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AIRPORT LAYOUT PLAN
NOTE: NO NEW DATA WAS AVAILABLE TO UPDATE THE WIND COVERAGE.

NOTE: NO NEW DATA WAS AVAILABLE TO UPDATE THE WIND COVERAGE.

NOTE: NO NEW DATA WAS AVAILABLE TO UPDATE THE WIND COVERAGE.

NOTE: NO NEW DATA WAS AVAILABLE TO UPDATE THE WIND COVERAGE.
NOTE: 1. THERE ARE NO SCANNED DIGITAL PHOTOGRAPHS BEYOND THE RUNWAY PROTECTION ZONE. SEE INNER APPROACH SURFACE DRAWINGS FOR TERRAIN AND OBJECTS IN APPROACHES.

EXTYLE CIVIL AIRPORT IMAGINARY SURFACES

CONICAL SURFACE
AIRPORT ELEVATION
150' ABOVE ESTABLISHED HORIZONTAL SURFACE
10,000' 4,000' 34:1 20:1
C NON-PRECISION INSTRUMENT RUNWAY
200' 250' 7:1
C PRECISION INSTRUMENT RUNWAY
500' 200' 7:1 10,000' 50:1
40:1 40:1
40:1 5000' 7:1 8000'
50,000' 1,200'

TYPICAL CIVIL AIRPORT IMAGINARY SURFACES

LEGEND

AIRPORT PROPERTY BOUNDARY

NOTE: 1. ALL EXTENTS, EXCEPT Runway, DERIVED FROM USGS DIGITAL ELEVATION MODEL (DEM) NOT FIELD SURVEY
DATA: FIRST NATIONAL ELEVATION DATA NET (FNED) 1:1 ARC SECOND DATA BITE: NAVIT AND NAVIT2 2013

NOTE: 1. ALL ELEVATIONS (EXCEPT RUNWAY) DERIVED FROM USGS DIGITAL ELEVATION MODEL (DEM) NOT FIELD SURVEY
DATA: FIRST NATIONAL ELEVATION DATA NET (FNED) 1:1 ARC SECOND DATA BITE: NAVIT AND NAVIT2 2013

OBSTRUCTION TABLE

<table>
<thead>
<tr>
<th>NUMBER</th>
<th>DESCRIPTION</th>
<th>TOP ELEVATIONS</th>
<th>AMOUNT OF PENETRATION AND SURFACE</th>
<th>PROPOSED DISPOSITION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>REMOVE WITH FUTURE PROJECT</td>
<td></td>
</tr>
<tr>
<td>35' (OBSERVED) ABOVE EG @ EDGE OF PRIMARY SURFACE VARIOUS LOCATIONS</td>
<td>TREES</td>
<td>VARIES BY LOCATION</td>
<td>REMOVE WITH FUTURE PROJECT</td>
<td></td>
</tr>
<tr>
<td>~35' OF TRANSITIONAL SURFACE</td>
<td>TREES</td>
<td>VARIES BY LOCATION</td>
<td>REMOVE WITH FUTURE PROJECT</td>
<td></td>
</tr>
<tr>
<td>~25' OF APPROACH SURFACE</td>
<td>TREES</td>
<td>VARIES BY LOCATION</td>
<td>REMOVE WITH FUTURE PROJECT</td>
<td></td>
</tr>
</tbody>
</table>

DATA CREDIT: NATIONAL ELEVATION DATA SET (HTTP://NED.USGS.GOV/) 1/3 ARC SECOND DATA BITE: NAVIT AND NAVIT2 2013

COPYRIGHT: MORRISON-MAIERLE, INC., 2015

APPROVED BY:

DATE:

DRAWN BY:

DATE:

DESIGNED BY:

DATE:

PLOTTED BY:

DATE:

BASE DRAWING:

SCALE: 1"=2000 FEET (FULL SIZE)

TOWNSHIP 13S., RANGE 5E. P.M.M.

SHEET NUMBER

PROJECT NUMBER

DRAWING NUMBER

THESE PRINTS MAY BE REDUCED. LINE BELOW MEASURES ONE INCH ON ORIGINAL DRAWING. MODIFY SCALE ACCORDINGLY!

VERIFY SCALE!

SEPARATE DRAWINGS FOR ADDITIONAL DETAIL

©2015 MAGNETIC NORTH
LEGEND

- **MAGNETIC NORTH**
- **SCALE: 1"=300 FEET (FULL SIZE)**

EXIST., & ULT. THRESHOLD SURFACE
1,000' x 3,800' x 10,000' @ 30:1

**OBSTRUCTION TABLE**

<table>
<thead>
<tr>
<th>NUMBER</th>
<th>DESCRIPTION</th>
<th>TOP ELEVATIONS</th>
<th>AMOUNT OF PENETRATION AND SURFACE</th>
<th>PROPOSED DISPOSITION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

1. ALL TREES ON AIRPORT HAVE NOT BEEN SURVEYED. LIMITED FIELD MEASUREMENTS REFLECT LODGEPOLE PINE TREES WITH HEIGHTS UP TO 35’. NOTED: ALL ELEVATIONS (EXCEPT RUNWAY) DERIVED FROM USGS DIGITAL ELEVATION MODEL (DEM), NOT FIELD SURVEY. SEE ADDITIONAL DEM INFO IN NOTES OF SHEET 4.

**NOTES:**

- REMOVE TREES WITHIN FOOTPRINT OF APPROACH SURFACE TO ~ 27+00 TO PROVIDE 10' CLEARANCE. FUTURE PROJECT (2016)
- REMOVE WITH FUTURE PROJECT (2016)
- TREE COVER
- ELEV. + 35' = VARIES

**SCALE:**
- **VERT. SCALE** 0 = 1', 0+00 = 0
- **HORIZ. SCALE** 0 = 1', 0+00 = 0
A TRACT OF LAND LOCATED IN SECTION 15 AND 22, TOWNSHIP 13 SOUTH, RANGE 5 EAST,
AIRPORT DEVELOPMENT

EXHIBIT A - AIRPORT PROPERTY MAP

LEGEND

- PROPERTY APPN
- BUILDING
- CONTROL POINT
- DESIGNATED USE
- AIRPORT BOUNDARY
- ROADWAY
- REPORTOIRE
- PARCEL NO.
- PROPERTY OWNERSHIP
- GALLERY DRAWER
- SPECIAL USE
- GRANTOR
- DESCRIPTION
- CS
- D.O.T. AERONAUTICS DIV.
- AIRPORT REFERENCE POINT
- CONSTRUCTION POINT
- DRAWER REFERENCE POINT
- DATE ACQUIRED
- RECORDING INFO.
- LOCATION
- INTEREST
- ACRES
- PERMIT
- CORRECTION DEED
- DATE
- APPR. BY:
- DATE
- Q.C.
- STB
- TJE
- C.JF

LEGAL DESCRIPTION OF PROPERTY BOUNDARY
YELLOWSTONE AIRPORT

Beginning at the corner common to Sections 20, 21, 26 and 27, which is 1.1/4 miles to the southeast of the intersection of the

TRACTIONS OF LAND LOCATED IN THE NORTHEAST QUARTER OF SECTION 21, TOWNSHIP 13 SOUTH, RANGE 5 EAST, P.M.M., GALLATIN COUNTY, STATE OF MONTANA


863'20"00'00" 1714.33 feet to the true point of beginning, which is an unmarked point on the west side of the property line of the

REDUCED. LINE BELOW THESE PRINTS MAY BE

NOTE:

TO APPROPRIATELY REFLECT PROPERTY OWNERSHIP.

ALL LEGEND HATCHING MAY NOT BE SHOWN ON THIS SHEET

NOTE:

THE PURPOSE OF THIS DRAWING IS TO PROVIDE INFORMATION FOR ANALYZING THE CURRENT AERONAUTICAL USE OF

LAND ACQUIRED WITH FEDERAL FUNDS. THE INFORMATION SHOWN IS FROM THE "YELLOWSTONE AIRPORT PROPERTY MAP, EXHIBIT 2" 8-20-0082-007, WEST YELLOWSTONE, MONTANA" FROM MORRISON MAIERLE CSSA ENGINEERS PLANNERS SURVEYORS, DATED 12/1993.

H-MARKER

SCALE: 1"=600 FEET (FULL SIZE)

MAGNETIC NORTH
CULTURAL RESOURCE INVENTORY OF THE YELLOWSTONE AIRPORT TERMINAL AREA, ADDENDUM, AND SUPPORTING CORRESPONDENCE
Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT

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And

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US West Research, Inc.
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Prepared for:
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April 2019
Abstract
Morrison Maierle, Inc. (MM) has contracted Hope Archaeology, Inc. (HAI) to conduct a Cultural Resources Inventory (CRI) of the Yellowstone Airport Terminal Area near West Yellowstone, Montana. MM is overseeing the production of a Terminal Area Narrative and requested that HAI complete an inventory of the terminal and parking area. The inventory took place within two sections, Township 13S, Range 5E, Sections 21 and 22, containing 8.7 acres in Gallatin County, Montana. The intensive Class III cultural resource inventory was required to locate and record all cultural properties that have surface and exposed profile indications within the area. Two historic resources, the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon (24GA1981), are located within the Area of Potential Effect (APE)(Figure 1). These properties were documented during the current inventory and are both recommended eligible for listing to the National Register of Historic Places.
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1.0 Introduction

Morrison Maierle, Inc. (MM) has contracted Hope Archaeology, Inc. (HAI) to conduct a Cultural Resources Inventory (CRI) of the Yellowstone Airport Terminal Area rests approximately 1 mile north of the townsite of West Yellowstone, Montana (Figure 1). MM is overseeing the production of a Terminal Area Narrative and requested the terminal, parking area, and a buffer be inventoried for cultural resources and an NRHP evaluation made of the resources within the designated APE (Figure 1). The inventory resulted in the identification of two historical cultural properties within the APE. The APE for the 8.7-acre CRI surveyed for under this report is located in:

T13S R5E, Sections 21 and 22

The intensive Class III cultural resource inventory was required to locate and record all cultural properties that have surface and exposed profile indications within the area. In general, site evaluations were conducted using existing guidelines from the Montana State Historic Preservation Office (SHPO), the National Register Criteria (36 CFR 60.4), and National Park Service National Register Bulletins. This document describes the results of the field investigations.

2.0 Literature Search

HAI conducted a file search through the Montana SHPO and received the official CRIS and CRABS reports on November 25, 2016. This file search returned results indicating that one previous investigation had been conducted within the sections containing the current APE resulting in the documentation of no sites within the current inventory area. Personal conversations with MM Airport Engineer, Travis Eickman, as well as an examination of the original Yellowstone Airport Plans (Yellowstone Airport West Yellowstone, MT F.A.A.P., 1963; Yellowstone Airport Terminal and Maintenance Buildings F.A.A.P., 1963) also provided a further understanding of the airfield grounds and the history of the airport. In addition, GLO maps and local histories were also consulted to gain a more complete understanding of the APE.
3.0 Environmental and Cultural Setting
The APE is located within the lodgepole pine-Douglas fir forest vegetative rangeland type (Payne 1973) near Hebgen Lake and the Madison River (Figure 1). The immediate area is characterized by dense forest of lodgepole pines with undercarriage of whortleberry and snowy aster with the soil’s parent material defined as sandy and gravelly alluvium (USDA 2017). The soils within the APE generally belong to the Typic Cryochrepts Complex, obsidian sand substratum (USDA 2017). The closest source of permanent water is the Madison River, located approximately 1.1 miles east of the APE. The project elevation is at 6,645 feet above sea level. The mean annual precipitation in the area ranges from 20 to 35 inches with 50 to 70 frost-free days per year. The mean air temperature ranges from 37 to 43 degrees Fahrenheit. At the time of the survey, the direct APE exhibited light fall vegetation (see Figure 2, 3, and 4). The area is vegetated with reedgrass, elk sedge, bluegrass, and aster. Within the direct APE, the ground has been heavily disturbed across the entirety of the APE by tree clearing for inception of the airport, and by airport development since the inception (sees Figures 3 and 4).
Figure 3 - Example of ground disturbance within the Area of Potential Effect

Figure 4 - Example of the variation of ground surface visibility with the Area of Potential Effect
3.1 Prehistory
The project is located near the confluence of the Northwest Plains, Great Basin, and Plateau cultural sub-areas and peoples from all three cultural areas would have influenced the region through prehistory. Within the regional prehistory, three cultural traditions are defined as Early, Middle, and Late Prehistoric. Within these traditions, there are numerous complexes. The following is a much abbreviated description of the area’s cultural history. For a much more in depth analysis on the cultural and historic chronologies relating to the area very near the APE, please consult Landscape Overview of Missoula Resource Management Plan (RMP) Area Including Portions of Granite, Missoula and Powell Counties, Montana (Tetra Tech, Hope Archaeology, and Ethnoscience 2011) and the Cultural Resource Inventories for Mountain State Transmission Intertie (Tetra Tech, Hope Archaeology, and Ethnoscience 2011), both of which Shane Hope, the lead author on this report, helped author. The following excerpts come from the sections of the said studies that Mr. Hope helped author.

3.1.1 Early Prehistoric Period (Circa 10,000 to 5,000 BC)
The onset of this tradition corresponds with the initial human occupation of the region. In the study area, human occupation probably began around 10,000 years BC, after the glaciers had receded. This period occurs during a time when environmental conditions have no modern equivalent. It constitutes a mosaic distribution of animal and plant species, unusual seasonal climatic conditions, and the presence of an extinct Ice Age fauna. These post-glacial periods are commonly characterized as cool, moist, and conducive to the proliferation and expansion of the forests. Upland locations consisted primarily of grasslands or more arid sagebrush steppes (Bryson et al. 1970; Reeves 1969). Throughout the Early period, the environment became warmer, eventually leading to the extinction of the larger fauna.

Early period hunters adapted to this variable environment with a broad-spectrum of generalized foraging strategies (Reeves 2003). Technology is distinguished by the use of high-quality cryptocrystalline raw materials in the production of sophisticated toolkits geared towards the exploitation of large game. Trade networks brought in exotic lithic materials to the region. Toward the end of the Early period, basalt also became a desired raw material for the manufacture of projectile points (Deaver and Deaver 1986) and knives (Reeves 2003).

3.1.2 Middle Prehistoric Period (Circa 5,000 BC to 350 AD)
The Middle Prehistoric period occurred from circa 5000 BC to 350 AD. During this period, the forests expanded at the expense of the grasslands. In response, the peoples of the Middle period exploited a broader range of resources, focusing on those available within a smaller geographic area. The Middle period is divided into three sub-periods.

Early Middle Sub-period (circa 5,000 to 2,000 BC):
This sub-period is associated with the Altithermal (McLeod and Melton 1986), a period of more prevalent and widespread areas of drought. However, Roll and Hackenberger (1998) note several environmental studies that indicate that although changing weather patterns led to a decrease of moisture in the plains, there was an increase in effective precipitation in the Northern Rockies. In the Rocky Mountains, the forests expanded at the expense of the grasslands, especially the alpine and subalpine environments (Roll and Hackenberger 1998). Fires also became more frequent, possibly marking deliberate human activity to
increase grassland environments. Between 2,400 BC and 2,000 BC the forests were at their peak and the available grasslands were limited. The closing of the forests likely decreased the available game animals (Roll and Hackenberger 1998). Populations responded to this environmental change by focusing on the valley bottoms, and open south facing slopes (Roll and Hackenberger 1998).

Little is known about subsistence strategies during the Early Middle Sub-period. In the plateau, people continued a foraging economic strategy. Choquette (1987) and Thoms (1984) argue occupations focused on higher terrace and mountain slope resources. Reeves (2003) postulates in situ populations living in northwest Montana continued to live in valleys where they fished and hunted in alpine environments; however, resource gathering intensified. Reeves (2003) notes there is a decrease in exotic materials in the Glacier Park area, suggesting a breakdown of the north-south trade.

These changes are similar to those observed throughout the Plateau (Chatters 2004; Goodale et al. 2004; Prentiss and Kuijt 2004; Rousseau 2004), though Plateau sites also exhibit small hamlets consisting of one- two nuclear families living year-round in one location for one to two years before moving to a new location (Chatters 2004). This pattern is not described for sites in the Rocky Mountains. It is unknown if this is a sample bias – if the Rocky Mountains were immune to the changes wrought during the cooling trend — or if the individuals living in the Rocky Mountains at the time were able to quickly adapt to the changes they were experiencing.

**Middle Middle Sub-Period (circa 2,000 to 1,000 BC):**

By 2,000 BC, increased precipitation lead to a closed forest environment, with few open grasslands. While this environment may have been good for mountain goat and sheep populations, deer and bison populations were low (Chatters 2004). Reeves (2003) argues Great Basin populations, as marked by McKean phase projectiles, move into the region. Populations tend to congregate along river bottoms and in areas where grasses were more prevalent. Camps tended to be smaller and occupied for shorter periods.

There is some conflict in our understanding of subsistence strategies. According to Roll and Hackenberger (1998), the occupants increased the exploitation of plant and animal resources. Munger (1993) suggests populations began harvesting the timberline for whitebark pine around 2,500 BC, and Thoms argues camas exploitation intensified (Thoms 1989). However, Reeves (2003) argues there is no evidence of root harvesting or processing (Reeves 2003). Roll and Hackenberger (1998) suggest game drives and hunting blinds were important. Reeves (2003) agrees communal hunting of bighorn sheep occurred, but states communal hunting of bison did not. Around 2,000 BC (dates vary slightly by author), the plateau experiences a dramatic drop in population (Chatters 2004; Goodale et al. 2004; Prentiss and Kuijt 2004). Goodale et al. (2004), and Chatters (2004) note the lapse in occupation lasted about 400 years in the Upper Columbia Plateau region. Prentiss and Kuijt (2004) argue the change in climatic conditions caused the decrease that is observed in the archaeological record. Those who remained reverted to more mobile foraging economic patterns (Chatters 2004).
Late Middle Sub-Period (circa 1,000 BC to 350 AD):
By the Late Middle Sub-period the forests were less dense, game populations increased, and all of the Northern Rockies were exploited. Late Middle Sub-period sites are common, especially along river valleys. This is believed to be associated with a rapid population increase (Roll and Hackenberger 1998). There is a concomitant leap in the intensity of resources exploited. Seasonal movements of populations are expected of Late Middle occupations. A diverse range of resources was exploited, including pine nuts, bitterroot, biscuitroot, camas, and fish. Communal bison kills are present. Roasting pits used to process plant roots, large fire cracked rock clusters, and net sinkers are common at least in some areas. Reeves (2003) suggests some of these root crops may have been introduced into the region during this time. In addition, trade networks greatly expand (Reeves 2003; Roll and Hackenberger 1998). Many of the changes observed in the Rocky Mountains likely originated from the west.

The Plateau also exhibited a dramatic increase in population and a rapid shift to a collector economic system, similar to that observed ethnographically. This includes living in semi-subterranean houses, living in valleys in the winter, a well-developed seasonal round, the intense exploitation of fish and root crops, the presence of roasting pits and the development of storage systems. Several archaeologists (Chatters 2004; Prentiss and Kuijt 2004) feel the rapid increase and magnitude of cultural differences must be the result of coastal people moving into the region. Although not stated, it is possible this marks the movement of the Salish speakers into the region.

3.1.3 Late Prehistoric Period (Circa 350 to 1,500 AD)
In the archaeological record, the Late Prehistoric period is recognized by a change in projectile point size and type, likely reflecting a change from the atlatl to bow and arrow as the weapon of choice. This new weapon resulted in a much more efficient exploitation of upland game, particularly when employed with communal hunting techniques (McLeod and Melton 1986; Roll and Hackenberger 1998). In the Plains, the development of the bow and arrow led to increased specialization of bison hunting. In the Rockies, deer is well represented in faunal inventories, though bison also appear. The overall subsistence strategy observed in the region is similar to earlier periods. Seasonal movements of camps continued. As in the past, a diverse range of resources were exploited that included pine nuts, bitterroot, biscuitroot, camas, and fish. Roasting pits are more numerous in the archaeological record and the majority of the hearths in the region date from this period (Roll and Hackenberger 1998). Late period sites are underrepresented in the Northern Rockies and the reason for this is unknown (Deaver and Deaver 1986; Roll and Hackenberger 1998). One possibility is that minor environmental changes led to a decrease in population. Another possibility is the bow and arrow led to a new focus on upland plains resources and a movement of populations out of the mountains.

To the southeast, there is a dramatic decrease in the type of settlements within Yellowstone Park. Instead of family occupations, the park exhibits small satellite camps that arrive merely to gather game or mine obsidian. To the west, Plateau populations are at war (Chatters 2004). In response, the occupants tend to live in larger villages, to occupy protected landforms, to develop defensive structures and to travel farther in order to exploit the environment. There is also a greater recognition of status differences (Goodale et al. 2004). By 1,330 AD, the Shoshone are moving into the Southern Plateau but there is an overall decrease
in population. By 1,480 AD, the Shoshone moved into the Yellowstone Park area, as indicated by the presence of flat-bottomed Intermountain ware.

3.2 Protohistoric (Circa 1500 to 1800 AD)

The transition from prehistoric groups to the ancestors of tribes that occupied Montana is extremely difficult to trace. Throughout time, the tribal groups in Montana shifted, expanded, and contracted their territories as they adjusted to the seasonal, annual, and long-term cycles of resource availability. Populations made alliances, intermarried, traded, raided, and warred with other groups. This would result in the dissemination of information over large areas and amongst competing groups. There is no reason to assume that the makers of a particular projectile point style spoke the same language. It is probable that a variety of groups who may have spoken different languages used Montana on an episodic basis. These groups were probably in contact with each other and shared ideas about such things as the way to make arrow points.

During this period non-native influences began to have a profound effect on Indian populations occupying the study area. The arrival of the horse, the fur trade, guns, and European diseases to native populations are of particular importance, although the initial impact of these influences was indirect. The first major change to Native American lifeways during this period was the arrival of the horse into the region in the 1,500s (Haines 1938). Horses were generally obtained from tribal populations living farther south who got their horses either through strays that had wandered away or were stolen from the Spanish in the sixteenth and seventeenth centuries. As their herds expanded, they traded horses along traditional trade networks to tribes in the north (Deaver 1983). The Shoshone obtained horses from their southern relatives, the Comanche, and used this advantage to expand into and dominate the northern Rockies and the high Plains. Although their territory is unknown, several scholars believe Shoshone territory may have extended into Alberta and Saskatchewan to the north and as far as South Dakota to the east (Kehoe 1981:288; Shimkin 1986; Sturtevant 1954; Trenholm and Carley 1964). During this period, they were considered enemies of the Salish and Pend d'Oreille, who occupied the territory to the north in the Rocky Mountains. However, Plains Shoshone dominance was short lived.

The second profound change caused by European contact was disease. Arguably, the most devastating of all these were smallpox, but other diseases (measles, scarlet fever, etc.) were also deadly. European diseases whipped through tribes indiscriminately killing large percentages of the population. The first historically documented smallpox outbreak in the Columbia Basin occurred around 1760 (Fahey 1986); however, it is unknown whether it spread to the study area. Tradition indicates the Crow brought smallpox to the Salish. This would suggest around 1780-1781 the first reported smallpox epidemic swept the Northwest Plains. Disease killed between one-third and two-thirds of the Salish and Pend d’Oreille peoples by 1801 (Ray 1939; Teit 1930). Four years later, the Salish may have numbered only 600 individuals (Nabokov and Loendorf 2002). The remnants of the Tuna’xa and SEmt. ê’use were further decreased and forced to join the Pend d’Oreille, Salish or Kootenai for protection (Malouf 1998; Teit 1930; Walker and Sprague 1998). In every decade of the 1800s, successive waves of disease ravaged the tribes, reducing their numbers and disrupting their socio-economic structure. Tribes suffering the effects of disease were
often at a disadvantage to tribes not undergoing an epidemic. Social cohesion was also disrupted as the leaders of the band/societies fell victim to disease.

The third major change came from the introduction of the fur trade. The fur trade provided European trade goods in exchange for furs. Indian adaptation patterns in the Northern Plains and to some extent the tribes within the study area shifted from a subsistence-based economy to a trade-based economy. Native Americans changed their hunting patterns to obtain the furs highly desired by Europeans, placing a greater emphasis on gathering beaver pelts and other trade commodity furs. The fur trade also changed the perception of land ownership. The exclusive right to use particular territories became more important to tribes in the Northern Plains (Deaver 1983). It was through the fur trade that the tribes obtained guns. This changed the dynamics of inter-tribal warfare and provided those with guns the advantage over those who could not get them. As tribes obtained military advantage, they used that power to maintain their territorial boundaries and expand into the territories of their rivals.

The Blackfoot and their allies, the Atsina, Bloods, Piegan and Sarsie, received the gun from fur traders to the north and east earlier than their enemies to the west and south. The Crow received the gun earlier than the tribes to the west through their relatives, the Hidatsa in central North Dakota. This gave the tribes a military advantage over any surrounding tribes who were armed only with bows and arrows or clubs and lances. Over the next 50 years, dramatic changes occurred in the distribution of people in the region.

The Shoshone were the first to be impacted. The repeated Blackfoot and Crow attacks forced the Shoshone out of the Northern Plains. The Blackfoot then attacked the tribes at the foothills of the mountains. Warfare killed almost all of the Tuna’xa and the majority of the SEMTE ‘e use. Those that survived were absorbed into the Kootenai or Pend d’Oreille. The Pend d’Oreille and some of the Kootenai moved south, while other Kootenai moved north to avoid the Blackfoot. The Salish where forced out of the plains and began wintering as a group in the Bitterroot valley. For a period, the tribes stopped going into the plains to hunt bison (Teit 1930).

To survive, the tribes needed to increase their numbers. Villages joined into composite bands, composite bands joined to become unified tribes, and tribes forged alliances to act as multi-tribal units (Walker and Sprague 1998). The eastern Salish speaking tribes (the Salish, Pend d’Oreille, Kalispel, Nez Perce, Spokane, and Coeur d’Alene) were already peaceful to one another and quickly became allies. These tribes commonly visited the other’s territories to gather plants, hunt, and fish. These alliances became particularly important when tribes went into the plains to hunt bison. Not only did larger forces deter attacks from hostile Blackfoot and Crow, but also large numbers were necessary to flank herds with enough hunters to effectively hunt bison (Murphy and Murphy 1986).

The first enemies to form an alliance in the region were the Salish and the Shoshone. Together, the Lemhi and Salish would hunt bison at the headwaters of the Missouri (Three Forks) and east past Bozeman, except when prevented by the Blackfeet (Murphy and Murphy 1986). The Shoshone eventually moved south into Wyoming and the Yellowstone Park area (Malouf 1975). Continuing Blackfoot and Crow attacks forced the Salish into the region the Shoshone abandoned, establishing headquarters within the Bitterroot
Valley at the southern end of Salish Lake and near Plains, Montana (Chalfant 1974; Malouf 1974; Reeves 2003).

As the Salish shifted to the south, the Pend d’Oreille moved south into territory the Salish formerly occupied. Around 1800, the Kootenai leader Bad Road forged a peace agreement with the Salish. With the establishment of peace, the eastern or “Upper Kootenai” became closely allied with the Pend d’Oreille to the south, often joining them for seasonal bison hunts (Chalfant 1974; Malouf 1974; Reeves 2003). One reason the Kootenai may have wanted to move south was the fact that they apparently over-hunted deer in the Tobacco Plains area of present-day Canada (Schaeffer 1940).

In addition to increasing their numbers, the mountain tribes needed guns to equalize the Blackfoot military advantage. As early as 1795, the Kootenai attempted to bribe the Blackfoot with horses to allow travel to eastern fur trade forts to obtain guns. The Blackfoot, aware that this would remove their advantage, denied them access (Ewers 1982). Undeterred, a group of Nez Perce traveled to the Mandan Villages in 1805, where they obtained six guns (Ewers 1982). The Kootenai and Salish were outfitted for trapping and received guns on a regular basis with the addition of the fur trade forts in 1808 (Ewers 1982; Fahey 1974). The tribes now felt they were able to protect themselves from their enemies. The need for guns and ammunition was a pivotal element of the desire to maintain friendly relations with non-Native American people in the region throughout the seventeenth century.

3.3 History

In historic times, it appears that this part of Gallatin County was not the permanent year-round home of any particular Indian tribe. In the winter, valley snows were most likely too deep for sustained occupation by any tribe. However, in the summer, lush grasses, fishing streams and plentiful other resources caused many tribes to visit Three Forks, which served as a corridor for tribes venturing to the buffalo plains to the east. Furthermore, in the earliest treaties with tribes, the entire southwestern portion of Montana was designated as "common hunting ground," to be shared by the Bannock, Shoshone, and the Flathead tribes, although the Crow Tribe sometimes also hunted in the valley (Burlingame 1976).

The first well-documented presence of non-Native Americans in the study area occurred in 1805 with the arrival of the Corps of Discovery, led by Meriwether Lewis and William Clark. The primary objective of the expedition was to find a water route to the Pacific (Ambrose 2003). President Jefferson also wanted to ascertain the fertility of the region to support settlers, to observe, and record the entire natural history and ethnology of the area they explored, and to determine how the United States could complete with the British dominance of the fur trade (Ambrose 2003). The expedition departed St. Louis in May 1804 and crossed through the study area in July of 1805, and in July of 1806.

On July 25, 1805, Clark reached the three forks of the Missouri River whereupon he chose to ascend the westernmost fork, the Jefferson River (Coues 1965). Lewis and the remainder of the expedition with all the boats reached the mouth of the Jefferson River on July 27 (Coues 1965). Finding the note Clark had left behind; they began to ascend the Jefferson as well, eventually reaching the Pacific Ocean. Nearly a year later, on June 29, 1806, Lewis and Clark crossed over the Bitterroot Mountains and re-entered present-day Montana (Coues 1965). They followed Traveler’s Rest Creek and reached its mouth, just south
of present-day Missoula on July 1st (Coues 1965). On July 3rd the expedition split into two groups: Lewis with nine men would journey by the most direct route to the Falls of the Missouri and from there, Lewis with 6 men would set out to explore the Marias River and the remaining 3 men were to remain at the falls and prepare for the portage of the canoes around the falls. In the meantime, Clark with 19 men and Sacajawea would journey to the head of the Jefferson River and from there to their August 1805 encampment at Camp Fortunate (at present day Clark Canyon Reservoir) and retrieve their buried supplies and the canoes. Clark would then descend the Jefferson River with ten men and Sacajawea would travel to the Yellowstone River, descend it, and await Lewis at the mouth of the Yellowstone; the remaining crew with Clark would travel to the “Falls of the Missouri” (Coues 1965).

Trappers and fur traders entered the region soon after the Corps of Discovery’s journey was completed. The trappers and fur traders consisted primarily of individuals seeking quick wealth. They were generally composed of young to middle-aged single men who seldom settled in the region and were not interested in establishing a long-term presence. Traders and trappers worked alone or in small groups, operating at the pleasure of the Indians who controlled the area. The main trapping area was from just east of the Powder River and extended westward to the Big Hole River and from north of the Musselshell River southward to the Wind River (Wisehart 1979). The portions of this area richest in beaver fur were the Three Forks area, and Big Hole River area north and northwest of the current APE. This fact would bring the American trappers into direct confrontation with the Blackfoot and their allies, and eventually bring the tribes west of the Rockies and the Crow into the America-European sphere of influence.

John Colter was the first recorded trader to explore much of southwest Montana and Eastern Idaho in 1808 and may well be the first euromerican to pass in or near the current APE (ISHS 1973). Colter had been an important member of the Lewis and Clark expedition and, when the rest of the Corps returned to St. Louis, Colter, and Manuel Lisa, another Corps member, returned to the Upper Missouri region to establish a fur trading enterprise in 1807. By the spring of 1807, they had established a trading outpost, known as Fort Manuel Lisa or Fort Raymond, at the confluence of the Yellowstone and Big Horn Rivers in eastern Montana, and accumulated a large number of valuable pelts, which they returned to St. Louis for a tidy profit. This fort soon became center for trade between the Crow and the Missouri Fur Company. The success of this venture led to the establishment of the Missouri Fur Company by Lisa, William Clark, Andrew Henry, Pierre Menard, and several important St. Louis merchants and politicians in the winter of 1808-1809 (Wishart 1979).

In 1810, a year after the Missouri Fur Company had successfully established several more outposts in the Dakotas, Andrew Henry, Pierre Menard, and John Colter led an expedition from Fort Manuel Lisa to the Three Forks area and built an outpost, about two miles above confluence of the Jefferson and Madison Rivers (Chittenden 1986). This trapping operation showed instant promise as the region proved to be excellent beaver county; however, the trappers were soon under attack from the Blackfoot who, while they had a business relationship with the British traders to the north, did not allow any trapping or trading within their hunting grounds by anyone, especially those who were actively trading with their traditional enemies, including the Crow. The constant harassment of the Blackfoot soon convinced Pierre Menard and many of the trappers that the potential profits were outweighed by the significant risk of death. Taking the 30 packs of beaver pelts the expedition had trapped before the conflicts, Menard returned to
St. Louis by mid-July, 1810 (Chittenden 1986). Andrew Henry (for whom Henry’s Lake to the south of the current APE was named) and a group of hunters/trappers remained at the Three Forks outpost until the fall of 1810. By the time the post was abandoned, the expedition had lost between 20 and 30 members of their members to fighting with the Blackfoot, including Drouillard, another veteran of the Corps of Discovery (Wishart 1979). War between Britain and the United States erupted in 1812. The British blocked the port at New Orleans, which depressed the American fur trade (Wishart 1979). For the next eight years, there was little American effort to trade in western Montana and the Pacific Northwest. Meanwhile, the North West and the Hudson Bay companies continued to profit from the fur trade; however, bickering between the two companies erupted in violence in 1816, greatly decreasing profits.

American fur traders returned to the region in the spring of 1823, but found the area depleted of beaver; however, beaver were still abundant further west along the Jefferson and Big Hole rivers. Efforts to establish fur trade posts in the region met again with resistance from the Blackfeet, who perceived American traders as friends of their enemies. Thus, rather than trying to establish a series of expensive and vulnerable trade posts after having been driven out of the region, American fur trade companies opted for annual “rendezvous” to conduct trade at various locations with various tribes (Malone et al. 1984). The practice proved so successful for the American traders that the rendezvous system became the dominant fur trade model from 1824 to the mid-1830s. The fur trade economy changed the 1830s as many of the traditional beaver trapping grounds were worked out and the beaver market and other furs disappeared as fashion changed in Europe (Larpenteur 1962; Malone et al. 1976).

Following the end the fur trade, settlement eventually took place along the Madison, Jefferson, and Gallatin Rivers. These communities provided agricultural products for the early gold camps. In 1862, with the completion of the Mullan Road, the intensification of the Civil War, the decline of the California, Colorado, Nevada, and Idaho gold rushes, and the discovery of placer gold at Grasshopper Creek, Montana was on the verge of its own expansion. With the arrival of tens of thousands of miners (not to mention those mining the miners), camps, and shanty towns sprung up almost immediately. Gallatin County, which was founded in 1865, is one of the most important counties in Montana because of the agricultural richness of the area, as well as the proximity to large mineral deposits in Virginia City and later Butte, to the west.

The dedication of Yellowstone National Park in 1872 began to spur interest in tourism through the West Yellowstone area (Madison Basin) along established Native American trails. These new travelers mostly arrived in the region via railroad railheads in Idaho and Montana and continued their journey to the park by stagecoach. Tourism started somewhat slow through the western entrance in the Madison Basin. F.J. Haynes (owner of the Monida & Yellowstone Stage Line) reported that his company transported 414 people in 1899; however, by 1907 those numbers had rose to 2,270 (Yellowstone Historic Center 2019). This growth prompted the establishment of ranches, homesteads, and inns (such as Dwelle’s Grayling Inn) along the western edge of the park and along the Madison River in the vicinity of West Yellowstone.

After a trip through Yellowstone Park by F.J. Haynes and E.H. Harriman (president of the Union Pacific Railroad) in 1905, the order to extend the Union Pacific’s Shortline from Ashton, Idaho was made, and construction was started almost immediately (Yellowstone Historic Center 2019). The construction of the
Union Pacific’s Oregon Shortline Terminus at the west entrance to Yellowstone National Park from Idaho in late 1907 acted as the impetus to establishment of the West Yellowstone area as a residential and commercial development. The Union Pacific built the impressive Union Pacific depot in 1909 in an effort to capture a larger share of tourist dollars in their competition with the Northern Pacific’s monopoly on the north entrance to Yellowstone Park. To compete with the sudden influx of small local restaurants and hotels, the Union Pacific constructed the Beanery dining hall in 1911 and expanded their influence in the 1920’s with the construction of dormitories. While the summertime tourist season saw a significant amount of activity during this time, the Town of West Yellowstone was largely abandoned in the wintertime outside of a handful of hardy “squatters” who built residences on US Forest Service lands in the area. In 1919, Woodrow Wilson (under protest from E.H. Harriman) signed the order to remove the ownership of land from federal ownership and the township of West Yellowstone was officially established (Yellowstone Historic Center 2019).

3.4 Yellowstone Airport History
By the end of World War I, aircraft design and engine development had progressed to a remarkable degree of efficiency with pilots no longer flying on a "wing and a prayer" and in the mid-to-late 1920s, the commercial air business began to bloom in Montana. By 1927, National Parks Scenic Airways, located in Billings, Montana, began flying passengers to numerous Montana destinations, such as Helena, Great Falls, Bozeman, and as far as Cody, Wyoming and Lewiston, Idaho. Soon thereafter, National Parks Airways acquired an airmail contract with the U.S. Post Office, becoming Montana’s first scheduled airline to receive such a contract. On August 1, 1928, National Parks Airways inaugurated airline service between Salt Lake City, Utah and Great Falls, Montana under this contract (Wiley, 1966).

In 1932, West Yellowstone residents founded the West Yellowstone Commercial Club to start securing funds for the construction of a local airport and to file successfully for a special use application with the U.S. Forest Service (USFS). The permit expired; however, in 1934 it was reissued to Gallatin County. In autumn of 1933, the USFS, specifically the Targhee National Forest, contributed a 130-acre tract of land directly west of the city limits bounded by Iris Street for the airport. Local labor and private capital was initially used to clear the standing timber, amounting to over one half million trees. However, due to mounting costs, the work was stopped until the Civil Works Administration (CWA) and airport division of the Federal Emergency Relief Administration (FERA) contributed roughly $147,000 to finish preparing the land. The runway was leveled using gravel removed from a large pit between the two runways (West Yellowstone Historic Center, 2016). The entire project required a year and half to construct the runway and the modern new air terminal in its primitive surrounding of tall pines (The Salt Lake Times, 23 June 1935). Meanwhile, in August 1933, Scenic Airways secured a contract to deliver winter mail to the Town of West Yellowstone three times a week (West Yellowstone Historic Center, 2016).

The Yellowstone Airport was dedicated on June 22, 1935 and attended by thousands from major cities in the Rocky Mountain area to witness the advent of transport and airmail service to a national park. The celebration featured maneuvers of a fleet of army planes from the army and naval base at Seattle, Washington and airplane trips over Yellowstone and Grand Teton National Parks (The Salt Lake Times, 22 June 1935). At the close of the ceremony, a National Parks Airway plane flew out of the airport with 12,000 special first day letters. Copper souvenirs were attached to all letters contained in the initial airmail
consignment out of the Yellowstone Airport (*The Salt Lake Times*, 23 June 1935; *The Daily Inter Lake*, 3 August 1935).

By June 1935, National Parks Airways provided Utah cities with early morning and afternoon flights to the famous western gateway of Yellowstone Park. The new service, the first operation of any scheduled airline to a national park gateway, also provided one daily flight to West Yellowstone from Butte, Montana, except Saturdays and Sundays, and two return flights. The airline had installed radio equipment in its hangar to accommodate the airline's operations. Additionally, the U.S. Post Office authorized regularly scheduled daily flights to the newly constructed Yellowstone Airport by National Parks Airways, making it the highest elevation airport located in the United States to be serviced by mail and transport airplanes (*Ogden Standard-Examiner*, 11 June 1935; *The Salt Lake Tribune*, 22 June 1935; *Montana Butte Standard*, 20 July 1935).

A year later, a celebration at the Yellowstone Airport marked and commemorated the establishment of the airport, which had been grubbed from solid timber to provide an excellent landing field. Governors from Montana, Idaho, Wyoming and Utah attended and spoke during the morning's program and celebrated recognition of the airport as a regular stop on an air route and the start of the first direct air service to a national park. The Yellowstone Airport cost approximately $2,000 and was only about eighty percent complete (*The Salt Lake Tribune*, 15 June 1936; *Montana Butte Standard*, 16 June 1936; *Montana Butte Standard*, 24 June 1936). Additionally, that season, the National Parks Airways began to operate a scenic air tour of Yellowstone and Grand Teton National Parks as an "outstanding feature of its vacation service." The tours originated and terminated at the Yellowstone Airport and started on June 10, 1937 (*The Independent Record*, 31 May 1937).

However, on August 1, 1937, Western Air Express acquired and took over the operations of National Parks Airways. This merger increased service to Las Vegas and the west coast airports like Los Angeles and San Diego (*The Independent Record*, 1 August 1937). A year later, Western Air showed a marked increase in passenger service, which officials attributed to daily air service to Glacier and Yellowstone National Parks. They even promoted and provided a one-day fishing tour to Yellowstone Park. A sportsman could now fly from Los Angeles to Yellowstone Airport from where the fly-fisherman could be fully equipped with tackle, bait, motor boat and guide, and driven to the famous trout fishing waters of Hebgen Lake and the Madison River (*The Independent Record*, 12 July 1938). By 1940, Yellowstone Park air traffic was at an all-time high and as a result, Western Air Express furthered a new scenic excursion. The airline inaugurated a route that took the passenger from Salt Lake City to the Yellowstone Airport following the Snake River, crossing the edge of Jackson Lake and the Tetons and passing over Old Faithful geyser (*The Ogden Standard-Examiner*, 18 June 1940; *The Post Register*, 16 August 1940). However, with the bombing of Pearl Harbor on December 7, 1941 and the coming of World War II, service to the Yellowstone Airport was deemed "non-essential" due to the war effort (West Yellowstone Historic Center, 2016).

Following World War II, Yellowstone Park tried to return to normalcy but had difficulties during the postwar period. While visitation was up because the American public wanted a change of scenery and national parks were among the places they traveled to looking for it, the Northern Railroad found Yellowstone Park tourism less profitable than it had been in earlier times and decided to give up re-
establishing the former pattern of passenger traffic to the park. Air service was thereafter seen as a substitute for rail service as a prime carrier for continuing tourist traffic into the Park (Haines, 1977).

In June 1946, Yellowstone National Park was linked once more to the nation's airline network, when Western Air Lines began landing two flights daily at the Yellowstone Airport. One flight was from Los Angeles to Great Falls with a stop at West Yellowstone and the other was a one and three-fourths hour direct flight from Salt Lake City to the airport (The Salt Lake Tribune, 17 June 1946). However, in March 1948, changes in civil air regulations prohibited Western Air Lines from continuing commercial summer service between 10 a.m. and 4 p.m. because of "local wind and runway conditions." Apparently, the trees at the end of the runway had grown to be dangerously tall. The closest airport that could bring commercial passengers to Yellowstone National Park was at Bozeman, Montana. The commercial service suspension came at a time when visitation to Yellowstone National Park had reached over 1 million for the first time with the west entrance being the most popular gateway. Because of the suspended service, only twenty-two visitors arrived by plane that year (The Salt Lake Tribune, 28 March 1948; West Yellowstone Historic Center, 2016; The Post Register, 11 October 1948; The Post Register, 13 October 1949).

Although commercial service was suspended at the Yellowstone Airport, private planes continued to use the airport even after 1948. Meanwhile, in 1951, NPS and the Civil Aeronautics Administration and Western Airlines officials met to consider re-establishment of commercial service to serve the Park (Haines, 1977). Transformation of that idea came in September 1958 when Senator Mike Mansfield (D-Montana) and several Interior Department agencies began to lobby for a new airport at West Yellowstone to serve Yellowstone Park and adjoining areas in Montana, Idaho, and Wyoming. The problem was appropriating the money and dividing responsibilities between the federal agencies and the Montana Aeronautics Commission (MAC). At that point, it was decided that the USFS would act as the contracting agency and joint sponsor for construction of the new airport on land it administers, the Civil Aeronautics Administration (CAA) and the National Park Service (NPS) would share the construction costs and MAC would maintain and operate the airport (The Independent Record, 11 September 1958).

By 1961, however, plans changed. At that time, MAC has instead accepted sponsorship of the construction and operation of the new Yellowstone Airport and requested federal funding for the project. Construction planning was put in charge of the Federal Aviation Agency (FAA, the Federal Aviation Agency changed to the Federal Aviation Administration in 1967), NPS, and the USFS (The Montana Standard, 14 July 1961). Administration Funding came in September of 1961 when a Senate Committee approved $735,000 for construction of the new airport with a 7,000-foot runway, long enough to handle commercial flights. State funds would be used to administer the construction and operation of the airport (The Billings Gazette, 23 September 1961). Nonetheless, the House of Representatives rejected the appropriation. It was hoped that the project would be included in the regular 1963 fiscal year budget (The Montana Standard, 15 October 1961). President John F. Kennedy did include funding in his budget that year: $165,000 for a new terminal building, utilities, landscaping, etc. and $570,000 for construction of the runway, including the runways, taxi strips, aprons, and service roads (The Independent Record, 18 January 1962; The Montana Standard, 29 May 1962). By February 1962, the Montana State Board of Examiners authorized MAC to hire an engineering firm for the all-federal Yellowstone Airport project (The Daily Inter Lake, 20 February 1962). In June that year, the Senate once again passed an appropriation of $735,000 for the project to
serve Yellowstone National Park (*The Daily Inter Lake*, 13 June 1962; *The Independent Record*, 13 June 1962). This time, both houses of Congress approved the $735,000 as a NPS contribution toward the Yellowstone Airport. The USFS agreed to make available any necessary lands. At the same time, the FAA granted MAC $646,332 for construction work of a 9,000-foot runway, taxiways, aprons, fencing, field lights, and other airport equipment (*The Independent Record*, 1 August 1962; *The Montana Standard*, 1 August 1962; *The Montana Standard*, 2 August 1962). Construction was planned to begin in May of 1962 and to be completed in the fall of 1963. The terminal would be constructed soon thereafter and scheduled to be in operation in the summer of 1964 (*The Independent Record*, 15 April 1962).

Wenzel and Company, a consultant engineering company from Great Falls, Montana, drew up preliminary plans for the runway, taxiway, terminal apron, and lighting systems in early 1963 (West Yellowstone Airport F.A.A.P, 1963). By September of that year, the plans for the terminal and maintenance buildings were completed by a team of Wenzel and Company, along with Knight and Van Teilingen, an architecture and engineering firm from Great Falls (West Yellowstone Airport Terminal and Maintenance Buildings F.A.A.P. 1963). With National Park Service funding, and given its date of construction, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy.

By the spring of 1963, an inter-agency financial agreement with the FAA was signed, allowing the bidding process for construction to begin (*The Independent Record*, 14 April 1963). Specifications called for the construction of a paved runway 8,400 feet long and 150 feet wide, that could accommodate the propjet planes used by most major airlines. Because of the altitude of 6,636 feet, the runway had to be forty-two percent longer than strips at lower levels meaning the airport would need to be built at a new location. The site of the new airport, in a separate location from the original airport built in the 1930’s, was to be 1½ mile north of West Yellowstone and a half-mile west of Highway 191 and built on 735 acres of the Gallatin National Forest. On April 15, 1962, seven construction bids were opened. They were from S. Birch & Sons Construction Company (Great Falls, Montana), Robert V. Burggraf Company (Idaho Falls, Idaho), Peter Kiewit Sons Company (Billings, Montana), Komatz Construction Company (St. Peters, Minnesota), McLaughlin Inc. (Great Falls), S.S. Mullen Company (Seattle, Washington) and Zook Brothers Construction (Great Falls). However, because of the complexity of the bids, the low bidder was not named immediately (*The Independent Record*, 15 April 1963; *The Independent Record*, 16 April 1963; *The Independent Record*, 28 May 1963; *The Independent Record*, 2 June 1963).

On April 29, 1963, Robert V. Burggraf Company of Idaho Falls, Idaho was announced as the lowest acceptable bid of $920,495. The Interior Department (through the NPS) provided forty-seven percent of the funding and the remainder came from the FAA. Completion was required by October 1, 1964 (The Independent Record, 29 April 1963). Groundbreaking took place on June 2, 1963 with Senator Mike Mansfield in attendance along with officials and speakers from the FAA, NPS, Gallatin National Forest, and MAC. More than 200 witnesses attended with Senator Mansfield, who almost single-handedly obtained the airport for Yellowstone National Park, turning the first shovel. The Senator explained the long history of federally financed jet-size airport, which took some 12 years. By this time, the opening date was projected to be the spring of 1965. Terrell C. Drinkwater, president of Western Airlines believed that the re-establishment of commercial air service to Yellowstone National Park would give a tremendous boost to Montana’s multi-million-dollar tourist business. Western Airlines planned daily service with four-engine
pressurized planes with both deluxe and air coach accommodations and since the field would be lighted for night operations, it could be used by large aircraft up to and including the jet-powered Electra IIs (The Independent Record, 29 April 1963).

Thereafter, the Montana State Board of Examiners set February 19, 1964 as the date to open bids for the Yellowstone Airport terminal building and maintenance buildings (The Montana Standard, 11 July 1963). The bids were studied and on March 2, 1964, the Board of Examiners awarded three contracts for construction of the airport terminal and maintenance buildings. These maintenance buildings still exist in their original locations outside of the current APE (though a generator house, fuel tank, and spill containment dugout, constructed circa 1980, are located within the current APE). The general contract for $158,768 went to Wallace Diteman, Inc. (Bozeman, Montana). The mechanical contract for just less than $19,000 went to Fullerton Plumbing & Heating (Hamilton, Montana). The electrical contract went to Bozeman Electric for just over $16,000. With other minor contracts, the total cost was just under $200,000 (The Independent Record, 2 March 1964; The Daily Inter Lake, 4 March 1964). In September 1964, an additional $10,000 was approved to provide more tie-down areas for the new airport (The Independent Record, 2 March 1964; The Daily Inter Lake, 23 September 1964). The tie-down area for aircraft was 250 feet wide by 1,300 feet in length with room for forty aircraft on permanent tie-down on pavement. There was also a turfed area available for free aircraft parking off pavement (The Post Register, 18 April 1965). That fall the runways, taxiways, aprons, and lights were finished and by January of the next year, the terminal building was eighty percent complete. At this time, NPS requested and received $82,000 for smokejumpers facilities at the new airport, which was set to open in May 1965 (The Independent Record, 21 January 1965; The Independent Record, 25 January 1965).

On April 18, 1965, it was announced that Big Sky Aviation Corporation, a private flying service, would manage and operate the jet-capacity airport and Harold E. Wright would be the Yellowstone airport manager. The terminal building was a modern structure of western and rustic motif of natural stone, glass, steel, and wood. On the first level were a large lobby and waiting area, three rental car booths, and a curio shop. A restaurant and cocktail lounge were planned for the future. On the two mezzanine levels, there were special offices for all the tenants and concessionaires, which included the Yellowstone Park Company. It had an office in the administration building in order to serve the public with packaged tours through Yellowstone Park in conjunction with the airlines. Western Airlines continued to hold the franchise to serve Yellowstone Airport (The Post Register, 18 April 1965; The Post Register, 8 June 1965), but as the airport neared being finished, Frontier Airlines expressed interest in establishing a route to Yellowstone Airport and applied to the Civil Aeronautics Board for a new route. They proposed using the airport as an intermediate stop between Jackson, Wyoming and Billings, Montana as an extension of their summer season Denver-Jackson flight that used a 52-passenger Conair (The Independent Record, 23 March 1965; The Billings Gazette, 24 March 1965; The Post Register, 10 June 1965).

Elaborate ceremonies were made for the opening day of the Yellowstone Airport. MAC, the sponsor, owner, and operator of the airport (the largest recreational air carrier airport in the nation) arranged the ceremonies (The Post Register, 8 June 1965). It was projected that 2,000 people would attend, including thirty newsme and a full slate of thirty dignitaries and officials of local, state, and federal governments to witness the inaugural flight by Western Airlines Lockheed Electra from Salt Lake City. Western, the only
airline so far routed into the immediate Yellowstone National Park area, proposed operating two flights daily to the airport beginning June 12 out of Los Angeles and Salt Lake City, connecting with flights from all parts of the nation. These flights marked the return of commercial air service to the nation's first and largest national park after a lapse of seventeen years. Eight Air Force F101 jet fighters and eight Montana Air National Guard F89 jets from Great Falls, Montana were slated to fly over the ceremony. Additionally, two hundred other aircraft were expected to fly in for the ceremony and displays of the airport and terminal building (The Montana Standard, 7 June 1965; The Post Register, 10 June 1965).

On June 12, 1965, the $1.3 million Yellowstone Airport was dedicated, and Yellowstone National Park entered the jet age. The program got underway at noon with the opening of public displays of the airport and terminal building and showings of National Guard, Air Force, and USFS smokejumper aircraft. A crowd of more than 1,500 attended the dedication ceremonies, which were unfortunately shortened by rainsqualls. The scheduled fly-over of Air Force jet fighters and Montana National Guard jet aircraft had to be cancelled due to the inclement weather. Gordon Hickman, chairman of MAC, served as master of ceremonies at the dedication and opened his remarks with an apology for the weather, which he joked came from outside of Montana. F.H. Christenson, who had a government star route mail contract to serve Yellowstone after opening of the original airport in 1935, made the opening speech. Federal government speakers included Deputy Secretary of the Interior John A. Carver, Jr., Colonel John Dregge, member of the Civil Aeronautics Board and Cole Morrow, director of airport services for the FAA. Assistant Regional Forester E.R. Silva informed the crowd that in July, the Forest Service in conjunction with the Bureau of Land Management (BLM), and NPS would be constructing a $200,000 forest fire control center at the north end of the airport. Included would be a smokejumper dormitory, parachute loft, and dispatch center (The Salt Lake Tribune, 13 June 1965; The Post Register, 15 June 1965).

The new commercial air service to Yellowstone Park was a hit. By July 1965, Western Airlines had doubled its traffic at Yellowstone, handling 4,339 passengers. In August, Western Airlines asked the Civil Aeronautics Board (CAB) for a service charter to add Yellowstone Airport as a gateway from such cities as Denver, Colorado, Casper, Wyoming, and Billings and Great Falls in Montana. Frontier Airlines also sought this route; however, Western Airlines was awarded the one-stop service between Denver and Billings. At the CAB hearing, the growth of winter sports was mentioned and the idea for winter service to the area was planted (The Billings Gazette, 12 August 1965).

In October 1965, the USFS issued a call for bids on the construction of an interagency fire control center at the Yellowstone Airport (The Daily Inter Lake, 20 October 1965; The Independent Record, 25 October 1965). The project amounted to a miniature version of the regional fire control depot and smoke jumper base at Missoula with a combination warehouse-office building, a 12-man dormitory, water and sewer systems, access roads, parking areas, taxiway and apron, and tanks for fire retardant mixing. The bids were opened on November 25, 1965 and Wallace Diteman, Inc. of Bozeman submitted the apparent low bid of $219,675 of the nine bids submitted (The Daily Inter Lake, 25 November 1965).

Following the construction of the fire control depot at the north end of the airport, from time to time other projects were proposed to expand the Yellowstone Airport. For instance, in 1970, an effort was made to expand the runway to 11,900 feet, long enough to handle fully loaded Boeing 737 and 727 planes
and to install an instrument landing system. The plan was to use NPS funds to match FAA funds allotted under a Federal Airport Master Plan. However, federal funding was lacking to finance the $1.4 million project. There was even talk of building an airport within the boundaries of Yellowstone Park, but that idea was quickly dashed with cold water for reasons of safety and the desire to retain the park as much as possible in a natural state and to prevent noise pollution within wilderness areas. The safety issue was based on the habit of some commercial flights to circle Old Faithful before landing at the Yellowstone Airport in the summer of 1969, there were three near misses from mid-air collisions—one involving a commercial airline. NPS Park Superintendent Jack K. Andersen also said he could not justify the runway extension because of the impact of visitors at the west entrance was "almost beyond car capability" (The Daily Inter Lake, 11 February 1970; The Independent Record, 11 February 1970; The Montana Standard, 11 February 1970).

In 1970, the issue of the size of the Yellowstone Airport terminal was brought up as well. At the time of construction, people needled MAC officials about the small size of the building, asking if they "planned on storing hay in it." Montana operated the airport because of a twenty-year contract signed in 1965, when the federal government built the airport. However, with limited state funds to improve the only airport that MAC had ever built and operated, modernization of the airport was limited to matching federal funds to provide lighting for the Yellowstone Airport (The Independent Record, 1 March 1970; The Montana Standard, 10 April 1971). In June 1972, Wenzel and Company of Great Falls was selected for the construction and upgrading of lighting at the Yellowstone Airport. The work was estimated to cost $100,000 (The Independent Record, 19 June 1972).

A lack of funding for the Yellowstone Airport continued to hamper improvements. In 1973, there was reluctance on the part of Montana’s legislature to appropriate $65,000 of state funds for the Yellowstone Airport from the state aeronautics division to match federal funds to be used mainly for meeting federal anti-hijacking safeguards. If the improvements were not made, the airport was in danger of losing "its certification as a commercial airfield and Western and Frontier Airlines probably would stop serving the Yellowstone National Park gateway." As one paper put it, "if West Yellowstone residents want continued air service, they may have to cough up funds to improve their airport or put wings on their snowmobiles," (The Montana Standard, 3 March 1973; The Independent Record, 4 March 1973). Eventually, the state appropriated $40,000 to construct a crash fire building (Great Falls Tribune, 22 May 1973).

Money troubles continued in 1974 and for years thereafter. In 1974, the only state-owned air carrier port in Montana was open five months and had six commercial flights each day. Nonetheless, financial reports indicated that it barely broke even that season. Additionally, the Yellowstone Airport manager warned that the airport might have to close during the 1975 season unless it received $195,000 to seal-coat the runway (Great Falls Tribune, 24 December 1974).

Many thought the airport should be opened on a year-round basis, even though Western and Frontier Airlines seemed uninterested in year-round scheduled flights. They included Ski Yellowstone, a proposed recreational complex, Yellowstone Park Company, and many residents and community businessmen. To do so, the major costs included projects to winterize and heat the terminal building and for equipment to remove the heavy snowfall from the runway. MAC owned and operated eleven airports in Montana, but
ten of them were for emergency and general aviation. The Yellowstone Airport was the only one used by commercial airlines, such as Frontier and Western. However, MAC did not have the estimated $2.78 million in capital expenditures and an additional $555,000 in operational costs to operate the Yellowstone Airport year-round in order to meet business, tourism, freight, mail, and medical needs. Help was sought from western district congressman Max Baucus, who explored the possibilities of securing a federal grant to supply the needed funding. The State Board of Aeronautics also indicated its willingness to help pay for a study to find out if there were enough tourists to justify operating Yellowstone Airport in the winter (Great Falls Tribune, 20 May 1976; The Montana Standard, 20 May 1976; The Independent Record, 20 May 1976; The Montana Standard, 18 July 1976; The Montana Standard, 23 July 1976).

In 1978, state and federal funding for $690,000 was approved for improvements to the Yellowstone Airport with over eighty-three percent coming from the federal government (Great Falls Tribune, 27 December 1978). The monies were used in 1980 to repair the airport's main runway in July and August that year. Western Airline cancelled its flights while the runway was closed but Frontier Airlines agreed to land on the airport's taxiway during this period (Great Falls Tribune, 15 May 1980). The next year, an additional $161,036 was expended for runway and taxiway lighting repairs because gophers had eaten away insulation on underground wiring for the lighting system. (Great Falls Tribune, 27 September 1981). Also in 1980 a generator building (F2) and 500 gallon diesel fuel tank (F3) were installed on the airport grounds to keep the runway and taxiway lights running in the event of a power outage.

The year 1979 was the busiest year ever at the Yellowstone Airport. That year, 23,563 scheduled passengers were boarded and there were four daily round trips, two each to Salt Lake City and Denver. However, starting in 1983, business declined to just 15,000 passengers and there were only two daily round-trip flights to Yellowstone. Three reasons appeared to account for the decline: a decline in foreign visitors caused by the devaluation of foreign currency against the strength of the U.S. dollar, lack of consistent airline service to Yellowstone, and the lack of a solid marketing plan for the Yellowstone Airport area. This meant reduced income for car rental businesses, private aviation service, the gift shop, and the entire community (Great Falls Tribune, 4 August 1984). Airport ownership came into question when MAC's contract was set to expire. In 1987, an amendment was attached to the main House appropriations bill, directing the Commerce Department to transfer ownership of the 25-year old airport to the Town of West Yellowstone or another local public authority willing to operate the airport. If no public entity was willing to take over, the legislature proposed closing the airport (Great Falls Tribune, 27 July 1988).

The airport did not close, and MAC continued to own and operate the Yellowstone Airport after 1987. In the spring of that year, Western Airlines merged with Delta Airlines and became known as Delta (Great Falls Tribune, 29 March 1987). Thereafter, Skywest Airlines, operating as Delta Connection, with Embraer EMB-120 Brasilia turboprops, served the airport on a seasonal basis. In June 2015, Skywest upgraded its seasonal Delta Connection service to Yellowstone Airport with Canadair CRJ-200 regional jet service, thus marking the first time the airport has had jet service in nearly thirty years.
4.0 Methods
On November 3, 2016, HAI conducted the Class III Cultural Resource Inventory under intermittently windy, cool, and cloudy weather conditions. Shane Hope surveyed the 8.7-acre APE (see Figure 1) using transects spaced no greater than 30m apart. Ground surface visibility ranged from 50 to 99 percent (see Figures 2, 3, and 4). No subsurface testing was performed in the course of this project survey.

Prehistoric sites are defined by the presence of artifacts (beads, pottery, lithics, fire cracked rock, bone) totaling five or more items within any 30 meter diameter or the presence of any prehistoric feature (ring, arc, or cairn). The presence of less than five non-diagnostic prehistoric artifacts within a 30-meter diameter is identified as an isolated find (IF). No prehistoric cultural materials were observed during the current investigations.

Historic resource sites must be 50 years or older, except under special circumstances of exceptional historic value. Any feature (i.e., foundation, structure, sheepherder’s monument) and/or five or more artifacts (i.e., glass, metal, or ceramics) within a 30-meter diameter define them. The investigation of historic sites consisted of a physical analysis of all standing structures and all historic archaeological features. Two previously unrecorded sites, the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon (24GA1981) were documented during the current inventory.

The sites were recorded on SHPO Cultural Properties Forms. Complete legal descriptions (1/4, 1/4, section, township, range, county, and Universal Transverse Mercator [UTM] coordinates) were determined, along with the USGS topographic map reference. UTM coordinates were recorded with Trimble GPS units. This information was then compared to the surrounding topography and field maps for accuracy. The sites were then plotted on USGS 7.5’ topographic maps.

Photographs were taken of features and site overviews. Detailed site maps of the sites showing all feature locations and site boundaries were completed. Identified features were documented and plotted on sketch maps that were drawn to scale. The site boundaries, the distribution of features, and the feature size were determined using a combination of pacing, tape measure, hand held compass and GPS units.

**Evaluative Criteria**

The methods used to provide recommendations regarding NRHP eligibility follows the guidelines established by the Department of the Interior. Site evaluations were conducted using existing guidance from the Montana SHPO, the National Register Criteria (36 CFR 60.4), and National Park Service National Register Bulletins. For a property to qualify for listing in the NRHP, it must be “associated with an important historic context and retain historic integrity of those features necessary to convey its significance” (National Park Service [NPS] 1997:3). Properties usually considered for NRHP evaluation are 50 years of age or older. Newer properties can be considered for NRHP listing, but they must meet additional eligibility considerations.

Of particular importance are National Register Bulletins 15 and 16. According to these bulletins, a property must possess historic significance and integrity to be listed on the NRHP. According to Bulletin 15, the criteria by which sites are determined significant will be as follows:
**Criterion A:** Properties associated with events that have made a significant contribution to the broad pattern of our history.

**Criterion B:** Properties associated with the lives of persons significant in our past.

**Criterion C:** Properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

**Criterion D:** Properties that have yielded, or may by likely to yield, information important to prehistory or history. When assessing eligibility for inclusion to the NRHP, prehistoric site in the Northern Plains are usually evaluated under Criterion D.

Finally, “a property must not only be shown to be significant under the National Register Criteria, but it also must have integrity” to qualify for listing in the NRHP (NPS 1997:44) and “The retention of specific aspects of integrity is paramount for a property to convey its significance” (NPS 1997:44). There are seven aspects of integrity, of which a property “will always possess several, and usually most, of the aspects” in order to retain its historic integrity (NPS 1997:44). The seven aspects of integrity are: location, design, setting, materials, workmanship, feeling, and association. These aspects of integrity are defined as follows:

Location “is the place where the historic property was constructed or the place where the historic event occurred.”

Design “is the combination of elements that create the form, plan, space, structure, and style of a property.”

Setting “is the physical environment of a historic property.”

Materials “are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.”

Workmanship “is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.”

Feeling “is a property’s expression of the aesthetic or historic sense of a particular period of time.”

Association “is the direct link between an important historic event or person and a historic property” (NPS 1997:45).
5.0 Inventory Results

Two historic sites are located within the study area (See Figures 1 and 5). The historic sites consist of the Yellowstone Airport Terminal (24GA1958), which encompasses the airport terminal, generator house, fuel tank, and a dugout, and the Yellowstone Airport beacon tower (24GA1981). These properties make up all the historic or cultural properties that were identified during the current CRI within the APE and they were documented and evaluated for NRHP eligibility.

24GA1958

The Yellowstone Airport Terminal site (Figure 5) consists of the airport terminal (F1), a generator house (F2), a concrete fuel tank (F3), and a fuel spill containment dugout (F4). The terminal is a simple vernacular architectural expression of western “modernism” with prevalent use of un-coursed ashlar natural stone fabric, large numbers of tall-banded vertical windows and brown stained rustic board and batten wood siding with functional interior space and conventional airport seating. The terminal’s windows offer passengers expansive landscape views, while providing, at the same time, natural light for the large high ceiling interior lobby and waiting area, rental counters, and restaurant.

Feature 1 is the Yellowstone Airport Terminal building (Figures 6, 7, 8, and 9). This structure measures 161’8’ NE by SW and 60’ NW by SE. The outside elevations are composed from high tall-banded vertical windows, un-coursed ashlar stone fabric, and brown stained rustic board and batten wood siding. There are large glass doors on the SE and NW elevations of the building. The roof is shed like and slopes from the NW to the SE and the structure sits on a concrete foundation. The terminal design (approved by the National Park Service) displays modern stylings combined with western rustic elements (Western Modernism). Bids for the terminal were received in 1964 and the structure was opened for service in 1965 (for a detailed history of the airport please refer to Section 3.4 Yellowstone Airport History, pages 16-23). The airport terminal has a canted overhang roof supported by steel beams that, at the time of construction, probably gave the arriving contemporary passenger a feeling of strength, functionality, and efficiency. Understandably, the Yellowstone Airport’s branding focused on the airport’s high elevation and significance as Yellowstone National Park’s west entrance. With National Park Service funding through the Department of Interior and given its date of construction in 1964 and 1965, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy. During the 1940s and early 1950s, the National Park Service (NPS) was criticized for neglect of the park system. In 1955, NPS managers made a conscious decision to replace the rustic style of park facilities constructed in the 1930s with a new more streamlined western modern style of design. Called “Mission 66,” it was a ten-year National Park Service (NPS) program intended to modernize NPS infrastructure facilities (visitor centers, housing, interpretive centers, etc.) in time for the fiftieth anniversary of the establishment of the Park Service in 1966. These infrastructure facilities included mainly building structures and not features such as airport runways, taxiways, aprons, or other airside facilities. The simpler, cleaner design philosophy was faster and less expensive to implement than refurbishing older rustic facilities and its public image fitted with the idea of a “new era” in park service. Sarah Allaback, author of Mission 66 Visitor Centers: The History of a Building Type, called it “Park Service Modern.” This western modern architectural style was prevalent in the postwar period and Mission 66 introduced that design model to the national park system. The modernist architecture utilized easily available and inexpensive materials as well as laborsaving
techniques that were developed by the military during wartime. The Mission 66 architectural design adopted these techniques and incorporated spacious interiors and efficiently provided for the separation of the public and administrative spaces while allowing the assemblage of materials to become the larger focus of the architectural designs.

Figure 5 - Sketch Map of 24GA1958
Figure 6 - The Yellowstone Airport Terminal building (F1), view to the north

Figure 7 - The Yellowstone Airport Terminal building (F1), view to the south
Figure 8 - Airport Terminal Lobby Interior, view to the northeast

Figure 9 - Airport Terminal Lobby Interior, view to the southwest
Feature 2 is the small generator house (Figure 10). This house is composed from simple cinderblock construction and measures 12’ NE by SW and 15’ NW by SE and is 10’ tall with a shed roof. There is a steel door in the NW elevation of the structure and a screened off window in the NE elevation. The shed sits on a concrete foundation and houses a diesel generator motor. This structure and motor were installed circa 1980 to ensure the runway and taxiway lighting systems would remain functional during a power outage. This feature was not part of the original airport construction and does not contribute to the NRHP eligibility of the overall site.

Figure 10 - Generator House (F2), view to the south.
Feature 3 is a large concrete fuel tank (Figure 11). This container holds a maximum capacity of 500 gallons and is designed to provide diesel for Feature 2, the generator house. The tank measures 6’ NE by SW and 15’ NW by SE and is 5’ tall and sits on a concrete platform that measures 1’ thick. There is a pipe connecting Features 2 and 3. This diesel fuel tank was installed in circa 1980 as provide fuel to the generator house (Feature 2). This feature was not part of the original airport construction and does not contribute to the NRHP eligibility of the overall site.

Figure 11 - Concrete Fuel Tank (F3), view to the northwest.
Feature 4 is a rectangular shaped dugout that has been mostly filled in with dirt and gravel (Figure 12). The dugout is 12’ NE by SW and 20’ NW by SE and is bordered by sections of concrete. This feature is a containment area that was constructed sometime after the construction of the generator house and fuel tank (post 1980) in the event of rupture of the adjacent fuel tank (Feature 3). While it is believed that some level of government administration (MDT, Department of Environmental Quality, or some other agency) requested the construction of this containment area, no documentation can be found as to the author of the request or the official date of construction (Eickman 2019). This feature was not part of the original airport construction and does not contribute to the NRHP eligibility of the overall site.

Figure 12 - Filled in Dugout (F4), view to the southeast.
Integrity
The Yellowstone Airport Terminal site retains all seven aspects of integrity. The property has not been moved from its original location, the exterior design of the building has not been altered, the secluded high mountain setting has not been altered, the physical materials are mostly intact, and the particular Mission 66 program workmanship and association is evident.

Feature 1 contributes to the site’s eligibility as an original and largely unmodified structure. Features 2, 3, and 4 do not contribute as they were added and then altered after 1980 and therefore do not contribute to the site’s NRHO eligibility. Feature 5 was constructed at the same time as the Yellowstone terminal: however, this beacon tower is of a vernacular construction style and does not exhibit any architectural characteristics or attributes that contribute to the site’s NRHP eligibility as a Mission 66 property.

Significance and Recommendation
The Yellowstone Airport Terminal site is recommended eligible for listing to the NRHP under Criteria A and C with Features 1 (F1) contributing to this eligibility. After World War II the growth of the American middle class, the prevalence of the consumer economy, the technological advances in aviation, and the rekindled interest in nature lead to a boom in visitation to western parks, and none so more than Yellowstone Park. Located at the western entrance to the National Park, the Yellowstone Airport became a significant economic addition for the National Park Service, Gallatin County, and the Town of West Yellowstone. Groundbreaking took place on June 2, 1963 with Senator Mike Mansfield in attendance along with officials and speakers from the FAA, NPS, Gallatin National Forest, and MAC. More than 200 witnesses attended with Senator Mansfield, who almost single-handedly obtained the airport for Yellowstone National Park, turning the first shovel. The Senator explained the long history of the federally financed jet-size airport, which took some 12 years. By this time, the opening date was projected to be the spring of 1965. Terrell C. Drinkwater, president of Western Airlines believed that the re-establishment of commercial air service to Yellowstone National Park would “give a tremendous boost to Montana’s multi-million dollar tourist business.” Western Airlines planned daily service with four-engine pressurized planes with both deluxe and air coach accommodations and since the field would be lighted for night operations, it could be used by large aircraft up to and including the jet-powered Electra IIs. The new commercial air service to Yellowstone Park was a hit. By July 1965, Western Airlines had doubled its traffic at West Yellowstone, handling 4,339 passengers and in August of that year, Western Airlines asked the Civil Aeronautics Board (CAB) for a service charter to add Yellowstone Airport as a gateway from such cities as Denver, Colorado, Casper, Wyoming, and Billings and Great Falls in Montana. While the ridership numbers of those coming through the Yellowstone Airport Terminal has ebbed and flowed over its history, the airport’s economic significance and its association with Yellowstone National Park tourism in the 1960’s is substantial. For these reasons, the Yellowstone Airport is recommended eligible under Criterion A.

The Yellowstone Airport terminal building (F1) illustrates the distinctive characteristics of the Mission 66 architectural style of western modernism. The Yellowstone Airport terminal building is a simple vernacular architectural expression of western modernism with prevalent use of un-coursed ashlar natural stone fabric, large numbers of tall-banded vertical windows and brown stained rustic board and batten wood siding with functional interior space and conventional airport seating. The airport’s branding focused on
the airport’s high elevation and significance as Yellowstone National Park’s west entrance. With significant National Park Service funding through the Department of Interior, and given its date of construction, the airport terminal design can easily be associated with the Park Service’s Mission 66 program and policy. The terminal is unique in its function among Mission 66 buildings as an airport and it is one of, if not the only, example that has not been significantly altered since its construction. While the interior has undergone significant remodeling at different times, most notably in response to the post 9-11 Traffic Security Administration (TSA) requirements, as well as to accommodate rental cares, helicopter tours, and Life Flight business within the building, and also in the upstairs offices, the café, and the addition of new bathroom facilities, much of the feel of the original Mission 66 style is evident in the lobby of the terminal. Outside of resurfacing the top of the roof, the exterior has undergone minimal alteration. For these reasons, the Yellowstone Airport Terminal Site is recommended eligible under Criterion C.

24GA1981
The site is the Yellowstone Airway beacon tower (Figure 13). The tower is comprised from 3” pieces of angle steel bolted together at each connection point. The base of the tower measure 12’ square and is orientated NE to SW. The tower is 51 feet tall and has a small platform at the top measuring approximately 4 feet square, which houses the beacon apparatus. A steel ladder without a safety cage is attached to the SE elevation and gives access from the ground to the platform (Figure 14). This beacon tower was relocated to the airport grounds at the same time as the construction of 24GA1958 (the Yellowstone Airport Terminal), circa late 1964 or early 1965, though it is not clear where the tower originated. Jon Axline, historian for the Montana Department of Transportation, suggests that the tower may have been relocated from the old West Yellowstone Airport, which would make logistical and monetary sense given the relative proximity of the two airport sites. In addition, Mr. Axline believes the tower appears to be of the same construction style as those constructed in the 1930s (Axline 2019). While the beacon tower is likely of the original construction style as it was pre-relocation, the rotating and lighted beacon equipment has gone through numerous changes as electrical equipment has expended its useful life. While records of the electrical modifications are not available, airport staff noted that modifications have been made as recently as, approximately, 2009 (Eikman 2019).

Integrity
The Yellowstone Airport Beacon retains a high level of integrity. Though the tower was relocated to this location in the 1960’s it retains integrity of location as its period of significance includes the site’s current location. The site also retains integrity of setting, location, and association as a nighttime airway beacon. Also, even though the tower was relocated to its current location the integrity of workmanship, design, and materials are all sufficiently intact.
Figure 13 – Yellowstone Airport Beacon (24GA1981), sketch map.
Figure 14 - Beacon Tower, view to the north.

Significance and Recommendation
According to the Sentinels of the Airways: Montana’s Historic Airway Beacon System multiple property documentation form as part of historic context for Montana Aviation, The Airway Beacon System in Montana, 1934-1979, this property type is that of a relocated Montana airway beacon. The following information concerning this property type and the NRHP evaluation methods come directly from the multiple property documentation form referenced above:

National Register Criterion A: An airway beacon may be eligible for listing in the National Register of Historic Places under Criterion A if it is:
Associated with the FAA decommissioning process, establishment of the Montana Aeronautics Commission’s role in owning and maintaining beacons after 1966, and the relocation of beacons to airports, landing fields, and other locales for directive uses. The importance of beacons to rural navigation is illustrated by their numbers across Montana by mid-century. The improvement of radar and other navigational aids, however, resulted in the CAA to begin decommissioning beacons nationwide in 1951, a process that continued under the auspices of the FAA (created in 1958) into the 1970s. In Montana, the assessment process began in the early 1960s. Many of these beacons were donated by the FAA, to the MAC, local governments, and other recipients for use. A few beacons and towers were repurposed, but most were put back to work in their original capacity.

National Register Criterion C: An airway beacon in Montana may be eligible for listing in the National Register under Criterion C if it:

Was moved to its new location within the period of significance, and has therefore, acquired significance related to its relocated position. With the relocation of beacons and towers beginning in 1951 and accelerating through the mid-late 1960s, many assumed similar roles but in different locations. The relocated beacons often gained a second life for use at publicly-owned airports, landing fields, and other locations, indicating their value as a navigation tool for pilots was recognized across the state.” (Axline and Hampton, 2019)

With these significance guidelines in place it is recommended that the Yellowstone Airport Beacon site (24GA1981) is eligible for listing under Criterion A and C.

6.0 Summary and Recommendations

A Class I file search did not identify any previously recorded archaeological sites and the field survey identified two previously unrecorded historic sites within the APE (Figure 1). The newly identified sites are the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon (24GA1981). These sites are both recommended eligible for listing to the NRHP. Site 24GA1958 is recommended eligible under Criteria A and C with Feature 1 (the airport terminal) contributing to site’s significance. Features 2, 3, and 4 do not contribute as they were added and then altered after 1980 and therefore do not contribute to the site’s NRHP eligibility. A significant remodel, or a total demolition and reconstruction, of the airport terminal (F1) will adversely effect the NRHP status and integrity of the site. If a remodel or demolition are suggested for this site as part of any future project it is recommended that the terminal is subjected to a Historic American Buildings Survey (HABS) level recording and informational preservation to mitigate the effects of the project on the site. Features 2-5 do not contribute to the site’s eligibility status and may be altered or removed without mitigating consideration.

Site 24GA1981 is recommended eligible under Criteria A and C. If the beacon is proposed to be moved or deconstructed, further mitigation options will need to be discussed with the Montana SHPO and the MDT. These options may include, but not limited to, the completion of a NRHP nomination form, or be subjected to HABS/Historic American Engineering Record (HAER) level recording.
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Yellowstone Airport F.A.A.P

Yellowstone Airport Terminal and Maintenance Buildings F.A.A.P.

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<td>Shane Hope and Anthony Godfrey</td>
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MT SHPO USE ONLY
Eligible for NRHP: ☐ yes ☐ no
Criteria: ☐ A ☐ B ☐ C ☐ D
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Evaluator:
The Yellowstone Airport Terminal is a simple vernacular architectural expression of western “modernism” with prevalent use of un-coursed ashlar natural stone fabric, large numbers of tall-banded vertical windows and brown stained rustic board and batten wood siding with functional interior space and conventional airport seating. Once inside, airport’s windows offered passengers expansive landscape views, while providing, at the same time, natural light for the large high ceiling interior lobby and waiting area, rental counters, and restaurant. The airport has a canted overhang roof supported by steel beams that, at the time of construction, probably gave the arriving contemporary passenger a feeling of strength, functionality, and efficiency. Understandably, the airport’s branding focused on the airport’s high elevation and significance as Yellowstone National Park’s west entrance. With National Park Service funding, and given its date of construction, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy.

Feature 1 is the Yellowstone Airport Terminal building. This structure measures 161’8” NE by SW and 60’ NW by SE. The outside elevations are composed from high tall-banded vertical windows, un-coursed ashlar stone fabric, and brown stained rustic board and batten wood siding. There are large glass doors on the SE and NW elevations of the building. The roof is shed like and slopes from the NW to the SE and the structure sits on a concrete foundation. The terminal design (approved by the National Park Service) displays modern stylings combined with western rustic elements. Bids for the terminal were received in 1964 and the structure was opened for service in 1965. The airport terminal has a canted overhang roof supported by steel beams that, at the time of construction, probably gave the arriving contemporary passenger a feeling of strength, functionality, and efficiency. Understandably, the Yellowstone Airport’s branding focused on the airport’s high elevation and significance as Yellowstone National Park’s west entrance. During the 1940s and early 1950s, the National Park Service (NPS) was criticized for neglect of the park system. In 1955, NPS managers made a conscious decision to replace the rustic style of park facilities constructed in the 1930s with a new more streamlined western modern style of design. Called “Mission 66,” it was a ten-year National Park Service (NPS) program intended to modernize NPS infrastructure facilities (visitor centers, housing, interpretive centers, etc.) in time for the fiftieth anniversary of the establishment of the Park Service in 1966. These infrastructure facilities included mainly building structures and not features such as airport runways, taxiways, aprons, or other airside facilities. The simpler, cleaner design philosophy was faster and less expensive to implement than refurbishing older rustic facilities and its public image fitted with the idea of a “new era” in park service. Sarah Allaback, author of Mission 66 Visitor Centers: The History of a Building Type, called it “Park Service Modern.” This western modern architectural style was prevalent in the postwar period and Mission 66 introduced that design model to the national park system. The modernist architecture utilized easily available and inexpensive materials as well as laborsaving
techniques that were developed by the military during wartime. The Mission 66 architectural design adopted these techniques and incorporated spacious interiors and efficiently provided for the separation of the public and administrative spaces while allowing the assemblage of materials to become the larger focus of the architectural designs.

Feature 2 is the small generator house. This house is composed from simple cinderblock construction and measures 12’ NE by SW and 15’ NW by SE and is 10’ tall with a shed roof. There is a steel door in the NW elevation of the structure and a screened off window in the NE elevation. The shed sits on a concrete foundation and houses a diesel generator motor. This structure and motor were installed circa 1980 to ensure the runway and taxiway lighting systems would remain functional during a power outage. This feature was not part of the original airport construction and does not contribute to the NRHP eligibility of the overall site.

Feature 3 is a large concrete fuel tank. This container holds a maximum capacity of 500 gallons and is designed to provide diesel for Feature 2, the generator house. The tank measures 6’ NE by SW and 15’ NW by SE and is 5’ tall and sits on a concrete platform that measures 1’ thick. There is a pipe connecting Features 2 and 3. This diesel fuel tank was installed in circa 1980 as provide fuel to the generator house (Feature 2). This feature was not part of the original airport construction and does not contribute to the NRHP eligibility of the overall site.

Feature 4 is a rectangular shaped dugout that has been mostly filled in with dirt and gravel (Figure 12). The dugout is 12’ NE by SW and 20’ NW by SE and is bordered by sections of concrete. This feature is a containment area that was constructed sometime after the construction of the generator house and fuel tank (post 1980) in the event of rupture of the adjacent fuel tank (Feature 3). While it is believed that some level of government administration (MDT, Department of Environmental Quality, or some other agency) requested the construction of this containment area, no documentation can be found as to the author of the request or the official date of construction¹ (Eickman 2019). This feature was not part of the original airport construction and does not contribute to the NRHP eligibility of the overall site.

¹ Personal communication with Travis Eickman, Senior Airport Engineer with Morrison-Maierle on April 10, 2019.
HISTORY OF PROPERTY

By the end of World War I, aircraft design and engine development had progressed to a remarkable degree of efficiency with pilots no longer flying on a "wing and a prayer" and in the mid-to-late 1920s, the commercial air business began to bloom in Montana. By 1927, National Parks Scenic Airways, located in Billings, Montana, began flying passengers to numerous Montana destinations, such as Helena, Great Falls, Bozeman, and as far as Cody, Wyoming and Lewiston, Idaho. Soon thereafter, National Parks Airways acquired an airmail contract with the U.S. Post Office, becoming Montana's first scheduled airline to receive such a contract. On August 1, 1928, National Parks Airways inaugurated airline service between Salt Lake City, Utah and Great Falls, Montana under this contract.²

In 1932, West Yellowstone residents founded the West Yellowstone Commercial Club to start securing funds for the construction of local airport and to file successfully for a special use application with the U.S. Forest Service (USFS). The permit expired; however, in 1934 it was reissued to Gallatin County. In autumn of 1933, the USFS, specifically the Targhee National Forest, contributed a 130-acre tract of land directly west of the city limits bounded by Iris Street for the airport. Local labor and private capital was initially used to clear the standing timber, amounting to over one half million trees. However, due to mounting costs, the work was stopped until the Civil Works Administration (CWA) and airport division of the Federal Emergency Relief Administration (FERA) contributed roughly $147,000 to finish preparing the land. The runway was leveled using gravel removed from a large pit between the two runways.³ The entire project required a year and half to construct the runway and the modern new air terminal in its primitive surrounding of tall pines.⁴ Meanwhile, in August 1933, Scenic Airways secured a contract to deliver winter mail to the Town of West Yellowstone three times a week.⁵

The Yellowstone Airport was dedicated on June 22, 1935 and attended by thousands from major cities in the Rocky Mountain area to witness the advent of transport and airmail service to a national park. The celebration featured maneuvers of a fleet of army planes from the army and naval base at Seattle, Washington and airplane trips over Yellowstone and Grand Teton National Parks.⁶ At the close of the ceremony, a National Parks Airways plane flew out of the airport with 12,000 special first day letters. Copper souvenirs were attached to all letters contained in the initial airmail consignment out of the Yellowstone Airport.⁷

By June 1935, National Parks Airways provided Utah cities with early morning and afternoon flights to the famous western gateway of Yellowstone Park. The new service, the first operation of any scheduled airline to a national park gateway, also provided one daily flight to West Yellowstone from Butte, Montana, except Saturdays and Sundays, and two return flights. The airline had installed radio equipment in its hangar to accommodate the airline's operations. Additionally, the U.S. Post Office authorized regularly scheduled daily flights to the newly constructed Yellowstone Airport by National Parks Airways, making it the highest elevation airport located in the United States to be serviced by mail and transport airplanes.⁸

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³ "Building an Airport in West Yellowstone" West Yellowstone Historic Center, www.yellowstonehistoriccenter.org/.
⁴ "West Yellowstone Airport Dedicated as Leaders Meet" 23 June 1935 The Salt Lake Tribune [Salt Lake City, Utah].
⁵ "West Yellowstone Airport Dedicated as Leaders Meet" 23 June 1935 The Salt Lake Tribune.
⁶ "Building an Airport in West Yellowstone" West Yellowstone Historic Center, www.yellowstonehistoriccenter.org/.
⁷ "Airport Opening at Yellowstone to Draw Crowd" 22 June 1935 The Salt Lake Tribune.
⁸ "West Yellowstone to Be on Air Line" 11 June 1935 The Ogden Standard-Examiner [Ogden, Utah]; "Airport Opening at Yellowstone to Draw Crowd" 22 June 1935 The Salt Lake Tribune; "National Parks Ships Will Land Near Park" 20 July 1935 Montana Butte Standard [Butte, Montana].
A year later, a celebration at the Yellowstone Airport marked and commemorated the establishment of the airport, which had been grubbed from solid timber to provide an excellent landing field. Governors from Montana, Idaho, Wyoming and Utah attended and spoke during the morning's program and celebrated recognition of the port as a regular stop on an air route and the start of the first direct air service to a national park. The Yellowstone Airport cost approximately $2,000 and was only about eighty percent complete. Additionally that season, the National Parks Airways began to operate a scenic air tour of Yellowstone and Grand Teton National Parks as an "outstanding feature of its vacation service." The tours originated and terminated at the Yellowstone Airport and started on June 10, 1937.

However, on August 1, 1937, Western Air Express acquired and took over the operations of National Parks Airways. This merger increased service to Las Vegas and the west coast airports like Los Angeles and San Diego. A year later, Western Air showed a marked increase in passenger service, which officials attributed to daily air service to Glacier and Yellowstone National Parks. They even promoted and provided a one-day fishing tour to Yellowstone Park. A sportsman could now fly from Los Angeles to the Yellowstone Airport from where the fly-fisherman could be fully equipped with tackle, bait, motor boat and guide, and driven to the famous trout fishing waters of Hebgen Lake and the Madison River. By 1940, Yellowstone Park air traffic was at an all-time high and as a result, Western Air Express furthered a new scenic excursion. The airline inaugurated a route that took the passenger from Salt Lake City to the Yellowstone Airport following the Snake River, crossing the edge of Jackson Lake and the Tetons and passing over Old Faithful geyser. However, with the bombing of Pearl Harbor on December 7, 1941 and the coming of World War II, service to the Yellowstone Airport was deemed "non-essential" due to the war effort.

Following World War II, Yellowstone Park tried to return to normalcy but had difficulties during the postwar period. While visitation was up because the American public wanted a change of scenery and national parks were among the places they traveled to looking for it, the Northern Railroad found Yellowstone Park tourism less profitable than it had been in earlier times and decided to give up re-establishing the former pattern of passenger traffic to the park. Air service was thereafter seen as a substitute for rail service as a prime carrier for continuing tourist traffic into the park.

In June 1946, Yellowstone National Park was linked once more to the nation's airline network, when Western Air Lines began landing two flights daily at the Yellowstone Airport. One flight was from Los Angeles to Great Falls with a stop at West Yellowstone and the other was a one and three-fourths hour direct flight from Salt Lake City to the airport. However, in March 1948, changes in civil air regulations prohibited Western Air Lines from continuing commercial summer service between 10 a.m. and 4 p.m. because of "local wind and runway conditions." Apparently, the trees at the end of the runway had grown to be dangerously tall. The closest airport

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10 "Air Service to Park Will Start June 10" 31 May 1937 The Independent Record [Helena, Montana].
11 "Western Air Express Takes Over National Parks Today: Will enlarge Plane Service" 1 August 1937 The Independent Record.
12 "Western Air Shows Marked Increase in Passenger Business" 12 July 1938 The Independent Record.
13 "Blood is Guest on First Flight" 18 June 1940 The Ogden Standard-Examiner; "Yellowstone Air Traffic Up" 16 August 1940 The Post-Register [Idaho Falls, Idaho].
14 "Building an Airport in West Yellowstone" West Yellowstone Historic Center, www.yellowstonehistoriccenter.org/.
16 "WAL Links S.L., Yellowstone Park" 17 June 1946 The Salt Lake Tribune.
that could bring commercial passengers to Yellowstone National Park was at Bozeman, Montana. The commercial service suspension came at a time when visitation to Yellowstone National Park had reached over 1 million for the first time with the west entrance being the most popular gateway. Because of the suspended service, only twenty-two visitors arrived by plane that year.\(^{17}\)

Although commercial service was suspended at the Yellowstone Airport, private planes continued to use the airport even after 1948. Meanwhile, in 1951, NPS and the Civil Aeronautics Administration and Western Airlines officials met to consider re-establishment of commercial service to serve the park.\(^{18}\) Transformation of that idea came in September 1958 when Senator Mike Mansfield (D-Montana) and several Interior Department agencies began to lobby for new airport at West Yellowstone to serve Yellowstone Park and adjoining areas in Montana, Idaho, and Wyoming. The problem was appropriating the money and dividing responsibilities between the federal agencies and the Montana Aeronautics Commission (MAC). At that point, it was decided that the USFS would act as the contracting agency and joint sponsor for construction of the new airport on land it administers, the Civil Aeronautics Administration (CAA) and the National Park Service (NPS) would share the construction costs and MAC would maintain and operate the airport.\(^{19}\)

By 1961, however, plans changed. At that time, MAC has instead accepted sponsorship of the construction and operation of the new Yellowstone Airport and requested federal funding for the project. Construction planning was put in charge of the Federal Aviation Agency (FAA), NPS, and the USFS.\(^{20}\) Funding came in September when a Senate Committee approved $735,000 for construction of the new airport with a 7,000-foot runway, long enough to handle commercial flights. State funds would be used to administer the construction and operation of the airport.\(^{21}\) Nonetheless, the House of Representatives rejected the appropriation. It was hoped that the project would be included in the regular 1963 fiscal year budget.\(^{22}\) President John F. Kennedy did include funding in his budget that year: $165,000 for a new terminal building, utilities, landscaping, etc. and $570,000 for construction of the runway, including the runways, taxi strips, aprons, and service roads.\(^{23}\) By February 1962, the Montana State Board of Examiners authorized MAC to hire an engineering firm for the all-federal Yellowstone Airport project.\(^{24}\) In June that year, the Senate once again passed an appropriation of $735,000 for the project to serve Yellowstone National Park.\(^{25}\) This time, both houses of Congress approved the $735,000 as a NPS contribution toward the Yellowstone Airport. The USFS agreed to make available any necessary lands. At the same time, the FAA granted MAC $646,332 for construction work of a 9,000-foot runway, taxiways, aprons, fencing, field lights,
and other airport equipment.\textsuperscript{26} Construction was planned to begin in May 1962 and to be completed in the fall of 1963. The terminal would be constructed soon thereafter and scheduled to be in operation in the summer of 1964.\textsuperscript{27}

Wenzel and Company, a consultant engineering company from Great Falls, Montana, drew up preliminary plans for the runway, taxiway, terminal apron, and lighting systems in early 1963.\textsuperscript{28} By September of that year, the plans for the terminal and maintenance buildings were completed by a team of Wenzel and Company, along with Knight and Van Teylingen, an architecture and engineering firm from Great Falls.\textsuperscript{29} With National Park Service funding, and given its date of construction, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy.

By the spring of 1963, an inter-agency financial agreement with the FAA was signed, allowing the bidding process for construction to begin.\textsuperscript{30} Specifications called for the construction of a paved runway 8,400 feet long and 150 feet wide that could accommodate the jet planes used by most major airlines. Because of the altitude of 6,636 feet, the runway had to be forty-two percent longer than strips at lower levels. The site of the new airport was to be 1½ mile north of West Yellowstone and a half-mile west of Highway 191 and built on 735 acres of the Gallatin National Forest. On April 15, 1962, seven construction bids were opened. They were from S. Birch & Sons Construction Company (Great Falls, Montana), Robert V. Burggraf Company (Idaho Falls, Idaho), Peter Kiewit Sons Company (Billings, Montana), Komatz Construction Company (St. Peters, Minnesota), McLaughlin Inc. (Great Falls), S.S. Mullen Company (Seattle, Washington) and Zook Brothers Construction (Great Falls). However, because of the complexity of the bids, the low bidder was not named immediately.\textsuperscript{31}

On April 29, 1963, Robert V. Burggraf Company of Idaho Falls, Idaho was announced as the lowest acceptable bid of $920,495. The Interior Department provided forty-seven percent of the funding and the remainder came from the FAA. Completion was required by October 1, 1964.\textsuperscript{32}

Groundbreaking took place on June 2, 1963 with Senator Mike Mansfield in attendance along with officials and speakers from the FAA, NPS, Gallatin National Forest, and MAC. More than 200 witnesses attended with Senator Mansfield, who almost single-handedly obtained the airport for Yellowstone National Park, turning the first shovel. The Senator explained the long history of federally financed jet-size airport, which took some 12 years. By this time, the opening date was projected to be the spring of 1965. Terrell C. Drinkwater, president of Western Airlines believed that the re-establishment of commercial air service to Yellowstone National Park would give a tremendous boost to Montana’s multi-million dollar tourist business. Western Airlines planned daily service with

\textsuperscript{26} "$1,034,890 Federal Funds Allocated Montana Airports" 1 August 1962 \textit{The Independent Record}; $646,000 Granted for Airport at West Yellowstone" 1 August 1962 \textit{The Montana Standard}; "Over $1 Million Allotted for State Airports" 2 August 1962 \textit{The Montana Standard}.

\textsuperscript{27} "Examiners Open Bids on West Yellowstone Job" 15 April 1962 \textit{The Independent Record}.

\textsuperscript{28} "West Yellowstone Airport F.A.A.P Project No. 9-24-068-01: Runway, Taxiway, Terminal Apron, and Lighting Systems.” Blueprints from January 28, 1963 on file with Morrison-Maierle, Inc.

\textsuperscript{29} "West Yellowstone Airport Terminal and Maintenance Buildings F.A.A.P. Project No. 9-24-068-C301 Montana Aeronautics Commission Project No. 111-7-58” Blueprints from September 10, 1963 on file with Morrison-Maierle, Inc.

\textsuperscript{30} "West Yellowstone Airport Bids Cleared by Udall" 14 April 1963 \textit{The Independent Record}.

\textsuperscript{31} "Examiners Open Bids on West Yellowstone Job" 15 April 1962 \textit{The Independent Record}; Bid Study Planned: West Yellowstone Airport Contract is Delayed" 16 April 1963 \textit{The Independent Record} "Western Air Plans Jet Service to Yellowstone Park" 28 may 1963 \textit{The Independent Record}; "Mansfield to Speak: West Yellowstone Airport Groundbreaking Today" 2 June 1963 \textit{The Independent Record}.

\textsuperscript{32} "Cost 920,495; West Yellowstone Airport Contract is Awarded" 29 April 1963 \textit{The Independent Record}.
four-engine pressurized planes with both deluxe and air coach accommodations and since the field would be lighted for night operations, it could be used by large aircraft up to and including the jet-powered Electra IIs.33

Thereafter, the Montana State Board of Examiners set February 19, 1964 as the date to open bids for the Yellowstone Airport terminal building and maintenance buildings.34 The bids were studied and on March 2, 1964, the Board of Examiners awarded three contracts for construction of the airport terminal and maintenance buildings. The general contract for $158,768 went to Wallace Diteman, Inc. (Bozeman, Montana). The mechanical contract for just less than $19,000 went to Fullerton Plumbing & Heating (Hamilton, Montana). The electrical contract went to Bozeman Electric for just over $16,000. With other minor contracts, the total cost was just under $200,000.35 In September 1964, an additional $10,000 was approved to provide more tie-down areas for the new airport.36 The tie-down area for aircraft was 250 feet wide by 1,300 feet in length with room for forty aircraft on permanent tie-down on pavement. There was also a turfed area available for free aircraft parking off pavement.37 That fall the runways, taxiways, aprons, and lights were finished and by January of the next year, the terminal building was eighty percent complete. At this time, NPS requested and received $82,000 for smokejumpers facilities at the new airport, which was set to open in May 1965.38

On April 18, 1965, it was announced that Big Sky Aviation Corporation, a private flying service, would manage and operate the jet-capacity airport and Harold E. Wright would be the Yellowstone Airport manager. The terminal building was a modern structure of western and rustic motif of natural stone, glass, steel and wood. On the first level were a large lobby and waiting area, three rental car booths, and a curio shop. A restaurant and cocktail lounge were planned for the future. On the two mezzanine levels, there were special offices for all the tenants and concessionaires, which included the Yellowstone Park Company. It had an office in the administration building in order to serve the public with packaged tours through Yellowstone Park in conjunction with the airlines. Western Airlines continued to hold the franchise to serve Yellowstone Airport,39 but as the airport neared being finished, Frontier Airlines expressed interest in establishing a route to Yellowstone Airport and applied to the Civil Aeronautics Board for a new route. They proposed using the airport as an intermediate stop between Jackson, Wyoming and Billings, Montana as an extension of their summer season Denver-Jackson flight that used a 52-passenger Conair.40

Elaborate ceremonies were made for the opening day of the Yellowstone Airport. MAC, the sponsor, owner and operator of the airport (the largest recreational air carrier airport in the nation) arranged the ceremonies.41 It was projected that 2,000 people would attend, including thirty newsmen and a full slate of thirty dignitaries and
officials of local, state, and federal governments to witness the inaugural flight by Western Airlines Lockheed
Electra from Salt Lake City. Western, the only airline so far routed into the immediate Yellowstone National Park
area, proposed operating two flights daily to the airport beginning June 12 out of Los Angeles and Salt Lake City,
connecting with flights from all parts of the nation. These flights marked the return of commercial air service to
the nation's first and largest national park after a lapse of seventeen years. Eight Air Force F101 jet fighters and
eight Montana Air National Guard F89 jets from Great Falls, Montana were slated to fly over the ceremony.
Additionally, two hundred other aircraft were expected to fly in for the ceremony and displays as well.42

On June 12, 1965, the $1.3 million Yellowstone Airport was dedicated and Yellowstone National Park entered
the jet age. The program got underway at noon with the opening of public displays of the airport and terminal
building and showings of National Guard, Air Force, and USFS smokejumper aircraft. A crowd of more than
1,500 attended the dedication ceremonies, which were unfortunately shortened by rainsqualls. The scheduled fly-
over of Air Force jet fighters and Montana National Guard jet aircraft had to be cancelled due to the inclement
weather. Gordon Hickman, chairman of MAC, served as master of ceremonies at the dedication and opened his
remarks with an apology for the weather, which he joked came from outside of Montana. F.H. Christenson, who
had a government star route mail contract to serve Yellowstone after opening of the original airport in 1935, made
the opening speech. Federal government speakers included Deputy Secretary of the Interior John A. Carver, Jr.,
Colonel John Dregge, member of the Civil Aeronautics Board and Cole Morrow, director of airport services for
the FAA. Assistant Regional Forester E.R. Silva informed the crowd that in July, the Forest Service in conjunction
with the Bureau of Land Management (BLM), and NPS would be constructing a $200,000 forest fire control
center at the north end of the airport. Included would be a smokejumper dormitory, parachute loft, and dispatch
center.43

The new commercial air service to Yellowstone Park was a hit. By July 1965, Western Airlines had doubled its
traffic at Yellowstone, handling 4,339 passengers. In August, Western Airlines asked the Civil Aeronautics Board
(CAB) for a service charter to add Yellowstone Airport as a gateway from such cities as Denver, Colorado,
Casper, Wyoming, and Billings and Great Falls in Montana. Frontier Airlines also sought this route; however,
Western Airlines was awarded the one-stop service between Denver and Billings. At the CAB hearing, the growth
of winter sports was mentioned and the idea for winter service to the area was planted.44

In October 1965, the USFS issued a call for bids on the construction of an interagency fire control center at the
Yellowstone Airport.45 The project amounted to a miniature version of the regional fire control depot and smoke
jumper base at Missoula with a combination warehouse-office building, a 12-man dormitory, water and sewer
systems, access roads, parking areas, taxiway and apron, and tanks for fire retardant mixing. The bids were opened
on November 25, 1965 and Wallace Diteman, Inc. of Bozeman submitted the apparent low bid of $219,675 of
the nine bids submitted.46

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42 "2,000 Are Expected to Attend Dedication of $1.3 Million West Yellowstone Airport" 7 June 1965 The Montana Standard
[Butte, Montana]; "Festivities Loom for Opening of West Yellowstone Airport" 10 June 1965 The Post Register.
43 "WAL Inaugural Run: Rites Open New Airport for West Yellowstone" 13 June 1965 Salt Lake Tribune; "Squalls Hamper Port
Dedication" 15 June 1965 The Post Register.
45 "Center Bid Call Issued" 20 October 1965 The Daily Inter Lake; "Montana Events This Week Listed" 25 October 1965 The
Independent Record.
46 "Bids Opened on Smoke Jumper Base" 25 November 1965 The Daily Inter Lake.
Following the construction of the fire control depot at the north end of the airport, from time to time other projects were proposed to expand the Yellowstone Airport. For instance, in 1970, an effort was made to expand the runway to 11,900 feet, long enough to handle fully loaded Boeing 737 and 727 planes and to install an instrument landing system. The plan was to use NPS funds to match FAA funds allotted under a Federal Airport Master Plan. However, federal funding was lacking to finance the $1.4 million project. There was even talk of building an airport within the boundaries of Yellowstone Park, but that idea was quickly dashed with cold water for reasons of safety and the desire to retain the park as much as possible in a natural state and to prevent noise pollution within wilderness areas. The safety issue was based on the habit of some commercial flights to circle Old Faithful before landing at the Yellowstone Airport. In the summer of 1969, there were three near misses from mid-air collisions—one involving a commercial airline. NPS Park Superintendent Jack K. Andersen also said he could not justify the runway extension because of the impact of visitors at the west entrance was "almost beyond car capability." 47

In 1970, the issue of the size of the Yellowstone Airport terminal was brought up as well. At the time of construction, people needled MAC officials about the small size of the building, asking if they "planned on storing hay in it." Montana operated the airport because of a twenty-year contract signed in 1965, when the federal government built the airport. But with limited state funds to improve the only airport that MAC had ever built and operated, modernization of the airport was limited to matching federal funds to light the Yellowstone Airport. 48 In June 1972, Wenzel and Company of Great Falls was selected for the construction and upgrading of lighting at the Yellowstone Airport. The work was estimated to cost $100,000. 49

A lack of funding for the Yellowstone Airport continued to hamper improvements there. In 1973, there was reluctance on the part of Montana’s legislature to appropriate $65,000 of state funds for the Yellowstone Airport from the state aeronautics division to match federal funds to be used mainly for meeting federal anti-hijacking safeguards. If the improvements were not made, the airport was in danger of losing "its certification as a commercial airfield and Western and Frontier Airlines probably would stop serving the Yellowstone National Park gateway." As one paper put it, "if West Yellowstone residents want continued air service, they may have to cough up funds to improve their airport or put wings on their snowmobiles." 50 Eventually, the state appropriated $40,000 to construct a crash fire building. 51

Money troubles continued in 1974 and for years thereafter. In 1974, the only state-owned air carrier port in Montana was open five months and had six commercial flights each day. Nonetheless, it financial reports indicated that it barely broke even that season. Additionally, the Yellowstone Airport manager warned that the airport might have to close during the 1975 season unless it received $195,000 to seal-coat the runway. 52

Many thought the airport should be opened on a year-round basis, even though Western and Frontier Airlines seemed uninterested in year-round scheduled flights. They included Ski Yellowstone, a proposed recreational complex, Yellowstone Park Company, and many residents and community businessmen. To do so, the major

49 "Contracts for $850,000 Let" 19 June 1972 The Independent Record.
51 "Capitol, UM Projects Take Bulk of $4.3 Million in Building Funds" 22 May 1973 Great Falls Tribune [Great Falls, Montana].
52 "West Yellowstone" 24 December 1974 Great Falls Tribune.
In 1978, state and federal funding for $690,000 was approved for improvements to the Yellowstone Airport with over eighty-three percent coming from the federal government. The monies were used in 1980 to repair the airport’s main runway in July and August that year. Western Airline cancelled its flights while the runway was closed but Frontier Airlines agreed to land on the airport’s taxiway during this period. The next year, an additional $161,036 was expended for runway and taxiway lighting repairs because gophers had eaten away insulation on underground wiring for the lighting system. Also in 1980 a generator building and 500 gallon diesel fuel tank were installed on the airport grounds to keep the runway and taxiway lights running in the event of a power outage.

The year 1979 was the busiest year ever at the Yellowstone Airport. That year, 23,563 scheduled passengers were boarded and there were four daily round trips, two each to Salt Lake City and Denver. However, starting in 1983, business declined to just 15,000 passengers and there were only two daily round-trip flights to Yellowstone. Three reasons appeared to account for the decline: a decline in foreign visitors caused by the devaluation of foreign currency against the strength of the U.S. dollar, lack of consistent airline service to Yellowstone, and the lack of a solid marketing plan for the Yellowstone Airport area. This meant reduced income for car rental businesses, private aviation service, the gift shop, and the entire community. Airport ownership came into question when MAC's contract was set to expire. In 1987, an amendment was attached to the main House appropriations bill, directing the Commerce Department to transfer ownership of the 25-year old airport to the Town of West Yellowstone or another local public authority willing to operate the airport. If no public entity was willing to take over, the legislature proposed closing the airport.

The airport did not close and MAC continued to own and operate the Yellowstone Airport after 1987. In the spring of that year, Western Airlines merged with Delta Airlines and became known as Delta. Thereafter, Skywest Airlines, operating as Delta Connection, with Embraer EMB-120 Brasilia turboprops, served the airport on a seasonal basis. In June 2015, Skywest upgraded its seasonal Delta Connection service to Yellowstone Airport with Canadair CRJ-200 regional jet service, thus marking the first time the airport has had jet service in nearly thirty years.

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54 "Budget Proposal Includes $29.8 Million for Buildings" 27 December 1978 Great Falls Tribune.
55 "Big Sky Plans to Cut Service" 15 May 1980 Great Falls Tribune.
56 "Prison Guard TowerBid Goes to Sletten" 27 September 1981 Great Falls Tribune.
57 "Air Traffic to West Yellowstone Falls" 4 August 1984 Great Falls Tribune.
58 "Airport Ownership Plan Criticized" 27 July 1988 Great Falls Tribune.
59 "Western Closes Half Century in Montana" 29 March 1987 Great Falls Tribune.
INFORMATION SOURCES/BIBLIOGRAPHY

See footnotes in the “History of Property” section above for specifics; however the sources include the following:

Montana and the Sky
West Yellowstone Historic Center
The Salt Lake Tribune
The Ogden Standard-Examiner
The Daily Inter Lake
Montana Butte Standard
The Independent Record
The Yellowstone Story: A History of Our First National Park
The Post Register
The Billings Gazette
The Montana Standard
The Butte Daily Post
Great Falls Tribune
Statement of Significance

Property Name: Yellowstone Airport

NATIONAL REGISTER OF HISTORIC PLACES

NRHP Listing Date:
NRHP Eligibility: ☒ Yes ☐ No ☒ Individually ☐ Contributing to Historic District ☐ Noncontributing to Historic District
NRHP Criteria: ☒ A ☐ B ☒ C ☐ D
Area of Significance: Commercial and Transportation/Architecture  Period of Significance: 1964 - present

STATEMENT OF SIGNIFICANCE

Criteria A
After World War II the growth of the American middle class, the prevalence of the consumer economy, the technological advances in aviation, and the rekindled interest in nature lead to a boom in visitation to western parks, and none so more than Yellowstone Park. Located at the western entrance to the National Park, the Yellowstone Airport became a significant economic addition for the National Park Service, Gallatin County, and the Town of West Yellowstone.

Groundbreaking took place on June 2, 1963 with Senator Mike Mansfield in attendance along with officials and speakers from the FAA, NPS, Gallatin National Forest, and MAC. More than 200 witnesses attended with Senator Mansfield, who almost single-handedly obtained the airport for Yellowstone National Park, turning the first shovel. The Senator explained the long history of the federally financed jet-size airport, which took some 12 years. By this time, the opening date was projected to be the spring of 1965. Terrell C. Drinkwater, president of Western Airlines believed that the re-establishment of commercial air service to Yellowstone National Park would "give a tremendous boost to Montana's multi-million-dollar tourist business." Western Airlines planned daily service with four-engine pressurized planes with both deluxe and air coach accommodations and since the field would be lighted for night operations, it could be used by large aircraft up to and including the jet-powered Electra IIs. The new commercial air service to Yellowstone Park was a hit. By July 1965, Western Airlines had doubled its traffic at West Yellowstone, handling 4,339 passengers and in August of that year, Western Airlines asked the Civil Aeronautics Board (CAB) for a service charter to add Yellowstone Airport as a gateway from such cities as Denver, Colorado, Casper, Wyoming, and Billings and Great Falls in Montana. While the ridership numbers of those coming through the Yellowstone Airport Terminal has ebbed and flowed over its history, the airport’s economic significance and its association with Yellowstone National Park tourism in the 1960’s is substantial.

Criteria C
The Yellowstone Airport 1965 terminal illustrates the distinctive characteristics of the Mission 66 architectural style. The Yellowstone Airport terminal building is a simple vernacular architectural expression of western “modernism” with prevalent use of un-coursed ashlar natural stone fabric, large numbers of tall-banded vertical windows and brown stained rustic board and batten wood siding with functional interior space and conventional airport seating. The airport’s branding focused on the airport’s high elevation and significance as Yellowstone National Park’s west entrance. With significant National Park Service funding through the Department of Interior, and given its date of construction, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy. The terminal is unique in its function among Mission 66 buildings as an airport and it one of, if not the only, example that has not been significantly altered since its construction. While the interior has undergone significant remodeling at different times, most notably in response to the post 9-11 Traffic Security Administration (TSA) requirements, as well as to accommodate rental cars, helicopter tours, and Life Flight business within the building, and also in the upstairs offices, the café, and the addition of new bathroom facilities,
much of the feel of the original Mission 66 style is evident in the lobby of the terminal. Outside of resurfacing the top of the roof, the exterior has undergone minimal alteration.
INTEGRITY (location, design, setting, materials, workmanship, feeling, association)
The Yellowstone Airport Terminal site retains all seven aspects of integrity. The property has not been moved from its original location, the exterior design of the building has not been altered, the secluded high mountain setting has not been altered, the physical materials are mostly intact, and the particular Mission 66 program workmanship and association is evident.

Features 1 contributes to the site’s eligibility as an original and largely unmodified structure. Features 2, 3, and 4 do not contribute as they were added and then altered after 1980 and therefore do not contribute to the site’s NRHO eligibility.
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1
Facing: North
Description: Yellowstone Airport Terminal
Property Name: Yellowstone Airport

Site Map

Feature #1
Facing: East
Description: Yellowstone Airport Terminal
Property Name: Yellowstone Airport

Feature # 1
Facing: South
Description: Yellowstone Airport Terminal
Property Name: **Yellowstone Airport**

Site Number: **24GA1958**

Feature #1

Description: Yellowstone Airport Terminal

Facing: West
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1
Facing: SW

Description: Yellowstone Airport Terminal, passenger entrance and parking area
<table>
<thead>
<tr>
<th>Feature #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>SE corner of the terminal where elevations connect with shed roof. Note the un-coursed ashlar nature stone fabric and rustic board and batten siding</td>
</tr>
</tbody>
</table>
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1
Facing: East

Description: Northern portion of the terminal. Note the high banded vertical windows.
Property Name: Yellowstone Airport

Feature # 1
Description: Terminal Lobby Interior.
Facing: NE

Site Map
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1  Description: Terminal Lobby Interior.
Facing: SW
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1
Facing: West

Description: Façade between Level 1 and 2
Property Name: Yellowstone Airport

Feature # 1
Facing: SW

Description: Remodeled café area.
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1 Description: Remodeled café area.
Facing: NE
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1

Description: Updated security gate and luggage screening area.

Facing: West
Property Name: Yellowstone Airport

Feature # 1
Description: Rental Desk
Facing: South
Property Name: Yellowstone Airport

Feature # 1
Description: Delta Ticketing and Check-in.
Facing: North
Feature # 1  Description: Commemorative Plaque
Facing: NE
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 1  Description: Commemorative Plaque
Facing: NE
Property Name: Yellowstone Airport

Feature # 2
Facing: North

Description: Generator Shed
Property Name: **Yellowstone Airport**

Feature # 2
Facing: South

Description: Generator Shed
Property Name: Yellowstone Airport

Feature # 2, 3, and 4
Facing: SW

Description: Generator shed, fuel tank, and filled in pit.
<table>
<thead>
<tr>
<th>Feature #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Fuel Tank</td>
</tr>
</tbody>
</table>

- **Facing:** NW
Property Name: Yellowstone Airport

Site Number: 24GA1958

Feature # 4
Facing: SE

Description: Filled in pit.
| Property Address: | 721 Airport Road  
| Historic Address (if applicable): | West Yellowstone, MT  
| Site Number: | 24GA1981  
| (An historic district number may also apply.) |  
| City/Town: | West Yellowstone  
| County: | Gallatin  
| Historic Name: | Yellowstone Airway Beacon  
| Original Owner(s): | State of Montana  
| Current Ownership: | Private  
| Current Property Name: | Yellowstone Airway Beacon  
| Owner(s): | State of Montana  
| Owner Address: | PO Box 200507  
| | Helena, MT 59620  
| Phone: | 406-444-9566  
| Historic Use: | Airway Beacon  
| Current Use: | Airway Beacon  
| Construction Date: | 1964/1965  
| | Estimated  
| | Actual  
| UTM Reference: | www.nris.mt.gov/topofinder2  
| PM: | Montana  
| Township: | 13S  
| Range: | 5E  
| NE ¼ NE ¼ SE ¼ of Section: | 21  
| Addition: | Year of Addition:  
| USGS Quad Name: | West Yellowstone  
| Year: | 2000  
| Date of this document: | 4/15/2019  
| Form Prepared by: | Shane Hope and Anthony Godfrey  
| Address: | PO Box 11907, Bozeman, MT 59719  
| Daytime Phone: | 406-284-2223  
| MT SHPO USE ONLY | Eligible for NRHP:  
| | □ yes  
| | □ no  
| Criteria: | □ A  
| | □ B  
| | □ C  
| | □ D  
| Date: |  
| Evaluator: |  
| Comments: |  

ARCHITECTURAL DESCRIPTION

Architectural Style: NA If Other, specify: 
Property Type: Miscellaneous Specific Property Type: Nighttime Airway Beacon

Architect: Likely the US Department of Commerce, Bureau of Air Commerce Architectural Firm/City/State: Washington DC
Builder/Contractor: Likely the Bureau of Air Commerce originally/ Bozeman Electric once relocated Company/City/State: Bureau of Air Commerce, Washington DC/ Bozeman Electric, Bozeman, MT

The site is the Yellowstone Airway beacon tower. The tower is comprised from 3” pieces of angle steel bolted together at each connection point. The base of the tower measure 12’ square and is orientated NE to SW. The tower is 51 feet tall and has a small platform at the top measuring approximately 4 feet square, which houses the beacon apparatus. A steel ladder without a safety cage is attached to the SE elevation and gives access from the ground to the platform. This beacon tower relocated the airport grounds at the same time as 24GA1958 (the Yellowstone Airport), circa late 1964 or early 1965, though it is not clear where the tower originated. Jon Axline, historian for the Montana Department of Transportation, suggests that the tower may have been relocated from the old West Yellowstone Airport, which would make logistical and monetary sense given the relative proximity of the two airport sites. In addition, Mr. Axline believes the tower appears to be of the same construction style as those constructed in the 1930s¹. While the beacon tower is likely of the original construction style as it was pre-relocation, the rotating and lighted beacon equipment has gone through numerous changes as electrical equipment has expended its useful life. While records of the electrical modifications are not available, airport staff noted that modifications have been made as recently as, approximately, 2009².

¹ Personal communication with Jon Axline, historian for the Montana Department of Transportation on April 16, 2019.
² Personal communication with Travis Eickman, Senior Airport Engineer with Morrison-Maierle on April 10, 2019.
HISTORY OF PROPERTY

By the end of World War I, aircraft design and engine development had progressed to a remarkable degree of efficiency with pilots no longer flying on a "wing and a prayer" and in the mid-to-late 1920s, the commercial air business began to bloom in Montana. By 1927, National Parks Scenic Airways, located in Billings, Montana, began flying passengers to numerous Montana destinations, such as Helena, Great Falls, Bozeman, and as far as Cody, Wyoming and Lewiston, Idaho. Soon thereafter, National Parks Airways acquired an airmail contract with the U.S. Post Office, becoming Montana's first scheduled airline to receive such a contract. On August 1, 1928, National Parks Airways inaugurated airline service between Salt Lake City, Utah and Great Falls, Montana under this contract.³

In 1932, West Yellowstone residents founded the West Yellowstone Commercial Club to start securing funds for the construction of local airport and to file successfully for a special use application with the U.S. Forest Service (USFS). The permit expired; however, in 1934 it was reissued to Gallatin County. In autumn of 1933, the USFS, specifically the Targhee National Forest, contributed a 130-acre tract of land directly west of the city limits bounded by Iris Street for the airport. Local labor and private capital was initially used to clear the standing timber, amounting to over half million trees. However, due to mounting costs, the work was stopped until the Civil Works Administration (CWA) and airport division of the Federal Emergency Relief Administration (FERA) contributed roughly $147,000 to finish preparing the land. The runway was leveled using gravel removed from a large pit between the two runways.⁴ The entire project required a year and half to construct the runway and the modern new air terminal in its primitive surrounding of tall pines.⁵ Meanwhile, in August 1933, Scenic Airways secured a contract to deliver winter mail to the Town of West Yellowstone three times a week.⁶

The Yellowstone Airport was dedicated on June 22, 1935 and attended by thousands from major cities in the Rocky Mountain area to witness the advent of transport and airmail service to a national park. The celebration featured maneuvers of a fleet of army planes from the army and naval base at Seattle, Washington and airplane trips over Yellowstone and Grand Teton National Parks.⁷ At the close of the ceremony, a National Parks Airway plane flew out of the airport with 12,000 special first day letters. Copper souvenirs were attached to all letters contained in the initial airmail consignment out of the Yellowstone Airport.⁸

By June 1935, National Parks Airways provided Utah cities with early morning and afternoon flights to the famous western gateway of Yellowstone Park. The new service, the first operation of any scheduled airline to a national park gateway, also provided one daily flight to West Yellowstone from Butte, Montana, except Saturdays and Sundays, and two return flights. The airline had installed radio equipment in its hangar to accommodate the airline's operations. Additionally, the U.S. Post Office authorized regularly scheduled daily flights to the newly constructed Yellowstone Airport by National Parks Airways, making it the highest elevation airport located in the United States to be serviced by mail and transport airplanes.⁹

⁴ "Building an Airport in West Yellowstone" West Yellowstone Historic Center, www.yellowstonehistoriccenter.org/.
⁵ "West Yellowstone Airport Dedicated as Leaders Meet" 23 June 1935 The Salt Lake Tribune [Salt Lake City, Utah].
⁶ "Building an Airport in West Yellowstone" West Yellowstone Historic Center, www.yellowstonehistoriccenter.org/.
⁷ "Airport Opening at Yellowstone to Draw Crowd" 22 June 1935 The Salt Lake Tribune.
⁸ "West Yellowstone Airport Dedicated as Leaders Meet" 23 June 1935 The Salt Lake Tribune; "West Yellowstone" 3 August 1935 The Daily Inter Lake [Kalispell, Montana].
⁹ "West Yellowstone to Be on Air Line" 11 June 1935 The Ogden Standard-Examiner [Ogden, Utah]; "Airport Opening at Yellowstone to Draw Crowd" 22 June 1935 The Salt Lake Tribune; "National Parks Ships Will Land Near Park" 20 July 1935 Montana Butte Standard [Butte, Montana].
A year later, a celebration at the Yellowstone Airport marked and commemorated the establishment of the airport, which had been grubbed from solid timber to provide an excellent landing field. Governors from Montana, Idaho, Wyoming and Utah attended and spoke during the morning's program and celebrated recognition of the port as a regular stop on an air route and the start of the first direct air service to a national park. The Yellowstone Airport cost approximately $2,000 and was only about eighty percent complete.\(^{10}\) Additionally that season, the National Parks Airways began to operate a scenic air tour of Yellowstone and Grand Teton National Parks as an "outstanding feature of its vacation service." The tours originated and terminated at the Yellowstone Airport and started on June 10, 1937.\(^{11}\)

However, on August 1, 1937, Western Air Express acquired and took over the operations of National Parks Airways. This merger increased service to Las Vegas and the west coast airports like Los Angeles and San Diego.\(^{12}\) A year later, Western Air showed a marked increase in passenger service, which officials attributed to daily air service to Glacier and Yellowstone National Parks. They even promoted and provided a one-day fishing tour to Yellowstone Park. A sportsman could now fly from Los Angeles to the Yellowstone Airport from where the fly-fisherman could be fully equipped with tackle, bait, motor boat and guide, and driven to the famous trout fishing waters of Hebgen Lake and the Madison River.\(^{13}\) By 1940, Yellowstone Park air traffic was at an all-time high and as a result, Western Air Express furthered a new scenic excursion. The airline inaugurated a route that took the passenger from Salt Lake City to the Yellowstone Airport following the Snake River, crossing the edge of Jackson Lake and the Tetons and passing over Old Faithful geyser.\(^{14}\) However, with the bombing of Pearl Harbor on December 7, 1941 and the coming of World War II, service to the Yellowstone Airport was deemed "non-essential" due to the war effort.\(^{15}\)

Following World War II, Yellowstone Park tried to return to normalcy but had difficulties during the postwar period. While visitation was up because the American public wanted a change of scenery and national parks were among the places they traveled to looking for it, the Northern Railroad found Yellowstone Park tourism less profitable than it had been in earlier times and decided to give up re-establishing the former pattern of passenger traffic to the park. Air service was thereafter seen as a substitute for rail service as a prime carrier for continuing tourist traffic into the park.\(^{16}\)

In June 1946, Yellowstone National Park was linked once more to the nation's airline network, when Western Air Lines began landing two flights daily at the Yellowstone Airport. One flight was from Los Angeles to Great Falls with a stop at West Yellowstone and the other was a one and three-fourths hour direct flight from Salt Lake City to the airport.\(^{17}\) However, in March 1948, changes in civil air regulations prohibited Western Air Lines from continuing commercial summer service between 10 a.m. and 4 p.m. because of "local wind and runway conditions." Apparently, the trees at the end of the runway had grown to be dangerously tall. The


\(^{11}\) "Air Service to Park Will Start June 10" 31 May 1937 The Independent Record [Helena, Montana].

\(^{12}\) "Western Air Express Takes Over National Parks Today: Will enlarge Plane Service" 1 August 1937 The Independent Record.

\(^{13}\) "Western Air Shows Marked Increase in Passenger Business" 12 July 1938 The Independent Record.

\(^{14}\) "Blood is Guest on First Flight" 18 June 1940 The Ogden Standard-Examiner; "Yellowstone Air Traffic Up" 16 August 1940 The Post-Register [Idaho Falls, Idaho].

\(^{15}\) "Building an Airport in West Yellowstone" West Yellowstone Historic Center, www.yellowstonehistoriccenter.org/.


\(^{17}\) "WAL Links S.L., Yellowstone Park" 17 June 1946 The Salt Lake Tribune.
closest airport that could bring commercial passengers to Yellowstone National Park was at Bozeman, Montana. The commercial service suspension came at a time when visitation to Yellowstone National Park had reached over 1 million for the first time with the west entrance being the most popular gateway. Because of the suspended service, only twenty-two visitors arrived by plane that year.  

Although commercial service was suspended at the Yellowstone Airport, private planes continued to use the airport even after 1948. Meanwhile, in 1951, NPS and the Civil Aeronautics Administration and Western Airlines officials met to consider re-establishment of commercial service to serve the park. Transformation of that idea came in September 1958 when Senator Mike Mansfield (D-Montana) and several Interior Department agencies began to lobby for new airport at West Yellowstone to serve Yellowstone Park and adjoining areas in Montana, Idaho, and Wyoming. The problem was appropriating the money and dividing responsibilities between the federal agencies and the Montana Aeronautics Commission (MAC). At that point, it was decided that the USFS would act as the contracting agency and joint sponsor for construction of the new airport on land it administers, the Civil Aeronautics Administration (CAA) and the National Park Service (NPS) would share the construction costs and MAC would maintain and operate the airport.

By 1961, however, plans changed. At that time, MAC has instead accepted sponsorship of the construction and operation of the new Yellowstone Airport and requested federal funding for the project. Construction planning was put in charge of the Federal Aviation Agency (FAA), NPS, and the USFS. Funding came in September when a Senate Committee approved $735,000 for construction of the new airport with a 7,000-foot runway, long enough to handle commercial flights. State funds would be used to administer the construction and operation of the airport. Nonetheless, the House of Representatives rejected the appropriation. It was hoped that the project would be included in the regular 1963 fiscal year budget. President John F. Kennedy did include funding in his budget that year: $165,000 for a new terminal building, utilities, landscaping, etc. and $570,000 for construction of the runway, including the runways, taxi strips, aprons, and service roads. By February 1962, the Montana State Board of Examiners authorized MAC to hire an engineering firm for the all-federal Yellowstone Airport project. In June that year, the Senate once again passed an appropriation of $735,000 for the project to serve Yellowstone National Park. This time, both houses of Congress approved the $735,000 as a NPS contribution toward the Yellowstone Airport. The USFS agreed to make available any necessary lands. At the same time, the FAA granted MAC $646,332 for construction work of a 9,000-foot

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18 "WAL Arranges for Flights into Jackson" 28 March 1948 The Salt Lake Tribune; "Building an Airport in West Yellowstone" West Yellow Historic Center, www.yellowstonehistoriccenter.org; "Park Travel Hits Million" 11 October 1948 The Post-Register [Idaho Falls, Idaho]; "Travel Mark Set at Park: Improved Facilities Set at Yellowstone, Survey Report Shows" 13 October 1949 The Post-Register.
20 "Federal Agencies Agree Airport Needed for Yellowstone, Question Now is Money" 11 September 1958 The Independent Record.
22 "New West Yellowstone Airport Funds Favorled" 23 September 1961 The Billings Gazette.
25 "2 Airports to Be Engineered" 20 February 1962 The Daily Inter Lake.
26 "Bill Includes Funds for Parks" 13 June 1962 The Daily Inter Lake; "More Than $13 Million Has Been Appropriated for Interior Projects in State" 13 June 1962 The Independent Record.
runway, taxiways, aprons, fencing, field lights, and other airport equipment. Construction was planned to begin in May 1962 and to be completed in the fall of 1963. The terminal would be constructed soon thereafter and scheduled to be in operation in the summer of 1964.

Wenzel and Company, a consultant engineering company from Great Falls, Montana, drew up preliminary plans for the runway, taxiway, terminal apron, and lighting systems in early 1963. By September of that year, the plans for the terminal and maintenance buildings were completed by a team of Wenzel and Company, along with Knight and Van Teylingen, an architecture and engineering firm from Great Falls. With National Park Service funding, and given its date of construction, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy.

By the spring of 1963, an inter-agency financial agreement with the FAA was signed, allowing the bidding process for construction to begin. Specifications called for the construction of a paved runway 8,400 feet long and 150 feet wide that could accommodate the propjet planes used by most major airlines. Because of the altitude of 6,636 feet, the runway had to be forty-two percent longer than strips at lower levels. The site of the new airport was to be 1½ mile north of West Yellowstone and a half-mile west of Highway 191 and built on 735 acres of the Gallatin National Forest. On April 15, 1962, seven construction bids were opened. They were from S. Birch & Sons Construction Company (Great Falls, Montana), Robert V. Burggraf Company (Idaho Falls, Idaho), Peter Kiewit Sons Company (Billings, Montana), Komatz Construction Company (St. Peters, Minnesota), McLaughlin Inc. (Great Falls), S.S. Mullen Company (Seattle, Washington) and Zook Brothers Construction (Great Falls). However, because of the complexity of the bids, the low bidder was not named immediately.

On April 29, 1963, Robert V. Burggraf Company of Idaho Falls, Idaho was announced as the lowest acceptable bid of $920,495. The Interior Department provided forty-seven percent of the funding and the remainder came from the FAA. Completion was required by October 1, 1964.

Groundbreaking took place on June 2, 1963 with Senator Mike Mansfield in attendance along with officials and speakers from the FAA, NPS, Gallatin National Forest, and MAC. More than 200 witnesses attended with Senator Mansfield, who almost single-handedly obtained the airport for Yellowstone National Park, turning the first shovel. The Senator explained the long history of federally financed jet-size airport, which took some 12 years. By this time, the opening date was projected to be the spring of 1965. Terrell C. Drinkwater, president of Western Airlines believed that the re-establishment of commercial air service to Yellowstone National Park
Property Name: Yellowstone Airport Beacon

History of Property

Western Airlines planned daily service with four-engine pressurized planes with both deluxe and air coach accommodations and since the field would be lighted for night operations, it could be used by large aircraft up to and including the jet-powered Electra IIs.34

Thereafter, the Montana State Board of Examiners set February 19, 1964 as the date to open bids for the Yellowstone Airport terminal building and maintenance buildings.35 The bids were studied and on March 2, 1964, the Board of Examiners awarded three contracts for construction of the airport terminal and maintenance buildings. The general contract for $158,768 went to Wallace Diteman, Inc. (Bozeman, Montana). The mechanical contract for just less than $19,000 went to Fullerton Plumbing & Heating (Hamilton, Montana). The electrical contract went to Bozeman Electric for just over $16,000, which presumably included the airway beacon tower. With other minor contracts, the total cost was just under $200,000.36 In September 1964, an additional $10,000 was approved to provide more tie-down areas for the new airport.37 The tie-down area for aircraft was 250 feet wide by 1,300 feet in length with room for forty aircraft on permanent tie-down on pavement. There was also a turfed area available for free aircraft parking off pavement.38 That fall the runways, taxiways, aprons, and lights were finished and by January of the next year, the terminal building was eighty percent complete. At this time, NPS requested and received $82,000 for smokejumpers facilities at the new airport, which was set to open in May 1965.39

On April 18, 1965, it was announced that Big Sky Aviation Corporation, a private flying service, would manage and operate the jet-capacity airport and Harold E. Wright would be the Yellowstone Airport manager. The terminal building was a modern structure of western and rustic motif of natural stone, glass, steel and wood. On the first level were a large lobby and waiting area, three rental car booths, and a curio shop. A restaurant and cocktail lounge were planned for the future. On the two mezzanine levels, there were special offices for all the tenants and concessionaires, which included the Yellowstone Park Company. It had an office in the administration building in order to serve the public with packaged tours through Yellowstone Park in conjunction with the airlines. Western Airlines continued to hold the franchise to serve Yellowstone Airport,40 but as the airport neared being finished, Frontier Airlines expressed interest in establishing a route to Yellowstone Airport and applied to the Civil Aeronautics Board for a new route. They proposed using the airport as an intermediate stop between Jackson, Wyoming and Billings, Montana as an extension of their summer season Denver-Jackson flight that used a 52-passenger Conair.41

36 "West Yellowstone Airport Contractors Let" 2 March 1964 The Independent Record; "Let Contracts for State Construction" 4 March 1964 The Daily Inter Lake.
37 "West Yellowstone Airport Contracts Let" 2 March 1965 The Independent Record; "Order Plans Drawn for Second Phase of Capitol Remodeling" 23 September 1964 The Daily Inter Lake.
38 "Park Port Plans Unfold" 18 April 1965 The Post Register.
39 "West Yellowstone Airport Set to Open in May" 21 January 1965 The Independent Record; "Park Service Asks Money for Montana" 25 January 1965 The Independent Record.
40 "Park Port Plans Unfold" 18 April 1965 The Post Register; "Dignitaries Due at Port Opening" 8 June 1965 The Post Register.
41 "Frontier Airlines Wants Route to West Yellowstone" 23 March 1965 The Independent Record; "Flights to Park Are Asked" 24 March 1965 The Billings Gazette; "Festivities Loom for Opening of West Yellowstone Airport" 10 June 1965 The Post Register.
Elaborate ceremonies were made for the opening day of the Yellowstone Airport. MAC, the sponsor, owner and operator of the airport (the largest recreational air carrier airport in the nation) arranged the ceremonies. It was projected that 2,000 people would attend, including thirty newsmen and a full slate of thirty dignitaries and officials of local, state, and federal governments to witness the inaugural flight by Western Airlines Lockheed Electra from Salt Lake City. Western, the only airline so far routed into the immediate Yellowstone National Park area, proposed operating two flights daily to the airport beginning June 12 out of Los Angeles and Salt Lake City, connecting with flights from all parts of the nation. These flights marked the return of commercial air service to the nation’s first and largest national park after a lapse of seventeen years. Eight Air Force F101 jet fighters and eight Montana Air National Guard F89 jets from Great Falls, Montana were slated to fly over the ceremony. Additionally, two hundred other aircraft were expected to fly in for the ceremony and displays as well.

On June 12, 1965, the $1.3 million Yellowstone Airport was dedicated and Yellowstone National Park entered the jet age. The program got underway at noon with the opening of public displays of the airport and terminal building and showings of National Guard, Air Force, and USFS smokejumper aircraft. A crowd of more than 1,500 attended the dedication ceremonies, which were unfortunately shortened by rainsqualls. The scheduled fly-over of Air Force jet fighters and Montana National Guard jet aircraft had to be cancelled due to the inclement weather. Gordon Hickman, chairman of MAC, served as master of ceremonies at the dedication and opened his remarks with an apology for the weather, which he joked came from outside of Montana. F.H. Christenson, who had a government star route mail contract to serve Yellowstone after opening of the original airport in 1935, made the opening speech. Federal government speakers included Deputy Secretary of the Interior John A. Carver, Jr., Colonel John Dregge, member of the Civil Aeronautics Board and Cole Morrow, director of airport services for the FAA. Assistant Regional Forester E.R. Silva informed the crowd that in July, the Forest Service in conjunction with the Bureau of Land Management (BLM), and NPS would be constructing a $200,000 forest fire control center at the north end of the airport. Included would be a smokejumper dormitory, parachute loft, and dispatch center.

The new commercial air service to Yellowstone Park was a hit. By July 1965, Western Airlines had doubled its traffic at Yellowstone, handling 4,339 passengers. In August, Western Airlines asked the Civil Aeronautics Board (CAB) for a service charter to add Yellowstone Airport as a gateway from such cities as Denver, Colorado, Casper, Wyoming, and Billings and Great Falls in Montana. Frontier Airlines also sought this route; however, Western Airlines was awarded the one-stop service between Denver and Billings. At the CAB hearing, the growth of winter sports was mentioned and the idea for winter service to the area was planted.

In October 1965, the USFS issued a call for bids on the construction of an interagency fire control center at the Yellowstone Airport. The project amounted to a miniature version of the regional fire control depot and smoke jumper base at Missoula with a combination warehouse-office building, a 12-man dormitory, water and sewer systems, access roads, parking areas, taxiway and apron, and tanks for fire retardant mixing. The bids

42 "Dignitaries Due at Port Opening" 8 June 1965 The Post Register.
43 "2,000 Are Expected to Attend Dedication of $1.3 Million West Yellowstone Airport" 7 June 1965 The Montana Standard [Butte, Montana]; "Festivities Loom for Opening of West Yellowstone Airport" 10 June 1965 The Post Register.
44 "WAL Inaugural Run: Rites Open New Airport for West Yellowstone" 13 June 1965 Salt Lake Tribune; "Squalls Hamper Port Dedication" 15 June 1965 The Post Register.
46 "Center Bid Call Issued" 20 October 1965 The Daily Inter Lake; "Montana Events This Week Listed" 25 October 1965 The Independent Record.
were opened on November 25, 1965 and Wallace Diteman, Inc. of Bozeman submitted the apparent low bid of $219,675 of the nine bids submitted.\footnote{47 \"Bids Opened on Smoke Jumper Base\" 25 November 1965 \textit{The Daily Inter Lake}.}

Following the construction of the fire control depot at the north end of the airport, from time to time other projects were proposed to expand the Yellowstone Airport. For instance, in 1970, an effort was made to expand the runway to 11,900 feet, long enough to handle fully loaded Boeing 737 and 727 planes and to install an instrument landing system. The plan was to use NPS funds to match FAA funds allotted under a Federal Airport Master Plan. However, federal funding was lacking to finance the $1.4 million project. There was even talk of building an airport within the boundaries of Yellowstone Park, but that idea was quickly dashed with cold water for reasons of safety and the desire to retain the park as much as possible in a natural state and to prevent noise pollution within wilderness areas. The safety issue was based on the habit of some commercial flights to circle Old Faithful before landing at the Yellowstone Airport. In the summer of 1969, there were three near misses from mid-air collisions—one involving a commercial airline. NPS Park Superintendent Jack K. Andersen also said he could not justify the runway extension because of the impact of visitors at the west entrance was "almost beyond car capability."\footnote{48 \"Parks Airport Plans Shelved until 1972\" 11 February 1970 \textit{The Daily Inter Lake}; \"Parks Turn Down Airport Bid\" 11 February 1970 \textit{The Independent Record}; \"Yellowstone Skies Already Too Crowded\" 11 February 1970 \textit{The Montana Standard}.}

In 1970, the issue of the size of the Yellowstone Airport terminal was brought up as well. At the time of construction, people needed MAC officials about the small size of the building, asking if they "planned on storing hay in it." Montana operated the airport because of a twenty-year contract signed in 1965, when the federal government built the airport. But with limited state funds to improve the only airport that MAC had ever built and operated, modernization of the airport was limited to matching federal funds to light the Yellowstone Airport.\footnote{49 \"The Word for Aviation is Growth\" 1 March 1970 \textit{The Independent Record}; \"Construction\" 10 April 1971 \textit{The Montana Standard}.} In June 1972, Wenzel and Company of Great Falls was selected for the construction and upgrading of lighting at the Yellowstone Airport. The work was estimated to cost $100,000.\footnote{50 \"Contracts for $850,000 Let\" 19 June 1972 \textit{The Independent Record}.}

A lack of funding for the Yellowstone Airport continued to hamper improvements there. In 1973, there was reluctance on the part of Montana's legislature to appropriate $65,000 of state funds for the Yellowstone Airport from the state aeronautics division to match federal funds to be used mainly for meeting federal anti-hijacking safeguards. If the improvements were not made, the airport was in danger of losing "its certification as a commercial airfield and Western and Frontier Airlines probably would stop serving the Yellowstone National Park gateway." As one paper put it, "if West Yellowstone residents want continued air service, they may have to cough up funds to improve their airport or put wings on their snowmobiles."\footnote{51 \"Airport Request Goes Into Tailspin\" 3 March 1973 \textit{The Montana Standard}; \"Ever Seen Snowmobiles Fly\" 4 March 1973 \textit{The Independent Record}.} Eventually, the state appropriated $40,000 to construct a crash fire building.\footnote{52 \"Capitol, UM Projects Take Bulk of $4.3 Million in Building Funds\" 22 May 1973 \textit{Great Falls Tribune [Great Falls, Montana].}}

Money troubles continued in 1974 and for years thereafter. In 1974, the only state-owned air carrier port in Montana was open five months and had six commercial flights each day. Nonetheless, it financial reports indicated that it barely broke even that season. Additionally, the Yellowstone Airport manager warned that the airport might have to close during the 1975 season unless it received $195,000 to seal-coat the runway.\footnote{53 \"West Yellowstone\" 24 December 1974 \textit{Great Falls Tribune}.}
Many thought the airport should be opened on a year-round basis, even though Western and Frontier Airlines seemed uninterested in year-round scheduled flights. They included Ski Yellowstone, a proposed recreational complex, Yellowstone Park Company, and many residents and community businessmen. To do so, the major costs were to winterize and heat the terminal building and for equipment to remove the heavy snowfall from the runway. MAC owned and operated eleven airports in Montana, but ten of them were for emergency and general aviation. The Yellowstone Airport was the only one used by commercial airlines, such as Frontier and Western. However, MAC did not have the estimated $2.78 million in capital expenditures and an additional $555,000 in operational costs to operate the Yellowstone Airport year round in order to meet business, tourism, freight, mail, and medical needs. Help was sought from western district congressman Max Baucus, who explored the possibilities of securing a federal grant to supply the needed funding. The State Board of Aeronautics also indicated its willingness to help pay for a study to find out if there were enough tourists to justify operating Yellowstone Airport in the winter.\(^{54}\)

In 1978, state and federal funding for $690,000 was approved for improvements to the Yellowstone Airport with over eighty-three percent coming from the federal government.\(^{55}\) The monies were used in 1980 to repair the airport's main runway in July and August that year. Western Airline cancelled its flights while the runway was closed but Frontier Airlines agreed to land on the airport's taxiway during this period.\(^{56}\) The next year, an additional $161,036 was expended for runway and taxiway lighting repairs because gophers had eaten away insulation on underground wiring for the lighting system.\(^{57}\) Also in 1980 a generator building and 500 gallon diesel fuel tank were installed on the airport grounds to keep the runway and taxiway lights running in the event of a power outage.

The year 1979 was the busiest year ever at the Yellowstone Airport. That year, 23,563 scheduled passengers were boarded and there were four daily round trips, two each to Salt Lake City and Denver. However, starting in 1983, business declined to just 15,000 passengers and there were only two daily round-trip flights to Yellowstone. Three reasons appeared to account for the decline: a decline in foreign visitors caused by the devaluation of foreign currency against the strength of the U.S. dollar, lack of consistent airline service to Yellowstone, and the lack of a solid marketing plan for the Yellowstone Airport area. This meant reduced income for car rental businesses, private aviation service, the gift shop, and the entire community.\(^{58}\) Airport ownership came into question when MAC's contract was set to expire. In 1987, an amendment was attached to the main House appropriations bill, directing the Commerce Department to transfer ownership of the 25-year old airport to the Town of West Yellowstone or another local public authority willing to operate the airport. If no public entity was willing to take over, the legislature proposed closing the airport.\(^{59}\)

The airport did not close and MAC continued to own and operate the Yellowstone Airport after 1987. In the spring of that year, Western Airlines merged with Delta Airlines and became known as Delta.\(^{60}\) Thereafter, Skywest Airlines, operating as Delta Connection, with Embraer EMB-120 Brasilia turboprops, served the

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\(^{55}\) "Budget Proposal Includes $29.8 Million for Buildings" 27 December 1978 Great Falls Tribune.

\(^{56}\) "Big Sky Plans to Cut Service" 15 May 1980 Great Falls Tribune.

\(^{57}\) "Prison Guard Tower Bid Goes to Sletten" 27 September 1981 Great Falls Tribune.

\(^{58}\) "Air Traffic to West Yellowstone Falls" 4 August 1984 Great Falls Tribune.

\(^{59}\) "Airport Ownership Plan Criticized" 27 July 1988 Great Falls Tribune.

\(^{60}\) "Western Closes Half Century in Montana" 29 March 1987 Great Falls Tribune.
airport on a seasonal basis. In June 2015, Skywest upgraded its seasonal Delta Connection service to Yellowstone Airport with Canadair CRJ-200 regional jet service, thus marking the first time the airport has had jet service in nearly thirty years.
INFORMATION SOURCES/BIBLIOGRAPHY
See footnotes in the “History of Property” section above for specifics; however the sources include the following:

Montana and the Sky
West Yellowstone Historic Center
The Salt Lake Tribune
The Ogden Standard-Examiner
The Daily Inter Lake
Montana Butte Standard
The Independent Record
The Yellowstone Story: A History of Our First National Park
The Post Register
The Billings Gazette
The Montana Standard
The Butte Daily Post
Great Falls Tribune
Statement of Significance

Property Name: Yellowstone Airport Beacon

NATIONAL REGISTER OF HISTORIC PLACES

NRHP Listing Date:
NRHP Eligibility: ☒ Yes ☐ No ☐ Individually ☐ Contributing to Historic District ☐ Noncontributing to Historic District
NRHP Criteria: ☒ A ☐ B ☒ C ☐ D
Area of Significance: Transportation Period of Significance: 1964 - present

This property type is that of a relocated Montana airway beacon. According to the Sentinels of the Airways: Montana’s Historic Airway Beacon System multiple property documentation form as part of historic context for Montana Aviation, The Airway Beacon System in Montana, 1934-1979. The following information concerning this property type and the NRHP evaluation methods come directly from the multiple property documentation form:

National Register Criterion A: An airway beacon may be eligible for listing in the National Register of Historic Places under Criterion A if it is:

Associated with the FAA decommissioning process, establishment of the Montana Aeronautics Commission’s role in owning and maintaining beacons after 1966, and the relocation of beacons to airports, landing fields, and other locales for directive uses. The importance of beacons to rural navigation is illustrated by their numbers across Montana by mid-century. The improvement of radar and other navigational aids, however, resulted in the CAA to begin decommissioning beacons nationwide in 1951, a process that continued under the auspices of the FAA (created in 1958) into the 1970s. In Montana, the assessment process began in the early 1960s. Many of these beacons were donated by the FAA, to the MAC, local governments, and other recipients for use. A few beacons and towers were repurposed, but most were put back to work in their original capacity.

National Register Criterion C: An airway beacon in Montana may be eligible for listing in the National Register under Criterion C if it:

Was moved to its new location within the period of significance, and has therefore, acquired significance related to its relocated position. With the relocation of beacons and towers beginning in 1951 and accelerating through the mid-late 1960s, many assumed similar roles but in different locations. The relocated beacons often gained a second life for use at publicly-owned airports, landing fields, and other locations, indicating their value as a navigation tool for pilots was recognized across the state.” (Axline and Hampton, 2019)

With these significance guidelines in place it is recommended that the Yellowstone Airport Beacon is eligible for listing under Criterion A and C.
INTEGRITY (location, design, setting, materials, workmanship, feeling, association)

The Yellowstone Airport Beacon retains a high level of integrity. Though the tower was relocated to this location in the 1960’s it retains integrity of location as its period of significance includes the site’s current location. The site also retains integrity of setting, location, and association as a nighttime airway beacon. Also, even though the tower was relocated to its current location the integrity of workmanship, design, and materials are all sufficiently intact.
Property Name: Yellowstone Airport Beacon

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Property Name: Yellowstone Airport Beacon

Facing: SE

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Property Name: Yellowstone Airport Beacon  
Site Number: Error! Reference source not found.
Property Name: Yellowstone Airport Beacon

Feature # 1
Facing: Up

Description: Beacon Tower
Property Name: Yellowstone Airport Beacon
Site Number: Error! Reference source not found.

Feature # 1
Facing: Down
Description: Beacon Tower
Property Name: Yellowstone Airport Beacon

Site Map

Site Number: Error! Reference source not found.
Property Name: Yellowstone Airport Beacon

Site Number: Error! Reference source not found.
Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT

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March 2020
Abstract
Morrison Maierle, Inc. (MM) has contracted Hope Archaeology, Inc. (HAI) to conduct a Cultural Resources Inventory (CRI) of the Yellowstone Airport Terminal Area near West Yellowstone, Montana. MM is overseeing proposals for the extension of water and sewer infrastructure to the Town of West Yellowstone’s existing facilities and requested that HAI complete an inventory of the proposed water and sewer line alignments as well as a survey of the ground surface of the USFS Fire Center Complex, excluding the existing permanent structures, (Class III Survey Area 2), as well as the remaining portion of the terminal area that was not inventoried during the original investigations in 2016 (Class III Survey Area 1) (Hope and Godfrey 2019). The inventory took place within Township 13S, Range 5E, Sections 15, 21, 22, 27 and 28 containing 177.4 acres in Gallatin County, Montana. The intensive Class III cultural resource inventory was required to locate and record all cultural properties that have surface and exposed profile indications within the area. No cultural resources were observed within the current project area and no further work is recommended.
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1.0 Introduction

Morrison Maierle, Inc. (MM) has contracted Hope Archaeology, Inc. (HAI) to conduct a Cultural Resources Inventory (CRI) at the Yellowstone Airport and between the airport grounds and the townsite of West Yellowstone, Montana (Figure 1). MM is overseeing proposals for the extension of water and sewer infrastructure to the town of West Yellowstone's existing facilities and requested that HAI complete an inventory of the proposed water and sewer line alignments as well as a survey of the ground surface of the USFS Fire Center Complex, excluding the existing permanent structures, (Class Survey Area 2 in Figure 1), as well as the remaining portion of the terminal area that was not inventoried during the original investigations in 2016 (Class III Survey Area 1) (Hope and Godfrey 2019) (Figure 1). The inventory did not result in the identification of any cultural properties within the APE. The APE for the 177.4-acre CRI surveyed for under this report is located in:

T13S R5E, Sections 15, 21, 22, 27 and 28

The intensive Class III cultural resource inventory was required to locate and record all cultural properties that have surface and exposed profile indications within the area. In general, site evaluations were conducted using existing guidelines from the Montana State Historic Preservation Office (SHPO), the National Register Criteria (36 CFR 60.4), and National Park Service National Register Bulletins. This document describes the results of the field investigations.
Figure 1 – Area of Potential Effect
2.0 Literature Search

HAI conducted a file search through the Montana SHPO and received the official CRIS and CRABS reports on September 18, 2019. This file search returned results indicating that five previous investigations (six including the HAI 2016 inventory) had been conducted within the sections containing the current APE resulting in the documentation of three sites (24GA0992, 24GA1958, and 24GA1981) in the Township, Range, and Sections that contain the current survey areas; however, outside the current survey area. The location of 24GA0992 is unclear; however, the description states it is less than one meter from the frontage road within T13S R5E in the SE1/4 of Section 15, which is outside of the current APE.

Personal conversations with MM Airport Engineer, Travis Eickman, as well as an examination of the original Yellowstone Airport Plans (Yellowstone Airport West Yellowstone, MT F.A.A.P., 1963; Yellowstone Airport Terminal and Maintenance Buildings F.A.A.P., 1963) also provided a further understanding of the airfield grounds and the history of the airport. In addition, General Land Office (GLO) maps and local histories were also consulted to gain a more complete understanding of the AP.

The Great Bannock Trail (portions of which – likely in this area - were also used by the Nez Perce in 1877 on what is known as the Nez Perce (Nee-Me-Poo) National Historic Trail) is known to have existed in this general area, although the exact location of the Great Bannock Trail is not known. In 2016, Forest Service archaeologists Mike Bergstrom and Halcyon La Point analyzed the history of the Great Bannock Trail in the area with the Madison Arm of Hebgen Lake marking the southern border of their study area, approximately one mile north of the current study area (La Point and Bergstrom 2016). Their research mentions that the character of the Great Bannock Trail was a system of trailways, which together, made up a complex route. They also described what appears to be different forks of the trail that were used depending on varying weather conditions:

“His fairly detailed description of the trail near Horse Butte describes two branches used depending on the weather conditions. The “good weather branch” passed to the east of Horse Butte and headed north toward the Duck Creek valley while the “bad weather branch” followed the Madison River (to the west and north of Horse Butte) to the Great Spring Indian campsite (Replogle 1956).

Davis includes a sketch map showing the Bannock Trail heading toward the northeast to near the outlet of the South Fork Arm of Hebgen Lake where it bifurcates. One branch heads north along the west side of Horse Butte, crosses the north end of the Horse Butte Peninsula, heads toward Cory Spring along the north side of Grayling Creek, and then heads into Yellowstone National Park. The other branch heads north along the east side of Horse Butte, the swings east in the area of Rainbow Point Campground and heads toward Yellowstone National Park along the Duck Creek drainage.” (La Point and Bergstrom 2016)

While a route depicting these descriptions could not be located, a layout showing these features in relation to the Airport is provided in Figure 2 below.
The trail known as the Nez Perce (Nee-Me-Poo) National Trail was designated by Congress as a National Historic Trail in 1986. An examination of *The Nez Perce (Nee-Me-Poo) National Historic Trail Comprehensive Plan* (USDA 1990) gives a history of the trail and provides maps that indicate the general route; though there is a fair amount of conjecture as to the physical location of the trail in many places. “The abandoned segments can be located today but are often overgrown by vegetation, altered by floods, powerlines, and other man-made structures, or cross a variety of ownerships” (USDA 1990). A route that
is officially designated as part of the Nez Perce (Nee-Me-Poo) National Historic Trail runs along the Madison River to the north and east of the current APE (see Figure 3).

To-date researchers have not observed actual tread associated with either the Great Bannock Trail or the Nez Perce (Nee-Me-Poo) National Historic Trail in or near the current project area and both are believed to lack physical expression in many places. The physical evidence of the trail would be historic artifacts, axe-cut stumps, peeled trees, and wickiup remains. None of these were observed during the survey. The location of either (or both) trails in proximity to the current APE is difficult to ascertain. The physical evidence of the trail would be historic artifacts, axe-cut stumps, peeled trees, and wickiup remains (Eakin, D. and E. Horton, 2019). The maps from the Comprehensive Plan indicate the Nez Perce (Nee-Me-Poo) National Historic Trail followed the west bank of the Madison River, in general; however, the meandering nature of the Madison River along with the construction of the Hebgen Dam has likely inundated portions of both and/or either trail between Yellowstone National Park and the Targhee Pass approximately 7 miles to the west of the current APE. Descriptions place the trails to the north of the current project area. The map in *The Nez Perce (Nee-Me-Poo) National Historic Trail Comprehensive Plan* (USDA 1990) places the route for the Nez Perce (Nee-Me-Poo) National Historic Trail further south and closer to the APE (Figure 2) than the descriptions of the location for the Great Bannock Trail, although it is possible that this is the same (or similar) route as the “bad weather branch” of the Great Bannock Trail as described above.
3.0 Environmental and Cultural Setting

The APE is located within the lodgepole pine-Douglas fir forest vegetative rangeland type (Payne 1973) near Hebgen Lake and the Madison River (Figure 1). The immediate area is characterized by dense forest of lodgepole pines with and undercarriage of whortleberry and snowy aster with the soil’s parent material defined as sandy and gravelly alluvium (USDA 2017). The soils within the APE generally belong to the Typic Cryochrepts Complex, obsidian sand substratum (USDA 2017). The closest source of permanent water is the Madison River, located approximately 0.5 miles east of the APE. The project elevation is at 6,645 feet.
above sea level. The mean annual precipitation in the area ranges from 20 to 35 inches with 50 to 70 frost-free days per year. The mean air temperature ranges from 37 to 43 degrees Fahrenheit. At the time of the survey, the direct APE exhibited light fall vegetation (see Figure 4, 5, 6, and 7). The area is vegetated with lodgepole pine trees, snowy aster, whortleberry, reedgrass, elk sedge, and bluegrass. Within the direct APE, the ground varied between being heavily disturbed in the area within the airport grounds by tree clearing for the inception, growth, and maintenance of the airport over the years; however, much of the linear survey between the airport and the Town of West Yellowstone was relatively undisturbed (see Figures 5 and 6). In addition, large portions of the APE have been previously logged, much of it in the 1960s in support of the construction of the airport and USFS Fire Center Complex, including the access roads. Logged areas also bordered the Madison Addition on the west and north boundaries at the time of airport construction in the 1960s; however, logging was not apparent along the jeep trail based on aerial photos from the time.

Figure 4 - Environmental Overview and example of ground disturbance along established roads
Figure 5 - Example of survey area within the linear survey areas immediately north and west of West Yellowstone

Figure 6 - Example of the variation of ground surface visibility with Area 1 of the APE
The history and cultural setting of the project area is thoroughly discussed and detailed in the original report produced by HAI concerning the Yellowstone airport, *Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT* (Hope and Godfrey 2019) and will not be repeated here. However, the histories of the Great Bannock Trail and Nez Perce (Nee-Me-Poo) National Historic Trail were not included in that document and will be addressed here.

**The Great Bannock Trail**

The Great Bannock Trail was an aboriginal travel corridor approximately 200 miles in length stretching from the Camas Meadows in Idaho, across Targhee Pass and into the Madison River Valley, over the Gallatin Range and into the Gardiner River drainage, up the Yellowstone River and the Lamar River, to the Absaroka Mountains, and finally to the Clark Fork of the Yellowstone River and Shoshone River in Wyoming. Although named after the Bannocks of the Snake River Plains, the trail was used by several other tribes including the Flathead, Fort Hall and Wyoming Shoshoni, the Lemhi, and the Nez Perce along with early-day white explorers and trappers (La Point and Bergstrom 2016).

A two-fold explanation has been suggested for the popularity in use of the Great Bannock Trail by Native Americans. Buffalo populations began declining in the upper Snake River Valley of Idaho prior to 1840,
necessitating distant travel to areas where buffalo were plentiful. In possession of horses, several tribes were able to make annual hunting trips to these distant places. The trail was known as one of four routes used by the Bannock to reach the eastern buffalo ranges of the Northern Plains and the Missouri River headwaters (Haines 1962, Madsen 1958). For at least forty years ending in 1878 with the Bannock War, tribes used the Bannock Trail for access to drainages such as the Madison, Gallatin, Yellowstone, Stillwater, Clarks Fork, and Shoshone valleys and through them to the Plains buffalo ranges (Haines 1962). It was considered a major historic transportation conduit between the Basin and the Northwest Plains (La Point and Bergstrom 2016). Additionally, Davis postulates that obsidian may have been transported from the Obsidian Cliff Plateau along trails (Davis et al. 1995) and the Great Bannock Trail appears to be one likely candidate (La Point and Bergstrom 2016).

Use of the Great Bannock Trail has been suggested to have occurred for at least forty years—from approximately 1838 to 1878 (Haines 1962). Nez Perce Chief Joseph, along with approximately 750 followers, traveled portions of this route in 1877 while being pursued by U.S. Army General Oliver O. Howard (Howard and McGrath 1969, Roscoe 2005). Less than a year later hostile Bannocks used the trail in 1878 in an attempt to reach hunting grounds in Wyoming (Bonney and Bonny 1970). Replogle talked with individuals around the town of West Yellowstone who stated they drove cattle on the trail during the late 1890s and early 1900s (Replogle 1956, La Point and Bergstrom 2016).

**Nez Perce National Historic Trail**

The Nez Perce (Nee-Me-Poo) National Historic Trail extends approximately 1,170 miles on a circuitous route from the vicinity of Wallowa Lake, Oregon, to the Bear’s Paw Battlefield near Chinook, Montana.

It is named for the 1877 flight of the Nez Perce from their homelands while pursued by U.S. Army Generals Howard, Sturgis, and Miles. Chief Joseph, Chief Looking Glass, Chief White Bird, Chief Ollokot, Chief Lean Elk, and others led nearly 750 Nez Perce men, women, and children and twice that many horses over 1,170 miles through the mountains, on a trip that lasted from June to October of 1877. This route was used in its entirety only once; however, component trails and roads that made up the route bore generations of use prior to and after the 1877 flight of the nontreaty Nez Perce (USDA 1990).

Traditionally, the Nez Perce were at peace with the white man who settled the mountains and valleys of southeastern Washington, northeastern Oregon, and northcentral Idaho. Influenced by increased settlement and mounting public pressure, Washington Territorial Governor, Isaac Stevens, negotiated the 1855 reservation treaty with the Nez Perce chiefs who, in general agreement, inscribed 5,000 square miles of traditional homeland as the reservation. However, from 1855 to 1862, settlers and miners continued to encroach upon the Nez Perce homeland.

When gold was discovered on the reservation, prospectors entered without regard for treaty or reservation boundary and made nearly unbearable depredations on Nez Perce land, livestock, and the Nez Perce themselves. The United States Government engaged the Nez Perce in new treaty negotiations in 1862 and 1863. Nearly all tribal bands were represented (USDA 1990).

In 1863, the US government proposed to shrink the reservation by 90%. The tribes that lived outside the newly proposed boundaries left the treaty council in protest, but dozens of Nez Perce leaders who already
resided within the newly proposed reservation boundaries signed the new treaty, which was then ratified in 1867 (Malone et al 1991). It is said that some chiefs signed as representing the Nez Perce Tribe, but their authority to do so was contested by Old Joseph (father of Joseph and Ollokot), White Bird, Looking Glass, and other chiefs of the Upper Nez Perce. A political-religious division of the tribe developed. Those who signed were lauded as the Christian "treaty" Indians; those who did not sign became known as the "nontreaty" Nez Perce. The nontreaty Nez Perce remained on their traditional homeland, but white settlement of the Snake and Clearwater River bottoms and Wallowa Valley continued (USDA 1990).

Finally in May 1877, in response to an ultimatum, the nontreaty chiefs decided to move onto the reservation at Lapwai rather than risk war with the Army (USDA 1990). On the way, in June of 1877, tensions between the US Army and nontreaty Nez Perce came to a head when a small band of Nez Perce warriors from the White Bird band killed several Euro-American settlers in response to previous conflicts with white settlers that had resulted in the deaths of some of the band’s family members (Josephy 1965). Their violence and the Army’s subsequent attack at White Bird Canyon ended the hope for the nontreaty Nez Perce to peacefully move to the reservation at Lapwai, and the flight of the nontreaty Nez Perce began (USDA 1990).

The nontreaty Nez Perce bands led by Joseph and his brother Ollokot considered trying to appeal to the US government to come to a peaceful solution; however, the tensions of the time were too great, and flight was determined to be the better option. Joined by additional bands led by White Bird and Looking Glass, the group fled east across Idaho. Numbering over 800 men, women, and children, left their traditional homeland and fled east over Lolo Pass into Montana with the ultimate goal of obtaining sanctuary with the Crow Indians in south central Montana. However, once they were rebuffed by the Crow Nation, escape to Canada to seek refuge with the Lakota, led by Sitting Bull, was determined as the final, desperate option for survival and freedom (Malone et al 1991).

From the deeply incised Columbia Plateau, across the Continental Divide and a succession of ranges, canyons and valleys, through forests and plains, across thermal areas and mighty rivers, the Nez Perce Trail winds through some of the most rugged and spectacular scenery in western America. Yet the route was not chosen by the Nez Perce for its scenery. From Ft. Fizzle onward, expediency and strategic advantage dictated their course (USDA 1990). The flight of the Nez Perce is also known as the Nez Perce War, and skirmishes were common along the route - between the Nez Perce and the Army, but also with volunteers and armed settlers. Some skirmishes were also a result of delaying actions to allow the elderly, women, and children time to escape the military.

The Nez Perce passed near the APE in late August 1877. On August 9th, the military caught up with the Nez Perce at the Big Hole River in Montana. After a twenty-four-hour battle with heavy casualties on both sides, the Nez Perce moved rapidly from the Big Hole Battlefield through the upper Big Hole, south over Bannock Pass and re-entered Idaho (Malone et al 1991, USDA 1990). On August 20th, the Nez Perce and 260 men of the US Army clashed at Camas Meadows about thirty-six miles southwest of the current APE. The Nez Perce took the offensive and captured nearly all of the Army pack mules. This slowed the Army’s advance and allowed the Nez Perce to escape over Targhee Pass into Yellowstone country. They likely
used portions of the Great Bannock Trail along their route in this area. The Nez Perce crossed into Yellowstone Park just to the east of the current APE.

After crossing the Park, the Nez Perce managed to escape a plan to block escape routes onto the plains as the Army pushed in on them from Yellowstone National Park. Soon after escaping the “Absaroka Blockade”, the Nez Perce learned that the Crows had no intentions of giving asylum or assistance; rather, their intentions were more along the lines of stealing the Nez Perce horses. For the Nez Perce, the only hope for peace seemed to be to follow what Sitting Bull and the Sioux had done a year earlier -- go to Canada (USDA 1990). However, their flight was ended in Montana’s Bear’s Paw Mountains near Chinook, Montana, on October 5, 1877. Chief Joseph’s famous surrender speech includes the words, “From where the sun now stands, I will fight no more forever.” The terms of surrender stated that if the Nez Perce gave up their arms, they would be returned to the Lapwai Reservation with what stock they had left. However, the apparent terms for surrender were never kept. Eight years passed before Joseph and 267 of the 400 Nez Perce who surrendered with him were allowed to return to the Pacific Northwest. Joseph himself was never again permitted to settle on his homeland or the reservation at Lapwai (United Stated Department of Agriculture [USDA], n.d.).

Congress passed the National Trails System Act in 1968, establishing a framework for a nationwide system of scenic, recreational, and historic trails. The Nez Perce (Nee-Me-Poo) National Historic Trail was added to this system by Congress as a National Historic Trail in 1986. Nee-Me-Poo is the traditionally accepted name of the Nez Perce Tribe which means “The People” (USDA 1990).

4.0 Methods

Between September 26 and November 8, 2019, HAI conducted the Class III Cultural Resource Inventory under intermittently windy, cool, and sunny weather conditions. Shane Hope surveyed the 177.4-acre APE (see Figure 1) using transects spaced no greater than 30m apart (which is also the width of the linear survey areas for the water and sewer lines). Linear survey areas are generally conducted by meandering across the corridor and actively identifying areas of higher probability for identifying cultural resources such as: rodent burrow backfill piles, areas of higher ground surface visibility, near mature trees that may exhibit cultural modifications, in disturbed areas that may indicate either historic or prehistoric activities, and along actively eroding areas and cut banks that clearly exhibit the subsurface deposition of the survey area.

The standing structures within the USFS Fire Center Complex grounds (Class Survey Area 2 in Figure 1) were not inventoried as part of the current effort. Ground surface visibility ranged from 5 to 99 percent (see Figures 2, 3, and 4). Along roadways associated with the proposed water line route and in the heavily disturbed areas near to the taxiway infield and runway the ground surface visibility reached 99% (see Figures 1 and 4). In areas where the tree canopy is intact (such as points of Area 1 and 2 as well as portions of the water line survey immediately west and north of the town of West Yellowstone) the ground surface visibility decreased to 5% in areas due to the intact layer of pine needle duff (see Figures 3 and 4). No subsurface testing was performed in the course of this project survey.
Prehistoric sites are defined by the presence of artifacts (beads, pottery, lithics, fire cracked rock, bone) totaling five or more items within any 30-meter diameter or the presence of any prehistoric feature (ring, arc, or cairn). The presence of less than five non-diagnostic prehistoric artifacts within a 30-meter diameter is identified as an isolated find (IF). No prehistoric cultural materials were observed during the current investigations.

Historic resource sites must be 50 years or older, except under special circumstances of exceptional historic value. Any feature (i.e., foundation, structure, sheepherder’s monument) and/or five or more artifacts (i.e., glass, metal, or ceramics) within a 30-meter diameter define them. No historic cultural materials were observed during the current investigations.

5.0 Inventory Results
No cultural resources nor any sign of the Great Bannock Trail or the Nez Perce (Nee-Me-Poo) National Historic Trail were identified during the current inventory. The physical evidence of the trail would be historic artifacts, axe-cut stumps, peeled trees, and wickiup remains (Eakin, D. and E. Horton, 2019). None of those were observed during the survey. The structures within the USFS Fire Center Complex grounds (Class Survey Area 2 in Figure 1) were not inventoried as part of the current effort and any modifications to these buildings will require further cultural investigations before proceeding.

6.0 Summary and Recommendations
A Class I file search did not identify any previously recorded archaeological sites within the survey areas and the field survey did not identify any cultural resources (Figure 1). No further cultural work is recommended in connection with this project. No effects to the culturally sensitive linear sites related to the Great Bannock Trail or the Nez Perce (Nee-Me-Poo) National Historic Trail will occur since the trails are located outside of all proposed construction areas and no physical remains of the trails were identified by the pedestrian survey. Consultation with the Shoshone-Bannock and the Nez Perce Tribes should be pursued if the trail alignments become apparent during any future ground disturbing activities.
References
Bonney, Orrin H. and Lorraine Bonney.

Davis, Leslie B., Stephen A. Aaberg, and James G. Schmitt.

Eakin, Dan and Elizabeth Horton

Eickman, T.
   2019 Personal communication with Travis Eickman, Senior Airport Engineer with Morrison-Maierle.

Haines, Aubrey L.

Hope, S. and Godfrey, A.
   2019 Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT. On file with HAI, MM, and the MT SHPO.

Howard, Helen Addison and Dan L. McGrath.

Josephy, Alvin M., Jr.

La Point, H. and M. Bergstrom

Madsen, Brigham D.

Malone, Michael P., Richard B. Roeder, and William L. Lang

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   1973 Vegetative Rangeland Types in Montana. Montana Agricultural Experiment Station, Bulletin 671, Bozeman, MT.
Replogle, Wayne F.

Roscoe, Will.
2005. The Indian Midwife, Some historical notes and comments for the descendants of William and Emma Patt. San Francisco, California.

USDA Forest Service

United States Department of Agriculture

USDA - Web Soil Survey

Yellowstone Airport F.A.A.P

Yellowstone Airport Terminal and Maintenance Buildings F.A.A.P.
September 14, 2020

Ms. Dian Stilson, P.E.
FAA Helena Airport District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602-1213

Ref: Determinations of Eligibility and Effect on Historic Properties due to Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, Montana

Dear Ms. Stilson,

Thank you for consulting with the Montana State Historic Preservation Office regarding the project listed above. SHPO concurs with your determination of eligibility that both the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are eligible for the National Register of Historic Places under Criteria A and C. In addition, SHPO concurs with your finding that the removal of these two features under the proposed actions as stated in your consultation package will constitute an adverse effect to these historic properties.

While SHPO is aware that there were informal discussions regarding possible mitigation measures to offset this adverse effect, SHPO would like to invite FAA to draft some possible mitigation efforts to begin the collaborative process of drafting a MOA.

Please do not hesitate to contact me regarding this letter or its contents. I can be reached at 406.444.7717 or at eric.newcombe@mt.gov.

Sincerely,

Eric Newcombe, M.A.
Historic Architecture Specialist
State Historic Preservation Office
Montana Historical Society
P.O. Box 201202/1301 E. Lockey Avenue
Eric.Newcombe@mt.gov
(406) 444-7717
www.montanahistoricalsociety.org
August 20, 2020

Ms. Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602

Ref:  Construction of a New Airport Terminal and Associated Improvements at Yellowstone Airport
West Yellowstone, Gallatin County, Montana
ACHP Project Number: 15782

Dear Ms. Stilson:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, of our regulations, “Protection of Historic Properties” (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Montana State Historic Preservation Officer (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Anthony Guy Lopez at (202) 517-0220 or by email at alopez@achp.gov.

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs
Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form

MS Word format

Send to: e106@achp.gov

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. Purpose of notification. Indicate whether this documentation is to:
   - [x] Notify the ACHP of a finding that an undertaking may adversely affect historic properties
   - [x] Invite the ACHP to participate in a Section 106 consultation
   - [x] Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
   - [ ] Supply additional documentation for a case already entered into the ACHP record system
   - [ ] File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
   - [ ] Other, please describe
      Click here to enter text.

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below):

None previously filed

3. Name of federal agency (If multiple agencies, list them all and indicate whether one is the lead agency):

   Federal Aviation Administration – lead agency;

   U.S. Forest Service – Cooperating Agency

4. Name of undertaking/project (Include project/permit/application number if applicable):

   Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, Montana

5. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

   West Yellowstone, Gallatin County, Montana – Yellowstone Airport (WYS). The Airport Sponsor is the State of Montana – Department of Transportation (MDT)
6. **Name and title of federal agency official and contact person for this undertaking**, including email address and phone number:

Diane Stilson, P.E.

Civil Engineer / Environmental Protection Specialist

Diane.stilson@faa.gov

(406) 441-5411

II. **Information on the Undertaking***

7. **Describe the undertaking and nature of federal involvement** (if multiple federal agencies are involved, specify involvement of each):

The Federal Aviation Administration (FAA) is examining the environmental impacts due to the proposed construction of a new airport terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process.

The Airport Sponsor, the State of Montana - Department of Transportation (MDT), is preparing an Environmental Assessment (EA) for submission to the FAA to meet the requirements of NEPA. Funding for the project is anticipated to be largely through the Airport Improvement Program (AIP) and the Coronavirus Aid, Relief, and Economic Security (CARES) Act as well as constitute a change to the Airport's Airport Layout Plan (ALP). As the undertaking would include improvements on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA.

The Proposed Action would construct an approximate 29,000 square foot (SF) terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. Associated improvements will also provide an opportunity to improve the airport and the neighboring USFS Jump Base with upgraded water and sewer, as well as new fiber optic infrastructure.

Details of the undertaking are provided in the attached project description and layouts.

8. **Describe the Area of Potential Effects (APE):**

The Area of Potential Effect (APE) corresponds to the terminal area and areas of disturbance for utility corridors as shown on the attached layouts.
9. Describe steps taken to identify historic properties:

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR) for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. No cultural properties were identified in the CRI; however, two historic sites were identified. These historic sites include the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), both of which were documented and recommended in the CRI as eligible to the National Register of Historic Places (NRHP).

The FAA contacted Tribes with historical ties to this area in letters dated August 29, 2019, in order to seek input on properties of cultural or religious significance that may be affected by the undertaking and to initiate Government-to-Government consultation. Eight Tribes were contacted, including the Blackfeet Nation, Coeur d’Alene Tribe, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Kootenai Tribe of Idaho, Nez Perce Tribe, and the Shoshone Bannock Tribes. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) to the project area.

An Addendum to the CRI (Addendum) was conducted in order to examine the routes of the potential extension of water, sewer, and fiber optic lines from the town of West Yellowstone, Montana, to WYS and the USFS Jump Base. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the NPNHT. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural or historic resources, nor any sign of the Great Bannock Trail or NPNHT.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

The FAA considered the recommendations made in the CRI and the Addendum, and concurs with the recommendations regarding historic properties in these documents. The FAA has therefore determined that the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are both eligible to the NRHP under Criteria A and C.

Yellowstone Airport Terminal (24GA1958)

The terminal design (approved by the National Park Service) displays modern stylings combined with western rustic elements (Western Modernism). Bids for the terminal were received in 1964 and the structure was opened for service in 1965. The airport terminal has a canted overhang roof supported by steel beams that, at the time of construction, probably gave the arriving contemporary passenger a feeling of strength, functionality, and efficiency. Understandably, the Yellowstone Airport’s branding focused on the airport’s high elevation and significance as Yellowstone National Park’s west entrance.
With National Park Service funding through the Department of Interior and given its date of construction in 1964 and 1965, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy.

Yellowstone Airport Beacon (24GA1981)

The tower is comprised from 3” pieces of angle steel bolted together at each connection point. The base of the tower measure 12’ square and is orientated NE to SW. The tower is 51 feet tall and has a small platform at the top measuring approximately 4 feet square, which houses the beacon apparatus. A steel ladder without a safety cage is attached to the SE elevation and gives access from the ground to the platform. This beacon tower was relocated to the airport grounds at the same time as the construction of 24GA1958 (the Yellowstone Airport Terminal), circa late 1964 or early 1965, though it is not clear where the tower originated. Jon Axline, historian for the Montana Department of Transportation, suggests that the tower may have been relocated from the old West Yellowstone Airport, which would make logistical and monetary sense given the relative proximity of the two airport sites. In addition, Mr. Axline believes the tower appears to be of the same construction style as those constructed in the 1930s. While the beacon tower is likely of the original construction style as it was pre-relocation, the rotating and lighted beacon equipment has gone through numerous changes as electrical equipment has expended its useful life. While records of the electrical modifications are not available, airport staff noted that modifications have been made as recently as, approximately, 2009.
11. Describe the undertaking’s effects on historic properties:

The FAA has determined that the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are both eligible to the NRHP under Criteria A and C. Both of these sites are proposed for removal under the proposed project actions, which will constitute an Adverse Effect to Historic Properties. Informal discussion of this has been conducted with the Montana SHPO to discuss a mitigation strategy for inclusion in a Memorandum of Agreement (MOA). Formal Section 106 consultation was initiated with SHPO on August 3, 2020.

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

The Proposed Action being evaluated in an Environmental Assessment includes removal of both the Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower.

The Montana Department of Transportation – Aeronautics Division (MDT – Aeronautics) (Airport Sponsor) considered a full range of alternatives to address the deficiencies and needs at WYS. These alternatives include taking no action to resolve the identified deficiencies, and various alternatives to address terminal and Airport needs.

A 2015 Master Plan and the 2019 Terminal Area Narrative Report identified deficiencies in the existing terminal facilities at WYS and evaluated alternatives to address these deficiencies. The alternatives specific to the terminal included: rehabilitating the terminal building in place, constructing a new terminal building and repurposing the existing terminal, and alternatives involving the construction of a new terminal building and demolition of the existing terminal.

Ultimately, as discussed in Chapter 3 of the Environmental Assessment (not yet released for public comment), taking no action, rehabilitating the terminal in place, or constructing a new terminal and repurposing the existing terminal either did not address the purpose and need or were not feasible
alternatives.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawaiian organizations, or the public, including any correspondence from the SHPO and/or THPO.

* see Instructions for Completing the ACHP e106 Form

The FAA contacted Tribes with historical ties to this area in letters dated August 29, 2019, in order to seek input on properties of cultural or religious significance that may be affected by the undertaking and to initiate Government-to-Government consultation. Eight Tribes were contacted, including the Blackfeet Nation, Coeur d’Alene Tribe, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Kootenai Tribe of Idaho, Nez Perce Tribe, and the Shoshone Bannock Tribes. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) to the project area.

An Addendum to the CRI (Addendum) was conducted in order to examine the routes of the potential extension of water, sewer, and fiber optic lines from the town of West Yellowstone, Montana, to WYS and the USFS Jump Base. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the NPNHT. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural or historic resources, nor any sign of the Great Bannock Trail or NPNHT.

In letters dated March 20, 2020, the Cultural Resources Investigation and the Addendum were sent to the Tribes that were previously contacted in August of 2019 to again extend the invitation for Government-to-Government consultation and seek input on properties of cultural or religious significance that may be affected by the Proposed Action. The Nez Perce Tribe responded that the impact of this project cannot be determined without ethnographic studies and interviews with elders to obtain their memories and recollections passed to them regarding the Nez Perce experience in this area due to the 1877 flight of the Nez Perce from their homelands while pursued by the U.S. Army. The Confederated Salish and Kootenai Tribes of the Flathead Reservation and Shoshone Bannock Tribes confirmed that they had no additional comments regarding the project; the other Tribes did not respond.

Consultation with the Nez Perce continued in the form of several telephone conferences with MDT, the FAA, and FS in the spring of 2020. The MDT, FAA, and the USFS agree that while the location of the undertaking falls outside the designated location of the NPNHT, the events of 1877 were a tragic and significant event in which approximately 800 Nez Perce passed through the general area as they were pursued by the U.S. Army. As noted by the Nez Perce Tribal Historic Preservation Officer (THPO), the importance of finding remaining artifacts from the flight of the Nez Perce is over-shadowed by the impact of the events themselves upon the Nez Perce of the time, and lasting impacts of such events on current Tribal members. While there was no physical evidence of this event found in the project area; as requested by the Nez Perce and agreed to by MDT and the Federal Agencies, ethnographic studies are the appropriate means to determine if there will be adverse impacts on the Tribe due to the undertaking. However, ethnographic studies can often take years to accomplish properly; especially in consideration of the current environment of COVID-19. As suggested by the Nez Perce THPO and allowed by FAA Order 1050.1P when effects on historic properties cannot be fully determined prior to the approval of an undertaking, a Programmatic Agreement (PA) is proposed to be developed in order to conduct ethnographic studies and recommend mitigation elements if adverse effects to the Nez Perce Tribe or the NPNHT are identified. Details of the PA will be coordinated with SHPO, Nez Perce, MDT, FAA, and the
USFS; and the Nez Perce will be a signatory on the document.

Informal discussions regarding the NRHP-eligible terminal and beacon tower have taken place with Montana SHPO since the summer of 2019, including an in-person meeting with MDT, FAA, and SHPO in December 2019 to discuss adverse effects and a mitigation strategy for inclusion in an MOA. Formal section 106 consultation was initiated with SHPO in a letter dated August 3, 2020.

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP’s review response.

Section 106 Consultation was formally initiated with MT SHPO on August 3, 2020; however, informal discussions regarding adverse impacts to the terminal and beacon tower have taken place since summer 2019. A meeting to discuss a potential mitigation strategy for inclusion in an MOA was held in December 2019.

As stated in response to question #13, a Programmatic Agreement (PA) is proposed to be developed in order to conduct ethnographic studies and recommend mitigation elements if adverse effects to the Nez Perce Tribe or the NPNT are identified. Details of the PA will be coordinated with SHPO, Nez Perce, MDT, FAA, and the USFS; and the Nez Perce will be a signatory on the document.

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

Not at this time. Once ready for release, the draft EA will be made available for public comment.

A public meeting was held at WYS to discuss the proposed improvements in September 2019.

16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

The EA for terminal improvements is listed on the dashboard.


The following are attached to this form (check all that apply):

☐ Section 106 consultation correspondence (CAN BE PROVIDED IF REQUESTED)

☒ Maps, photographs, drawings, and/or plans

☐ Additional historic property information

☐ Consulting party list with known contact information

☐ Other: Click here to enter text.
U. S. Department of Transportation  
Helena Airports District Office  
2725 Skyway Drive, Suite 2  
Helena, MT 59602-1213

Federal Aviation Administration

August 3, 2020

Pete Brown  
State Historic Preservation Officer  
The Montana Historical Society  
1301 Lockey Ave  
Second Floor  
Helena, MT 59620-1201

Subject: Initiation of Section 106 Consultation and Determinations of Eligibility and Effect on Historic Properties due to Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, Montana

Dear Mr. Brown:

The Federal Aviation Administration (FAA) is examining the environmental impacts due to the proposed construction of a new airport terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and terminal layouts are enclosed with this letter. The Area of Potential Effect (APE) corresponds to the terminal area and areas of disturbance for utility corridors as shown on the attached layouts. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The FAA has spoken informally with your staff regarding the historic concerns from the undertaking, but this letter is being sent to formally initiate Section 106 consultation.

The Airport Sponsor, the State of Montana - Department of Transportation (MDT), is preparing an Environmental Assessment (EA) for submission to the FAA to meet the requirements of NEPA. As the undertaking would include improvements on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA.

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR) for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. No cultural properties were identified in the CRI; however, two historic sites were identified. These historic sites include the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), both of which were
documented and recommended in the CRI as eligible to the National Register of Historic Places (NRHP).

The FAA contacted Tribes with historical ties to this area in letters dated August 29, 2019, in order to seek input on properties of cultural or religious significance that may be affected by the undertaking and to initiate Government-to-Government consultation. Eight Tribes were contacted, including the Blackfeet Nation, Coeur d’Alene Tribe, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Kootenai Tribe of Idaho, Nez Perce Tribe, and the Shoshone Bannock Tribes. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) to the project area.

An Addendum to the CRI (Addendum) was conducted in order to examine the routes of the potential extension of water, sewer, and fiber optic lines from the town of West Yellowstone, Montana, to WYS and the USFS Jump Base. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the NPNHT. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural or historic resources, nor any sign of the Great Bannock Trail or NPNHT.

Both the CRI and Addendum and any associated site forms will be uploaded to the Montana Cultural Resource Database.

The FAA considered the recommendations made in the CRI and the Addendum, and concurs with the recommendations regarding historic properties in these documents. The FAA has therefore determined that the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are both eligible to the NRHP under Criteria A and C. Both of these sites are proposed for removal under the proposed project actions, which will constitute an Adverse Effect to Historic Properties. Informal discussion of this has been conducted with the Montana SHPO to discuss a mitigation strategy for inclusion in a Memorandum of Agreement (MOA).

In letters dated March 20, 2020, the CRI and the Addendum were sent to the Tribes that were previously contacted in August of 2019 to again extend the invitation for Government-to-Government consultation and seek input on properties of cultural or religious significance that may be affected by the Proposed Action. The Nez Perce Tribe responded that the impact of this project cannot be determined without ethnographic studies and interviews with elders to obtain their memories and recollections passed to them regarding the Nez Perce experience in this area due to the 1877 flight of the Nez Perce from their homelands while pursued by the U.S. Army. The Confederated Salish and Kootenai Tribes of the Flathead Reservation and Shoshone Bannock Tribes confirmed that they had no additional comments regarding the project; the other Tribes did not respond.

MDT, FAA, and the USFS agree that while the location of the undertaking falls outside the designated location of the NPNHT, the events of 1877 were a tragic and significant event in which approximately 800 Nez Perce passed through the general area as they were pursued by the U.S. Army. As noted by the Nez Perce Tribal Historic Preservation Officer (THPO), the importance of finding remaining artifacts from the flight of the Nez Perce is over-shadowed by the impact of the events themselves upon the Nez Perce of the time, and lasting impacts of such
events on current Tribal members. While there was no physical evidence of this event found in the project area; as requested by the Nez Perce and agreed to by MDT and the Federal Agencies, ethnographic studies are the appropriate means to determine if there will be adverse impacts on the Tribe due to the undertaking. However, ethnographic studies can often take years to accomplish properly; especially in consideration of the current environment of COVID-19. As suggested by the Nez Perce THPO and allowed by FAA Order 1050.1F when effects on historic properties cannot be fully determined prior to the approval of an undertaking, a Programmatic Agreement (PA) is proposed to be developed in order to conduct ethnographic studies and recommend mitigation elements if adverse effects to the Nez Perce Tribe or the NPNHT are identified. Details of the PA will be coordinated with SHPO, Nez Perce, MDT, FAA, and the USFS; and the Nez Perce will be a signatory on the document.

Please review the enclosed documentation and provide either your concurrence or non-concurrence on FAA’s determinations on historic properties and the proposed strategy for addressing the Nez Perce’s concerns regarding the NPNHT. You can provide your response, comments, or recommendations to me at diane.stilson@faa.gov or send them to me at the following address:

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

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

The Advisory Council of Historic Preservation (ACHP) is being notified that we will be developing an MOA and a PA for this project.

Thank you in advance for any comments or information you have to offer, and we look forward to working with you to develop an MOA and PA.

Sincerely,

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

Enclosures:
- Project Description and Project Layouts
- Letters sent to Tribes dated August 29, 2019
- Letters sent to Tribes dated March 20, 2020

cc: (Via e-mail)
- Jason Brey, District Ranger, U.S. Forest Service
- Jeff Kadlec, WYS Airport Manager
- Tim Conway, Administrator, Montana Aeronautics Division
- Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
- HLN ADO
Project Description:

The Montana Department of Transportation – Aeronautics Division (MDT) owns and operates the Yellowstone Airport (Airport) near West Yellowstone, Montana. MDT is proposing improvements at the Airport that would provide an updated and safe terminal building and associated improvements, and has initiated preparation of an Environmental Assessment (EA) for submission to the Federal Aviation Administration (FAA). As the Proposed Action would include improvements on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA.

The Proposed Action would construct an approximate 29,000 square foot (SF) terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. Associated improvements will also provide an opportunity to improve the airport and the neighboring USFS Jump Base with upgraded water and sewer, as well as new fiber optic infrastructure. The following improvements are required to complete the Proposed Action, with major components identified on Figures 1 and 2:

- New terminal building
  - Construct approximate 29,000 SF terminal with space for entry, lobby, seating, screening, passenger hold room, concessions, non-secure and secure area restrooms, airlines and ticketing, baggage drop/screening and handling/lobby, airport administration, Traffic Security Administration (TSA), rental cars, educational kiosks/display areas, mechanical systems and storage area(s), among other airport terminal related uses.
  - Demolish the existing airport terminal building and generator building
- Expand concrete commercial parking pad
- Reconstruct and extend airport access road
  - Reconstruct the existing access road from HWY 191 to the area fronting the existing terminal building
  - Extend the airport access road to the front of the new terminal building to facilitate access to proposed airport parking and the terminal
- Construct new parking lot infrastructure
  - Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
  - Relocate existing car wash pad facilities for two resident rental car providers
- New water infrastructure improvements
  - Extend water main infrastructure from the town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the airport. There will be a clearing width of approximately 30 feet, where necessary.
  - While USFS Jump Base site-specific water improvements are not proposed as part of the project, nor eligible for FAA funding assistance, the system is proposed to be sized to accommodate projected needs should the USFS desire to connect in the future. The water main is proposed to be routed to facilitate connection in the immediate vicinity of the USFS Jump Base.
  - Water improvements from the town are proposed to be looped to provide a continuous system versus a dead-end line to provide improved water and fire flow pressures and for redundancy in service.
- An alternative that is being carried forward for analysis in the event that connection to town facilities is somehow determined to be unfeasible is the establishment of an onsite water system (well, tank, arsenic removal system, distribution lines) that is identified as Alternative W1. Such improvements would be located on the airport property and considered for extension to serve the USFS Jump Base.

- Occasional maintenance of the new water infrastructure improvements on NFS lands. This activity would be carried out under a special use authorization that will be issued to the State or Town (depending on final ownership of infrastructure) for the improvements and their operation and maintenance. It is expected that maintenance requiring motorized use on the utility corridor would be infrequent, and would generally address maintenance of the corridor, weed management, and maintenance of barriers that will prevent public motorized use of the utility corridor.

➤ New sewer infrastructure improvements

- Extend existing gravity sewer main from existing lift station near the Snow Removal Equipment (SRE) building and Fixed Based Operator (FBO) north to a proposed lift station located near the USFS Jump Base adjoining the airport. This lift station is proposed with this project as current grades and distances are such that gravity sewer alone is not able to facilitate connection to West Yellowstone sewer treatment facilities.

- Extend a sewer force main from the proposed lift station south to the existing town of West Yellowstone sewer lagoons, located on the south end of the airport property.

- While the USFS Jump Base sanitary sewer improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accept such effluent, should the USFS desire to connect in the future.

- Most of the sewer infrastructure improvements will occur within the existing animal control fence. There will be approximately 200 feet outside of the fence at the south end before it ties into the existing lagoon.

- An alternative that is being carried forward for analysis in the event that connection to town facilities is somehow determined to be unfeasible is the establishment of an onsite Type 2 septic system with gravity and potential force main infrastructure that is identified as Alternative S1. Such improvements would be located on the airport property and considered for extension to serve the USFS Jump Base.

➤ New fiber optic infrastructure improvements

- Extend fiber optic infrastructure (buried in conduit) from the town of West Yellowstone to the new terminal, existing terminal area structures (ARFF and SRE buildings and FBO), and USFS Jump Base adjoining the airport.

- Fiber optic is proposed to be collocated in the same trench as the water line from the town of West Yellowstone. In event that the designers determine it is best to offset the utilities, fiber optic can be trenched or plowed in adjacent to the water line alignment. There is no perceived need to disturb any areas outside of those already proposed to facilitate water main installation.

- Occasional maintenance of the new fiber optic infrastructure improvements on NFS lands. This activity would be carried out under a special use authorization that will be issued to the utility company for the improvements and their operation and maintenance. As fiber and water infrastructure improvements would be collocated, refer to the description of this activity under the water infrastructure section above.
Timber clearing to facilitate subsurface utilities (i.e. water, sewer, and fiber optic)
  o Timber clearing along the Madison Addition is anticipated to require the removal of up to a 30’ width of timber at the USFS/private property interface (on USFS property) along the west and north sides of the Madison Addition, as well as the from the existing jeep trail to the intersection of Bechler Avenue.
  o In areas where infrastructure can be installed and reasonably allow timber to remain within the 30’ clearing limits, then such timber will be allowed to remain. Such determinations will be dependent on water main and fiber location in regards to timber location, timber density, and timber presence along the edges of the 30’ clearing. Along all other areas, it is anticipated that up to an additional 10’ perpendicular from existing corridors (jeep trail, airport access road, overhead power line, and Jump Base access road) will require timber removal.
  o Below is the estimated acreage of timber clearing that will take place outside of the animal control fence, broken out by clearing location:
    ▪ Temporary (new) clearings bordering the Madison Addition (30’ width anticipated) – 4.13 acres
    ▪ Jeep Trail (10’ width anticipated) – 1.18 acres
    ▪ Airport Access Road (10’ width anticipated) – 0.63 acres
    ▪ Overhead Power Line (10’ width anticipated) – 0.26 acres
    ▪ Jump Base Access Road (10’ width anticipated) – 0.47 acres
  o An estimated 3 acres of timber will be cleared within the existing animal control fence and will not impact currently available grizzly bear habitat. The majority of project activities will occur in or near previously disturbed areas (terminal area, apron, runway, animal control fence, overhead power lines, pilot camp ground, previous clear-cut to clear the airport property in the 1960’s, and Jump Base).
  o With Alternatives W1 and S1 being able to be completed on airport property, the extent of tree clearing is less (approximately 15% as compared extension of utilities from Town) to facilitate installation of on-site infrastructure. Below is the estimated acreage of timber clearing that will take place within the confines of the airport property and animal control fence:
    ▪ Water tank / well to south of terminal – 1.0 acres (approximate 200’x200’ behind a timbered buffer from the airfield and terminal area).
    ▪ Water / sewer alignment extension to USFS Jump Base – 0.52 acres (widening of existing clearing along the inside of the animal control fence by approximately 20’). 
    ▪ Sewer Level 2 septic system with drain field – 4.13 acres (approximate 300’x600’ for drain field and infrastructure behind a timbered buffer from the airfield.
  ➢ Replacement of the existing airport beacon with a new beacon and tower.

Those bulleted items noted above are what constitutes the proposed action for immediate near-term development. Such infrastructure will support existing airport uses, as well as accommodate inherent growth of the aviation needs for the near term. Additional infrastructure (i.e. parking lots to the north and south side of the terminal) is presented in Figure 2 (cross hatched areas) for planning purposes only, and represents what is anticipated to be needed to accommodate the forecast growth at the airport over the latter portion of the 20-year planning period. The actual size of improvement footprint(s), final locations, and project specific aspects of the terminal, parking lot, access road, and other improvements will be determined in the design phase of the project, following completion of the environmental analysis. Improvements
are anticipated to be the same or very similar in size and layout as identified herein. Future actions not identified herein as a project element of the proposed action will be subject to National Environmental Policy Act (NEPA) and MEPA (Montana Environmental Policy Act) review and consulted on as appropriate in association with the development of those projects and in advance of any proposed project implementation.
PROPOSED ACTION: DETAILS OF WATER, SANITARY SEWER, AND FIBER OPTIC CONNECTIONS TO EXISTING INFRASTRUCTURE AT TOWN OF WEST YELLOWSTONE
PROPOSED ACTION: DETAILS OF WATER, SANITARY SEWER, and FIBER OPTIC CONNECTIONS TO EXISTING INFRASTRUCTURE AT TOWN OF WEST YELLOWSTONE

This appendix addresses the details under the Proposed Action of providing connections to existing infrastructure from the town of West Yellowstone.

C.1 Details of providing a connection to Town of West Yellowstone public water supply and local utility fiber optic infrastructure under the Proposed Action:

This item is described in Section 1.3 as part of the Proposed Action and shown on Figure C-1 to extend a potable water supply and fiber optic infrastructure from existing town infrastructure to the terminal area of the airport to serve the terminal and other airport support facilities (Aircraft Rescue Fire Fighting (ARFF) building, Snow Removal Equipment (SRE) building, Fixed Base Operator (FBO) and hangars). The water infrastructure would replace the existing solitary water well that serves the terminal, ARFF, SRE, and FBO. The water supply would serve as a potable water source for restrooms, concessions, maintenance, etc. and would also supply fire suppression support for fire hydrants, interior structural protection of the terminal, and ARFF operations.

Water improvements from the town are proposed to be looped to provide a continuous system versus a dead-end line to provide improved water and fire flow pressures and for redundancy in service. The layout for water improvements and fiber optic would also accommodate connection for the USFS Jump Base, if the USFS desires to connect in the future.

The fiber optic infrastructure would complement current telephone lines and serve needs for faster internet speeds for the terminal, ARFF, SRE, and FBO. Fiber optic is proposed to be collocated in the same trench as the water line from the town of West Yellowstone.

Under this item, a water main would be extended from town of West Yellowstone infrastructure on Iris Street and extended along the west and north sides of the Madison Addition (residential subdivision) across USFS property (under permit). The water main would then be looped north along an existing established travel corridor (unimproved jeep trail) that extends from town to the Airport access road. The fiber optic would extend from the east side of the Madison Addition and then parallel north along the proposed water main along the unimproved jeep trail. These lengths of the water and fiber optic infrastructure would cross USFS property. In order for private or public infrastructure to be permitted to occupy USFS property, authorization must be granted under a special use authorization (permit) for a specific use of the land for a specific period of time.

Once near the airport access road, the property changes to the ownership of the State of Montana and MDT – Aeronautics (Airport Sponsor). The water main and fiber optic infrastructure would parallel along the south side of the access road alignment and to the terminal building. The water main would then tie in to the existing water distribution system near the airport well to facilitate a supply of water to existing facilities (ARFF, SRE, FBO buildings).
Figure C-1: Water / Fiber Utility Exhibit – Connection to Town of West Yellowstone

Fire hydrants would also be considered for installation in the terminal area where there are none presently. The water main would be looped north inside the existing airport property line and along established corridors (animal control fence) to the south boundary with the USFS Jump Base. The line would proceed northeast onto USFS property (under permit) and along an overhead power lines corridor to the USFS Jump Base access road, then loop back to the airport access road and jeep trail. The line would be looped to tie in near Bechler Avenue off the northeast corner of the Madison Addition. A water main of the proposed length that supports fire flows generally requires such a system be looped to provide adequate water pressures and quantities for fire suppression, and to provide redundancy in the design to facilitate continual water supply from various directions in the event of maintenance or other shutdown.

To facilitate any desired extension to the USFS Jump Base, fiber could be extended along the USFS Jump Base road from Airport Road and along a section of the water main alignment as identified in Figure C-1. This infrastructure is not required to be looped to function, so the infrastructure could be terminated once it reaches desired USFS Jump Base facilities.

USFS land impact areas are identified in Figure C-1. Such infrastructure on these lands would require limited timber removal adjoining private property, as well as along existing travel routes to facilitate subsurface infrastructure (buried water mains and fiber optic) with limited infrastructure (i.e. fire hydrants, water valve boxes, pull boxes, and blow off piping) visible at ground level. Further review of timber clearing is provided in Section C.3.
All of these identified areas have been previously disturbed through clear cutting in the 1960’s (see Figure 1-2 in Chapter 1 of this document), or are along existing routes established for active jeep trails, access roads, or power line corridors.

Authorization for such improvements would be provided by the USFS Hebgen Lake Ranger District of the Custer Gallatin National Forest via a 30-year term permit. That permit would allow for consideration for renewal in the future.

Any water infrastructure would be designed and constructed in accordance with the design and construction standards of Montana Department of Environmental Quality (DEQ) Circular DEQ 1 Standards for Water Works. Such design may incorporate pump station(s), blow offs, fire hydrants, valves, and other pertinent items needed for a functional water distribution system.

The existing water distribution system from the well to the terminal, and then out to the ARFF, SRE, and FBO buildings is proposed to be largely retained in place and connected to the new water distribution system to provide potable water supply to the ARFF, SRE, and FBO buildings. Infrastructure that was not deemed necessary to facilitate connecting the terminal area structures would be proposed to be abandoned in place. The existing well would be abandoned by removing the casing below the ground surface, plugging the casing with bentonite, and capping by a licensed well driller in accordance with State regulations.

The extension of the town’s water system to Airport facilities via a looped water system would provide ancillary benefit to the town by providing a source of water along the west and north sides of the Madison Addition (residential subdivision) to aid in wildland fire suppression. The looped system would provide for improved pressures and redundancy in water supply in the event that any maintenance required a main shutdown along the alignment. The town’s water is supplied by Whiskey Springs and a number of wells within town limits. The water quality of Whiskey Springs is such that arsenic levels are below the threshold identified for drinking water standards. Implementation of this alternative would allow the Airport and USFS (if connection for the USFS Jump Base is desired in the future) to discontinue the use of bottled water and the use of arsenic removal systems for the existing onsite wells.

C.2 Details of providing a connection to Town of West Yellowstone public sanitary sewer system under the Proposed Action:

This item is included in the Proposed Action. It is described in Section 1.3 as part of the Proposed Action and would extend sanitary sewer service from the terminal to the Town treatment system, as reflected in Figure C-2. This item would entail continued use of the existing gravity flow system that begins just south of the existing terminal and extends to the existing lift station near the FBO (Figure 1-3). The existing septic tank at the beginning of that system would be proposed to be removed. The lift station would be upgraded for capacity and pump size to accommodate existing terminal, SRE, ARFF, FBO effluent and additional flows created by the new terminal as well as accommodating effluent flow from the USFS Jump Base if they desire to connect in the future. The lift station may be relocated further north to accommodate routing a pressurized effluent force main to the infield east of and paralleling the parallel taxiway then uphill to the south to the existing town lagoons or future mechanical treatment plant. Eligibility of FAA fundable infrastructure will be identified outside of this EA. Should elements not be eligible for FAA funding, they will need to be funded by the Sponsor or as otherwise coordinated. The force main would terminate in a charcoal filter bed to aid in removing odors before the effluent would enter the treatment facility.
Outside of directly serving the terminal needs, locating the lift station further north near the USFS Jump Base and airport property line would allow the USFS Jump Base to consider installing their own infrastructure to tie into the lift station to also pump their effluent via the dedicated force main. Other airport and future users may be able to tie into the gravity and force main sewer system, thereby taking additional existing septic and drain field systems off line. Tying in USFS infrastructure is anticipated to result in increased lift station cistern storage capacity, upsized lift station pump(s), and potentially upsizing of the force main line to the Town sewer lagoons treatment facility.

As part of the initial feasibility review of the connection to town infrastructure, initial existing and future sanitary sewer loading figures were provided to the town of West Yellowstone Engineer for review in their sewer facility model. While that document is currently being drafted, it was noted by the town that they are not able to accept further effluent until they transition from a lagoon type treatment system to a mechanical treatment system. The mechanical system is anticipated to be designed in 2020, the majority of construction and commissioning planned in 2021 and 2022, with the potential for rollover of minimal construction elements in the spring of 2023. In reviewing the timeline for construction of terminal improvements, as well as proposed funding availability, it is anticipated that the earliest usage of any sewer connection to Town facilities would be 2023. Until such time as the terminal sewer was connected to the town mechanical treatment plant and activated, it would be proposed to remain on the existing septic, lift station, and drain field treatment system. It should be noted that the transition of a lagoon type treatment system to a mechanical treatment system is being undertaken by the town regardless of extending sewer
services to the Airport. This proposed transition to a mechanical treatment system is included within the cumulative impacts analysis of this EA.

With the provision of new sanitary sewer infrastructure, the existing septic tanks can be removed, and force main to the existing drain field and drain field abandoned in place. The SRE building septic tank may need to remain as it collects effluent via the force main from the ARFF building. The FBO septic tank would be reviewed for possible removal to see if grades would facilitate adequate gravity drainage.

C.3 Details of timber clearing to facilitate offsite water and fiber optic improvements under the Proposed Action:

Timber clearing to facilitate subsurface utilities (i.e. water, sewer, and fiber optic) will be required to connect to Town of West Yellowstone infrastructure under the Proposed Action. The various timber clearing efforts are identified as follows, as well as identified in the utility exhibit below (Figure C-3):

- Timber clearing along the Madison Addition is anticipated to require the removal of up to a 30’ width of timber at the USFS / private property interface (on USFS property) along the west and north sides of the Madison Addition, as well as from the existing jeep trail to the intersection of Bechler Avenue.
- In areas where infrastructure can be installed and reasonably allow timber to remain within the 30’ clearing limits, then such timber will be allowed to remain. Such determinations will be dependent on water main and fiber location in regards to timber location, timber density, and timber presence along the edges of the 30’ clearing. Along all other areas, it is anticipated that up to an additional 10’ perpendicular from existing corridors (jeep trail, airport access road, overhead power line, and Jump Base access road) will require timber removal.
- Below is the estimated acreage of timber clearing that will take place outside of the animal control fence, broken out by clearing location:
  - Temporary (new) clearings bordering the Madison Addition (30’ width anticipated) – 4.13 acres
  - Jeep Trail (10’ width anticipated) – 1.18 acres
  - Airport Access Road (10’ width anticipated) – 0.63 acres
  - Overhead Power Line (10’ width anticipated) – 0.26 acres
  - Jump Base Access Road (10’ width anticipated) – 0.47 acres
- An estimated 3 acres of timber will be cleared within the existing animal control fence. The majority of project activities will occur in or near previously disturbed areas (terminal area, apron, runway, animal control fence, overhead power lines, pilot camp ground, previous clear-cut to clear the airport property in the 1960’s, and Jump Base).
- With Alternatives W1 and S1 being able to be completed on airport property, the extent of tree clearing is less (approximately 15% as compared to extension of utilities from town) to facilitate installation of on-site infrastructure. Below is the estimated acreage of timber clearing that will take place within the confines of the airport property and animal control fence:
  - Water tank / well to south of terminal – 1.0 acres (approximate 200’x200’ behind a timbered buffer from the airfield and terminal area).
  - Water / sewer alignment extension to USFS Jump Base – 0.52 acres (widening of existing clearing along the inside of the animal control fence by approximately 20’).
  - Sewer Level 2 septic system with drain field – 4.13 acres (approximate 300’x600’ for drain field and infrastructure behind a timbered buffer from the airfield).
Figure C-3: Timber Clearing Proposed for Water, Sewer, Fiber Optic Infrastructure

1. FIBER OPTIC TO BE EXTENDED ALONG PORTIONS OF THE PROPOSED WATER MAIN ALIGNMENT FROM TOWN OF WEST YELLOWSTONE TO THE TERMINAL AREA AND USFS JUMP BASE.
2. WATER MAIN ALTERNATIVE FROM TOWN IS LOCATED TO PROVIDE IMPROVED WATER AND FIRE FLOW PRESSURE AND FOR REDUNDANCY IN SERVICE.

Legend:
- SEWER MAIN / FORCE MAIN (PREFERRED ALTERNATIVE) - 12, 100 LF
- TYPE 2 SEPTIC SYSTEM (ALTERNATIVE 81)
- WATER MAIN (PREFERRED ALTERNATIVE) - 27, 515 LF
- ON-SITE WATER TANK / DISTRIBUTION SYSTEM (ALTERNATIVE W)
- SUBSEPTIC SYSTEM (ALTERNATIVE 81B)
- ANIMAL CONTROL FENCE

Area of Timber Clearance:
- Adjacent to Madison Addition - 4.13 Acres
- Adjacent to Existing JEEP Trail Addition - 1.16 Acres
- Adjacent to Airport Access Road (of Anticipated Width for ~ 0.55 Acres)
- Adjacent to Overhead Power Line (of Anticipated Width for ~ 0.25 Acres)
- Adjacent to Timber Clearing Adjacent to Jump Base Access Road (of Anticipated Width for ~ 0.47 Acres)
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**Emissions Inventory - Summary**

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**Emissions Inventory - Details**

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**Notes**

**Units of Measure for Greenhouse Gases Emission: Metric Ton**

**Units of Measure for Non-Greenhouse Gases Emission: Short Ton**

**Study Description**

Airport Construction Emissions Inventory Tool (ACEIT) Version 1.0

Run Date & Time: 1/8/2020 10:33:31 AM
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Markings
Markings
Sidewalks
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Soil Erosion/Sediment Control
Soil Erosion/Sediment Control
Soil Erosion/Sediment Control
Soil Erosion/Sediment Control
Subbase Placement
Subbase Placement
Subbase Placement
Subbase Placement
Topsoil Placement
Topsoil Placement
Topsoil Placement
Utility
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Concrete Foundations
Concrete Foundations
Concrete Foundations
Concrete Foundations
Concrete Foundations
Construction Mob & Layout
Construction Mob & Layout
Exterior Wall Framing
Exterior Wall Framing
Exterior Wall Framing
Exterior Wall Framing
Exterior Wall Framing
Interior Build-Out/ Finishes
Interior Build-Out/ Finishes
Interior Build-Out/ Finishes
Interior Build-Out/ Finishes
Roofing
Roofing
Roofing
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Security & Safety Systems
Security & Safety Systems
Structural Steel Frame
Structural Steel Frame
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Structural Steel Frame
Asphalt Demolition
Asphalt Demolition
Asphalt Demolition
Asphalt Placement
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Asphalt Placement
Clearing and Grubbing
Clearing and Grubbing
Clearing and Grubbing
Curbing
Curbing
Curbing
Curbing
Excavation (Borrow)
Excavation (Borrow)
Excavation (Borrow)
Excavation (Borrow)
Excavation (Cut to Fill)
Excavation (Cut to Fill)
Excavation (Cut to Fill)
Excavation (Cut to Fill)
Excavation (Cut to Fill)
Excavation (Cut to Fill)
Excavation (Topsoil Stripping)
Grading
Grading
Grading
Hydroseeding

Other General
Diesel
Equipment
175
Pickup TruckDiesel
600
Concrete Truck
Diesel
600
Dump TruckDiesel
600
Pickup TruckDiesel
600
Tractors/Loader/Backhoe
Diesel
100
Vibratory Compactor
Diesel
6
Other General
Diesel
Equipment
175
Pickup TruckDiesel
600
Pumps
Diesel
11
Tractors/Loader/Backhoe
Diesel
100
Dozer
Diesel
175
Dump TruckDiesel
(12 cy)
600
Pickup TruckDiesel
600
Roller
Diesel
100
Dozer
Diesel
175
Dump TruckDiesel
600
Pickup TruckDiesel
600
Air Compressor
Diesel
100
Dump TruckDiesel
600
Loader
Diesel
175
Other General
Diesel
Equipment
175
Pickup TruckDiesel
600
Skid Steer Loader
Diesel
75
Tractors/Loader/Backhoe
Diesel
100
Trenchers Diesel
75
Backhoe Diesel
100
Concrete Ready
DieselMix Trucks 600
Fork Truck Diesel
100
Tool Truck Diesel
600
Tractor TrailerDiesel
Material Delivery
600
Survey CrewDiesel
Trucks
600
Tractor Trailers
Diesel
Temp Fac. 600
Fork Truck Diesel
100
Generator Diesel
40
Man Lift Diesel
75
Tool Truck Diesel
600
Tractor TrailerDiesel
Material Delivery
600
Fork Truck Diesel
100
Man Lift Diesel
75
Tool Truck Diesel
600
Tractor TrailerDiesel
Material Delivery
600
High Lift Diesel
100
Man Lift (Fascia
Diesel
Construction) 75
Material Deliveries
Diesel
600
Tractor TrailerDiesel
Material Delivery
600
High Lift Diesel
100
Tool Truck Diesel
600
90 Ton Crane
Diesel
300
Concrete Pump
Diesel
11
Concrete Truck
Diesel
600
Fork Truck Diesel
100
Tool Truck Diesel
600
Tractor TrailerDiesel
Steel Deliveries600
Trowel Machine
Diesel
600
Dozer
Diesel
175
Excavator Diesel
175
Pickup TruckDiesel
600
Asphalt Paver
Diesel
175
Dump TruckDiesel
600
Other General
Diesel
Equipment
175
Pickup TruckDiesel
600
Roller
Diesel
100
Skid Steer Loader
Diesel
75
Surfacing Equipment
Diesel (Grooving)25
Chain Saw Diesel
11
Chipper/Stump
Diesel
Grinder
100
Pickup TruckDiesel
600
Concrete Truck
Diesel
600
Curb/GutterDiesel
Paver
175
Other General
Diesel
Equipment
175
Pickup TruckDiesel
600
Dozer
Diesel
175
Dump TruckDiesel
(12 cy)
600
Pickup TruckDiesel
600
Roller
Diesel
100
Dozer
Diesel
175
Dump TruckDiesel
(12 cy)
600
Excavator Diesel
175
Pickup TruckDiesel
600
Roller
Diesel
100
Scraper
Diesel
600
Dozer
Diesel
175
Dozer
Diesel
175
Grader
Diesel
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Roller
Diesel
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Hydroseeder
Diesel
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2.28E-05
2.32E-07
1.02E-06
6.39E-06
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4.03E-06
9.02E-06
3.03E-05
3.03E-05
3.20E-05
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6.72E-05
4.97E-05
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1.97E-05
3.40E-05
2.90E-05
6.12E-05
6.00E-05
8.17E-05
1.62E-05
1.01E-05
3.98E-06
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4.26E-05
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6.12E-05
6.12E-05
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1.22E-05
4.07E-05
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5.495179
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11.99903
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11.39326
28.12214
37.99653
21.90964
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4.557305
2.815377
2.278652
7.576519
2.278174
3.322933
3.322988
22.78652
1.978653
24.43437
2.852834
6.784307
1.255658
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0.401173
0.392994 *** GASOLINE DATA USED. DIESEL DATA NOT AVAILABLE ***
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2.483062
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Parking Lot
Demolition - Building
Demolition - Building
Demolition - Building
Demolition - Building
Demolition - Building

Hydroseeding
Markings
Markings
Markings
Sidewalks
Sidewalks
Sidewalks
Sidewalks
Sidewalks
Soil Erosion/Sediment Control
Soil Erosion/Sediment Control
Soil Erosion/Sediment Control
Soil Erosion/Sediment Control
Street Utility
Street Utility
Street Utility
Street Utility
Street Utility
Street Utility
Subbase Placement
Subbase Placement
Subbase Placement
Subbase Placement
Topsoil Placement
Topsoil Placement
Topsoil Placement
Building Demolition
Building Demolition
Building Demolition
Building Demolition
Building Demolition

Off-Road Truck
Diesel
Flatbed Truck
Diesel
Other General
Diesel
Equipment
Pickup TruckDiesel
Concrete Truck
Diesel
Dump TruckDiesel
Pickup TruckDiesel
Tractors/Loader/Backhoe
Diesel
Vibratory Compactor
Diesel
Other General
Diesel
Equipment
Pickup TruckDiesel
Pumps
Diesel
Tractors/Loader/Backhoe
Diesel
Dump TruckDiesel
Loader
Diesel
Other General
Diesel
Equipment
Pickup TruckDiesel
Skid Steer Loader
Diesel
Tractors/Loader/Backhoe
Diesel
Dozer
Diesel
Dump TruckDiesel
(12 cy)
Pickup TruckDiesel
Roller
Diesel
Dozer
Diesel
Dump TruckDiesel
Pickup TruckDiesel
Bob Cat Diesel
Dump TruckDiesel
Excavator with
Diesel
Bucket
Generator Sets
Diesel
Pickup TruckDiesel

600
600
175
600
600
600
600
100
6
175
600
11
100
600
175
175
600
75
100
175
600
600
100
175
600
600
75
600
175
40
600

Equipment
Asphalt 18 Wheeler
Cement Mixer
Dump Truck - Asphalt
Dump Truck Subbase Material
Passenger Car
Dump Truck Subbase Material
Passenger Car
Cement Mixer
Dump Truck Subbase Material
Passenger Car
Tractor Trailer
Dump Truck
Passenger Car
Asphalt 18 Wheeler
Cement Mixer
Dump Truck - Asphalt
Dump Truck Subbase Material
Passenger Car
Dump Truck
Passenger Car

Equipment Category
On-road Activity
Fuel
Combination
Material
Short-haul
Delivery
Diesel
Truck
Single Unit Short-haul
Material Delivery
Truck
Diesel
Single Unit Short-haul
Material Delivery
Truck
Diesel
Single Unit Short-haul
Material Delivery
Truck
Diesel
Passenger Car
Employee Commute
Gasoline
Single Unit Short-haul
Material Delivery
Truck
Diesel
Passenger Car
Employee Commute
Gasoline
Single Unit Short-haul
Material Delivery
Truck
Diesel
Single Unit Short-haul
Material Delivery
Truck
Diesel
Passenger Car
Employee Commute
Gasoline
Combination
Material
Short-haul
Delivery
Diesel
Truck
Single Unit Short-haul
Material Delivery
Truck
Diesel
Passenger Car
Employee Commute
Gasoline
Combination
Material
Short-haul
Delivery
Diesel
Truck
Single Unit Short-haul
Material Delivery
Truck
Diesel
Single Unit Short-haul
Material Delivery
Truck
Diesel
Single Unit Short-haul
Material Delivery
Truck
Diesel
Passenger Car
Employee Commute
Gasoline
Single Unit Short-haul
Material Delivery
Truck
Diesel
Passenger Car
Employee Commute
Gasoline

0.59
0.59
0.43
0.59
0.59
0.59
0.59
0.21
0.43
0.43
0.59
0.43
0.21
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0.59
0.43
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0.21
0.21
0.59
0.59
0.59
0.59
0.59
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0.59
0.21
0.59
0.59
0.43
0.59

26.775
4.64
4.64
4.64
20
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20
20
24.8
49.6
24.8
24.8
17.067
17.067
17.067
17.067
17.067
17.067
60.174
423.444
60.174
58.631
66.045
66.045
66.045
240
240
120
120
140

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0.000107
0.000313
0.001351
0.001351
0.001351
0.001566
0.000253
0.000571
0.00335
0.000576
0.001942
0.001153
0.000624
0.000393
0.001153
0.001098
0.001337
0.001707
0.028598
0.004064
0.003355
0.001874
0.00446
0.00446
0.015441
0.016209
0.002793
0.002147
0.009455

0.004512 2.73E-05 0.000171 0.000158 0.001481 5.084243
0.000782 4.73E-06 2.97E-05 2.73E-05 0.00027 0.881079
0.000387 1.06E-06 2.41E-05 2.22E-05 8.47E-05 0.185249
0.000782 4.73E-06 2.97E-05 2.73E-05 0.00027 0.881079
0.003371 2.04E-05 0.000128 0.000118 0.00111 3.797754
0.003371 2.04E-05 0.000128 0.000118 0.00111 3.797754
0.003371 2.04E-05 0.000128 0.000118 0.00111 3.797754
0.001168 1.81E-06 0.000207 0.00019 0.00032 0.291673
0.000249 2.26E-07 2.10E-05 1.94E-05 3.46E-05 0.030369
0.002066 5.69E-06 0.000129 0.000119 0.000353 0.990124
0.008359 5.06E-05 0.000318 0.000292 0.002729 9.418429
0.000579 5.13E-07 5.01E-05 4.61E-05 8.11E-05 0.069033
0.001448 2.25E-06 0.000256 0.000236 0.000376 0.361674
0.002876 1.74E-05 0.000109 0.000101 0.00095 3.240813
0.001463 5.29E-06 0.000119 0.00011 0.000315 0.945171
0.001422 3.92E-06 8.86E-05 8.15E-05 0.00025 0.681389
0.002876 1.74E-05 0.000109 0.000101 0.00095 3.240813
0.001295 1.21E-06 0.000156 0.000143 0.000264 0.186518
0.000996 1.55E-06 0.000176 0.000162 0.000285 0.248899
0.003806 1.83E-05 0.000285 0.000262 0.001009 3.33257
0.071363 0.000432 0.002712 0.002495 0.023174 80.4068
0.010141 6.13E-05 0.000385 0.000355 0.003307 11.4263
0.003296 1.15E-05 0.000336 0.000309 0.000618 2.060583
0.004177 2.01E-05 0.000312 0.000287 0.001107 3.657719
0.011131 6.73E-05 0.000423 0.000389 0.003628 12.54113
0.011131 6.73E-05 0.000423 0.000389 0.003628 12.54113
0.018213 1.70E-05 0.002191 0.002016 0.002954 2.622864
0.040447 0.000245 0.001537 0.001414 0.013136 45.57305
0.006321 3.60E-05 0.000392 0.00036 0.001954 6.645976
0.008689 7.53E-06 0.000406 0.000373 0.000612 1.216853
0.023594 0.000143 0.000896 0.000825 0.007668 26.58428

On-Road Sources
Units for Non-Greenhouse Gases Emission: Short Ton
Units for Greenhouse Gases (CO2, CH4, and N2O) Emission: Metric Ton
Scenario IDYear
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
2
2

2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022

Project
Access Road
Access Road
Access Road
Access Road
Access Road
Utility Main
Utility Main
Building - 30000 sqft- 3 stories
Building - 30000 sqft- 3 stories
Building - 30000 sqft- 3 stories
Building - 30000 sqft- 3 stories
Demolition - Asphalt
Demolition - Asphalt
Parking Lot
Parking Lot
Parking Lot
Parking Lot
Parking Lot
Demolition - Building
Demolition - Building

Roadway Type
Round Trip Distance (miles)
forNumber
fugitive of
PMVehicles
Number of Employees
Number of Or
Project
$M*11
Days
Length
(Whichever
Project Width
larger)
Project AreaBuilding Height
Open
(Building
SpaceNumber
Height
Demolition
(Building
of Trees
Activity
Only)
Demolition
RateVMT Only) CO
Urban Unrestricted40
Access
5
1 -129
3000
30 -----1306 0.003939
Urban Unrestricted40
Access
5
3 -129
3000
30 -----20813 0.022115
Urban Unrestricted40
Access
5
1 -129
3000
30 -----1850 0.00372
Urban Unrestricted40
Access
5
2 -129
3000
30 -----11100 0.012751
Urban Unrestricted30
Access
-58
58
129 -------224460 0.757535
Urban Unrestricted40
Access
5
2 -129
16250
10 -----20042 0.01917
Urban Unrestricted30
Access
-8
8
129 -------30960 0.104488
Urban Unrestricted40
Access
5
1 -129 --30000 ----6938 0.007372
Urban Unrestricted40
Access
5
1 -129 --30000 ----3700 0.005048
Urban Unrestricted30
Access
-165
165
129 -------638550 2.155055
Urban Unrestricted40
Access
5
1 -129 --30000 ---0.00053
159 0.002704
Urban Unrestricted40
Access
5
2 -129
1500
40 -----13333 0.014354
Urban Unrestricted30
Access
-3
3
129 -------11610 0.039183
Urban Unrestricted40
Access
5
1 -129
500
515 -----3736 0.006554
Urban Unrestricted40
Access
5
6 -129
500
515 -----59547 0.057095
Urban Unrestricted40
Access
5
1 -129
500
515 -----5293 0.006191
Urban Unrestricted40
Access
5
4 -129
500
515 -----31758 0.032364
Urban Unrestricted30
Access
-55
55
129 -------212850 0.718352
Urban Unrestricted40
Access
5
1 -129 --10000
25
20 --9259 0.009526
Urban Unrestricted30
Access
-2.2
2.2
129 -------8514 0.101023

Fugitive Sources
Units for Non-Greenhouse Gases Emission: Short Ton
Scenario IDYear
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1
1

2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022
2022

Project
Access Road
Access Road
Access Road
Access Road
Access Road
Access Road
Access Road
Utility Main
Building - 30000 sqft- 3 stories
Building - 30000 sqft- 3 stories
Building - 30000 sqft- 3 stories
Demolition - Asphalt
Demolition - Asphalt
Demolition - Asphalt
Demolition - Asphalt
Parking Lot
Parking Lot
Parking Lot
Parking Lot
Parking Lot
Parking Lot

Fugitive Source Type
Number of Months
CO
NOx
SO2
PM10
VOC
Asphalt Drying
6
0
0
0
0 3.33875
Asphalt Storage and Batching
6 0.21775
0.0136 0.002502
0.0149 0.00675
Concrete Mixing/Batching
6
0
0
0
0.077
0
Material Movement (Paved Roads)
6
0
0
0 0.02095
0
Material Movement (Unpaved Roads)
6
0
0
0
0.065
0
Soil Handling
6
0
0
0 0.02545
0
Unstabilized Land and Wind Erosion
6
0
0
0 1.82E-08
0
Material Movement (Paved Roads)
6
0
0
0
0.006
0
Concrete Mixing/Batching
6
0
0
0 0.02565
0
Material Movement (Paved Roads)
6
0
0
0
0.006
0
Material Movement (Unpaved Roads)
6
0
0
0 0.01765
0
Material Movement (Paved Roads)
6
0
0
0
0.006
0
Material Movement (Unpaved Roads)
6
0
0
0
0.0187
0
Soil Handling
6
0
0
0
0.017
0
Unstabilized Land and Wind Erosion
6
0
0
0 1.21E-08
0
Asphalt Drying
6
0
0
0
0 9.55255
Asphalt Storage and Batching
6 0.62305
0.0389 0.00715 0.04265
0.0193
Material Movement (Paved Roads)
6
0
0
0
0.0359
0
Material Movement (Unpaved Roads)
6
0
0
0 0.11485
0
Soil Handling
6
0
0
0
0.0729
0
Unstabilized Land and Wind Erosion
6
0
0
0 5.20E-08
0

NOx
0.005151
0.038528
0.003465
0.02057
0.049194
0.037052
0.006785
0.012843
0.006875
0.139948
0.000728
0.024686
0.002545
0.014522
0.110088
0.009811
0.058757
0.046649
0.019301
0.002016

SO2
2.50E-05
0.000215
1.92E-05
0.000115
0.001585
0.000207
0.000219
7.16E-05
3.83E-05
0.004509
3.27E-06
0.000138
8.20E-05
7.12E-05
0.000614
5.47E-05
0.000328
0.001503
8.88E-05
6.22E-05

PM10
0.000225
0.001229
0.000111
0.000656
0.001377
0.001182
0.00019
0.00041
0.000219
0.003918
3.05E-05
0.000787
7.12E-05
0.000638
0.003512
0.000313
0.001874
0.001306
0.000546
0.00021

PM2.5
0.000218
0.001192
0.000107
0.000637
0.001268
0.001146
0.000175
0.000397
0.000213
0.003608
2.95E-05
0.000764
6.56E-05
0.000619
0.003406
0.000304
0.001818
0.001203
0.000529
0.000193

VOC
0.001652
0.000539
0.00016
0.000349
0.045641
0.000383
0.006295
0.00018
0.000167
0.12984
0.001648
0.000357
0.002361
0.001661
0.001147
0.000173
0.000734
0.04328
0.000388
0.002349


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<th>Scenario ID</th>
<th>Project Year</th>
<th>Number of Months</th>
<th>Season</th>
<th>Average Day Max Daily</th>
<th>Min/Max Daily Temp Change (degF)</th>
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<td>2022</td>
<td>6</td>
<td>Summer</td>
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<td>Max 10 &lt;= Change in T &lt; 20</td>
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<td>2023</td>
<td>6</td>
<td>Winter</td>
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<td>Min -20 &lt;= Change in T &lt; 20</td>
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### Project Final Selections

<table>
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<tr>
<th>Scenario ID</th>
<th>Project</th>
<th>Construction Activity</th>
<th>Equipment</th>
<th>Fuel Type</th>
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<tr>
<td>1</td>
<td>Access Road Asphalt Placement</td>
<td>Asphalt Rover</td>
<td>Diesel</td>
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<tr>
<td>1</td>
<td>Access Road Asphalt Placement</td>
<td>Dump Truck</td>
<td>Diesel</td>
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<tr>
<td>1</td>
<td>Access Road Asphalt Placement</td>
<td>Other General Equipment</td>
<td>Diesel</td>
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<tr>
<td>1</td>
<td>Access Road Asphalt Placement</td>
<td>Pickup Truck</td>
<td>Diesel</td>
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<tr>
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<td>Access Road Asphalt Placement</td>
<td>Roller</td>
<td>Diesel</td>
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<td>Access Road Asphalt Placement</td>
<td>Skid Steer Loader</td>
<td>Diesel</td>
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<td>Access Road Asphalt Placement</td>
<td>Surfacing Equipment (Grouting)</td>
<td>Diesel</td>
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<td>Access Road Asphalt Placement</td>
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<tr>
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<td>Access Road Asphalt Placement</td>
<td>Chopper/Stump Grinder</td>
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<td>Concrete Saw</td>
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<td>Grub/Gudder Rover</td>
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<td>Access Road Dust Control</td>
<td>Water Tank</td>
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<td>Douser</td>
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<tr>
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<td>Dumper Truck (12-cy)</td>
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<td>Roller</td>
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<tr>
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<td>Access Road Excavation (Cut to Fill)</td>
<td>Douser</td>
<td>Diesel</td>
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<td>Dumper Truck (12-cy)</td>
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<td>Pickup Truck</td>
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<td>Roller</td>
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<tr>
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<tr>
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<td>Lastrac Truck</td>
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<td>Pickup Truck</td>
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<tr>
<td>1</td>
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### Activity: Non-Road [Estimated based on engineering experience]

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### Activity: Site [Estimated based on engineering experience]

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***GASOLINE DATA USED. DIESEL DATA NOT AVAILABLE***
| Scenario | Project | Equipment | On-road Activity | Fuel | Roadway | Trip Number | Number of Project Lor Project | Project Building in Open Space | Number of Activity | Activity Rate | Default VMT | User VMT | CO (g/hp-hr) | CO2 (g/hp-hr) | SO2 (g/hp-hr) | PM10 (g/hp-hr) | PM2.5 (g/hp-hr) | VOC Exhaust (g/hp-hr) |
|----------|---------|-----------|-----------------|------|---------|-------------|-------------------------------|-----------------------------|----------------------|---------------|------------|-----------|----------|-------------|-------------|-------------|-------------|-------------|------------------|
| 1        | Access | Asphalt | 18 Wheeler       | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Access | Cement | Mixer            | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Access | Diesel | Dump Truck 18 Wheeler | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Access | Passenger Car | Employee Commute | Gasoline | Urban    | 30 – 58 | 129 | 125 | -- | -- | -- | -- | 224340 | 240 | 120 | 240 | 120 | 120 | 120 | 240 | 120 |
|          | Utility | Main | Truck Subbase Material | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Building | 3 | Cement Mixer | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Building | 3 | Asphalt 18 Wheeler | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Building | 3 | Tractor Trailer | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 224340 | 240 | 120 | 240 | 120 | 120 | 120 | 240 | 120 |
|          | Building | 3 | Tractor | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Building | 3 | Cement Mixer | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Building | 3 | Diesel Dump Truck 18 Wheeler | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
| 2         | Demolition | Building | Demolition | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Demolition | Building | Demolition | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Demolition | Building | Demolition | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |
|          | Demolition | Building | Demolition | Diesel | Urban    | 40 – 129 | 1000 | 30 – | -- | -- | -- | -- | 423.44 | 24.8 | 119.09 | 66.05 | 60.17 | 60.17 | 17.07 | 26.78 | 29.72 |

Emission Factor: Non-Road (from NONROAD)

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<th>Equipment</th>
<th>Fuel Type</th>
<th>Avg Rated</th>
<th>Load Factor</th>
<th>CO (g/hp-hr)</th>
<th>CO2 (g/hp-hr)</th>
<th>SO2 (g/hp-hr)</th>
<th>PM10 (g/hp-hr)</th>
<th>PM2.5 (g/hp-hr)</th>
<th>VOC Exhaust (g/hp-hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Access</td>
<td>Asphalt</td>
<td>Paver</td>
<td>Diesel</td>
<td>175</td>
<td>0.5</td>
<td>0.318849</td>
<td>0.67545</td>
<td>0.1387</td>
<td>0.02297</td>
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<td>0.00916</td>
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</tbody>
</table>

Activity: On Road (Estimated based on engineering experience)
Fugitive Emissions (Emission Factors from Various Sources including AP-42)

<table>
<thead>
<tr>
<th>Variable</th>
<th>Default Unit</th>
<th>User Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>A = Area of land affected × L × W</td>
<td>m²</td>
<td>3861 m²</td>
</tr>
<tr>
<td>AR = Application rate of liquefied asphalt</td>
<td></td>
<td>1.811 L/m²</td>
</tr>
<tr>
<td>VO = Volume fraction of diluent in asphalt</td>
<td></td>
<td>0.35 Fraction</td>
</tr>
<tr>
<td>D = Density of solvent utilized</td>
<td></td>
<td>1.8 l/g</td>
</tr>
<tr>
<td>T = Mass of asphalt loaded × L × W × 0.1667 / 2000</td>
<td></td>
<td>667.7 lbs</td>
</tr>
<tr>
<td>PMOD = (0.027 + 0.00042v) × T</td>
<td></td>
<td>24.8 lbs</td>
</tr>
<tr>
<td>CO = (0.9 + 0.0004v) × T</td>
<td></td>
<td>605.5 lbs</td>
</tr>
<tr>
<td>NOx = (0.0275 + 0.00042v) × T</td>
<td></td>
<td>27.2 lbs</td>
</tr>
<tr>
<td>SOx = (0.0046 + 0.00042v) × T</td>
<td></td>
<td>50.6 lbs</td>
</tr>
<tr>
<td>VOC = (0.027 + 0.00042v) × T</td>
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<tr>
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<td></td>
<td>15.5 lbs</td>
</tr>
</tbody>
</table>
1. Parking Lot Material Movement (Paved Roads)  
   \[ PM10 = 0.0022 \times (sL^{0.91}) \times (Wt^{1.02}) \times VMT \]  
   - \[ 7\text{.8 lbs} \]  
2. Parking Lot Soil Handling  
   \[ PM10 = 0.0022 \times (sL^{0.91}) \times (Wt^{1.02}) \times VMT \]  
   - \[ 5\text{ mph} \]  
3. Parking Lot Soil Handling  
   \[ u = \text{Wind speed} \]  
   - \[ 71.8 \text{ lbs} \]  
4. Parking Lot Soil Handling  
   \[ m = \text{Moisture content} \]  
   - \[ 0.25 \text{ Frac} \]  
5. Parking Lot Soil Handling  
   \[ T = \text{Mass of aggregate storage pile} \]  
   - \[ 7081.3 \text{ tons} \]  
6. Parking Lot Soil Handling  
   \[ PM10 = 0.0022 \times (sL^{0.91}) \times (Wt^{1.02}) \times VMT \]  
   - \[ 77.8 \text{ lbs} \]  
7. Parking Lot Soil Handling  
   \[ T = \text{Year} \]  
   - \[ 0.5 \text{ Frac} \]  
8. Parking Lot Soil Handling  
   \[ CE = \text{Control efficiency} \]  
   - \[ 0.63 \text{ Frac} \]  
9. Parking Lot Soil Handling  
   \[ t = \text{year} \]  
   - \[ 0.5 \text{ years} \]  
10. Parking Lot Soil Handling  
   \[ T = \text{Year} \]  
   - \[ 0.5 \text{ years} \]  

ASSUMPTIONS

Emission factors were developed from the following models:

- **On-Road Vehicles**: MOVES 2010b, revised January 2013  
- **Non-Road Equipment**: NONROAD2008a, July 2008

In addition to the overall project size dimensions (e.g., length and width) provided by the user, an additional 10 ft length and 10 ft width is added to account for disturbance areas.

The number of employees is based on the higher of two methods: (1) number of equipment, and (2) multiply the project cost in million by 11.

The average employee travels 30 miles round-trip from home to construction site each day.

The average on-road material delivery round-trip distance per truck is 40 miles per day.

For calculating fugitive, re-entrained PM emissions from on-road and non-road material delivery and handling equipment, a nominal VMT of 5 miles is used for each vehicle per day.

In deriving emission factors from NONROAD, the horsepower for each equipment represents the most popular in each equipment category.

The total length of each modeled scenario is used to define the number of days associated with vehicle/equipment evaporative emissions.

The choice of location and season are assumed to adequately represent differences in fuel characteristics affecting emissions.

Only two seasons (Summer and Winter) are used to represent all seasons.

34 U.S. Counties are used to represent all other counties in the U.S. (all other counties are mapped to the 14).

The default methods assume that all construction equipment use diesel as well as heavy duty on-road vehicles, while passenger vehicles (including motorcycles) use gasoline.

Fugitive emissions are only modeled for:

- Asphalt drying
- Asphalt storage and batching
- Concrete mixing/batching
- Soil handling
- Unstabilized land and wind erosion
- Material movement (paved roads)
- Material movement (unpaved roads)

On road vehicle speeds are not explicitly modeled. The associated emission factors for each modeled vehicle from MOVES represent averages over the driving cycles, the roadway type, and daily temperature variations.

The default equipment hours-of-use data are developed based on the overall size of the project provided by the user and activity rates based on expert engineering judgment.

Under the Construction Activity Type list (Activity Tab), when a choice between asphalt and concrete materials occurs, asphalt is always selected as default. To choose concrete, de-select the asphalt item and select the corresponding concrete item.

Two trips per day were assumed for each on-road material handling trucks.

Only CO2, CH4, and N2O are used to represent greenhouse gas emissions. Other potential greenhouse gases including air conditioning refrigerants were not included.

The following equipment are always modeled using diesel emission factors since gasoline-based emission factors are not available:

- Asphalt Delivers/Ten Wheelers
- Bulldozer
- Concrete Ready Mix Trucks
- Concrete Ready Trucks Mix for Cores
- Concrete Truck
- Crush Fill (Trailer Mounted)
- Delivery of Tanks (2)
- Distributing Tanker
- Dozer
- Dump Truck
- Dump Trucks (33 cy)
- Excavator
- Excavator for U/G Services/Tanks
- Flat Bed or Dump Trucks
- Fired Truck
- Grader
- Grout Wheel Truck
- Hoist Equipment with 40 Ton Rig
- Hydraform Hammer
- Hydromower
- Live Painting Truck and Sprayer
- Material Deliveries
- Off-Road Truck
- Pickup Truck
Scrapes
Seed Truck Spreader
Small Dozer
Survey Crew Trucks
Ten Wheelers
Ten Wheelers - Material Delivery
Test Truck
Tractor Traler - Equipment Delivery
Tractor Traler - Material Delivery
Tractor Trailer - Seed Delivery
Tractor Trailer - Stone Delivery
Tractor Trailer - Topsoil & Seed
Tractor Trailer - Truck Delivery
Tractor Trailer with Boom Hoist - Curbs Del & Place
Tractor Trailer with Boom Hoist - Delivery
Tractor Trailers - Rebar Deliveries
Tractor Trailers - Steel Delivered
Truck for Topsoil & Seed Del & Spread
Water Truck
Excavator with Bucket
Excavator with Hoe-Ram

*******************************************************************************
MONTANA NATURAL HERITAGE PROGRAM DATA
October 2, 2019

Christine Pearcy
Morrison Maierle Inc
2880 Technology Blvd W
Bozeman, MT

Dear Christine Pearcy,

Thank you for your request for Natural Heritage information for the area surrounding the Yellowstone Airport, West Yellowstone, Montana (in Gallatin County). Included with this letter is an Environmental Summary report PDF and a companion Excel workbook summarizing information managed in the Montana Natural Heritage Program's (MTNHP) databases for: (1) species occurrences; (2) other observed species without Species Occurrences; (3) other species potentially present based on their range, presence of associated habitats, or predictive distribution model output if available; (4) structured surveys (organized efforts following a protocol capable of detecting one or more species); (5) land cover mapped as ecological systems; (6) wetland and riparian mapping; (7) land management categories; and (8) biological reports associated with plant and animal observations. The PDF report contains introductory materials and limitations associated with the use of each of these data types, a list of additional information resources, data use terms and conditions, and suggested contacts. The Excel workbook contains worksheets for each data type that can be easily sorted to summarize particular information needs. In addition to these materials, we have included a compilation of one page snapshots containing general description, habitat, spatial and temporal distribution, and conservation status information for each species listed in the species occurrence, other observed species, and other potential species sections of the Environmental Summary report. These three field guide compilations are excerpted from the full accounts found on the Montana Field Guide http://fieldguide.mt.gov for general reference use and, if desired, as appendices to environmental review documents.

Please keep in mind the following when using and interpreting the enclosed information:

(1) This information is intended for distribution or use only within your department, agency, or business. Please see the Data Use Terms and Conditions in the Environmental Summary report PDF for additional guidelines.

(2) Our minimum search area for standard information requests consists of the requested area buffered by an additional mile in order to capture records that may be immediately adjacent to the requested area. Please let us know if a buffer greater than 1 mile would be of use to your efforts.

Visit the Montana Natural Heritage Program at http://mtnhp.org
(3) Additional information on animal, plant, and lichen species and ecological systems in Montana is available on the Montana Field Guide at http://fieldguide.mt.gov/

(4) In addition to the information you receive from us, we encourage you to contact state, federal, and tribal resource management agencies in the area where your project is located (see Environmental Summary report PDF).

In order to help us improve our services to you, we invite you to take a simple survey. The survey is intended to gather some basic information on the value and quality of the information and services you recently received from the Montana Natural Heritage Program. The survey is short and should not take more than a few minutes to complete. All information will be kept confidential and will be used internally to improve the delivery of services and to help document the value of our services. Use this link to go to the survey: http://www.surveymonkey.com/s/RYN8Y8L.

I hope the enclosed information is helpful to you. Please feel free to contact me at the phone or email address below if you have any questions, require additional information, or have suggestions for how we could improve our information resources.

Sincerely,

Bryce A. Maxell
Montana Natural Heritage Program
(406) 444-3989
bmaxell@mt.gov
The Montana Natural Heritage Program is a program of the Montana State Library's Natural Resource Information System. It is operated as a special program under the Office of the Vice President for Research and Creative Scholarship at the University of Montana, Missoula. The Montana Natural Heritage Program is part of NatureServe – a network of over 80 similar programs in states, provinces and nations throughout the Western Hemisphere, working to provide comprehensive status and distribution information for species and ecosystems.

Suggested Citation
Introduction to Environmental Summary Report

The Environmental Summary report for your area of interest consists of introductory and related materials in this PDF and an Excel workbook with worksheets summarizing information managed in the Montana Natural Heritage Program’s (MTNHP) databases for: (1) species occurrences; (2) other observed species without Species Occurrences; (3) other species potentially present based on their range, presence of associated habitats, or predictive distribution model output if available; (4) structured surveys (organized efforts following a protocol capable of detecting one or more species); (5) land cover mapped as ecological systems; (6) wetland and riparian mapping; (7) land management categories; and (8) biological reports associated with plant and animal observations. In order to do this in a consistent manner across Montana and allow for rapid delivery of summaries, we have intersected this information with a uniform grid of hexagons that have been used for planning efforts across the western United States (e.g. Western Association of Fish and Wildlife Agencies - Crucial Habitat Assessment Tool). Each hexagon is one square mile in area and approximately one kilometer in length on each side. Summary information for each data layer is then stored with each hexagon and those summaries are added up to an overall summary for the report area you have requested. Users should be aware that summaries do not correspond to the exact boundaries of the polygon they have specified, but instead are a summary across all hexagons intersected by the polygon they specified.

In presenting this information, MTNHP is working towards assisting the user with rapidly assessing the known or potential species and biological communities, land management categories, and biological reports associated with the report area. We remind users that this information is likely incomplete and may be inaccurate as surveys to document species are lacking in many areas of the state, species’ range polygons often include regions of unsuitable habitat, methods of predicting the presence of species or communities are constantly improving, and information is constantly being added and updated in our databases. Field verification by professional biologists of the absence or presence of species and biological communities in a report area will always be an important obligation of users of our data. Users are encouraged to only use this environmental summary report as a starting point for more in depth analyses and are encouraged to contact state, federal, and tribal resource management agencies for additional data or management guidelines relevant to your efforts. Please see the Appendix for introductory materials to each section of the report, additional information resources, and a list of relevant agency contacts.
Species Occurrences

F - Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi)  SOC

A - Western Toad (Anaxyrus boreas)  SOC

V - Castilleja gracillima (Slender Indian Paintbrush)  SOC

Legend

Model Icons
[ ] Suitable (native range)
[ ] Optimal Suitability
[ ] Moderate Suitability
[ ] Low Suitability
[ ] Suitable (introduced range)

Habitat Icons
[ ] Common
[ ] Occasional

Range Icons
[ ] Year-round
[ ] Summer
[ ] Winter
[ ] Migratory

Num Obs
Count of obs with 'good precision' (<=1000m)
* indicates additional 'poor precision' obs (1001m-10,000m)
**Delineation Criteria:** Individual occurrences are generally based upon a discretely mapped area provided by an observer and are not separated by any pre-defined distance. Individual clusters of plants mapped at fine spatial scales (separated by less than approximately 25-50 meters) may be grouped together into one occurrence if they are not separated by distinct areas of habitat or other features. Point observations are buffered to encompass locational uncertainty associated with the observation. (Last Updated: Jun 14, 2019)

**Predictive Models:** 100% Optimal (inductive), 23% Moderate (inductive)  
**Associated Habitats:** 1% Common, 1% Occasional

**M - Grizzly Bear (Ursus arctos) SOC**

**Species of Concern - Native Species** Global: G3G4  
**BLM:** THREATENED  
**DFW:** USFS: SGCN2-3

**Species of Concern - Native Species** Global: G4  
**USFS:** Proposed on Forests (BD, BRT, CG, HLC, KOOT, LOLO)

**Delineation Criteria** Occurrences represent the greatest extent of 1) Recovery Zone Boundaries, 2) Demographic Monitoring Areas, and 3) Current Known Distribution within Montana as defined in the 2018 Grizzly Bear Recovery Program annual report. This includes the Bitterroot Recovery Zone, which is not currently occupied by a resident population of Grizzly Bears. (Last Updated: Jul 05, 2019)

**Predictive Models:** 77% Optimal (inductive), 23% Moderate (inductive)  
**Associated Habitats:** 1% Common, 1% Occasional

**M - Wolverine (Gulo gulo) SOC**

**Species of Concern - Native Species** Global: G4  
**BLM:** THREATENED  
**DFW:** USFS: SGCN3

**Delineation Criteria** Confirmed area of occupancy supported by recent (post-1980), nearby (within 10 kilometers) observations of adults or juveniles. Tracking regions were defined by areas of primary habitat and adjacent female dispersal habitat as modeled by Inman et al. (2013). These regions were buffered by 1 kilometer in order to link smaller areas and account for potential inaccuracies in independent variables used in the model. (Last Updated: Sep 03, 2014)

**Predictive Models:** 70% Moderate (inductive), 30% Low (inductive)  
**Associated Habitats:** 46% Common, 19% Occasional

**B - Clark's Nutcracker (Nucifraga columbiana) SOC**

**Species of Concern - Native Species** Global: G5  
**USFS:** Species of Conservation Concern on Forests (FLAT)  
**BLM:** SENSITIVE  
**FWP:** SWAP: SGCN3  
**PIF:** 3

**Delineation Criteria** Observations with direct evidence of breeding activity or indirect evidence of breeding activity between early March and mid-July within forested habitats containing Whitebark Pine (Pinus albicaulis), Limber Pine (Pinus flexilis), or Ponderosa Pine (Pinus ponderosa). Observations are buffered by a minimum distance of 1,000 meters in order to encompass the breeding season size reported for the species or the locational uncertainty of the observation to a maximum distance of 10,000 meters. (Last Updated: Sep 25, 2015)

**Predictive Models:** 40% Moderate (inductive), 60% Low (inductive)  
**Associated Habitats:** 48% Common

**B - Black-backed Woodpecker (Picoides arcticus) SOC**

**Species of Concern - Native Species** Global: G5  
**USFS:** Sensitive - Known on Forests (BD, BRT, CG, HLC, KOOT, LOLO)

**Delineation Criteria** Confirmed breeding area based on the presence of a nest, chicks, or territorial adults during the breeding season. Point observation location is buffered by a distance of 1,000 meters in order to encompass the majority of home range sizes reported for the species or other organisms of a similar size and occurrence. (Last Updated: Apr 03, 2017)

**Predictive Models:** 13% Moderate (inductive), 43% Low (inductive)  
**Associated Habitats:** 21% Common

**M - Little Brown Myotis (Myotis lucifugus) SOC**

**Species of Concern - Native Species** Global: G3  
**USFS:** Sensitive - Known on Forests (BD, BRT, CG, HLC, KOOT, LOLO)

**Delineation Criteria** Confirmed area of occupancy based on the documented presence of mistnet captures, definitively identified acoustic recordings, or definitively identified roosting individuals of adults or juveniles. Point observation location is buffered by a distance of 1,000 meters in order to encompass the greater than 1,500 meters foraging distance reported for the species in New Brunswick, Canada and otherwise buffered by the locational uncertainty associated with the observation to a maximum distance of 10,000 meters. When cave locations are involved, point observations are mapped in the center of a one-square mile hexagon to protect the exact location of the cave entrance as per the Federal Cave Resource Protection Act and associated regulations (U.S. Code Title 16 Chapter 63, Code of Federal Regulations Title 43, Subtitle A Part 37). The outer edges of the hexagon are then buffered by a distance of 1,000 meters and otherwise by the locational uncertainty associated with the observation up to a maximum distance of 10,000 meters. All of the one-square mile hexagons intersecting this buffered area are presented as the Species Occurrence. (Last Updated: May 14, 2019)

**Predictive Models:** 100% Low (inductive)  
**Associated Habitats:** 53% Common, 47% Occasional

**M - Hoary Bat (Lasiurus cinereus) SOC**

**Species of Concern - Native Species** Global: G3G4  
**USFS:** Candidate on Forests (BD, BRT, CG, HLC, KOOT, LOLO)

**Delineation Criteria** Confirmed area of occupancy based on the documented presence (mystnet captures, definitively identified acoustic recordings, and definitively identified roosting individuals) of adults or juveniles. Point observation location is buffered by a minimum distance of 3,500 meters in order to be conservative about encompassing the maximum reported foraging distance for the congeneric Lasiurus borealis and otherwise buffered by the locational uncertainty associated with the observation up to a maximum distance of 10,000 meters. (Last Updated: May 14, 2019)

**Predictive Models:** 100% Low (inductive)  
**Associated Habitats:** 53% Common, 6% Occasional

**V - Pinus albicaulis (Whitebark Pine) SOC**

**Species of Concern - Native Species** Global: G3G4  
**USFS:** Candidate on Forests (BD, BRT, CG, HLC, KOOT, LOLO)

**Delineation Criteria** Point and/or polygonal observations are buffered by a minimum distance of 400 meters in order to account for stands instead of individual trees and to a maximum distance of 2,000 meters in order to encompass locational uncertainty associated with some common data sources for this species. (Last Updated: Sep 17, 2019)

**Predictive Models:** 70% Low (inductive)  
**Associated Habitats:** 1% Common

**M - Bison (Bos bison) SOC**

**Species of Concern - Native Species** Global: G3G4  
**BLM:** SENSITIVE

**Delineation Criteria** Individual clusters of plants mapped at fine spatial scales (separated by less than approximately 25-50 meters) may be grouped together into one occurrence if they are not separated by distinct areas of habitat or other features. Point observations are buffered to encompass locational uncertainty associated with the observation. (Last Updated: Jun 14, 2019)

**Predictive Models:** 77% Optimal (inductive), 23% Moderate (inductive)  
**Associated Habitats:** 1% Common, 1% Occasional
**Delineation Criteria**

- **Global:** G4  
  **State:** S2  
  **FWP SWAP:** SGCN2

**Managed areas where the species occurs for at least a portion of the year as a free-ranging herd, including areas where they are heavily managed to prevent the spread of brucellosis to cattle through spatial and temporal separation of bison and cattle.**  

(Last Updated: Mar 29, 2016)

**Associated Habitats:** 18% Common, 1% Occasional

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**Delineation Criteria**

- **Species of Concern - Native Species**
  - Global: G4G5  
  - State: S2S3  
  - MNPS: 3

**Individual occurrences are generally based upon a discretely mapped area provided by an observer and are not separated by any pre-defined distance. Individual clusters of plants mapped at fine spatial scales (separated by less than approximately 25-50 meters) may be grouped together into one occurrence if they are not separated by distinct areas of habitat or terrain features. Point observations are buffered to encompass any locational uncertainty associated with the observation.**  

(Last Updated: Nov 29, 2018)

**Associated Habitats:** 1% Common

---

**Delineation Criteria**

- **Species of Concern - Native Species**
  - Global: G5  
  - State: S2  
  - USFS: Sensitive - Known on Forests (BD, BRT, CG, HLC, KOOT, LOLO)

**Stream reaches where the species recent presence has been confirmed through detection of live individuals or recent shells. Detection locations are buffered up and downstream by 500 meters to encompass potential adjacent populations and occupied stream reaches separated by less than 2000 meters are combined into a single species occurrence. In order to reflect the importance of adjacent terrestrial habitats to survival, stream reaches are buffered 100 meters into the terrestrial habitat based on PACFISH/INFISH Riparian Conservation Area standards.**  

(Last Updated: Oct 19, 2018)

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**Delineation Criteria**

- **Species of Concern - Native Species**
  - Global: G5  
  - State: S2S3  
  - USFS: Sensitive - Known on Forests (BRT, CG)  
  - MNPS: 2

**Individual occurrences are generally based upon a discretely mapped area provided by an observer and are not separated by any pre-defined distance. Individual clusters of plants mapped at fine spatial scales (separated by less than approximately 25-50 meters) may be grouped together into one occurrence if they are not separated by distinct areas of habitat or terrain features. Point observations are buffered to encompass any locational uncertainty associated with the observation.**  

(Last Updated: Sep 06, 2017)

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**Delineation Criteria**

- **Species of Concern - Native Species**
  - Global: G4  
  - State: S3S4

**Potential Species of Concern - Native Species**
### Native Species

Summarized by: 20prvt0054 YellowstoneAirport (Custom Area of Interest)

Filtered by: MT_Status='Species of Concern', 'Special Status', 'Important Animal Habitat', 'Potential SOC'

#### Other Observed Species

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<th>View Predicted Models</th>
<th>View Associated Habitat</th>
<th>View Range Maps</th>
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<tbody>
<tr>
<td><strong>M - Uinta Ground Squirrel</strong> (Urocitellus armatus)</td>
<td>USFWS: Sec7</td>
<td>View Field Guide</td>
<td>View Predicted Models</td>
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<tr>
<td>Potential Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>USFS: MBTA; BCC10; BCC11; BCC17</td>
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<td>FWP SWAP: SGIN</td>
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<tr>
<td>Predictive Models: M 100% Moderate (inductive)</td>
<td>Associated Habitats: 36% Common</td>
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<tr>
<td><strong>B - Brewer's Sparrow</strong> (Spizella breweri)</td>
<td>BLM: SENSITIVE</td>
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<td>View Associated Habitat</td>
<td>View Range Maps</td>
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<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>USFS: MBTA; BCC10; BCC17</td>
<td>SGIN</td>
<td>FWP SWAP: SGIN</td>
<td>PIF: 2</td>
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<tr>
<td>Predictive Models: M 100% Moderate (inductive)</td>
<td>Associated Habitats: 16% Common, 1% Occasional</td>
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<td><strong>M - Porcupine</strong> (Erethizon dorsatum)</td>
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<td>View Predicted Models</td>
<td>View Associated Habitat</td>
<td>View Range Maps</td>
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<tr>
<td>Potential Species of Concern - Native Species</td>
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<td>USFS: MBTA; BCC10</td>
<td>FWP SWAP: SGIN</td>
<td>PIF: 2</td>
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<tr>
<td>Predictive Models: M 97% Moderate (inductive), 3% Low (inductive)</td>
<td>Associated Habitats: 66% Common</td>
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<td><strong>M - Canada Lynx</strong> (Lynx canadensis)</td>
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<td>View Predicted Models</td>
<td>View Associated Habitat</td>
<td>View Range Maps</td>
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<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>USFS: MBTA; BCC10</td>
<td>FWP SWAP: SGIN</td>
<td>PIF: 3</td>
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<td>Predictive Models: M 70% Moderate (inductive)</td>
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<td><strong>B - Cassin's Finch</strong> (Haemorhous cassini)</td>
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<td>View Predicted Models</td>
<td>View Associated Habitat</td>
<td>View Range Maps</td>
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<tr>
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<td>USFS: MBTA; BCC10</td>
<td>FWP SWAP: SGIN</td>
<td>PIF: 2</td>
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<tr>
<td>Predictive Models: M 77% Moderate (inductive), 23% Low (inductive)</td>
<td>Associated Habitats: 50% Common, 14% Occasional</td>
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<td><strong>B - Bald Eagle</strong> (Haliaeetus leucocephalus)</td>
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<tr>
<td>Special Status Species - Native Species</td>
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<td>USFS: MBTA; BCC10; BCC11; BCC17</td>
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<td>FWP SWAP: SGIN</td>
<td>PIF: 2</td>
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<td><strong>B - Trumpeter Swan</strong> (Cygnus buccinator)</td>
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<td>View Predicted Models</td>
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<td>View Range Maps</td>
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<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G4</td>
<td>USFS: MBTA; BCC10</td>
<td>SGIN</td>
<td>FWP SWAP: SGIN</td>
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<tr>
<td>Predictive Models: M 13% Moderate (inductive), 87% Low (inductive)</td>
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<td><strong>M - Silver-haired Bat</strong> (Lasionycteris noctivagans)</td>
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<td>View Predicted Models</td>
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<tr>
<td>Potential Species of Concern - Native Species</td>
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<td>FWP SWAP: SGIN</td>
<td>PIF: 1</td>
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<tr>
<td>Predictive Models: M 100% Low (inductive)</td>
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<tr>
<td><strong>B - Great Blue Heron</strong> (Ardea herodias)</td>
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<td>View Predicted Models</td>
<td>View Associated Habitat</td>
<td>View Range Maps</td>
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<tr>
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<td>USFS: MBTA</td>
<td>FWP SWAP: SGIN</td>
<td>PIF: 2</td>
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<tr>
<td>Predictive Models: M 93% Low (inductive)</td>
<td>Associated Habitats: 6% Common</td>
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<tr>
<td><strong>B - Northern Hawk Owl</strong> (Surnia ulula)</td>
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<td>View Predicted Models</td>
<td>View Associated Habitat</td>
<td>View Range Maps</td>
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<td>Global: G5</td>
<td>State: S3</td>
<td>USFWS: MBTA</td>
<td>FWP SWAP: SGCN3, SGIN</td>
<td>Associated Habitats: 28% Common, 1% Occasional</td>
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<th>Associated Habitats: 19% Common, 1% Occasional</th>
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<th>Global: G5</th>
<th>State: S3B</th>
<th>USFWS: MBTA</th>
<th>USFS: Sensitive - Known on Forests (BD, CG, HLC, KOOT, LOLO)</th>
<th>FWP SWAP: SGCN3</th>
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<th>USFS: Sensitive - Known on Forests (BD, CG, HLC, KOOT, LOLO)</th>
<th>FWP SWAP: SGCN2</th>
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<th>Associated Habitats: 4% Common, 2% Occasional</th>
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<th>USFWS: MBTA</th>
<th>USFS: Sensitive - Known on Forests (BD, CG, HLC, KOOT, LOLO)</th>
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<th>State: S3S5</th>
<th>USFWS: MBTA</th>
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<th>USFWS: MBTA</th>
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<th>Global: G5</th>
<th>State: S2S4</th>
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<th>Associated Habitats: 2% Common, 4% Occasional</th>
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<th>USFWS: MBTA</th>
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<th>USFWS: MBTA</th>
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<th>USFWS: MBTA</th>
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<th>Associated Habitats: 2% Common, 2% Occasional</th>
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</table>
Native Species

Summarized by: 20prvt0054 YellowstoneAirport (Custom Area of Interest)
Filtered by:

MT_Status='Species of Concern', 'Special Status', 'Important Animal Habitat', 'Potential SOC'

Other Potential Species

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<tr>
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<th>Scientific Name</th>
<th>Natural Resource Information System</th>
<th>Habitat Icons</th>
<th>Associated Habitats</th>
<th>Num Obs</th>
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<tbody>
<tr>
<td>B - Northern Goshawk (Accipiter gentilis)</td>
<td>SGCN3, SGIN</td>
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<td>M - Preble's Shrew (Sorex preblei)</td>
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<td>M - Water Vole (Microtus richardsoni)</td>
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<td>B - Yellow-billed Cuckoo (Coccyzus americanus)</td>
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<td>V - Eleocharis rostellata (Beaked Spikerush)</td>
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<td>B - Boreal Owl (Aegolius funereus)</td>
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<td>V - Utricularia intermedia (Flatleaf Bladderwort)</td>
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<td>B - Great Gray Owl (Strix nebulosa)</td>
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<td>B - Sage Thrasher (Oreoscoptes montanus)</td>
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<td>V - Stipa lettermanii (Letterman's Needlegrass)</td>
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<td>View Associated Habitat</td>
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<td>V - Cryptantha fendleri (Fendler Cat’s-eye)</td>
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<td>V - Carex scoparia (Pointed Club-rush)</td>
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<td>B - Brown Creeper (Certhia americana)</td>
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<td>FWP SWAP: SGCN3</td>
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</tr>
<tr>
<td>Predictive Models:</td>
<td>7% Moderate (inductive), 90% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>7% Common, 1% Occasional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B - Broad-tailed Hummingbird (Selasphorus platycercus)</td>
<td>PSOC</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Potential Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>State: S4B</td>
<td>USFWS: MBTA</td>
<td>FWP SWAP: SGIN</td>
<td></td>
</tr>
<tr>
<td>Predictive Models:</td>
<td>7% Moderate (inductive), 70% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>33% Common, 2% Occasional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B - Hooded Merganser (Lophodytes cucullatus)</td>
<td>PSOC</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Potential Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>State: S4</td>
<td>USFWS: MBTA</td>
<td>FWP SWAP: SGIN</td>
<td>PIF: 2</td>
</tr>
<tr>
<td>Predictive Models:</td>
<td>7% Moderate (inductive), 97% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>7% Common, 1% Occasional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>M - Wyoming Ground Squirrel (Urocitellus elegans)</td>
<td>PSOC</td>
<td></td>
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</tr>
<tr>
<td>Potential Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>State: S5S4</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Predictive Models:</td>
<td>100% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>23% Common, 1% Occasional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B - Evening Grosbeak (Coccothraustes vesperinus)</td>
<td>SOC</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>State: S3</td>
<td>USFWS: MBTA</td>
<td>FWP SWAP: SGCN3</td>
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</tr>
<tr>
<td>Predictive Models:</td>
<td>93% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>70% Common, 1% Occasional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>V - Adoxa moschatellina (Musk-root)</td>
<td>SOC</td>
<td></td>
<td>Not Assigned</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>State: S3</td>
<td>USFWS: Sensitive - Known on Forests (BD, CG, LOLO)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Predictive Models:</td>
<td>77% Low (inductive)</td>
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</tr>
<tr>
<td>B - Peregrine Falcon (Falco peregrinus)</td>
<td>SOC</td>
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</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G4</td>
<td>State: S3</td>
<td>USFWS: DM; MBTA; BCC10; BCC11; BCC17</td>
<td>FWP SWAP: SGCN3</td>
<td>PIF: 2</td>
</tr>
<tr>
<td>USFS: Sensitive - Known on Forests (BD, BR, CG, HLC, KOOT, LOLO)</td>
<td>BLM: SENSITIVE</td>
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<tr>
<td>Predictive Models:</td>
<td>67% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>5% Common, 15% Occasional</td>
<td></td>
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</tr>
<tr>
<td>B - Lewis’s Woodpecker (Melanerpes lewis)</td>
<td>SOC</td>
<td></td>
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</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G4</td>
<td>State: S2B</td>
<td>USFWS: MBTA; BCC10; BCC11; BCC17</td>
<td>FWP SWAP: SGCN2</td>
<td>PIF: 2</td>
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<tr>
<td>BLM: SENSITIVE</td>
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</tr>
<tr>
<td>Predictive Models:</td>
<td>43% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>15% Common, 8% Occasional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B - Veery (Catharus fuscescens)</td>
<td>SOC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>State: S3B</td>
<td>USFWS: MBTA</td>
<td>BLM: SENSITIVE</td>
<td>FWP SWAP: SGCN3</td>
</tr>
<tr>
<td>Predictive Models:</td>
<td>40% Low (inductive)</td>
<td>Associated Habitats:</td>
<td>4% Common, 1% Occasional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>M - Merriam’s Shrew (Sorex merriami)</td>
<td>SOC</td>
<td></td>
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<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G4</td>
<td>State: S3</td>
<td>FWP SWAP: SGCN3</td>
<td></td>
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</tr>
<tr>
<td>Predictive Models:</td>
<td>37% Low (inductive)</td>
<td>Associated Habits:</td>
<td>19% Common</td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>B - Green-tailed Towhee (Pipilo chlorurus)</th>
<th>SOC</th>
</tr>
</thead>
</table>

| Species of Concern - Native Species | Global: G5 | State: S3B | USFS: MBTA | FWP SWAP: SGCN3 | PIF: 3 |
|------------------------------------|-----------------|-----------|------------|-----------------|
| Predictive Models: | 20% Low (inductive) | Associated Habits: | 75% Common, 5% Occasional |

<table>
<thead>
<tr>
<th>B - Common Poorwill (Phasianellus nuttallii)</th>
<th>PSOC</th>
</tr>
</thead>
</table>

| Species of Concern - Native Species | Global: G5 | State: S4B | USFS: MBTA | FWP SWAP: SGCN3 | PIF: 3 |
|------------------------------------|-----------------|-----------|------------|-----------------|
| Predictive Models: | 20% Low (inductive) | Associated Habits: | 17% Common, 44% Occasional |

<table>
<thead>
<tr>
<th>B - Meesia triquetra (Meesia Moss)</th>
<th>SOC</th>
</tr>
</thead>
</table>

| Species of Concern - Native Species | Global: G5 | State: S2 | USFS: MBTA | FWP SWAP: SGCN3 | PIF: 3 |
|------------------------------------|-----------------|-----------|------------|-----------------|
| Predictive Models: | 1% Occasional | Associated Habits: | 1% Occasional |

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<thead>
<tr>
<th>B - Varied Thrush (Ixoreus naevius)</th>
<th>SOC</th>
</tr>
</thead>
</table>

| Species of Concern - Native Species | Global: G5 | State: S3B | USFS: MBTA; BCC11; BCC17 | BLM: SENSITIVE | FWP SWAP: SGCN3 | PIF: 3 |
|------------------------------------|-----------------|-----------|--------------|--------------|-----------------|
| Predictive Models: | 7% Low (inductive) | Associated Habits: | 28% Common, 37% Occasional |

<table>
<thead>
<tr>
<th>B - Long-billed Curlew (Numenius americanus)</th>
<th>SOC</th>
</tr>
</thead>
</table>

| Species of Concern - Native Species | Global: G5 | State: S3B | USFS: MBTA; BCC10; BCC11; BCC17 | BLM: SENSITIVE | FWP SWAP: SGCN3 | PIF: 2 |
|------------------------------------|-----------------|-----------|--------------|--------------|-----------------|
| Predictive Models: | 7% Low (inductive) | Associated Habits: | 1% Common, 16% Occasional |

<table>
<thead>
<tr>
<th>B - Black Tern (Chlidonias niger)</th>
<th>SOC</th>
</tr>
</thead>
</table>

| Species of Concern - Native Species | Global: G45 | State: S3B | USFS: MBTA | BLM: SENSITIVE | FWP SWAP: SGCN3 | PIF: 2 |
|------------------------------------|-----------------|-----------|------------|-----------------|
| Predictive Models: | 3% Low (inductive) | Associated Habits: | 2% Common, 1% Occasional |

<table>
<thead>
<tr>
<th>I - Polygonia progne (Gray Comma)</th>
<th>SOC</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habits:</td>
<td>46% Common</td>
<td></td>
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</tbody>
</table>

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<thead>
<tr>
<th>M - Fringed Myotis (Myotis thysanodes)</th>
<th>SOC</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>Species of Concern - Native Species</th>
<th>Global: G4</th>
<th>State: S3</th>
<th>BLM: SENSITIVE</th>
<th>FWP SWAP: SGCN3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habits:</td>
<td>44% Common, 45% Occasional</td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>M - Townsend's Big-eared Bat (Corynorhinus townsendii)</th>
<th>SOC</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>Species of Concern - Native Species</th>
<th>Global: G4</th>
<th>State: S3</th>
<th>USFS: Sensitive - Known on Forests (BD, BRT, CG, KOOT, LOLO)</th>
<th>BLM: SENSITIVE</th>
<th>FWP SWAP: SGCN3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habits:</td>
<td>43% Common, 42% Occasional</td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>B - Rufous Hummingbird (Selasphorus rufus)</th>
<th>PSOC</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Potential Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S4B</th>
<th>USFS: MBTA</th>
<th>PIF: 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habits:</td>
<td>36% Common, 16% Occasional</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B - Western Screech-Owl (Megascops kennicotti)</th>
<th>PSOC</th>
</tr>
</thead>
</table>

| Potential Species of Concern - Native Species | Global: G45 | State: S3S4 | USFS: MBTA | FWP SWAP: SGIN | PIF: 3 |
|--------------------------------|-----------------|-----------|------------|-----------------|
| Associated Habits: | 27% Common, 1% Occasional |

<table>
<thead>
<tr>
<th>B - Tennessee Warbler (Oreothlypis peregrina)</th>
<th>PSOC</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Potential Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3S4B</th>
<th>USFS: MBTA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habits:</td>
<td>25% Common</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>M - Spotted Bat (Euderma maculatum)</th>
<th>SOC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global:</td>
</tr>
<tr>
<td>-----------------------------------</td>
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</tr>
<tr>
<td><strong>Euphydryas gillettii</strong> (Gillette's Checkerspot)</td>
<td>G5</td>
</tr>
<tr>
<td><strong>Rhamphus aedon</strong> (Rhamphus aedon)</td>
<td>G5</td>
</tr>
<tr>
<td><strong>Phrynosoma hernandesi</strong></td>
<td>G5</td>
</tr>
<tr>
<td><strong>Vulpes velox</strong> (Gray Fox)</td>
<td>G5</td>
</tr>
</tbody>
</table>

Associated Habitats: 23% Common, 19% Occasional

<table>
<thead>
<tr>
<th>Species of Concern - Native Species</th>
<th>Global:</th>
<th>State:</th>
<th>USFS:</th>
<th>Sensitive - Known on Forests (BD, CG)</th>
<th>BLM:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>B - Black-crowned Night-Heron (Nycticorax nycticorax)</strong></td>
<td>G5</td>
<td>S2</td>
<td>SGCN3, SGIN</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>R - Greater Short-horned Lizard (Phrynosoma hernandesi)</strong></td>
<td>G5</td>
<td>S3</td>
<td>SGCN3, SGIN</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Associated Habitats: 5% Common, 15% Occasional

**Not Available**
<table>
<thead>
<tr>
<th>B - Pinyon Jay</th>
<th>(Gymnorhinus cyanocephalus)</th>
<th>SOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3B</th>
<th>USFWS: MBTA</th>
<th>FWP SWAP: SGCN3</th>
<th>PIF: 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habitats:</td>
<td>5% Common</td>
<td></td>
<td></td>
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</tbody>
</table>

| V - Primula incana  | (Mealy Primrose) | SOC | Species of Concern - Native Species | Global: G3 | State: S3 | USFWS: MBTA; BCC17 | FWP SWAP: SGCN3 |
|---------------------|------------------|-----|------------------------------------|-------------|-------------|--------------|-----------------|------|
| Associated Habitats: | 4% Common, 2% Occasional | | | | | | | |

<table>
<thead>
<tr>
<th>I - Colias gigantea</th>
<th>(Giant Sulphur)</th>
<th>PSOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3</th>
<th>USFWS: Sensitive - Known on Forests (BD)</th>
<th>MNPS: 2</th>
<th>USFS: Sensitive - Historically known, not recently documented on Forests (CG)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habitats:</td>
<td>4% Common</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

| I - Aeshna constricta  | (Lance-tipped Darter) | PSOC | Species of Concern - Native Species | Global: G5 | State: S3 | USFWS: MBTA | FWP SWAP: SGCN3 |
|------------------------|-----------------------|-----|------------------------------------|-------------|-------------|--------------|-----------------|------|
| Potential Species of Concern - Native Species | Global: G5 | State: S1S3 | USFS: Sensitive - Known on Forests (BD) | MNPS: 2 | USFS: Sensitive - Historically known, not recently documented on Forests (CG) | | | |
| Associated Habitats: | 3% Common, 1% Occasional | | | | | | | |

<table>
<thead>
<tr>
<th>I - Colias gigantea</th>
<th>(Giant Sulphur)</th>
<th>PSOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3</th>
<th>USFWS: Sensitive - Known on Forests (BD)</th>
<th>MNPS: 2</th>
<th>USFS: Sensitive - Historically known, not recently documented on Forests (CG)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habitats:</td>
<td>4% Common</td>
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</tbody>
</table>

| I - Aeshna constricta  | (Lance-tipped Darter) | PSOC | Species of Concern - Native Species | Global: G5 | State: S3 | USFWS: MBTA | FWP SWAP: SGCN3 |
|------------------------|-----------------------|-----|------------------------------------|-------------|-------------|--------------|-----------------|------|
| Potential Species of Concern - Native Species | Global: G5 | State: S1S3 | USFS: Sensitive - Known on Forests (BD) | MNPS: 2 | USFS: Sensitive - Historically known, not recently documented on Forests (CG) | | | |
| Associated Habitats: | 3% Common, 1% Occasional | | | | | | | |

<table>
<thead>
<tr>
<th>I - Boloria freija</th>
<th>(Freija Fritillary)</th>
<th>PSOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3S5</th>
<th>USFWS: Sensitive - Known on Forests (BD)</th>
<th>MNPS: 2</th>
<th>USFS: Sensitive - Historically known, not recently documented on Forests (CG)</th>
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</thead>
<tbody>
<tr>
<td>Associated Habitats:</td>
<td>3% Common, 1% Occasional</td>
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<thead>
<tr>
<th>I - Aeshna eremita</th>
<th>(Lake Darner)</th>
<th>PSOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3S4</th>
<th>USFWS: Sensitive - Known on Forests (BD)</th>
<th>MNPS: 2</th>
<th>USFS: Sensitive - Historically known, not recently documented on Forests (CG)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habitats:</td>
<td>3% Common</td>
<td></td>
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<thead>
<tr>
<th>B - Black-billed Cuckoo</th>
<th>(Coccyzus erythropthalmus)</th>
<th>SOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3S5</th>
<th>USFWS: MBTA; BCC11; BCC17</th>
<th>FWP SWAP: SGCN3, SGIN</th>
<th>PIF: 2</th>
</tr>
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<tbody>
<tr>
<td>Associated Habitats:</td>
<td>3% Common</td>
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<thead>
<tr>
<th>B - McCown's Longspur</th>
<th>(Rhynchosphenes mccownii)</th>
<th>SOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3S5</th>
<th>USFWS: MBTA; BCC10; BCC17; BCC17</th>
<th>FWP SWAP: SGCN3, SGIN</th>
<th>PIF: 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habitats:</td>
<td>3% Common</td>
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<thead>
<tr>
<th>B - White-faced Ibis</th>
<th>(Plegadis chihi)</th>
<th>SOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3S5</th>
<th>USFWS: MBTA; BCC10; BCC17; BCC17</th>
<th>FWP SWAP: SGCN3, SGIN</th>
<th>PIF: 2</th>
</tr>
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<tbody>
<tr>
<td>Associated Habitats:</td>
<td>3% Common</td>
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<thead>
<tr>
<th>B - Franklin's Gull</th>
<th>(Leucophaeus pipixcan)</th>
<th>SOC</th>
<th>Species of Concern - Native Species</th>
<th>Global: G5</th>
<th>State: S3S5</th>
<th>USFWS: MBTA; BCC10; BCC17; BCC17</th>
<th>FWP SWAP: SGCN3, SGIN</th>
<th>PIF: 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Associated Habitats:</td>
<td>3% Common</td>
<td></td>
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Structured Surveys
Summarized by: 20prvt0054 YellowstoneAirport (Custom Area of Interest)

The Montana Natural Heritage Program (MTNHP) records information on the locations where more than 80 different types of well-defined repeatable survey protocols capable of detecting an animal species or suite of animal species have been conducted by state, federal, tribal, university, or private consulting biologists. Examples of structured survey protocols tracked by MTNHP include: visual encounter and dip net surveys for pond breeding amphibians, point counts for birds, call playback surveys for selected bird species, visual surveys of migrating raptors, kick net stream reach surveys for macroinvertebrates, visual encounter cover object surveys for terrestrial mollusks, bat acoustic or mist net surveys, pitfall and/or snap trap surveys for small terrestrial mammals, track or camera trap surveys for large mammals, and trap surveys for turtles. Whenever possible, photographs of survey locations are stored in MTNHP databases.

MTNHP does not typically manage information on structured surveys for plants; surveys for invasive species may be a future exception.

Within the report area you have requested, structured surveys are summarized by the number of each type of structured survey protocol that has been conducted, the number of species detections/observations resulting from these surveys, and the most recent year a survey has been conducted.

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<td>E-Visual Aquatic Invasives</td>
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Forest and Woodland Systems
Conifer-dominated forest and woodland (xeric-mesic)

Rocky Mountain Poor Site Lodgepole Pine Forest
This ecological system is widespread but patchy in distribution in upper montane to subalpine zones of the Montana Rocky Mountains, and east into mountain island ranges of central Montana. These are upper montane to subalpine forests where the dominance of lodgepole pine (*Pinus contorta*) is related to fire history, topo-edaphic conditions and nutrient-poor soils. Presence of this system is determined more by substrate than by other factors. The most notable occurrence of this system is in the West Yellowstone Basin and surrounding Yellowstone Highlands, such as the Madison Plateau. In this region of Montana, cold-air ponding and coarse, rhyolitic outwash obsidian sands are the major factors contributing to the extensive development of this system in southwestern Montana. Fire is infrequent in this system, averaging every 150-400 years in subalpine forests. Following stand-replacing fires, lodgepole pine will colonize rapidly on sites that are too extreme for the establishment of other coniferous species, developing into dense, persistent, even-aged stands. Mature stands are primarily open, and develop past their initial even-aged structure to become a multi-aged structure. These stands last for longer intervals between disturbances than do conventional lodgepole pine-dominated stands.
Shrubland, Steppe and Savanna Systems

Sagebrush Steppe

Montane Sagebrush Steppe

This system dominates the montane and subalpine landscape of southwestern Montana from valley bottoms to subalpine ridges and is found as far north as Glacier National Park. It can also be seen in the island mountain ranges of the north-central and south-central portions of the state. It primarily occurs on deep-soiled to stony flats, ridges, nearly flat ridgetops, and mountain slopes. In general, this system occurs in areas of gentle topography, fine soils, subsurface moisture or mesic conditions, within zones of higher precipitation and areas of snow accumulation. It occurs on all slopes and aspects, variable substrates and all soil types. The shrub component of this system is generally dominated by mountain big sagebrush (Artemisia tridentata ssp. vaseyana). Other co-dominant shrubs include silver sagebrush (Artemisia cana ssp. viscidula), subalpine big sagebrush (Artemisia tridentata ssp. spiciformis), three tip sagebrush (Artemisia tridentata ssp. tripartita) and antelope bitterbrush (Purshia tridentata). Little sagebrush (Artemisia arbuscula ssp. arbuscula) shrublands are only found in southwestern Montana on sites with a perched water table. Wyoming big sagebrush (Artemisia tridentata ssp. wyomingensis) sites may be included within this system if occurrences are at montane elevations, and are associated with montane graminoids such as Idaho fescue (Festuca idahoensis), spike fescue (Leucopoa kingii), or poverty oatgrass (Danthonia intermedia). In areas where sage has been eliminated by human activities like burning, disking or poisoning, other shrubs may be dominant, especially rubber rabbitbrush (Ericameria nauseosa), and green rabbitbrush (Chrysothamnus viscidiflorus). Because of the mesic site conditions, most occurrences support a diverse herbaceous undergrowth of grasses and forbs. Shrub canopy cover is extremely variable, ranging from 10 percent to as high as 40 or 50 percent.

Recently Disturbed or Modified

Recently burned

Recently burned forest

Land cover is apparently modified by recent fires which have burned forest and woodland vegetation. Vegetation is a mixture of herbaceous, shrub, and tree species.

Forest and Woodland Systems

Conifer-dominated forest and woodland (xeric-mesic)

Rocky Mountain Lodgepole Pine Forest

This forested system is widespread in upper montane to subalpine zones of the Montana Rocky Mountains, and east into island ranges of north-central Montana and the Bighorn and Beartooth ranges of south-central Montana. These are montane to subalpine forests where the dominance of lodgepole pine (Pinus contorta) is related to fire history and topoedaphic conditions. In Montana, elevation ranges from 975 to 2,743 meters (3,200-9000 feet). These forests occur on flats to slopes of all degrees and aspect, as well as valley bottoms. Fire is frequent, and stand-replacing fires are common. Following stand-replacing fires, lodgepole pine will rapidly colonize and develop into dense, even-aged stands. Most forests in this ecological system occur as early- to mid-successional forests persisting for 50-200 years on warmer, lower elevation forests, and 150-400 years in subalpine forests. They generally occur on dry to intermediate sites with a wide seasonal range of temperatures and long precipitation-free periods in summer. Snowfall is heavy and supplies the major source of soil water used for growth in early summer. Vigorous stands occur where the precipitation exceeds 533 millimeters (21 inches). These lodgepole forests are typically associated with rock types weathering to acidic substrates, such as granite and rhyolite. In west-central Montana ranges such the Big Belts and the Rocky Mountain Front, these forests are found on limestone substrates. These systems are especially well developed on the broad ridges and high valleys near and east of the Continental Divide. Succession proceeds at different rates, moving relatively quickly on low-elevation, mesic sites and particularly slowly in high-elevation forests such as those along the Continental Divide in Montana.

Human Land Use

Developed

Commercial / Industrial

Businesses, industrial parks, hospitals, airports; utilities in commercial/industrial areas.

Human Land Use

Developed

Other Roads

County, city and or rural roads generally open to motor vehicles.

Recently Disturbed or Modified

Recently burned

Post-Fire Recovery

Recently Disturbed or Modified

Harvested Forest

Harvested forest-shrub regeneration

Land cover has been modified by logging. New growth is primarily shrubs.
Recently Disturbed or Modified
Harvested Forest

Land cover has been modified by logging. New growth is primarily trees.

Wetland and Riparian Systems
Floodplain and Riparian

This ecological system is found throughout the Rocky Mountain and Colorado Plateau regions. In Montana, it ranges from approximately 945 to 2,042 meters (3,100 to 6,700 feet), characteristically occurring as a mosaic of multiple communities that are tree-dominated with a diverse shrub component. It is dependent on a natural hydrologic regime, especially annual to episodic flooding. Occurrences are found within the flood zone of rivers, on islands, sand or cobble bars, and on immediate streambanks. It can form large, wide occurrences on mid-channel islands in larger rivers or narrow bands on small, rocky canyon tributaries and well-drained benches. It is also typically found in backwater channels and other perennially wet but less scoured sites, such as floodplain swales and irrigation ditches. In some locations, occurrences extend into moderately high intermountain basins where the adjacent vegetation is sage steppe. Dominant trees may include boxelder maple (*Acer negundo*), narrowleaf cottonwood (*Populus angustifolia*), Plains cottonwood (*Populus deltoides*), Douglas-fir (*Pseudotsuga menziesii*), peachleaf willow (*Salix amygdaloides*), or Rocky Mountain juniper (*Juniperus scopulorum*). Dominant shrubs include Rocky Mountain maple (*Acer glabrum*), thinleaf alder (*Alnus incana*), river birch (*Betula occidentalis*), redbud dogwood (*Cornus sericea*), chokecherry (*Prunus virginiana*), skunkbush sumac (*Rhus trilobata*), Drummond’s willow (*Salix drummondiana*), sandbar willow (*Salix exigua*), Pacific willow (*Salix lucida*), rose (*Rosa species*), silver buffaloberry (*Shepherdia argentea*), or snowberry (*Symphoricarpos species*). Exotic trees of Russian olive (*Elaeagnus angustifolia*) and saltcedar (*Tamarix species*) may invade some stands in southeastern and south-central Montana.

Recently Disturbed or Modified
Harvested Forest

Land cover has been modified by logging. New growth is primarily herbaceous species.

Wetland and Riparian Systems
Open Water

All areas of open water, generally with less than 25% cover of vegetation or soil

Human Land Use
Developed

Vegetation (primarily grasses) planted in developed settings for recreation, erosion control, or aesthetic purposes. Impervious surfaces account for less than 20% of total cover. This category often includes highway and railway rights of way and graveled rural roads.

**Additional Limited Land Cover**

1% (262 Acres) Alpine-Montane Wet Meadow
1% (239 Acres) Rocky Mountain Lower Montane, Foothill, and Valley Grassland
1% (233 Acres) Rocky Mountain Subalpine-Montane Riparian Woodland
1% (158 Acres) Insect-Killed Forest
1% (121 Acres) Burned Sagebrush
1% (113 Acres) Rocky Mountain Subalpine-Montane Riparian Shrubland
1% (102 Acres) Low Intensity Residential
1% (77 Acres) Low Sagebrush Shrubland
<1% (61 Acres) Major Roads
<1% (48 Acres) High Intensity Residential
<1% (37 Acres) Aspen Forest and Woodland
<1% (35 Acres) Rocky Mountain Subalpine-Upper Montane Grassland
<1% (31 Acres) Emergent Marsh
<1% (27 Acres) Rocky Mountain Montane Douglas-fir Forest and Woodland
<1% (25 Acres) Mountain Mahogany Woodland and Shrubland
<1% (10 Acres) Rocky Mountain Subalpine-Montane Mesic Meadow
<1% (6 Acres) Rocky Mountain Wooded Vernal Pool
<1% (5 Acres) Rocky Mountain Subalpine Dry-Mesic Spruce-Fire Forest and Woodland
<1% (1 Acres) Rocky Mountain Subalpine Deciduous Shrubland
<1% (0 Acres) Great Plains Saline Depression Wetland
<1% (0 Acres) Rocky Mountain Subalpine Mesic Spruce-Fir Forest and Woodland
Wetland and Riparian Mapping

P - Palustrine

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<tr>
<th>AB - Aquatic Bed</th>
<th>F - Semipermanently Flooded</th>
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<td>x - Excavated</td>
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US - Unconsolidated Shore

| A - Temporarily Flooded | 3 Acres | PUSAx |
| x - Excavated          | <1 Acres | PUSCx |
| C - Seasonally Flooded | <1 Acres | PUSCx |
| x - Excavated          | <1 Acres | PUSCx |

EM - Emergent

| A - Temporarily Flooded | 245 Acres | PEMA |
| (no modifier)          |          |      |
| h - Diked/Impounded    |          | PEMAh |
| C - Seasonally Flooded | 91 Acres  |      |
74 Acres PEMC

17 Acres PEMCh

6 Acres PEMF

SS - Scrub-Shrub

A - Temporarily Flooded 265 Acres

C - Seasonally Flooded 8 Acres

PEMC

h - Diked/Impounded

P - Palustrine, SS - Scrub-Shrub

Wetlands dominated by woody vegetation less than 6 meters (20 feet) tall. Woody vegetation includes tree saplings and trees that are stunted due to environmental conditions.

6 Acres PEMC

6 Acres PEMCh

6 Acres PEMF

F - Semipermanently Flooded

PSSA

h - Diked/Impounded

<1 Acres PSSAh

6 Acres PEMC

h - Diked/Impounded

PSSA

h - Diked/Impounded

PSSC

F - Semipermanently Flooded

PSSC

C - Seasonally Flooded

A - Temporarily Flooded

PSSA

h - Diked/Impounded

PSSAh

F - Semipermanently Flooded

L1UBHh

H - Permanently Flooded

158 Acres

L - Lacustrine (Lakes)

1 - Limnetic

UB - Unconsolidated Bottom

H - Permanently Flooded

158 Acres

L - Lacustrine (Lakes), 1 - Limnetic, UB - Unconsolidated Bottom

Deep waterbodies with mud or silt covering at least 25% of the bottom.

R - Riverine (Rivers)

2 - Lower Perennial

UB - Unconsolidated Bottom

F - Semipermanently Flooded

2 Acres

R2UBF

H - Permanently Flooded

140 Acres

R - Riverine (Rivers), 2 - Lower Perennial, UB - Unconsolidated Bottom

Stream channels where the substrate is at least 25% mud, silt or other fine particles.

8 Acres PEMC

17 Acres PEMCh

6 Acres PEMF

F - Semipermanently Flooded

PSSA

h - Diked/Impounded

<1 Acres PSSAh

6 Acres PEMC

h - Diked/Impounded

PSSA

h - Diked/Impounded

PSSC

F - Semipermanently Flooded

PSSC

C - Seasonally Flooded

A - Temporarily Flooded

PSSA

h - Diked/Impounded

PSSAh

F - Semipermanently Flooded

PSSC

C - Seasonally Flooded

A - Temporarily Flooded

PSSC

C - Seasonally Flooded

R2UBH

R - Riverine (Rivers)

2 - Lower Perennial, UB - Unconsolidated Bottom

Shorelines with less than 75% areal cover of stones, boulders, or bedrock and less than 30% vegetation cover. The area is also irregularly exposed due to seasonal or irregular flooding and subsequent drying.

8 Acres PEMC

17 Acres PEMCh

6 Acres PEMF

F - Semipermanently Flooded

PSSC

C - Seasonally Flooded

A - Temporarily Flooded

PSSC

C - