)(c)(d), 121.103(a)(b), 121.105 and 121.107.

Awaiting your approval,

A handwritten signature in black ink, appearing to read "Chris Brown", written in a cursive style.

Chris Brown  
Director Aircraft Operations

APPENDIX **B**

**COORDINATION LETTERS**



C.L. "Butch" Otter  
Governor of Idaho

Janet Gallimore  
Executive Director

Administration  
2205 Old Penitentiary Road  
Boise, Idaho 83712-8250  
Office: (208) 334-2682  
Fax: (208) 334-2774

Membership and Fund  
Development  
2205 Old Penitentiary Road  
Boise, Idaho 83712-8250  
Office: (208) 514-2310  
Fax: (208) 334-2774

Historical Museum and  
Education Programs  
610 North Julia Davis Drive  
Boise, Idaho 83702-7695  
Office: (208) 334-2120  
Fax: (208) 334-4059

State Historic Preservation  
Office and Historic Sites  
Archeological Survey of Idaho  
210 Main Street  
Boise, Idaho 83702-7264  
Office: (208) 334-3861  
Fax: (208) 334-2775

Statewide Sites:  
• Franklin Historic Site  
• Pierce Courthouse  
• Rock Creek Station and  
• Stricker Homesite

Old Penitentiary  
2445 Old Penitentiary Road  
Boise, Idaho 83712-8254  
Office: (208) 334-2844  
Fax: (208) 334-3225

Idaho State Archives  
2205 Old Penitentiary Road  
Boise, Idaho 83712-8250  
Office: (208) 334-2620  
Fax: (208) 334-2626

North Idaho Office  
112 West 4th Street, Suite #7  
Moscow, Idaho 83843  
Office: (208) 882-1540  
Fax: (208) 882-1763



Historical Society is an  
Equal Opportunity Employer.

**DATE:** August 17, 2012

**TO:** Norman Le Fevre, FAA

**FEDERAL AGENCY:** FAA

**PROJECT NAME:** SkyWest Airlines' Operation Specifications for Freidman  
Memorial Airport, Hailey, Idaho

### Section 106 Evaluation

The field work and documentation presented in this report meet the Secretary of the Interior's Standards.

**X** No additional investigations are recommended. Project can proceed as planned.

Additional information is required to complete the project review. (See comments below.)

Additional investigations are recommended. (See comments below.)

### Identification of Historic Properties (36 CFR 900.4):

**X** No historic properties were identified within the project area.

Property is not eligible. Reason:

Property is eligible for listing in the National Register of Historic Places.

Criterion: \_ A \_ B \_ C \_ D Context for Evaluation:

**X** No historic properties will be affected within the project area.

### Assessment of Adverse Effects (36 CFR 800.5):

Project will have *no adverse effect* on historic properties.

Property will have an *adverse effect* on historic properties. Additional consultation is required.

### Comments:

*Susan Pengilly*

**Susan Pengilly, Deputy SHPO  
State Historic Preservation Office**

**August 17, 2012**  
**Date**



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Northwest Mountain Region**  
Colorado, Idaho, Montana,  
Oregon, Utah, Washington,  
Wyoming

Flight Standards Regional Office  
1601 Lind Ave SW., Suite 560  
Renton, Washington 98057

August 6, 2012

Mr. Bruce Perry  
Northwest Tribe of the Shoshone Tribe  
707 N. Main Street  
Brigham City, UT 84302

Dear Mr. Perry:

The Federal Aviation Administration (FAA) and the Friedman Memorial Airport Authority (Authority) are preparing an Environmental Assessment (EA) to evaluate potential impacts of introduction of turbojet passenger service to Friedman Memorial Airport (Airport). This Proposed Operational Specification amendment involves the replacement of the existing Embraer EMB 120ER Brasilia with the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats, resulting in a shift from providing 3 to 6 flights per day with the smaller aircraft to per day to 2 to 3 flights per day with the CRJ700. This would result in a net decrease in operations and no construction or property acquisition would occur as a part of this project. A study area has been defined for the purposes of assessing environmental impacts. A graphic showing the study area is attached as Enclosure 1. The FAA is the lead Federal agency for the proposed project. The Authority is the Airport sponsor. The purpose of this letter is to initiate formal government-to-government consultation regarding this project and to solicit your views regarding potential effect on tribal interests in the area.

Project Information

The Airport is owned by the City of Hailey and Blaine County and is operated by the Friedman Memorial Airport Authority. The Authority proposes to permit introduction of turbojet service to replace existing scheduled passenger service using turboprops. More specifically, existing scheduled service using Embraer EMB 120ER Brasilia would be replaced with service by the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats (as configured for SkyWest operating as Delta Connection).

SkyWest would shift from providing 3 to 6 flights per day to 2 to 3 flights per day. The greater seating capacity of the CRJ700ER (65 seats as configured for Delta Connection) compared to the Brasilia (30 seats) makes it possible to meet existing and forecast demand with fewer aircraft. The shift in aircraft types would occur within the next 6 months.

The specific Federal action proposed is issuance of amended Operations Specifications to SkyWest to permit introduction of scheduled passenger service using the CRJ700ER. The amendment will identify the aircraft to be used, the operations authorized and any limitations, deviations or exemptions. The FAA will review the change to ensure that the proposed operating procedures meet the agency's safety standards.

The proposed action would not require any construction or property acquisition. The existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Existing facilities are adequate to accommodate the aircraft and associated passengers. Noise contours prepared for the Environmental Assessment indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Because there would be no construction or property acquisition associated with this project, no cultural resources field investigations were undertaken.

#### Confidentiality

We appreciate that you may have concerns about the confidentiality of information on areas or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure confidentiality of such information is maintained.

#### Consultation

If you wish to provide comments related to this proposed project, please contact Norman LeFevre, by mail at ANM-220, FAA Northwest Mountain Regional Office, 1601 Lind Ave, Renton WA 98057, email ([norman.b.lefevre@faa.gov](mailto:norman.b.lefevre@faa.gov)) or phone at 425-917-6780.

Your timely response will greatly assist us in incorporating your concerns into the environmental review process.

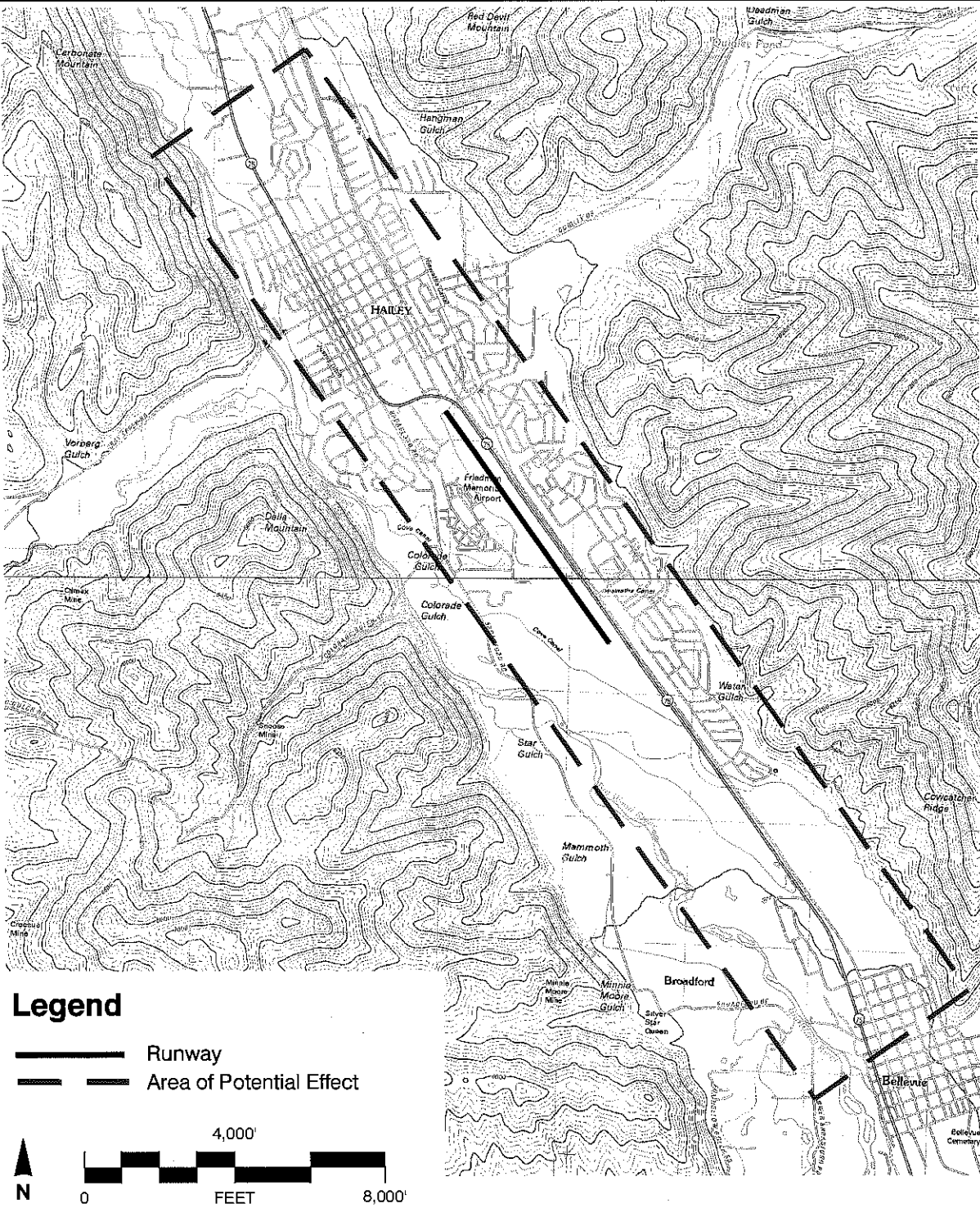
Sincerely,



Norman LeFevre  
ANM-220 Branch Manager, FAA Northwest Mountain Region

Enclosure: Study Area graphic

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Enclosure 1

## Area of Potential Effect

Freidman Memorial Airport



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Northwest Mountain Region**  
Colorado, Idaho, Montana,  
Oregon, Utah, Washington,  
Wyoming

Flight Standards Regional Office  
1601 Lind Ave SW., Suite 560  
Renton, Washington 98057

August 6, 2012

Mr. Mike Lajeunesse  
Shoshone Tribe of Wind River Reservation  
P.O. Box 217  
Fort Washakie, WY 82514

Dear Mr. Lajeunesse:

The Federal Aviation Administration (FAA) and the Friedman Memorial Airport Authority (Authority) are preparing an Environmental Assessment (EA) to evaluate potential impacts of introduction of turbojet passenger service to Friedman Memorial Airport (Airport). This Proposed Operational Specification amendment involves the replacement of the existing Embraer EMB 120ER Brasilia with the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats, resulting in a shift from providing 3 to 6 flights per day with the smaller aircraft to per day to 2 to 3 flights per day with the CRJ700. This would result in a net decrease in operations and no construction or property acquisition would occur as a part of this project. A study area has been defined for the purposes of assessing environmental impacts. A graphic showing the study area is attached as Enclosure 1. The FAA is the lead Federal agency for the proposed project. The Authority is the Airport sponsor. The purpose of this letter is to initiate formal government-to-government consultation regarding this project and to solicit your views regarding potential effect on tribal interests in the area.

#### Project Information

The Airport is owned by the City of Hailey and Blaine County and is operated by the Friedman Memorial Airport Authority. The Authority proposes to permit introduction of turbojet service to replace existing scheduled passenger service using turboprops. More specifically, existing scheduled service using Embraer EMB 120ER Brasilia would be replaced with service by the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats (as configured for SkyWest operating as Delta Connection).

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The amendment will identify the aircraft to be used, the operations authorized and any limitations, deviations or exemptions. The FAA will review the change to ensure that the proposed operating procedures meet the agency's safety standards.

The proposed action would not require any construction or property acquisition. The existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Existing facilities are adequate to accommodate the aircraft and associated passengers. Noise contours prepared for the Environmental Assessment indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Because there would be no construction or property acquisition associated with this project, no cultural resources field investigations were undertaken.

Confidentiality

We appreciate that you may have concerns about the confidentiality of information on areas or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure confidentiality of such information is maintained.

Consultation

If you wish to provide comments related to this proposed project, please contact Norman LeFevre, by mail at ANM-220, FAA Northwest Mountain Regional Office, 1601 Lind Ave, Renton WA 98057, email (norman.b.lefevre@faa.gov) or phone at 425-917-6780.

Your timely response will greatly assist us in incorporating your concerns into the environmental review process.

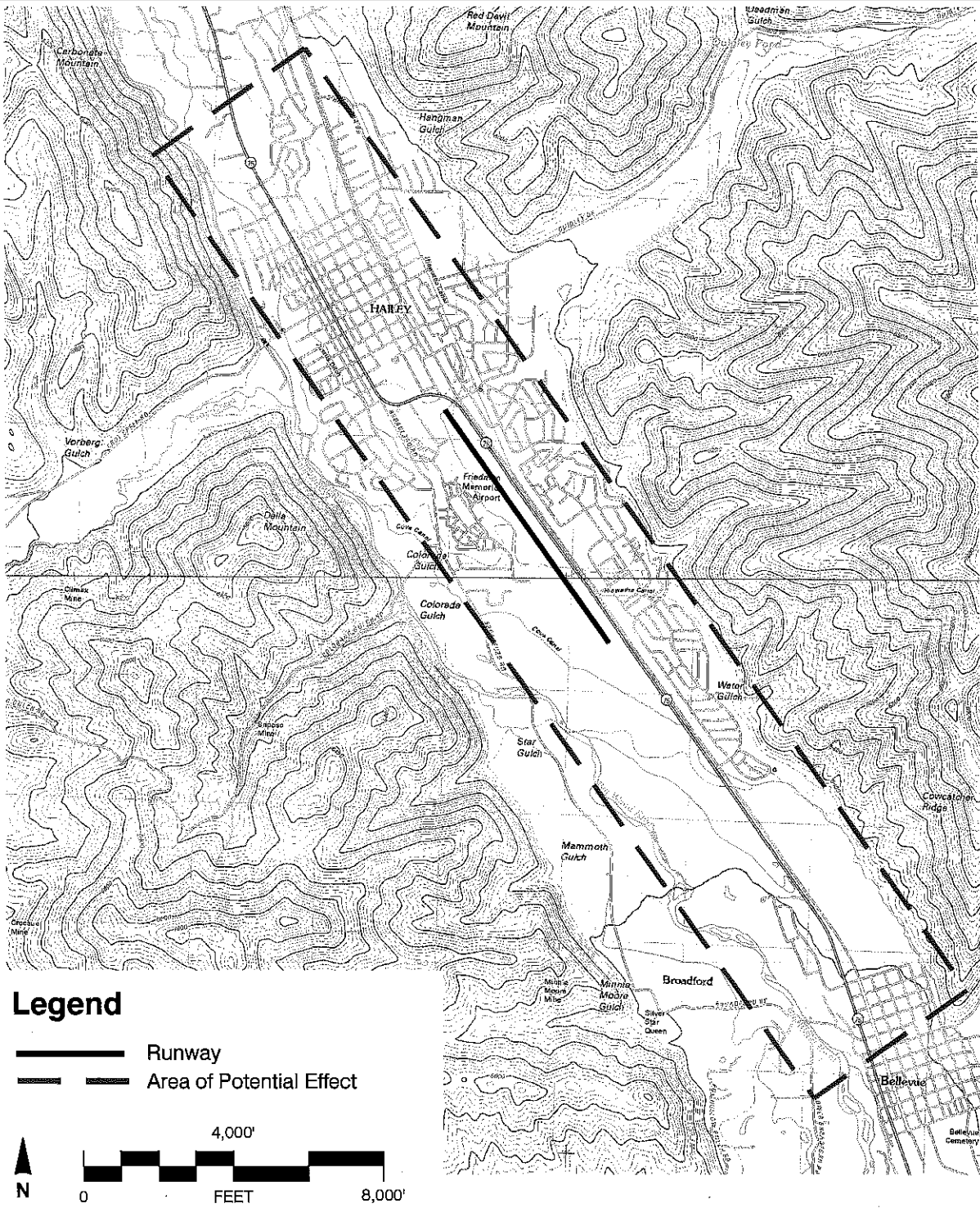
Sincerely,

A handwritten signature in cursive script that reads "Norman LeFevre".

Norman LeFevre  
ANM-220 Branch Manager, Northwest Mountain Region

Enclosure: Study Area graphic

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Enclosure 1

**Area of Potential Effect**  
Freidman Memorial Airport



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Northwest Mountain Region**  
Colorado, Idaho, Montana,  
Oregon, Utah, Washington,  
Wyoming

Flight Standards Regional Office  
1601 Lind Ave SW., Suite 560  
Renton, Washington 98057

August 2, 2012

Mr. Nathan Smith  
Shoshone-Bannock Tribes of the Fort Hall Reservation  
P.O. Box 306  
Fort Hall, ID 83203-0306

Dear Mr. Smith:

The Federal Aviation Administration (FAA) and the Friedman Memorial Airport Authority (Authority) are preparing an Environmental Assessment (EA) to evaluate potential impacts of introduction of turbojet passenger service to Friedman Memorial Airport (Airport). This Proposed Operational Specification amendment involves the replacement of the existing Embraer EMB 120ER Brasilia with the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats, resulting in a shift from providing 3 to 6 flights per day with the smaller aircraft to per day to 2 to 3 flights per day with the CRJ700. This would result in a net decrease in operations and no construction or property acquisition would occur as a part of this project. A study area has been defined for the purposes of assessing environmental impacts. A graphic showing the study area is attached as Enclosure 1. The FAA is the lead Federal agency for the proposed project. The Authority is the Airport sponsor. The purpose of this letter is to initiate formal government-to-government consultation regarding this project and to solicit your views regarding potential effect on tribal interests in the area.

#### Project Information

The Airport is owned by the City of Hailey and Blaine County and is operated by the Friedman Memorial Airport Authority. The Authority proposes to permit introduction of turbojet service to replace existing scheduled passenger service using turboprops. More specifically, existing scheduled service using Embraer EMB 120ER Brasilia would be replaced with service by the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats (as configured for SkyWest operating as Delta Connection).

SkyWest would shift from providing 3 to 6 flights per day to 2 to 3 flights per day. The greater seating capacity of the CRJ700ER (65 seats as configured for Delta Connection) compared to the Brasilia (30 seats) makes it possible to meet existing and forecast demand with fewer aircraft. The shift in aircraft types would occur within the next 6 months. The specific Federal action proposed is issuance of amended Operations Specifications to SkyWest to permit introduction of scheduled passenger service using the CRJ700ER. The

amendment will identify the aircraft to be used, the operations authorized and any limitations, deviations or exemptions. The FAA will review the change to ensure that the proposed operating procedures meet the agency's safety standards.

The proposed action would not require any construction or property acquisition. The existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Existing facilities are adequate to accommodate the aircraft and associated passengers. Noise contours prepared for the EA indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Because there would be no construction or property acquisition associated with this project, no cultural resources field investigations were undertaken.

#### Confidentiality

We appreciate that you may have concerns about the confidentiality of information on areas or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure confidentiality of such information is maintained.

#### Consultation

If you wish to provide comments related to this proposed project, please contact Norman LeFevre, by mail at ANM-220, FAA Northwest Mountain Regional Office, 1601 Lind Ave, Renton WA 98057, email ([norman.b.lefevre@faa.gov](mailto:norman.b.lefevre@faa.gov)) or phone at 425-917-6780.

Your timely response will greatly assist us in incorporating your concerns into the environmental review process.

Sincerely,



Norman LeFevre  
ANM-220 Branch Manager,  
Northwest Mountain Region

Enclosure: 1 Study Area graphic





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Northwest Mountain Region**  
Colorado, Idaho, Montana,  
Oregon, Utah, Washington,  
Wyoming

Flight Standards Regional Office  
1601 Lind Ave SW., Suite 560  
Renton, Washington 98057

August 8, 2012

Mr. Ted Howard  
Shoshone-Paiute Tribes  
of the Duck Valley Reservation  
P.O. Box 219  
Owyhee, NV 89832

Dear Mr. Howard:

The Federal Aviation Administration (FAA) and the Friedman Memorial Airport Authority (Authority) are preparing an Environmental Assessment (EA) to evaluate potential impacts of introduction of turbojet passenger service to Friedman Memorial Airport (Airport). This Proposed Operational Specification amendment involves the replacement of the existing Embraer EMB 120ER Brasilia with the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats, resulting in a shift from providing 3 to 6 flights per day with the smaller aircraft to per day to 2 to 3 flights per day with the CRJ700. This would result in a net decrease in operations and no construction or property acquisition would occur as a part of this project. A study area has been defined for the purposes of assessing environmental impacts. A graphic showing the study area is attached as Enclosure 1. The FAA is the lead Federal agency for the proposed project. The Authority is the Airport sponsor. The purpose of this letter is to initiate formal government-to-government consultation regarding this project and to solicit your views regarding potential effect on tribal interests in the area.

#### Project Information

The Airport is owned by the City of Hailey and Blaine County and is operated by the Friedman Memorial Airport Authority. The Authority proposes to permit introduction of turbojet service to replace existing scheduled passenger service using turboprops. More specifically, existing scheduled service using Embraer EMB 120ER Brasilia would be replaced with service by the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats (as configured for SkyWest operating as Delta Connection).

SkyWest would shift from providing 3 to 6 flights per day to 2 to 3 flights per day. The greater seating capacity of the CRJ700ER (65 seats as configured for Delta Connection) compared to the Brasilia (30 seats) makes it possible to meet existing and forecast demand with fewer aircraft. The shift in aircraft types would occur within the next 6 months. The specific Federal action proposed is issuance of amended Operations Specifications to SkyWest to permit introduction of scheduled passenger service using the CRJ700ER.

The amendment will identify the aircraft to be used, the operations authorized and any limitations, deviations or exemptions. The FAA will review the change to ensure that the proposed operating procedures meet the agency's safety standards.

The proposed action would not require any construction or property acquisition. The existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Existing facilities are adequate to accommodate the aircraft and associated passengers. Noise contours prepared for the Environmental Assessment indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Because there would be no construction or property acquisition associated with this project, no cultural resources field investigations were undertaken.

Confidentiality

We appreciate that you may have concerns about the confidentiality of information on areas or resources of religious, traditional, and cultural importance to the Tribe. We would be happy to discuss these concerns and develop procedures to ensure confidentiality of such information is maintained.

Consultation

If you wish to provide comments related to this proposed project, please contact Norman LeFevre, by mail at ANM-220, FAA Northwest Mountain Regional Office, 1601 Lind Ave, Renton WA 98057, email (norman.b.lefevre@faa.gov) or phone at 425-917-6780.

Your timely response will greatly assist us in incorporating your concerns into the environmental review process.

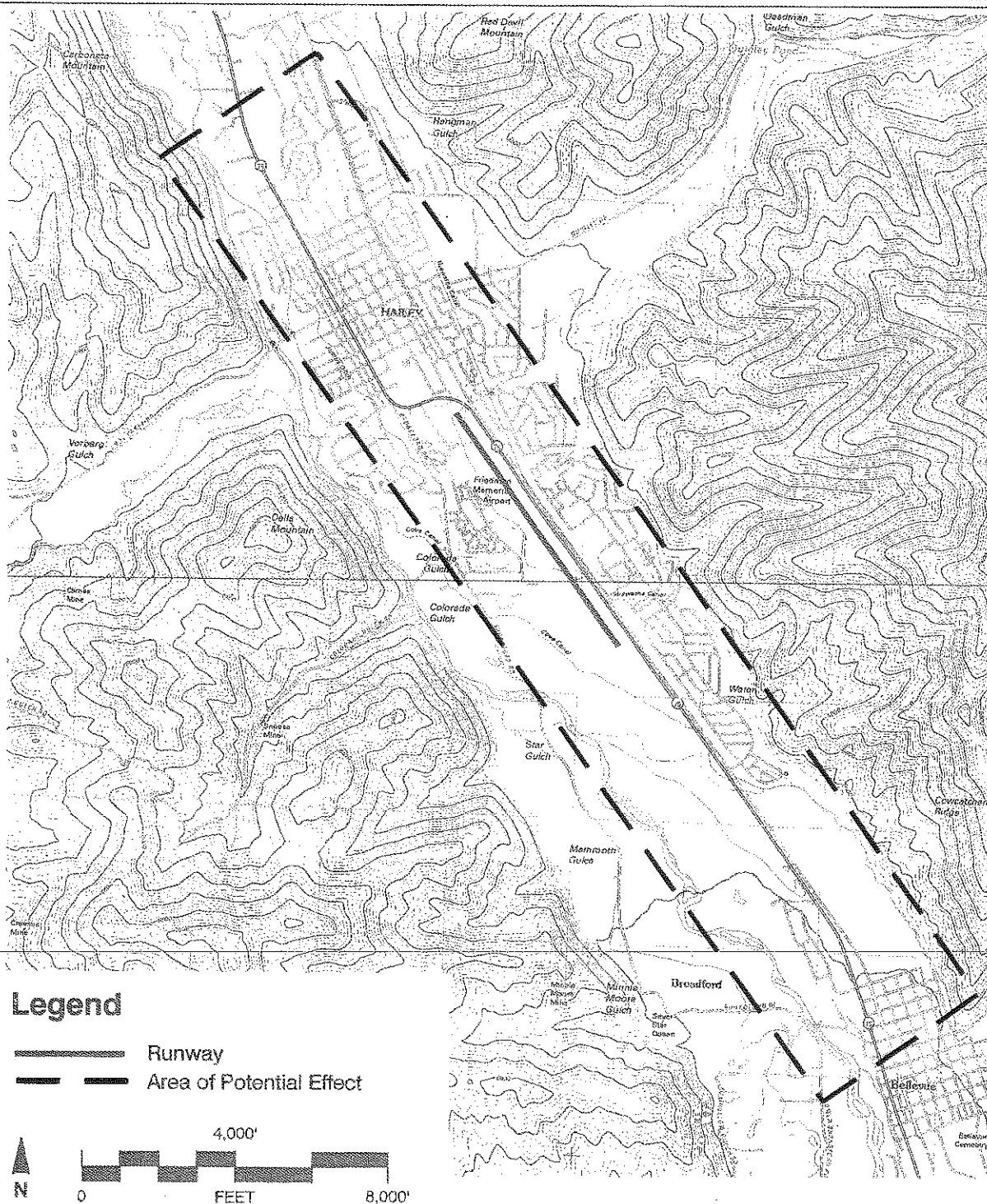
Sincerely,

A handwritten signature in cursive script that reads "Norman LeFevre".

Norman LeFevre  
ANM-220 Branch Manager, Northwest Mountain Region

Enclosure: Study Area graphic

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### Legend

- Runway
- Area of Potential Effect



Prepared By: **Mead&Hunt** [www.meadhunt.com](http://www.meadhunt.com)

Enclosure 1

**Area of Potential Effect**  
Friedman Memorial Airport



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Northwest Mountain Region**  
Colorado, Idaho, Montana,  
Oregon, Utah, Washington,  
Wyoming

Flight Standards Regional Office  
1601 Lind Ave SW., Suite 560  
Renton, Washington 98057

August 2, 2012

Mr. Brian Kelly  
State Supervisor, Idaho State Office  
U.S. Fish and Wildlife Service  
1387 S. Vinnell Way, Suite 368  
Boise, ID 83709

Subject: Proposed Federal Action at Friedman Memorial Airport – Migratory Bird Treaty  
Act Consultation and Endangered Species Act.

Dear Mr. Kelly:

The Federal Aviation Administration (FAA) is currently involved in the preparation of an Environmental Assessment in order to evaluate the impact for the proposed introduction of turbojet service to Friedman Memorial Airport and proposed Operational Specification amendment for SkyWest. The Airport is owned by the City of Hailey and Blaine County and is operated by the Friedman Memorial Airport Authority.

Project Information

The Authority proposes to permit introduction of turbojet service to replace existing scheduled passenger service using turboprops. More specifically, existing scheduled service using Embraer EMB 120ER Brasilia would be replaced with service by the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats (as configured for Delta Connection).

SkyWest would shift from providing 3 to 6 flights per day to 2 to 3 flights per day. The greater seating capacity of the CRJ700ER (65 seats as configured for Delta Connection) compared to the Brasilia (30 seats) makes it possible to meet existing and forecast demand with fewer aircraft. The shift in aircraft types would occur within the next 6 months. No construction would occur as a result of this project.

The specific Federal action proposed is issuance of amended Operations Specifications to SkyWest to permit introduction of scheduled passenger service using the CRJ700ER. The amendment will identify the aircraft to be used, the operations authorized and any limitations, deviations or exemptions. The FAA will review the change to ensure that the proposed operating procedures meet the agency's safety standards.

Findings

On July, 2012, an official United States Fish and Wildlife Service (USFWS) list of Federal Endangered and Threatened Species (including Candidate and Proposed Species) was obtained at: <http://www.fws.gov/idaho/species/IdahoSpeciesList.pdf>. This list is attached as an enclosure (1). It identifies these species and their likelihood to appear in the proposed project area.

The proposed action would not require any construction or property acquisition. Existing facilities are adequate to accommodate the aircraft and associated passengers. Existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Noise contours prepared for the Environmental Assessment indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Due to the lack of construction associated with this project, no biological field investigations were undertaken. It was concluded that the lack of construction and retention of existing flight tracks would avoid any impacts to habitat or protected species.

Determination

Based on these findings, the FAA has determined that the proposed introduction of turbojet aircraft to provide passenger service to the Airport would have "No Affect" on any listed endangered or threatened species or their designated critical habitat. Furthermore, given that existing flight paths would only be utilized and that there would be a reduction in the number of flights to and from Friedman Memorial Airport, the FAA has determined that there would be no affect under the Migratory Bird Treaty Act.

The FAA kindly requests concurrence of this from the USFWS. Your attention to this matter is appreciated. If you have any questions or need additional information on this submittal, please contact Norman LeFevre, at 425-917-6780 or email at [Norman.b.lefevre@faa.gov](mailto:Norman.b.lefevre@faa.gov).

Sincerely,



Norman LeFevre  
Manager NextGen Branch,  
Northwest Mountain Region

Enclosure: (1) U.S. Fish and Wildlife Service, Idaho State Office, Federal Endangered and Threatened Species that Occur in or may be Affected by Projects in Blaine County.

Findings

On July, 2012, an official United States Fish and Wildlife Service (USFWS) list of Federal Endangered and Threatened Species (including Candidate and Proposed Species) was obtained at: <http://www.fws.gov/idaho/species/IdahoSpeciesList.pdf>. This list is attached as an enclosure (1). It identifies these species and their likelihood to appear in the proposed project area.

The proposed action would not require any construction or property acquisition. Existing facilities are adequate to accommodate the aircraft and associated passengers. Existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Noise contours prepared for the Environmental Assessment indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Due to the lack of construction associated with this project, no biological field investigations were undertaken. It was concluded that the lack of construction and retention of existing flight tracks would avoid any impacts to habitat or protected species.

Determination

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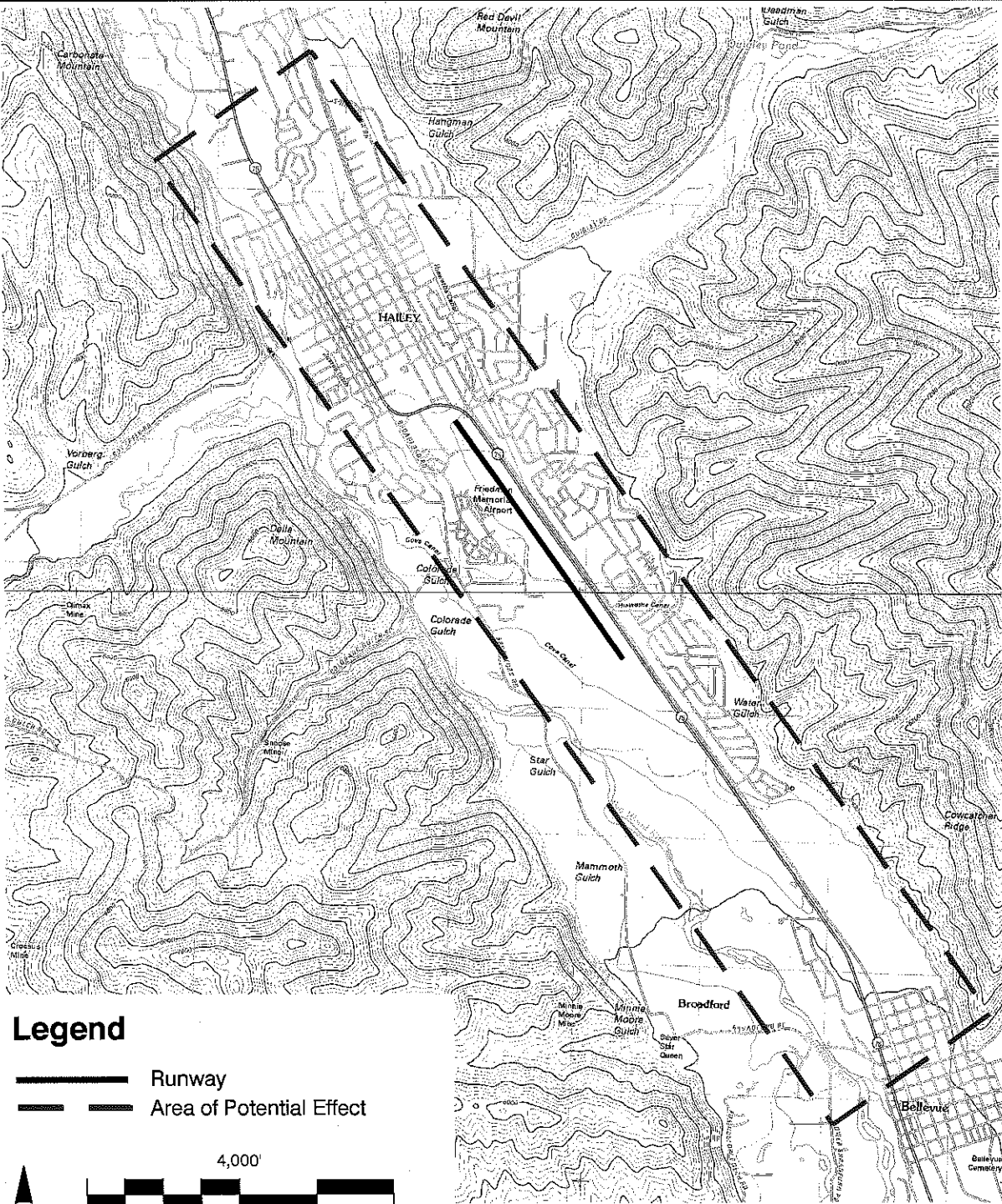
The FAA kindly requests concurrence of this from the USFWS. Your attention to this matter is appreciated. If you have any questions or need additional information on this submittal, please contact Norman LeFevre, at 425-917-6780 or email at [Norman.b.lefevre@faa.gov](mailto:Norman.b.lefevre@faa.gov).

