

Airport Traffic Control Tower (ATCT) Replacement  
Friedman Memorial Airport (SUN)  
DRAFT Tiered Environmental Assessment (EA)  
Hailey, Idaho  
December 23, 2025



**FAA EA Reference Number:** EAXX-021-12-ARP-1761226912

This Environmental Assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA Official.

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Date

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## Acronyms and Abbreviations

AC .....	Advisory Circular	NEPA .....	National Environmental Policy Act
AFTIL.....	Airport Facilities Terminal Integration Laboratory	NFHL .....	National Flood Hazard Layer
AGL.....	Above Ground Level	NMFS .....	National Marine Fisheries Service
ALP .....	Airport Layout Plan	NOAA .....	National Oceanic and Atmospheric Administration
AMSL .....	Above Mean Sea Level	NPS .....	National Park Service
APE .....	Area of Potential Affect	NRHP .....	National Register of Historic Places
ARFF .....	Aircraft Rescue and Fire Fighting	NWI .....	National Wetlands Inventory
ATCT .....	Air Traffic Control Tower	NWIS .....	National Water Information System
BIL .....	Bipartisan Infrastructure Law	PEA .....	Programmatic Environmental Assessment
BLM .....	Bureau of Land Management	ROD .....	Record of Decision
BMP .....	Best Management Practices	ROFA .....	Runway Object Free Area
CFR .....	Code of Federal Regulations	ROFA .....	Runway Object Free Area
CZMA .....	Coastal Zone Management Act	SGCN .....	Species of Greatest Concern
DOT .....	Department of Transportation	SHPO .....	State Historic Preservation Office
EA .....	Environmental Assessment	SUN .....	Friedman Memorial Airport
ECOS .....	Environmental Conservation Online System	TCP .....	Traditional Cultural Property
EPA .....	Environmental Protection Agency	USFWS .....	United States Fish and Wildlife Service
ESA .....	Endangered Species Act	USGS .....	United States Geological Survey
FAA .....	Federal Aviation Administration	VISTA .....	Virtual Immersive Siting Tower Assessment
FBO .....	Fixed Based Operator	WHMP .....	Wildlife Hazard Management Plan
FEMA .....	Federal Emergency Management		
FMAA .....	Friedman Memorial Airport Authority		
FONSI .....	Finding of No Significant Impact		
IDFG .....	Idaho Department of Fish and Game		
IIJA .....	Infrastructure Investment and Jobs Act		
IPaC .....	Information for Planning and Consultation		
LOS .....	Level of Service		
MOS .....	Modification to Standards		
MPU .....	Master Plan Update		
MSL .....	Mean Sea Level		
NAS .....	National Airspace System		
NAVAID .....	Navigational Aid		

## Section 1 Background/Proposed Action

### 1.1. Overview

The Friedman Memorial Airport Authority (FMAA or Sponsor) is proposing to replace the existing Airport Traffic Control Tower (ATCT) at the Friedman Memorial Airport (SUN or Airport). The existing federal contract ATCT at SUN is located within the Runway Object Free Area (ROFA) and Part 77 transitional surface. The Infrastructure Investment and Jobs Act (IIJA; Public Law [P.L.] 117-58), enacted on November 15, 2021, formerly referred to as the Bipartisan Infrastructure Law (BIL), appropriated \$25 billion (B) over a five-year period (Fiscal Year 2022 [FY22] to 2026 [FY26]) for National Airspace (NAS) improvements, which includes airport traffic control (ATO) and other airport infrastructure projects. As a result, the Federal Aviation Administration (FAA) Air Traffic Organization (ATO) established the ATCT Replacement Program to use the IIJA funding to replace existing FAA-owned ATCTs at mainly non-major airports with modern ATCT facilities (FAA, n.d. (a)). The National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] § 4321 et seq.) requires that a federal agency prepare a statement of environmental impacts as part of the development process for projects requiring a federal action, such as funding, approving, or permitting.

The FAA prepared a Final Programmatic Environmental Assessment (PEA) for the ATCT Replacement Program (referred to as ATCT Final PEA<sup>1</sup>) (FAA ATCT PEA, 2023) in accordance with NEPA; FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*<sup>2</sup>; the Fiscal Responsibility Act of 2023 (P.L. 118-5); and other applicable federal laws and regulations. The ATCT Final PEA provided sufficient evidence and analysis for a Finding of No Significant Impact (FONSI) / Record of Decision (ROD) determination (FAA ATCT Final PEA, 2023).

Although the 2023 PEA was initially developed for FAA-owned towers, the FAA determined that since the ownership of the ATCT is irrelevant to the environmental impacts, the PEA can be used for other ATCT replacement towers. This ATCT EA for SUN tiers<sup>3</sup> from the ATCT Final PEA to evaluate the existing environment and analyze the reasonably foreseeable environmental consequences of the proposed alternatives at a site-specific level through the framework

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<sup>1</sup> BIL ATCT Final PEA available at: <https://www.faa.gov/air-traffic/bilatctfinalpea21sept2023signed>.

<sup>2</sup> FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, was published on July 3, 2025. Projects that commence after July 3, 2025, are required to comply with FAA Order 1050.1G, while those projects already underway by that date may follow FAA Order 1050.1F. While the original PEA was completed under FAA Order 1050.1F, tiered EAs will be completed under FAA Order 1050.1G. This change between Orders encompasses and relies upon the Fiscal Responsibility Act of 2023; Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit Based Opportunity*; Executive Order 14154, *Unleashing American Energy*; and the Supreme Court decision in *Seven County Infrastructure Coalition v. Eagle County*, 605 U.S. 168 (2025). As a result, this tiered EA does not include an analysis of environmental justice, climate change, or cumulative impacts.

<sup>3</sup> Tiering in accordance with NEPA is defined in FAA Order 1050.1G, Section 3.1.

established by the ATCT Final PEA and FONSI/ROD. This ATCT EA is developed in compliance with the current NEPA procedures in FAA Order 1050.1G and US DOT Order 5610.1D.

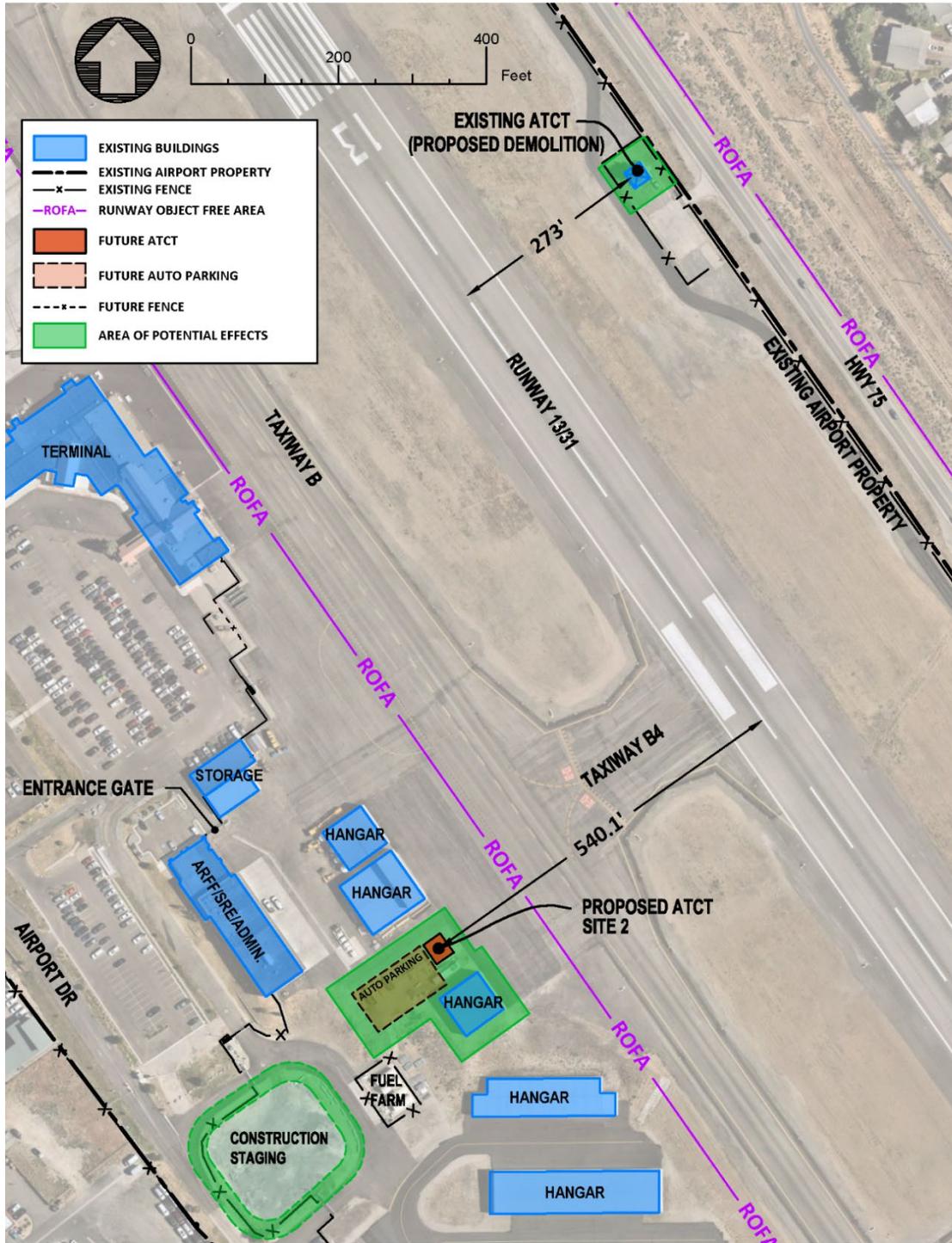
## 1.2. Proposed Action

The Proposed Action will relocate the ATCT outside the ROFA and replace it with an updated facility meeting FAA ATCT siting criteria guidance contained in FAA Order 6480.4C, *Airport Traffic Control Tower Siting Process*. **Figure 1.1** provides an aerial image of the project site, study area considered in this EA, and the Proposed Action. The Proposed Action is anticipated to include:

- Acquisition of a new lease with the Airport Authority to construct a replacement ATCT in a new location.
- Approval of a new Airport Layout Plan (ALP) incorporating the relocation of the ATCT.
- Construction and operation of a new approximately 84-foot ATCT (plus approximately 17-foot-high antennas) and associated facility support features such as fencing and vehicle parking on an approximately 0.3-acre site southeast of the terminal building.
- Extension and/or relocation of access roads and utilities to the replacement ATCT.
- Installation of modern air traffic control electronic equipment in the replacement ATCT.
- Commissioning of the replacement ATCT, cutover of air traffic services to the replacement ATCT, and decommissioning of the existing ATCT.
- Demolition and disposal of the existing ATCT and associated infrastructure within the Runway Object Free Area (ROFA), including portion of fence surrounding existing ATCT.
- Relocation of existing radio communications link repeater to enable project implementation.

The proposed timeframe to replace the ATCT is approximately five years from the start of construction to the air traffic services cutover and demolition of the existing ATCT. Construction is expected to begin in 2027 with the new ATCT opening in 2032.

Figure 1-1 Aerial Image of Study and Area of Potential Effects (APE)



Sources: SUN Airport, 2025; Mead & Hunt, 2025; NearMap Imagery, June 20, 2024.

### 1.3. Background

#### 1.3.1. *Airport Information*

The Friedman Memorial Airport (SUN or Airport) is located in Blaine County in the City of Hailey, Idaho. The Airport is the primary airport providing commercial service to an average of 260,000 passengers annually and general aviation air services for the Wood River Valley and South-Central Idaho, including the communities of Hailey, Bellevue, Ketchum, Sun Valley, and Carey. In 1931, the Friedman family deeded a portion of their land to the City of Hailey for use as an airport, with the condition that, if the land should ever cease to be used as an airport, the property would revert back to the Friedman heirs. In the years since, the Airport has expanded and grown its facilities and traffic through investment from the City of Hailey, Blaine County, the State of Idaho, and the Federal Aviation Administration (FAA). Commercial passenger service at the Airport began in 1960 and has thrived since then. In 1994, the Friedman Memorial Airport Authority (FMAA or Sponsor) was formed through a Joint Powers Agreement between Blaine County and the City of Hailey, replacing the Blaine County Airport Commission.

The FAA categorizes the Airport as a non-hub commercial service airport. SUN is served by one runway, Runway 13/31, which has a full-length parallel taxiway with seven exit taxiways. The majority of the Airport's existing landside facilities are located west of Runway 13/31, and include the commercial passenger terminal, the Fixed-Base Operator (FBO), the general aviation hangars and apron, and other services. The ATCT is located east of Runway 13/31.

#### 1.3.2. *Existing Airport Traffic Control Tower Information*

Constructed in 1985, the existing contract ATCT is not one of the standard FAA design types (see **Figure 1.2**) and has an FAA ATCT Facility Level of 1. The ATCT has a cab size of 144 square feet with cab eye level at 28 feet above ground level (AGL). The existing ATCT is approximately 31 feet-6 inches tall with antennas up to 18 feet-9 inches tall (a maximum height of approximately 50 feet-4 inches). The ATCT operates daily from 0700 to 2300 Local time and controllers maintain all air-to-ground communications and visual signaling within five nautical miles and up to 2,500 feet of elevation above the airport during these hours. The existing ATCT is located to the northeast of the commercial service passenger terminal on the east side of Runway 13/31 at 43°30'27.78"N, 114°17'53.22"W.

Figure 1-2 Photo of Existing ATCT at SUN



Source: Google Earth, 2025.



## Section 2 Purpose and Need

This Purpose and Need is tiered from, and consistent with the ATCT Final PEA (FAA ATCT Final PEA, 2023), but focuses on the specific requirements of the SUN ATCT.

### 2.1. Purpose

The SUN ATCT is an airport-owned federal contract tower (FCT) ATCT that is eligible for replacement under the ATCT Replacement Program. The purpose of the Proposed Action is to replace the SUN ATCT with a modern ATCT located outside airport approach surfaces and runway safety areas with an updated facility meeting FAA ATCT siting criteria guidance, providing for uninterrupted air traffic control services.

The Proposed Action at this airport would provide for a modern, operationally efficient ATCT that would meet applicable FAA requirements. This replacement ATCT would enable the installation of modern and required air traffic control equipment, improve visibility of the airport property by controllers, provide adequate space and an enhanced work environment for ATCT personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design including energy efficient features, windows, and ventilation/heating systems while meeting applicable FAA requirements.

### 2.2. Need

The FAA recognizes the need to provide continual air traffic control services at SUN. The existing SUN ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, does not meet personnel space requirements, does not meet modern Americans with Disabilities Act (ADA) requirements, lacks modern amenities, and has physical problems such as maintenance-intensive deficient mechanical appurtenances (i.e., heating and ventilation, plumbing). Improvements made to rectify the needs must ensure uninterrupted air traffic control services to maintain the safety of the NAS.

The existing ATCT is located on the east side of the airfield within the Runway Object Free Area (ROFA) and it is a Part 77 transitional surface penetration. Additionally, it does not meet FAA ATCT siting criteria guidance contained in FAA Order 6480.4C, *Airport Traffic Control Tower Siting Process*. The existing ATCT is currently deficient in terms of technology, cab height, and location to support the existing and future role of the Airport.

Due to the surrounding mountainous terrain and frequent low-visibility conditions, operations at SUN are extremely technical. The ATCT substantially decreases the risk of runway incursions and other accidents, and on-site monitoring of weather conditions provided by the ATCT is invaluable

to pilots negotiating takeoffs and landings. In addition, the Airport's head-to-head operational pattern (or opposite direction operations) and single parallel taxiway necessitate substantial coordination by tower personnel to properly accommodate takeoffs and landings and maintain efficiency. An ATCT is also necessary for SUN to maintain commercial passenger service operations.

