

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**

HELENA AIRPORTS DISTRICT OFFICE

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

AIRPORT NAME AND LOCATION:

Friedman Memorial Airport
Hailey, Idaho

INTRODUCTION:

This document presents the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) for the acquisition of property, removal of trees, and extension of the Airport perimeter fence to be implemented beginning in 2019 at the Friedman Memorial Airport (SUN). This FONSI is based on the information and analysis contained in the Final Environmental Assessment (FEA) dated May 2019 and attached hereto. The FEA has been prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA) and the President's Council on Environmental Quality (CEQ) Regulations Title 40 CFR §§ 1500-1508, and in accordance with FAA Order 1050.1F *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. The FEA documents the evaluation of the environmental impacts of actions proposed by the Airport Sponsor.

PROPOSED ACTION:

The Friedman Memorial Airport Authority (FMAA or Airport Sponsor) proposes the following improvements at the Friedman Memorial Airport. Chapter 1 and Figure 1-7 in the attached FEA provides a description and graphic depiction of the project, which includes the following elements:

- Acquisition of 64.6 acres of property at the southern end of Runway 31.
- Removal of up to 200 trees (including obstruction lights currently placed in the trees) on the south end of the runway. Once the obstructions have been removed, the FAA would amend the departure procedure for Runway 13 to remove the takeoff notes related to those obstructions.
- Extending the Airport perimeter fence to provide fencing for the full length of the Runway Object Free Area (ROFA) at the southern end of Runway 31.

PROPOSED FEDERAL ACTION:

The requested Federal actions and approvals necessary for this project to proceed include the following:

- Unconditional approval of the Proposed Action as shown on the Airport Layout Plan.
- A determination that the environmental analysis prerequisites associated with any future Airport Improvement Program (AIP) funding application concerning the Proposed Action have been fulfilled pursuant to 49 USC 47101.
- Once obstructions have been removed, an amendment to the departure procedure for Runway 13 to remove the takeoff notes related to those obstructions.

PURPOSE AND NEED:

The purpose for the proposed improvements at SUN is to improve safety by addressing deficiencies to bring safety areas at the south end of the Airport into compliance with FAA standards and recommendations and by removing obstructions to the airspace south of the Airport. Modification of Standards (MOSs) that are already approved will remain in place after the Proposed Action is implemented, as these relate to non-standard conditions that will not be addressed under the Proposed Action.

The Proposed Action is needed to address deficiencies identified in the 2018 Master Plan Update (MPU) related to the Runway Safety Area (RSA), Runway Object Free Area (ROFA), and Runway Protection Zone (RPZ), and obstructions in the Part 77 Approach Surface and AC 150/5300-13A Departure Surface. Control of the full 1,000-foot length of the RSA, relocation of the Airport's perimeter fence, and continued used of MOS 3 (see Table 1-1 of the FEA) are necessary for the Airport to cease the use of declared distances for landings on Runway 13 (landings from the north) and for aborted takeoffs from Runway 13 (departure to the south). The Proposed Action will improve safety for aircraft, people, and property on the ground, and will acquire additional rights and property to maintain clear airspace in accordance with FAA AC 150/5300-13A and FAA Order 5100.38D. The Purpose and Need is presented fully in Chapter 2 of the FEA.

ALTERNATIVES CONSIDERED:

Chapter 3 of the FEA presents the alternatives analysis. The FEA identified and evaluated reasonable alternatives that may accomplish the objectives of the Proposed Action in accordance with NEPA, FAA Orders 1050.1F and 5050.4B, and FAA design standards. The following sections provide a summary of the alternatives considered in the FEA, which were either eliminated from further study or carried forward for analysis in the FEA.

Alternatives Examined but Eliminated from Detailed Study:

Alternative 2

Alternative 2, shown in Figure 3-2 of the FEA, is the minimum acreage which would be required to gain perpetual control of the RSA, full length of the ROFA, RPZ, and clear the documented obstructions, with two exceptions. The land acquisition in this alternative encompasses almost the entire RPZ and ROFA,

except for the areas overlapping Highway 75 and a small segment of land in the southwestern corner of the RPZ.

Alternative 2 was ultimately not carried forward for further analysis due to its failure to address the Purpose and Need and the potential adverse effect to the Historic District (described below in Environmental Consequences) linked to the farmstead.