Sincerely,

Norman LeFevre  
Manager NextGen Branch,  
Northwest Mountain Region

Enclosure: (1) U.S. Fish and Wildlife Service, Idaho State Office, Federal Endangered and Threatened Species that Occur in or may be Affected by Projects in Blaine County

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## Legend

- Runway
- Area of Potential Effect



Prepared By: Mead&Hunt [www.meadhunt.com](http://www.meadhunt.com)

Enclosure 1

## Area of Potential Effect Freidman Memorial Airport



## United States Department of the Interior IDAHO FISH AND WILDLIFE OFFICE

1387 S. Vinnell Way, Room 368  
Boise, Idaho 83709  
Telephone (208) 378-5243  
<http://www.fws.gov/idaho>



Enclosure 1

### **U.S. Fish and Wildlife Service - Idaho Fish and Wildlife Office** **Endangered, Threatened, Proposed, and Candidate Species** **With Associated Proposed and Critical Habitats** *(Updated August 17, 2011)*

#### **Federal Agency Assistance and Consultation**

Section 7(c) of the Endangered Species Act directs the U.S. Fish and Wildlife Service to consult with federal agencies on any proposed actions (direct or indirect) on federal lands that may potentially affect listed, proposed or candidate species or their habitat.

It is the responsibility of federal "action agencies" (or their designated representatives) to obtain an official table ("Species List") of listed, proposed and candidate species that may be present where the proposed activity is to occur. If the project potentially affects the species or its habitat, the federal agency is required to consult with the Service.

To assist agencies with this task, the Service prepares and regularly updates Species Lists by county. The lists are valid for up to 180 days. Species List areas may be larger than the footprint of the proposed activity. Status changes, such as listings, delistings or critical habitat designations, will be updated immediately by the Service so the action agency will always have access to the most current information for project planning.

For comprehensive information specific to federal agency assistance and consultation, go to: <http://www.fws.gov/idaho/agencies.htm>

#### **Obtaining Species Lists for Proposed Federal Actions**

The Fish and Wildlife Service is developing a web-based system that will allow Action Agencies to generate project-specific Species Lists. We will provide instructions when the new web-based species list system is launched.

Until then, please obtain an official "T&E Species List" directly from the Service's Idaho FWS website, which is organized by county for your proposed activity consultation.

This list will ensure that your project records contain the most current species information. Please print and retain a copy of this list with your project records. Should your project plans expand or change to include additional counties, you will need to check the website for an updated list, and reprint a new species list for your files.

To obtain the most current County Species List (PDF file for download), click on the link under "Obtaining an Official T&E Species List for Proposed Federal Actions" - [www.fws.gov/idaho/species/IdahoSpeciesList.pdf](http://www.fws.gov/idaho/species/IdahoSpeciesList.pdf).

## Listed, Proposed, and Candidate Species Designated and Proposed Critical Habitat in Idaho (Last Updated 08/17/2011)

Page 1 of 6

Grouping	Amphibian	Bird	
Common Name	Columbia spotted frog - Great Basin population	Greater Sage-Grouse	Yellow-billed cuckoo
Scientific Name	<i>Rana luteiventris</i>	<i>Centrocercus urophasianus</i>	<i>Coccyzus americanus</i>
Status	[C]	[C]	[C]
Ada		X	X
Adams		X	
Bannock		X	X
Bear Lake		X	
Benewah			
Bingham		X	X
Blaine		X	X
Boise			X
Bonner			
Bonneville		X	X
Boundary			
Butte		X	
Camas		X	
Canyon			X
Caribou		X	
Cassia		X	X
Clark		X	X
Clearwater			
Custer		X	X
Elmore		X	X
Franklin		X	
Fremont		X	X
Gem		X	
Gooding		X	
Idaho			X
Jefferson		X	X
Jerome		X	
Kootenai			X
Latah			X
Lemhi		X	X
Lewis			X
Lincoln		X	
Madison		X	X
Minidoka		X	X
Nez Perce			
Oneida		X	
Owyhee	X	X	X
Payette		X	
Power		X	
Shoshone			
Teton			
Twin Falls	X	X	X
Valley			
Washington		X	

[C] Candidate  
[P] Proposed

[T] Threatened  
[E] Endangered

[CH] Designated Critical Habitat  
[PCH] Proposed Critical Habitat

Grouping	Mammal				
Common Name	Canada lynx		Grizzly bear	Northern Idaho ground squirrel	Selkirk Mountain caribou
Scientific Name	<i>Lynx canadensis</i>		<i>Ursus arctos horribilis</i>	<i>Spermophilus brunneus brunneus</i>	<i>Rangifer tarandus caribou</i>
Status	[T]	[CH]	[T]	[T]	[E]
Ada					
Adams	x			x	
Bannock					
Bear Lake	x				
Benewah	x				
Bingham					
Blaine	x				
Boise	x				
Bonner	x		x		x
Bonneville	x		x		
Boundary	x	x	x		x
Butte	x				
Camas	x				
Canyon					
Caribou	x				
Cassia					
Clark	x		x		
Clearwater	x				
Custer	x				
Elmore	x				
Franklin	x				
Fremont	x		x		
Gem					
Gooding					
Idaho	x				
Jefferson	x				
Jerome					
Kootenai	x				
Latah	x				
Lemhi	x				
Lewis					
Lincoln					
Madison	x				
Minidoka					
Nez Perce	x				
Oneida					
Owyhee					
Payette					
Power					
Shoshone	x				
Teton	x		x		
Twin Falls					
Valley	x			x	
Washington				x	

[C] Candidate  
[P] Proposed

[T] Threatened  
[E] Endangered

[CH] Designated Critical Habitat  
[PCH] Proposed Critical Habitat

Grouping	Mammal	
Common Name	Southern Idaho ground squirrel	Wolverine
Scientific Name	<i>Spermophilus brunneus enemicus</i>	<i>Gulo gulo</i>
Status	[C]	[C]
Ada		x
Adams	x	x
Bannock		x
Bear Lake		x
Benewah		x
Bingham		x
Blaine		x
Boise		x
Bonner		x
Bonneville		x
Boundary		x
Butte		x
Camas		x
Canyon		x
Caribou		x
Cassia		
Clark		x
Clearwater		x
Custer		x
Elmore		x
Franklin		x
Fremont		x
Gem	x	x
Gooding		x
Idaho		x
Jefferson		x
Jerome		
Kootenai		x
Latah		x
Lemhi		x
Lewis		x
Lincoln		x
Madison		x
Minidoka		
Nez Perce		x
Oneida		
Owyhee		
Payette	x	
Power		
Shoshone		x
Teton		x
Twin Falls		x
Valley		x
Washington	x	x

[C] Candidate

[P] Proposed

[T] Threatened

[E] Endangered

[CH] Designated Critical Habitat

[PCH] Proposed Critical Habitat

Grouping	Fish				Mollusk			
Common Name	Bull trout		Kootenai River white sturgeon		Banbury Springs lanx	Bliss Rapids snail	Bruneau hot springsnail	Snake River physa snail
Scientific Name	<i>Salvelinus confluentus</i>		<i>Acipenser transmontanus</i>		<i>Lanx sp.</i>	<i>Talorconcha serpenticola</i>	<i>Pyrgolopsis bruneauensis</i>	<i>Haitia (Physa) natricinia</i>
Status	[T]	[CH]	[E]	[CH]	[E]	[T]	[E]	[E]
Ada	x							x
Adams	x	x						
Bannock								
Bear Lake								
Benewah	x	x						
Bingham								
Blaine	x	x						
Boise	x	x						
Bonner	x	x						
Bonneville								
Boundary	x	x	x	x				
Butte	x	x						
Camas	x	x						
Canyon								x
Caribou								
Cassia								x
Clark								
Clearwater	x	x						
Custer	x	x						
Elmore	x	x				x		x
Franklin								
Fremont								
Gem	x	x						
Gooding					x	x		x
Idaho	x	x						
Jefferson								
Jerome						x		x
Kootenai	x	x						
Latah								
Lemhi	x	x						
Lewis	x	x						
Lincoln								
Madison								
Minidoka								x
Nez Perce	x	x						
Oneida								
Owyhee	x	x					x	x
Payette	x							x
Power								
Shoshone	x	x						
Teton								
Twin Falls					x	x		x
Valley	x	x						
Washington	x	x						x

[C] Candidate  
[P] Proposed

[T] Threatened  
[E] Endangered

[CH] Designated Critical Habitat  
[PCH] Proposed Critical Habitat

Grouping	Plant					
Common Name	Christ's paintbrush	Goose Creek milkvetch	Macfarlane's four-o'clock	Packard's Milkvetch	Slickspot peppergrass	
Scientific Name	<i>Castilleja christii</i>	<i>Astragalus anserrinus</i>	<i>Mirabilis macfarlanei</i>	<i>Astragalus cusickii</i> var. <i>parkardiae</i>	<i>Lepidium papilliferum</i>	
Status	[C]	[C]	[T]	[C]	[T]	[PCH]
Ada					x	x
Adams						
Bannock						
Bear Lake						
Benewah						
Bingham						
Blaine						
Boise						
Bonner						
Bonneville						
Boundary						
Butte						
Camas						
Canyon					x	x
Caribou						
Cassia	x	x				
Clark						
Clearwater						
Custer						
Elmore					x	x
Franklin						
Fremont						
Gem					x	x
Gooding						
Idaho			x			
Jefferson						
Jerome						
Kootenai						
Latah						
Lemhi						
Lewis						
Lincoln						
Madison						
Minidoka						
Nez Perce						
Oneida						
Owyhee					x	x
Payette				x	x	x
Power						
Shoshone						
Teton						
Twin Falls						
Valley						
Washington						

[C] Candidate  
[P] Proposed

[T] Threatened  
[E] Endangered

[CH] Designated Critical Habitat  
[PCH] Proposed Critical Habitat

Grouping	Plant			
Common Name	Spalding's catchfly	Ute ladies'-tresses	Water Howellia	Whitebark Pine
Scientific Name	<i>Silene spaldingii</i>	<i>Spiranthese diluvialis</i>	<i>Howellia aquatilis</i>	<i>Pinus albicaulis</i>
Status	[T]	[T]	[T]	[C]
Ada				
Adams				x
Bannock				
Bear Lake				x
Benewah	x		x	
Bingham		x		
Blaine				x
Boise				x
Bonner				x
Bonneville		x		x
Boundary				x
Butte				x
Camas				x
Canyon				
Caribou				x
Cassia				
Clark				x
Clearwater				x
Custer				x
Elmore				x
Franklin				
Fremont		x		x
Gem				x
Gooding				
Idaho	x			x
Jefferson		x		
Jerome				
Kootenai	x		x	
Latah	x		x	
Lemhi				
Lewis	x			
Lincoln				
Madison		x		
Minidoka				
Nez Perce	x			
Oneida				
Owyhee				
Payette				
Power				
Shoshone	x		x	x
Teton				x
Twin Falls				
Valley				x
Washington				x

[C] Candidate  
[P] Proposed

[T] Threatened  
[E] Endangered

[CH] Designated Critical Habitat  
[PCH] Proposed Critical Habitat



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Northwest Mountain Region**  
Colorado, Idaho, Montana,  
Oregon, Utah, Washington,  
Wyoming

Flight Standards Regional Office  
1601 Lind Ave SW., Suite 560  
Renton, Washington 98057

August 6, 2012

Ms. Suzi Pengilly  
Deputy State Historic Preservation Officer  
Idaho State Historic Preservation Office  
210 Main St.  
Boise ID 83702

Dear Ms. Pengilly:

The Federal Aviation Administration (FAA) is the lead federal agency responsible for an environmental determination in accordance with the National Environmental Policy Act (NEPA) for the approval of the proposed modification of SkyWest Airlines' (Airline) Operations Specifications for Friedman Memorial Airport in Hailey, Idaho. The modification would permit the Airline to introduce regional jet service. Approval of the modification to the Operations Specifications constitutes a Federal undertaking, requiring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 Code of Federal Regulations (CFR) Part 800. This letter is submitted to initiate consultation with the State Historic Preservation Office (SHPO) pursuant to 36 CFR Part 800.2(c) (1) (i) and 36 CFR Part 800.3(c) and request your concurrence with the Area of Potential Effect (APE) as depicted in Enclosure 1.

#### **Description of Proposed Undertaking**

SkyWest is proposing to replace its existing service using the Embraer EMB 120ER Brasilia with service by the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats (as configured for Delta Connection). The substitution of an aircraft with more seating capacity would result in a reduction from the current schedule of 3 to 6 flights per day to 2 to 3 flights per day. Seasonal variation in passenger demand accounts for the range in the number of daily flights. The shift in aircraft types would occur within the next 6 months.

The proposed action would not require any construction or property acquisition. Existing facilities are adequate to accommodate the aircraft and associated passengers. Existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Noise contours prepared for the Environmental Assessment indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Due to the lack of construction associated with this project, no cultural field

investigations were undertaken. It was concluded that the lack of construction and retention of existing flight tracks would avoid any impacts to historic or cultural sites.

An APE was defined to encompass those areas on and near the Airport that might be affected by the Proposed Project (see Enclosure). The Study Area includes the Friedman Memorial Airport and adjacent areas in the approach-departure corridor. The rectangular study area is 5,000 feet wide centered on the Airport's runway. It extends 13,000 feet (nominally 2.5 miles) southeast of the runway end to encompass the northern half of the City of Bellevue. The Study area also extends 10,000 feet to the northwest of the runway end. The common arrival and departure flight tracks are encompassed within the Study Area.

The latitude and longitude of the four corners of the APE are as follows:

- Northwestern corner: N43° 31' 50.48", W114° 19' 59.56"
- Northeastern corner: N43° 32' 18.98", W114° 19' 04.12"
- Southwestern corner: N43° 27' 44.02", W114° 16' 00.54"
- Southeastern corner: N43° 28' 12.48", W114° 15' 05.13"

#### **Native American Consultation**

Concurrent with this letter, the FAA has sent letters to the four tribes on the Native American Heritage Commission (NAHC) list requesting they provide information concerning the proposed project area if any was available.

#### **Summary of Findings and Determination of Effect**

Based upon available data the FAA has determined that there are 15 properties listed or eligible for listing on the National Register of Historic Places (NRHP) within the APE. Given the usage of existing flight paths and the reduction in noise levels, the FAA has also determined that the proposed undertaking will not affect any properties listed or eligible for listing on the NRHP. No construction activities will be undertaken so there is no potential for accidental discovery of buried archaeological resources.

The FAA seeks concurrence from the State Historic Preservation Officer on its no historic properties affected [Section 800.11(d)] determination for the Proposed Action.

If you have any questions or need additional information on this submittal, please contact Norman LeFevre at [Norman.b.lefevre@faa.gov](mailto:Norman.b.lefevre@faa.gov) or at 425-917-6780.

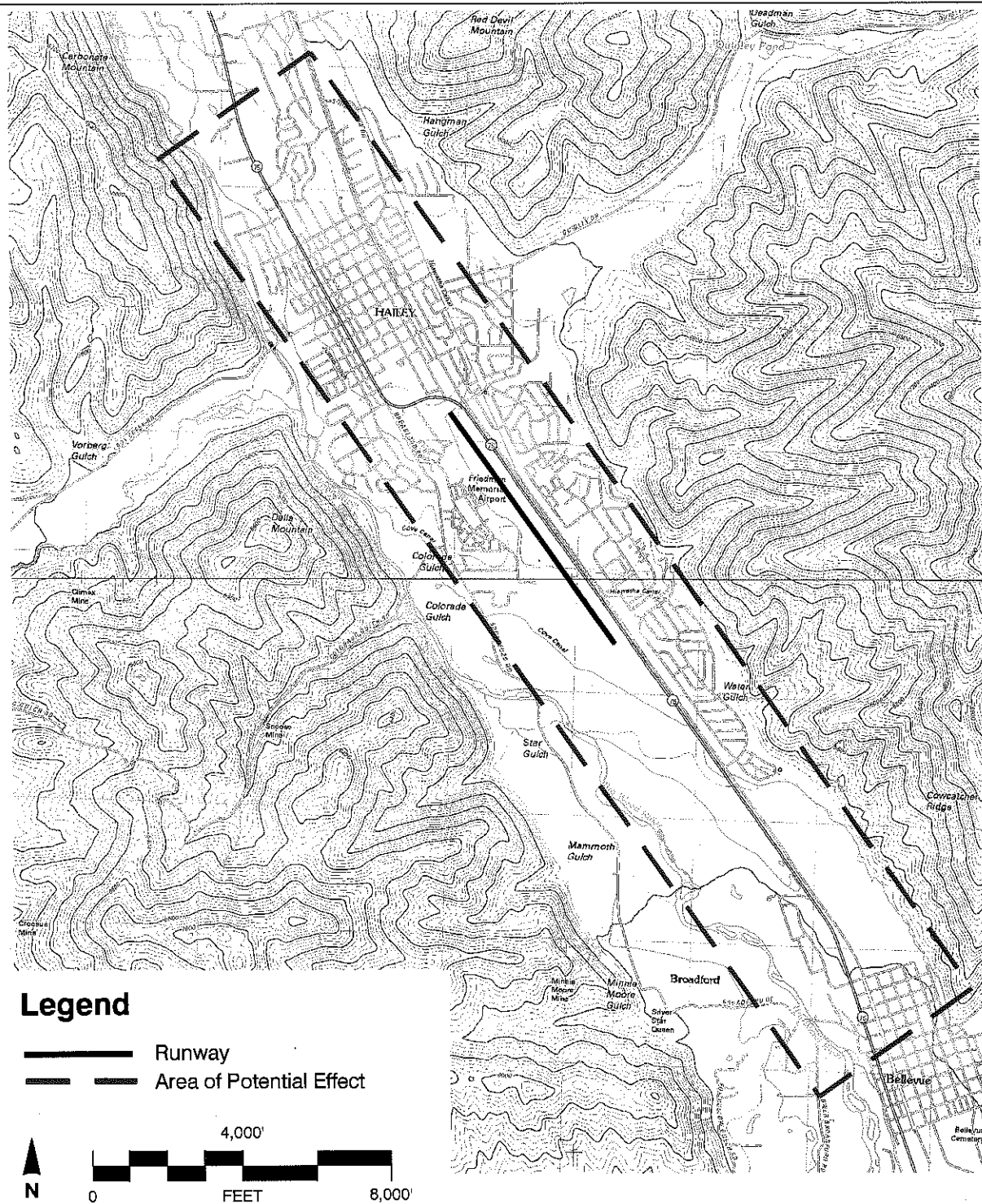
Sincerely,



Norman LeFevre  
NextGen Branch Manager, FAA Northwest Mountain Regional Office

Enclosure: Area of Potential Effect graphic

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Prepared By: **Mead & Hunt** [www.meadhunt.com](http://www.meadhunt.com)

Enclosure 1

**Area of Potential Effect**  
Freidman Memorial Airport



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Northwest Mountain Region**  
Colorado, Idaho, Montana,  
Oregon, Utah, Washington,  
Wyoming

Flight Standards Regional Office  
1601 Lind Ave SW., Suite 560  
Renton, Washington 98057

August 9, 2012

Ms. Lori Armstrong  
BLM, Twin Falls District  
400 W. F Street  
Shoshone, ID 83301

Dear Ms. Armstrong:

The Federal Aviation Administration (FAA) and the Friedman Memorial Airport Authority (Authority) are preparing an Environmental Assessment (EA) to evaluate potential impacts of introduction of turbojet passenger service to Friedman Memorial Airport (Airport). This Proposed Operational Specification amendment involves a one-for-one replacement of the existing Embraer EMB 120ER Brasilia with the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats, resulting in a shift from providing 3 to 6 flights per day with the smaller aircraft to per day to 2 to 3 flights per day with the CRJ700. This would result in a net decrease in operations and no construction or property acquisition would occur as a part of this project. A study area has been defined for the purposes of assessing environmental impacts. A graphic showing the study area is attached as Enclosure 1. The FAA is the lead Federal agency for the proposed project. The Authority is the Airport sponsor.

We are contacting you as part of our environmental review process. With this letter the FAA is seeking input on concerns from BLM related to the proposed introduction of turbojet service. We would be pleased to discuss details of the Airport's proposed project with you.

#### Project Information

The Airport is owned by the City of Hailey and Blaine County and is operated by the Friedman Memorial Airport Authority. The Authority proposes to permit introduction of turbojet service to replace existing scheduled passenger service using turboprops. More specifically, existing scheduled service using Embraer EMB 120ER Brasilia would be replaced with service by the Bombardier CRJ700ER. The Brasilia is a twin-engine turboprop aircraft with 30 passenger seats while the Bombardier CRJ700ER is a twin-engine jet aircraft with 65 passenger seats (as configured for SkyWest operating as Delta Connection).

SkyWest would shift from providing 3 to 6 flights per day to 2 to 3 flights per day. The greater seating capacity of the CRJ700ER (65 seats as configured for Delta Connection)

compared to the Brasilia (30 seats) makes it possible to meet existing and forecast demand with fewer aircraft. The shift in aircraft types would occur within the next 6 months. The specific Federal action proposed is issuance of amended Operations Specifications to SkyWest to permit introduction of scheduled passenger service using the CRJ700ER. The amendment will identify the aircraft to be used, the operations authorized and any limitations, deviations or exemptions. The FAA will review the change to ensure that the proposed operating procedures meet the agency's safety standards.

The proposed action would not require any construction or property acquisition. Existing facilities are adequate to accommodate the aircraft and associated passengers. Existing arrival and departure flight tracks southeast of the Airport would continue to be used. Due to operating limitations of the CRJ700ER no arrivals or departures northwest of the Airport would be conducted. Noise contours prepared for the Environmental Assessment indicate that the project would cause both existing and forecast annual noise contours to shrink slightly. Due to the lack of construction or property acquisition associated with this project, no cultural resources field investigations were undertaken.

If you wish to provide comments related to this proposed project, please contact Norman LeFevre at [Norman.b.lefevre@faa.gov](mailto:Norman.b.lefevre@faa.gov) or at 425-917-6780.

Your timely response will greatly assist us in incorporating your concerns into the environmental review process.