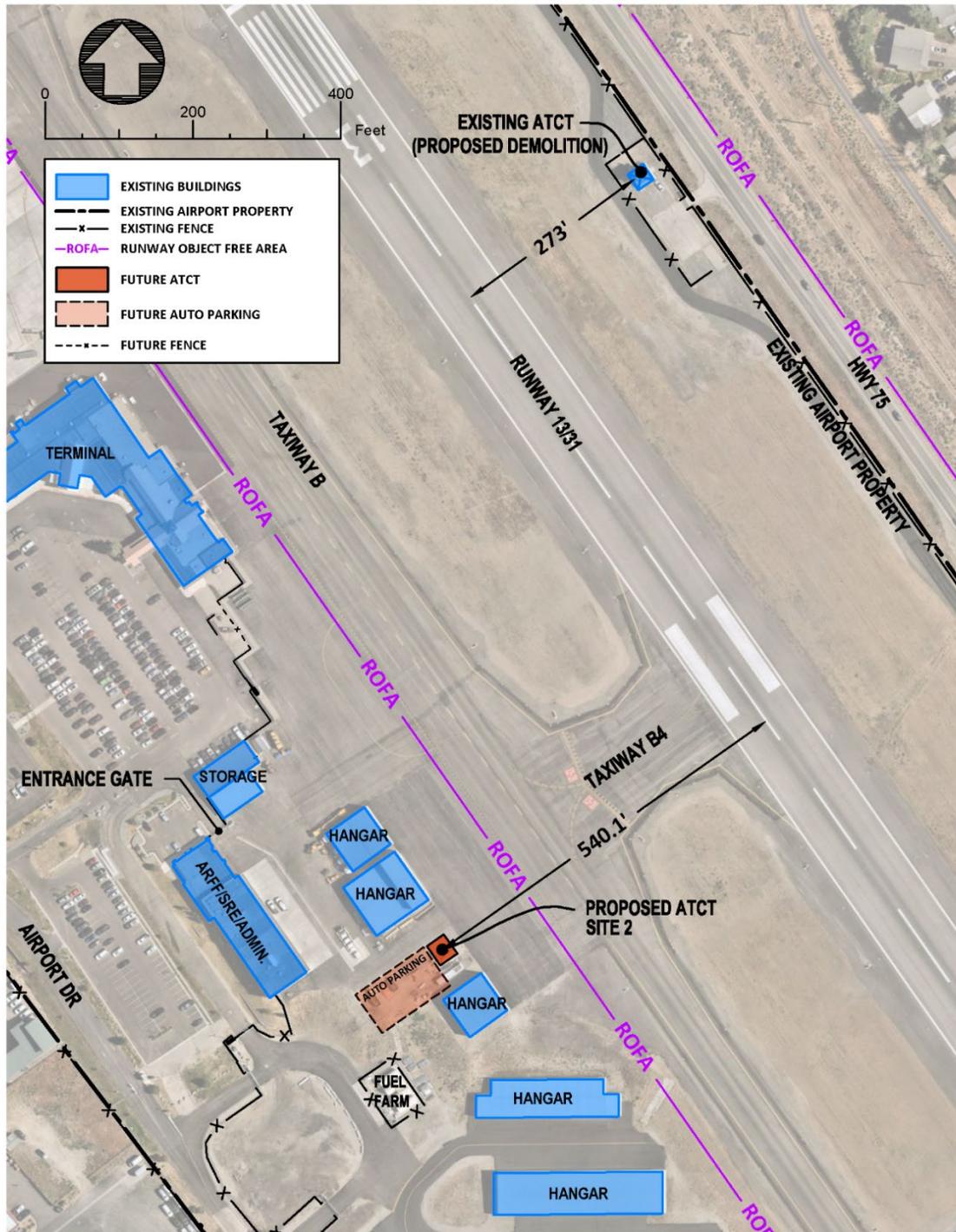
The Airport is currently undergoing a Master Plan Update (officially titled the Airport Infrastructure and Optimization Study). This Study will evaluate the potential for future Modification of Standards (MOS) that might be applied for in the future. Currently, the Airport is operating under a nonstandard Condition where the existing ATCT is located within the Runway Object Free Area (ROFA). The Airport and FAA are working to resolve this nonstandard condition by replacing and relocating the existing ATCT.

## Section 3 Alternatives

In compliance with FAA Order 6480.4C, *Siting of Airport Traffic Control Towers*, the FAA adheres to a siting process to determine the single-most technically feasible site for the establishment or replacement of an ATCT facility (FAA, 2025). This siting process takes into consideration multiple technical criteria, as prescribed in FAA Order 6480.4C. Representatives from the FAA and SUN conducted a siting study for this project using FAA’s Virtual Immersive Siting Tower Assessment (VISTA) modeling process.

This tiered EA evaluates the selected site alternative (as determined by the ATCT siting process) and no build alternative for the proposed replacement of the SUN ATCT. Other alternatives which were considered in the siting report were not carried forward as they did not meet the technical siting criteria as outlined in FAA Order 6480.4C. **Figure 3.1** provides an aerial image of the preliminary proposed layout plan for the replacement tower, the demolition of the existing tower, and the study area considered within this EA.

Figure 3-1 Aerial Image of Study Area and Proposed Action



Sources: SUN Airport, 2025; Mead & Hunt, 2025; NearMap Imagery, June 20, 2024.

### 3.1. Alternative 1: Proposed Action

The proposed action, as determined by the siting process described in FAA Order 6480.4C, *Siting of Air Traffic Control Towers*, is for the construction and operation of a replacement ATCT. The Proposed ATCT location is located at a latitude of 43°30'17.50"N and longitude of 114°17'56.75"W, approximately 1,070 feet southwest of the existing ATCT. This location was deemed most technically feasible of the potential siting alternatives considered, based on the siting criteria reference in Chapter 3 of the PEA (FAA, 2023). The Proposed ATCT location is near the center of the Airport between two privately owned hangars on an approximately 0.3-acre site. The Proposed ATCT location provides the most optimal visibility of the considered alternatives. The Proposed ATCT location is an open lot that has been graded and is covered by asphalt and gravel, just south of Taxiway B and Connector B4. The proposed tower cab floor is 65 feet above ground level (AGL) and 5,368 feet above mean sea level (MSL), with a total tower height of 84 feet AGL. This is the minimum height that would meet all siting criteria under the Safety Management System (Payne, 2025). At this height, controllers would have unobstructed views of all airport controlled areas and all airborne traffic. The four-sided tower is anticipated to have an approximately 500 square foot cab on a 32 feet by 28 feet rectangular shaft. The proposed design is expected to include space for four air traffic controller positions: Ground Control, Local Control, Flight Data, and Supervisor. Stairs would be located opposite the Ground Control position. This proposed design would allow for a safe operating environment and would include upgrades for resistance against seismic events that have potential to occur in the area (USGS, 2024). New utilities (water, power, gas, telephone) would be placed from existing lines within the study area. Existing local roads would be used for construction and maintenance traffic.

The Proposed Action also includes the demolition of the existing SUN ATCT and the associated inner portion of perimeter fence surrounding the ATCT site. Upon demolition of the existing ATCT, the site would be converted to match similar conditions of the surrounding area. Utilities that tie to the existing ATCT would be disconnected or abandoned.

### 3.2. Alternative 2: No Action Alternative

The No Action Alternative is defined as maintaining the status quo (baseline conditions) without federal agency involvement. The No Action Alternative is used to evaluate the effects of not replacing the ATCT and provides a benchmark against which other alternatives may be evaluated. Therefore, for purposes of comparative analysis in this EA, the No Action Alternative represents the conditions that would be anticipated if Alternative 1 (Proposed Action) were not implemented.

## Section 4 **Affected Environment and Environmental Consequences**

This Section describes the existing resource conditions or affected environment at SUN and surrounding areas. This section also evaluates reasonably foreseeable environmental impacts related to each environmental impact category defined by FAA Order 1050.1G, FAA National Environmental Policy Act Implementing Procedures.

As detailed in the ATCT Final PEA and FONSI/ROD, the FAA identified and analyzed reasonably foreseeable environmental impacts for the broad scope of actions planned for ATCT replacement activities. The programmatic approach allows the FAA to review project-specific details and potential impacts during the planning and site selection process for those ATCT projects within the scope of the PEA analysis.

### **4.1. Resource Categories Previously Reviewed by the ATCT Final PEA**

The ATCT Final PEA and FONSI/ROD identified several resource categories as having “no significant impact” (FAA, 2023). FAA reviewed the following eight resource categories for project specific impacts and determined that the Proposed Action effects would be consistent with the PEA and no significant impacts would occur to the resources from implementation of the Proposed Action. Those resources are:

- Aviation Emissions and Air Quality<sup>4</sup>
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Land Use
- Natural Resources and Energy Supply
- Noise
- Socioeconomics, Environmental Justice<sup>5</sup> and Children’s Environmental Health and Safety Risks

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<sup>4</sup> FAA Order 1050.1G, *FAA Environmental Policy Act Implementing Procedures*, was published on July 3, 2025. Projects that commence after July 3, 2025 are required to comply with FAA Order 1050.1G, while those projects already underway by that date may follow FAA Order 1050.1F. While the original PEA was completed under FAA Order 1050.1F, tiered EAs will be completed under FAA Order 1050.1G. This change between Orders encompasses and relies upon the Fiscal Responsibility Act of 2023; Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit Based Opportunity*; Executive Order 14154, *Unleashing American Energy*; and the Supreme Court decision in *Seven County Infrastructure Coalition v. Eagle County*, 605 U.S. 168 (2025). As a result, this tiered EA does not include an analysis of environmental justice, climate change, or cumulative impacts.

<sup>5</sup> On January 21, 2025, President Trump issued Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*. Due to the rescission of prior Executive Orders regarding environmental justice and the recent action by the Council on Environmental Quality (CEQ) to rescind the NEPA implementing regulations, it is no longer a legal requirement or the policy of the federal government to conduct an environmental justice analysis. Any

The resource categories above were programmatically cleared in the ATCT PEA and FONSI/ROD.

### 4.2. Resource Categories Requiring Site-Specific Analysis per the ATCT Final PEA

The ATCT Final PEA also identified resource categories that were unlikely to be significantly impacted but would require a site-specific analysis (FAA, 2023). In accordance with the ATCT Final PEA, this EA reviews those resource categories. Regulatory requirements for these resource categories can be found in more detail in the ATCT Final EA.

#### 4.2.1. Biological Resources (Including Fish, Wildlife, and Plants)

Biological resources include native plants, animals, and their habitats. This section evaluates species and habitat protected under the Endangered Species Act, the Migratory Bird Treaty Act (MBTA), the Bald and Golden Eagle Protection Act (BGEPA), and the Magnuson-Stevens Fishery Conservation and Management Act. Relevant information on Biological Resources is included in **Appendix A**.

It is important to note that the Airport is managed to support aviation safety, and facilitating or encouraging wildlife habitat can create conditions incompatible with, or that pose a threat to, aviation safety. The Airport is actively managed to promote aviation safety and as such discourages the presence of wildlife species. The FAA does not support the creation, conservation or enhancement of habitat to attract wildlife species on airports. Additionally, the proximity of the Airport to the surrounding neighborhoods, agricultural areas, and business establishes a less-than-ideal habitat for most terrestrial and aquatic plant and animal species. High-quality habitat for wildlife species is not present at the Airport. No aquatic habitat is present within or adjacent to the proposed ATCT site or the existing ATCT site.

#### Affected Environment

##### Vegetation

SUN is located in Hailey, Idaho within the U.S. Environmental Protection Agency's (EPA) Level IV Ecoregion 12c, a subsection of the Idaho Snake River Plain. The Airport is bordered by agricultural land to the south. To the west of the Airport, there is a mixture of light industrial and lower-density residential areas. Commercial and light industrial development is located northwest of the Airport. North and east of the Airport is a mixture of residential, recreation, and commercial uses. Residential land uses are located east and southeast of the Airport along with agricultural and open/undeveloped land. The proposed ATCT site is centrally located within the airport

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prior data gathering, analysis, or discussion regarding environmental justice is not relevant for purposes of evaluating the NEPA significance of this project, nor did it play any role in agency decision-making.

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## Affected Environment and Environmental Consequences

property and surrounded by existing buildings, hangars, Taxiway Bravo, and vehicle roadways and parking. The proposed ATCT site is located on an asphalt and gravel covered lot with no vegetation. The existing ATCT site is located directly west of State Highway 75 and east of Runway 17/35, and is surrounded by gravel and asphalt, as well as the airport perimeter fence on the east. No vegetation is present.

### Wildlife and Fish

The Information for Planning and Consultation (IPaC) database was queried on August 20, 2025, to identify species and critical habitats within or near the proposed project area (see **Appendix A**). IPaC identified two insect species with the potential to occur within the Project Area: Monarch Butterfly (*Danaus plexippus*), and Suckley's Cuckoo Bumble Bee (*Bombus suckleyi*). Because of the developed nature of the existing ATCT and proposed ATCT sites, habitat for these species is not present. It is unlikely that either of these species would use the proposed project site as a permanent habitat. The IPaC report did not identify any critical habitats within the proposed project area.

### Special Status Species

Special status species typically inhabit unique or specific areas, such as riverine forests, wetlands, or native ecosystems. According to the USFWS Environmental Conservation Online System (ECOS), there are 12 special status species known to occur within Blaine County, Idaho. However, as previously noted, the Airport environment does not provide suitable habitat for these species (see **Appendix A**). No federal or state-listed endangered, threatened, or candidate species have been documented or observed within the study area.

The Little brown bat (*Myotis licifugus*) has not been observed at the existing tower and the surrounding open space doesn't provide adequate foraging habitat for bats, as it is regularly mowed and maintained, prohibiting an accumulation of prey (insects). The Airport's top priority is to maintain safe airport operating conditions, which are not conducive to supporting bat habitats.

Idaho Fish and Game (IDFG) correspondence confirmed that given the disturbed nature of the existing tower site and the Proposed ATCT site, no impacts to Species of Greatest Conservation Concern (SGCN) or wildlife are expected (see **Appendix B**).

### Migratory Birds

Idaho is located in the Pacific Flyway for migratory birds. The USFWS IPaC report lists 10 migratory bird species with breeding seasons between January 1<sup>st</sup> to September 31<sup>st</sup> as potentially using or passing through the proposed project area, including one species protected by the Bald and Golden Eagle Protection Act, the Bald Eagle (*Haliaeetus leucocephalus*). According

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## Affected Environment and Environmental Consequences

to Airport staff, no Bald or Golden Eagles (*Aquila chrysaetos*) have ever been observed in the study area or at the Airport.

Because the proposed project is confined to the existing paved areas of the Airport that are proximate to the airfield, it is unlikely habitat for any of these migratory bird species. Further, the proposed project does not include the removal of trees (or other potential nesting habitat for these species).

### Invasive Species

The Proposed ATCT location is covered in asphalt and gravel, and the soil type is classified as Gimlett very gravelly sandy loam (USDA, 2024). The existing tower site is also covered in gravel and asphalt with a soil type classified as Little Wood very gravelly loam (USDA, 2024). There are nine invasive species in Blaine County that can thrive in this soil type (Blaine County, n.d.; Idaho State Department of Agriculture, n.d.). None of these invasive species were identified at either site during the October 17, 2025, site visit. Noxious and invasive plant species can be spread by vehicles, machinery, wildlife, and by natural forces such as wind or water. Areas that are disturbed or impacted by construction and/or vehicle activity may be vulnerable to the introduction and spread of noxious weeds due to transportation of species.

### Environmental Consequences

According to FAA Order 1050.1G, a project would have significant impact to biological resources when USFWS or the National Marine Fisheries Service (NMFS) determines that the action would likely 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. To determine whether or not the Proposed Action would affect biological resources, the factors considered for analysis are whether the action would have the potential for:

- A long-term or permanent loss of unlisted plant or wildlife species, i.e., extirpation of the species from a large project area (e.g., a new commercial service airport);
- Adverse effects to special status species (e.g., state species of concern, species proposed for listing, migratory birds, bald and golden eagles) or their habitats;
- Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations; or
- Adverse effects on a species' reproductive success rates, natural mortality rates, non-natural mortality (e.g., road kills and hunting), or ability to sustain the minimum population levels required for population maintenance.

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## Affected Environment and Environmental Consequences

### Alternative 1: Proposed Action

The Proposed Action would involve construction on a previously disturbed portion of SUN property and demolition of the existing ATCT. The proposed ATCT location consists of gravel, asphalt pavement, and an area with sparse weed cover adjacent to Taxiway Bravo and between two existing hangars. No protected vegetation species exist. No critical habitat exists at this location. Construction activities are not likely to have an impact on any wildlife, fish, migratory birds, or special status species.

### Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and the activities associated with the ATCT would remain the same. No impacts to existing biological resources would occur.

### Mitigation Commitments

No mitigation is required or proposed.

#### **4.2.2. Coastal Resources**

Coastal Resources are the natural resources occurring within coastal waters and adjacent shorelands. Coastal resources include islands, transitional and intertidal areas, salt marshes, wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as fish and wildlife and their respective habitats within these areas. There are no coastal resources as defined by the Coastal Barrier Reef Act present within or near the proposed project area. Therefore, coastal resources have been excluded from further analysis.

