FINAL ENVIRONMENTAL ASSESSMENT

Land Acquisition Final Environmental Assessment, DOT Section 4(f) Evaluation, and Aviation Development

July 2022

Prepared for the Friedman Memorial Airport (SUN) and the Federal Aviation Administration (FAA)

Prepared by Mead & Hunt

DENVER
1743 Wazee Street, Suite 400
Denver, CO 80202
303-825-8844

Friedman Memorial Airport
Land Acquisition
Final Environmental Assessment DOT Section 4(f) Evaluation, and Aviation Development

This Environmental Assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

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DIANE STILSON
Date: 2022.07.26
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Responsible FAA Official

Date

FRIEDMAN MEMORIAL AIRPORT
SUN

FINAL ENVIRONMENTAL ASSESSMENT

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Acronyms

(Sorted alphabetically)

2018 MPU – 2018 Master Plan Update
AC – Advisory Circular
ACAIS – Air Carrier Activity Information System
AEDT – Airport Environmental Design Tool
AIP – Airport Improvement Program
ALP – Airport Layout Plan
APE – Area of Potential Effect
ARFF – Aircraft Rescue and Firefighting
ATADS – Air Traffic Activity System
BCHA – Blaine County Housing Authority
BMPs – Best Management Practices
CCA – Clean Air Act
CEQ – Council on Environmental Quality
CERCLA – Comprehensive Environmental Response, Compensation and Liability Act
CFR – Code of Federal Regulations
CH4 – Methane
CO – Carbon Monoxide
CRECs – Controlled Recognized Environmental Conditions
CWA – Clean Water Act
dB – Decibels
DNL – Day-night Average Sound Level
EA – Environmental Assessment
EO – Executive Order
EPA – Environmental Protection Agency
ESA – Endangered Species Act
FAA – Federal Aviation Administration
FBO – Fixed Base Operator
FEMA – Federal Emergency Management Agency
FIRM – Flood Insurance Rate Map
FMMA – Friedman Memorial Airport Authority
FPPA – Farmland Policy Protection Act
GHG – Greenhouse Gas
HFCs – Hydrofluorocarbons
HREC – Historic Recognized Environmental Condition
IDEQ – Idaho Department of Environmental Quality
IDFG – Idaho Fish and Game
IDFW-CDC – Idaho Fish and Wildlife Conservation Data Center
IFWIS – Idaho Fish and Wildlife Information System
IHSI – Idaho Historic Site Inventory

IPaC – Information for Planning and Consultation
ITD – Idaho Transportation Department
MBTA – Migratory Bird Treaty Act
MOVES – Motor Vehicle Emission Simulator
MSGP – Multi-Sector General Permit
N20 – Nitrous Oxide
NAAQS – National Ambient Air Quality Standards
NEPA – National Environmental Policy Act
NHPA – National Historic Preservation Act
NO2 – Nitrogen Dioxide
NOx – Nitrogen Oxides
NPDES – National Pollutant Discharge Elimination System
NPIAS – National Plan of Integrated Airport Systems
NRCS – National Resources Conservation Service
NRHP – National Register of Historic Places
NRI – Nationwide Rivers Inventory
NWI – National Wetlands Inventory
O3 – Ozone
Pb – Lead
PFCs – Perfluorocarbons
PM10 / PM2.5 – Particulate Matter
RCRA – Resource Conservation and Recovery Act
REC – Recognized Environmental Condition
RPZ – Runway Protection Zone
RSA – Runway Safety Area
SAFETEA-LU – Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SGCN – Species of Greatest Conservation Need
SHPO – State Historic Preservation Office
SIP – State Information Plan
SO2 – Sulfur Dioxide
SRE – Snow Removal Equipment
SUN – Friedman Memorial Airport
SWPPP – Storm Water Pollution Plan
TAF – Terminal Area Forecast
USACE – United States Army Corps of Engineers
USC – United States Code
USDA – United States Department of Agriculture
USFWS – United States Fish and Wildlife Service
USGCRP – United States Global Change Research Program
USTs – Underground Storage Tanks
VOC – Volatile Organic Compounds
WSS – Web Soil Survey
YBCC – Yellow-billed Cuckoo

Chapter 1

Background/Proposed Action

1. Introduction

The Friedman Memorial Airport (Airport or SUN) is located in Blaine County in the City of Hailey, Idaho (**Figures 1.1** and **1.2**). The Friedman Memorial Airport Authority (FMAA or Sponsor), formed through a Joint Powers Agreement between Blaine County and the City of Hailey, operates and manages the Airport. The Airport is a commercial service airport serving several airlines and general aviation traffic.

The Proposed Action being evaluated in this Environmental Assessment (EA) includes 1) purchase of approximately 386 acres of property south of the Airport and 2) development of 10.4 acres of the acquired property into general aviation hangars, aircraft parking apron, and associated vehicle parking and roadways adjacent to existing Airport facilities. The FMAA is seeking federal funding to assist with the property acquisition and aviation development.

This EA was prepared to identify and disclose the potential environmental impacts associated with the Proposed Action, as well as how such impacts can be avoided, minimized, or mitigated. This EA was prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) Regulations Title 40 Code of Federal Regulations (CFR) §§ 1500-1508 and 1515-1518, and the implementing regulations for NEPA and in accordance with Federal Aviation Administration (FAA) Order 1050.1F *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

1.1 Background and Existing Facilities

SUN is classified as a primary non-hub commercial service airport by the FAA's National Plan of Integrated Airport Systems (NPIAS). The Idaho Transportation Department's (ITD) 2020 Airport System Plan Update identifies SUN as a commercial service airport. Existing Airport property includes approximately 275.33 acres directly south of the City of Hailey's urban core, west of State Highway 75, east of the Wood River, and less than 2 miles north of the City of Bellevue (**Figure 1.2**). The Airport has a single runway, Runway 13/31, which is 7,550 feet long, 100 feet wide, and oriented generally north-south. The Airport also has a full parallel taxiway (Taxiway B) on the west side of the runway and several taxiway connectors. A total of four aprons are available for parking and maneuvering aircraft. The terminal is located approximately 2,800 feet from the northern end of the runway along the western side. Additional Airport facilities include: an air traffic control tower; an airport operations building that houses aircraft rescue and firefighting (ARFF), snow removal equipment (SRE) and Airport administration; fixed-base operator (FBO) hangars; general aviation hangars; automobile parking; and two fuel facilities. The existing Airport layout is illustrated in **Figure 1.3**.

Figure 1.1 Airport Location Map

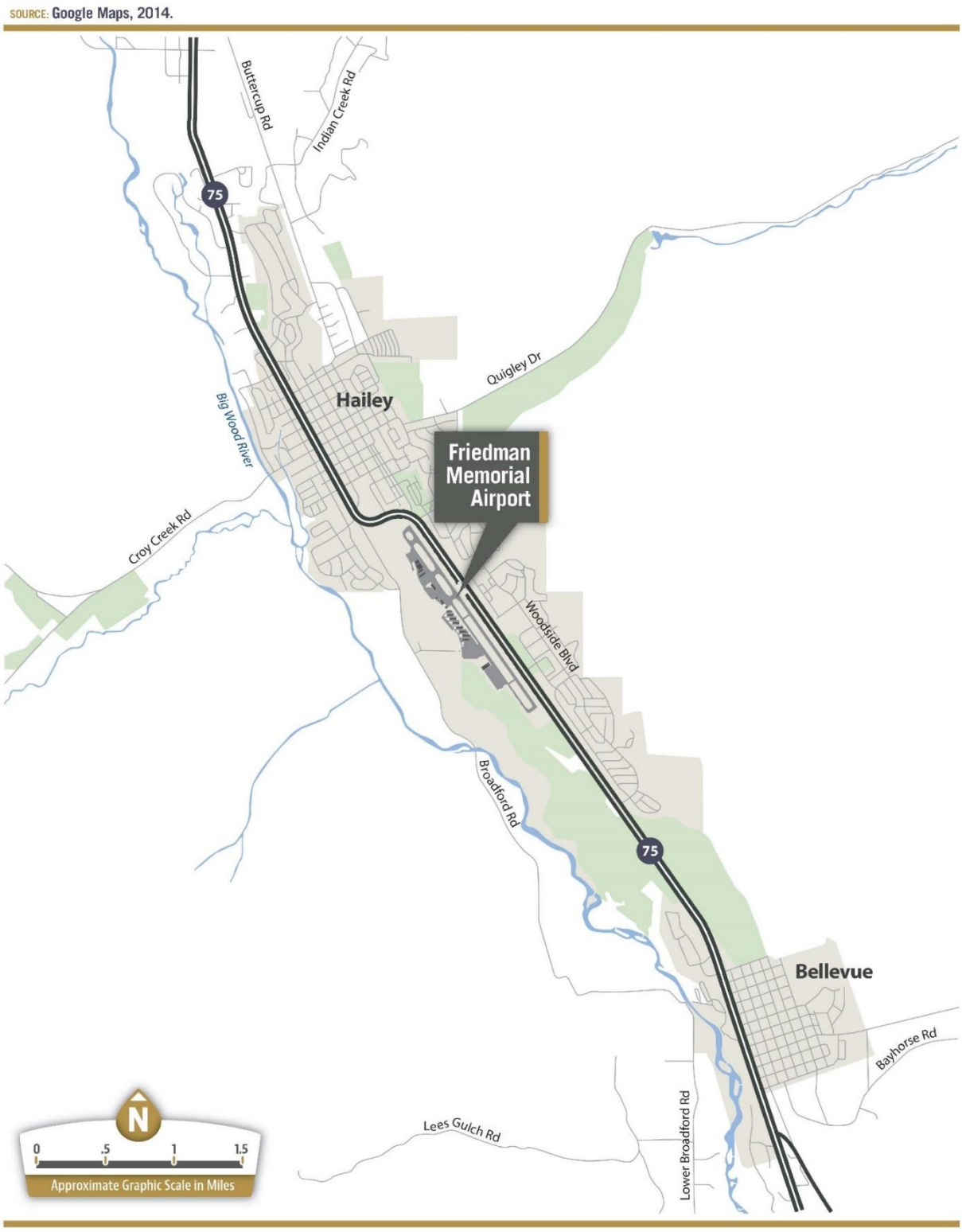

Figure 1.2 Airport Vicinity Map

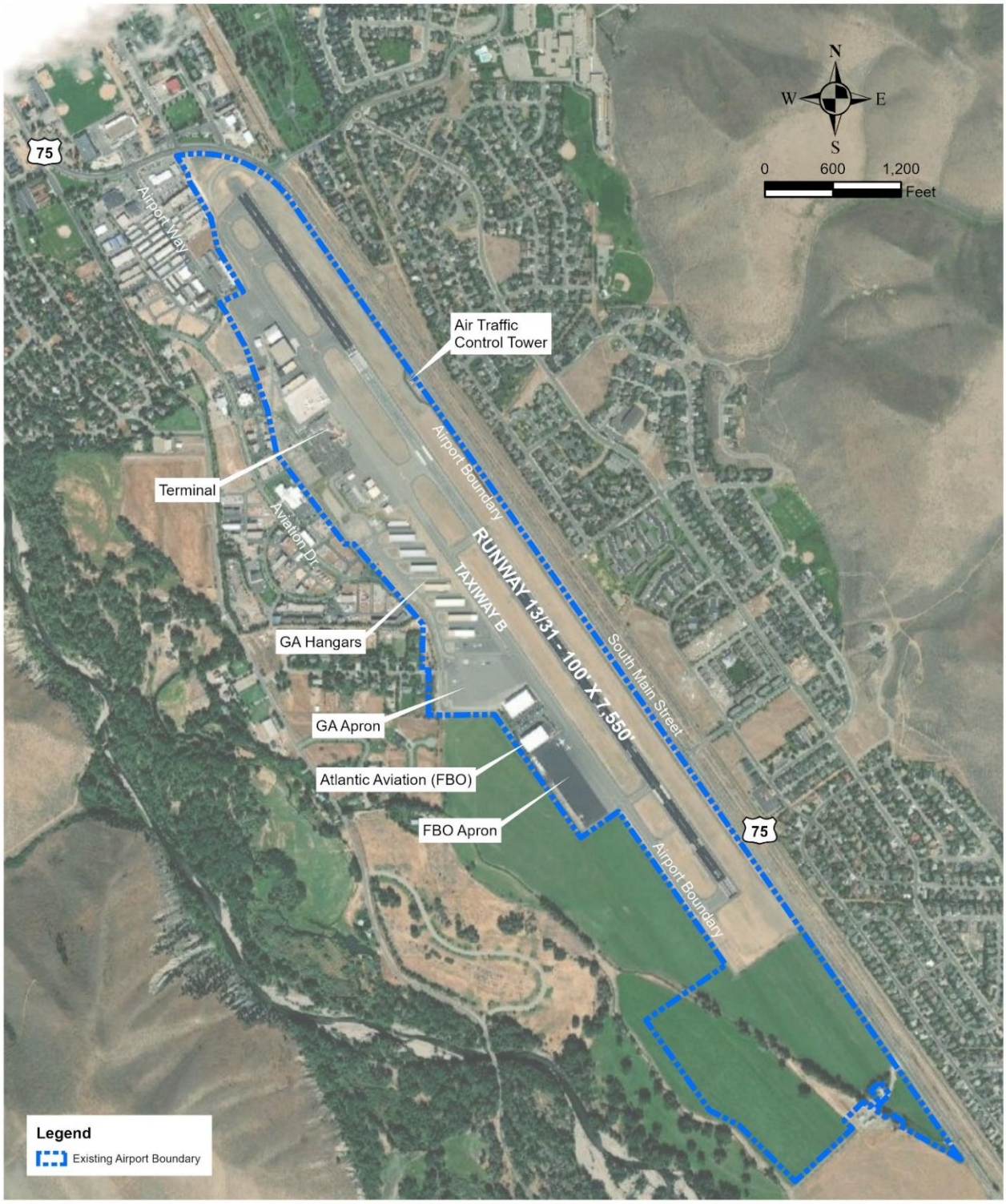

Figure 1.3 Existing Airport Layout

The geography surrounding the Airport presents a unique situation for aircraft utilizing SUN. The runway slopes uphill to the north, favoring landings from and takeoffs to the south. Based on these factors and the physical constraints of the Airport's airspace due to mountainous terrain, departures at the Airport are predominately to the south on Runway 13 and arrivals from the south on Runway 31. This "one-way-in/one-way-out" operation is utilized by commercial airline aircraft and most of the large general aviation aircraft fleet, including corporate jets. As a result, the land on the south end of the Airport is subjected to more airport operations and represents one of the most critical areas to protect from a safety, height restriction, and land use compatibility standpoint.

1.2 Historical and Future Airport Activity

In 2014, the FMAA began updating the Airport's Master Plan, which resulted in the 2018 Master Plan Update (2018 MPU) and associated Airport Layout Plan (ALP), which was conditionally approved by the FAA on August 23, 2018. The ALP is a set of drawings and an associated report that the FAA, State of Idaho, and Sponsor use to plan for future improvements. Together with the 2018 MPU, these documents provide the framework needed to guide future airport development based on forecast aviation demand. A copy of the ALP can be found in **Appendix A**.

Existing and future airport activity levels at SUN were analyzed as part of the 2018 MPU. The forecasts of aviation activity from 2014 were approved by the FAA in May 2015, and a summary is listed in **Table 1.1**. The analysis in this EA document uses an aviation forecast prepared before the COVID-19 public health emergency began. FAA forecast approval was based on the methodology, data, and conclusions at the time the document was prepared.

Table 1.1 Master Plan Update Forecasts Summary

	2014	20-Year Increase	2034	2019 Actual	Primary Facility Considerations
Passenger Enplanements	66,409	98%	131,630	89,317	Terminal Building and Associated Facilities
Based Aircraft	157	37%	213	157	Aircraft Storage and FBO Services
Aircraft Operations					
Air Carrier	2,840	57%	4,453	3,015	Airport and Commercial Apron
Air Taxi and Commuter	5,185	5%	5,450	5,871	GA Aprons and FBO Services
General Aviation	20,310	36%	27,564	14,183	GA Aprons and FBO Services
Military	145	0%	145	106	N/A
Total Aircraft Operations	**28,480**	**32%**	**37,612**	23,175	

Source: 2018 Airport Master Plan Update, FAA Air Carrier Activity Information System (ACAIS), FAA Air Traffic Activity System (ATADS), SUN

Additional information about SUN is available on the ALP and in the facility's 2018 MPU narrative report (available on the Airport's website at https://iflysun.com/master-plan).

1.3 Obstructions, Land Use, and Noise

Title 14 CFR Part 77 (14 CFR Part 77), "Safe, Efficient Use, and Preservation of the Navigable Airspace," establishes criteria for determining obstructions in navigable airspace. It describes imaginary surfaces that surround each airport and are defined relative to the specific airport and each runway to protect the safety of aircraft operating in the airport environment. Any objects (trees, buildings, towers, terrain, etc.) that penetrate these airspace surfaces are known as obstructions.

There are five surfaces associated with 14 CFR Part 77:

1. Primary Surface
2. Approach Surface
3. Horizontal Surface
4. Conical Surface
5. Transitional Surface

In addition to 14 CFR Part 77, the FAA provides additional airport planning guidance in Advisory Circular (AC) 150/5300-13A, *Airport Design*. This design guidance is mandatory for airports that receive federal grants (including SUN). AC 150/5300-13A includes the definition of the Departure Surface (herein referred to as AC 5300-13A Departure Surface), which is designed to allow aircraft to follow standard departure procedures when departing an airport. This surface is much larger than the 14 CFR Part 77 Approach Surface. Obstructions to this surface can affect the safety of departure operations. The map for the 14 CFR Part 77 surfaces and airspace of the Airport is shown in **Figure 1-4**.

The southern end of the Airport is of particular interest to protect, given the constraints of the Airport's location and importance of arrivals to and departures from the south. The 2018 MPU identified numerous penetrations to the 14 CFR Part 77 surfaces at SUN at the southern end of the Airport. Some of these penetrations have been mitigated by removing man-made and natural objects. In 2019, an EA was completed for the acquisition of 64.6 acres of property and for the removal of obstructions at the southern end of Runway 31. However, given constraints surrounding the Airport, removing all obstructions to these surfaces is not realistic, and protecting the southern end of the airport from encroachment of incompatible land uses or additional obstructions is a top priority.

The privately owned properties south of the Airport are zoned for agricultural, residential, and light industrial uses.

The 2018 MPU also discussed land use and noise at SUN and stated:

> Non-airport development has encroached closely upon the Airport boundary in recent years. This increases the potential for noise issues and compromises the Airport's ability to meet future needs. The Airport should work cooperatively with the communities it serves to prevent the creation of new incompatible land uses in the Airport vicinity and avoid increases in average aircraft noise levels. Encroachment of development around the Airport will continue to create tension between the Airport and its neighbors, and it will be much easier to prevent incompatible uses than to address them after they have been built.

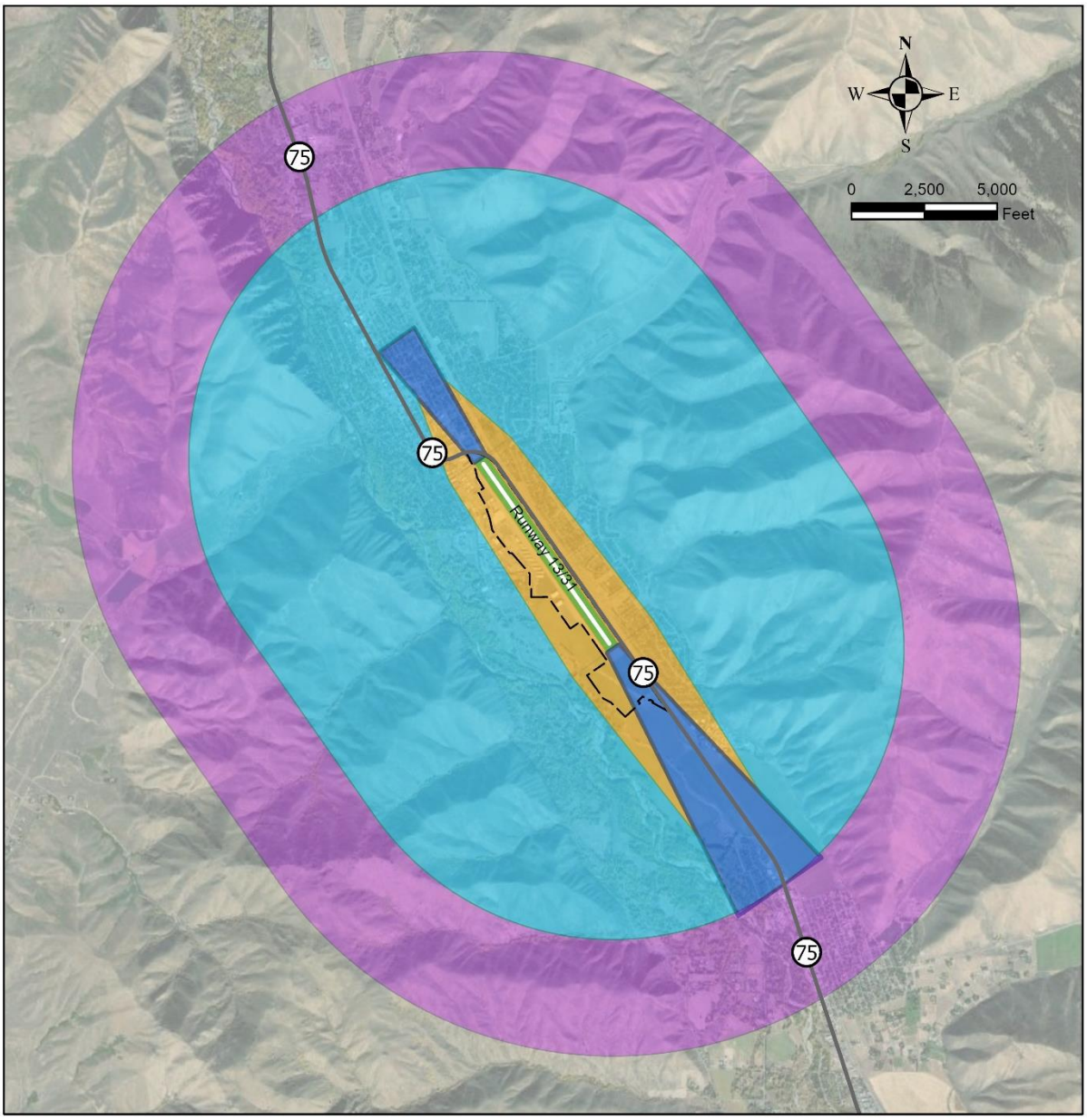

Figure 1.4 14 CFR Part 77 Surfaces

1.4 Proposed Action

The Proposed Action will protect the 14 CFR Part 77 Approach Surface and AC 5300-13A Departure Surface (herein referred to as approach and departure surfaces) to the south of the Airport from incompatible development and land uses and provide for a development area to meet ongoing and future demand for apron and hangar development. The Proposed Action includes the following elements, and is depicted on **Figure 1.5**:

- Acquisition of approximately 386 acres of privately- owned property adjacent and south of the Friedman Memorial Airport.
- 10.4-acre aviation development area: Development of aircraft parking apron, hangars, vehicle access and vehicle parking on 10.4 acres of the property to be acquired, which also includes installation of utilities and relocation of the Airport perimeter fence around the area.

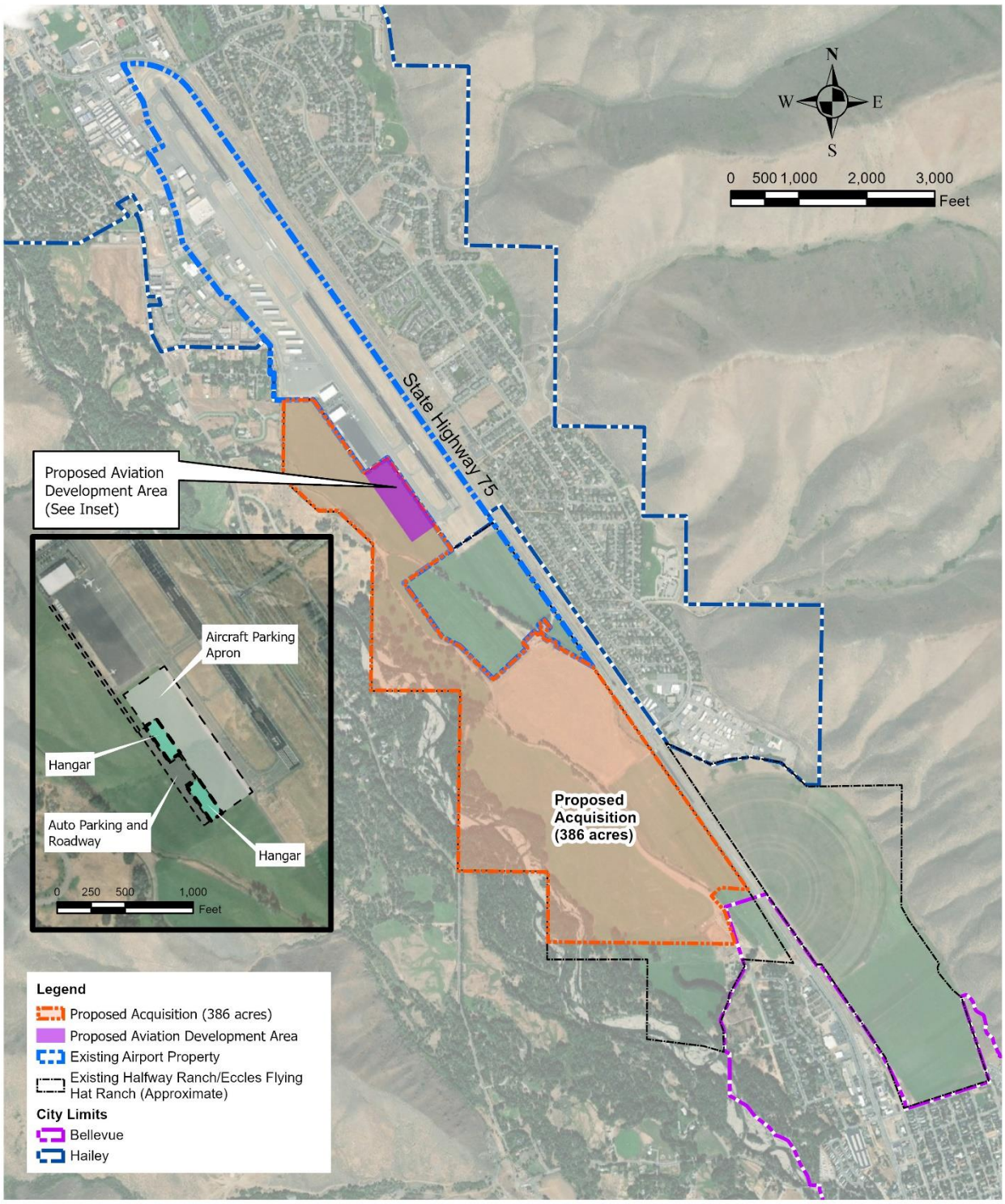

Figure 1.5 Proposed Action

Chapter 2

Purpose and Need

2. Introduction

This chapter details the purpose and need of the Proposed Action at SUN.

2.1 Purpose

The purpose of the Proposed Action is to protect the approach and departure surfaces to the south of SUN from incompatible development and land uses and to meet ongoing and future demand for apron and hangar development by developing a small acreage of the property proposed for acquisition.

2.2 Need

The need for the land acquisition to the south is for the FMAA to have control of the land to prevent land use or activities and purposes that might be incompatible with normal airport operations, including landing and takeoff of aircraft. The need for aviation-related development is to accommodate aircraft parking requirements (both apron parking and indoor hangar parking).

2.2.1 Property Acquisition

The FMAA is proposing to purchase approximately 386 acres of property located adjacent and just south of the Airport and west of State Highway 75 within the City of Hailey and Blaine County. The property proposed for acquisition is a subsection of a larger property known as the Halfway Ranch/Eccles Flying Hat Ranch. Sections of the Big Wood River lie within the western portion of the property proposed for acquisition. FAA Grant Assurance 21, *Compatible Land Use*, states that the Airport should:

> take appropriate action, to the extent reasonable, including the adoption of zoning laws, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft.

The majority of the 386 acres of property lies under the approach and departure surfaces at the south end of the Airport, as discussed in **Section 1.3** of this document. These surfaces extend outward and slope upward from the end of the runway and are intended to provide clear approach and departure paths for aircraft operating at SUN. The FMAA has recently been successful in improving instrument approach capabilities for aircraft arriving from the south and will continually seek improvements to these capabilities as technology and the airport operating environment allow. The protection of approach surfaces allows for the continued use of these improved approach capabilities.

Airport ownership of the property underlying these surfaces would allow the Airport to protect the surfaces from development of incompatible land uses, which may involve structures, towers, or vegetation that would potentially penetrate these surfaces and present as an obstruction to aircraft operations. The majority of the 386 acres of property is also included within either the 60 or 55 day-night average sound level (DNL) noise contours,

meaning land uses on the property also have the potential to be impacted by aircraft noise. Airport ownership of this property would prevent future development of noise sensitive land uses.

The property proposed for acquisition is currently zoned for agricultural, low density residential, and light industrial uses. This zoning is consistent with the zoning of surrounding parcels south of the Airport. The property is currently operated, maintained, and irrigated for agricultural purposes (pastureland) as part of the Halfway Ranch/Eccles Flying Hat Ranch. The FMAA does not have zoning authority zoning authority. Blaine County administers zoning regulations surrounding the Airport and, as a sponsor of the FMAA, maintains its responsibility to protect land uses in the vicinity of the Airport. However, with current zoning regulations, the FMAA and Blaine County have limited ability to further restrict incompatible land uses south of the airport.

The Halfway Ranch/Eccles Flying Hat Ranch features various structures, including a farmhouse, two barns, and several other outbuildings. Except for approximately 10.4 acres, the Airport plans to continue this agricultural use of the property through lease agreements. All structures would remain on the property, with the farmhouse and the barns and outbuildings to either continue their use for agricultural purposes or be used for Airport purposes. Acquisition of the property would protect essential approach and departure surfaces for the Airport from potential development that could include incompatible land uses or development that may be sensitive to airport noise. Acquisition of the property is supported by the FAA for the FMAA's compliance with Grant Assurance 21.

Aside from the development of 10.4 acres for aeronautical use as described in the following section, the Airport has no plans to use the property proposed for acquisition for the development of a runway extension or additional runways. As can be seen on the ALP (conditionally approved by the FAA on August 23, 2018, and provided in **Appendix A**) there is no development shown beyond the southern end of Runway 31.

2.2.2 10.4-Acre Aviation Development Area

Approximately 10.4 acres out of the 386 acres proposed for acquisition have been identified for possible future aeronautical development, including expansion of the aircraft parking apron and construction of aviation hangars, vehicle parking, and roadways. According to the Airport's 2018 MPU, the proposed aeronautical development (development that requires runway and taxiway access) on the 10.4-acre site will consist of aircraft parking apron and general aviation hangars. The development of facilities is included in this EA because it is reasonably foreseeable and contingent on acquiring the property included in the Proposed Action.

A development project in 2015 to address safety area deficiencies and relocate Taxiway B resulted in a net loss of 150,000 square feet of general aviation apron space. The Proposed Action would offset that loss as well as add 160,000 square feet of apron space to accommodate peak summer demand for aircraft parking, as recommended in the 2018 MPU. The additional apron area would alleviate delays in operations resulting from congestion and increased aircraft movements needed for repositioning due to overcrowding on existing aprons. The 2018 MPU identified no additional space available on Airport property to expand general aviation apron or hangars. This 10.4-acre parcel is also the last undeveloped parcel along Taxiway B, the full-length parallel taxiway to Runway 13/31. The location of the parcel immediately adjacent to Taxiway B makes this an appropriate area for aeronautical development.

2.3 Federal Actions by the FAA

The federal actions requested of the FAA are:

- Unconditional approval of the ALP to depict those portions of the Proposed Action subject to FAA review and approval pursuant to 49 United States Code (USC) § 47107(a)(16)(B).
- Determination that Environmental Analysis Prerequisites associated with any future Airport Improvement Program (AIP) funding application have been fulfilled pursuant to 49 USC § 47101.

2.4 Action Funding and Time Frame

The acquisition of property and subsequent change to the ALP and Exhibit A Property Map could take place as soon as late summer 2022. The estimated cost of acquisition of the 386 acres is $7.5 million (based on the 2018 MPU fee estimate for the 65 acres acquired in 2019 for the runway protection zone (RPZ)).

The development of the 10.4-acre aviation development area to include general aviation apron, hangars, and associated vehicle parking and roadways could occur within five years, pending approval by the FMAA. The 2018 MPU estimated this project to cost $2.8 million in 2018 dollars. There is strong demand for hangar and tiedown space, and the FMAA would need to determine when demand has reached the threshold for action on this element.

Chapter 3

Alternatives

3. Introduction

The consideration of alternatives allows for an objective decision-making process and is crucial for the completion of the NEPA process. This chapter describes the alternatives considered and their ability to meet the purpose and need as described in **Chapter 2**.

This chapter also summarizes the process used to identify the alternative(s) analyzed in detail and describes those alternatives. In accordance with FAA Orders 1050.1F and 5050.4B, alternatives can be eliminated from further consideration if the alternatives do not fulfill the purpose and need for the Proposed Action or if they are not feasible and prudent to implement. The term "feasible" refers to sound engineering principals (according to FAA Order 5050.4B page 10-10), while the term "prudent" refers to rational judgement. According to FAA Order 5050.4B, a project may be possible (feasible), but not prudent when one considers safety, policy, environmental, social, or economic consequences.

3.1 Range of Alternatives

The evaluation of alternatives, including the Proposed Action and No Action alternative, is required by the NEPA and by CEQ Regulations (40 CFR §1502.14). The evaluation includes consideration of reasonable alternatives to the Proposed Action, and, for alternatives that were eliminated from detailed study, a brief discussion of the reasons for their elimination.

A range of alternatives have been considered for both land acquisition and aviation development.

3.1.1 Alternatives for Land Acquisition

This section describes the alternatives for land acquisition and the process of evaluating each of them.

Acquire 386 Acres of Ranch Property (Proposed Action)

To meet the purpose of protecting the primary approach and departure corridors from incompatible land use and/or development resulting in structures that could present obstructions to aircraft approaches and departures, this alternative proposes to acquire 386 acres of property south of the Airport and to continue to operate this land for agricultural purposes, except for the 10.4-acre aviation development area. The 386 acres property is available for purchase and is being offered for sale in its entirety. The acquisition of acreage less than 386 acres would leave the possibility open that the remaining acreage would be sold and used for incompatible land uses.

Acquisition of property that is available for purchase would protect the essential approach and departure surfaces closest to the Airport from potential development that could include incompatible land uses or development that may be sensitive to airport noise. Ownership of the property would allow the Airport to protect the approach and departure surfaces from development of incompatible land uses and that might involve structures, towers, or vegetation that would potentially penetrate these surfaces and be an obstruction to aircraft operations. Airport ownership of this property would prevent future development by noise sensitive land uses.

*This alternative meets the purpose and need as described in **Chapter 2** for land acquisition to the south for the FMAA to have control of the land to prevent land use or activities and purposes that might be incompatible with normal airport operations, including landing and takeoff of aircraft. This alternative is carried forward for further analysis in this EA as the Proposed Action (**Figure 3.1**).*

Acquire Entire Ranch Property

This alternative would involve acquiring the entire 732-acre Halfway Ranch/Eccles Flying Hat Ranch property (instead of only the 386 acres south of the airport and west of Highway 75, **Figure 3.2**). The 732 acres are more land than what is necessary to meet the purpose and need of protecting the Airport from incompatible development and safely and efficiently accommodate aircraft operations. Through discussions with the landowner, the FMAA has determined that it is able to acquire portions of property that are west of State Highway 75.

*This alternative meets the purpose and need as described in **Chapter 2** but involves the acquisition of much more property than is necessary; therefore, it is not considered prudent. This alternative is therefore not carried forward for further analysis in this EA.*

Acquire Property Within Entire Approach Surface

This alternative would involve acquiring the approximate 423 acres of property underlying the entire 14 CFR Part 77 Approach Surface (**Figure 3.3**) to Runway 31. Of the 423 acres, approximately 146 acres are property that is not part of the Halfway Ranch/Eccles Flying Hat Ranch and is not currently available for sale. Additionally, this alternative would leave portions of the ranch cut off from the rest of the ranch and result in noncontiguous parcel ownership.

*This alternative does not meet the purpose and need as described in **Chapter 2** as it does not also protect the western portion of the AC 5300-13A Departure Surface nearest the airport because the departure surface is wider. Further, it would result in fracturing the Halfway Ranch/Eccles Flying Hat Ranch and involves property that is not for sale, with presumably non-willing sellers. This alternative is not considered prudent and is not carried forward for further analysis in this EA.*

Acquire Property Within Entire Departure Surface

This alternative would involve acquiring 1,128 acres of land underlying the AC 5300-13A Departure Surface to Runway 13 (**Figure 3.4**). However, of these 1,128 acres, approximately 742 acres is property that is not considered available for sale. Additionally, this alternative would leave portions of the ranch cut off from the rest of the ranch and result in noncontiguous parcel ownership.

*This alternative meets the purpose and need as described in **Chapter 2**, as the approach surface is contained within the departure surface. However, it would result in fracturing the Halfway Ranch/Eccles Flying Hat Ranch and involves property that is not for sale, with presumably non-willing sellers. This alternative is not considered prudent and is not carried forward for further analysis in this EA.*

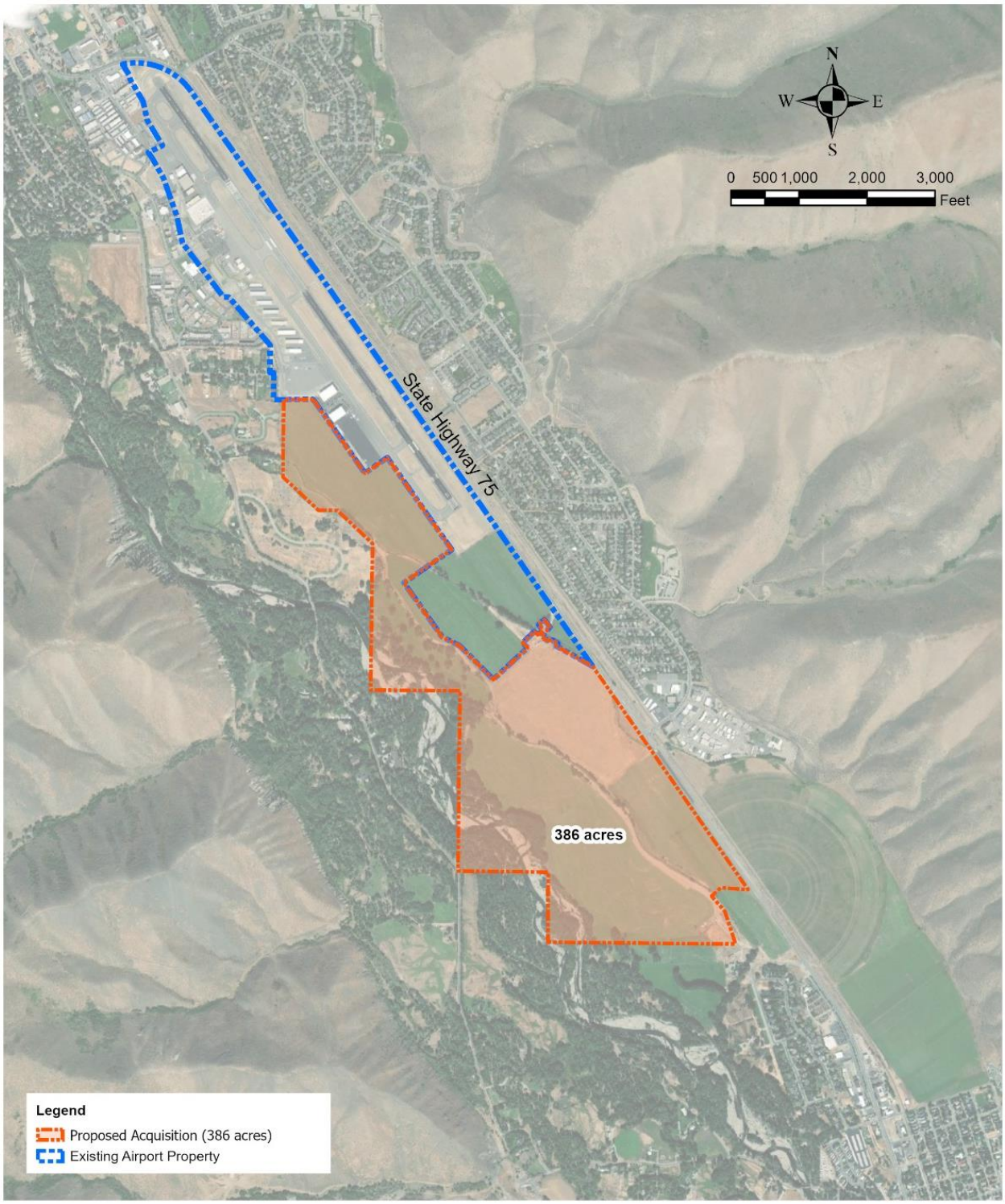

Figure 3.1 Acquire 386 Acres of Ranch Property (Proposed Action)

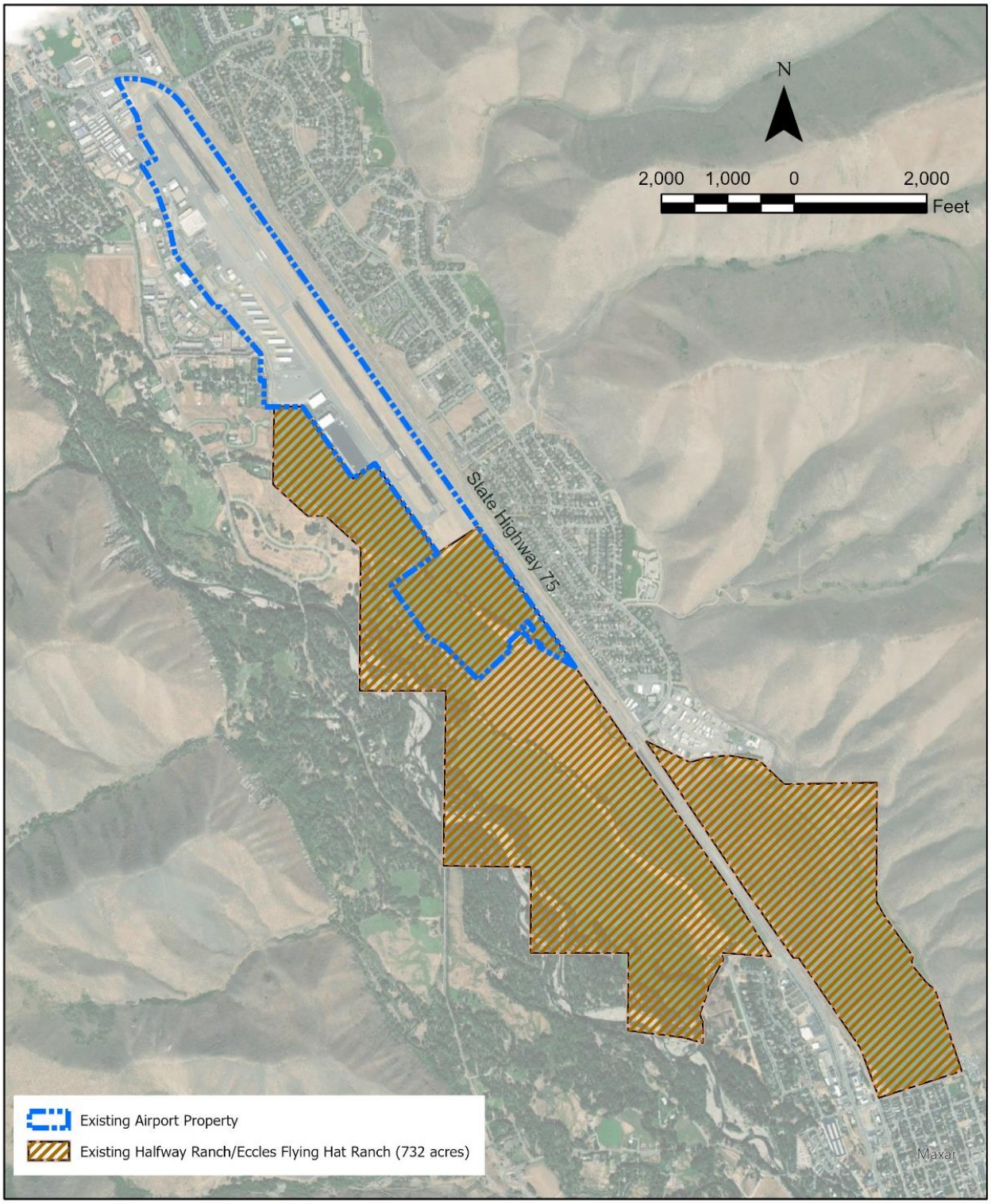

Figure 3.2 Acquire Entire Ranch Property

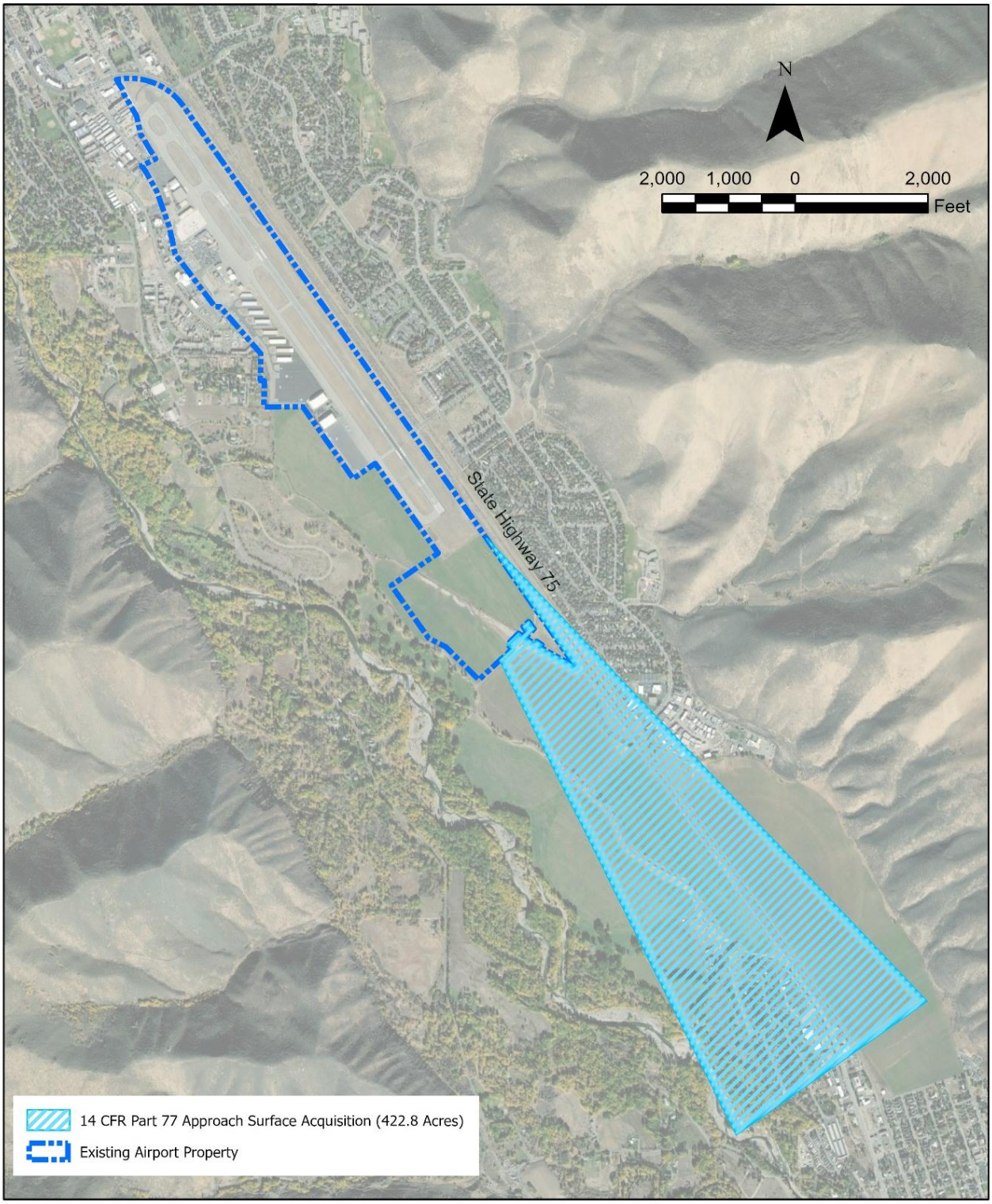

Figure 3.3 Acquire Property Within Entire Approach Surface

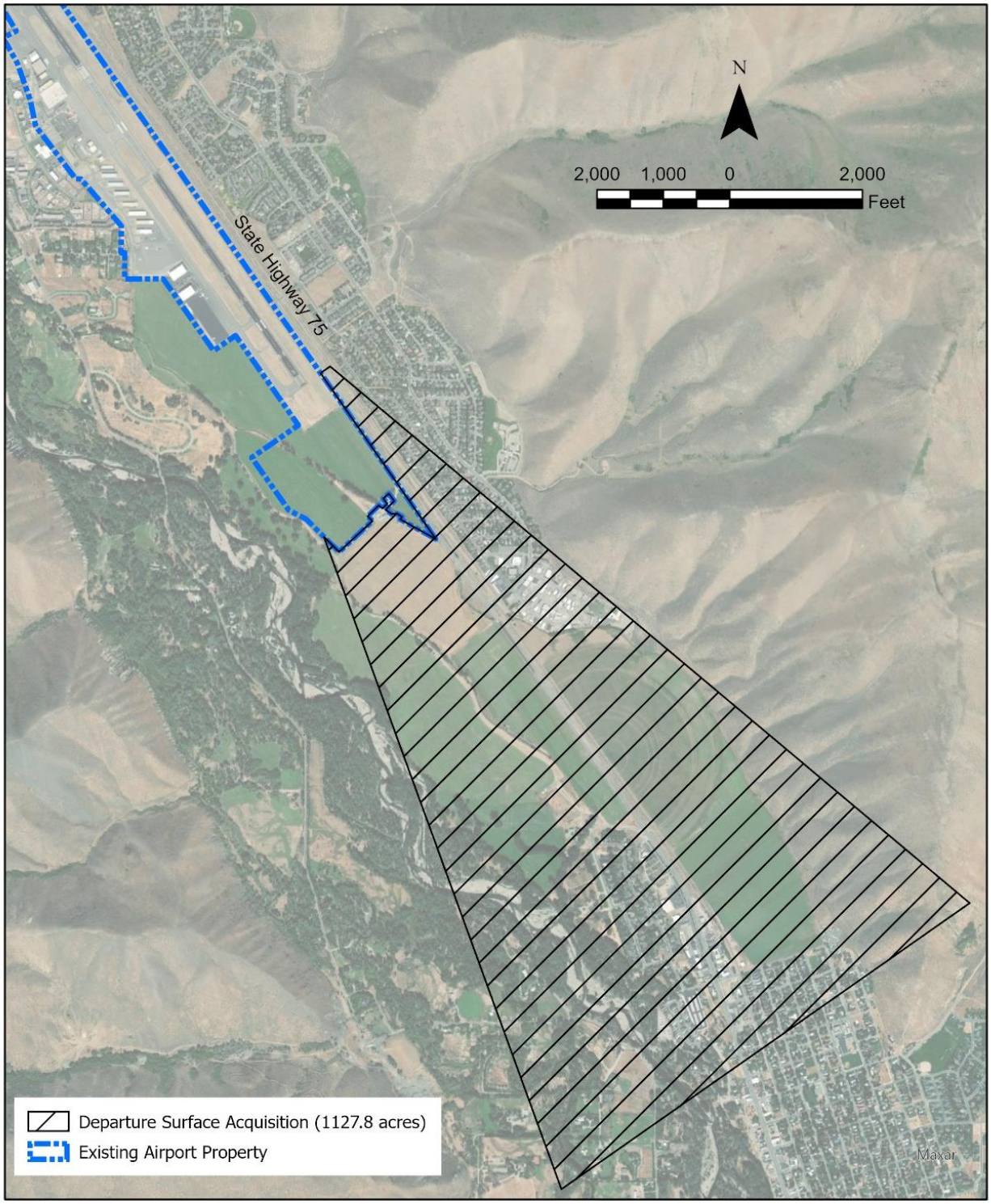

Figure 3.4 Acquire Property Within Entire Depature Surface

Acquire Easements

As an alternative to fee simple acquisition, 386 acres of easements would be acquired with specific height restrictions relative to the approach and departure surface slopes (**Figure 3.5**). This could protect the Airport from the development of land uses that might present as airport obstructions. The easements would grant the Airport control over the height of the land use, but not necessarily the type of land use. As such, it is possible under this alternative that the land could be developed with land uses that are considered incompatible (noise sensitive) with normal airport operations.

*This alternative does not meet the purpose and need as described in **Chapter 2** as it would not adequately protect the Airport from incompatible development and land uses; therefore, this alternative is not carried forward for further analysis in this EA.*

3.1.2 Alternatives for Aviation Development

This section describes the alternatives for the development of aviation facilities and the process of evaluating each of them.

Development of Approximately 10 Acres of Land for Aviation Purposes (Proposed Action)

This alternative involves the development of 10.4 acres of land (as part of the 386-acre ranch parcel) immediately adjacent to Taxiway B at the south end of the Airport. The proposed development consists of construction of aircraft parking apron, aircraft hangars, and associated vehicle parking and roadways. The facility requirements and proposed site for aviation development was identified and evaluated in the 2018 MPU. The proposed size of the aviation development on the 10.4-acre site would be 310,000 square feet of aircraft parking apron and 60,000 square feet of new general aviation hangars.

The aviation development would offset the loss of apron space associated with the past relocation of Taxiway B as well as add 160,000 square feet of apron space to accommodate peak summer demand for aircraft parking, as recommended in the 2018 MPU. The development would occur on the last undeveloped parcel along Taxiway B, the full-length parallel taxiway to Runway 13/31.

*The alternative meets the purpose and need to meet ongoing and future demand for apron and hangar development as described in **Chapter 2**. This is the Proposed Action and is illustrated on **Figure 3.6**.*

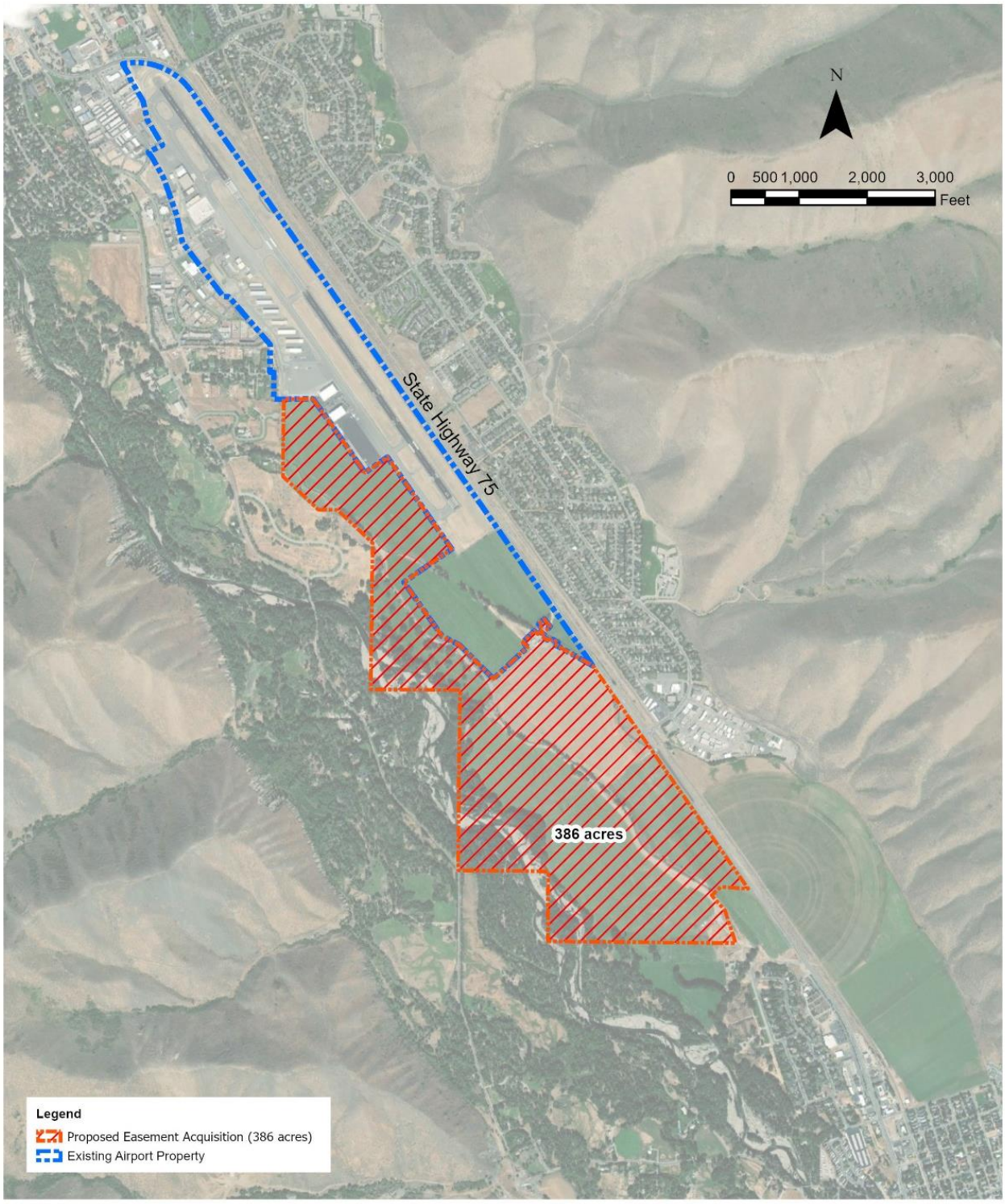

Figure 3.5 Acquire Easements Alternative

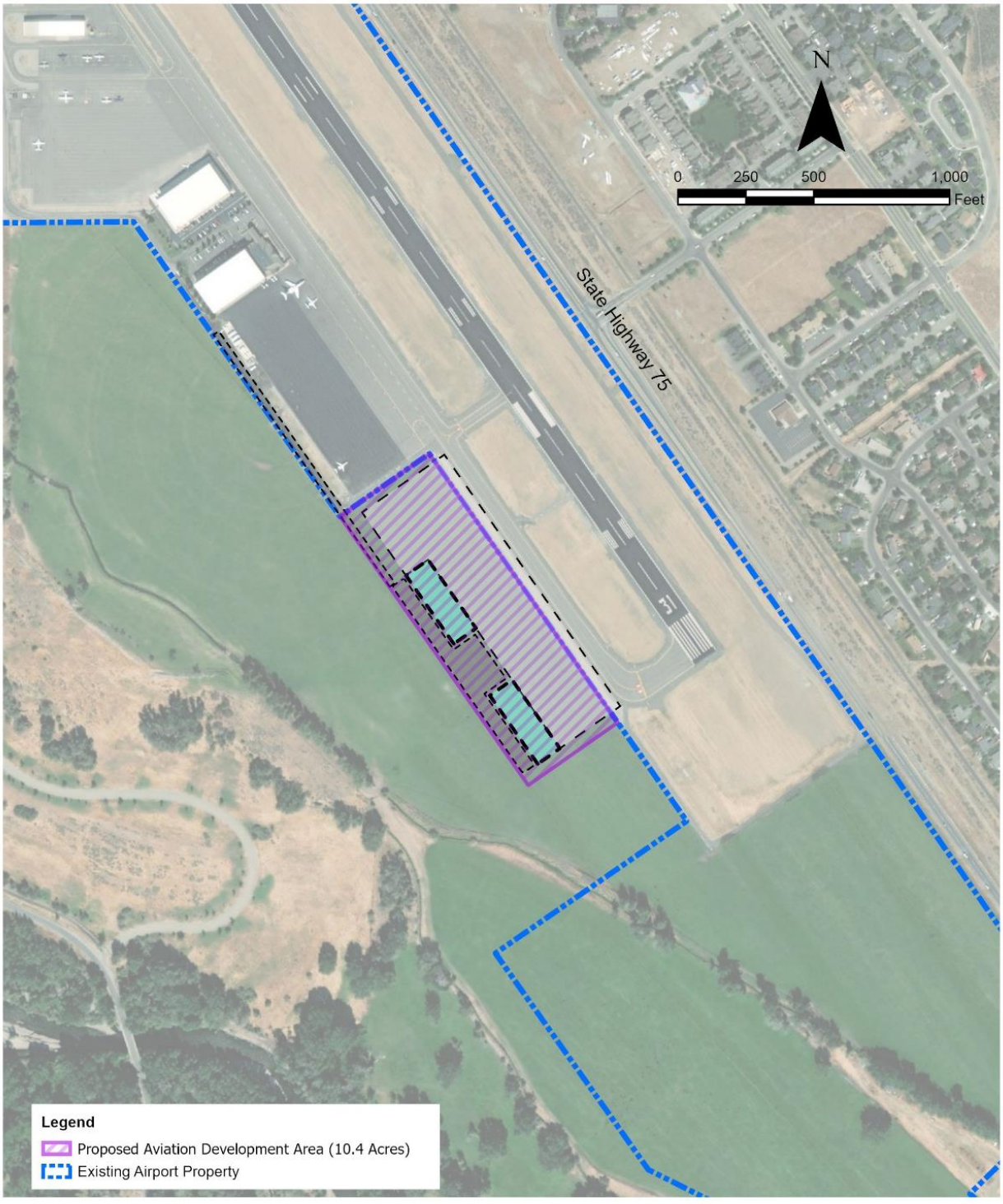

Figure 3.6 Development of Approximately 10 Acres of Land for Aviation Purposes (Proposed Action)

Aviation Development on Existing Airport Property

As described in detail in the 2018 MPU, there is no available airport property for future aviation related development. To construct aviation development on existing airport property, other facilities would have to be razed and relocated, for which there is no corresponding available space. As depicted in **Figure 3.7**, the 2018 MPU identified potential areas where apron areas could be created through the removal of existing buildings; however, no additional locations would be available within existing airport property to replace the removed buildings.

*This alternative does not meet the purpose and need as described in **Chapter 2** as it would not meet ongoing and future demand for apron and hangar development; therefore, this alternative is not carried forward for further analysis in this EA.*

Acquire Property to Construct Aviation Development Elsewhere

The 2018 MPU considered three areas totaling 7.9 acres west of the existing aviation development area for acquisition (**Figure 3.8**). However, the acquisition was considered for future terminal related vehicle parking, not aviation development. Airfield access could not be reasonably provided by these parcels. Further, all three parcels contain existing industrial development that would have to be razed and relocated. For these reasons, acquisition of other property to construct aviation related development is not considered feasible or prudent.

This alternative is not considered feasible or prudent as it does not provide access to landside facilities for aviation development and requires demolition or relocation of existing facilities on the parcels to be acquired; therefore, it is not carried forward for further analysis in this EA.

Figure 3.7 Aviation Development on Existing Airport Property

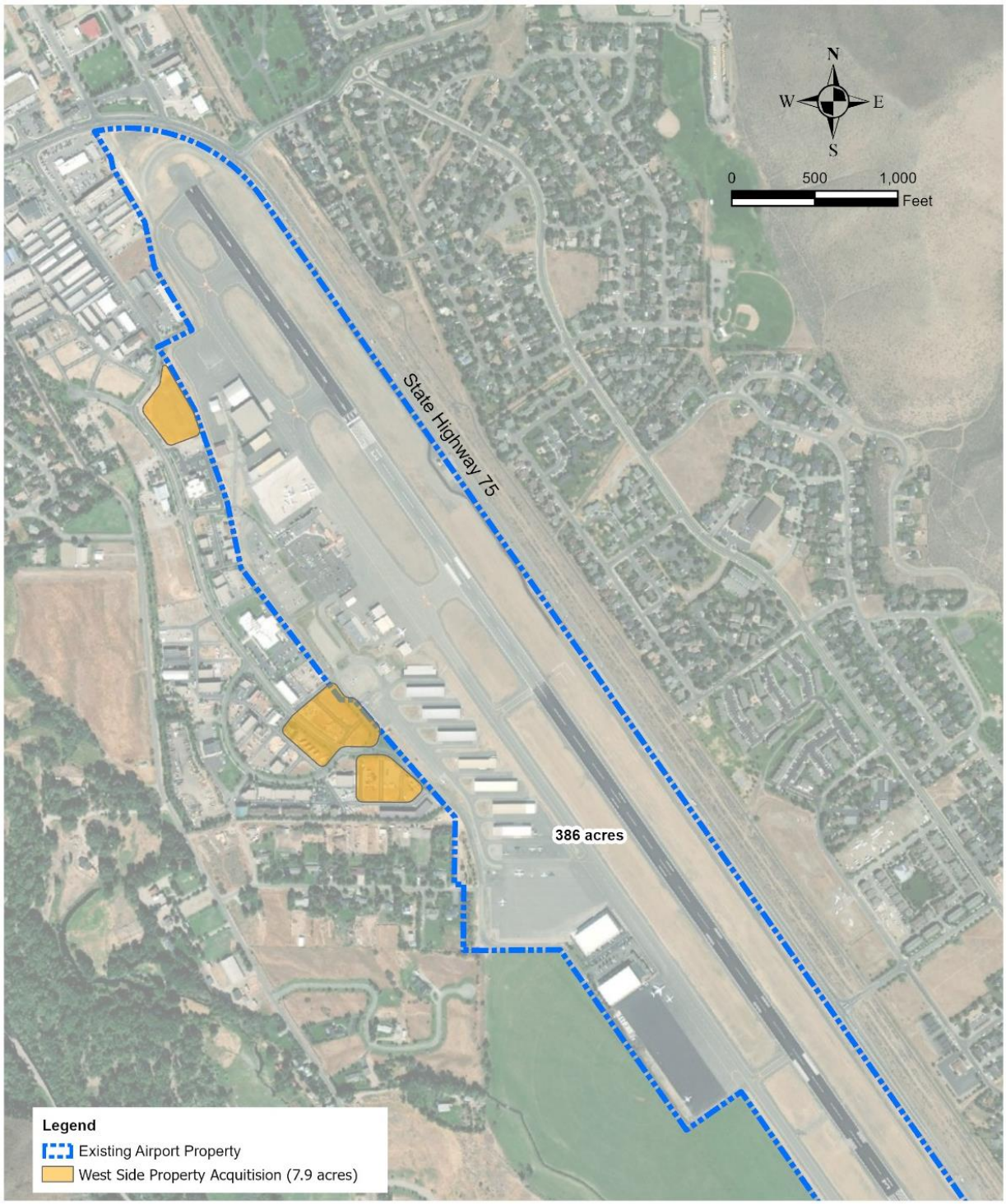

Figure 3.8 Acquire Property to Construct Aviation Development Elsewhere

3.2 Alternatives Carried Forward for Evaluation

This section provides a listing of the alternatives carried forward for detailed evaluation within this EA.

3.2.1 No Action Alternative

NEPA and CEQ regulations require consideration of a No Action Alternative. For this EA, the No Action Alternative is defined as the continued operation of the existing airport facilities. The No Action alternative would leave SUN in its present condition. The No Action here implies that the Airport would not acquire property nor develop additional aviation facilities.

Without acquisition of property to the south of the Airport, the FMAA would be unable to protect essential approach and departure surfaces from development of incompatible land uses that might involve structures, towers, or vegetation that would potentially present as an obstruction to aircraft operations. As the owner of this property is now willing to sell this land, it is important for the Airport to acquire the property to protect against incompatible land uses in the approach and departure surfaces.

Under the No Action alternative, the Airport would not construct additional facilities (aircraft parking apron and/or aircraft storage hangars). As a result, aviation areas and facilities lost because of the past runway safety area (RSA)/taxiway improvements would not be replaced.

Forecast operations are predicted to occur at the Airport regardless of the future development of additional aviation facilities. However, the No Action alternative may prevent the Airport from efficiently meeting both existing and future demand for based aircraft at SUN. Without the 10.4-acres aviation development area, the additional forecast operations would likely still occur; however, under the future conditions, the operations could be limited during peak days and be shifted to non-peak periods. Additional aircraft could be based at SUN without aviation-related development; however, these aircraft would have to occupy apron space as there is no available hangar space for indoor aircraft storage. The consequence of the No Action alternative is that the Airport would continue to operate but would not be able to efficiently accommodate peak demand for aviation facilities and based aircraft.

The No Action Alternative would not address the purpose and need to protect the Airport from incompatible development and land uses and to meet ongoing and future demand for apron and hangar development. While such an alternative does not meet the purpose and need, NEPA requires its consideration; thus, it is carried forward for evaluation.

3.2.2 Proposed Action - Acquire 386 Acres of Ranch Property and Develop 10.4 Acres for Aviation Purposes

To meet the purpose of protecting the approach and departure surfaces from incompatible land use and/or development resulting in structures that could present obstructions to aircraft approaches and departures, this alternative proposes to acquire 386 acres of property south of the Airport and to continue to operate this land for agricultural purposes. The acquisition area is shown with orange shading in **Figure 3.9.**

This alternative also involves the development of 10.4 acres of land immediately adjacent to Taxiway B at the south end of the Airport, construction of aircraft parking apron, and construction of aircraft hangars. The alternative fully meets the purpose and need to meet ongoing and future demand for apron and hangar development. The aviation development is shown with purple shading as well as in the graphic inset in **Figure 3.9**.

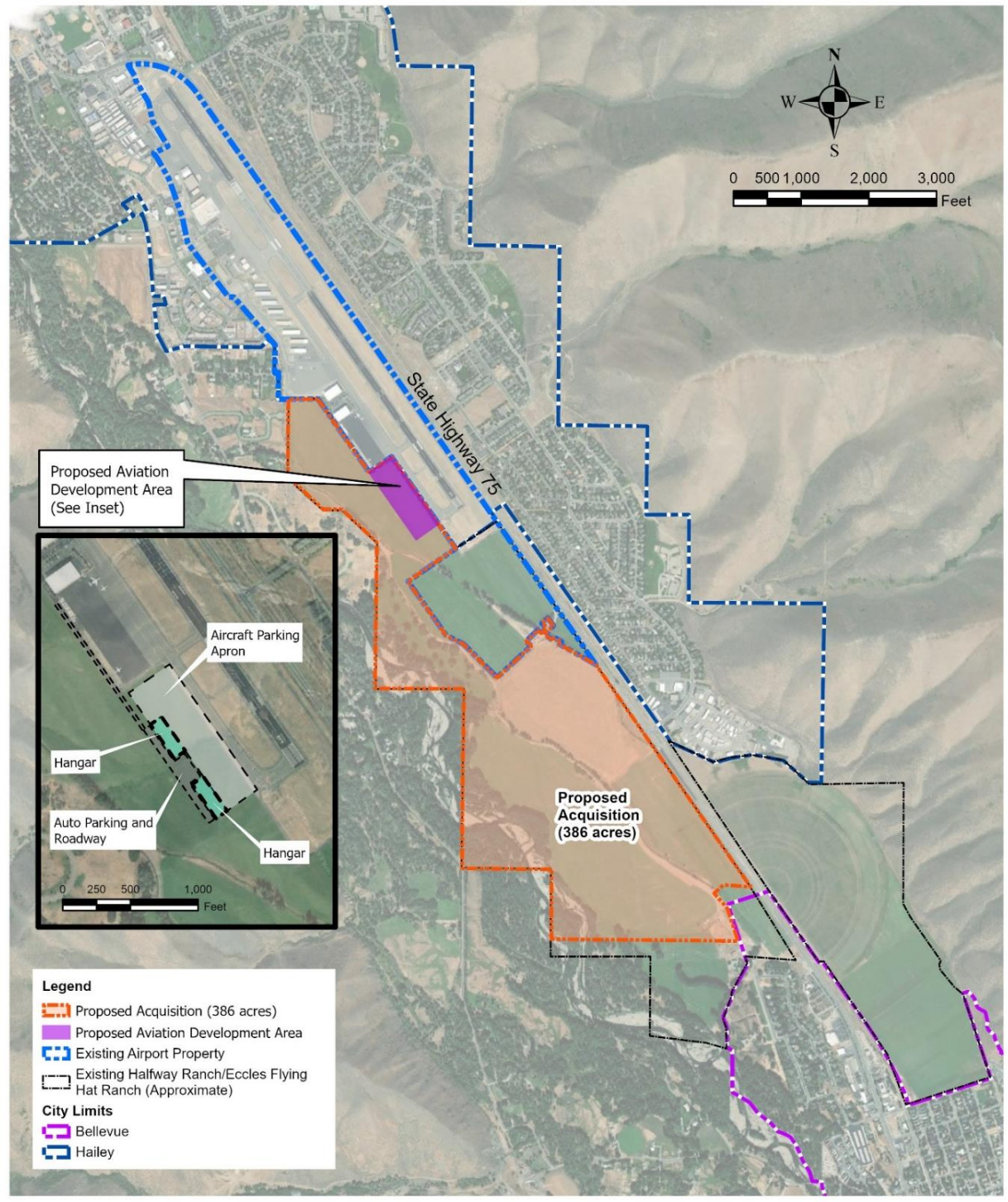

Figure 3.9 Proposed Action

Chapter 4

Affected Environment, Environmental Consequences, and Mitigation

4. Introduction

This chapter evaluates potential impacts related to the Proposed Action on each of the Environmental Impact Categories defined by FAA Order 1050.1F. The evaluation of each Environmental Impact Category includes:

1. Affected Environment, which describes the existing natural, ecological, cultural, social, and economic conditions that could be impacted by the Proposed Action;
2. Environmental Consequences, which evaluates the human and environmental consequences of the Proposed Action for each environmental resource;
3. Mitigation Measures related to anticipated Proposed Action impacts; and,
4. Significance Threshold and Conclusions, which describes the significance threshold for each environmental resource and evaluates the human and environmental consequences of the No Action Alternative and the Proposed Action.

Baseline data used to determine the affected environment (existing conditions) were collected by reviewing existing documentation and databases, consulting with various individuals and agencies, and conducting field investigations.

For comparison, the No Action Alternative is evaluated alongside the Proposed Action. Although the No Action Alternative does not address or meet the Purpose and Need as explained in Chapter 2, NEPA and CEQ regulations require evaluation of a No Action Alternative. When compared with the Proposed Action, the No Action Alternative serves as a reference point.

4.1 Air Quality

Air quality is regulated by the United States Environmental Protection Agency (EPA) under the Clean Air Act (CAA). Idaho has not promulgated state-specific air quality criteria pollutant standards and incorporates the EPA's rules by reference.

The CAA establishes National Ambient Air Quality Standards (NAAQS) for ambient concentrations of criteria pollutants:

- Carbon monoxide (CO)
- Nitrogen dioxide (NO2)
- Ozone (03)
- Sulfur dioxide (SO2)
- Lead (Pb)
- Particulate matter (PM_{10} and $PM_{2.5}$)

Nitrogen oxides (NOx) and volatile organic compound (VOC) emissions are precursors to ozone formation. Idaho incorporates the NAAQS into its air quality rules by reference but has not promulgated state-specific criteria pollutant standards.

The General Conformity Rule of the federal CAA prohibits federal agencies (including the FAA) from permitting or funding projects that do not conform to an applicable State Implementation Plan (SIP). If the emissions exceed the thresholds, a formal Conformity Determination is required to demonstrate that the action conforms to the applicable SIP. Under the General Conformity Rule, project-related emissions of the applicable nonattainment/maintenance pollutants are compared to de minimis level thresholds.

The FAA Environmental Desk Reference, **Chapter 1.3.5** states that the General Conformity Rule is only considered when a federal action is proposed to occur in an EPA-designated nonattainment or maintenance area; thus, in attainment areas that meet air quality standards the General Conformity Rule does not apply.

4.1.1 Affected Environment

According to the US EPA Non-Attainment Areas for Criteria Pollutants (Green Book), Blaine County is in attainment for all the NAAQS criteria pollutants; therefore, the General Conformity Rule does not apply. The closest nonattainment/maintenance areas are the Fort Hall nonattainment area and the Portneuf Valley maintenance area for PM10 near Pocatello, Idaho, approximately 100 miles southeast of the Airport. The Idaho Department of Environmental Quality (IDEQ) monitors PM2.5 at Ketchum, Idaho, which is representative of regional conditions. Recent and historic monitoring over the past year show that Ketchum is well within PM2.5 thresholds, with the latest pollution levels at 5.4 µg/m3 with an index value of 19, rated as "Good." PM2.5 emissions are generally caused by smoke and wood burning in the region.

4.1.2 Environmental Consequences

Neither the No-Action Alternative nor the Proposed Action would result in changes to the number or type of aircraft operating at the Airport; therefore, there would be no increase in aircraft emissions. As discussed in Section 2.2.2, aviation development associated with the Proposed Action is intended to replace general aviation apron space that was lost during the 2015 development project, which addressed safety area deficiencies and relocated Taxiway B. Hangar development would accommodate aircraft that already use the Airport. The aviation development of aircraft apron and hangar space would result in increases in efficiency for aircraft and Airport users by alleviating delays in operations resulting from congestion and increased aircraft movements needed for repositioning due to overcrowding on existing aprons.

There are two categories of construction emissions sources associated with the proposed 10.4-acre aviation development area to construct aircraft parking apron, hangars, vehicle access, and vehicle parking:

1. Exhaust emissions from construction-related vehicle activity on public-use roads (referred to as "on-road" activity) and not on public-use roads (referred to as "non-road" activity); and
2. Construction-related emissions not directly emitted from vehicle exhaust systems (referred to as "non-point source emissions"). Non-point source emissions, which include fugitive dust, can be associated with on-road and non-road vehicle activity (e.g., evaporative emissions from vehicle engines, particulates from tire and brake usage, and ground dust re-entrained into the atmosphere due to vehicle movement) and with non-vehicle, construction-related activity such as the mixing of concrete and the drying of asphalt.

The construction criteria pollutant emission rates (represented by tons per year) are presented in **Table 4.1**. The construction emissions inventory was prepared using emission factors obtained from the EPA Motor Vehicle Emission Simulator (MOVES) model in conjunction with equipment fleet mix and runtime assumptions developed using the Airport Cooperative Research Program Airport Construction Emissions Inventory Tool. Construction emissions were assumed to occur in a single year, although they may be split between years depending on future construction schedules, which would result in lower emissions levels for a given year.

Table 4.1 Construction Emissions Inventory (Tons)

Year	CO	NOx	SO2	PM10	PM2.5	VOC	CO2
2022	1.255	2.484	0.007	0.207	0.201	0.221	2686.122

Source: Mead & Hunt

The total construction emissions for each pollutant are far below the thresholds established for the NAAQS. There is not a national air quality emission standard established for carbon dioxide (CO2), and the emission level is provided for disclosure purposes.

4.1.3 Mitigation

No mitigation is proposed as the Proposed Action would not result in exceedance of the NAAQS. During construction activities, emission reduction will be achieved by implementing best management practices (BMPs). These measures will include, but are not limited to, the following:

- Limiting unnecessary idling times on engines
- Erosion control measures to minimize dust

4.1.4 Significance Threshold and Conclusions

As described in FAA Order 1050.1F, Exhibit 4-1 - Significance Determinations for FAA Actions, a proposed project is considered to have a significant impact upon air quality if, "[t]he action would cause pollutant concentrations to exceed one or more of the NAAQS, as established by the Environmental Protection Agency under the Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations." The No Action Alternative would have no effect on air quality, as no changes would occur in the area proposed for acquisition.

The Proposed Action would not result in changes to aircraft operations at the Airport, and therefore, would have no impact on aircraft emissions. Temporary air quality impacts for the six criteria air pollutants (NAAQS) during construction would not cause pollutant concentrations to exceed one or more of the NAAQS. No significant, adverse, nor long-term impacts to air quality are anticipated that could lead to a violation of the NAAQS, and therefore, the Proposed Action would have **no significant effect** on air quality.

4.2 Biological Resources

Biological resources include vegetation and habitat, fish and wildlife, and special status species along with any designated critical habitat to those species. Designated critical habitat is an area formally designated by the United States Fish and Wildlife Service (USFWS) as having physical and biological features essential to the survival of listed species. Federal and state laws and statutes exist to protect species and habitats of special importance.

Specifically, the Endangered Species Act (ESA) lists species that have been designated as threatened, endangered, or candidate species for listing by the USFWS. The USFWS also designates critical habitats that have physical and biological features essential to listed species. The State of Idaho also lists endangered, threatened, and state sensitive species.

4.2.1 Affected Environment

A biological evaluation titled *Biological Evaluation for Friedman Memorial Airport (SUN) Flying Hat Ranch Land Acquisition and Development of a 10.4-acre Parcel, Blaine County, Idaho* was completed on February 10, 2021, and is included as **Appendix B**. The purpose was to determine if there would be effects to species or habitat protected under Section 7 of the ESA (19 USC §1536 (c)) or species of state and local concern.

The preparation of the biological evaluation included a three-day field evaluation of the 386 acres proposed for acquisition (project area) between October 28 and 30, 2020, to assess biological resources including the presence of suitable habitat for special-status species. The field assessment and surveys included on-site biological pedestrian surveys documenting habitat characteristics and observed species. To assess the potential presence of biological resources onsite, biologists utilized aerial imagery, binoculars, and onsite observations, as well as representative site photographs.

The project area is in the Camas Prairie (Level IV ecoregion 12c) subsection of the Idaho Snake River Plain.[1] The Snake River Plain is characterized by sagebrush steppe with intermittent barren lava fields and saltbush–greasewood. The prairie is strongly influenced by flanking foothills that trap mountain surface water and storm water runoff. Alluvial fans and terraces are covered by grasses and sagebrush. The 386 acres proposed for acquisition includes several pastures, constructed irrigation features, and natural watercourses, including stretches of the Big Wood River. **Figure 4.1** depicts the project area, including predominant stream features and general areas of tree cover. Photos of the habitats in the 10.4-acre aviation development area and representative habitats associated with the 386-acre project area are also shown on Figure 4.1.

General Wildlife and Vegetation

The abundance of rangeland, the Big Wood River and associated wetland/riparian habitat, and open space surrounding Hailey, Idaho, provide ample habitat for waterfowl and other wildlife. As detailed in the biological evaluation, during field evaluations of the project area several red-tailed hawks (Buteo jamaicensis) were observed in flight above cottonwood trees near Big Wood River riparian areas. Tracks and signs of coyote(s) (Canus latrans) were observed at Cove Canal.

[1] U.S. EPA. 2020. Ecoregions of Idaho (poster): U.S. Geological Survey Open-File Report 2016–1021. ftp://newftp.epa.gov/EPADataCommons/ORD/Ecoregions/id/id_front.pdf

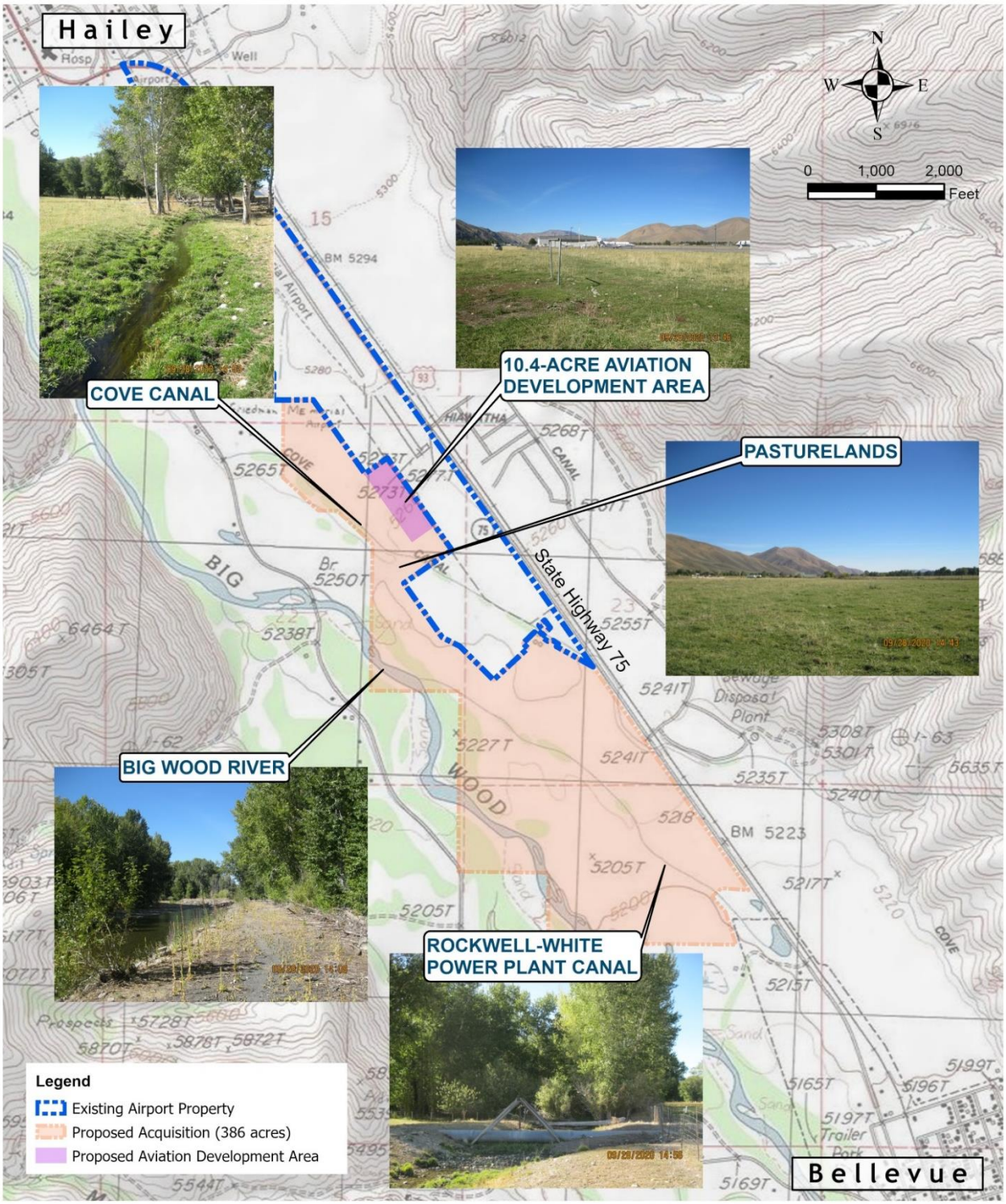

Figure 4.1 Habitat Site Overview

A variety of wildlife exists in Blaine County. Examples of common large mammals in the County include elk (Cervus canadensis), mule deer (Odocileus hemionus), whitetail deer (Odocoileus virginianus), moose (Alces alces), mountain lion (Puma concolor), and black bear (Ursus americanus). Common small mammals include foxes (Vulpes sp.), coyotes (Canis latrans), raccoons (Procyon lotor), porcupines (Erethizon dorsatum), beavers (Castor canadensis), otters (Lontra canadensis), white-tailed jackrabbits (Lepus townsendii), and skunks (Mephitis mephitis). Various songbirds can be found in the County along with larger birds like mallards (Anas platyrhynchos), Canada geese (Branta canadensis), sandhill cranes (Grus canadensis), turkeys (Meleagris sp.), ring-necked pheasants (Phasianus colchicus), and grouse (Tetraoninae spp.).

Vegetative communities across the 386-acre site are predominantly managed areas of irrigated pasture and riparian corridors associated with Cove Canal, Rockwell-White Power Plant Canal, and the Big Wood River. Common vegetation includes barnyard grass (Dactylis glomerata), smooth brome (Bromus inermis), rabbit brush (Chrysothamnus viscidiflorus), tall sagebrush (Artemesia tridentata), bluebunch wheatgrass (Agropyron spicatum), alkali mallow (Malvella leprosa), common canary grass (Phalaris canariensis), bull thistle (Cirsium vulgare), Italian thistle (Caardus pycnocephalus), milk thistle (Silybum marianum), curly dock (Rumex crispus), dogwood (Cornus sericea), Western chokecherry (Prunus virginiana), goldenrod (Solidago spp.), and stinging nettle (Urtica dioica).

The Big Wood River supports a variety of fish species, including bridgelip sucker (Catostomus columbianus), brook trout (Salvelinus fontinalis), brown trout (Salmo trutta), mountain whitefish (Prosopium williamsoni), rainbow trout (Oncorhynchus mykiss), longnose dace (Rhinichthys cataractae), mottled sculpin (Cottus bairdi), redside shiner (Richardsonius balteatus), and speckled dace (Rhinichthys osculus).[2]

Drainage structures and canals within the project area do not support fish species.[3] This is due to multiple diversions and gates for managing irrigation water, as well as the fact that the irrigation canals are seasonally dry outside of irrigation season.

The National Wetlands Inventory (NWI) and National Hydrography Dataset identify three freshwater emergent wetlands, four freshwater forested/shrub wetlands, two freshwater ponds and four riverine wetlands within the proposed acquisition area.[4] Common species within the project area wetlands include black cottonwood, buckthorn (Rhamnus catharica), Russian olive (Elaeagnus angustifolia), cascara buckthorn (Rhamnus purshiana), reed canarygrass (Phalaris arundinacea), yellow sedge (Carex flava), beaked sedge (Carex rostrata), creeping thistle (Cirsium arvense) and stinging nettle (Urtica dioica).

The 10.4-acre aviation development area is comprised of managed pastureland that is planted in grasses, including smooth brome (Bromus inermis), bluebunch wheatgrass (Agropyron spicatum), and common canary grass (Phalaris canariensis).

Federal Threatened and Endangered Species

Endangered species are defined as any native species in danger of extinction throughout all or a significant portion of its range. Threatened species are defined as any native species likely to be classified as endangered within the foreseeable future throughout all or a significant portion of its range. The USFWS Information for Planning and

[2] Idaho Fish and Game, Idaho Fishing Planner Big Wood River. 2022. Species Observed in Surveys. Accessed January 2022. https://idfg.idaho.gov/ifwis/fishingplanner/water/1149052428631
[3] Idaho Fish and Wildlife Conservation Data Center (IDFW-CDC). 2020. Species Occurrence Data for SUN Airport EA. Accessed October 2020.
[4] National Wetlands Inventory Data, October 2020. Accessed October 2020. https://www.fws.gov/wetlands/data/data-download.html

Consultation (IPaC) database for endangered, threatened, proposed, and candidate species with associated proposed and critical habitats was reviewed for potential occurrence in Blaine County.[5]

Three federally endangered, threatened, or candidate species were identified during the review of the USFWS IPaC database: the Canada lynx, North American wolverine, and Yellow-billed cuckoo (**Table 4-2**).[6] No designated or proposed critical habitat was identified within the project area. No federal or state listed species were observed during field visits to the area proposed for acquisition.

Table 4.2 Summary of Endangered, Threatened, and Proposed Species

Species	Status	Habitat Requirements
Canada lynx *(Lynx canadensis)*	Threatened	Boreal forest of typically sub-alpine fir and Engelmann spruce above 4,000 feet in elevation with snowy winters
North American wolverine *(Gulo luscus)*	Proposed Threatened	Alpine/boreal forests of typically whitebark pine, Douglas fir or lodgepole pine, and tundra with heavy snowpack above 7,000 feet in elevation
Yellow-billed cuckoo *(Coccyzus americanus)*	Threatened	Thick, closed canopy riparian forest of mostly cottonwood-willow with dense shrub understory

No occurrence or suitable habitats for federally endangered, threatened, or candidate species were identified in in the project area, including the 10.4-acre aviation development area.

State Sensitive Species and Species of Interest

A review of potential state sensitive species was conducted using the Idaho Fish & Wildlife Information System (IFWIS) to identify species that may occur within a two-mile buffer of the 386-acre property proposed for acquisition. In a February 2022 correspondence with Idaho Fish and Game (IDFG), the agency noted stated that they were not aware of the 10.4-acre aviation development area providing appropriate habitat for Species of Greatest Conservation Need (SGCN) raptors or other sensitive raptors. The IDFG noted that several SGCN Tier 1 species of bumble bee (Morrison's, Western, and Suckley's Cuckoo Bumble Bee) may occur at the 10.4-acre aviation development area if flowering resources are present. The Western and Morrison's bumble bee have been observed within two miles of the project area as recently as 2020 and 2021.

Two state sensitive bird species were identified as having potential for being in the project area: long-billed curlew and olive-sided flycatcher. Red-tailed hawk is a species of interest and was observed during the field visits conducted for the biological evaluation. State occurrence data reported numerous bird species protected under the Migratory Bird Treaty Act (MBTA) within the three-mile radius of the project area;[7] however, no occurrences or presence of long-billed curlews and olive-sided flycatchers have been reported within a 2-mile buffer of the project area.[8]

No occurrence or critical habitats for state listed species were identified within the 10.4-acre aviation development area.

[5] U.S. Fish and Wildlife Service (USFWS). 2020. Information for Planning and Conservation (IPaC). Accessed May 2017. http://ecos.fws.gov/ipac/
[6] U.S. Fish and Wildlife Service (USFWS). 2020. Information for Planning and Conservation (IPaC). Accessed May 2017. http://ecos.fws.gov/ipac/
[7] Idaho Fish and Wildlife Conservation Data Center (IDFW-CDC). 2020. Species Occurrence Data for SUN Airport EA. Accessed October 2020.
[8] Idaho Fish and Wildlife Conservation Data Center (IDFW-CDC). 2020. Species Occurrence Data for SUN Airport EA. Accessed October 2020.

Migratory Birds

Federal agencies must comply with the MBTA of 1918 that prohibits the "take" of any migratory bird, their eggs, or nests without a permit pursuant to 50 CFR 21. "Take" is defined by the MBTA as to "pursue, hunt, shoot, wound, kill, trap, capture, or collect."

Suitable nesting habitat for birds subject to the MBTA is present within portions of and adjacent to the 386 acres proposed for acquisition. The trees and standing snags in the Big Wood River riparian corridor, Cove Canal, and adjacent irrigated swale and pastures are considered suitable for MBTA nesting birds.

Migratory birds that are state protected species and have the potential for being in the project area include the long-billed curlew and olive-sided flycatcher.

Examples of migratory and resident bird species that have been observed within and adjacent to the project area include dark-eyed junco (Junco hyemalis), black-billed magpie (Pica hudsonia), red-winged blackbird (Agelaius phoeniceus), song sparrow (Melospiza melodia), house sparrow (Passer domesticus), Eurasian collared-dove (Streptopelia decaocto), European starling (Sturnus vulgaris), downy woodpecker (Picoides pubescens), mountain chickadee (Poecile gambeli), and red-breasted nuthatch (Sitta canadensis).[9] The following birds were documented during the biological evaluation field survey: red-winged blackbird (Agelaius phoeniceus), red-tailed hawk (Buteo jamaicensis), Steller's jay (Cyanocitta stelleri), northern flicker (Colaptes auratus), American kestrel (Falco sparverius), cliff swallow (Petrochelidon pyrrhonota), and black-billed magpie (Pica hudsonia).

4.2.2 Environmental Consequences

This section addresses the potential impacts of the Proposed Action implementation on fish, wildlife, and plant resources, including federally listed species and Idaho state sensitive species. A biological evaluation was prepared for the project area to satisfy the IDFG and USFWS regulatory requirements and to determine the presence of and potential impacts to fish, wildlife, and plants associated with the Proposed Action (**Appendix B**).

The potential effects on listed and proposed endangered and threatened species were evaluated in relation to the extent of the areas potentially influenced by the Proposed Action, which includes the overall area proposed for acquisition as well as the disturbance associated with the development of aviation facilities on the 10.4-acre aviation development area. The area proposed for acquisition would not be modified and would continue in its current use, except for the 10.4-acre aviation development area.

General Wildlife and Vegetation

The Proposed Action does not include in-water work and would not occur adjacent to waterways. No shrubs or trees would be removed, including in the riparian areas of the Cove Canal, Rockwell-White Power Plant Canal, or Big Wood River.

Vegetative and wildlife communities across the project area would remain unchanged, except for the construction and development associated with the 10.4-acre aviation development area. The aviation development area would be converted from managed irrigated pastureland to pavement and aircraft hangars.

[9] IDFG. 2017. Idaho Fish & Wildlife Information System (IFWIS). Accessed August 2017, https://idfg.idaho.gov/data

The 10.4 acres of habitat conversion represents a very small percentage of total habitats present within the area proposed for acquisition and the vicinity of the Airport. The loss of the managed irrigated pastureland would not represent a meaningful reduction in overall wildlife and vegetation habitat available. Therefore, the Proposed Action may impact but would not likely contribute to a trend towards federal listing or loss of viability for any general wildlife and vegetation species.

Federal Threatened and Endangered Species

Canada Lynx

Lynx habitat can generally be described as boreal forest above 4,000 feet in elevation with cold, snowy winters. The project area is located in a valley of mostly grasses, pasture, and agricultural areas with very little forested habitat and no subalpine fir or Engelmann spruce. Further, current urban development and agricultural use are prevalent in the project area, including proximity to the city of Hailey, Idaho, which is not conducive to Canada lynx habitation. The Proposed Action activities would have no effect on the Canada lynx identified as a federally listed threatened species because neither the species nor its habitat are found in the project area.

North American Wolverine

Wolverines occupy boreal forests and tundra, and their preferred habitat is generally not proximal to areas with human infrastructure or use. Suitable conditions do not exist within or adjacent to the project area, most notably because the project area is well below the general elevation where North American wolverine are known to occur (above 7,000 feet in elevation). No alpine forest or boreal forest habitat is present in the vicinity. Further, current urban development and agricultural use are prevalent in the project area, including close proximity to the city of Hailey, Idaho, which is not conducive to wolverine habitation. Occurrence of North American wolverine is highly unlikely within the project area. The Proposed Action activities would have no effect on the North American wolverine identified as a federally listed proposed threatened species because neither the species nor its habitat are found in the project area.

Yellow-billed Cuckoo

The yellow-billed cuckoo (or YBCC) historically occupied riparian ecosystems across the western United States, including the Wood River Valley. The YBCC requires thick, closed-canopy riparian forest with an understory of dense brush at a minimum of 50 acres in size. Suitable habitat exists along the Big Wood River, including within portions of the project area.[10]

The yellow-billed cuckoo (or YBCC) historically occupied riparian ecosystems across the western United States, including the Wood River Valley. The YBCC requires thick, closed-canopy riparian forest with an understory of dense brush at a minimum of 50 acres in size. Suitable habitat exists along the Big Wood River, including within portions of the project area.

The Proposed Action includes the acquisition of 386 acres, with disturbance limited to the 10.4-acre aviation development area. Suitable YBCC habitat is not present within 1,000 feet of the 10.4-acre aviation development area. YBCC habitat is not present within the area of physical disturbance and is not nearby and subject to indirect impacts. The Proposed Action activities would have no effect on the YBCC because neither the species nor its habitat would be impacted from the continued use of the project area for agricultural uses or the construction and operation of the 10.4-acre aviation development area.

[10] NatureScope. 2017. Biological Resources and Habitat Assessment for SUN Airport Runway Protection Zone Project, Blaine County, Idaho.

State Sensitive Species and Species of Interest

Red-tailed Hawk

Red-tailed hawk is a State Species of Interest and populations are abundant and secure in Idaho. They are widely distributed and can be found wherever there are prey and nesting sites, from forests to deserts to agricultural lands. Some red-tailed hawks are resident birds, but most are partial migrants, migrating south in the winter. Red-tailed hawks nest in March and April near the top of tall trees and are extremely sensitive to disturbance from human interference during nest building and may even abandon the nest.[11]

Red-tailed hawks are sit-and-wait hunters and are often found at a tall perch watching the ground for prey. The project area provides numerous large trees for perching and the adjacent irrigated pasture and riparian areas likely support small mammals, such as voles, mice, rats, gophers, ground squirrels, rabbits, and hares.

There is no proposed removal of trees or reduction of potential nesting and perching habitats suitable for red-tailed hawks. The conversion of the 10.4-acre aviation development site from agricultural land would result in the loss of habitat for small mammals and other red-tailed hawk prey species. However, the loss of habitat is relatively small. In a February 2022 correspondence with IDFG, the agency noted that they are not aware of the 10.4-acre aviation development site providing appropriate habitat for SGCN or other sensitive raptors.

The Proposed Action would have no significant impact on red-tailed hawks as suitable nesting and perching habitats would not be disturbed and abundant feeding areas would remain.

Olive-sided flycatcher

Olive-sided flycatchers migrate to Idaho from April to September for breeding and nesting.[12] Their primary breeding habitat is high elevation mixed conifer that includes whitebark pine (Pinus albicaulis), mountain hemlock (Tsuga mertensiana), grand fir (Abies grandis), subalpine fir (Abies lasiocarpa), and Engelmann spruce (Picea engelmannii); their secondary habitat is low elevation mixed conifer consisting of western larch (Larix occidentalis) and Douglas fir (Pseudotsuga menziesii).[13]

The IFWIS database indicates that no sightings of olive-sided flycatcher have been documented in the vicinity of the project area nor were any identified during field surveys. The project area contains no high elevation mixed conifer habitat nor low elevation mixed conifer habitat associated with the olive-sided flycatcher. As occurrence of the olive-sided flycatcher within the project area is unlikely and discountable, the Proposed Action is expected to have no effect on the olive-sided flycatcher because neither the species nor its habitat is found in the project area.

[11] Idaho Department of Fish and Game. no date. Idaho's Birds of Prey. February 4, 2022, https://idfg.idaho.gov/old-web/docs/wildlife/nongame/leafletBirdsPrey.pdf
[12] Kotliar, N.B. 2007. Olive-sided Flycatcher (Contopus cooperi): a technical conservation assessment. USDA Forest Service, Rocky Mountain Region. Accessed February 4, 2022 at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5182039.pdf
[13] Ritter, S. 2000. Idaho Bird Conservation Plan, Version 1.0. January 2000. Idaho Partners in Flight.

Long-billed curlew

In Idaho, long-billed curlews use grassland, wet meadow, and shrub steppe habitats during breeding, nesting, and migrating periods from March through November. Breeding occurs in early April and nests are built in mostly open habitats void of large trees and shrubs, while brood rearing occurs in denser cover in proximity to water.[14] The breeding of long-billed curlews has not been confirmed in the regions surrounding the project area, although the project area is located in a suspected breeding region.[15]

No long-billed curlews were observed during field surveys, and there are no recorded observations of the species within the project area. While 10.4 acres of pastureland would be converted to development by this project, the agricultural land has no known past use by long-billed curlews. The loss of 10.4-acreas of managed irrigated pastureland would not represent a significant reduction in overall habitat available.

Morrison's, Western, and Suckley's Cuckoo Bumble Bee

Several SGCN Tier 1 bumble bee species (Morrison's, Western, and Suckley's Cuckoo Bumble Bee) may occur in the project area if flowering resources are available nearby, particularly near riparian areas. The Western and Morrison's bumble bee have been observed within two miles of the project area as recently as 2020 and 2021.

The field surveys of the 10.4-acre aviation development area did not identify flowering resources within the area. The nearest riparian area is the Cove Canal, which is approximately 300 feet from the 10.4-acre aviation development area. The Proposed Action would not impact bumble bee habitats. Following development of the 10.4-acre aviation development area, stabilization and restoration of areas will incorporate native flowering plants that are beneficial for pollinators (e.g., bumble bees and butterflies) where able.

Migratory Birds

Suitable nesting habitat for birds subject to the MBTA is present within the project area that includes irrigated pasture, trees near the ranch outbuildings, the riparian corridors, and cavity nests in trees. Aside from the 10.4-acre aviation development area, the proposed acquisition of 386 acres would have no effect on migratory birds and their habitat because the property would be leased for continued agricultural use and would continue to provide habitat for many species. The construction and operation of the 10.4-acre aviation development area would convert managed irrigated pastureland to pavements and hangars; however, the removal of pastureland is not significant when comparted to pasturelands that are present within the project area and adjacent properties. Therefore, the Proposed Action may impact but would not likely contribute to a trend towards federal listing or loss of viability for any migratory bird species.

Correspondence with the IDFG in February 2022 presented no opposition to the Proposed Action, and the agency concurred with the biological evaluation that the Proposed Action will not have an effect on federally listed species, and relayed the information that they were not aware of the project area providing appropriate habitat for SGCN or other sensitive raptors.

[14] Cavallaro, R. 2006. Conservation and management of Long-billed Curlews and waterbirds in the Foster's Slough wetland complex, Teton Valley, Idaho. Wader Study Group Bulletin 109:32.
[15] USFWS. 2009. Status Assessment and Conservation Action Plan for the Long-billed Curlew (Numenius americanus), Biological technical publication BTP-R6012-2009. USFWS Nongame Migratory Bird Coordinator's office, Denver, Colorado. Accessed April 17, 2018 at https://www.fws.gov/migratorybirds/pdf/management/focal-species/Long-billedCurlew.pdf

4.2.3 Mitigation

Because impacts would be limited to development of pasturelands within the 10.4-acre area, impacts will be limited and not result in adverse impacts to federally protected species. Impacts to state sensitive species and migratory birds would be limited to the 10.4-acre aviation development area and would not be significant.

No mitigation is required. Following development of the 10.4-acre aviation development area, stabilization and restoration of areas will incorporate native flowering plants that are beneficial for pollinators (e.g., bumble bees and butterflies) where able. Reevaluation will occur should any sensitive species be found within the 10.4-acre aviation development area prior to or during development for the Proposed Action.

4.2.4 Significance Threshold and Conclusions

According to FAA Order 1050.1F, a proposed action would have significant impacts on fish, wildlife, or plant resources when the USFWS or National Marine Fisheries Service determines that the action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat. Adverse effects may include long-term or permanent loss of unlisted plant and wildlife species; impacts to special status species or their habitats; a substantial loss, reduction degradation, disturbance, or fragmentation of native species' habitats or populations; or adverse impacts on species' reproductive success rates, natural mortality rates, non-natural mortality, or ability to sustain the minimum population levels required for maintenance.

No significance threshold has been developed for non-listed species; however, the additional factors to consider include the long-term or permanent loss of unlisted plants or wildlife species; adverse impacts to special status species or their habitats; a substantial loss, reduction, degradation, disturbance, or fragmentation of the population of a native species or its habitat; adverse impacts on the reproductive success rate, natural or non-natural mortality rates (e.g., road kills) of a species, or their ability to sustain the minimum population levels required for population maintenance.

The No Action Alternative would have **no effect** on biological resources, as no changes would occur in the area proposed for acquisition.

General Wildlife and Vegetation

The Proposed Action **may impact but would not likely contribute to a trend towards federal listing or loss of viability** for general wildlife and vegetation species, as the conversion of pastureland for aviation development would reduce non-paved grass areas. However, the amount of pastureland is insignificant when compared to available habitat along the Big Wood River. Except for the 10.4-acre aviation development area, pasture, grassland, and emergent wetland habitat within the acquired area would remain intact.

Federal Threatened and Endangered Species

The Proposed Action would have **no effect** on federally listed Canada lynx and North American wolverine, as neither the species nor their habitats are found in the project area. The Proposed Action would also have **no effect** on the YBCC, as the 10.4-acre aviation development area does not contain suitable YBCC habitat.

State Sensitive Species

The **Proposed Action may impact but would not likely contribute to a trend towards federal listing or loss of viability** to long-billed curlews and red-tailed hawks. The reduction in irrigated pastureland would reduce potential nesting for the long-billed curlew; however, the amount of irrigated pastureland is insignificant when compared to available habitat within the project area and adequate replacement habitat is readily available. There is no proposed removal of trees or reduction of potential nesting and perching habitats suitable for red-tailed hawks. The conversion of the 10.4-acre aviation development site from agricultural land would result in the loss of habitat for small mammals and other red-tailed hawk prey species; however, the loss of habitat is relatively small. The Proposed Action would have no effect on state sensitive olive-sided flycatcher as neither the species nor its habitat is found in the project area.

The **Proposed Action may impact but would not likely contribute to a trend towards federal listing or loss of viability** of several SGCN Tier 1 bumble bee species (Morrison's, Western, and Suckley's Cuckoo Bumble Bee). The Proposed Action would not impact bumble bee habitats, as field surveys of the 10.4-acre aviation development area did not identify flowering resources within the area. Following development of the 10.4-acre aviation development area, stabilization and restoration of areas will incorporate native flowering plants that are beneficial for pollinators (e.g., bumble bees and butterflies) where able.

Migratory Birds

The Proposed Action **may impact but would not likely contribute to a trend towards federal listing or loss of viability** to some migratory birds. Aside from the 10.4-acre aviation development area, the proposed acquisition of 386 acres would have no effect on migratory birds and their habitat because the property would be leased for continued agricultural use and would continue to provide habitat for many species. The construction and operation of the 10.4-acre aviation development area would convert managed irrigated pastureland to pavements and hangars; however, the removal of pastureland is not significant when comparted to pasturelands that are present within the project area and adjacent properties.

4.3 Climate

Research has shown that an increase in atmospheric greenhouse gas (GHG) emissions is significantly affecting the Earth's climate. These conclusions are based upon a scientific record that includes substantial contributions from the United States Global Change Research Program (USGCRP)—a program mandated by Congress in the Global Change Research Act to "assist the Nation and the world to understand, assess, predict, and respond to human-induced and natural processes of global change."[16] In 2009, based primarily on the scientific assessments of the USGCRP, as well as the National Research Council and the Intergovernmental Panel on Climate Change , the EPA issued a finding that it was reasonable to assume that changes in our climate caused by elevated concentrations of GHG in the atmosphere endanger the public health and public welfare of current and future generations.[17] In 2015, the EPA acknowledged more recent scientific assessments that "highlight the urgency of addressing the rising concentration of carbon dioxide (CO2) in the atmosphere."[18]

[16]U.S. Global Change Research Program (USGCRP) About USGCRP | GlobalChange.gov, https://www.globalchange.gov/about
[17] Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act, 74 Fed. Reg. 66496 (December 15, 2009).
[18] EPA, Final Rule for Carbon Pollution Emission Guidelines for Existing Stationary Sources Electric Utility Generating Units, 80 Fed. Reg. 64661, 64677 (October 23, 2015).

4.3.1 Affected Environment

Research has shown there is a direct correlation between fuel combustion and GHG emissions. GHGs are gases that trap heat in the atmosphere and are primarily a result of burning fossil fuels, such as CO2, methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). Climate change due to GHG emissions is a global phenomenon, so the affected environment is the global climate.

FAA Order 1050.1F states that GHGs and climate change should be considered and evaluated as an impact category in FAA environmental documents, including both EAs and Environmental Impact Statements. However, there are currently no federal standards for aviation-related GHG emissions and, as noted by the CEQ, "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."

4.3.2 Environmental Consequences

Under the No Action Alternative, there would be no change to the impacts associated with GHG emissions or climate.

The main source of emissions related to the Proposed Action would be combustion connected with construction equipment and vehicles associated with the 10.4-acre aviation development area. No significant or sustained increase in construction, vehicular, or aircraft traffic is anticipated as a result of the Proposed Action, and therefore, the increase in emissions during construction is expected to be negligible. Emissions resulting from the construction of the Proposed Action would be temporary and not result in the significant or sustained increase of emissions of CO2. The Proposed Action would not include actions that would likely cause or create a reasonably foreseeable increase in CO2 emissions or have a reasonably foreseeable impact on the local, regional, or global climate. The Proposed Action would not cause or create an increase in aircraft operations at the Airport. Therefore, the Proposed Action would not lead to an increase in operational GHG emissions beyond current projected growth.

4.3.3 Mitigation

No mitigation is required or proposed because the project-related increase in GHG emissions is negligible when compared to the amount of global GHG emissions.

4.3.4 Significance Threshold and Conclusions

While FAA 1050.1F does not provide a significance threshold for aviation-related GHG emissions, the CEQ specifically asks agencies to consider the potential effects an action would have on climate change as indicated by its GHG emissions and the implications of climate change for the environmental effects of an action.

The No Action Alternative would have **no effect** on climate, as no changes would occur from either development or operations.

The Proposed Action would not cause or create an increase in aircraft operations at the Airport; however, due to construction operations, it would result in a temporary increase in GHG emissions during construction activity. The Proposed Action would have **no significant effect** on climate.

4.4 Coastal Resources

The Airport is not located within the Coastal Barrier Resources System, as defined by the USFWS and/or Federal Emergency Management Agency (FEMA). Neither the Proposed Action nor the No Action Alternative would affect a coastal zone as the state of Idaho is located entirely inland and does not contain any marine coastal barriers or coral reefs.

4.5 Department of Transportation, Section 4(f)

Department of Transportation, Section 4(f) was initially codified in Title 49 of the USC § 1653(f) (Section 4(f) of the USDOT Act of 1966). In 1983, § 1653(f) was reworded and recodified as Title 49 USC § 303 but is still commonly referred to as Section 4(f). Congress amended Section 4(f) in 2005 when it enacted the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU).

Section 4(f) provides that the Secretary of Transportation shall not approve any program or project that requires the use of any publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance, as determined by the federal, state, or local officials having jurisdiction if there is no feasible and prudent alternative for the use of such land.

4.5.1 Affected Environment

The Study Area under Section 4(f) corresponds to the project area for the Proposed Action: 386 acres of property proposed for acquisition.

Review of national, regional, county, and city recreation facilities and parks was conducted using ESRI databases as well as research using published national, state, and local recreation resource descriptions to identify potential Section 4(f) resources within and near the project area. Five public parks (Roberta McKercher Park, Foxmoor Park, Keefer Park, Lawrence Heagle Park, and Founders Field), four public trails (Broadford/River Street Loop, Colorado Gulch Road, Toe of the Hill Trail, and Wood River Trail, two public trailheads (Toe of the Hill Trailhead and Broadford Road Trailhead), and the Hailey Rodeo Grounds are located within the vicinity of the Airport. With exception of the Broadford/River Street Loop, all of these resources are outside, and not adjacent, to the project area. **Figure 4.2** depicts the location of nearby public parks and trail resources.

The Broadford/River Street Loop is a recreational trail that incorporates portions of the Broadford Road right-of-way west of the Airport and loops back east of the Airport along the Wood River Trail. The loop is generally between the City of Hailey and City of Bellevue. The trail is relatively flat, and it takes in both open and wooded terrain as it meanders near the Big Wood River. The western portion of the Broadford/River Street Loop is adjacent to the project area; however, it is outside the property boundaries of the proposed acquisition area.

No wildlife or waterfowl refuges of national, state, or local significance were found near the project area.

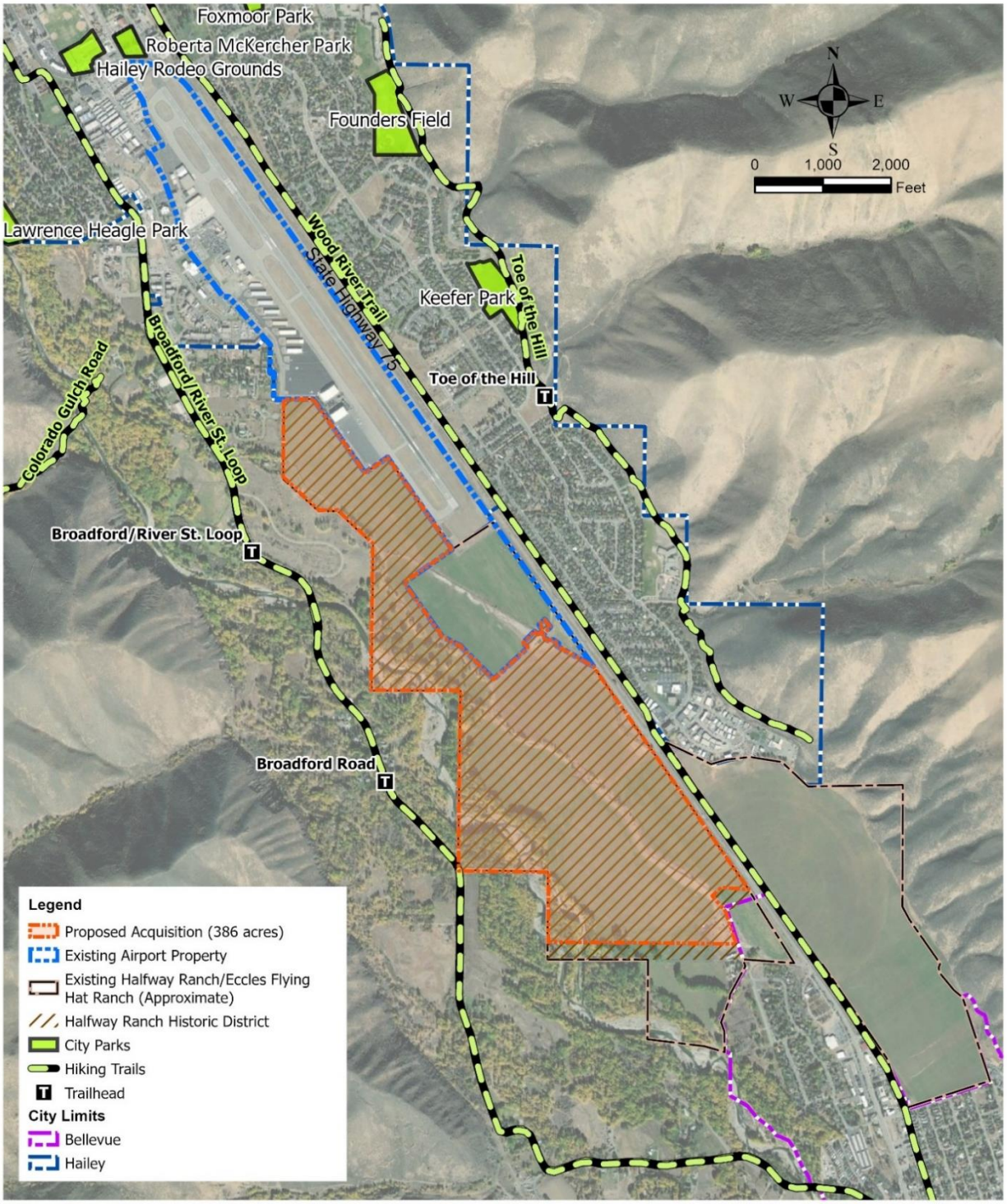

Figure 4.2 Parks and Recreation Resources

Survey, documentation, and evaluation of historic properties within the project area was completed per Section 106 of the National Historic Preservation Act (Section 106) in 2018 in the cultural resources survey report titled *Friedman Memorial Airport Land Acquisition and Obstruction Removal* (2018 intensive survey). The acreage proposed for acquisition is located within the historic boundary of the Halfway Ranch/Eccles Flying Hat Ranch Historic District (District), which had been previously determined eligible for listing in the National Register of Historic Places (NRHP). Built environment resources within the project area relate to agriculture and are limited to the contributing resources and individual properties eligible for listing on the NRHP within the District, which include a farmhouse, barn, equipment shed, grain bin, utility building, well, and Cove Canal. The barn, Cove Canal, and Rockwell-White Power Plant Canal are individually eligible for listing in the NRHP. The 2018 intensive survey can be found in **Appendix C**.

State Highway 75, which is adjacent to, but outside the project area, was also identified in the 2018 intensive survey and determined to be an NRHP-eligible Section 4(f) resource. State Highway 75 is a two-lane historic highway that travels north-south along the eastern side of the Airport.

Within the 386-acre area proposed for acquisition, the following historic resources were determined to be NRHP-eligible Section 4(f) resources:

- Halfway Ranch/Eccles Flying Hat Ranch Historic District (13-16207) (west of Highway 75)
- Cove Canal (10BN1126)
- Rockwell-White Power Plant Canal (10BN1191)
- Barn (previously recorded as a part of the SH-75 EIS)

Halfway Ranch/Eccles Flying Hat Ranch Historic District (13-16207) is eligible for listing in the NRHP as it retains sufficient integrity to communicate its historic associations with the agricultural development of the Wood River Valley and because it embodies distinctive characteristics of the settlement period methods of construction during the early twentieth century. The ranch is a relatively rare surviving example in the Wood River Valley of an early twentieth century large-acreage ranch district, complete with the key, character-defining historic elements of open pastureland, tree lines, and a nucleus of farmstead buildings that clearly convey a sense of past time and place. Though few resources on the ranch appear to be individually eligible, the ranch as a whole appears to be eligible for listing in the NRHP as a Historic District made up of its contributing resources and landscape elements.

The Cove Canal (10BN1126) is an historic irrigation feature established in 1882. It originates from the Big Wood River and traverses the project area. The Canal generally flows southeasterly, diagonally across the project area. After flowing for a total of approximately 7.65 miles, the Canal terminates southeast of the Town of Bellevue. The Cove Canal is associated with significant trends in local history and retains sufficient integrity to communicate its historic associations with the agricultural development of the Wood River Valley.

The Rockwell-White Power Plant Canal (10BN1191) carries water from the Big Wood River to the site of the former Rockwell-White Power Plant. Its point of diversion is NE¼ SE¼ Section 22, T2N R18E from the left bank of the Big Wood River. It travels a path to the southeast across the ranch and ends near State Highway 75, where it leads into the former power plant tail race structure and is then diverted into the Kohler Ditch and Arkoosh Canal. The Canal supplied water for electricity for mining and the community of Bellevue until it was decommissioned for industry in 1945.

The barn located within the District (NRHP Individually Eligible) is an excellent example of an early twentieth century ground-level stable barn. It has a large wood frame and a steeply pitched gambrel roof with the following

features: open eaves with exposed rafter tails; corner boards; large, hinged door/ramp centered in the top of the east gable; and a row of square, four-light wood windows illuminating stalls. The barn communicates strong associations with development of the ranch and agriculture in the Wood River Valley, as a whole.

An archaeological survey was conducted for the 10.4-acre aviation development area in 2020. No prehistoric or Native American resources were documented as part of the archaeological survey. The archaeological survey can be found in **Appendix C**, which includes the reports and consultation documentation associated with the 2018 intensive survey and 2020 archaeological resources survey. Historic resources are shown on **Figure 4.3**.

4.5.2 Environmental Consequences

There are three uses of Section 4(f) resources that are considered:

- **Physical Use:** Actual physical taking of a Section 4(f) property, physical occupation of all or a portion of the property, or alteration of structures or facilities located on the property.
- **Temporary Use:** Temporary use of a Section 4(f) resource that is adverse.
- **Constructive Use:** Direct or indirect impacts that substantially impair the activities, features and/or attributes of a Section 4(f) resource. This means that the value of the Section 4(f) resource, in terms of its prior significance and enjoyment, is substantially reduced or lost as a result of the Proposed Action.

According to the Desk Reference for FAA Order 1050.1F, the FAA may make a *de minimis* impact determination with respect to a physical use of Section 4(f) property if, after taking into account any measures to minimize harm, the result is either:

- A determination that the project would not adversely affect the activities, features, or attributes qualifying a park, recreation area, or wildlife or waterfowl refuge for protection under Section 4(f); or
- A Section 106 finding of no adverse effect or no historic properties affected.

The Proposed Action would not result in changes to flight tracks, number of aircraft operations, or types of aircraft operating at the Airport.

Recreation Resources

All recreation resources in the vicinity of the Airport are located outside of the project area and would not be affected by the land acquisition or 10.4-acre aviation development area. The closest recreational resource is the Broadford/River Street Loop Trail, which passes an area adjacent to the southwest corner of the proposed 386-acre acquisition area. However, the acquisition area does not include the roadway/trail. The acquisition of the 386 acres would not result in a use of the Broadford/River Street Loop Trail as no portion of the road/trail would be acquired and access to the road/trail would not be affected.

The Proposed Action, including the acquisition of 386 acres and the 10.4-acre aviation development area, would not result in a use through permanent incorporation/easement or temporary occupancy of a recreational 4(f) resource because all recreational resources, including trails, trail heads, parks, and all other recreation resources are outside of the area proposed for acquisition.

Similarly, there would not be a constructive use of any recreation resources because there would be no impairments, changes in accessibility, or other impacts to recreational resources.

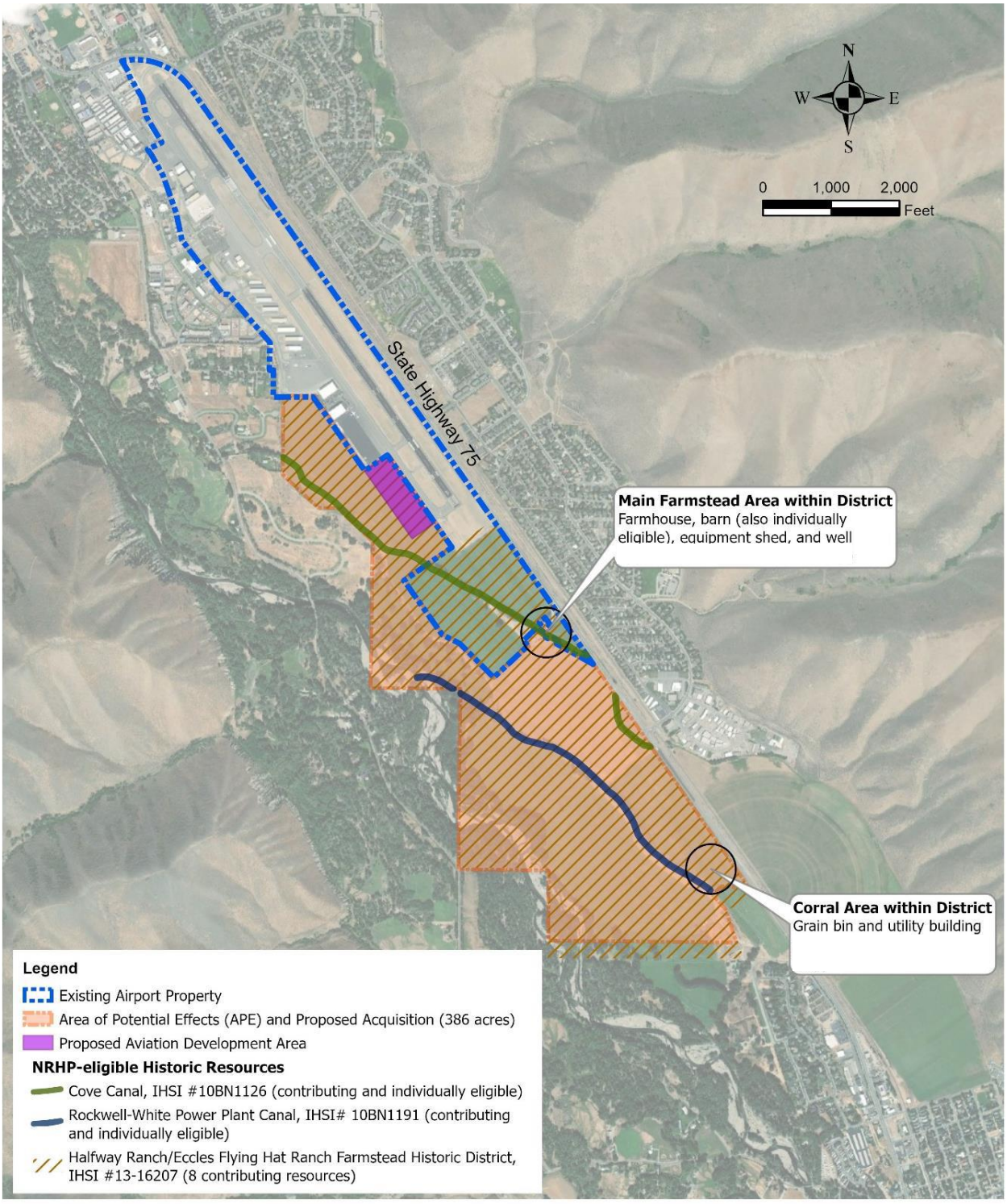

Figure 4.3 Historic Resources

Historic Resources

State Highway 75 is adjacent to but not within the area of impact for the Proposed Action. Therefore, the Proposed Action, which includes land acquisition and development of 10.4 acres, would have no use of State Highway 75.

The entire Proposed Action is located within the historic boundary of the Halfway Ranch/Eccles Flying Hat Ranch Historic District (District), and the property proposed for acquisition includes a large portion of the District. The District encompasses approximately 480 acres on the west side of State Highway 75 immediately south and west of the Airport and includes eight contributing resources that date from the 1880s to the 1950s, including a farmhouse, barn (individually eligible), equipment shed, grain bin, utility building, well, Cove Canal (individually eligible), and the Rockwell-White Power Plant Canal (individually eligible). With the exception of the 10.4-acre aviation development area, the acreage in the District is planned to remain in agricultural use with no direct effects on the eight contributing resources, including the individually eligible properties, or the landscape or spatial elements that contribute to the historic character of the District. Contributing resources associated with the District would remain in place and are not proposed for removal or demolition.

The 10.4-acre aviation development area is also within the District and is located immediately adjacent to existing aviation development along the west side of the existing runway. The Proposed Action would develop 10.4 acres to construct aircraft parking apron, hangars, vehicle access, and vehicle parking. This acreage represents two percent of the acreage within the District. It contains no contributing resources, landscape elements, or individually eligible properties in the District.

The Idaho SHPO agreed the results of the 2018 intensive survey could be used to prepare an assessment of effects for the District for the Proposed Action.

A report titled, *Assessment of Effects for the Halfway Ranch/Eccles Flying Hat Ranch Farmstead Historic District* (Report) provided an evaluation of the effects of the Proposed Action on the District. The Proposed Action would have no adverse effect on the associative and historic characteristics that qualify the District (IHSI #13-16207) as eligible for listing in the NRHP. The determination of no adverse effect under Section 106 for the properties reflects a conclusion that the effects would not alter, directly or indirectly, any of the characteristics of the historic properties that qualify the properties for inclusion in the NRHP in a manner that would diminish the integrity of the properties' location, design, setting, materials, workmanship, feeling, or association as described in 36 CFR 800.5(a)(1). After acquisition of 386 acres of the District, the property would continue to be leased for agricultural use, except for the 10.4-acre development area, which represents a small percentage of the District, contains no contributing resources or NRHP-eligible resources, and is adjacent to the Airport and existing Airport features.

Additionally, the Report concluded that the Proposed Action would have no adverse effect on the individually eligible barn, Cove Canal (IHSI #10BN1126), and Rockwell-White Power Plant Canal (IHSI #10BN1191). Upon completion of the project, the District, including its contributing resources and individually eligible properties, would retain historic character and continue to contribute to the District and convey historical significance and a direct association with agricultural development in the Wood River Valley. **Appendix C** contains the Report. In a letter dated October 12, 2021, the FAA made a determination of **No Historic Properties Adversely Affected** due to the proposed project for land acquisition and development at the Airport. SHPO provided written concurrence with the determination in a letter dated November 1, 2021. **Appendix C** contains copies of the correspondence.

Because the Proposed Action would have no adverse effect on historic resources, the FAA determined that impacts to the historic resources, including the District and the eight contributing resources including a farmhouse, barn

(individually eligible), equipment shed, grain bin, utility building, well, Cove Canal (individually eligible), and the Rockwell-White Power Plant Canal (individually eligible), would be ***de minimis*** under Section 4(f) for the Proposed Action. The FAA prepared a DOT Section 4(f) Evaluation and Finding for the project, which is included as **Appendix D**.

4.5.3 Mitigation

The FAA made a *de minimis* finding in relation to impacts on the District, and no mitigation is required.

However, the Airport Sponsor has agreed to include a condition in future lease agreements for the property requiring the use and maintenance of the contributing and NRHP-eligible resources to the District to be in compliance with the requirements and guidance of the Idaho State Historic Preservation Office (SHPO) and that any construction or improvements on contributing or individually eligible buildings and structures be done with the approval of the Airport, in consultation with SHPO, and according to the Secretary of the Interior's Standards for Rehabilitation. This agreement by the Sponsor will be included in any NEPA decision document relating to the Proposed Action, and included as a special condition describing required environmental mitigation in any future FAA grant for acquisition of the property acquired under the Proposed Action.

4.5.4 Significance Threshold and Conclusions

FAA Order 1050.1F, Exhibit 4-1 provides the FAA's significance threshold for Section 4(f) resources. This states a significant impact would occur if, "The action involves more than a minimal physical use of a Section 4(f) resource or constitutes a "constructive use" based on an FAA determination that the aviation project would substantially impair the Section 4(f) resource." A substantial impairment occurs when the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished.

Under the No Action Alternative, Section 4(f) resources would remain as they presently exist and would result in no use of Section 4(f) properties as a result of FMAA or FAA actions. However, the potential exists that the property would be sold to a private entity, which could result in modifications to the District that affect its eligibility for listing on the NRHP.

The Proposed Action would result in no use of recreational resources or State Highway 75, as none of these resources are within an area that would experience any construction-related impacts, and no impacts were identified that would substantially impair the activities, features, and/or attributes of these resources.

The Proposed Action would result in **no adverse effect on historic properties** under Section 106 of the National Historic Preservation Act (NHPA). Land acquisition would bring a large portion of the District into Airport property for protection of approach and departure surfaces. However, with the exception of the development of approximately 10.4 acres of property immediately adjacent to the Airport, the remaining 375.6 acres of the property proposed for acquisition would continue to be leased for agricultural use. FMAA has agreed to include a special lease provision in future agricultural lease agreements to provide for the maintenance of contributing elements of the property in the District.

SHPO has concurred with the FAA determination of **No Historic Properties Adversely Affected** due to the Proposed Action. After careful and thorough evaluation, the FAA made a ***de minimis*** finding for Section 4(f) historic resources.

4.6 Farmlands

The Farmland Policy Protection Act (FPPA) was enacted to protect farmland from unnecessary and permanent conversion to non-agricultural use. Farmlands are protected under the FPPA by the Natural Resources Conservation Service (NRCS), a service of the United States Department of Agriculture (USDA). The NRCS publishes an inventory of prime and unique farmland in the United States.

Prime farmland has the best combination of physical and chemical (soil) characteristics for producing food, fiber, and other crops. The FPPA is not applicable to lands within urban development or used for water storage. Any federal action that may convert farmland to non-agricultural use requires FPPA coordination with the NRCS.

4.6.1 Affected Environment

The NRCS Web Soil Survey (WSS)[19] indicates that, of the 386 acres proposed for acquisition, 212 acres, including the 10.4 acres proposed for aviation development, are classified as "Important Farmland (Prime Farmland if Irrigated)" based on soil types (**Figure 4.4**). The project area has an extensive irrigation system throughout the pasturelands. The 10.4 acres proposed for aviation development are actively irrigated, used for agricultural purposes, and considered Prime Farmland.

4.6.2 Environmental Consequences

Under the Proposed Action, approximately 386 acres of land would be acquired, of which 375.6 acres would remain unchanged with agricultural use/irrigated pastureland throughout much of the project area; these acres would continue to be irrigated and would remain "Prime Farmland." The remaining 10.4 acres would be developed as aviation facilities with pavements and hangars, converting these acres from "Prime Farmland" to "Not Prime Farmland." This removal is necessary to meet project Purpose and Need (**Chapter 2**) by replacing general aviation apron space that was lost during the 2015 development project, which addressed safety area deficiencies and relocated Taxiway B and expanding facilities to more efficiently meet current and future demand for apron and aircraft hangars.

The 10.4 acres converting to "Not Prime Farmland" represents approximately 1.4 percent of the total farm acreage (approximately 743.5 acres), 2.6 percent of the property proposed for acquisition (386 acres), and 4.9 percent of the prime farmland within the property proposed for acquisition. A Farmland Conversion Impact Form was completed for the Proposed Action to determine the level of impact to Prime Farmland and the NRCS was consulted in April 2021 (**Appendix E**). Based on the current location of the farmland to be converted (adjacent to the runway), and the small percentage of the area being converted, among other factors, the site scored 109 points out of 260 points on the Farmland Conversion Impact Form.

[19] NRCS. 2021. Web Soil Survey. U.S. Department of Agriculture, Natural Resources Conservation Service, https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm

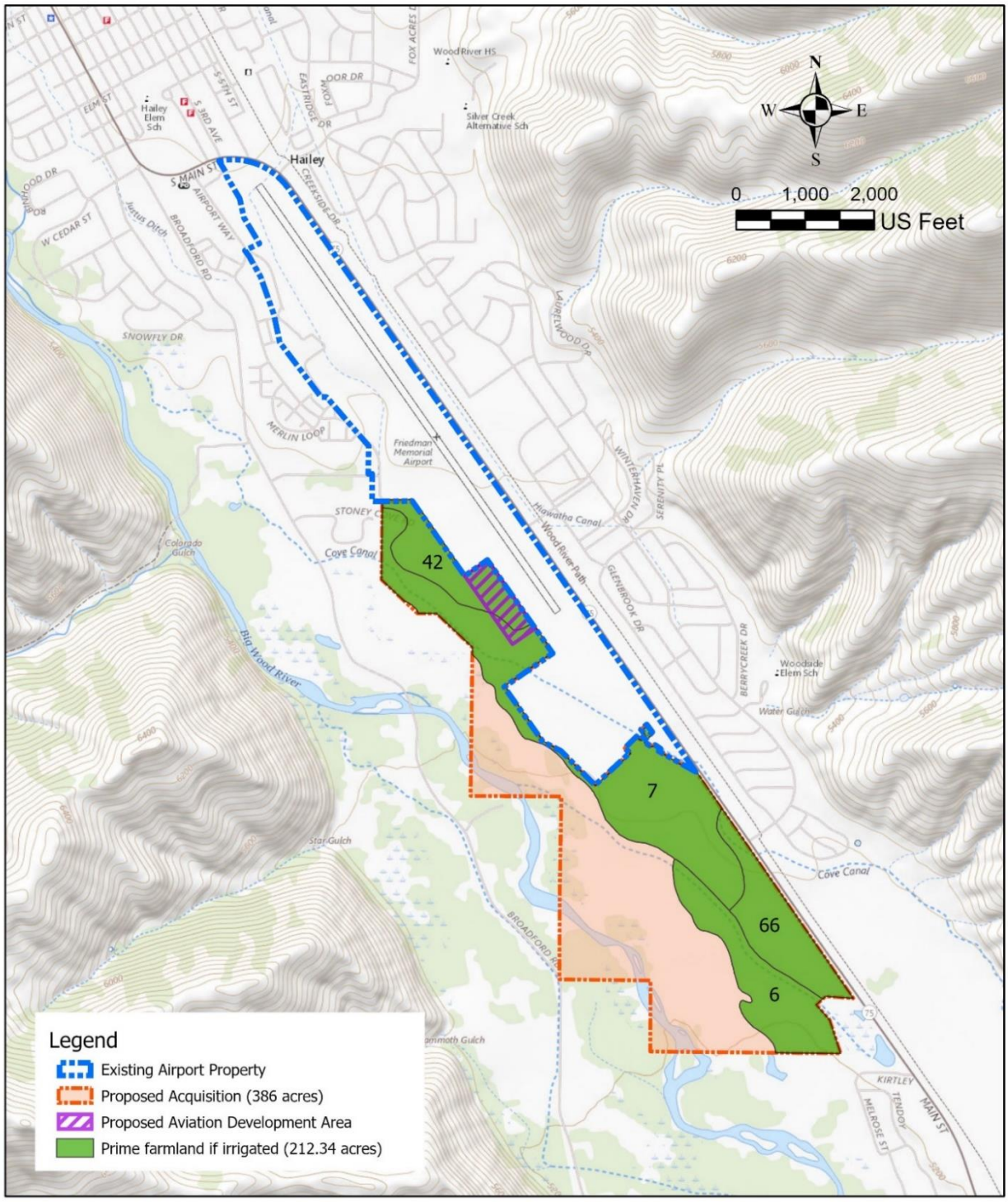

Figure 4.4 Farmland Classification in Proposed Acquisition Area

4.6.3 Mitigation

Farmland areas protected under the FPPA would have no impact under the No Action Alternative and have no significant effect under the Proposed Action. Therefore, no mitigation is required.

4.6.4 Significance Threshold and Conclusions

FAA Order 1050.1F, Exhibit 4-1 provides the FAA's significance threshold for farmlands. If an action has the potential to convert important farmlands to non-agricultural uses, the action would have an impact on farmlands. If the site receives a score of less than 160 points, the potential impacts are not considered to be significant and further evaluation is not required. If the site receives a total score of more than 160 points, it would be given increasingly higher levels of consideration for protection. If the site receives a score of more than 200 points, it is considered to have a significant impact on farmlands.

The No Action Alternative would have **no effect** on "Important Farmland" resources under the FPPA because it is a non-development alternative.

Under the Proposed Action, approximately 386 acres of land would be acquired, of which 375.6 acres would remain in agricultural use/irrigated pasture. The remaining 10.4 acres would be developed as aviation facilities with pavements and structures, converting these acres from "Prime Farmland" to "Not Prime Farmland." Based on the score of 109 on the Farmland Conversion Impact Form, the Proposed Action is below the significance threshold per FAA Order 1050.1F, and no further evaluation is required. Therefore, the Proposed Action would result in **no significant effect** on farmlands.

4.7 Hazardous Materials, Solid Waste, and Pollution Prevention

Management of solid waste and hazardous materials, chemicals, substances, and wastes are subject to federal regulation to prevent pollution. Hazardous materials are products or waste regulated by the Environmental Protection Agency (EPA) and the Idaho Department of Environmental Quality (IDEQ). These include substances regulated under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and regulations for solid waste management, above ground storage tanks and underground storage tanks (USTs).

4.7.1 Affected Environment

Phase I Environmental Site Assessments (Phase I ESAs) were conducted to identify potential contaminated sites within the Project Area (**Appendix F**). The Phase I ESA Report/Hazardous Material Evaluations dated July 2017 and May 2019 were prepared for the previous purchase of a 64-acre parcel from Halfway Ranch/Eccles Flying Hat Ranch. A Phase I ESA was prepared in July 2021 for the Proposed Action, including the acquisition of 386 acres and development of 10.4 acres.

The Phase I ESAs included pedestrian surveys of the property and a review of regulatory databases and information provided by the Airport. A site visit was conducted between September 28 and 30, 2020, to survey the project area. The 386 acres proposed for acquisition consist of ranch property, including pastureland for cattle and horse grazing. Several irrigation piping systems and wellheads for the irrigation system were located. The airport property is fenced and constitutes the northeastern boundary of the area proposed for acquisition. An irrigation ditch/swale and Cove Canal are notable water features. The Ranch includes a house and outbuildings, which are located south of the Airport. Several elevated above-ground storage tanks and 55-gallon drums containing

materials for routine ranching activities were noted. Materials noted on-site within and adjacent to buildings included fuel, oil, herbicides, pesticides, and fertilizers. As noted in the 2017 Phase I ESA, the individual sewer system for the ranch house and above ground storage tanks appeared in good working order.

The current and historic agricultural materials used throughout the 386 acres property proposed for acquisition included routine materials such as fuel, oil, herbicides, pesticides, and fertilizers. When used per the manufacturer instructions and for their intended use, these chemicals are not known to be hazardous when correctly applied with the appropriate protective measures. The Phase I ESAs found no evidence of an existing release, past release, or material threat of a release of any hazardous substances or petroleum products, which would qualify as a recognized environmental condition (REC) or an historic recognized environmental condition (HREC). Likewise, the assessment found no evidence of controlled recognized environmental conditions (CRECs), in which hazardous substances or petroleum products were released but allowed to remain in place, subject to implementation of the required controls by the applicable regulatory authority. Hazardous substances as defined by CERCLA and RCRA were not identified within the 367 acres proposed for acquisition. There is no on-going remediation within the property proposed for acquisition. Potential off-site historical sources of contamination were identified in a database search, specifically the Airport and Sun Valley Aviation (an airport Fixed Based Operator; FBO).

The September 2020 site visit noted airport activities adjoining the 10.4 acres proposed for aviation development included the runway area and general aviation FBO buildings and apron areas. Materials stored outside on the apron areas included small equipment and several small-capacity portable fuel tanks. Spills or releases of materials were not noted during the site visit.

Solid waste generated at the Airport is collected from the facility and hauled to the Ohio Gulch Transfer Station operated by Southern Idaho Solid Waste and located eight miles north of the Airport. At the transfer station, the material is combined with waste from other sources, and then it is transferred to the Southern Idaho Solid Waste Milner Butte Landfill, 95 miles south of the Airport. In 2019, the landfill was estimated to have 40 years of capacity remaining at its current site.

4.7.2 Environmental Consequences

Both current and historic use of fuel, pesticides, herbicides, fertilizers, and other chemicals are part of the agricultural operation within the project area. If hazardous materials or petroleum products are encountered during development of the 10.4-acre aviation development area, though unlikely because no known development has occurred on the site, the appropriate agencies will be notified, and the materials will be properly disposed of by certified personnel at an appropriately permitted facility.

Properties outside of the 10.4-acre aviation development area would not be disturbed by the project, and the operation of the property for agricultural purposes would continue. The Proposed Action would generate solid waste during construction and operation of the 10.4-acre aviation development area; it may generate a small quantity of hazardous waste. The solid waste stream would include general municipal solid waste generated by construction activities (for example, building materials), by tenants, and by airport operations related to maintenance of the area. However, the quantity of either of these streams would not impact environmental resources nor exceed the disposal facilities abilities to accept these materials.

4.7.3 Mitigation

While no specific mitigation is required, if hazardous substances are encountered during any phase of construction, work will cease in the vicinity of the material, and the IDEQ will be contacted immediately to coordinate appropriate handling and disposal action. BMPs will be employed to prevent, minimize, and control the potential release of petroleum materials during construction of the aviation development area. Examples of typical BMPs include regular inspection of equipment for leaks with immediate repair, the use of spill response kits as needed, and ensuring that all spent fluids including motor oil, radiator coolant, or other fluids and used vehicle batteries are collected, stored, and recycled as hazardous waste off site.

4.7.4 Significance Threshold and Conclusions

The FAA has not established a significance threshold for hazardous materials, solid waste, or pollution prevention. However, it has identified factors to consider in evaluating the context and intensity of the potential environmental impacts. These factors include situations in which the Proposed Action or Alternative would have the potential to:

- Violate applicable federal, state, tribal, or local laws or regulations regarding hazardous materials and solid waste management.
- Involve a contaminated site (e.g., a site listed on the National Priorities List).
- Produce an appreciably different quantity or type of hazardous waste.
- Generate an appreciably different quantity or type of solid waste or use a different method of collection or disposal and/or would exceed local capacity.
- Adversely affect human health and the environment.

The No Action Alternative would have **no effect** on hazardous materials, solid waste, or pollution prevention activities because there would be no change in generation, use, and disposal of wastes. Hazardous materials, solid waste, or pollution prevention activities would remain as they presently exist.

The Proposed Action is expected to have **no significant effect** on hazardous materials, solid waste, or pollution prevention activities. The Phase I ESAs found no evidence of existing hazardous waste sites, including RECs, HRECs, or CRECs. Proper use, storage, inspection, and maintenance of construction equipment used to construct the aviation development area would prevent potential releases of petroleum materials or other hazardous materials. The operation of vehicles, aircraft, and buildings within the aviation development area would be managed appropriately to prevent the release of hazardous materials.

4.8 Historical, Architectural, Archaeological, and Cultural Resources

Cultural resources are locations of human activity, occupation, or use identifiable through field inventory, historical documentation, or oral evidence. The term “cultural resources” includes archaeological, historical, or architectural sites, structures, or places with important public and scientific uses and may include definite locations (sites or places) of traditional cultural or religious importance to specified social and/or cultural groups.

Regulations were promulgated to protect archaeological and historical resources. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their actions on historic properties. Section 106 also requires federal agencies to consult with State and Tribal Historic Preservation Offices and other appropriate parties regarding the identification and evaluation of historic properties, assessment of

effects on historic properties, and the resolution of adverse effects and to consult with appropriate Native American tribes.

For the purposes of Section 106, historic properties are defined as prehistoric and historic sites, buildings, structures, districts, landscapes, and objects that are either eligible for or listed in the National Register of Historic Places (NRHP), as well as artifacts, records, and remains related to such properties. Historic properties can also include those cultural resources that are associated with the cultural practices or beliefs of a living community. Historic properties must demonstrate importance in history, architecture, archaeology, engineering, or culture and meet one or more of the significance criteria identified under Section 106:

- **Criterion A** – Sites and/or structures associated with events that have made a significant contribution to broad patterns in history.
- **Criterion B** – Sites and/or structures associated with the lives of persons significant in our past.
- **Criterion C** – Sites and/or structures that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

In addition to demonstrating significance, an historic property must demonstrate integrity. The seven aspects of integrity include location, setting, design, materials, workmanship, feeling, and association.

4.8.1 Affected Environment

The Area of Potential Effect (APE) under Section 106 encompasses 386 acres of agricultural land proposed for acquisition that lies immediately adjacent to the Airport (**Figure 4.5**).

Survey, documentation, and evaluation of historic properties within the project area was completed per Section 106 of the National Historic Preservation Act (Section 106) in 2018 in the cultural resources survey report titled Friedman Memorial Airport Land Acquisition and Obstruction Removal (herein referred to as the 2018 intensive survey). The acreage proposed for acquisition is located within the historic boundary of the Halfway Ranch/Eccles Flying Hat Ranch Historic District (District), which had been previously determined eligible for listing in the NRHP. Built environment resources within the project area relate to agriculture and are limited to the contributing resources and individual properties eligible for listing on the NRHP within the District, which include a farmhouse, barn, equipment shed, grain bin, utility building, well, and Cove Canal. The barn, Cove Canal, and Rockwell-White Power Plant Canal are individually eligible for listing in the NRHP. The 2018 intensive survey can be found in **Appendix C**.

State Highway 75, which is adjacent to but outside the project area, was also identified in the 2018 intensive survey and determined to be an NRHP-eligible property. State Highway 75 is a two-lane historic highway that travels north-south along the eastern side of the Airport.

Within the 386-acre area proposed for acquisition, the following historic resources were determined to be NRHP-eligible resources:

- Cove Canal (10BN1126)
- Halfway Ranch/Eccles Flying Hat Ranch Historic District (13-16207) (west of Highway 75)
- Rockwell-White Power Plant Canal (10BN1191)
- Barn (Previously recorded as a part of the SH-75 EIS)

A description of these historic resources can be found in **Section 4.5.1**, and they are shown on **Figure 4.3**.

An archaeological survey was conducted for the 10.4-acre aviation development area in November 2020. No prehistoric or Native American resources were documented as part of the archaeological survey. The archaeological survey can be found in **Appendix C**.

The FAA sent a letter with the archaeological survey to the Shoshone Bannock Tribes inviting Government-to-Government consultation on the Proposed Action. The letter was dated August 18, 2021, and the letter's purpose was to seek input on properties of cultural or religious significance that may be affected by the Proposed Action and invite tribal participation in government-to-government consultation in the Section 106 process. No response was received from the Tribes. The archaeological survey and letter to the Shoshone Bannock Tribes can be found in **Appendix C**.

4.8.2 Environmental Consequences

Due to the absence of any archaeological or cultural resources being identified in either the 2018 intensive survey or the archaeological survey of the 10.4-acre aviation development area, the Proposed Action is unlikely to affect these resources.

In accordance with Executive Order 13175, Consultation and Coordination with Indian and Tribal Governments and FAA Order 1210.20, American Indian and Alaska Native Tribal Consultation Policy and Procedures, the FAA sent a letter to the Shoshone Bannock Tribes inviting Government-to-Government consultation on the Proposed Action (**Appendix C**). The letter was sent to initiate consultation in accordance with Section 106 of the NHPA and implementing regulations 36 CFR Part 800 to seek input on properties of cultural or religious significance that may be affected by the undertaking. The Tribes did not respond with any comments or concerns about the Proposed Action or identify any properties of cultural or religious significance.

The following discussion outlines the Section 106 process for assessing the effects the Proposed Action would have on historic properties. Resources that are listed in or eligible for the NRHP are considered in the Section 106 process by a qualified professional. Ultimately, FAA officials make the Section 106 effect determination and coordinate with the Idaho SHPO. The effects determination will consider both direct and indirect impacts from construction and operation activities. Effects determinations make one of the following conclusions:

- No effects, historic properties are not present in the area of potential impact, or the project does not impact resources – Section 106 of the NRHP is not applicable.
- No adverse effect on historic properties – Section 106 of the NRHP applies, but the project does not have a negative effect on the historic property.
- Adverse effect on historic properties – Section 106 of the NRHP applies and evaluations of measures to avoid, minimize, or mitigate impacts to the historic property will need to be considered.

State Highway 75 is adjacent to but not within the area of impact for the Proposed Action. Therefore, the Proposed Action, which includes land acquisition and development of 10.4 acres, would have no effect on State Highway 75.

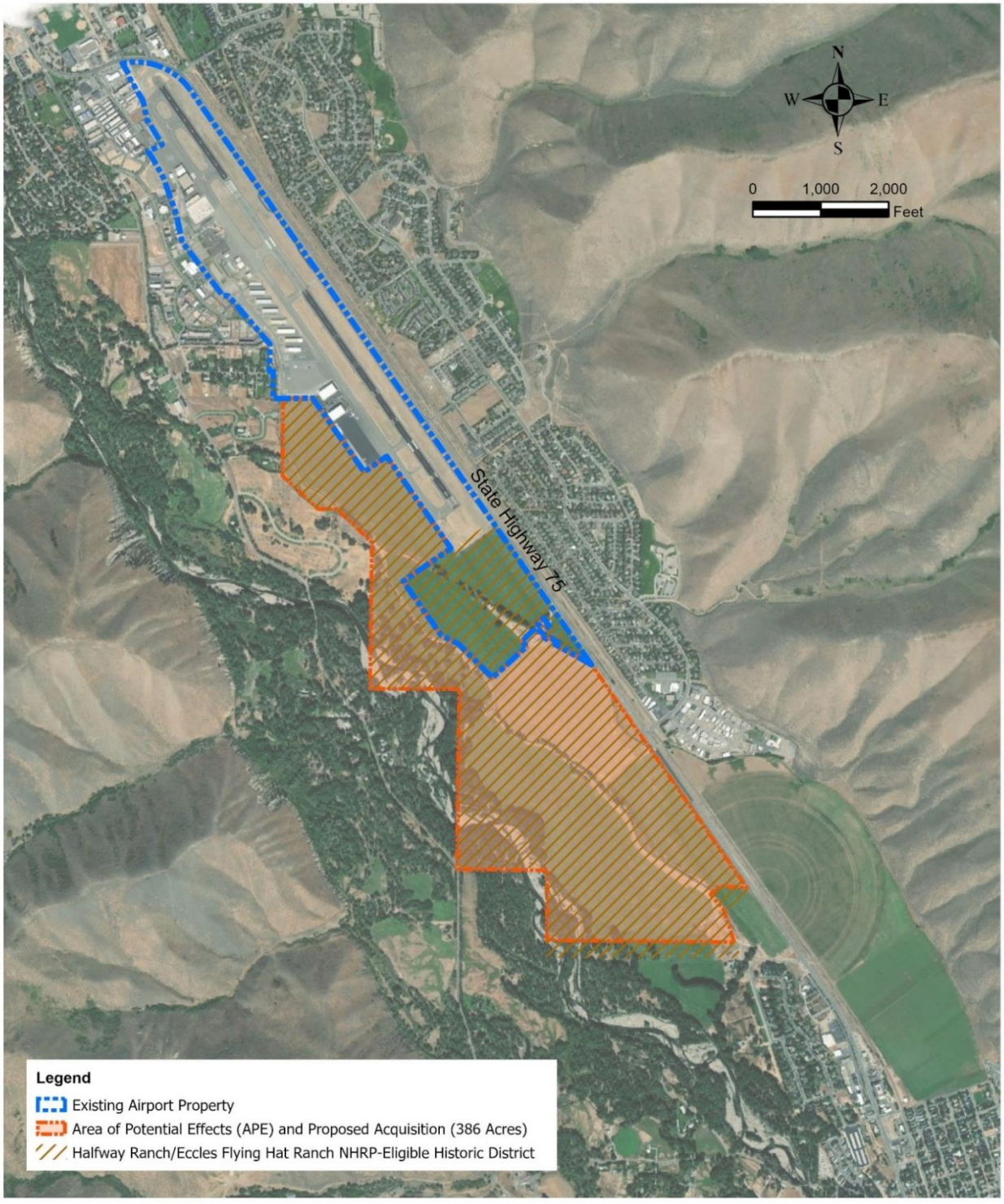

Figure 4.5 Area of Potential Effect

The entire Proposed Action is located within the historic boundary of the Halfway Ranch/Eccles Flying Hat Ranch Historic District (District), and the property proposed for acquisition includes a large portion of the District. The District encompasses approximately 480 acres on the west side of State Highway 75 immediately south and west of the Airport and includes eight contributing resources that date from the 1880s to the 1950s, including a farmhouse, barn (individually eligible), equipment shed, grain bin, utility building, well, Cove Canal (individually eligible), and the Rockwell-White Power Plant Canal (individually eligible). With the exception of the 10.4-acre aviation development area, the acreage in the District is planned to remain in agricultural use with no direct effects on the eight contributing resources, including the individually eligible properties, or the landscape or spatial elements that contribute to the historic character of the District. Contributing resources associated with the District would remain in place and are not proposed for removal or demolition.

The 10.4-acre aviation development area is also within the District and is located immediately adjacent to existing aviation development along the west side of the existing runway. The Proposed Action would develop 10.4 acres to construct aircraft parking apron, hangars, vehicle access, and vehicle parking. This acreage represents two percent of the acreage within the District. It contains no contributing resources, landscape elements, or individually eligible properties in the District.

The Idaho SHPO agreed the results of the 2018 intensive survey could be used to prepare an assessment of effects for the District for the Proposed Action.

A report titled, *Assessment of Effects for the Halfway Ranch/Eccles Flying Hat Ranch Farmstead Historic District* (Report) provided an evaluation of the effects of the Proposed Action on the District. The Proposed Action would have no adverse effect on the associative and historic characteristics that qualify the District (IHSI #13-16207) as eligible for listing in the NRHP. The determination of no adverse effect under Section 106 for the properties reflects a conclusion that the effects would not alter, directly or indirectly, any of the characteristics of the historic properties that qualify the properties for inclusion in the NRHP in a manner that would diminish the integrity of the properties' location, design, setting, materials, workmanship, feeling, or association as described in 36 CFR 800.5(a)(1). After acquisition of 386 acres of the District, the property would continue to be leased for agricultural use, except for the 10.4-acre development area, which represents a small percentage of the District, contains no contributing resources or NRHP-eligible resources, and is adjacent to the Airport and existing Airport features.

Additionally, the Report concluded that the Proposed Action would have no adverse effect on the individually eligible barn, Cove Canal (IHSI #10BN1126), and Rockwell-White Power Plant Canal (IHSI #10BN1191). Upon completion of the project, the District, including its contributing resources and individually eligible properties, would retain historic character and continue to contribute to the District and convey historical significance and a direct association with agricultural development in the Wood River Valley. **Appendix C** contains the Report.

In a letter dated October 12, 2021, the FAA made a determination of **No Historic Properties Adversely Affected** due to the proposed project for land acquisition and development at the Airport. SHPO provided written concurrence with the determination in a letter dated November 1, 2021. **Appendix C** contains copies of the correspondence.

4.8.3 Mitigation

The FAA made a determination of No Historic Properties Adversely Affected due to the Proposed Action for land acquisition and development at the Friedman Memorial Airport (Airport), and no mitigation is required.

However, the Airport Sponsor has agreed to include a condition in future lease agreements for the property requiring the use and maintenance of the contributing and NRHP-eligible resources to the District to be in compliance with the requirements and guidance of the Idaho State Historic Preservation Office (SHPO) and that any construction or improvements on contributing or individually eligible buildings and structures be done with the approval of the Airport, in consultation with SHPO, and according to the Secretary of the Interior's Standards for Rehabilitation. This agreement by the Sponsor will be included in any NEPA decision document relating to the Proposed Action, and included as a special condition describing required environmental mitigation in any future FAA grant for acquisition of the property acquired under the Proposed Action.

In the event that construction activities encounter any previously unrecorded archaeological or cultural deposits, the contractor will terminate all operation in that immediate area (100-foot radius [30 meters]) until the FAA notifies the SHPO. Any unanticipated discoveries will be left in place pending further evaluation and consultation with the SHPO and interested Native American tribes (if appropriate).

4.8.4 Significance Threshold and Conclusions

The FAA does not provide a significance threshold for historical, architectural, archeological, and cultural resources. However, it does provide factors to consider in evaluating the context and intensity of the potential impact an action would have on these resources. These factors include the determination for the action through the Section 106 process (no historic properties affected, no adverse effect, or adverse effect) and if the action involves more than a minimal use of a Section 4(f) resource.

The No Action Alternative would have **no effect** on historical, architectural, archeological, or cultural resources.

The Proposed Action would result in **No Historic Properties Adversely Affected** due to the Proposed Action under Section 106 of the NHPA. Land acquisition would bring a large portion of the District into airport property for protection of approach and departure surfaces. However, with the exception of the development of approximately 10.4 acres of property immediately adjacent to the Airport, the remaining 375.6 acres of the property proposed for acquisition would continue to be leased for agricultural use. The FMAA has agreed to include a special lease provision in future agricultural lease agreements to provide for the maintenance of contributing elements of the property in the Historic District.

SHPO has concurred with the FAA determination of No Historic Properties Adversely Affected due to the Proposed Action.

4.9 Land Use

Existing and planned land uses in the vicinity of an airport have the potential to impact aviation operations, and aviation operations have the potential to impact land uses. Incompatible land uses include certain residential, business, institutional, and telecommunication facilities; wildlife attractants; and some surface transportation infrastructure that create conflicts to the protection of aircraft and people and property on the ground. (Note that Aircraft noise impacts on neighboring land use are discussed in **Section 4.11**). To identify potential land use conflicts caused by the Proposed Action, an evaluation of the local land use controls was completed.

4.9.1 Affected Environment

The Airport is located in Blaine County, Idaho, and encompasses approximately 275 acres of land owned by the City of Hailey. The City of Hailey has zoned lands west and north of the Airport for industrial and business uses; east across Highway 75, for "Recreational Green Belt," residential, and business; and the parcel proposed for acquisition under the Proposed Action is zoned as agricultural/residential (**Figure 4.6**).

The City of Hailey Zoning Ordinance Article 4, Section 4.11 establishes Airport property as the "Airport District" for the purpose of allowing "regularly scheduled commercial passenger aircraft services to be used by the general public" and "other general aviation services for private aircraft and private aircraft charter only in conjunction with regularly scheduled commercial passenger aircraft services." Article 5 prohibits other zoning districts, such as recreational, residential, business, or industry from use within the Airport District, except where state or federal law otherwise preempts local land use regulation.

The 10.4-acre aviation development area is in part zoned for industrial and in part zoned for esidential/agricultural. The remaining portions of the 386-acre acquisition area is zoned for residential/agricultural.

Blaine County Code, Title 9, Chapter 18, Airport Vicinity Overlay District, establishes a district to prevent encroachment on airspace, to prevent interference from light and electromagnetic sources on runway approaches, and to prevent intensive human use of runway approaches. The Airport Vicinity Overlay District prescribes three geometrically defined areas (**Figure 4.7**):

1. **Runway Proper:** A rectangle whose width is 500 feet and whose length is the maximum planned or foreseeable length of the runway. Permitted uses are only those uses necessary for the operation of the Airport.
2. **Primary Safety Zone:** Within the approach area for the runway. Permitted uses included agriculture, recreation without structures, parks, golf courses, cemeteries, or water impoundments. Accessory uses allowed include buildings or uses on the same premises that are clearly and customarily incidental to the principal permitted use.
3. **Secondary Safety Zone:** Extends beyond the Primary Safety Zone with permitted uses of agriculture recreation, and residential uses. Accessory uses allowed include additional buildings or uses on the same premises that are clearly and customarily incidental to the principal permitted use.

The City of Hailey and Blaine County have joint jurisdictional authority to regulate future land use in Blaine County outside of the city limits through an Area of City Impact Agreement approved and adopted in 1994. Both jurisdictions have recognized that Airport activity and future growth of the Airport need to be protected in terms of public safety.

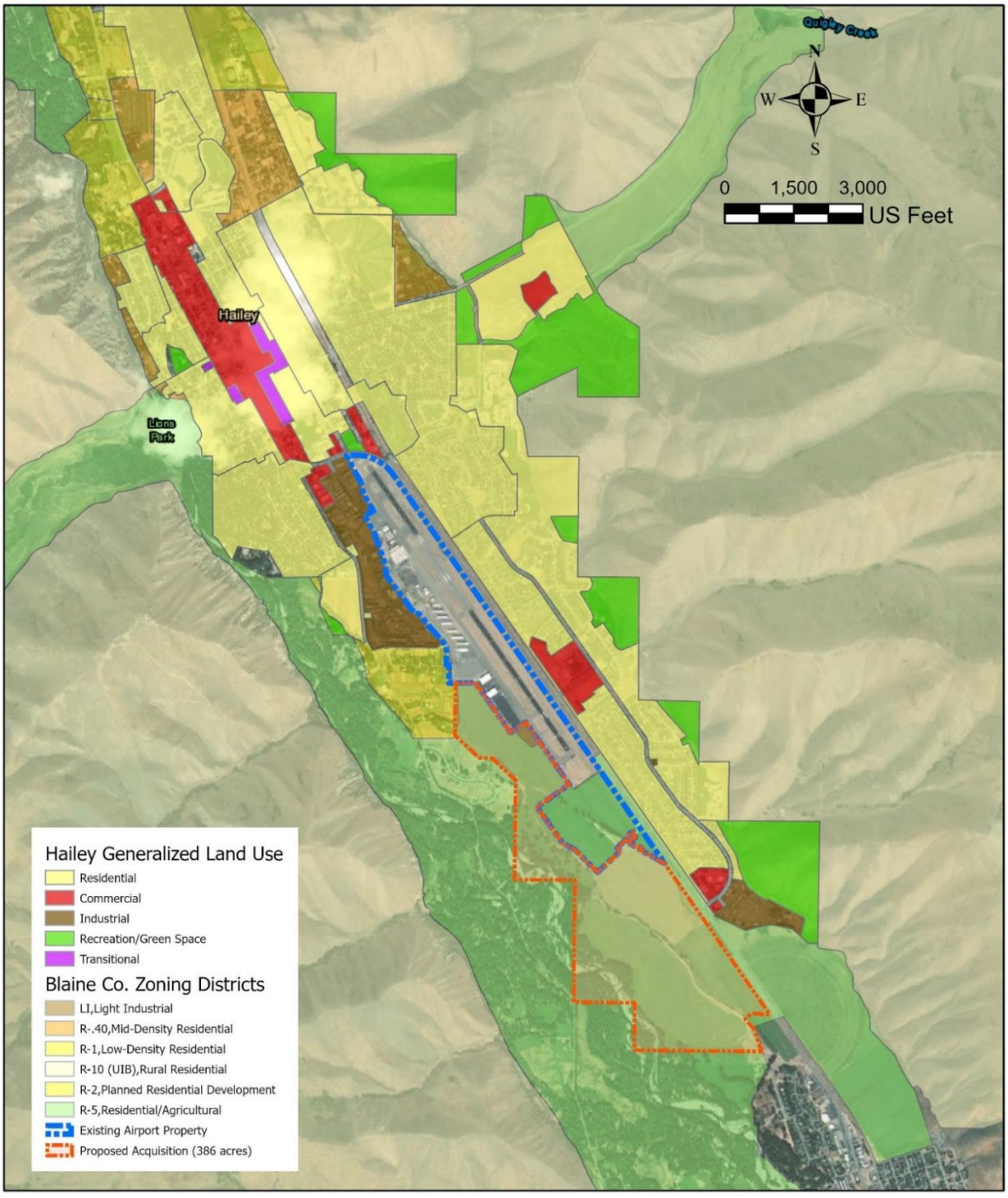

Figure 4.6 Generalized Land Use and Zoning

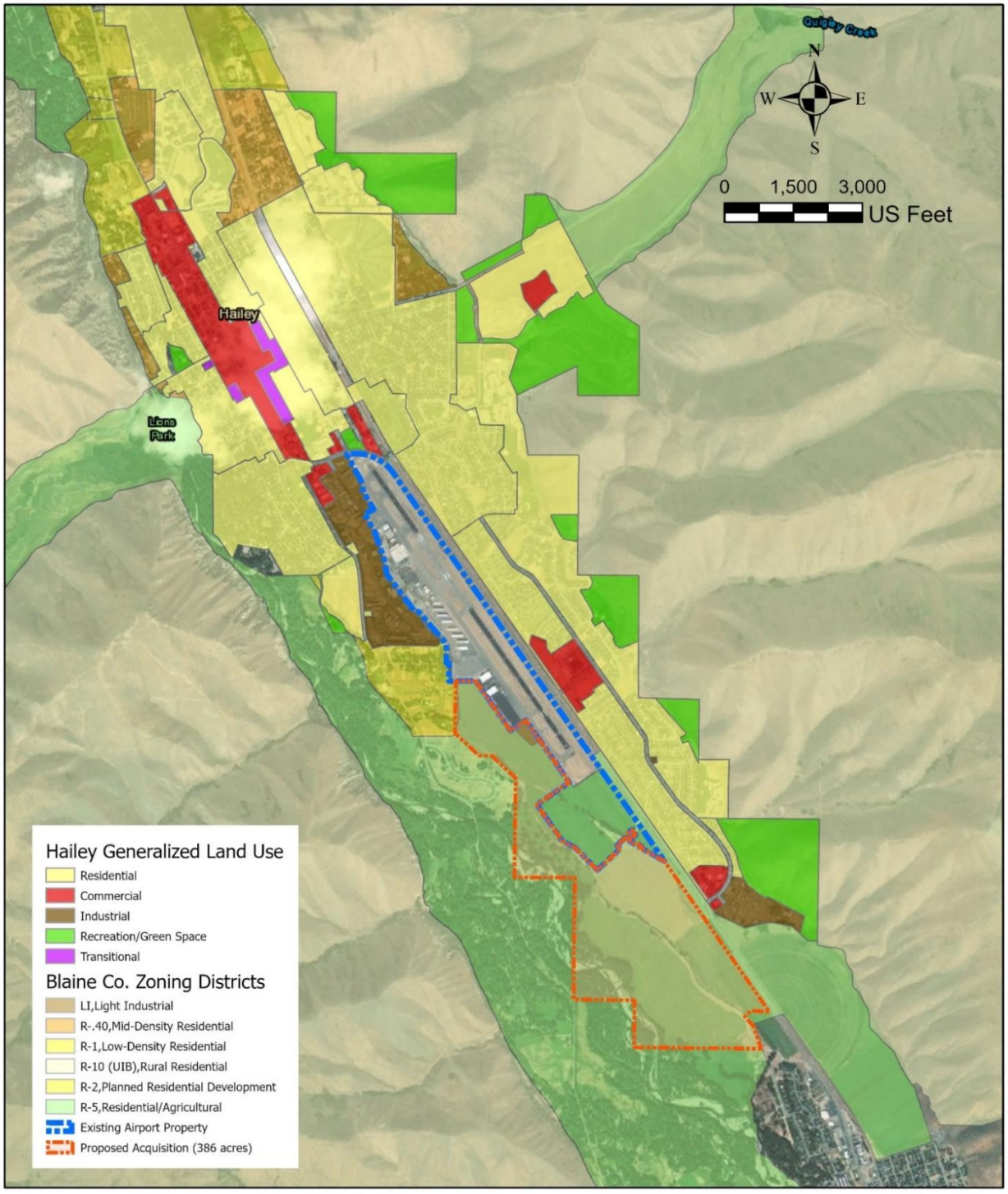

Figure 4.7 Airport Overlay Zones, Proposed Acquisition Area, and Vicinity

Land uses north and east of the Airport are a mixture of residential and commercial uses. Roberta McKercher Park and Hailey Cemetery are located immediately north of the Airport. 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 the Airport is a mixture of light industrial and lower-density residential areas that currently have limited development. Residential land uses are located southeast of the Airport, and land uses are predominantly agricultural and pen/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 Airport. The City of Bellevue is located approximately two miles to the southeast of the Airport. Within the City of Bellevue, the Chantrelle subdivision is the nearest residential land use to the Airport.

4.9.2 Environmental Consequences

The Proposed Action would result in 386 acres being purchased by the FMAA. Except for the 10.4 acres proposed for aviation development, the property would be leased for agricultural operations in keeping with its existing use and in alignment with permitted use under the City of Hailey's Airport District and Blaine County's Airport Vicinity Overlay District. The development of the aviation area would convert 10.4 acres of land from agricultural use to aviation use. The 10.4-acre aviation development area would be incorporated into the Airport District zoning classification. This conversion is consistent with other use in the immediate vicinity and the land uses planned for the Airport District. Zoning for the remaining 375.6 acres would not change.

Acquisition of the 386 acres would provide the FMAA with the ability to protect the airport approach and departure surfaces from development by incompatible land uses, which might involve structures, towers, or vegetation that would potentially penetrate these surfaces and be an obstruction to aircraft operations. The Proposed Action would provide the FMAA with the ability to ensure land uses south of the Airport are congruent with zoning ordinances that specify the need to prevent encroachment on airspace and to meet FAA regulations.

4.9.3 Mitigation

The Proposed Action aligns with current land use planning and zoning requirements; therefore, no mitigation is required.

4.9.4 Significance Threshold and Conclusions

The FAA does not provide a significance threshold or specific independent factors to consider for land use impacts. However, it does state that determining if significant impacts exist is normally dependent on related categories such as aircraft noise, the disruption or relocation of communities, or induced socioeconomic impacts.

The No Action Alternative would have **no effect** on land use. Land use would remain as it presently exists.

Under the Proposed Action, the Airport would acquire land zoned residential/agricultural, and the property is currently used for agriculture and pasture. The Proposed Action would not change the land use within the project area, except for conversion of the 10.4-acre airport development area to apron and hangars, which would be a land use compatible with the Airport. The 10.4-acre aviation development area would be incorporated into the Airport District zoning classification. Zoning for the remaining 375.6 acres would not change. The Proposed Action

would prevent encroachment on airspace, consistent with zoning ordinances. Therefore, the Proposed Action would have **no significant effect** on land use within the vicinity of the Airport.

4.10 Natural Resources and Energy Supply

Efficient use of resources and energy during airport development projects and operations minimizes resulting impacts to environmental resources. Natural resources include those needed to construct and operate new infrastructure (raw materials such as water, asphalt, aggregate, concrete, wood, etc.). Energy (electricity and fuel) is required to construct and operate facilities, aircraft, and ground vehicles.

4.10.1 Affected Environment

The area around the Airport is a well-developed urban and suburban area with adequate access to natural resources for facility operation, aircraft operations, and construction projects, so energy sources are not in short supply in the Wood River Valley from Bellevue to Sun Valley. The facilities at the Airport require water and fuel for general operations, aircraft fueling and maintenance, and Airport vehicles.

The facilities at the Airport require electricity and propane gas for lighting, cooling, and heating. These energy supplies are provided by Idaho Power and local propane providers. In 2020, hydropower accounted for nearly 42 percent of Idaho Power's electricity supply.[20] However, Idaho Power uses a wide variety of electric generation to meet its variable needs, such as from coal, wind, natural gas, and solar.

4.10.2 Environmental Consequences

There are no known natural resource or energy resource shortages for the Airport and surrounding region. The Proposed Action would not result in changes to flight tracks, number of aircraft operations, or types of aircraft operating at the Airport. Acquisition of the 386 acres of property would not change consumption or availability of energy and natural resources. The Proposed Action would not result in operational changes at the Airport, except for the operation of the 10.4-acre aviation development area through actions such as heating of hangar buildings and clearing of snow from apron areas.

Construction materials needed for the 10.4-acre aviation development area would include relatively small quantities of concrete for hangar floors, asphalt for aircraft aprons, and metal, wood, plasterboard, and other typical materials used for pavement and building construction. These materials are not in short supply locally and regionally, and construction of the Proposed Action would not result in shortages. Temporary energy supply resources would be needed to for construction of the 10.4-acre aviation development area. Fuel for construction equipment, typically diesel, is readily available within the Wood River Valley.

4.10.3 Mitigation

There is no mitigation required, as the Proposed Action would not result in a notable consumption of natural resources. BMPs during construction will be employed where applicable. To reduce already insignificant energy consumption associated with the temporary construction activities associated with the Proposed Action, construction equipment will be in good working order to ensure the most efficient use of fuel. All vehicles and equipment will be checked for leaks and repaired immediately. In addition, construction equipment will not be kept idling more than necessary.

[20] Idaho Power. 2020. Energy Sources. Accessed January, 2022 at https://www.idahopower.com/energy/delivering-power/energy-sources/.

4.10.4 Significance Threshold and Conclusions

The FAA has not established a significance threshold for natural resources and energy supply. However, it does provide a number of factors to consider in evaluating the context and intensity of the potential impacts. These factors include situations involving demands on natural resources or energy that exceed the available or future supply of these resources.

The No Action Alternative would result in no additional natural resource or energy supply requirements. Therefore, the No Action Alternative would have **no effect** on natural resources and energy supplies.

Except for the 10.4-acre aviation development, the acquisition of the 386 acres and its continued use for agricultural purposes would not change consumption or availability of energy and natural resources. The Proposed Action includes the construction and operation of the 10.4 acres of aviation development, which would result in a small temporary increase in consumption of energy and natural resources during construction and a small permanent increase in consumption of energy and natural resources during operation and maintenance of the new facilities. Construction materials are readily available in the region. Energy and building materials are readily available in the region. As the Proposed Action does not cause demand to exceed available or future supplies of natural resources and energy supplies, the Proposed Action would have **no significant effect** on natural resources and energy supplies.

4.11 Noise and Noise-Compatible Land Use

Aircraft noise is sound from aircraft operations (during engine run-up, departure, overflight, arrival, and taxiing). When unwanted, this sound can disturb or interrupt nearby activities. The FAA uses the DNL as its primary noise metric to measure the impact of aircraft noise and determine compatibility of adjacent land use. DNL accounts for the annual average of the level and frequency of aircraft events and the timeframe in which that occurs (day or night). The FAA has developed a prediction model, the Airport Environmental Design Tool (AEDT), which uses inputs such as runway use, aircraft operations, and flight track geometry to produce noise contour maps. Noise levels that exceed specified DNL levels are considered a potential impact. Land uses considered incompatible at levels at or above 65 DNL include residential uses, schools, and places of worship.

4.11.1 Affected Environment

A noise analysis was prepared for the 2018 MPU and is presented in this environmental evaluation to disclose noise levels associated with aircraft operations at the Airport. Aviation forecasts from the 2018 MPU were used as input into the AEDT model and are shown in **Table 4.3**. The aircraft operations forecasts included in the 2018 MPU have a higher total projected annual aircraft operation level than what is currently published in the current FAA Terminal Area Forecast (TAF) for the Airport. As such, the noise contours prepared for the 2018 MPU, and as included in this assessment, are considered conservative with noise levels from the 2018 MPU expected to be higher than noise levels for the same year with lower total forecast operations.

Table 4.3 Aviation Forecasts

Year	Total Projected Annual Operations, 2018 Airport Master Plan	FAA Terminal Area Forecast (TAF), FY 2013	FAA Terminal Area Forecast (TAF), FY 2022
2014	28,480	29,738	22,737
2024	32,918	33,565	26,003
2034	37,612	37,995	27,231

According to the noise analysis prepared under the 2018 MPU, the 65 DNL noise contour extends beyond the existing Airport property and includes a small portion of pasture/agricultural land and a small segment of Highway 75 (**Figure 4.8**). These are compatible land uses within the 65 DNL noise contour. While DNL represents average sound levels, approaching or departing aircraft can exceed the 65 decibels (dB) outside the Airport property, which include the farmstead, irrigated pasture within the RPZ area, and residential uses further to the south.

The Airport currently maintains a voluntary noise abatement program to promote "Good Neighbor Flying." The goals of the Noise Abatement Program are to have Airport operations that are compatible with the surrounding communities; to educate, involve, and engage the community and flying public about addressing noise issues; to commit to being a good neighbor; to respond to each concern and take action as appropriate; and to strive for continued and increased success of the program.

The Project Area includes historic resources subject to protection under Section 106 of the National Historic Preservation Act (NHPA) as well as Section 4(f). Historic resources in the project area include the Halfway Ranch/Eccles Flying Hat Ranch Historic District (District), which contains contributing and individually eligible resources of the farmhouse, barn (individually eligible), equipment shed, grain bin, utility building, well, Cove Canal (individually eligible), and the Rockwell-White Power Plant Canal (individually eligible). All contributing and individually NRHP-eligible historic resources are located outside of the existing and future 65 DNL noise contour.

4.11.2 Environmental Consequences

While noise levels associated with airport operations are expected to increase in the future due to projected increases in air traffic, the Proposed Action would not increase or decrease the number of aircraft operations, change types of aircraft operating at the Airport, change flight paths, expand the existing noise contours beyond the No Action Alternative, or introduce new incompatible land uses within the 65 DNL contour. The Proposed Action would not change existing agricultural land use of the property proposed for acquisition, except for the 10.4-acre aviation development area, which would be developed compatible with airport operations. The acquisition of 386 acres of the District would protect approach and departure surfaces for the Airport currently zoned for agriculture/residential development from noise-incompatible development and use (see **Section 4.9** for discussion of zoning).

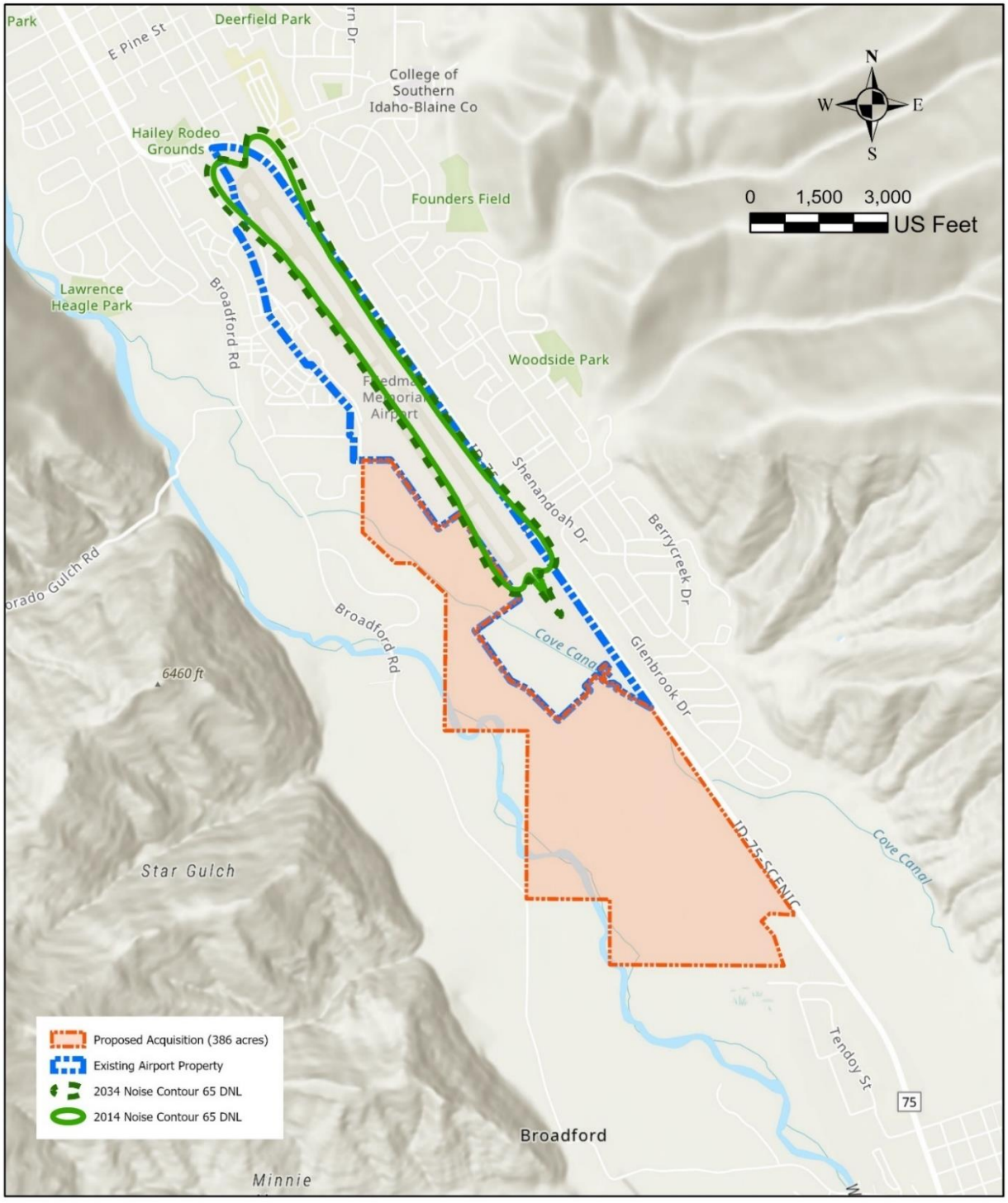

Figure 4.8 65 DNL Noise Contours

Temporary increases in noise would occur from construction of the apron and hangars on the 10.4-acre aviation development area. Construction equipment can produce noise levels anywhere from 70 to 101 dB at 50 feet from the noise source.[21] Prolonged or repeated exposure to sounds louder than 85 dB can damage hearing and accelerate hearing loss, while sounds softer than 75 dB are unlikely to damage hearing.[22] However, proximity to construction equipment has a substantial influence on the noise level. Construction activities would occur adjacent to existing Airport facilities and the runway and would not subject noise sensitive land use to significant noise levels. The nearest noise sensitive land uses to the 10.4-acre aviation development area are 0.2 miles away on the opposite side of Highway 75. While the Proposed Action would cause an increase in noise levels during construction, the duration would be temporary. Construction-related noise cannot be avoided but impacts can be minimized through BMPs outlined below.

Following the proposed acquisition of 386 acres of the Halfway Ranch/Eccles Flying Hat Ranch Historic District (District), the historic contributing and NRHP-eligible features to include the farmhouse, barn, equipment shed, grain bin, utility building, well, Cove Canal, and the Rockwell-White Power Plant Canal would be maintained in their current function for agricultural and/or irrigation-related purposes. The Proposed Action would not result in a change in aircraft operational noise levels that would affect the character or use of the property.

New hangars and an aircraft parking apron would be constructed as part of the 10.4-acre aviation development area. Although this development would result in temporary construction noise, the 10.4 acres are located at the periphery of the District, and is already adjacent to existing features of the Airport. Construction noise associated with development, including hangars and apron on the 10.4-acre parcel, would not impact the District in a manner that diminishes the significant associative values or the historic agricultural character of the District and its contributing features that qualify the resource as eligible under the NHPA.

4.11.3 Mitigation

While specific mitigation linked to noise is not required, the following BMPs will be implemented during construction activities associated with the 10.4-acre aviation development area to minimize or reduce noise levels:

- Proper maintenance of equipment to reduce noise caused from faulty or damaged mufflers and loose engine parts such as screws, bolts, or metal plates
- Use of proper mufflers and sound-absorbing materials for construction equipment
- Equipment operation training and proper hearing protection for construction workers.

[21]FHWA 2021, Construction Noise Handbook, 9.0 Construction Equipment Noise Levels and Ranges, **9.0 Construction Equipment Noise Levels and Ranges - Handbook - Construction Noise - Noise - Environment - FHWA (dot.gov)**.
[22] US. Forest Service. 2010. Preventing noise-induced hearing loss: safety measures for field employees. https://www.fs.fed.us/t-d/pubs/pdfpubs/pdf10672321/pdf10672321dpi72.pdf.

4.11.4 Significance Threshold and Conclusions

According to FAA Order 1050.1F, the threshold for determining if an action would have a significant impact on noise is if any of the following would occur:

- The action would increase noise in a noise sensitive area by DNL 1.5 dB or more when that area is already exposed to noise at or above the DNL 65 dB noise exposure level.
- The action would increase noise in a noise sensitive area by DNL 1.5 dB or more and cause the noise exposure level to meet or exceed the DNL 65 dB level when compared to the no action alternative for the same timeframe.

FAA Order 1050.1F also states that special consideration needs to be given to the impact on noise sensitive areas within Section 4(f) properties.

The No Action Alternative would have **no effect** on noise levels or noise-compatible land use. Current noise and land uses would remain as they presently exist.

The Proposed Action would not result in changes to the number or type of aircraft operating at the Airport or create an increase in aircraft operations or flight patterns. Land acquisition under the Proposed Action would maintain compatible land uses into the future. Temporary increases in noise are expected during construction but would be short-term and within the immediate construction area. The Proposed Action would have **no significant effect** on the DNL 65 noise contour or introduce noise sensitive areas within the contour and would maintain noise-compatible land uses in proximity to the Airport.

Construction associated with the 10.4-acre aviation development area would result in temporary construction noise within the District. The aviation development area is located at the periphery of the District. Construction noise associated with development, including hangars and apron on the 10.4-acre parcel, would not impact the District in a manner that diminishes the significant associative values or the historic agricultural character of the District and its contributing features that qualify the resource as eligible to the NRHP and would have **no significant effect** on the District due to noise impacts.

4.12 Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

Airport projects can impact the socioeconomic conditions of the surrounding community, (e.g., impacting neighboring populations through housing displacements, changes in employment, and other changes to the neighborhood and its air, food, drinking water, recreational waters, soil, or other mediums). These impacts can affect children and/or disproportionately impact specific populations relative to the overall area population. DOT Order 5610.2(a) defines minorities as Black, Hispanic, Asian-American, Native American and Alaskan Native, and Native Hawaiian and Other Pacific Islander individuals. The order also identifies a low-income individual as a person having a median household income at or below the poverty threshold established by the Department of Health and Human Services. U.S. Census data was used to establish a demographic and socioeconomic baseline to assess socioeconomic and environmental justice issues as well as health and safety risks to children.

4.12.1 Affected Environment

Population and Race

According to the 2020 Census, the U.S. Census Bureau estimates that the population of Blaine County was 24,272.[23] According to the Census, Blaine County is predominately white (77 percent), with some Hispanic (21 percent), Asian (0.9 percent), American Indian and Alaska Native (0.6 percent), Black or African American (0.2 percent), and Hawaiian (0.1 percent) ethnicities.

Employment and Income

According to the U.S. Census Bureau 2020 Census, primary employment occupations in Blaine County include management, business, science and arts, service, sales and office, construction and maintenance, and production and transportation. The median household income is $56,694 per year. An estimated 12.5 percent of Blaine County's population was living below the poverty line. The Census Block that includes the Airport and the project area is estimated to include a population where 48 percent of people live below the 50 percent income level for the County.

Blaine County provides low-income housing through the Blaine County Housing Authority (BCHA) located in Ketchum, Idaho. BCHA is not a governmental entity but was authorized by Blaine County as a housing authority pursuant to Title 31, Chapter 42 and Title 50, Chapter 19 of Idaho Code. Two low income BCHA housing apartments, Balmoral Apartments and Snow Mountain Apartments, are located across Highway 75 about 0.15 miles east of the Airport. There are no other indicators of concentrations of low income or poverty populations, or concentrations of high minority, non-English speaking, or foreign-born populations within the immediate vicinity of the Airport.

Children's Environment

According to the U.S. Census Bureau 2020 Census, 4,963 children 17 years of age or younger live in Blaine County and represent 22 percent of the population. Children under five are considered the most vulnerable to environmental hazards and make up about 5 percent of the population. Hailey Elementary School, Wood River Christian School, and Little River Preschool are located about 0.3 mile north of the Airport and within the Primary Safety Zone of the runway (**Figure 4.6**). The Sage School is in close proximity to the Airport, less than 0.1 mile to the west, but outside of Primary and Secondary Safety Zones and outside the 65 DNL noise contour (**Figure 4.7**). Other elementary schools and preschools within the vicinity of the Airport include Alturas Elementary, Syringa Mountain School, Sweet Clover School, Head Start Preschool, and All About Kids Preschool. No public facilities, including schools, parks, or similar resources used by adults or children are located within the 386 acres proposed for acquisition, including the 10.4-acre aviation development area.

4.12.2 Environmental Consequences

The Proposed Action, including acquisition of 386 acres and the development of 10.4 acres for aviation purposes, is not likely to cause or create an increase in aircraft operations at the Airport beyond those that would occur under the No Action Alternative. The Proposed Action would also have no significant effect on noise, vibrations, or fuel consumption, which are of socioeconomic and environmental concern. The 386 acres proposed for acquisition by the Airport would remain in agricultural use as it is today, except for the 10.4-acre aviation development area, which would be converted from agricultural pasturelands to aviation apron and hangars.

[23] 2020 United States Census Bureau, Blaine County, Idaho. https://data.census.gov/cedsci/all?q=Blaine%20County,%20Idaho.

The Proposed Action would not result in changes to access or uses within the project area. The Proposed Action construction and development activities are limited to the 10.4 acres immediately adjacent to existing Airport facilities and would have no adverse effect on economic activity, employment, income, housing, public services, social conditions, or low income or minority populations in the vicinity of the Airport. The construction of the 10.4-acre aviation development area could result in short-term employment opportunities for construction workers. The development of aviation facilities on the 10.4-acre area is not anticipated to result in substantial long-term employment opportunities.

The Proposed Action is also expected to have no significant adverse impacts on the physical or natural environment, including air quality, climate, hazardous materials, noise, and water resources that could lead to significant individual or cumulative human health or environmental effects to low income and minority populations. Likewise, the Proposed Action would have no effect on children's environmental health and safety as the proposed activities are limited to land acquisition and aviation development adjacent to existing facilities at the southern end of the Airport on what is now property of the Halfway Ranch/Eccles Flying Hat Ranch.

4.12.3 Mitigation

Neither the No Action Alternative nor the Proposed Action are anticipated to significantly influence socioeconomics, environmental justice, or children's environmental health and safety. Therefore, mitigation is not required.

4.12.4 Significance Threshold and Conclusions

The FAA does not provide a significance threshold for socioeconomics, environmental justice, or children's environmental health and safety risks. However, it does provide a number of factors to consider in evaluating the context and intensity of potential environmental impacts. These include when the action would have the potential to:

- Induce substantial economic growth in an area.
- Disrupt or divide the physical arrangement of an established community.
- Cause extensive relocation when sufficient replacement housing is unavailable.
- Cause extensive relocation of community businesses that would cause severe economic hardship for affected communities.
- Disrupt local traffic patterns and substantially reduce the levels of service of roads serving an airport and its surrounding communities.
- Produce a substantial change in the community tax base.
- Result in significant impacts in other environmental impact categories and disproportionately affect an environmental justice population.
- Affect an environmental justice population in a way that the FAA determines to be unique or significant to that population.
- Lead to disproportionate health or safety risks to children.

The No Action Alternative would have **no effect** on socioeconomics, environmental justice, or children's environmental health and safety, as it is the non-development alternative.

The Proposed Action is not likely to cause or create an increase in aircraft operations beyond those expected under the No Action Alternative. Land use would remain the same following acquisition, except the 10.4 acres developed for aviation uses, and project activities would not have significant effects on air quality, climate, hazardous

materials, noise, and water resources. The Proposed Action would have **no effect** on economic activity, employment, income, housing, public services, social conditions, or low income or minority populations in the vicinity of the Airport. Likewise, the Proposed Action would have **no significant effect** on the environmental health of low income and minority populations or children's environmental health and safety.

4.13 Visual Effects

The assessment of visual effects considers how the Proposed Action could produce light emissions that create annoyance or interfere with activities, or contrast with or detract from, the visual resources and/or the visual character of the existing environment. Visual effects are outcomes of a project that alter or detract from the existing visual character of the surrounding environment. Visual effects analysis is typically broken into two categories: 1) light emission effects and 2) visual resources and visual character.

4.13.1 Affected Environment

Light Emissions

The Airport operates lighting associated with the airfield, aprons, navigational aids (including approach indicator system and obstruction beacons), the passenger terminal, general aviation activities, FBO facility, parking, and roadways. The runway is equipped with High Intensity Runway Lights and a four-light Precision Approach Path Indicator. Lighting required for the safe operation of the Airport is excluded from the City of Hailey's ordinance that addresses light pollution.

Visual Resources and Visual Character

The Airport is in a shallow valley surrounded by mountains on either side. Highway 75 runs along the eastern side of the Airport, with land on the other side of the Highway consisting of an open space greenbelt and residential and business development. Land to the south and southwest is mostly agricultural and open space with some residential neighborhoods. Land to the west and north of the Airport is industrial and business. The Big Wood River flows south along the edge of the valley to the west of the Airport. The terrain of the valley is mostly flat with little topographical relief.

The Halfway Ranch/Eccles Flying Hat Ranch Historic District (District), as described in **Section 4.8**, is located south of the Airport and within the Proposed Action's project area. The District is eligible for listing on the NRHP for character-defining historic elements and the distinctive characteristics of the settlement period methods of construction during the early 20th century. Important visual components to the Halfway Ranch/Eccles Flying Hat Ranch include the open pastureland, tree lines, and a nucleus of farmstead buildings.

4.13.2 Environmental Consequences

Light Emissions

The Proposed Action would include the installation of new lighting fixtures within the 10.4-acre aviation development area. Lighting could include fixtures to illuminate automobile parking and the aircraft apron area. Light fixtures would be focused on the ground with only sufficient intensity to cover the desired areas. These fixtures are unlikely to create light emissions that would impact sensitive land uses or wildlife because the lighting would not be of an intensity or frequency greater than the existing airport and surrounding industrial facilities.

The remainder of the 386-acre parcel proposed for acquisition would remain unchanged with no alteration of lighting.

Visual Resources and Visual Character

The Proposed Action would not change the visual character of the project area and the surroundings, except for the 10.4-acre aviation development area, which would change pasturelands adjacent to existing airport facilities to apron, hangars, and vehicle access and parking. Although the Proposed Action would result in a new visual element from the 10.4-acre aviation development area within the District, the runway and concentrations of existing hangars and apron parking areas are currently adjacent to the 10.4 acres, already visible from the core of contributing resources of the District, and are located at the periphery of the District. Construction of new aviation development, including hangars and apron on the 10.4-acre parcel, would not alter existing viewsheds from or toward the core of the contributing resources of the District in a manner that diminishes the significant associative values or the historic agricultural character of the District. The remainder of the 386-acre parcel proposed for acquisition would remain unchanged with no alteration of visual resources and character.

The primary visual resources of interest are associated with the District, which contains contributing and individually eligible resources of the farmhouse, barn (individually eligible), equipment shed, grain bin, utility building, well, Cove Canal (individually eligible), and the Rockwell-White Power Plant Canal (individually eligible). With the Proposed Action, the contributing and individually eligible resources within the District would not be altered or removed. The visual character of these resources would remain intact.

4.13.3 Mitigation

The Proposed Action is not anticipated to result in significant impacts to lighting or visual resources. Therefore, mitigation is not anticipated to be necessary.

4.13.4 Significance Threshold and Conclusions

FAA Order 1050.1F does not provide a significance threshold for visual effects. However, it does provide a number of factors to consider in evaluating the context and intensity of potential environmental impacts. For light emissions, these factors include the degree to which the action would have the potential to:

- Create annoyance or interfere with normal activities from light emissions.
- Affect the visual character of the area due to the light emissions including the importance, uniqueness, and aesthetic value of the affected visual resources.
- Block or obstruct the views of visual resources.

The No Action Alternative would have no effect on light emissions, visual resources, or visual character.

The Proposed Action would not result in changes to light emissions or visual resources, except for the 10.4-acre aviation development area. Construction of new aviation development, including hangars and an apron on the 10.4-acre parcel, would include lighting consistent with existing adjacent Airport facilities and would not alter existing viewsheds from or toward the core of the contributing resources of the District in a manner that diminishes the significant associative visual value or the historic agricultural character of the District. The Proposed Action would have **no significant effect** on light emissions, visual resources, or visual character.

4.14 Water Resources

Due to the interrelationship between surface water, groundwater, floodplains, and wetlands, the analysis of these resource categories is conducted under the all-encompassing impact category of "water resources." Impacts to any part of the system can have negative consequences to the functioning of the entire system. Wild and scenic rivers are included in this category because impacts to Wild and Scenic Rivers closely resemble impacts to water resources, such as altering free-flowing characteristics and impacts to water quality. The areas of consideration for water resources include those elements physically located within the project boundary as well as those upstream and downstream of the property.

4.14.1 Affected Environment

Wetlands

Jurisdictional wetlands are protected under Section 404 of the Clean Water Act (CWA), which regulates the discharge of dredge or fill material into Waters of the United States, including wetlands. Section 401 of the CWA requires water quality certification to ensure that a project does not violate state or tribal water quality regulations. Under the CWA, wetlands are defined as areas that, under normal circumstances, support a prevalence of vegetation typically adapted for life in saturated soil conditions. The U.S. Army Corps of Engineers (USACE) delineation manual requires that positive indicators of a wetland be present for the following three parameters to meet the definition of a wetland: (1) hydrophytic vegetation, (2) hydric soil, and (3) hydrology.

Executive Order (EO) 11990, Protection of Wetlands, requires federal agencies to "avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative."

A wetlands investigation was conducted for the project and consisted of a desktop evaluation using National Wetland Inventory (NWI) wetland maps. The NWI identifies multiple wetlands within the 386-acre proposed property acquisition area. Many of the noted wetlands are associated with the Big Wood River and its floodplains. Wetlands identified by NWI include freshwater emergent wetlands, freshwater forested/shrub wetlands, freshwater ponds, and riverine wetlands within the subject property.

In addition to review of NWI wetland maps, a field survey was conducted for the 10.4-acre aviation development area to investigate if wetlands are present within the area of proposed development. The NWI database identified a 0.66-acre freshwater forested/shrub wetland, classified as a PSSC within the 10.4-acre aviation development area. During the field survey, the NWI identified wetland was determined to be an agricultural wheel line without wetland features. It appears that the NWI photo interpretation methodology using color infrared imagery from 1984 has misidentified this feature. **Appendix B** includes the findings of the wetlands investigation and field survey.

Floodplains

A floodplain is a flat, low area adjacent to a stream, river, or creek that may flood during high water conditions. Floodplains provide natural flood and erosion control, habitats, and other functions and benefits. A 100-year floodplain is the area that has a 1 percent chance of flooding in a given year. Development in floodplains is regulated by Executive and Department of Transportation Orders.

Floodplain maps (Flood Insurance Rate Map or FIRM) are published by the FEMA. According to the FIRMs for the area proposed for acquisition, the floodplain associated with the Big Wood River is a regulated floodplain and is located within the project area (**Figure 4.9**).

The 10.4-acre aviation development area is not within a regulated floodplain and is approximately 0.25 mile from the floodplain associated with the Big Wood River.

Surface Waters

Surface waters such as lakes, rivers, creeks, and other features provide important benefits to the biotic and human communities in which they are located. The National Pollutant Discharge Elimination System (NPDES) establishes a process to identify impaired waters, establish maximum pollutant levels, and permit construction projects with the potential to discharge via a point source.

Surface waters in the 386-acre project area include stretches of the Big Wood River, Cove Canal, and Rockwell-White Power Plant Canal. There are no surface waters present on or adjacent to the 10.4-acre aviation development area. The closest surface water to the 10.4-acre aviation development area is the Cove Canal, which is approximately 300 feet from the area of proposed disturbance.

The Airport has in place a Storm Water Pollution Plan (SWPPP), which was prepared for the Airport in 2008 to comply with the requirements of the NPDES, CWA, and the Multi-Sector General Permit (MSGP)-2000 for industrial activity. The SWPPP includes a site assessment for runoff and erosion, detailed existing potential sources of pollutants, and recommended facilities, monitoring practices, and procedures to reduce the contribution of pollutants from the Airport to surface waters, as well as treatment measures to be employed when pollutants encounter surface runoff.

Aircraft fueling and de-icing services are performed on the apron by Atlantic Aviation-Sun Valley and by the commercial air carriers utilizing mobile equipment. Airport pavement surfaces are also de-iced by the Airport. De-icing of aircraft takes place during the winter months, typically between November and March. Areas likely to be contaminated with de-icing fluid include the pavement of the runway and primary taxiway and the aircraft parking aprons adjacent to the FBO and terminal buildings where aircraft are typically de-iced. The majority of de-icing fluids evaporate rather than run off. Excess run-off is typically captured in drywells with little or no stormwater contamination.

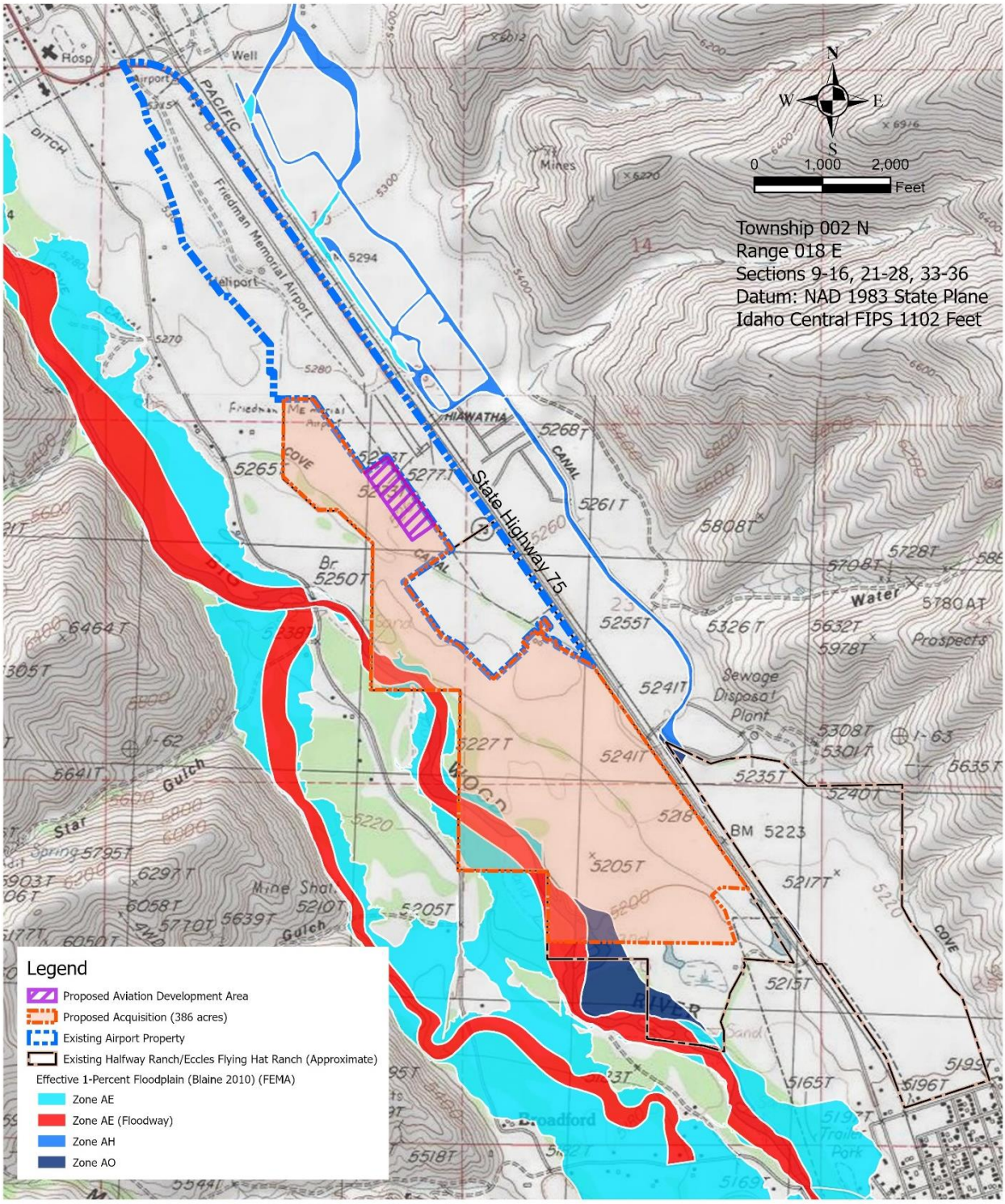

Figure 4.9 Floodplains in the Proposed Acquistion Area and Vicinity

Groundwater

Groundwater is water under the surface of the earth, including in the pore space between soil units and in aquifers, wells, springs, and other sources. Sole source drinking water aquifers and their discharge areas are protected under the Safe Drinking Water Act.