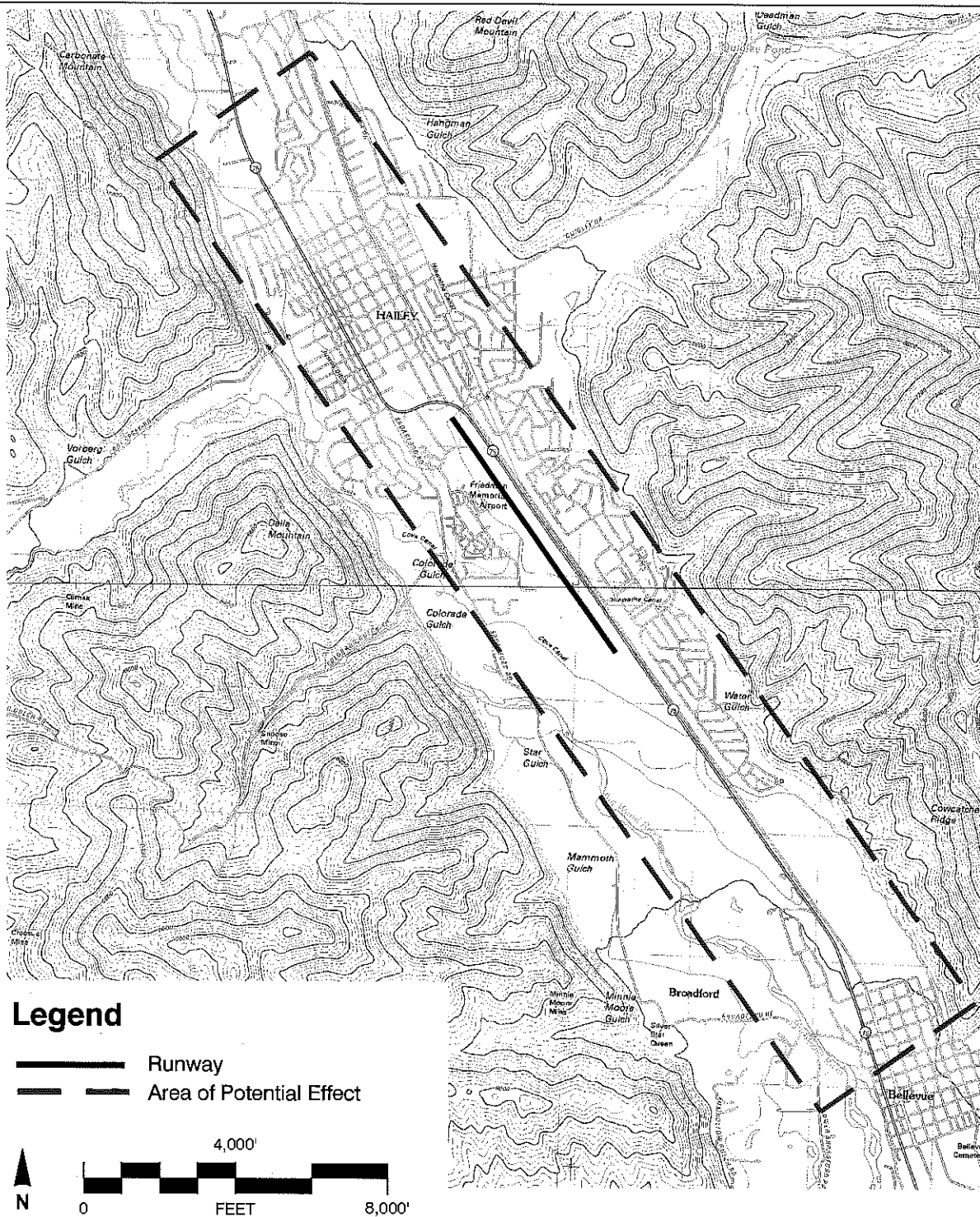
Sincerely,

A handwritten signature in cursive script that reads "Norman LeFevre".

Norman LeFevre  
NextGen Branch Manager, Northwest Mountain Region

Enclosure: Study Area graphic

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Prepared By: **Mead & Hunt** [www.meadhunt.com](http://www.meadhunt.com)

Enclosure 1

## Area of Potential Effect

Freidman Memorial Airport

APPENDIX **C**

**FEDERAL AVIATION ADMINISTRATION'S  
RESPONSE TO COMMENTS**

**Comment**  
**Scott & Stephanie Chamberlain**

**Response**  
**FAA**



**FW: Draft Environmental Assessment Report**  
Rick Baird to Caroline Poyurs, Brad Rolf  
(Brad.Rolf@meadhunt.com)

10/09/2012 02:12 PM

cc: April Dieter

Hi Caroline and Brad:

EA comment for your use. Thank you, Rick.

**From:** Scott Chamberlain - MO [mailto:Scott.Chamberlain@berkadia.com]  
**Sent:** Tuesday, October 09, 2012 3:10 PM  
**To:** Rick Baird  
**Subject:** Draft Environmental Assessment Report

Mr. Baird,

This is Scott and Stephanie Chamberlain and we live at 106 Cochise Drive, Hailey, ID 83333. We have reviewed the draft Environmental Assessment Report for adding regional jet service at Friedman Memorial Airport in Hailey. After carefully reviewing the report we are in full support of adding regional jet service at the airport. The sooner the better. As you know, the reliability of the airport service into Hailey is important to all concerned (residents, business, tourism).

Sincerely,

Scott Chamberlain  
Stephanie Chamberlain


1. The FAA thanks you for your comment.

**Comment**  
**Chris Cummings**

**Response**  
**FAA**



**FW: Comment on EA for the Initiation of Turbojets into Friedman Memorial Airport, Hailey Idaho (KSUN)**

**Rick Baird**  Caroline Poyurs, Brad Rolf  
(Brad.Rolf@meadhunt.com)

10/09/2012 07:59 PM

Cc: April Dieter

Hi Caroline and Brad:

EA comments for your use. Thank you, Rick.

**From:** Chris Cummings [mailto:chris@smithoptics.com]

**Sent:** Tuesday, October 09, 2012 5:00 PM

**To:** Donna Serrano; Rick Baird

**Cc:** Cayla.Morgan@faa.gov; allison.M.anderson-McBride@faa.gov; norman.b.lefevre@faa.gov

**Subject:** RE: Comment on EA for the Initiation of Turbojets into Friedman Memorial Airport, Hailey Idaho (KSUN)

1 Hello Mr. Baird, as a resident of the valley for 15 years I agree with Donna that you must find a viable solution for reliable service to the valley. The current location and it's constraints, weather, geography, and impact upon a community that has grown around the current location, are not it. I have lived in Woodside when several years ago highway relocation and condemning homes in Woodside by eminent domain was on the table. Now I live in Chantrelle, and it appears that the crosshairs have now moved ... looking to expand south, it seems I cannot escape this calamity, and that the South Valley is bound to pay the price of a select few that can't seem to tolerate reliable air service with an additional 15-20 minute commute.

The goal from my understanding has been to provide reliable air service to the valley. No amount of expansion or technology can "fix" this where the airport is currently located when weather sets in. If you stand for the reliable air service to this community, you must look at an alternative site, to the South of this community and do so soon. The community of Hailey and Bellevue have voiced their opposition to expansion, clearly. It is time someone starts listening to the majority stakeholders in the valley, it's residents and workforce, which to no surprise reside in the greatest area of impact with proposed expansion to the current site no matter which you try to expand.

2 I live in Chantrelle, and knowingly live with the "here and now" of the airport in it's current configuration, and smaller commercial planes. I do not support larger aircraft, more noise, more pollution, and more pass the "hurt" to the residents of the South Valley. We know what this expansion means, and we do not want it. Two weeks of Allen and Co flying over my house while my then 15 month old daughter tries to sleep, and is woken by the windows rattling in my house from larger jets pulling up, make that very clear. I only wish I had the video of it to send you so you can more clearly see the impacts of what you propose.

Respectfully,

chris cummings

1. As stated in section 1.2 of the Final EA, following the 2004 FMA Master Plan Update, an EIS was initiated to investigate the impacts of the FMA's replacement airport. During that EIS process, issues related to wildlife matters arose and the costs associated with the alternative sites for the replacement airport increased beyond what was expected. This raised feasibility concerns for the project's advancement. Given these issues, the FAA indefinitely suspended the Draft EIS in August 2011 and currently, the status of the EIS remains suspended. It should be noted that the stalled EIS for the alternative site of FMA and the current study looking at the existing site of FMA, as mentioned in the section 4.21 of the Final EA, are both independent of the current proposal for Skywest to replace their EMB120 service with the CRJ700ER service.

2. As shown in section 4.15, given the smaller number of proposed flights with the CRJ700ER over the current EMB-120 service, the noise impact of the proposed Skywest CRJ-700ER service would actually be less than the current noise impact.

## Comment

Fritz Haemmerle - City of Hailey – Office of the Mayor

City of Hailey

115 MAIN STREET SOUTH, SUITE H  
HAILEY, IDAHO 83333

OFFICE OF THE MAYOR

(208) 788-4221  
Fax: (208) 788-2924

October 12, 2012

Mr. Richard R. Baird  
Airport Manager  
Friedman Memorial Airport  
P.O. Box 929  
Hailey, ID 83333

Dear Mr. Baird

Please consider the following comments from the City of Hailey on the Environmental Assessment ("EA") for the Initiation of TurboJet Service for Friedman Memorial Airport.

- ① Section 14.5 addresses noise in and around the airport from the Proposed Action. Figure 4-4 and Figure 4-5 (pp. 23-24) presents 65, 70 and 75 Day-Night Average Sound Level ("DNL") noise contours for 2012 with and without the Proposed Action. The two sets of contours are almost identical and are largely contained within the Airport's property boundary. It is unclear from the analysis however, if the noise analysis for the Proposed Action was based on 3 flights and the noise analysis for the No Action was based on 6 flights – using the seating capacity, or if some other frequency of flights comparison was used.
- ② The EA should be clear about the difference in noise impacts from a single landing/take-off with the Embraer EMB 120ER Brasilia (a 30-passenger turboprop) and the Bombardier CRJ700ER, (a twin-engine jet aircraft with 65 passenger seats). In other words, we believe the EA should compare the noise impacts of the two aircraft with a single take-off and landing so that the reader can understand if the Bombardier is more, less, or equal in noise impacts to the Embraer.
- ③ It is also important that the EA disclose that frequency of flights may change with approval of the Bombardier, other than the three flights/day forecasted. This is no different than what can occur with any of the existing approved aircraft into Friedman Memorial Airport. At any time, a commercial carrier may choose to increase or decrease flights of approved aircraft based on many factors. But, the EA is not clear that this potential for increased Bombardier flights exists with the approval of the Proposed Action.
- ④ Overall, the City of Hailey generally supports the EA. Our comments are merely intended to clarify the EA. If you have any questions, please contact me. Thank you.

Sincerely,



Fritz X. Haemmerle  
Mayor

## Response

FAA

1. As detailed in Section 4.16, the reduction in the proposed number of flights with the CRJ 700ER is a result of expectation that the number of passengers (enplanements) is not going to change. Therefore given the larger seating capacity of the CRJ700ER with respect to the EMB120 SkyWest is proposing to reduce the number of flights in and out of FMA. As stated in section 4.15, the no action noise contours were based on the 2012 TAF. The proposed action contours were also based on upon the same numbers, but substituting the smaller number of CRJ700s that would support the number of enplanements that the EMB120 currently services for Skywest. This methodology was double checked against Skywest's statement that they expect a peak season level of operations to be 3 daily flights as opposed to the current season peak of 6 daily flights. Section 4.15 has been slightly expanded to clarify this.