### **4.2.3. Historical, Architectural, Archaeological, and Cultural Resources**

Historic and cultural resources are sites, structures, buildings, districts, or objects, associated with important historic events or people, demonstrating design or construction associated with a historically significant movement, or with the potential to yield historic or prehistoric data, that are considered important to a culture, a subculture, or a community for scientific, traditional, religious, or other reasons (NPS, 1997). Historic and cultural resources may be subdivided into the following categories: Archaeological resources, Architectural resources, Native resources, and Traditional cultural properties (TCPs).

Historic, architectural, archaeological, and cultural resources were reviewed in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended. Section 106 requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve.

#### Affected Environment

In accordance with applicable federal laws and regulations, the FAA evaluated the proposed alternatives and APE for historic and cultural resources. The APE is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” (36 CFR § 800.16 (d)).

Actions that have the potential to affect historic and cultural resources typically involve construction, ground disturbance, or modification of a historic property or a property in the viewshed of a historic property or district. Other effects to consider include noise, vibration, lighting, and increased traffic. The proposed ATCT will be 84 feet tall, which is 52 feet–6 inches taller than the current ATCT (31 feet–6 inches); however, the height difference is not enough to necessitate a larger APE for light and visual considerations. The APE is defined in **Figure 4.1**.

Based on a site search of the Idaho Cultural Resource Information System (ICRIS) and the National Register of Historic Places (NRHP) Database, there are no historical or archaeological resources within the APE. The nearest determined eligible resource is US SH-75 (10LN817), which is outside and approximately 30 feet east of the or immediately adjacent to the proposed western project area/APE.

The existing ATCT was constructed circa 1985 (less than 50 years old) and was re-surveyed in 2017 as part of the Cultural Resource Report for the Friedman Memorial Airport Land Acquisition and Obstruction Removal Environmental Assessment. Documented as Resource #1 as part of the Airport (documented as FMA-01), the existing ATCT was previously determined to be not eligible for NRHP listing by FAA with Idaho State Historic Preservation Office (SHPO) concurrence on May 1, 2018 (Davis & Wright, 2018).

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## Affected Environment and Environmental Consequences

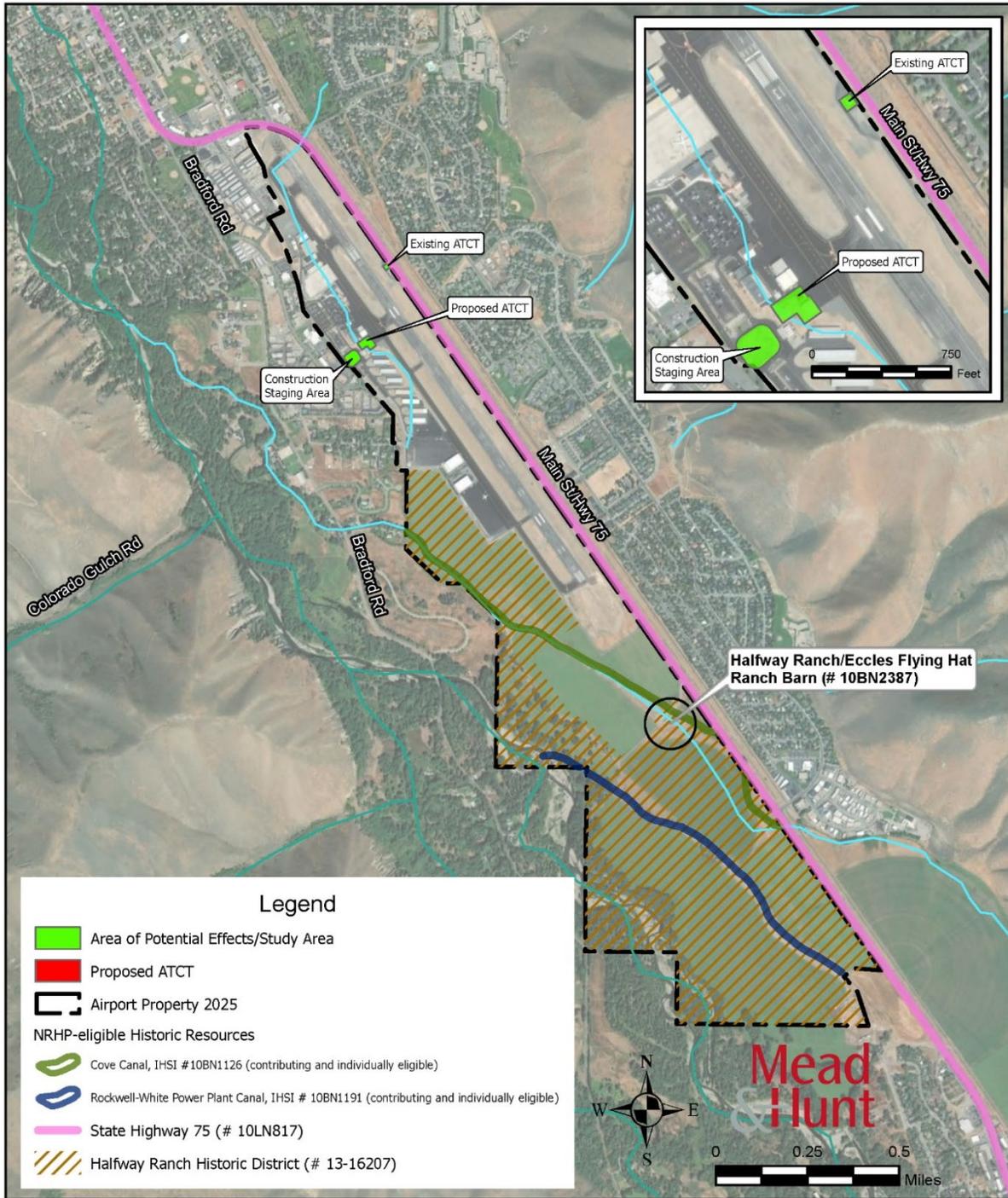
In 2022 the Airport acquired 386 acres at the southern end of the Airport, which include the following NRHP-eligible resources:

- Halfway Ranch/Eccles Flying Hat Ranch Historic District (13-16207) (west of SH-75) at the nearest point, is 0.38 miles southwest of the APE. This portion of the historic district consists of open fields, and the nearest building within the district is 1.2 miles south/southeast of the APE.
- Halfway Ranch /Eccles Flying Hat Ranch Barn (previously recorded as a part of the SH-75 EIS) is 1.2 miles south/southeast of the APE.
- Cove Canal (10BN1126) is 0.5 miles south of the APE.
- Rockwell-White Power Plant Canal (10BN1191) is 1.24 miles south of the APE.

All of the buildings and structures are outside of the APE and between 0.5 miles and 1.24 miles south/southwest of the APE. Given the size and scale of the historic district and canals, and the distance of the APE to each eligible resource, the project activities do not diminish the associative and historic characteristics that qualify them for National Register-listing.

# Affected Environment and Environmental Consequences

Figure 4-1 Cultural and Historic Properties Near Proposed Action and APE



Source: National Register of Historic Places



### Environmental Consequences

According to FAA Order 1050.1G, the FAA has not established a significance threshold for Historical, Architectural, Archeological and Cultural Resources. If the Proposed Action would affect Historical, Architectural, Archeological and Cultural resources, the action could result in a finding of Adverse Effect through the Section 106 process.

#### Alternative 1: Proposed Action

The existing ATCT, documented as part of the Friedman Memorial Airport (FMA-01), was previously determined to be not eligible for the NRHP. Construction of the replacement ATCT at would not impact historic or cultural resources within the APE, as none exist within or near the APE. Demolition of the existing ATCT and construction of the replacement ATCT would be compatible with existing airport development and would occur in areas with modern ground disturbance dating to approximately 1984.

The FAA determined that the Proposed Undertaking would have no adverse effect on resources that are on or eligible for the National Register. Idaho State Historic Preservation Office (SHPO) concurred with this finding on November 19, 2025. Both letters are provided in **Appendix C**.

#### Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing historical, architectural, archaeological, and cultural resources would occur.

### Mitigation Commitments

The FAA will require the Airport Sponsor to include an Inadvertent Discovery Plan as a contract provision. In the unlikely event that cultural resources are discovered during construction, demolition, and/or maintenance activities, activity would cease in the area of the resource and the FAA and SHPO would be notified and given the opportunity to review. The uncovered resources would be protected. In compliance with all applicable laws and regulations, the FAA would consult with the SHPO on the discovery. The FAA would consider their recommendations, conduct appropriate actions, then provide a report of those actions after they are completed (36 CFR 800.13).

#### **4.2.4. Department of Transportation, Section 4(f)**

Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1966 (codified in 49 U.S.C. § 303 and 23 U.S.C. §138) applies to projects that receive funding from or require approval by agencies within the DOT and provides for the consideration of certain properties of national,

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## Affected Environment and Environmental Consequences

state, and/or local significance during transportation project development, such as: public owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites.

Before approving a transportation project requiring the use of these properties, the DOT agency must determine that there is no feasible and prudent alternative to using that land and the project includes all possible planning to minimize harm resulting from the use (FAA, 2020a).

The properties proposed for demolition and construction under the proposed alternative are owned and maintained by SUN and do not qualify as Section 4(f) properties. They are not a park, recreation area, or refuge, nor are they historic sites. There are no Section 4(f) properties within the project area. The nearest potential Section 4(f) property, a historic-age linear resource, is State Highway 75 (SH-75/US-75, 10LN817), approximately 30 feet east of the existing ATCT that is proposed for demolition. The Proposed Action does not involve any physical or constructive use of SH 75. Accordingly, removal of the existing ATCT and construction of the new ATCT will not impact the highway's activities, features or attributes. Therefore, this resource category does not require additional analysis within this EA.

### **4.2.5. Visual Effects**

Visual effects are considered under two categories, light emissions, and visual resources/character. Light emissions from outdoor lighting in parking lots, streets, and within businesses or homes affect the darkness of the night sky, particularly in rural areas where fewer light sources are present. Visual character is the overall description of an area, such as rural, farmland, urban, coastal, or mountainous (FAA, 2020a).

### **Affected Environment**

The proposed location of the replacement ATCT is approximately 1,070 feet southwest of the existing ATCT on the west side of Runway 13/31 in the terminal area, south of the passenger terminal and building between two existing hangars. The location of the Proposed ATCT is in a densely developed area of the Airport (the terminal area), whereas the existing ATCT is the only Airport building located on the east side of Runway 13/31. The nearest residences to the site of the proposed replacement ATCT are located approximately 1,100 feet (or approximately 0.2 miles) to the south on Broadford Heights Road. The nearest residences to the existing ATCT are approximately 350 feet east on Briarwood Drive. The area surrounding SUN is characterized by a mix of commercial, light industrial, residential, and recreation to the northwest and north; residential and rural/agricultural to the east and south; and light industrial, rural/agricultural, and rural residential to the west. Once constructed, the replacement ATCT would be the highest structure in the area.

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## Affected Environment and Environmental Consequences

### Light Emissions

The ATCT at SUN operates from 0700 to 2300 daily and the runway, taxiway, and other airfield-related safety lights are operated by the ATCT during operating hours. Currently, the Airport generates light emissions at night from the following facilities: runway, taxiway, navigational aids (NAVAIDs), apron area, parking lots, ATCT, FBO, terminal building, Aircraft Rescue and Firefighting (ARFF) station, hangars, and other similar facilities on the property. The existing ATCT is located approximately 65 feet west of State Highway 75 (SH75), a major transportation corridor and scenic byway that connects the communities of Bellevue, Hailey, and Ketchum.

As mentioned in Section 4.2.1, the light sensitive little brown bat was not identified as a species of concern within the study area and has not been documented within the proposed project area.

### Visual Resources and Visual Character

The visual resources and character within and near the proposed replacement ATCT would be consistent with that of the existing ATCT at SUN. As described above, the area surrounding SUN is characterized by a mix of commercial, light industrial, residential, recreation; and rural/agricultural uses. Other visual resources surrounding SUN property include SH75 on the east side. The primary visual resources within the proposed project area consist of facilities used for Airport operations, including airfield infrastructure, the passenger terminal building, the existing ATCT, SUN administration and storage buildings, fuel farm, parking lots, and hangars. The highest standing structure at SUN is the existing ATCT at 31 feet-6 inches above ground level (AGL).

### Environmental Consequences

According to FAA Order 1050.1G, the FAA has not established a significance threshold for the two categories which fall under Visual Effects – Light Emissions and Visual Resources/Visual Character. To determine whether or not the Proposed Action would affect Light Emissions the factors considered include the degree to which the action would have the potential to:

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

To determine whether or not the Proposed Action would affect Visual Resources/Visual Character the factors considered include the degree to which the action would have the potential to:

- Affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources;
- Contrast with the visual resources and/or visual character in the study area; and

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## Affected Environment and Environmental Consequences

- Block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations

### Alternative 1: Proposed Action

The proposed replacement ATCT would be constructed on previously cleared airport property that is located approximately 1,070 feet southwest of the existing ATCT and adjacent to existing airport development with lighting (i.e., hangars, fuel farm, and administration building), and therefore would not impose any change to light emissions in the immediate area. The reflective surfaces of the replacement ATCT could slightly alter the visual character of the airport area due to the taller tower height and change to the viewshed; however, the change in location of light emissions from the existing tower to the replacement tower is unlikely to create additional light emissions once the existing tower is demolished and the new tower is operational. The addition of a newly lit parking area for the replacement ATCT may result in minimal new light emissions based on the ultimate design, as there are only entrance gate lights at the existing ATCT site. However, there is existing lighting on the adjacent hangars, and therefore, the additional lighting would not change the visual character of the area. The closest off-airport visual receptors (SH 75 and residential development to the north and west, residential development and rural/agricultural uses to the south, and commercial and light industrial development to the east), would receive minimal to no effects from the minor changes in lighting. As the nearest residential area is approximately 0.2 miles away from the Proposed ATCT site, visual and lighting concerns are not anticipated. The changes in lighting are not anticipated to affect the visual nature of the existing developed area and the existing lighting.

Changes to visual resources and visual character from the construction of the replacement ATCT and removal of the existing ATCT would not affect or obstruct visually important resources. Although the replacement ATCT would be approximately 53 feet taller than the existing ATCT, it would not contrast with the visual of the existing and active airport. The Proposed Action would have no impact on visual resources.

### Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing visual effects would occur.

### Mitigation Commitments

No mitigation is required or proposed.

### 4.2.6. *Water Resources*

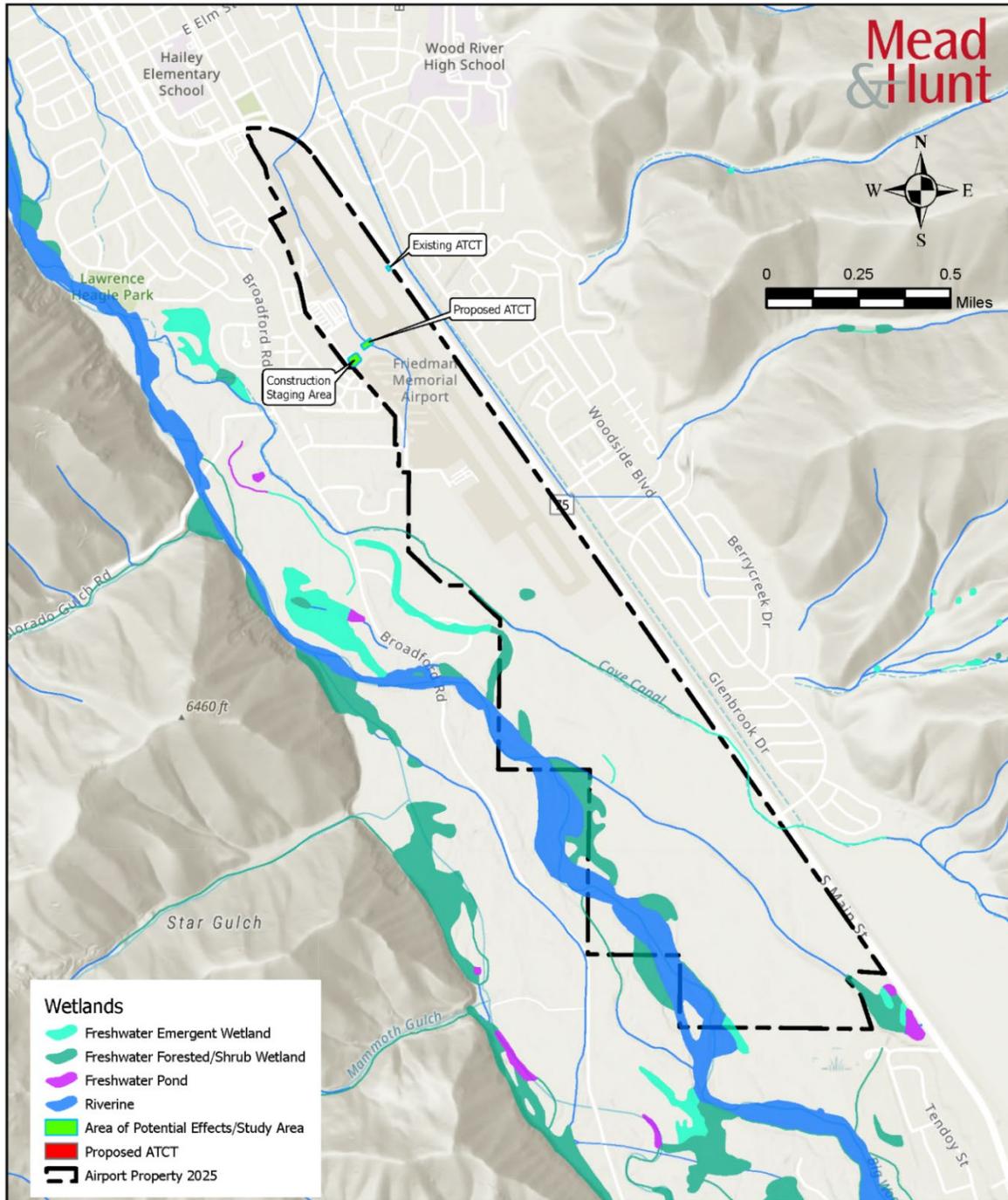
Water resources include wetlands, floodplains, surface water, groundwater, and Wild and Scenic Rivers. These resources provide drinking water, irrigation, and other water uses for communities, in addition to recreation and transportation opportunities, and habitat for vegetation and wildlife species.

#### *Affected Environment*

##### Wetlands

The USFWS National Wetlands Inventory (NWI) indicates that a riverine habitat extends through the site of the proposed ATCT (see **Figure 4.2**); however, the NWI information is outdated. No riverine area is currently present or visible. The Project Construction Area has been previously cleared and heavily disturbed. There are no water resources in or near the location of the proposed demolition or the replacement ATCT. The closest wetland is associated with the Cove Canal, approximately 0.35 miles west of the Proposed Action.

Figure 4-2 Water Resources, Wetlands



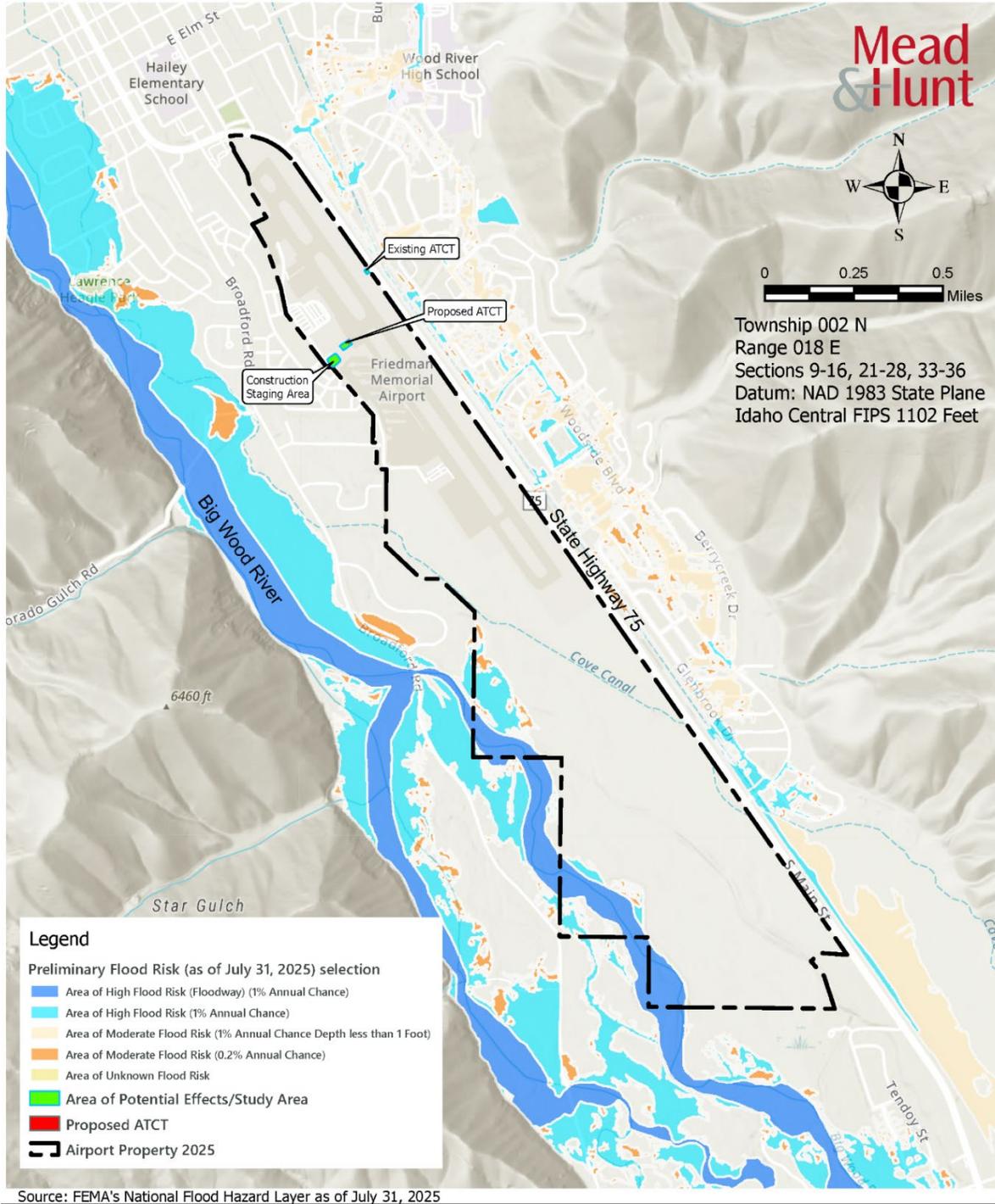
Source: National Wetlands Inventory (HU8 17040219)



### Floodplains

The Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL) indicates that the proposed project area is located in Zone X, an area of minimal flood hazard (see **Figure 4.3**). The land to the northeast of the proposed project area is classified as Zone AE and Zone AH, areas of special flood hazard with increased annual flood hazards of one percent. Zones AE and AH are located approximately 1,100 feet from the proposed project area. The only regulated floodplain near the proposed project area is the Big Wood River and is located approximately 3,000 feet to the southwest of the proposed project area.

Figure 4-3 Water Resources, Floodplains

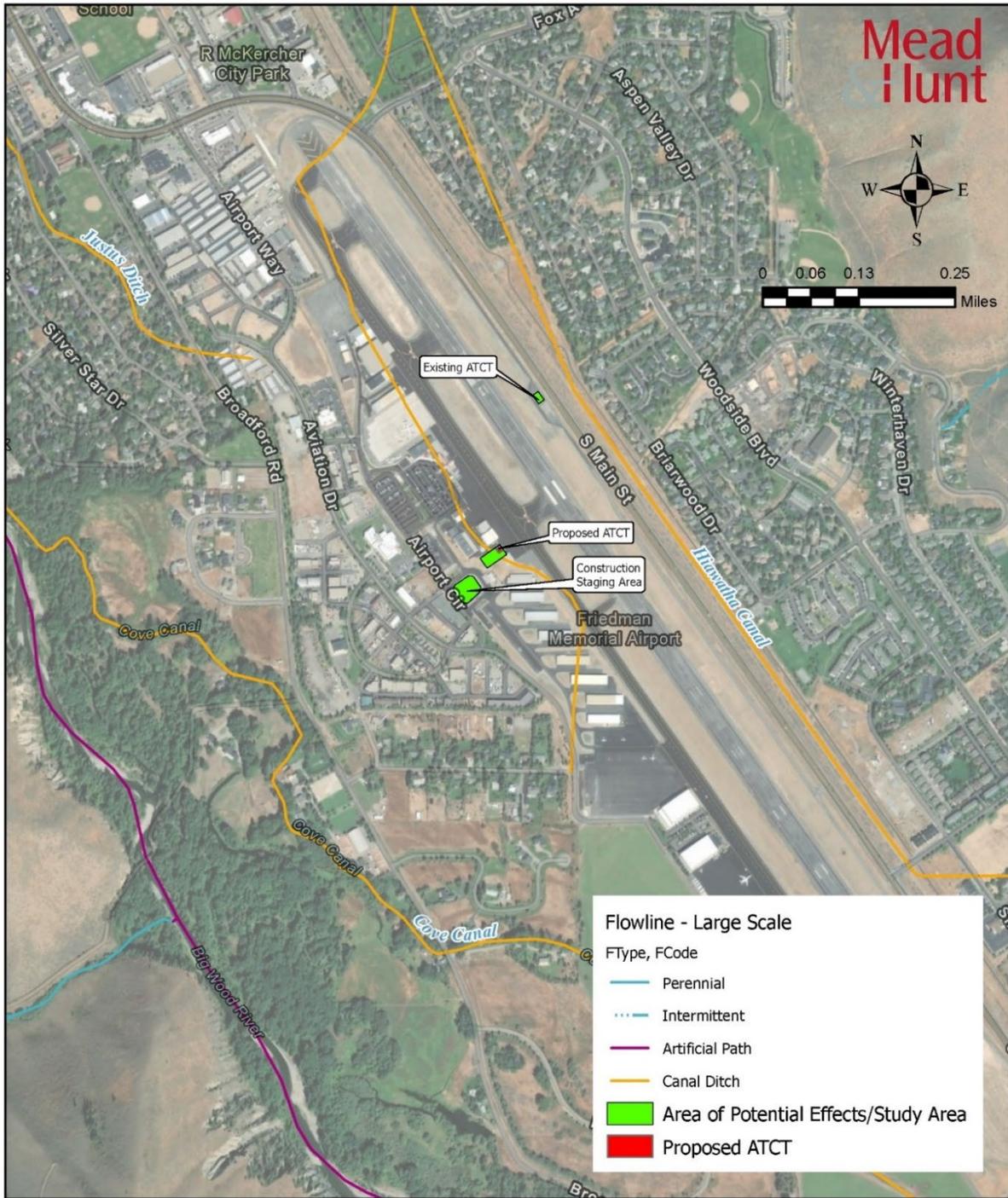


### Surface Waters

There are no human made or naturally occurring surface waters within or near the proposed project area (see **Figure 4.4**). According to the National Hydrography Dataset (NHD), the nearest surface waters are the Big Wood River, which is approximately 0.5 miles west of the proposed replacement ATCT, and Cove Canal, which is approximately 0.5 miles south of the proposed replacement ATCT (USGS, 2023).

# Affected Environment and Environmental Consequences

Figure 4-4 Water Resources, Surface Waters



Source: USGS National Hydrography Dataset (NHD)



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## Affected Environment and Environmental Consequences

### Ground Water

The proposed project area is within the upper valley section of the Wood River Valley Aquifer System, which is approximately 106 square miles in size with a depth-to-groundwater ranging from approximately 10 feet to 90 feet. This system is primarily comprised of Quaternary-age sediments and basalts of the Wood River Valley and its tributaries. In general, groundwater moves down valley into the Bellevue fan of the system, which is south of the upper valley section (Fisher, 2016). There are no wells within the proposed project area (Idaho Department of Water Resources, 2024). The nearest well is a domestic well located approximately 300 feet south of the replacement ATCT and south of the fuel farm.

### Wild and Scenic Rivers

According to the National Wild and Scenic River System map, the Middle Fork Salmon River is the closest Wild and Scenic River to SUN, located approximately 75 miles northwest.

### Environmental Consequences

According to FAA Order 1050.1G a significant effect would occur if water quality standards established by federal, state, local, and/or tribal regulatory agencies were exceeded; or, if public drinking water supplies were contaminated such that public health was adversely affected. Other factors that should be considered are whether the action 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.
- Adversely affect natural and beneficial groundwater values to a degree that substantially diminishes or destroys such values;
- Adversely affect groundwater quantities 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.

When disturbed soil comes into contact with rainwater, a potential for sediment-related pollution to occur in surface waters exists. Stormwater runoff from construction sites is regulated by the IDEQ and may require a Construction Stormwater General Permit.



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## Affected Environment and Environmental Consequences

Under Idaho Code Section 39-120, the Department of Environmental Quality is designated as the primary agency to coordinate and administer ground water quality protection programs for Idaho. The Idaho Groundwater Quality Plan (IDEQ 1996) identifies potential sources of groundwater contamination including construction excavation as a Category V source providing conduit or inducing discharge through altered flow patterns.

The Groundwater Quality Rule (IDEQ 2011) identifies the minimum requirements for the protection of groundwater quality through standards and an aquifer categorization process. It also serves as a basis for the administration of programs that address groundwater quality but does not in and of itself create a permit program. It does, however, require projects that have the potential to degrade groundwater quality utilize site-specific BMPs to minimize potential impacts to groundwater. IDEQ does not identify or specify what the BMPs should be.

### Alternative 1: Proposed Action

Construction of the replacement ATCT would cause temporary, short-term surface disturbing activities in the span of approximately 0.3 acres involving increased vehicle traffic and use of machinery. No direct or indirect impacts to wetlands are expected, as the nearest wetland is approximately 0.35 miles west of the replacement ATCT.

As noted above, the proposed project is not located within a flood hazard area and no impacts are expected to result from the Proposed Action. No surface waters are present in the Proposed Action Area, therefore no effects on surface waters would occur. The Proposed Action would not exceed water quality standards established by Federal, state, local, and tribal regulatory agencies; or contaminate public drinking water supply such that public health may be adversely affected. Runoff containing contaminated soil could result in offsite interference with surface waters downstream from the Proposed Action, such as Cove Canal, but this is considered highly unlikely.

As there are no Wild and Scenic Rivers within proximity of the study area, there would be no significant impacts to this resource as a result of the Proposed Action.

During excavation for the proposed ATCT, groundwater is not expected to be encountered. However, the Contractor must complete all work in compliance with IDEQ Groundwater Rules, namely, as necessary, site-specific BMPs must be put in place to minimize potential for construction-related runoff and infiltration. The Proposed Action does not involve acquiring any new water rights or drilling new wells.



### Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing water resources would occur.

### Mitigation Commitments

The Sponsor would contractually obligate the contractor to obtain and adhere to an Idaho Pollutant Discharge Elimination System (IPDES) Construction General Permit (CGP), as required by law. Grading plans and stormwater design would follow FAA standards for airfield construction (FAA AC 150/5370-10H, Standards for Specifying Construction of Airports).

No other mitigation is required or proposed.

## Section 5 Public Involvement

### 5.1. Public Notice of Availability

The FMAA is providing a 508-compliant electronic copy of this EA for review by the public on the following website: <https://iflysun.com/atct-replacement/> on December, 30 2025. Concurrently, the FMAA published a Notice of Availability advertisement in the Idaho Mountain Express Newspaper to advertise the availability of the Draft EA to allow the public to view the document electronically along with information on where/how to submit comments. Printed copies can be made available upon request.

## Section 6 List of Preparers

### 6.1. Introduction

This EA was prepared for the FAA Helena Airports District Office by Mead & Hunt, Inc. on behalf of the FMAA.

### 6.2. Preparers and Qualifications

The following FAA staff members were directly responsible for preparing the contents of this document:

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The following Mead & Hunt staff members were directly responsible for preparing the contents of this document:

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Mr. Bullard is a CAD Technician with more than 20 years of experience in airport mapping, schematic design, and preparing report graphics.

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## Section 8 **Appendices**

- Appendix A Federally Listed Species Reports for Blaine County and the Study Area
- Appendix B Idaho Fish and Game Correspondence
- Appendix C SHPO Letter and Concurrence
- Appendix D SUN Siting Report
- Appendix E Public Involvement

# Appendix A – Federally Listed Species Reports for Blaine County and the Study Area

# IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

## Location

Blaine County, Idaho



## Local office

Idaho Fish And Wildlife Office

☎ (208) 378-5243

📠 (208) 378-5262

1387 South Vinnell Way, Suite 368

Boise, ID 83709-1657

NOT FOR CONSULTATION

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species<sup>1</sup> and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

- 
1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
  2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

## Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> Wherever found There is <b>proposed</b> critical habitat for this species. Your location does not overlap the critical habitat. <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Proposed Threatened
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> No critical habitat has been designated for this species. <a href="https://ecos.fws.gov/ecp/species/10885">https://ecos.fws.gov/ecp/species/10885</a>	Proposed Endangered

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

## Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act <sup>2</sup> and the Migratory Bird Treaty Act (MBTA) <sup>1</sup>. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds  
<https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>

- Nationwide avoidance and minimization measures for birds  
<https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC  
<https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

### Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

### Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

### Review the FAQs

The FAQs below provide important additional information and resources.

NAME

BREEDING SEASON

**Bald Eagle** *Haliaeetus leucocephalus*

Breeds Jan 1 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

**Golden Eagle** *Aquila chrysaetos*

Breeds Jan 1 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1680>

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of

presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

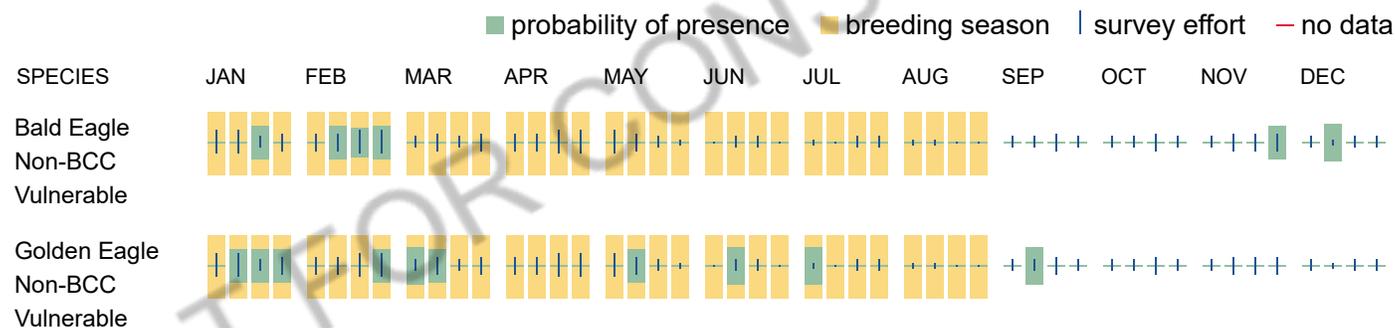
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

### No Data (—)

A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



## Bald & Golden Eagles FAQs

### What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply).

### Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the

potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

### **How do I know if eagles are breeding, wintering, or migrating in my area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **Interpreting the Probability of Presence Graphs**

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

#### ***How is the probability of presence score calculated? The calculation is done in three steps:***

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

#### **Breeding Season ( )**

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

#### **Survey Effort ( )**

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

#### **No Data ( )**

A week is marked as having no data if there were no survey events for that week.

#### **Survey Timeframe**

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

# Migratory birds

The Migratory Bird Treaty Act (MBTA) <sup>1</sup> prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

## Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases [birds of concern](#), including [Birds of Conservation Concern \(BCC\)](#), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the [Nationwide avoidance and minimization measures for birds](#) document, and any other project-specific avoidance and minimization measures suggested at the link [Measures for avoiding and minimizing impacts to birds](#) for the birds of concern on your list below.

## Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles document](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

## Review the FAQs

The FAQs below provide important additional information and resources.

NAME

BREEDING SEASON

<b>Bald Eagle</b> <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Jan 1 to Aug 31
<b>Black Rosy-finch</b> <i>Leucosticte atrata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9460">https://ecos.fws.gov/ecp/species/9460</a>	Breeds Jun 15 to Aug 31
<b>Broad-tailed Hummingbird</b> <i>Selasphorus platycercus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 25 to Aug 21
<b>Calliope Hummingbird</b> <i>Selasphorus calliope</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9526">https://ecos.fws.gov/ecp/species/9526</a>	Breeds May 1 to Aug 15
<b>Cassin's Finch</b> <i>Haemorhous cassinii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9462">https://ecos.fws.gov/ecp/species/9462</a>	Breeds May 15 to Jul 15
<b>Evening Grosbeak</b> <i>Coccothraustes vespertinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Aug 10
<b>Golden Eagle</b> <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1680">https://ecos.fws.gov/ecp/species/1680</a>	Breeds Jan 1 to Aug 31
<b>Lewis's Woodpecker</b> <i>Melanerpes lewis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9408">https://ecos.fws.gov/ecp/species/9408</a>	Breeds Apr 20 to Sep 30

**Olive-sided Flycatcher** *Contopus cooperi*

Breeds May 20 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/3914>

**Rufous Hummingbird** *Selasphorus rufus*

Breeds Apr 15 to Jul 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/8002>

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (I)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

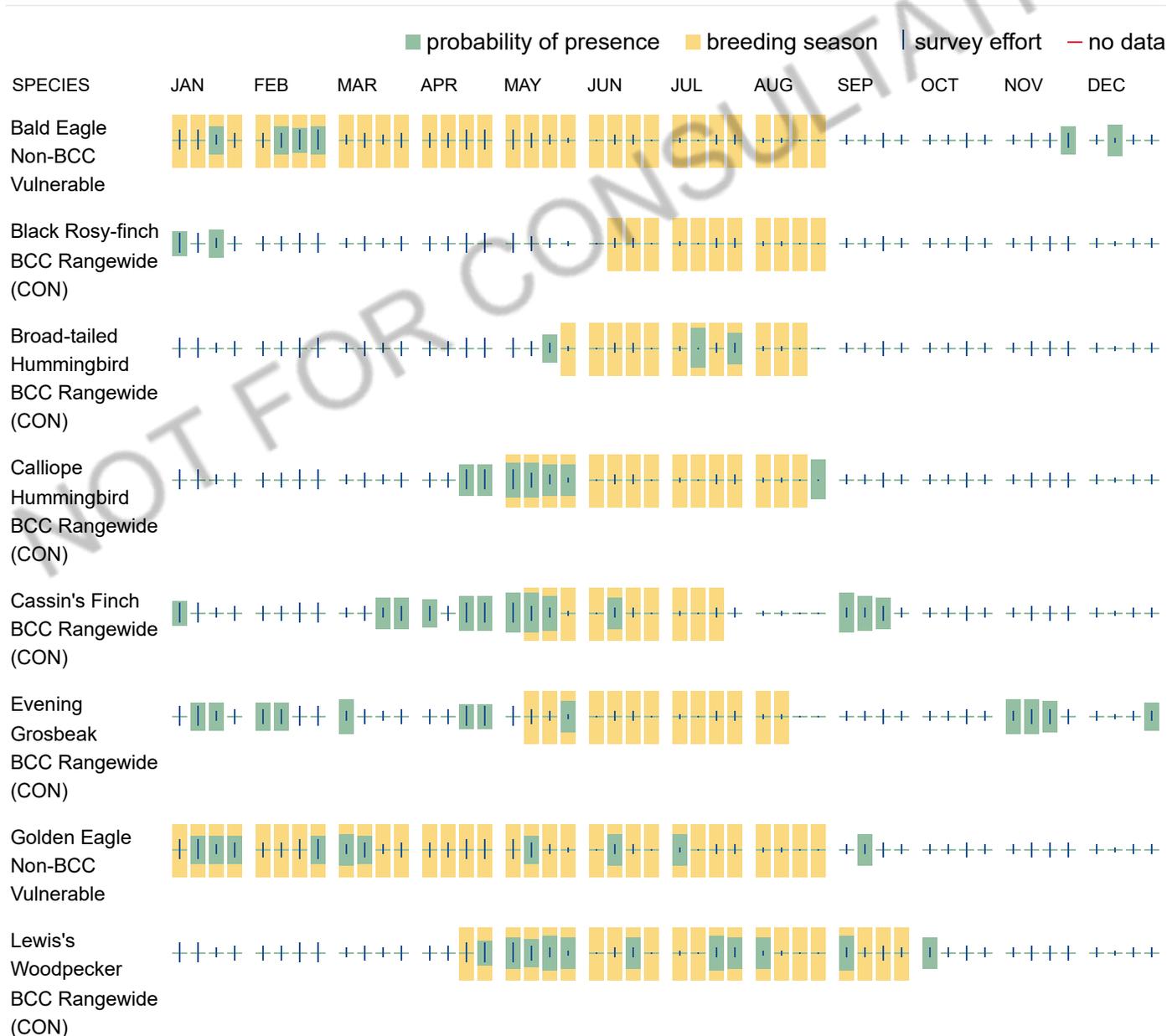
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

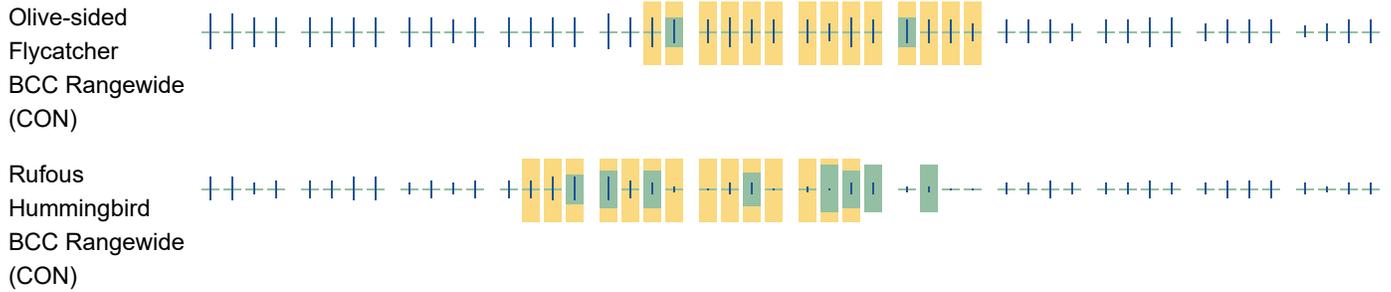
### No Data (-)

A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





## Migratory Bird FAQs

### Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Avoidance & Minimization Measures for Birds](#) describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

### What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the [Bald and Golden Eagle Protection Act](#) and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

### Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

## What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

## How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

## What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Bald and Golden Eagle Protection Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ "Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

## Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

## Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

### **Interpreting the Probability of Presence Graphs**

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

#### ***How is the probability of presence score calculated? The calculation is done in three steps:***

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

### **Breeding Season ( )**

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### **Survey Effort ( )**

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

### **No Data ( )**

A week is marked as having no data if there were no survey events for that week.

### **Survey Timeframe**

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

# Facilities

## National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

## Fish hatcheries

There are no fish hatcheries at this location.

## Wetlands in the National Wetlands Inventory (NWI)

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

RIVERINE  
[R5UBFx](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

**NOTE:** This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

### **Data limitations**

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

### **Data exclusions**

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

### **Data precautions**

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.



[ECOS](#) / [Species Reports](#) / Species County Report

# Listed species believed to or known to occur in Blaine, Idaho

This report includes species only if they have a **Spatial Current Range** in ECOS.

The following report contains species that are known to or are believed to occur in this county, based on the species current range, as defined by the USFWS. The definition of current range that the FWS uses is the general geographic area where we know or suspect that a species currently occurs.

This list of species by county cannot be used for consultation purposes. To obtain an official list of species that should be considered during consultation, please visit [IPaC](#).

CSV

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19 Species Listings

Group	Name	Population	Status	Lead Region
Mammals	Canada Lynx ( <u><a href="#">Lynx canadensis</a></u> )	Wherever Found in Contiguous U.S.	Threatened	6 Montana Ecological Services Field Office

Mammals	Gray wolf ( <u>Canis lupus</u> )	Northern Rocky Mountain Distinct Population Segment: Montana, Idaho, Wyoming, eastern Washington, eastern Oregon, and north central Utah	Recovery	6	Assistant Regional Director- Ecological Services
Birds	Yellow-billed Cuckoo ( <u>Coccyzus americanus</u> )	Western DPS: U.S.A. (AZ, CA, CO (western), ID, MT (western), NM (western), NV, OR, TX (western), UT, WA, WY (western)); Canada (British Columbia (southwestern)); Mexico (Baja California, Baja California Sur, Chihuahua, Durango (western), Sinaloa, Sonora)	Threatened	2	Arizona Ecological Services Field Office

Insects	Suckley's cuckoo bumble bee ( <u>Bombus suckleyi</u> )		Proposed Endangered	7	Anchorage Fish & Wildlife Field Office
Fishes	Bull Trout ( <u>Salvelinus confluentus</u> )	U.S.A., coterminous, (lower 48 states)	Threatened	1	Idaho Fish and Wildlife Office
Fishes	Bull Trout ( <u>Salvelinus confluentus</u> )	U.S.A., coterminous, (lower 48 states)	Threatened	1	Idaho Fish and Wildlife Office
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Fishes	Bull Trout ( <u>Salvelinus confluentus</u> )	U.S.A., coterminous, (lower 48 states)	Threatened	1	Idaho Fish and Wildlife Office
Insects	Monarch butterfly ( <u>Danaus plexippus</u> )	Wherever found	Proposed Threatened	3	Assistant Regional Director- Ecological Services
Snails	Utah valvata snail ( <u>Valvata utahensis</u> )	Wherever found	Original Data in Error - New Information Discovered	1	Idaho Fish and Wildlife Office
Snails	Banbury Springs limpet ( <u>Idaholanx fresti</u> )	Wherever found	Endangered	1	Idaho Fish and Wildlife Office

Birds	Greater sage-grouse ( <u>Centrocercus urophasianus</u> )	Wherever found	Resolved Taxon	6	Wyoming Ecological Services Field Office
Conifers and Cycads	Whitebark pine ( <u>Pinus albicaulis</u> )	Wherever found	Threatened	6	Wyoming Ecological Services Field Office
Mammals	Little brown bat ( <u>Myotis lucifugus</u> )	Wherever found	Under Review	3	Indiana Ecological Services Field Office
Mammals	North American wolverine ( <u>Gulo gulo luscus</u> )	Wherever found	Threatened	6	Montana Ecological Services Field Office
Flowering Plants	Ute ladies'-tresses ( <u>Spiranthes diluvialis</u> )	Wherever found	Threatened	6	Utah Ecological Services Field Office

Showing 1 to 19 of 19 entries

Previous

1

Next

# Appendix B – Idaho Fish and Game Correspondence



**RE: Friedman Memorial Airport - Replacement Tower Project**

From Dawson,Bradley <bradley.dawson@idfg.idaho.gov>  
Date Thu 8/21/2025 2:45 PM  
To Lauren Rasmussen <Lauren.Rasmussen@meadhunt.com>

Thanks Lauren. In my opinion, a formal letter and a data request are both unnecessary for this project. From your description, IDFG is confident that your project will not have impacts on SGCN species as long as there are no bird nests found on the existing tower (a visual inspection should suffice to verify this). If there are, we just recommend conducting your work outside of the nesting season for the bird species in question.

Given the above recommendation, we don't anticipate any impacts to wildlife from this project.

**From:** Lauren Rasmussen <Lauren.Rasmussen@meadhunt.com>  
**Sent:** Thursday, August 21, 2025 2:26 PM  
**To:** Dawson,Bradley <bradley.dawson@idfg.idaho.gov>  
**Subject:** Re: Friedman Memorial Airport - Replacement Tower Project

**CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.**

Hi Bradley,

Yes, we did run an IPaC report and just wanted to make sure we covered state coordination as well. I'm providing some general project information below. Please let me know if you would like us to send a formal correspondence letter and if you think a data request is necessary.

The proposed project involves demolition of the existing ATCT and construction of a new ATCT and associated facilities. The attached figure shows the locations of the existing and proposed facilities (although the proposed ATCT site doesn't show details such as a parking lot that will be on the west side of the tower). The existing ATCT is surrounded by gravel and pavement (see street view photo below). The proposed ATCT site is located between two existing hangars and is currently covered in gravel and asphalt. Both the existing and proposed sites are proximate to the airfield and developed areas of the airport.



Thank you,

Lauren

**Lauren Rasmussen, AICP**  
Direct: 303-729-3768 | [Transfer Files](#)  
[meadhunt.com](#) | **125 Years of Exceptional**

---

**From:** Dawson,Bradley <[bradley.dawson@idfg.idaho.gov](mailto:bradley.dawson@idfg.idaho.gov)>  
**Sent:** Wednesday, August 20, 2025 4:17 PM  
**To:** Lauren Rasmussen <[Lauren.Rasmussen@meadhunt.com](mailto:Lauren.Rasmussen@meadhunt.com)>  
**Subject:** RE: Friedman Memorial Airport - Replacement Tower Project

Hi Lauren,

For federally endangered species, we recommend using the federal IPAC tool: <https://ipac.ecosphere.fws.gov/>

A list of all SGCN species in Blaine County may not be necessary for your project. If it is necessary, you can submit a data request at <https://idfg.idaho.gov/data/request>. As described on the web page, there is a fee associated with data requests.

---

**From:** Lauren Rasmussen <[Lauren.Rasmussen@meadhunt.com](mailto:Lauren.Rasmussen@meadhunt.com)>  
**Sent:** Wednesday, August 20, 2025 3:09 PM  
**To:** Dawson,Bradley <[bradley.dawson@idfg.idaho.gov](mailto:bradley.dawson@idfg.idaho.gov)>  
**Subject:** Friedman Memorial Airport - Replacement Tower Project

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Hi Bradley,

Thanks again for your response on the revised GA project.

Contacting you about another project we are working on at SUN. We are preparing a Programmatic EA (under FAA's Tiered EA for the Air Traffic Control Tower Replacement Program). I'm trying to access the IDFG species catalog to get the list of state listed species in Blaine County, but I'm not finding a way to filter by county. I'm looking at this site - <https://idfg.idaho.gov/species/taxa/explore?name=&category=All&idapa=All>. Am I in the right place and am I missing something obvious? I apologize if this is a silly question!

Thanks in advance for any guidance.

Lauren



**Lauren Rasmussen, AICP** (She, Her, Hers)  
Senior Planner | Aviation  
Direct: 303-729-3768 | [Transfer Files](#)  
**Mead&Hunt**  
[LinkedIn](#) | [Facebook](#) | [Instagram](#) | [My LinkedIn](#)

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# Appendix C – SHPO Letter and Concurrence



U. S. Department  
of Transportation

**Federal Aviation  
Administration**

October 31, 2025

Ashley Molloy  
Historic Preservation Review Officer  
The Idaho State Historic Preservation Office  
210 Main Street  
Boise, Idaho 83702

Helena Airports District Office  
2800 Skyway Drive, Suite E2  
Helena, MT 59602

Subject: Determination of Effect due to Proposed Air Traffic Control Tower (ATCT)  
Replacement and Relocation at the Friedman Memorial Airport (SUN) in Hailey, Idaho  
EAXX-021-12-ARP-1761226912

Dear Ms. Molloy:

The Federal Aviation Administration (FAA) in conjunction with the Friedman Memorial Airport Authority (FMAA or Sponsor) is proposing to replace the existing Airport Traffic Control Tower (ATCT) at the Friedman Memorial Airport (SUN or Airport) in Hailey, Idaho. The FAA is the lead federal agency and is responsible for ensuring compliance with the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA has initiated preparation of an Environmental Assessment (EA) to meet its NEPA obligations and intends to complete Section 106 in conjunction with the NEPA process.

The existing ATCT was constructed circa 1985 on the east side of the Airport and is within the Runway Object Free Area (ROFA), which is a safety area surrounding the runway that must be clear of obstructions such as buildings. In addition, the existing SUN ATCT does not meet current FAA siting criteria, cannot be upgraded to meet the latest air traffic control technologies, does not meet personnel space requirements, does not meet modern ADA requirements, lacks modern amenities, and has physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation, plumbing). The proposed replacement ATCT would be located on the west side of the Airport and will meet all applicable FAA requirements and design standards. The new tower will be 84 feet tall to improve visibility, which is 52 feet 6 inches taller than the existing ATCT.

The Area of Potential Effects (APE) was defined to include the geographic area or areas in which project activities may directly or indirectly cause alterations in the character or use of historic

properties and is shown in Figure 1. Effects considered include construction, ground disturbance or modification of a historic property, or its viewshed, noise, vibration, lighting, and increased traffic. Although the new ATCT will be taller, the increase in height is not enough to necessitate a larger APE.

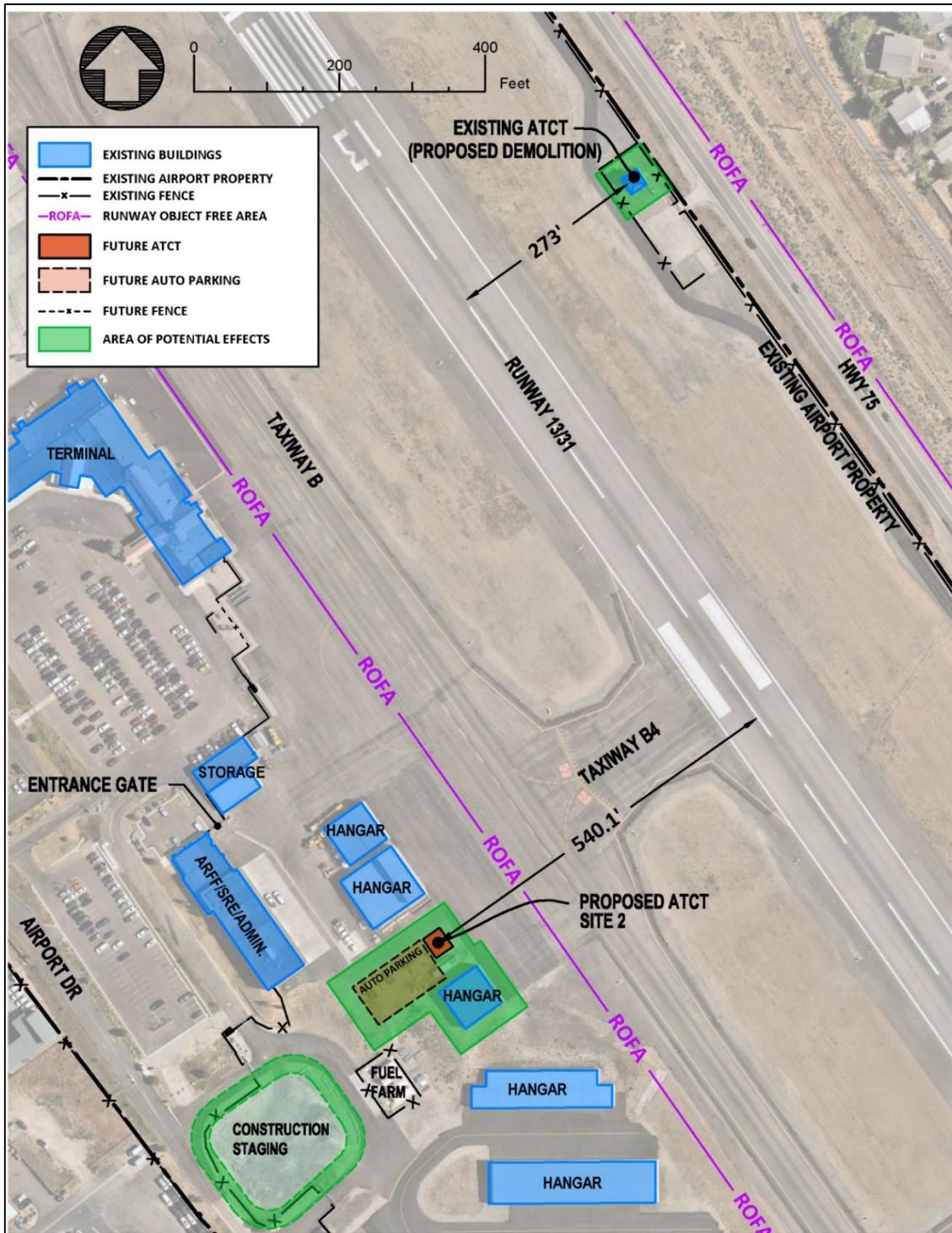


Figure 1: Proposed APE.

Site searches of the Idaho Cultural Resources Information System (ICRIS) and the National Register of Historic Places (National Register) Database indicated there are no historical or archaeological resources within the APE. The nearest determined eligible resource is SH-75 (10LN817), which is approximately 30 feet east of the proposed western project area (where demolition of the existing ATCT would occur).

The existing ATCT is less than 50 years old. In 2017 it was determined to be not eligible for listing in the National Register by FAA with Idaho State Historic Preservation Office (SHPO) concurrence on May 1, 2018. Additional Airport resources that were determined not eligible for NRHP-listing at this time include the circa 1985 hangars that flank the location of the proposed ATCT, and Runway 13-31.

The following is a summary of National Register-eligible resources that are within or adjacent to the Airport property, but outside and not immediately adjacent to the APE (see **Figure 2**). In 2022 the Airport acquired 386 acres at the southern end of the Airport, which include the following NRHP-eligible resources:

- Halfway Ranch/Eccles Flying Hat Ranch Historic District (13-16207) (west of SH-75) at the nearest point, is 0.38 miles southwest of the APE. This portion of the historic district consists of open fields, and the nearest building within the district is 1.2 miles south/southeast of the APE.
- Halfway Ranch /Eccles Flying Hat Ranch Barn (previously recorded as a part of the SH-75 EIS) is 1.2 miles south/southeast of the APE.
- Cove Canal (10BN1126) is 0.5 miles south of the APE.
- Rockwell-White Power Plant Canal (10BN1191) is 1.24 miles south of the APE.

All of these buildings and structures are outside of the APE and between 0.5 miles and 1.24 miles south/southwest of the APE. An ATCT currently exists at the Airport and its replacement, although taller to meet current FAA design standards and enhance the safety of aircraft operations at the Airport, would have no effect these resources. The replacement ATCT would be located within a grouping of existing hangars, and given the size and scale of the tower and the distance to historic resources, this change would not significantly alter existing site lines of airport development. . Given the size and scale of the historic district and canals, and the distance of the APE to each eligible resource, the project activities do not diminish the associative and historic characteristics that qualify them for National Register-listing.

Further, the linear resource SH-75 is determined eligible for NRHP listing under Criterion A in Blaine County. While SH-75 runs along the east side of the Airport, it is outside of and not immediately adjacent to (30 feet west of) the APE. The removal of the existing ATCT will not diminish any of the qualities or historic characteristic for which the road derives National Register significance.

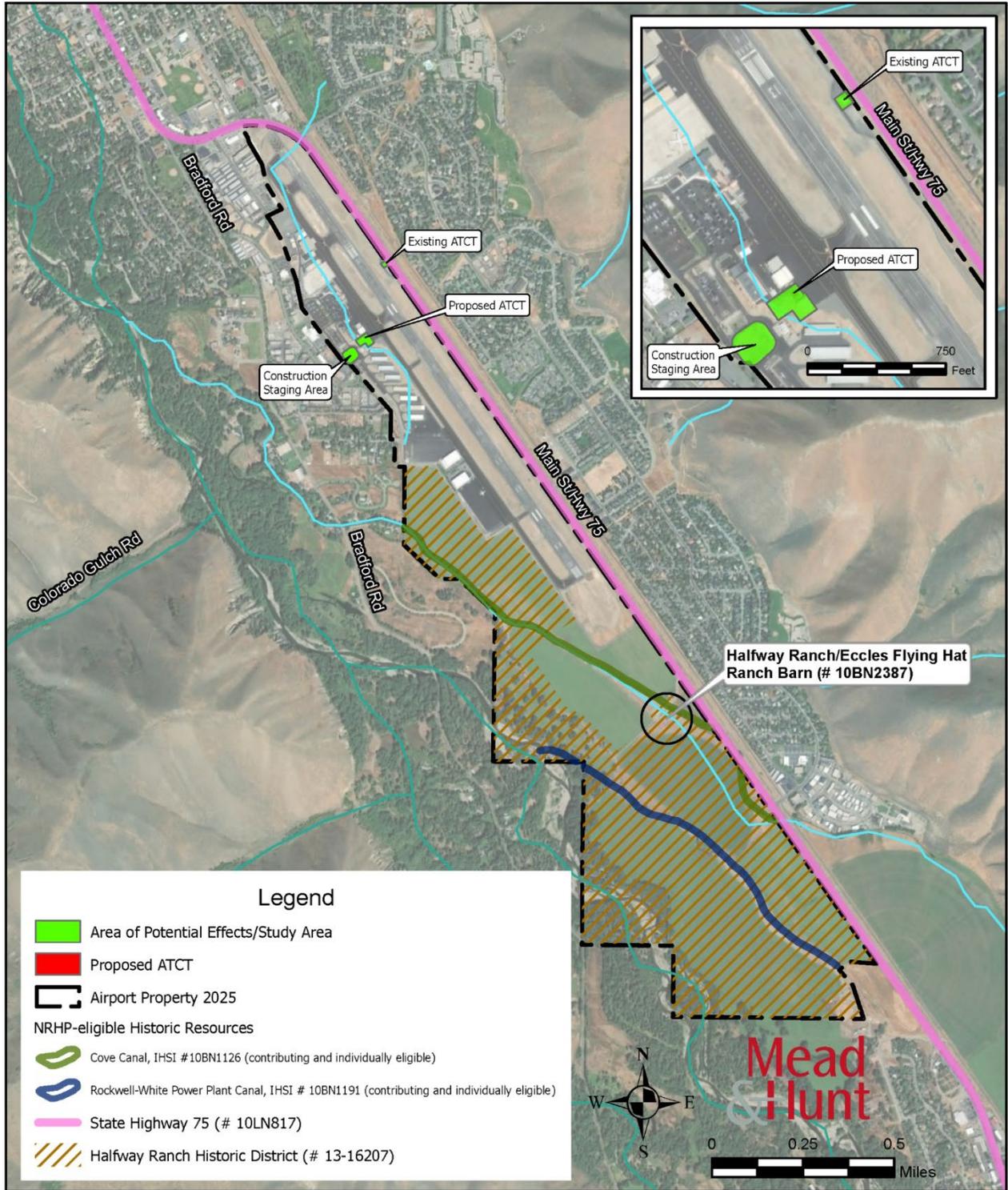


Figure 2: Aerial image showing the proximity of National Register-eligible properties to the Undertaking.

The FAA has determined that there are no historic resources within the APE, and it recommends a determination of *"no adverse effect"* on resources that are determined eligible for the National Register that are on or adjacent to the Airport, but outside the APE.

Please review this information and provide your concurrence. If more information is required, please contact me at [heidy.s.bruner@faa.gov](mailto:heidy.s.bruner@faa.gov). I will be pleased to assist you.

Sincerely,

Heidy Bruner  
Environmental Protection Specialist

cc (via e-mail): Friedman Memorial Airport  
Mead & Hunt

# Appendix D – SUN Siting Report

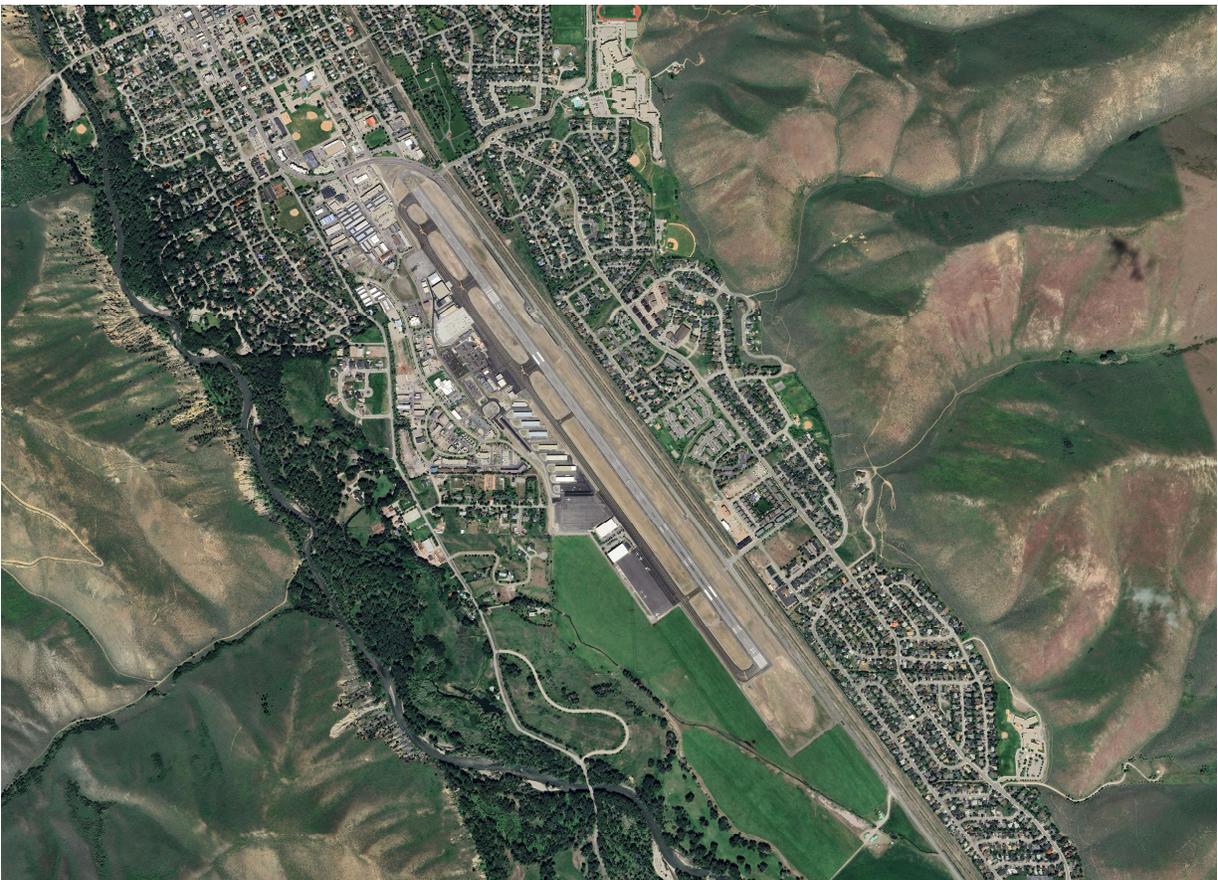


Federal Aviation  
Administration

# Friedman Memorial Airport (KSUN)

## Hailey, Idaho

### Airport Traffic Control Tower Siting Report

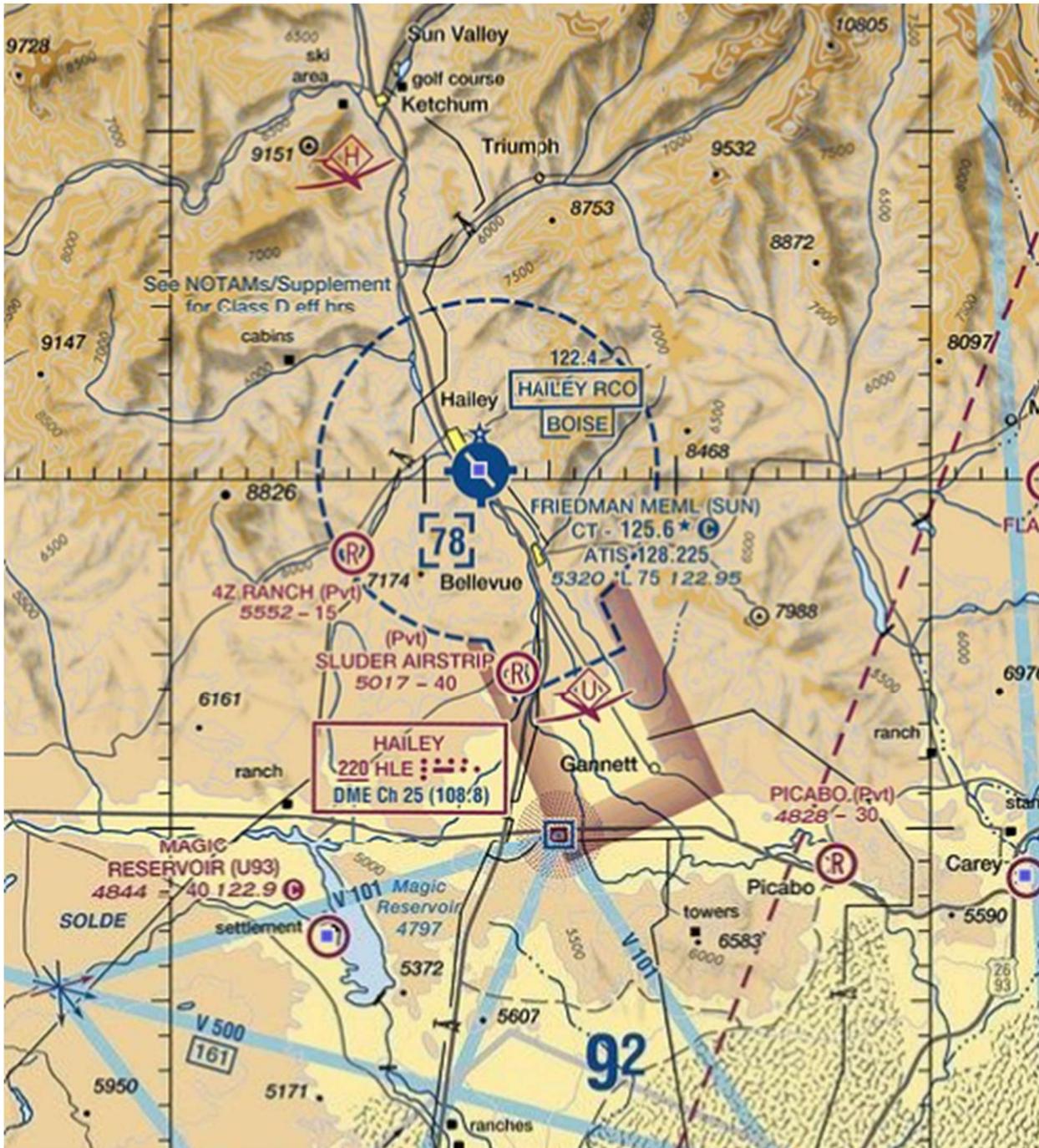


Developed by: William E. Payne

Effective Date: October 29, 2025

## EXECUTIVE SUMMARY

The Friedman Memorial Airport (SUN) is located in a mountain valley bounded on the east by Highway 75, on the west by mountainous terrain with rising terrain to the north and an open valley to the south. The airport has a single Runway 13/31 with a full-length parallel taxiway along the west side.



Due to the airport's location and challenging geography, most operations are constrained to one-way-in-one-way-out with landing to the north on Runway 31 and takeoffs to the south on Runway 13.

The existing Airport Traffic Control Tower (ATCT) is approximately 40 years old and does not meet the siting requirements of FAA Order 6480.4 or current building or life safety codes and has reached the end of its useful life. The ATCT is within the runway object free area (ROFA) and the airport is operating under a Modification of Standard (MOS 3) until the existing tower can be replaced. The cab eye height of the existing ATCT is 28'± Above Ground Level (AGL) (5,327.56± Above Mean Sea Level [AMSL]) with a floor area of 144± square feet (sq. ft.).

The Friedman Memorial Airport ATCT is a sponsor owned Level 1 Federal Contract Tower.

This siting report provides a discussion of the siting process, evaluation criteria for the new tower, an overview of all potential sites considered, a detailed evaluation of the primary site options, conclusions and recommendations.

The cost estimates and building sizes presented in this report are for planning and site selection purposes only.

The proposed action is to identify and reserve a location on the airport for replacement of the ATCT. Representatives from the Federal Aviation Administration (FAA) and the Friedman Memorial Airport Authority met virtually via the Virtual Immersive Siting Tower Assessment (VISTA) process on April 2–3, 2024, to participate in ATCT siting activities. There were additional meetings with the airport and VISTA team to evaluate a possible new location at the request of the Helena Airports District Office (ADO). The team followed the VISTA Memo, dated October 16, 2023, to determine viable/preferred ATCT sites for a potential new ATCT.

### **Recommended Action/Location**

The recommended location is Site 2. The tower coordinates are 43° 30' 17.5" N, 114° 17' 56.75" W and the cab floor height is 66 feet AGL (5,368 feet AMSL). The proposed top of tower (top of air terminals) height is 101 feet AGL (5,403 feet AMSL) with a ground elevation at Site 2 of 5,302 feet AMSL. This is the shortest possible ATCT that meets all siting criteria (see Appendix F) and is deemed safe under the Air Traffic Organization (ATO) Safety Management System (SMS) (see Appendix E). The proposed tower provides unobstructed views of all controlled airport movement areas and maximum visibility of all airborne traffic.

The Helena ADO requested that a site located at 43° 30' 16.66" N, 114° 17' 57.86" W be evaluated to account for a possible future relocation of Runway 13/31 to the west. A preliminary evaluation of this site was made by VISTA and the siting team. This site was located approximately 650' west of the center line of the existing Runway 13/31 and 120'± west southwest of Site 2, the preferred site. As relocation of the runway to the west would require removal of a significant number of existing hangars including the Fixed Base Operator (FBO), and the height of the ATCT would be in excess of 100' AGL (significantly increasing the cost) it was decided that this site was non-viable. The ADO agreed to accept the preferred Site 2 instead of this new site (see Appendix B).

The tower will have a 6-sided, 450 square-foot cab with mullions and slat-wall consoles. The proposed tower will facilitate a safe operating environment for aeronautical activity at SUN well into the future and will be built to resist seismic events. The recommended site provides the best available location for visibility of airport traffic control.

## **Impacts**

The Safety Risk Management (SRM) Panel (see Appendix E) conducted on Site 2 did not identify any hazards. The only impact noted for Site 2 is penetration of the Part 77 transitional surface (see Appendix H). The ATCT will be lighted in accordance with Advisory Circular 70/7460-1M, “*Obstruction Marking and Lighting.*”

## **APPROVAL AUTHORITIES**

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**Director of Air Traffic Services, Western Service Area**

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**Director of Technical Operations, Western Service Area**

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**Director of Facilities and Engineering Services, FAA Headquarters**

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**Appendix B - ADO Concurrence E-mail**

**Appendix C – ATCT Location, Panoramic View and Screen Shots**

**Appendix D – Cab Layout and Airport Layout Plan (ALP)**

**Appendix E – Safety Risk Management Document**

**Appendix F – Human Factors Analysis**

**Appendix G - Obstruction Evaluation/Airport Airspace Analysis (OE/AAA)**

**Appendix H - Meeting Minutes**

**Appendix I - Tech Ops Preliminary Report (TOPR)**

**Appendix J - Additional Sites Evaluated**

## 1.0 PREFERRED SITES

Four potential sites were identified for consideration: Site 1, Site 2, Site 3 and Site 3A. After Evaluation only Site 1 and 2 were considered viable (see Figure 1.) Due to the physical constraints, these four are located on the west side of the runway-taxiway. All sites were evaluated against the required siting criteria. Visibility and impacts were assessed and documented to determine which sites were viable sites. The following preferred sites were selected based on team discussion and inputs on the advantages and disadvantages of each site. Site 1 and Site 2 were determined to be viable. Site 3 was determined to be non-viable due to proximity to a public road, cost and potential community environmental impact due to structure height. Site 3A was determined to be non-viable because of its location in a tiedown area and adjacent to a fuel farm. Site 2 was determined to be the recommended site. Due to the constrained nature of the airport, all four sites were determined to have less than 1 acre available for the ATCT site.

### 1.1 Preferred Sites Aerial View

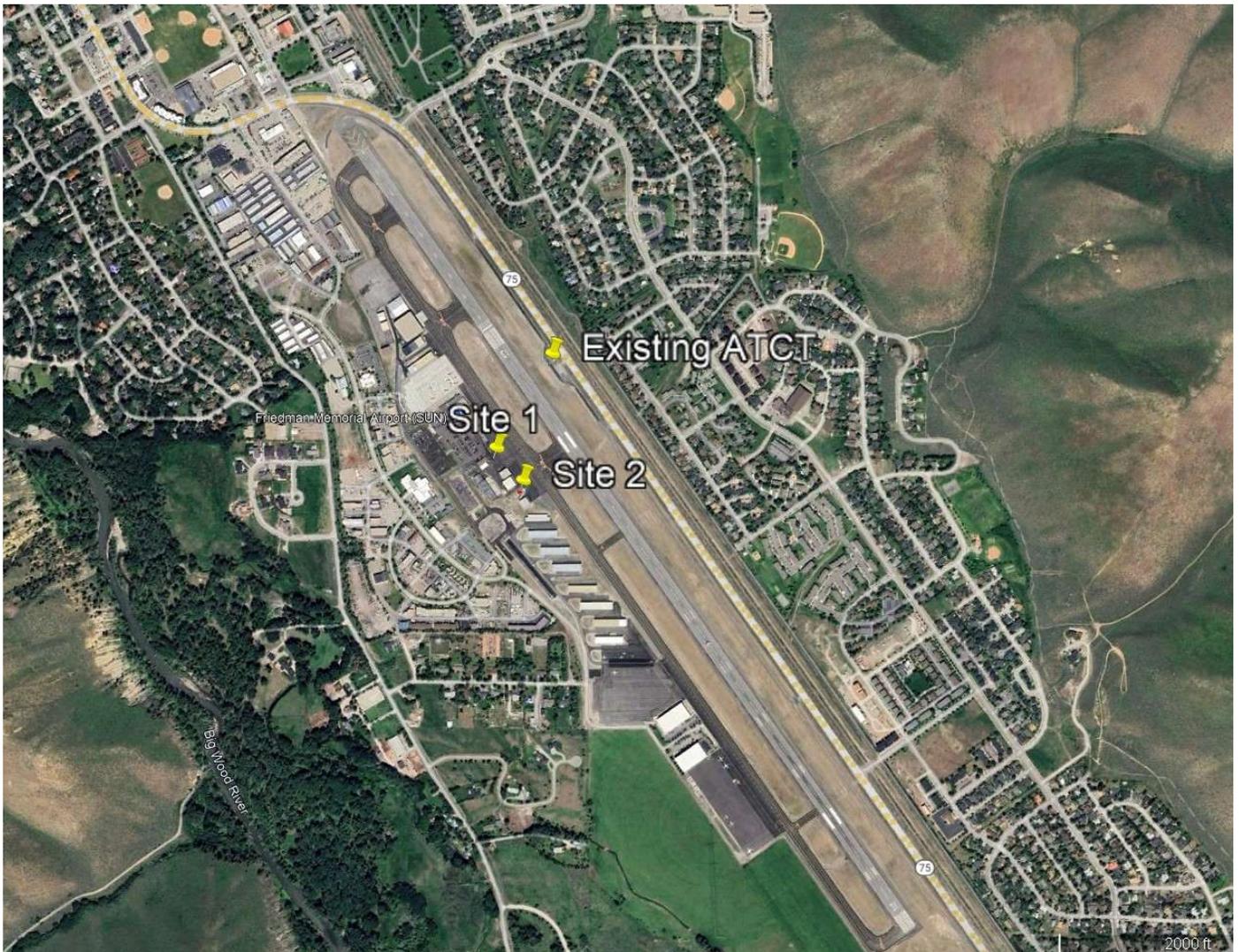


Figure 1. Preferred Sites Aerial View

## 1.2 Site Comparison Chart

Item Description	Site 1	Site 2				
Recommended Site:	Alternate	<b>Recommended</b>				
Latitude	43°30'20.19" N	43°30'17.50"N				
Longitude	114°17'59.33" W	114°17'56.75"W				
Estimated Ground Level (AMSL)	5302'	5302'				
Cab Floor Level (AGL)	76'	66'				
Cab Floor Level (AMSL)	5378	5368				
Eye-Level (AGL)	81'	71'				
Eye-Level (AMSL)	5353'	5373'				
Top of Tower (AGL)*	105'	101'				
Top of Tower (AMSL)*	5413'	5403'				
TERPS No Effect Height (NEH)	797' AGL	778' AGL				
Maximum Distance (to farthest point on all runways and taxi ways)	4998'	4694'				
2-Point Lateral Discrimination (Deg) (Pass/Fail)	Pass (2.16°)	Pass (2.23°)				
Object Discrimination (Pass/Fail) Front View (Minivan)	Pass	Pass				
Line of Sight Angle of Incidence	1.39° (>0.8°)	1.37° (>0.8°)				
ATCT Orientation Direction	East	East				
Cab Size (sq. ft.)	450 sq. ft.	450 sq. ft.				
Columns/Mullions	Mullions	Mullions				
Console Type (traditional, slat-wall)	Slat-Wall	Slat-Wall				
Land Area	<1 Ac.	<1 Ac				
Access to ATCT Site (Yes or No)	Yes	Yes				
Tech Ops Preliminary Review Issues	None	None				
TERPS Impacts	None	None				
14 CFR Part 77 Impacts	Yes	Yes				
Environmental Issues	TBD	TBD				
ATCT Potential Impacts to Future & Existing Nav aids	None	None				
Comparative Cost Estimate** (\$140K per vertical foot)	\$12,320,000	\$11,760,000				
Safety Assessment Initial Risk Ranking	L	M	H	L	M	H
	NA	NA	NA	0	0	0
Safety Assessment Predicted Residual Risk Ranking	L	M	H	L	M	H
	NA	NA	NA	0	0	0

**Table 1**

\* Air Terminals are used as Top of Tower.

\*\* The top of parapet is height used to determine structure cost estimate. The comparative cost estimate is for budgetary purposes only and is based on a generic ATCT design. It is assumed that utilities are within 100' of the ATCT.

## 1.3 Site 1

### 1.3.1 Description

Site 1 is within the Airport Operations Area (AOA), was identified as a viable site for the replacement ATCT and is located 525'± W of Runway 13/31 center line (see Figure 2), 879'± SW of the current ATCT, 235'± S of the terminal building, 60'± NE of the Snow Removal Equipment Building slated to be removed, and 115'± NW of a hangar also slated to be removed. Site 1 is identified as a possible site for the replacement ATCT on the Airport Layout Plan (ALP) and provides an unobstructed view of the airport movement area with a Line of Site Angle of Incidence of 1.39°.

### 1.3.2 Site Reference Data

Site 1 is located at 43°30'20.10"N Latitude, 114°17'59.33"W Longitude and has a cab floor height of 76 feet AGL (5378 feet AMSL), a top of tower height of 105 feet AGL (5413 feet AMSL) and penetrates the Part 77 transitional surface by 68±'. Refer to Table 1, Site Comparison Chart, for additional site reference data.

### 1.3.3 Siting Criteria Evaluation

#### A. Terminal Instrument Procedures (TERPS)

The ATCT at Site 1 has no known TERPS impacts.

#### B. 14 CFR Part 77, Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) requirements

The ATCT located at Site 1 penetrates the Part 77 Transitional Surface must be lighted in accordance with Advisory Circular 70/7460-1M, "*Obstruction Marking and Lighting.*"

#### C. Impacts to Communications, Navigation and Surveillance Equipment.

Site 1 has no known impact on Communications, Navigation or Surveillance.

#### D. Visibility Performance Requirements.

A visibility siting requirements analysis was conducted using the FAA's human factors tool to address the unobstructed view, object discrimination, and LOS angle of incidence requirements. Site 1 passed all analyses and does not require any additional mitigation strategies.

#### E. Safety Assessment.

A safety assessment was not conducted on Site 1.

#### F. Operational Requirements.

The ATCT orientation, weather, look-down angle, look-up angle, look across angle, access, and visibility of non-movement areas were taken into consideration during the siting process with no hazards found. The cab was configured with a combination of columns and mullions

to minimize LOS impacts. The stairwell is located on the south side of the cab opposite Runway 13/31 with the entrance just to the right of and behind the Supervisor's desk.

Location and orientation of the Site 1 ATCT cab is depicted in Figure 1 and Figure 2.

1. ATCT Orientation: Northeast.
2. Weather: No issues were identified.
3. Look-Down Angle: The look-down angle is adequate to see all movement areas of the airport.
4. Look-Up Angle: The look-up LOS in the cab is adequate to see all necessary areas.
5. Look Across LOS: The look across LOS in the cab is adequate to see all necessary areas.
6. Cab Column and Mullion Configuration: Columns are the primary structural element supporting the cab roof with intermediate mullions as necessary.
7. Construction: Construction of Site 1 will have minimal effect on movement area traffic and will not impact visibility from the existing ATCT.
8. Access: Access to Site 1 would be via a security-controlled gate onto the AOA.
9. Non-Movement Areas: No issues were identified with non-movement areas.
10. Cab Size Evaluation: A space planning exercise was conducted in a virtual 450 sq. ft. cab to identify any space constraints on the proposed control cab. No issues were identified.
11. Rotating Beacon: The rotating beacon will remain in its present location.

#### G. Economic Considerations

Cost estimate is based on \$140,000 per vertical foot. This estimate is reflective of construction costs in remote mountainous areas. Refer to Table 1 for comparative cost for Site 1.

#### H. Environmental

No Phase 1 Environmental Site Analysis was done for Site 1.

#### I. Servicing Security Element

Physical security protective measures shall be implemented based on a Facility Security Level (FSL) 1A, per FAA Order 1600.69D, "*FAA Facility Security Management Program.*"

## 1.4 Site 2 – Recommended

### 1.4.1 Description

Site 2 is within the AOA and was identified as the Recommended site by the Airport to replace the current ATCT. It is located 550'± W of Runway 13/31 center line (See Figure 3), 1085'± SW of the current ATCT, 60'± SE of a snow removal and maintenance building slated for removal and replacement, and 55'± NW of a hangar. Site 2 provides an unobstructed view of the airport movement area with a Line-of-Sight Angle of Incidence of 1.35°.

### 1.4.2 Site Reference Data

Site 2 is located at 43°30'17.50"N Latitude, 114°17'56.75"W Longitude and has a cab floor height of 66 feet AGL (5368 feet AMSL), a top of tower height of 101 feet AGL (5403 feet AMSL) and penetrates the Part 77 Transitional surface by 59'±. Refer to Table 1, Site Comparison Chart, for additional site reference data.

### 1.4.3 Siting Criteria Evaluation

#### A. Terminal Instrument Procedures (TERPS).

The ATCT at Site 2 has no known TERPS impacts. Refer to Appendix H for additional information.

#### B. 14 CFR Part 77, Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) Requirements

The ATCT located at Site 2 penetrates the Part 77 Transitional Surface and must be lighted in accordance with Advisory Circular 70/7460-1M, "Obstruction Marking and Lighting." Refer to Appendix H for additional information.

#### C. Impacts to Communications, Navigation and Surveillance Equipment.

An ATCT located at Site 2 has no known impact on Communications, Navigation or Surveillance. See Appendices H and J for additional information.

#### D. Visibility Performance Requirements.

A visibility siting requirements analysis was conducted using the FAA's human factors tool to address the unobstructed view, object discrimination, and LOS angle of incidence requirements. Site 2 passed all analyses and does not require any additional mitigation strategies. Refer to Appendix F for additional information.

#### E. Safety Assessment.

The SRM Panel conducted on Site 2 did not identify any hazards. The full report is presented in Appendix E.

## F. Operational Requirements.

The ATCT orientation, weather, look-down angle, look-up angle, look across angle, access, and visibility of non-movement areas were taken into consideration during the siting process with no hazards found. The cab was configured with a combination of columns and mullions to minimize LOS impacts. The stairwell is located on the south side of the cab opposite Runway 13/31 with the entrance just to the right of and behind the Supervisor's desk.

Location and orientation of the Site 2 ATCT cab is depicted in Figure 1 and Figure 3.

1. ATCT Orientation: Northeast.
2. Weather: No issues were identified.
3. Look-Down Angle: The look-down angle is adequate to see all movement areas of the airport.
4. Look-Up Angle: The look-up LOS in the cab is adequate to see all necessary areas.
5. Look Across LOS: The look across LOS in the cab is adequate to see all necessary areas.
6. Cab Column and Mullion Configuration: Columns are the primary structural element supporting the cab roof with intermediate mullions as necessary.
7. Construction: Construction of Site 2 will have minimal effect on movement area traffic and will not impact visibility from the existing ATCT.
8. Access to Site 2 will be via a security-controlled gate onto the AOA.
9. Non-Movement Areas: No issues were identified with non-movement areas (see Appendix C).
10. Cab Size Evaluation: A space planning exercise was conducted in a virtual 450 sq. ft. cab to identify any space constraints on the proposed control cab. No issues were identified.
11. Rotating Beacon: The rotating beacon will remain in its present location subject to visual impact on the new ATCT. If impacts are present, mitigations will be implemented to ensure no diminution to controller operations.

## G. Economic Considerations

Cost estimate is based on \$140,000 per vertical foot. This per vertical foot cost is based on construction in remote mountainous areas. Refer to Table 1 for comparative cost for Site 2.

## H. Environmental

A Phase 1 Environmental Site Analysis was conducted on Site 2. Refer to Appendix G for additional information.

## I. Servicing Security Element

Physical security protective measures shall be implemented based on a FSL 1A, per FAA Order 1600.69D, “*FAA Security Management Program.*”

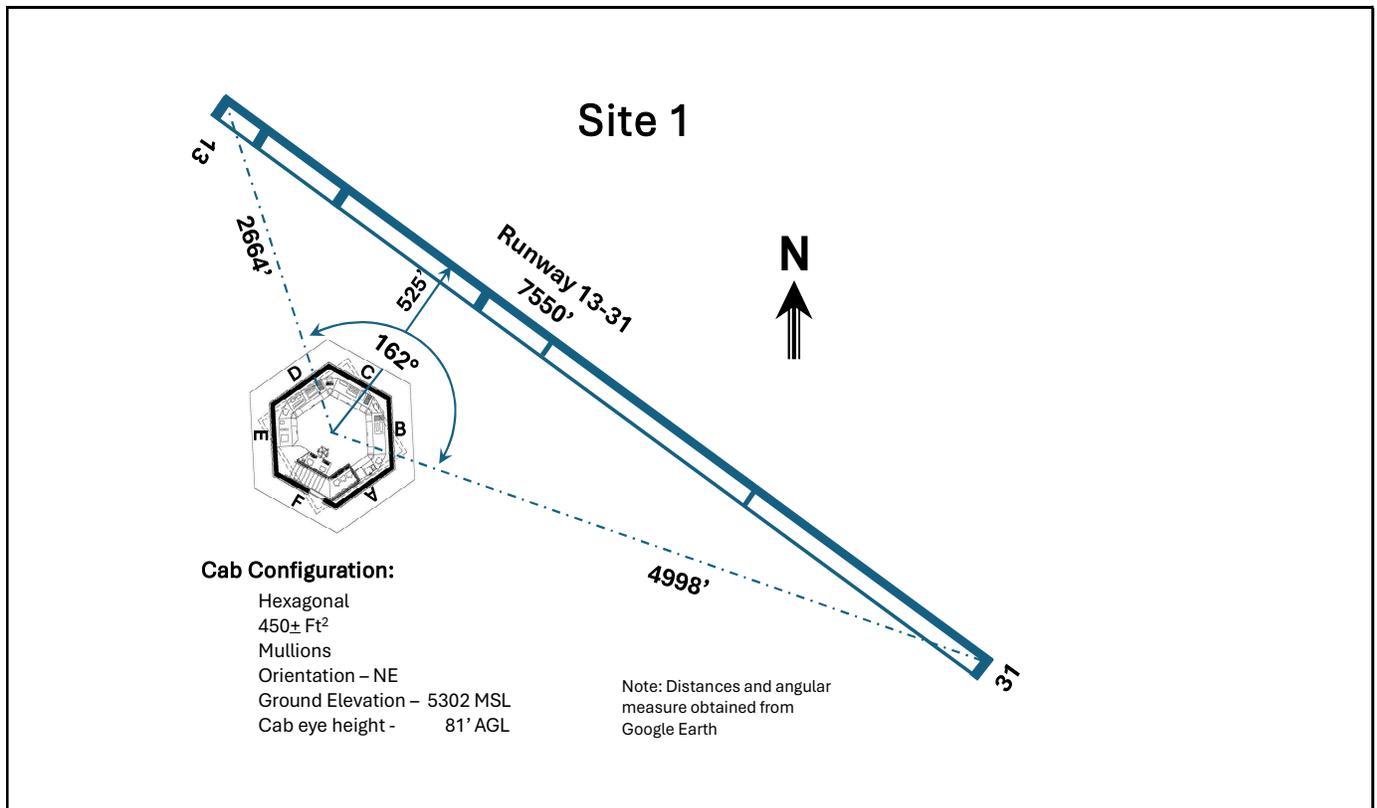
## 2.0 FINAL SITE RECOMMENDATION

The final recommended site selection for SUN based on the siting criteria is Site 2. Site 2 provides the controllers with an unobstructed view of the airport movement area and the local airspace. Site 2 exceeds the Line-of-Sight requirement 0.8°. The local and ground/flight data positions face Runway 13/31 directly with the Supervisor position located on the opposite side of ATCT cab. Utilities including water, sewer, power, natural gas, communications, etc. are available to the site. Site 2 is located inside the AOA and therefore does not require additional fencing. Site 2 is the most economical location to construct of the sites evaluated. The Airport sponsor has agreed to provide sufficient land to construct the ATCT. No airspace impacts, operational hazards or environmental impacts were identified during the evaluation.

## 3.0 CAB SIZE AND ORIENTATION

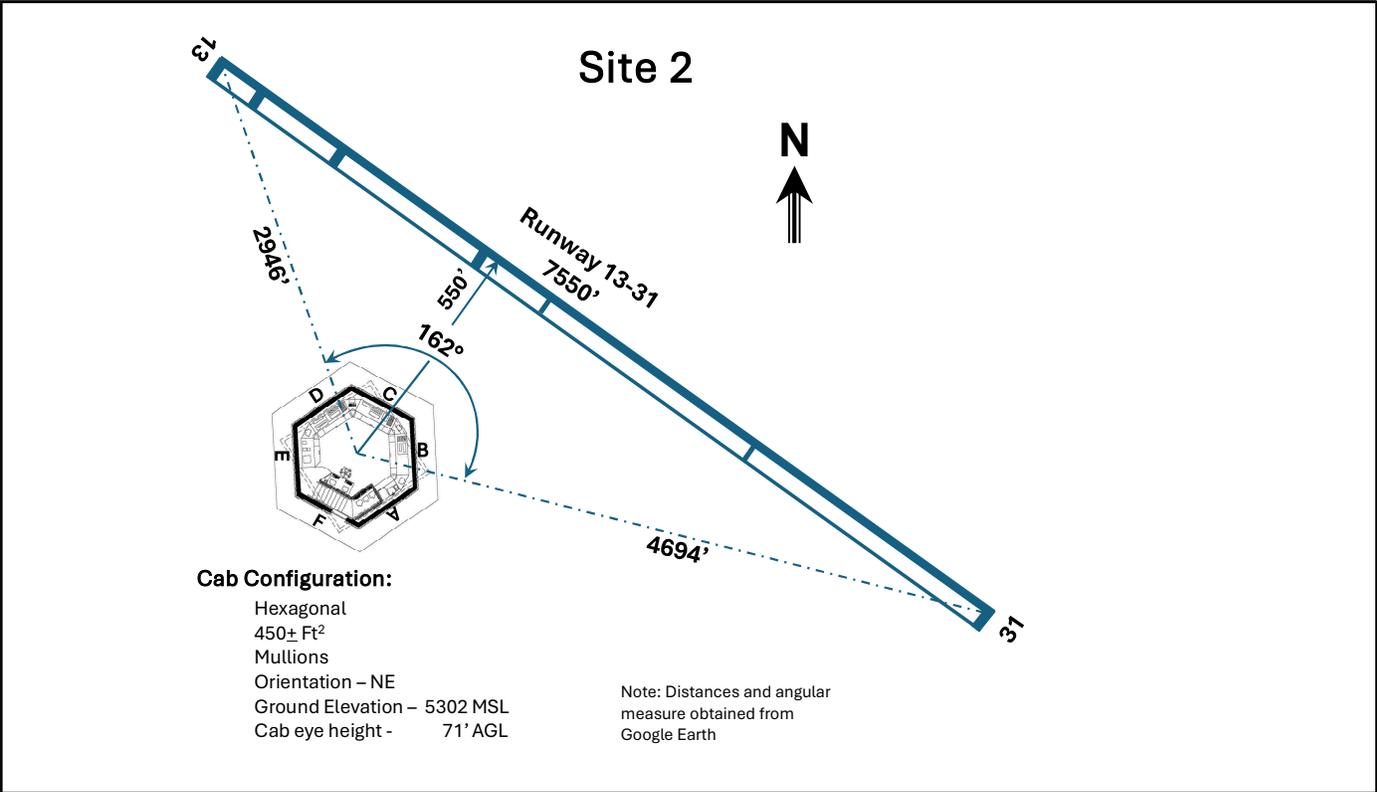
The cab will be a 6-sided 450 sq. ft. cab facing northeast. The tower has three authorized positions in the cab: Local Control, Ground Control/Flight Data and Supervisor.

### 3.1 Site 1 Cab Orientation - Alternate Site



**Figure 2**

### 3.2 Site 2 Cab Orientation – Recommended Site



**Figure 3**

#### **4.0 SUPPLEMENTAL INFORMATION**

Appendix A – Airport Concurrence Letter

Appendix B – ADO Concurrence E-mail

Appendix C – ATCT Location, Panoramic View and Screen Shots

Appendix D – Cab Layout and Airport Layout Plan (ALP)

Appendix E – Safety Risk Management Document

Appendix F – Human Factors Analysis

Appendix G – Obstruction Evaluation/Airport Airspace Analysis (OE/AAA)

Appendix H – Meeting Minutes

Appendix I – Tech Ops Preliminary Report (TOPR)

Appendix J – Additional Sites Evaluated

**See Attached Appendices**

# Appendix E – Public Involvement

To be updated for Final Draft EA