The Project Area is within the Eastern Snake River Plain Aquifer Source Area and is above the Big Wood River Valley Aquifer that is approximately 106 square miles and comprised of a single unconfined aquifer that underlies two distinct areas: 1) the upper valley from Galena Summit (about 20 miles north of Ketchum) south to Bellevue and 2) the lower valley south of Bellevue that opens into a triangular alluvial fan, known as the Bellevue fan, about 9 miles wide at its southern end.[24] The project area is in the upper valley, which is narrow and broadens downstream to a maximum of 2 miles in width and has a depth-to-groundwater ranging from 10 to 90 feet. Simulated flows found that, in general, groundwater moves down valley into the Bellevue fan, at which point the flow splits eastwards and westwards. The model indicates that, while the Big Wood River is well connected to the unconfined aquifer from Hailey to Glendale, the depth-to groundwater is high.

Recharge or inflow of water to the Big Wood River Valley aquifer system originates from seven main sources: infiltration from tributary canyons, streamflow loss from the Big Wood River, deep percolation of precipitation and excess irrigation water, seepage from canals and recharge pits, subsurface inflow beneath the Big Wood River in the northern end of the valley, leakage from municipal pipes, and percolation from septic systems. Because the sediments of the valley floor are highly permeable and the flow of some tributaries, such as Indian Creek, has been modified or diverted by development, only the largest tributaries are perennial and contribute flow directly to the Big Wood River throughout the year.[25]

Groundwater wells used for irrigation are present within the 386-acre acquisition area. There are no wells within the 10.4-acre aviation development area. The nearest groundwater well is located approximately 1,300 feet southeast of the 10.4-acre development area. Another irrigation well is located approximately 1,500 feet northeast of the 10.4-acre development area. Additionally, there are groundwater wells associated with domestic, single-residence use outside the acquisition area, with the nearest being approximately 1,700 feet west of the 10.4-acre development area.

Stormwater drywells (classified as shallow injection wells) are located within existing airport property adjacent to the 10.4-acre development area.

Wild and Scenic Rivers

Wild and Scenic Rivers are free-flowing rivers designated for protection and preservation by the Wild and Scenic Rivers Act due to their scenic, recreational, geologic, fishing, wildlife, historic, cultural, and other values. The Act requires analysis of actions, such as construction or development that may impact the form or function of a Wild and Scenic River.

[24] Fisher, J.C., Bartolino, J.R., Wylie, A.H., Sukow, Jennifer, and McVay, Michael. 2016. Groundwater-flow model of the Wood River Valley aquifer system, south-central Idaho: U.S. Geological Survey Scientific Investigations Report 2016–5080. Accessed April 30, 2018 at http://dx.doi.org/10.3133/sir20165080

[25] James R. Bartolino. 2009. Ground-Water Budgets for the Wood River Valley Aquifer System, South-Central Idaho, 1995–2004. Scientific Investigations Report 2009-5019.

The Middle Fork of the Salmon River is the closest Wild and Scenic River to the Airport; it is located approximately 75 miles north of the project area.

4.14.2 Environmental Consequences

Wetlands

The Proposed Action would not result in impacts to wetlands and other jurisdictional waters because no wetlands are present in the 10.4-acre aviation development area. All proposed construction and land disturbances would be in an area that is actively used and maintained as pasturelands. No state or federal wetland permits would be required. No construction or other disturbances to wetlands would occur as a result of the Proposed Action on the remaining portions of the 386 acres proposed for acquisition.

Floodplains

While the 386-acre property proposed for acquisition contains a regulated floodplain associated with the Big Wood River, the Proposed Action would not include (and the Airport does not plan) development within floodplain areas.

The 10.4-acre aviation development area is not within a regulated floodplain and is approximately 0.25 mile from the nearest FEMA mapped floodplain, which is associated with the Big Wood River. Therefore, the Proposed Action would have no effects on floodplains.

Surface Waters

Construction of the proposed aviation development would create additional impervious surface area. The biological evaluation included in **Appendix B** concluded the additional 10.4 acres of impervious surface area created from the aviation development would result in no disturbance to streams and riparian zones. Vegetation disturbances would be limited to the 10.4-acre aviation development area and would occur in areas currently maintained as pasture areas. The Proposed Action would not remove any trees or shrubs in any streams.

Based upon the location of the 10.4-acre aviation development area and lack of defined drainages through the area, there is no direct connectivity to receiving waters, and no sedimentation or contamination from construction runoff would enter fish-bearing surface waters. The creation of additional impervious surface would have minimal to no impact on the biological function of nearby waters, including the Big Wood River.

The 10.4-acre aviation development area associated with the Proposed Action would be subject to the Airport SWPPP to comply with the requirements of the NPDES, CWA, and the MSGP-2000 for industrial activity. The SWPPP would be reviewed in consideration of the Proposed Action, with updates provided as warranted. The provision of the SWPPP would provide requirements for runoff and erosion, monitoring practices, and procedures to reduce the contribution of pollutants from the Airport to surface waters, as well as treatment measures to be employed when pollutants encounter surface runoff.

Aircraft fueling and de-icing services may be performed on the apron portions of the 10.4-acre aviation development area. Most de-icing fluids would evaporate rather than run off. The majority of stormwater run-off would be captured in drywells with little or no stormwater contamination. Fugitive stormwater runoff would sheet flow onto surrounding turf areas and infiltrate into the soils.

The Airport's existing stormwater system has capacity to handle additional stormwater volume from the area proposed for acquisition. To minimize impacts of stormwater run-off, proper practices would be utilized, including regular inspection and maintenance of stormwater features and proper handling and management of chemicals and other materials.

Groundwater

It is anticipated that the proposed aviation area would be connected to existing Airport utilities, including potable water supplies. Therefore, no additional wells would be constructed. The additional water demand associated with the 10.4-acre aviation development area is anticipated to be negligible because of the limited water consumption typical of aircraft hangar developments.

Groundwater modeling shows that, while the Big Wood River is connected to the underlying unconfined aquifer, the specific reach in the proximity of the project area is a losing reach, indicating that depth-to-groundwater is higher at this location. The Proposed Action does not involve any groundwater withdrawals or construction activities associated with new or existing wells. Overall, the Proposed Action, including construction and operations of the 10.4-acre aviation development area, is unlikely to affect groundwater. Construction impacts to groundwater are unlikely due to the high depth-to-groundwater within the project area and the implementation of BMPs to prevent potential releases of petroleum materials, including proper use, storage, inspection, and maintenance of equipment.

Groundwater recharge would not be significantly impacted as a result of the Proposed Action. The 10.4-acre aviation development area would no longer be irrigated, thereby reducing the groundwater outflow for irrigation. Conversely, the increase in impervious surfaces would redirect rainwater from previous pervious surfaces to drainage areas, including drywells. Given the porous nature of the soils surrounding the Airport in the Wood River Valley, the majority of stormwater is anticipated to continue into groundwater.

A U.S. EPA Sole Source Aquifer Program – Project Review Checklist was prepared for the Proposed Action and submitted to the Environmental Protection Agency (EPA) on February 14, 2022. The EPA responded on February 15, 2022 with a finding that the Proposed Action would not have a significant adverse impact on the Eastern Snake River Aquifer Area Sole Source Aquifer. Copies of the correspondence and U.S. EPA Sole Source Aquifer Program – Project Review Checklist are included in **Appendix G**.

BMPs would be utilized to prevent the release of fuel, including during use, refilling, and maintenance of fueling equipment.

Wild and Scenic Rivers

Because of the distance from the Proposed Action location to the Middle Fork of the Salmon River (approximately 75 miles) impacts are not anticipated from the Proposed Action.

4.14.3 Mitigation

While no specific mitigation is required, the following BMPs will be employed to prevent and minimize impacts to water resources:

- Designate areas for storage, maintenance, and refueling of construction equipment away from water resources.
- Designate area for storage of materials.
- Inspect vehicles and equipment for leaks and foreign matter, repair or clean (off site) to prevent release of materials into water bodies and clean up all spills immediately.
- Collect construction and demolition debris and sediment for offsite disposal; if aggregate or soil will be used on-site, stockpile up gradient from water resources and use erosion controls after placement.
- Collect waste motor oil, coolant, other fluids, and batteries for offsite disposal.
- Monitor water resources for signs of releases and take corrective action following any events.

4.14.4 Significance Threshold and Conclusions

For all water resources, the No Action Alternative would result in **no impact** to water resources because there would be no changes to operations or disturbance of lands.

Wetlands

Exhibit 4-1 of FAA Order 1050.1F provides the FAA's significance threshold for wetlands. A significant impact would occur when the action would:

1. Adversely affect a wetland's function to protect the quality or quantity of municipal water supplies, including surface waters and sole source and other aquifers;
2. Substantially alter the hydrology needed to sustain the affected wetland system's values and functions or those of a wetland to which it is connected;
3. Substantially reduce the affected wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety or welfare (the term welfare includes cultural, recreational, and scientific resources or property important to the public);
4. Adversely affect the maintenance of natural systems supporting wildlife and fish habitat or economically important timber, food, or fiber resources of the affected or surrounding wetlands;
5. Promote development of secondary activities or services that would cause the circumstances listed above to occur; or
6. Be inconsistent with applicable state wetland strategies.

The Proposed Action would result in **no impact** to wetlands and other jurisdictional waters because no wetlands are present at the 10.4-acre aviation development area, and the remaining property to be acquired will remain in agricultural use.

Floodplains

Floodplain impacts would be significant if: The action would cause notable adverse impacts on natural and beneficial floodplain values. Natural and beneficial floodplain values are defined in Paragraph 4.k of DOT Order 5650.2, *Floodplain Management and Protection*.

The Proposed Action would result in **no impact** to floodplains because no floodplains are present within the 10.4-acre aviation development area, and the remaining property to be acquired will remain in agricultural use.

Surface Waters

Exhibit 4-1 of FAA Order 1050.1F provides the FAA's significance threshold for surface waters. A significant impact exists if the action would:

1. Exceed water quality standards established by Federal, state, local, and tribal regulatory agencies; or
2. Contaminate public drinking water supply such that public health may be adversely affected.

In addition to the threshold above, Exhibit 4-1 of FAA Order 1050.1F provides additional factors to consider when evaluating the context and intensity of potential environmental impacts for surface waters. Factors to consider that may be applicable to surface waters include, but are not limited to, situations in which the proposed action or alternative(s) would have the potential to:

- Adversely affect natural and beneficial water resource values to a degree that substantially diminishes or destroys such values;
- Adversely affect surface waters such that the beneficial uses and values of such waters are appreciably diminished or can no longer be maintained and such impairment cannot be avoided or satisfactorily mitigated; or
- Present difficulties based on water quality impacts when obtaining a permit or authorization.

The Proposed Action would result in **no significant impact** to surface waters because no surface waters are present at the 10.4-acre aviation development area, and stormwater runoff during construction and operation of the aviation development area would be managed in accordance with the existing Airport programs. The remaining property to be acquired will remain in agricultural use.

Groundwater

Exhibit 4-1 of FAA Order 1050.1F provides the FAA's significance threshold for groundwater. A significant impact exists if the action would:

1. Exceed groundwater quality standards established by Federal, state, local, and tribal regulatory agencies; or
2. Contaminate an aquifer used for public water supply such that public health may be adversely affected.

In addition to the threshold above, Exhibit 4-1 of FAA Order 1050.1F provides additional factors to consider when evaluating the context and intensity of potential environmental impacts for groundwater. Factors to consider that may be applicable to groundwater include, but are not limited to, situations in which the proposed action or alternative(s) would have the potential to:

- Adversely affect natural and beneficial groundwater values to a degree that substantially diminishes or destroys such values;
- Adversely affect groundwater quantities such that the beneficial uses and values of such groundwater are appreciably diminished or can no longer be maintained and such impairment cannot be avoided or satisfactorily mitigated; or
- Present difficulties based on water quality impacts when obtaining a permit or authorization.

The Proposed Action would result in **no significant impact** to groundwater because the Airport would continue to use existing utilities, including water. No additional wells would be constructed. Stormwater from airport facilities would continue to be directed toward drywells, and BMPs would be utilized to prevent the release of fuel, including during use, refilling, and maintenance of fueling equipment. The remaining property to be acquired will remain in agricultural use.

Wild and Scenic Rivers

The FAA has not established a significance threshold for Wild and Scenic Rivers in FAA Order 1050.1F; however, the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts for Wild and Scenic Rivers (see Exhibit 4-1 of FAA Order 1050.1F). Factors to consider that may be applicable to Wild and Scenic Rivers include, but are not limited to, situations in which the proposed action and or alternative(s) would have an adverse impact on the values for which a river was designated (or considered for designation) through:

- Destroying or altering a river's free-flowing nature;
- A direct and adverse effect on the values for which a river was designated (or under study for designation);
- Water Resources 14-32
- 1050.1F Desk Reference July 2015
- Introducing a visual, audible, or other type of intrusion that is out of character with the river or would alter outstanding features of the river's setting;
- Causing the river's water quality to deteriorate;
- Allowing the transfer or sale of property interests without restrictions needed to protect the river or the river corridor (which cannot exceed an average of 320 acres per mile which, if applied uniformly along the entire designated segment, is one-quarter of a mile on each side of the river); or
- Any of the above impacts preventing a river on the Nationwide Rivers Inventory (NRI) or a Section 5(d) river that is not included in the NRI from being included in the Wild and Scenic River System or causing a downgrade in its classification (e.g., from wild to recreational).

Because of the distance from the Proposed Action location to the Middle Fork of the Salmon River (approximately 75 miles), impacts are not anticipated from the Proposed Action.

4.15 Cumulative Impacts

Cumulative impacts result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can be viewed as the total combined impacts on the environment of the Proposed Action or alternative(s) and other known or reasonably foreseeable actions.

To assess cumulative impacts, this section identifies all projects in the recent past, present, and reasonably foreseeable future actions. The recent past includes projects implemented within the past five years. Current projects include those that have been publicly funded, privately permitted, or under construction during development of this EA (2020-2022). Future projects include those for which funding has been earmarked or a needs assessment has identified the project for consideration in the reasonably foreseeable future.

Projects considered for this analysis include: other projects using federal aid money, such as the FAA AIP or other federally funded projects in the general vicinity; Airport capital improvement projects; the Idaho Transportation Department Statewide Transportation Implementation Plan, which identifies future transportation projects; and proposed private developments within the vicinity of the Airport.

Past Projects (occurring within the past five years)

1. Past roadway projects outside of SUN property and in the general vicinity include roadway maintenance and road rehabilitations.
2. Single family and muti-family residential housing units have been constructed in the cities of Bellevue and Hailey.
3. Relocate Hangar Taxi Lanes/Apron Improvements (2013-14) at the Airport. This project overlaid the general aviation apron to strengthen pavement and construct new taxi lanes to access hangars on the west rather than the east.
4. Relocated Taxiway B, Grade RSA, and Remove Taxiway A (South) (2014) at the Airport. This project relocated and extended Taxiway B while removing Taxiway A, graded the RSA, and constructed three new connector taxiways. The total duration of the project was 60 days, but the bulk of the work was completed during a 25-day Airport closure.
5. Terminal Expansion and Remodel (2014-2015) at the Airport. The project moved the terminal aircraft parking to the north side of the terminal to place it outside of the runway object free area. The terminal was not configured to move passengers to the north end of the building, so a 14,000-square-foot addition to the building was constructed and the existing area of the building was remodeled.
6. Airport Operations Building (2014-2015) at the Airport. The Airport's existing administration office and ARFF/SRE building needed to be relocated. This project constructed a new facility to house these functions in one building. The new facility is more efficient and suited to the needs of Airport operations staff, especially for SRE storage and maintenance.
7. Construct Terminal Apron (2014) at the Airport. A new apron for the terminal aircraft parking was constructed on the north side of the terminal. This apron was constructed with Portland cement concrete pavement. Due to the confined site, significant analysis of aircraft movements on the apron was required. T-O Engineers completed the analysis as part of the project design.
8. Relocate Taxiway B, Grade RSA, and Remove Taxiway A (North) (2015) at the Airport. This project relocated the remainder of Taxiway B and removed the remainder of Taxiway A while grading the RSA on the north half of the Airport. The project also reconstructed all of the connecting taxiways in this area and constructed a new apron and hangar access taxi lane at the north end of the airfield. Also included was the demolition of five hangar buildings.

9. Central Bypass Taxiway/Facility Demolition (2015) at the Airport. Due to the constrained site and operational patterns at the Airport, bypass taxiways are necessary to allow aircraft to pass each other head to head on the parallel taxiway. The last project in the program removed the Airport administration and ARFF/SRE buildings and constructed a new bypass taxiway in this location.
10. Property Acquisition for Approach Protection (2018) at the Airport. This project included the acquisition of 64.7 acres from the Halfway Ranch/Eccles Flying Hat Ranch Farmstead Historic District for protection of and obstruction removal within the RPZ at the southern end of Runway 31.
11. Terminal Apron Expansion and Access Road Realignment (2019) at the Airport. This project expands the terminal aircraft parking apron at the Airport to accommodate one additional aircraft on the ground, while also realigning the access road and vehicle parking lots for the Airport.

Current Projects (2020-2022)

12. Construct shared use path for East Croy St. from the Wood River Trail bike path east to Eastridge Dr., then Eastridge Dr. south to Quigley Road (2022).
13. Rehabilitate Aprons, Sections 1, 2 and 4. Mill and overlay, crack seal and seal coat aircraft parking aprons on the Airport (2020).
14. Rehabilitate Runway 13-31. Mill and overlay the Airport's runway (2022).

Future Projects (identified for consideration in the reasonable future by the Airport)

15. Seal coat to SH75 between Bellevue and Hailey (2023).
16. Construct shared use path for East Croy St. from the Wood River Trail bike path east to Eastridge Dr., then Eastridge Dr. south to Quigley Road.
17. Single-family and muti-family residential housing units are planned for construction in the cities of Bellevue and Hailey.
18. Terminal Expansion – Security Checkpoint and Concourse (2023).
19. Construct Replacement Airport Traffic Tower. Construct a new aircraft control tower and remove the existing tower at the Airport (2023).
20. Rehabilitate Taxiway B and Section 3 Apron. Crack seal and seal coat Taxiway B and aircraft parking apron Section 3 (2024).

4.15.1 Cumulative Impact Assessment

The following describes the analysis of potential cumulative impacts for environmental resource categories in which the implementation of the Proposed Action might contribute to cumulative impacts when considered with other past, present, and reasonably foreseeable future actions. The Proposed Action in conjunction with other implemented or proposed projects may together yield significant impacts, even though the direct and indirect impacts from the Proposed Action alone are not significant.

As detailed earlier in this chapter, the following resources are not present in the area proposed for acquisition, will not contribute to cumulative impacts, and will not be addressed further:

- Coastal resources
- Wild and scenic rivers

The following resources are present in the area proposed for acquisition, but when impacts from the project are combined with past, present, and reasonably foreseeable projects, significant impacts are not expected. BMPs as described in the previous sections of this chapter would be implemented to further reduce or eliminate impacts.

Cumulative impacts are not anticipated because none of the past, present, and reasonably foreseeable future projects examined are anticipated to have long-term impacts on these resources, and temporary impacts due to their construction would occur at different timeframes and/or locations different than the Proposed Action.

- Air Quality
- Climate
- Farmlands
- Hazardous Materials, Pollution Prevention, and Solid Waste
- Land Use
- Natural Resources and Energy
- Noise and Compatible Land Use
- Socioeconomic Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects
- Water Resources – Ground Water, Floodplains, Surface Waters, Wetlands, Wild and Scenic Rivers

The remaining resources merit further consideration for cumulative impacts and are discussed below.

Biological Resources

Continued development at the Airport, as well as steady growth within the Wood Valley Region and throughout the State of Idaho, have contributed to increases of impacts to wildlife, fish, and vegetative species as well as continued loss of habitats that support them. The USFWS and National Marine Fisheries Service regulate actions that could jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat. Adverse effects may include long term or permanent loss of unlisted plant and wildlife species; impacts to special status species or their habitats; a substantial loss, reduction degradation, disturbance or fragmentation of native species' habitats or populations; or adverse impacts on species' reproductive success rates, natural mortality rates, non-natural mortality, or ability to sustain the minimum population levels required for maintenance.

General Wildlife and Vegetation

Vegetative and wildlife communities across the project area would remain unchanged, except for the construction and development associated with the 10.4-acre aviation development area. The aviation development area would be converted from managed irrigated pastureland to pavements and aircraft hangars. The 10.4 acres of habitat conversion represent a very small percentage of total habitats present within the area proposed for acquisition, the vicinity of the Airport, and the region. The Proposed Action does not include in-water work and would not occur adjacent to waterways.

Managed pastures would continue to be present adjacent to the Airport and throughout the region to support vegetative and wildlife species. When combined with past, present, and reasonably foreseeable future projects, the Proposed Action **would not cumulatively contribute to a trend towards federal listing or loss of viability** for general wildlife and vegetation species.

Federal Threatened and Endangered Species

The Proposed Action would have no effect on federally listed Canada lynx and North American wolverine, as neither the species nor their habitats are found in the project area. The Proposed Action would also have no effect on the YBCC. The 10.4-acre aviation development area does not contain suitable YBCC habitat.

Because the Proposed Action would have no effect on federally protected species or their habitat, there would be **no cumulative impacts regarding threatened, endangered, or candidate species** when considered with other past, present, and reasonably foreseeable future actions.

State Sensitive Species and Species of Interest

The Proposed Action may impact but would not likely contribute to a trend towards federal listing or loss of viability to red-tailed hawks. There is no proposed removal of trees or reduction of potential nesting and perching habitats suitable for red-tailed hawks. The conversion of the 10.4-acre aviation development site from agricultural land would result in the loss of habitat for small mammals and other red-tailed hawk prey species; however, the loss of habitat is relatively small. The Proposed Action would have no effect on state sensitive olive-sided flycatcher as neither the species nor its habitat is found in the project area. Therefore, there are **no significant cumulative impacts to the red-tailed hawk, olive-sided flycatcher, or their habitats** when considered with other past, present, and reasonably foreseeable future actions.

The Proposed Action may impact but would not likely contribute to a trend towards federal listing or loss of viability of several SGCN Tier 1 bumble bee species (Morrison's, Western, and Suckley's Cuckoo Bumble Bee). The Proposed Action would not impact bumble bee habitats, as field surveys of the 10.4-acre aviation development area did not identify flowering resources within the area. Following development of the 10.4-acre aviation development area, stabilization and restoration of areas will incorporate native flowering plants that are beneficial for pollinators (e.g., bumble bees and butterflies) where able. Therefore, there are **no significant cumulative impacts to Morrison's, Western, and Suckley's Cuckoo Bumble Bee or their habitats** when considered with other past, present, and reasonably foreseeable future actions.

Suitable habitat does exist for the long-billed curlew in the form of irrigation pasture. Under the Proposed Action, 10.4 acres of irrigated pasture would be converted to aircraft apron and hangars. The Proposed Action may impact but would not likely contribute to a trend towards federal listing or loss of viability to long-billed curlews as the reduction in irrigated pastureland would reduce potential nesting. However, the amount of irrigated pastureland is insignificant when compared to available habitat within the project area and adequate replacement habitat is readily available. All projects examined are short-term, limited to the current Airport property, and unlikely to significantly impact long-billed curlew. Therefore, the Proposed Action would result in **no significant cumulative impacts to the long- billed curlew or their habitat** when considered with other past, present, and reasonably foreseeable future actions.

Migratory Birds

Suitable nesting habitat for migratory birds that prefer managed pasturelands is present within the project area. The Proposed Action does not include tree, shrub, or brush removal. The Proposed Action would permanently remove potential nesting and foraging habitat for some bird and wildlife species, but the loss of habitat is small when compared available habitat throughout the Wood River Valley. The Proposed Action would not likely contribute to a trend towards federal listing or loss of viability for migratory bird species. All past, present, and reasonably foreseeable future projects examined are limited to the current Airport property and are unlikely to

significantly impact migratory birds. Therefore, the Proposed Action would result in **no significant cumulative impacts to migratory birds** when considered with other past, present, and reasonably foreseeable future actions.

Department of Transportation Act, Section 4(f)

The Proposed Action does not include the use of any publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance.

The Proposed Action includes acquisition of 386 acres of the Halfway Ranch/Eccles Flying Hat Ranch Historic District (District). Most of the acreage in the District is planned to remain in agricultural use with no direct effects to historic resources that are contributing resources or the landscape or spatial elements that contribute to the historic character of the District.

When combined with the 2018 acquisition of 64.7 acres from the District for protection of and obstruction removal within the RPZ at the southern end of Runway 31, the combined projects have no significant impact on historic properties. SHPO has concurred with the FAA determination of **No Historic Properties Adversely Affected** due to the Proposed Action. After careful and thorough evaluation, the FAA made a ***de minimis*** finding for Section 4(f) historic resources.

No other past, current, or future projects are reasonably foreseeable that would impact directly, indirectly, or cumulatively the District. The Proposed Action would result in **no significant cumulative uses** to DOT Section 4(f) resources.

Historical, Architectural, Archaeological, and Cultural Resources

The Proposed Action would result in the Airport acquiring 386 acres from within the historic boundary of the District (Idaho Historic Site Inventory (IHSI) #13-16207), which was previously determined eligible for listing in the NRHP under Criterion A for its association with agricultural development in the Wood River Valley.

The Proposed Action would develop 10.4 acres—or 2 percent of the acreage within the District—that contains no contributing resources, landscape elements, or individually eligible properties and is located immediately adjacent to similar development along the west side of the existing runway for aviation use. Hangars and an aircraft parking apron would be constructed as part of the 10.4-acre development for aviation use.

When combined with the 2018 acquisition of 64.7 acres from the District for protection of and obstruction removal within the RPZ at the southern end of Runway 31, the combined projects have no significant impact on historic properties. SHPO has concurred with the FAA determination of **No Historic Properties Adversely Affected** due to the Proposed Action.

The Proposed Action would have no adverse effect on the District and its contributing resources and individually eligible properties based on the application of the National Register Criteria of Adverse Effect and a condition that special provisions are written into the lease agreement pertaining to the ongoing maintenance and use of the contributing resources within the District as part of the Proposed Action. SHPO has concurred with the FAA determination that the land acquisition and the 10.4-acre development for aviation use would result in “no adverse effect” to the District, individually eligible historic resources, and contributing resources.

No past, current, or future projects are reasonably foreseeable that would impact directly, indirectly, or cumulatively the District. The Proposed Action would result in **no significant cumulative impacts** to historical, architectural, archaeological, and cultural resources.

4.15.2 Significance Threshold and Conclusions

According to the Desk Reference for FAA Order 1050.1F, the significance of cumulative impacts should be determined in the same manner as the significance of direct and indirect impacts

The No Action Alternative would result in **no effect** on cumulative impacts, as it is a non-development alternative.

Based on the review and findings of known ongoing, planned, and proposed projects in the vicinity of the Airport and the area proposed for acquisition, it is concluded that the Proposed Action when added to past, present, and reasonably foreseeable future projects would result in **no significant cumulative impacts**.

The construction activity of the Proposed Action would encompass a relatively small area (10.4 acres) and is temporary in nature. When considered with other construction projects at the Airport and throughout the region, there are **no significant cumulative construction impacts**.

Future federal projects would be subject to review under NEPA to determine whether significant environmental impacts are likely and to identify mitigation measures for any identified adverse effects. Through the planning processes and associated regulations, the FMAA is able to influence many potential cumulative effects associated with any new growth and development at the Airport.

Chapter 5

Public Involvement and Agency Coordination

This section summarizes efforts to perform outreach to and obtain input from the public and from federal, state, and local agencies about the Proposed Action and related potential effects on the environment. Public and agency outreach is not only required under the NEPA process but is encouraged by the FMAA Board to ensure full disclosure on all information regarding the project. The EA is being made available for review and comment for 30 days. During this time, interested parties and the public can review the EA and provide comments.

5.1 Friedman Memorial Airport Authority Board Updates and Presentations

Meetings of the FMAA Board are open public meetings that occur on the first Tuesday of the month, with public notice provided for each meeting. Since initiation of the EA, project status updates were included in the FMAA Board packages for each meeting. The Airport Director provided an update at each meeting and detailed project presentations were provided at milestones throughout the process. FMAA Board updates included details regarding the proposed action, assessment of environmental effects (specifically potential impacts to historic and archaeological resources), public involvement and agency coordination efforts, and overall environmental assessment process. The PowerPoint presentation slides developed for these updates are included in **Appendix G**.

5.2 Agency and Tribal Coordination

Coordination correspondences were sent to the following agencies and tribes and are included in **Appendix G**:

- Shoshone Bannock Tribes
- Regional History Museum – Community Library
- Blaine County Historical Museum
- Idaho State Historic Preservation Office
- U.S. Department of Agriculture
- Idaho Fish and Game
- U.S. EPA Region 10 – Water Division, Groundwater Protection Program

Agency response letters received are also included **Appendix G**.

5.3 Public Review of the EA

The comment period for the Draft Environmental Assessment was conducted from May 11th, 2022 through June 10th, 2022. A Notice of Availability of the Draft Environmental Assessment for the Proposed Land Acquisition and Aviation Development at Friedman Memorial Airport (SUN) was published in the *Idaho Mountain Express* on May 11th, 13th, 18th and 20th, as well as noticed on the Friedman Memorial Airport website. Copies of the Draft Environmental Assessment were made available online. Hard copies of the Draft Environmental Assessment were also made available for public review at three community locations, including Friedman Memorial Airport, Hailey Public Library, and Blaine County Clerk's Office.

Comments were accepted through the project website, email, and mail delivery. Comments were received from six members of the public, two anonymous commenters, and the Wood River Land Trust. Responses are provided for comments relevant to the Friedman Memorial Airport. The comments received and corresponding responses to the comments can be found in **Appendix H**.

FINAL ENVIRONMENTAL ASSESSMENT

FRIEDMAN MEMORIAL AIRPORT

SUN

Mead & Hunt