2. Your request is that the noise impacts of the Proposed Action and the No Action Alternative are also represented in a single event noise metric, rather than only being expressed through an average daily noise metric. However, as mentioned in Section 4.15 - The Federal Interagency Committee on Noise (FICON) found that the Day-Night Average Sound Level (DNL) is the recommended metric to be used to quantify noise impacts. As such the FAA quantifies criteria of significance in terms of the DNL and in no other metric. Therefore, the comparison of single events between the EM120 and the CRJ700ER would not be helpful in understanding the noise impact of the proposed verses the no action alternatives.

3. The disclosure that the amendment of an Airline's Operational Specifications does not limit the Airline to any given frequency of operations has been included in section 1.1 of the FEA. However, it should be noted that the actual noise contours were based upon the TAF, and not on the level of service as provided by Skywest.

4. The FAA thanks you for your comment.

**Comment**  
**Jay Hagenbuch**

**Response**  
**FAA**



**FW: CRJ 700**

**Rick Baird** (Brad.Rolf@meadhunt.com), Caroline Poyurs

09/26/2012 12:35 PM

April Dieter

Hi Brad and Caroline:

FA comment for your use. Thank you, Rick.

**From:** Jay Hagenbuch [mailto:jay@hagenbuch.com]

**Sent:** Wednesday, September 26, 2012 1:29 PM

**To:** Rick Baird

**Subject:** CRJ 700

Dear Rick--

☐ This is a letter in strong and complete support of the plan to fly CRJ 700 jets in and out of the Friedman Memorial Airport. I hope that the FAA approves this as soon as it possibly can.

Best regards,

Jay Hagenbuch  
208-726-1579

1. The FAA thanks you for your comment.

**Comment**  
**John Pluntze**

**Response**  
**FAA**



**FW: EA For Larger SkyWest Planes**

**Rick Baird** to Brad Rolf (Brad.Rolf@meadhunt.com), Caroline Poyurs

09/15/2012 09:15 AM

cc: April Dieter

History This message has been replied to.

Hi Brad and Caroline:

This e-mail is forwarded for you records and use. Thank you, Rick.

**From:** John Pluntze [mailto:lovesbiking2001@yahoo.com]

**Sent:** Friday, September 14, 2012 2:02 PM

**To:** Rick Baird

**Cc:** John

**Subject:** Re: EA For Larger SkyWest Planes

Hi, Rick!! John Pluntze here in Ketchum.

Well, after reviewing the EA regarding allowing larger SkyWest planes into Friedman Airport, I don't see any reason to take issue with the proposal. In fact, since the planes that SkyWest wants to use at your airport have considerably more seats than the current ones do, I think granting SkyWest's very reasonable request would result in potentially many more people using SkyWest out of Friedman (since, as it stand now, trying too find an available seat on SkyWest OTHER than during "slack" season periods can often be a very difficult thing to do.

Really hope the larger SkyWest planes ARE approved for use at Friedman Airport.

Hope you have a good weekend 9and week), Rick!! :)

Sincerely,

John Pluntze  
(Ketchum)

1. The FAA thanks you for your comment.

**Comment**  
**Scheryl Schowengerdt**

**Response**  
**FAA**



**FW: EA comment**

**Rick Baird** o Caroline Poyurs, Brad Rolf  
(Brad.Rolf@meadhunt.com)

10/12/2012 06:48 PM

Cc: April Dieter

Hi Caroline and Brad:

EA comment for your use. Thank you, Rick.

**From:** Sheryl Schowengerdt [mailto:sheryl.schowengerdt@gmail.com]

**Sent:** Friday, October 12, 2012 5:17 PM

**To:** Rick Baird

**Subject:** EA comment

Mr. Baird,

As I read the September 10, 2012 Draft Environmental Assessment for the Initiation of Turbojet Service for Friedman Memorial Airport, Hailey, Idaho, I was puzzled by the description of the land surrounding the airport.

In both Chapter 1 Background and "Inventory," and Chapter 4 Affected Environment and Environmental Consequences, the area south and southeast of the airport is defined as agricultural land use. Yet, it's abundantly clear in Figure 4-1 Existing "Land" Uses that the area directly southeast is a combination of residential and institutional land use with commercial and public facilities directly south of the homes for approximately .75 miles before the agricultural area east of the highway begins. In fact, the land to the southeast designated as agricultural use extends only .75 miles before reaching the residential and commercial properties located in the NW end of the City of Bellevue 1.5 miles southeast of the airport (not 2 miles as described in the EA).

Defining these areas as agricultural land use does not accurately describe the community surrounding the airport and seemingly dismisses any impact on local residents that may result from the proposed change.

--

Sheryl Schowengerdt  
208-720-6534

1. The Final EA (FEA) has been revised to account for the residential land use south of FMA. As shown in figure 4-4 in the FEA, the 65 DNL contour does not extend south of the airport property. Therefore, as detailed in Section 4.5 (compatible land use) of the FEA, none of the analysis in the FEA needs to be revisited as a result of this oversight.

**Comment**  
**Donna Serrano**

**Response**  
**FAA**

From: ANM-SEA-ADO, Seattle, WA  
To: "Rick Baird" <Rick@flyfma.com>  
Cc: Cayla Morgan/ANM/FAA@FAA, Allison M Anderson-McBride/AWA/FAA@FAA, Norman B LeFevre/ANM/FAA@FAA  
Date: 10/09/2012 03:10 PM  
Subject: Comment on EA for the Initiation of Turbojets into Friedman Memorial Airport, Hailey Idaho (KSUN)

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My name is Donna Serrano. I am a 10-year resident of Bellevue, Idaho, living in the Chantrelle subdivision, which is 1.4 miles from the southern end of Hailey, Idaho's Friedman Memorial Airport (FMA). Having reviewed the current EA, for the Initiation of Turbojet Service at Friedman Memorial Airport, I find I have some concerns about some of the conclusions and statements contained within the EA.

Section 1.2: This section correctly reports that of the two cities next door to FMA, the City of Bellevue has a population of just under 2300 people, Hailey having a population of just under 8000. This portion of the EA goes on to identify land use for south and southeast of the airport into one category: 'agricultural land use'. That is not accurate. Each direction needs to be evaluated separately; land use south is vastly different from the southeast.

The area southeast has agricultural land use, but it also mixed with residential. However, it should be noted that directly south of the airport, less than 1.5 miles from the southern end of airport property, begins the Chantrelle subdivision, having between 70-80 homes! Clearly residential! And, the residential portion of Bellevue continues from that point on to the south, as well as southeast. I find it difficult to understand how south and southeast could be combined into one category and actually be identified as agricultural. To further emphasize the error of this 'agricultural' designation is that of the combined population Hailey and Bellevue, 20% of those people live in the City of Bellevue! The entire City of Bellevue itself is under the direct flight path of all incoming and departures at FMA, including the CRJ700, CRJ900 and Category C-III planes put forth in this EA. It is clear that Bellevue, and its citizens south of the airport are in the most heavily impacted area of airport operations, more so than any city in the Wood River Valley. To be summarily labeled as agricultural clearly does not present the reality of this situation and needs to be corrected.

1. The Final EA (FEA) has been revised to account for the land use differences between the area south and southeast of the airport. As shown in figure 4-4 in the FEA, the 65 DNL contour does not extend south of the airport property. Therefore, as detailed in Section 4.5 (compatible land use) of the FEA, none of the analysis in the FEA needs to be revisited as a result of this oversight.

Page 3 of the EA states the recent history of airport operations. It is difficult to wrap my mind around the fact that for 27 years, *not months*, but *years*, the airport board has been discussing and spending enormous amounts of money on the same unresolved topics: options for alternatives, modifications, relocation and various methods of improving service. In 1985, it was recognized that solutions 'to correct FAA discrepancies were considered extreme' and yet, 27 years later, we continue to go in circles, wasting valuable time along with millions and millions of dollars on something as far back as 1985 was recognized for what it was.

*What has changed in 27 years?* The Wood River valley population has vastly increased, homes and subdivisions have been built, businesses have sprung up and more schools and hospitals have been built. More compelling, for the past ten years, including the boom years, enplanements into FMA have steadily declined, year after year after year. *What hasn't changed?* The mountains are still here, the weather is still mountain weather, reliability is still causing big percentages of plane diversions, and most importantly, movement to a viable solution has not happened. Resolution to the inherent airport issues is no further ahead than in 1985. No private industry would have ever operated, let alone survived, in such a manner.

In 2004, according to the information presented on Page 3, last paragraph of the EA, the Master Plan was once again 'updated' and developments 'necessary to meet long-range (20-year) airport requirements' were looked at. Alarming that that 20-year window is just a little over ten years distant. What has been solved since that 2004 statement, what has been accomplished in the these past eight (8) years. Nothing! Sadly, they are still no further ahead than they were in 1985 but instead of FMA thriving today, they are still in decline after spending an additional \$7 Million dollars!

I have no expertise to question the findings of Mead and Hunt, none whatsoever. Let's be clear on that. But, I do find it of concern that back in July (2012) an issue came to the surface involving some of the airport board members. That issue was reported on by our local newspaper, the Mountain Express. All of those quoted in the newspaper article below also happen to be Blaine County Commissioners as well as Airport Board members. Tom Bowman serves as Chairman of the Airport Board. The aviation consulting firm, T-O Engineers had been commissioned by the Airport Board (FMAA) to study the various situations at FMA, draw conclusions and report on their findings. Because the results of T-O Engineer, Dave Mitchell, didn't match the 'expectations' of commissioners/board member Larry Schoen, he spoke up and asked that the 'negative language' be *softened* to reflect a more positive tone. Others concurred and indicated that they, as board members, should decide, rather than the Aviation Engineers, if something is 'too difficult or too expensive'. (It should be noted that T-O Engineers continues to work with FMAA). Those comments were reflected in the July 4 issue the Mountain Express. A excerpt from that article, along with the link for the entire report, follows:

<http://www.mtexpress.com/index2.php?ID=2005142784> July 4, 201.... Commissioners leery about airport contract language  
Commissioner Larry Schoen said during a meeting of the Board of County Commissioners that a draft scope of work outlining what sort of alternatives aviation consultants T-O Engineers would be studying already shows a bias against certain options.  
"The type of language I am talking about is peppered throughout the document," Schoen said. "It makes statements like, 'Choosing this alternative will be very difficult and expensive to accomplish.' Language like that just makes me uncomfortable."

2. The EA acknowledges all the previous effort that has gone into alleviating the issues surrounding the operation of FMA – up to and including the process that resulted in the stalled EIS for the replacement airport and the current effort to re-assess what can be done now. It should be noted, however, that the proposed action is independent of what happens to the FMA. Skywest is changing over their fleet. It is expected that given the slightly faster flight times of the CRJ700ER over the EMB120, that the reliability of service into FMA may improve with the CRJ700ER..3. The decision of whether or not to amend Skywest's Operating Specification (OpSpecs) is made as a result of the combination of two separate processes. FAA evaluates the safety impacts of the proposed OpSpecs in accordance with FAA laws and regulations. This, in part has already been done resulting in the Letter of Agreement between FMA and the contract Air Traffic Control Tower, as outlined in Section 1.2 of the Final EA. In a separate process, FAA considers the environmental impacts of the proposed action to determine whether the action will result in significant environmental impacts in accordance with the National Environmental Policy Act (NEPA) as required under FAA Order 1050.1E. The evaluation of the environmental impact of the proposed OpSpecs includes the impact analysis of 19 different environmental impact categories. As required by law, the FAA investigated each of those 19 environmental impact categories in order to ascertain if the Proposed Action would result in a significant environmental impact, according to federally mandated criteria of significance. As a result of the FAA's investigation no category had a significant environmental impact. Please note that both the safety and environmental portions of this process are governed by federal regulations defined by specific criteria..

*Commissioners Tom Bowman and Angenie McCleary added that they felt any decisions regarding whether certain alternatives would be too difficult or expensive should be left with the board—not with Mitchell.*  
*"It's not that [Mitchell] did bad work, it's just that he doesn't need to make those conclusions," Bowman said. "We need to take the heat on that."*

My concern: I am trusting that Mead & Hunt didn't receive the same request as T-O Engineers did when Mead & Hunt prepared this EA for the addition of the above-mentioned planes at Friedman Memorial (KSUN). Further, I am trusting that those submitting cost projections for the eight alternatives that FMA will present to the FAA in Renton October 23, did not receive a similar request.

Someone, some agency, some leader must step forward and terminate the further waste of time and the continued squander of irreplaceable revenues. Don't waste another year on trying to 'fix' something that can't, and shouldn't, be fixed. Focus, instead, solely on relocating this airport. No more EAs, no more expenditures for 'fixes', no more money wasted on 'improvements', no more money wasted on modifications, no more continual studies on new service when enplanements have eroded and are minuscule when compared to other ski resorts. Nothing should be done at FMA, no monies should be spent, for any reason. Spend time and money wisely and prudently for the sole purpose of relocating this airport to a safer and more expandable location, an airport that will generate more revenues and more reliable air service. All the data certainly indicates relocation is the only sensible and fiscally responsible solution. Who will stand up and do what is right? When?

The "cost projections for the eight alternatives to be presented on the FAA on Oct 23<sup>rd</sup>" mentioned in the comment, is likely related to the on-going 90-day study, funded by the FAA in order to determine how much it would cost for FMA to meet standards at the existing site, as mentioned in Section 4.21 of the FEA. There is an Oct 23<sup>rd</sup> progress report meeting for this project. However, it should be noted that this study is independent of the Proposed Action.

4. The proposed Action is independent of any effort to "fix" the airport. Furthermore, it should be noted that no public money is being spent in association with Skywest's request for an OpSpec Amendment to allow the CRJ700 to fly in and out of FMA.

**Comment**  
**Chuck Smith**

**Response**  
**FAA**



FW: CRJ700 jets and FMA...  
Rick Baird to Caroline Poyurs, Brad Rolf  
(Brad.Rolf@meadhunt.com)

10/09/2012 08:23 AM

April Dieter

Caroline and Brad:

EA comment for your use. Thank you, Rick.

-----Original Message-----

From: Charles Smith [mailto:chucksmith208@gmail.com]  
Sent: Saturday, October 06, 2012 3:42 PM  
To: Rick Baird  
Subject: CRJ700 jets and FMA...

Hello Mr. Baird,

As a full-time resident of Sun Valley and business owner in Ketchum, I would like to express my support concerning the approval of commercial flights utilizing CRJ700 jets by SkyWest Airlines at Friedman Memorial Airport. More efficient and higher capacity aircraft are required for the successful growth of this community and the financial health of an airline serving this community. (The numerous proposals regarding expansion of the airport are a separate issue that I will not address in this email.) It is my understanding that the CRJ700 jets could operate with little or no changes to the airport. I encourage all parties involved to grant approval to SkyWest's application.

Sincerely,

Chuck Smith  
Sun Valley

1. The FAA thanks you for your comment.

**Comment**  
**Evan Lister Stelma**

**Response**  
**FAA**

Evan Lister Stelma  
P.O. Box 84  
Bellevue, ID 83313  
(208) 788-9421

To: Norman B. Lefevre  
Cc: Allison Anderson-McBride, Cayla Morgan, Richard Baird  
RE: Comments on EA for the Initiation of Turbojet service into Friedman Memorial Airport

My name is Evan Lister Stelma and my husband, Bart Lassman, and I have lived in Bellevue, Idaho in the Chantrelle subdivision for over a decade. As our neighborhood and home are directly south of the Friedman Memorial Airport 1.5 miles, we are reminded daily of the proximity of the airport. I would like to comment on my concerns about the conclusions and statements that are contained within the newly released EA for the Initiation of Turbojet service into Friedman Memorial Airport (KSUN).

①

First of all, in outlining the surrounding land uses for the existing SUN properties, the land south of the airport was deemed to be all agricultural. This is far from the truth. The city of Bellevue, with 2300 residents and many more in the unincorporated Blaine County adjoining land, live less than one and a half miles from the airport. Every flight, in or out of Friedman, flies over the homes of the City of Bellevue and the county in the regular approach to land or depart from our geographically constrained (very narrow) valley. Only in the rare case of strong winds from the south/southeast do the flights deviate from this path and land from the northwest, low over the City of Hailey and its schools, nursing homes, fire stations and other high occupancy buildings. Notwithstanding, are Hailey's impacted 7500 plus residents who hear every single take off and landing either way.

②

Those of us who live in the southern part of Blaine County did so with the understanding that the airport is a vital part of our resort community, however, with the caveat that it would not increase in size, but instead, move to a different location outside of our constrained and very narrow valley in order to bring the necessary reliability to winter and inclement weather operations. The FMAA Board has been working on the relocation process for 27 years, and up until the summer of 2011, it appeared as though a suitable location had finally been found. The process was several years underway with the EIS at the new site, some twenty miles south of the current airport, when all of a sudden things came to a screeching halt. Seven million dollars and a sage grouse sighting later, the FAA has put the relocated new airport EIS and any resulting new facility, on hold. Rapidly escalating costs (\$340 million was quoted) and the possibility that the sage grouse might be listed on the Endangered Species list effectively stopped the process. Now we are back to square one. Again.

③

It's time to stop making modifications and get the airport out of this valley and away from the homes and people that it impacts daily. A large, modern and reliable facility is what this whole County needs to help revitalize air traffic for the commercial providers who fly in to SUN and for the community which relies on it for transportation. Reliability is the key component and the item which cannot be "Fixed" by MODS or quick solutions.

1. The Final EA (FEA) has been revised to account for the residential land use south of FMA. As shown in figure 4-4 in the FEA, the 65 DNL contour does not extend south of the airport property. Therefore, as detailed in Section 4.5 (compatible land use) of the FEA, none of the analysis in the FEA needs to be revisited as a result of this oversight.

2. As stated in section 1.2 of the Final EA, following the 2004 FMA Master Plan Update, EIS was initiated to investigate the impacts of the FMA's replacement airport. During that EIS process, issues related to wildlife matters arose and the costs associated with the alternative sites for the replacement airport increased beyond what was expected. This raised feasibility concerns for the project's advancement. Given these issues, the FAA suspended the Draft EIS in August 2011 and currently, the status of the EIS remains suspended. However, it should be noted that the current proposal for Skywest to replace their EMB120 service with the CRJ700ER service is independent of the suspended FMA relocation effort.

3. Given that the effort to relocate the FMA is indefinitely stalled for fiscal reasons, the FAA has commissioned a 90 day study in order to determine how much it would cost for FMA to meet standards at the existing site. As before, please note that this study is independent of the current proposal for Skywest to replace their EMB120 service with the CRJ700ER service.

④

A memo dated April 29, 2009 from Jason Pitts, Manager Western Flight Procedures Office was written to Environmental Protection Specialists, Seattle District Office, SEA-632 titled "Feasibility of Technological Improvements to Approaches at the Existing Airport". In that memo multiple procedures, landing systems and new technologies were explored to see if the minimums could be lowered by any means to increase the reliability of commercial flights making a successful landing at SUN. The final outcome of all the exploration of all systems as well as a new RNP northern approach is summed up in the memo as follows: "In short, there is simply no option or combination of options that will allow the approach. Finally, the request to develop procedures at SUN from the North was submitted to the Regional Airspace Procedures Team (RAPT). The RAPT is the governing body that approves and/or disapproves all such actions. After discussion on the feasibility of the proposal and discussion on the safe and efficient use of airspace, the RAPT disapproved any further action on approaches to SUN from the North."

⑤

Chapter 3, Section 3.2 Proposed Action of the EA notes the following: "SkyWest is seeking to replace passenger air service using Embraer EMB120ER Brasilia with service by the Bombardier CRJ700ER. This change is the result of SkyWest's strategy of reducing its use of turboprops. This is of particular importance at the FMA, where it is expected that the proposed CRJ700 service would be more reliable than the current EMB120 service." Weather, mountains and the FAA's own consulting engineers have continually reported that reliability cannot be safely improved. What has changed that the authors of the EA now are proposing that the introduction of larger jets into the commercial fleet will improve the reliability? The residents of the neighboring towns of FMA deserve to know the answer to this question as they will be the first impacted if safety is compromised.

⑥

After reviewing the Friedman Memorial Airport (SUN) Modification to Existing Letter of Agreement Safety Risk Management Document which initiated this EA, it was noted that the aircraft that the local citizens had been told would be the only jet authorized by the EA (SkyWest CRJ700ER) to land under the MODS with the air traffic control tower, weren't. In fact, the LOA with the SUN tower makes it clear that "ALL Scheduled Commercial Approach Category C Aircraft will be allowed to land at Friedman under this LOA. It's a very interesting update that certainly will change the parameters on noise and pollution from de-icer and exhaust, which will only ramp up as the larger jets of the Approach Category C field are implemented for the new routes now under consideration by FMA. This airfield, sited within the midst of a severely terrain challenged valley, has no business bringing in planes larger than the RJ700ER.

⑦

In closing, it is time to stop pouring money into an airport which cannot "grow" its way out of the predicament of being located in a high mountain box valley. Terrain and weather are items which cannot be fixed, according to the FAA's own people. Pretending that the constraints don't exist won't work any longer. For the safety of the citizens of the Wood River Valley, the Friedman Airport and the flying public who want to arrive on time and safely, please restart the EIS on the replacement airport at site 10A. Seven million dollars has been spent so far on the EIS, throwing another \$300 million bandage on to try to "fix" the current FMA and its deficiencies without any room for the future or addressing reliability issues, is crazy. A \$40 million difference for the existing airport which has no growing room or a brand new facility without the reliability issues and unlimited potential for expansion? There is no question. Don't spend one more dime on Friedman Memorial Airport in the present location between the towns of Hailey and Bellevue.

Thank you,

Evan Lister Stelma  
elstelma@svskylan.net

4. The long term solution for FMA is independent of the proposed action discussed in this EA.

5. Prior to a flight taking off from Salt Lake City, the weather forecast at Hailey is reviewed and the decision is made to divert the plane to Twin Falls and then bus the passengers to Hailey or not. Given the shortened flight times of the CRJ700ER over the EMB120, this decision will be based on more accurate weather information. Skywest has stated that this is expected to remove some of the current diversions thereby safely increasing reliability.

6. Any time an operator wishes to service an airport with an aircraft when they have never serviced that particular airport with that particular aircraft before, they would need to request an amendment of their Operational Specifications from the FAA. Once the FAA receives such a request, in addition to ensuring that the requested operation would be safe, the FAA is required to undertaken an environmental review of the proposal, under the National Environmental Policy Act (NEPA). During this NEPA process, air quality and noise impacts of the proposed new operations in and out of SUN would be investigated for significance. Therefore any additional schedule commercial approach category C aircraft would be analyzed for significant environmental impacts prior to be granted authorization to operate out of FMA.

7. As stated earlier, and in section 1.2 of the Final EA, following the 2004 FMA Master Plan Update, EIS was initiated to investigate the impacts of the FMA's replacement airport. During that EIS process, issues related to wildlife matters arose and the costs associated with the alternative sites for the replacement airport increased beyond what was expected. This raised feasibility concerns for the project's advancement. Given these issues, the FAA suspended the Draft EIS in August 2011 and currently, the status of the EIS remains suspended. However, it should be noted that the current proposal for Skywest to replace their EMB120 service with the CRJ700ER service is independent of the suspended FMA relocation effort.