Alternative 3

Alternative 3, shown in Figure 3-3 of the FEA, expands the total area of acquisition toward the southwest compared to Alternative 2. Compared to Alternative 2, Alternative 3 would gain control over 12.7 additional acres for a total of 47 acres. The land acquisition would consist of 41 acres of active pasture, 3.1 acres attributed to the Cove Canal, and 2.9 acres of farmstead. Moreover, the acquisition of the 47 acres includes 4.7 acres in avigation easement and 42.3 acres in fee simple acquisition. Distinctly different than Alternative 2, the Alternative 3 westerly boundary line of the acquisition stems approximately 800' parallel of the extended runway centerline, which aids to clear transitional surfaces.

Alternative 3 was ultimately not carried forward for further analysis due to its failure to address the Purpose and Need and the potential adverse effect to the Historic District (described below in Environmental Consequences) linked to the farmstead.

Alternative 4

Alternative 4, shown in Figure 3-4 of the FEA, expands the total area of acquisition toward the east compared to Alternative 3. Compared to Alternative 3, Alternative 4 would gain control over five additional acres for a total of 52 acres. The land acquisition would consist of 44.3 acres of active pasture, 3.7 acres attributed to the Cove Canal, and 4 acres of farmstead. The easterly boundary of the acquisition extends to include approximately 417 feet of Cove Canal up to the Highway 75 right-of-way and includes all the Halfway Ranch buildings.

Although this alternative met the Purpose and Need, the impacts to the historic farmstead are the greatest with this alternative; therefore, Alternative 4 was eliminated from further consideration due to the potential adverse effect to the Historic District (described below in Environmental Consequences) linked to the farmstead buildings.

Alternative 5

Alternative 5 was developed during discussions with the FMAA Board as they determined Alternatives 2, 3, and 4 did not meet all of the Airport's, FAA's, and landowner's needs. Alternative 5 was created using parts and concepts of Alternatives 2, 3, and 4.

Figure 3-5 of the FEA shows Alternative 5 as approved by the FMAA Board. Alternative 5 expands the total area of acquisition toward the southwest compared to Alternative 4. Compared to Alternative 4, Alternative 5 would gain control over 12.8 additional acres for a total of 64.8 acres. The land acquisition would consist of 59.8 acres of active pasture, 3.7 acres attributed to the Cove Canal, and 1.3 acres of farmstead. The westerly boundary of the acquisition extends approximately 1,250 feet from the runway centerline. Notably, Alternative 5 would include acquisition of the farmhouse for future removal but would avoid the remaining farmstead buildings, namely the equipment shed, historic barn, and irrigation infrastructure.

Alternative 5 was presented to the Board and public at the FMAA board meeting held on September 5, 2017. The Board was unanimously in favor of Alternative 5 becoming the Proposed Action Alternative.

While Alternative 5 meets the Purpose and Need, the potential adverse effect to the Historic District (described below in Environmental Consequences), namely the acquisition of the farmhouse, led to the development of Alternative 6 (described below) and the removal of Alternative 5 from further consideration.

Alternatives Examined in Detail:

Two alternatives were carried forward for analysis in the EA:

Alternative 1 - No Action Alternative

For the No Action Alternative, the Airport would not acquire any land and therefore would not have control of the RSA and the full length of the ROFA at the southern end of the runway. Without the land acquisition, the Airport would be forced to control these surfaces, the RPZ, and approach/departure areas (including maintenance of obstruction lights in the trees) through an easement with the Eccles Flying Hat Ranch. No changes would be made to the Cove Canal or to the Eccles Flying Hat Ranch under this alternative.

Without control of these surfaces and the ability to remove obstructions, the deficiencies at the south end of the Airport identified in the 2018 MPU will remain. Also, under this alternative, without ownership and control over the RSA and full length of the ROFA, the Airport would not be able to move the perimeter fence; and therefore, would have to continue the use of declared distances. Additionally, the landowner of the Eccles Flying Hat Ranch has stated that he is not agreeable to another long-term easement for lighting the trees. If the easement was allowed to expire, the FAA's flight procedures office has advised that the instrument approach procedures for SUN would be noted as unavailable after dark since the obstruction lights in the trees would have to be removed and the trees (obstructions) would remain. This would result in severe restrictions to the operational capability of the airport.

Although the No Action Alternative does not meet the Purpose and Need, CEQ and NEPA regulations require evaluation of a No Action Alternative. When compared with the Proposed Action, the No Action Alternative serves as a reference point.

Alternative 6 (Proposed Action)

During initial environmental evaluation of Alternative 5 and through active discussion with the FAA, State Historic Preservation Office (SHPO), and the Airport, it was determined that the acquisition of the farmhouse proposed in Alternative 5 would be an "adverse effect", as defined by Section 106 of the National Historic Preservation Act (NHPA) and therefore also a Section 4(f) use (see Environmental Consequences below and Section 4.5 of the FEA). Due to this determination and through the Section 4(f) evaluation process, Alternative 6 was developed to minimize the impacts to the historic farmstead. Alternative 6 thereby reduces the total area of acquisition compared to Alternative 5.

Alternative 6 was presented and approved as the Proposed Action as summarized above and described in detail in Chapter 1 of the FEA.

ENVIRONMENTAL CONSEQUENCES:

The FEA, Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*, outlines the potential environmental consequences associated with the No Action Alternative and Proposed Action Alternative.

Below is a brief summary of findings for the primary environmental resource categories. Detailed information for each category can be found in the FEA, Chapter 4, *Affected Environment, Environmental Consequences, and Mitigation*.

Air Quality

Blaine County, including SUN, is within attainment for all National Ambient Air Quality Standards (NAAQS).

The Proposed Action will not result in any aircraft operational changes; therefore, the Proposed Action will have no significant effect on air quality. Best Management Practices (BMPs) would be utilized during construction to limit construction related emissions.

Biological Resources

The Proposed Action will have no effect on federally-listed Canada lynx, North American wolverine, or the yellowbilled cuckoo. In addition, the proposed action will not adversely affect any state sensitive species.

Climate

The Proposed Action will not result in any aircraft operational changes, and therefore, will not result in an increase in greenhouse gas emissions.

Coastal Resources

The Proposed Action will not affect a coastal zone as Idaho does not have a defined Coastal Zone Management Plan (CZMP).

Department of Transportation Section 303 / 4(f)

The property to the south of the Airport, where the acquisition would occur, is a part of a larger Historic District known as the “Eccles Flying Hat Ranch” (also known as the “Halfway Ranch”). The ranch property spans approximately 750 acres, of which approximately 615 acres west of Highway 75 form the historic core of the ranch. Much of the main farmstead of the Historic District lies on the extended centerline of the Airport’s Runway 13/31. A layout of the Historic District and its relation to the Airport is shown in Figure 3-1 of the FEA.

The ranch property on the west side of State Highway 75 is eligible for listing in the National Register of Historic Places (NRHP) as it retains sufficient integrity to communicate its historic associations with the agricultural development of the Wood River Valley. The farmstead, which lies on the extended centerline of Runway 13/31, encompasses several individual resources (e.g. farmhouse, barn, grain bins, animal sheds, utility buildings, canals, a corral, equipment shed, well, and outhouse) dating from 1884 to 2006, of which, seven comprise the main farmstead area. Discussion of the Ranch is provided in Sections 4.5 and 4.8 of the FEA and the Cultural Resources Report that is provided in Appendix C of the FEA.

The Proposed Action will result in no use of recreational resources, State Highway 75, or the NRHP-eligible barn, as none of these resources are within the area of impact. The Proposed Action will not change Airport flight patterns or operations and no constructive use will occur. The FAA determined and

SHPO concurred that the land acquisition, obstruction removal along the Cove Canal, and fence line extension will result in no adverse effect to identified components of the main farmstead area and subsequently no use of these historic resources.

However, the removal of windrow trees surrounding the main farmstead area would constitute an adverse effect to contributing elements of the Historic District under Section 106 for impacting the setting of the farmstead area, which contain contributing elements to the Eccles Flying Hat Ranch.

After careful and thorough consideration, the FAA determined that there are no feasible and prudent alternatives to the use of Section 4(f) resources. As demonstrated in Chapter 3 of the FEA and in the DOT Section 4(f) Evaluation included in Appendix G of the FEA, the Proposed Action includes efforts to minimize impacts to Section 4(f) resources by limiting the acquisition of the Eccles Flying Hat Ranch farmstead resources and by keeping farming operations intact.

Consultations between the FAA and SHPO resulted in the signing of the Memorandum of Agreement (MOA) (included in Appendix G of the FEA), which details conditions to preserve the historic integrity of the Eccles Flying Hat Ranch, including: the installation of a display/panels at the Airport that provide information about the agricultural history of the Wood River Valley and the replanting of low growing/airport compatible shrub species near the farmhouse as mitigation under Section 106.

Farmlands

A Farmland Conversion Impact Form was completed for the Proposed Action to determine the level of impact to Prime Farmland. Based on the current location of the farmland to be converted (off of the end of Runway 31), and the small percentage of the area being converted, among other factors, the site scored 144 points out of 260 points. According to the desk reference to FAA Order 1050.1F *Environmental Impacts: Policies and Procedures*, sites receiving a total score of less than 160 need not be given further consideration for protection and no further evaluation is needed.

Based on the results of the Farmland Conversion Impact Form and consultation with the NRCS, the Proposed Action will have no significant effect on Prime Farmland.

Hazardous Materials, Pollution Prevention and Solid Waste

The Hazardous Materials Evaluation - Phase 1 Report found no evidence of an existing release, past release, or material threat of a release of any hazardous substances or petroleum products, which would qualify as a recognized environmental condition (REC) or an historic recognized environmental condition (HREC). Likewise, the assessment found no evidence of controlled recognized environmental conditions (CRECs), in which hazardous substances or petroleum products were released but allowed to remain in place, subject to implementation of the required controls by the applicable regulatory authority.

The Proposed Action is expected to have no significant effect on hazardous materials, solid waste, or pollution prevention activities.

Historic, Architectural, Archeological and Cultural Resources

The Proposed Action will have no effect on State Highway 75 or the NRHP-eligible barn, as these resources will not be acquired or impacted. The Proposed Action will have no adverse effect on the Cove Canal, as the acquisition will retain use and continued maintenance of the Canal and neither the land acquisition nor removal of trees will markedly diminish its overall historical integrity. The land acquisition will reduce the Eccles Flying Hat Ranch Historic District by approximately 9%, from roughly 750 acres to 685 acres, but the character-defining historic elements and the distinctive characteristics of the settlement period methods of construction during the early 20th century will be retained.

The FAA has determined that the obstruction removal of the windrow of trees will result in an adverse effect to the Eccles Flying Hat Ranch Historic District by diminishing the setting and feeling of the farmstead. An MOA under Section 106 has been established to mitigate the adverse effect (included in Appendix G of the FEA).

Land Use

Under the Proposed Action, the Airport will acquire land currently used for agriculture and pasture. Only 6.5 acres would change from agriculture to Airport use, which is compatible with the City of Hailey and Blaine County zoning regulations. The removal of obstructions and extension of the fence will not change the land use within the area and will prevent encroachment on airspace, consistent with zoning ordinances.

Therefore, the Proposed Action will have no significant effect on land use within the vicinity of the Airport.

Natural Resources and Energy Supplies

There are no known natural resource or energy resource shortages for the Airport. Land acquisition under the Proposed Action is not expected to result in any operational changes at the Airport.

As the Proposed Action does not cause demand to exceed available or future supplies of natural resources and energy supplies, the Proposed Action will have no significant effect on natural resources and energy supplies.

Noise and Compatible Land Use

The Proposed Action will have no significant effect on noise as the project will not result in a change to the DNL 65 db noise contour. No noise sensitive areas are within the contour and there are no noise-incompatible land uses in proximity to the Airport.

Socioeconomic, Environmental Justice and Children's Environmental Health and Safety Risks

The Proposed Action is not likely to cause or create an increase in aircraft operations beyond normal projections. Land use will remain largely the same following acquisition, and project activities, including obstruction removal and the fence line extension, and will not have significant effects on air quality, climate, hazardous materials, noise, and water resources.

The Proposed Action will have no effect on economic activity, employment, income, housing, public services, social conditions, or low income or minority populations in the vicinity of the Airport. Likewise, the Proposed Action will have no effect on the individual or cumulative environmental health of low income and minority populations, or children's environmental health and safety.

Visual Effects

The Proposed Action does not include the installation of new lighting facilities and is not likely to cause or create an increase in aircraft operations at the Airport beyond normal projections that may result in increased light emissions. The removal of six lighted beacons as part of the obstruction removal will slightly decrease light emissions.

Therefore, the Proposed Action will have no effect on light emissions.

Under the Proposed Action, the farmhouse, well, barn, equipment shed, outhouse, and irrigation equipment shed, will not be acquired or removed. Thus, the visual character of these resources will remain intact. However, the removal of trees near the farmhouse will diminish the visual character of the setting of the farmstead.

Therefore, the Proposed Action will have an adverse effect on visual resources and visual character within the project area and general vicinity. A Memorandum of Agreement (MOA) under Section 106 has been established to mitigate the adverse effect (included in Appendix G of the FEA).

Water Resources

Wetlands

Under the Proposed Action, approximately 3.7 acres attributed to the Cove Canal (approximately 2,691 linear feet) will be acquired and maintained for water delivery. Given its location directly off of the end of Runway 13/31, there are no practicable measures to avoid acquiring part of the Cove Canal and the removal of trees that have been identified as obstructions. The removal of up to 200 trees will result in the conversion of Palustrine Forested (PFO) and Palustrine Scrub-Shrub (PSS) wetlands to Palustrine Emergent (PEM) wetlands. The conversion of wetland types does not qualify as a wetland impact as determined by the United States Army Corps of Engineers (USACE) under the Clean Water Act (CWA).

BMPs during construction will prevent and minimize wetland impacts.

The Proposed Action is in accordance with Executive Order 11990 and will result in no net loss to wetlands and will have no adverse effect on wetland resources.

Floodplains

The project area is not located within the floodplain; therefore, the Proposed Action will have no effect on floodplains.

Surface Waters

Under the Proposed Action, water quantity in the Cove Canal will be unaffected. The conversion of PFO and PSS wetlands to PEM wetlands is unlikely to affect water quality over the long term.

With implementation of BMPs during construction to prevent and minimize water quality impacts, the Proposed Action will have no significant effect on surface water resources.

Groundwater

With implementation of BMPs during construction to prevent and minimize spills that could reach groundwater through infiltration, the Proposed Action will have no significant effect on groundwater resources.

Wild and Scenic Rivers

There are no Wild and Scenic Rivers in the project area; therefore, the Proposed Action will have no effect on Wild and Scenic Rivers.

Cumulative Impact

Based on the review and findings of known ongoing, planned, and proposed projects in the area near the Friedman Memorial Airport, it is concluded that the projects listed and evaluated in the FEA will not cause any cumulative impacts in association with the Proposed Action. This conclusion was reached because these projects either 1) do not affect lands in the immediate vicinity of the Airport, and/or 2) the construction/implementation of the projects are occurring or have occurred on a different timeline than the proposed airport improvements. Future federal projects will be subject to review under NEPA to determine if significant environmental impacts are likely and identify mitigation measures for any identified adverse effects.

MITIGATION:

Mitigation measures for various resources are included as part of the Proposed Action to avoid, reduce, or minimize impacts and are discussed in Chapter 4 of the FEA. The Airport Sponsor has committed to the following minimization and mitigation measures as part of the Proposed Action:

- The following measures are recommended to avoid or minimize effects on special status and migratory birds:
 - If construction will occur during the nesting season (February 1 through September 30), a qualified biologist will conduct a pre-construction nesting bird survey within 7 days prior to construction or land disturbance. Survey protocol should include specific tasks to address the potential presence and breeding activity of red-tailed hawk and cavity nesters. Due to the high potential for nesting birds to be present and to utilize the site, the following Best Management Practices (BMPs) are recommended to reduce or eliminate impacts to nesting birds:
 - Prior to nesting season, remove suitable nesting habitat features from the project area/construction footprint. Management activity should include vegetation removal to minimize nesting habitat including mowing, grubbing, tree, and shrub removal. Habitat removal should be conducted during nonbreeding season (October 1-January 31), if practicable.
 - During nesting season, if construction must occur during the nesting season, minimize vegetation removal to the maximum extent possible. Conduct nesting season preconstruction nest surveys 7 days before disturbance or vegetation removal to identify and protect any nesting birds that may be affected by project activities.
- To mitigate the effects of removing the windrow trees near the farmstead, an MOA was signed on November 15, 2018, by the FAA and Idaho SHPO, with the Airport and the Eccles Flying Hat Ranch signing as concurring signatories. Mitigation measures are outlined in the finalized MOA (included in Appendix G of the FEA) and include:
 - Provide a display/interpretive panels, which will be displayed at the Airport in a public area. The display/interpretive panels will provide information about the agricultural history of the Wood River Valley. Idaho SHPO will be given the opportunity to review and provide comment on the content and design of the displays prior to them being finalized; and,
 - Replant low growing shrubs near the farmhouse to replace the trees that will be removed between the farmhouse and the end of the runway at the Airport. Low growing shrubs are to be approved by the owner prior to installation.

PUBLIC INVOLVEMENT:


The Draft EA was made available for public review online and as a printed document beginning on March 20, 2019, with a due date for comments of May 3, 2019 (45 days of availability and opportunity for comment). The Airport Sponsor held a public hearing on April 23, 2019 (transcripts are found in Appendix H of the FEA). Agency and public comments received during the 45 day comment period were considered in the development of the FEA and this FONSI. During the public hearing, comments

from four (4) parties/individuals were received, and an additional three (3) comments were received during the comment period following the public hearing. Thereby, a total of seven (7) parties/individuals provided comments. Responses to all verbal and written comments are provided in Appendix J of the FEA.

ENVIRONMENTAL FINDING AND APPROVAL:

I have carefully and thoroughly considered the facts contained in the attached FEA. Based upon that information, I find that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and other applicable environmental requirements. I also find the proposed Federal action will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2) (c) of NEPA. As a result, the FAA will not prepare an environmental impact statement for this action.

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(Date)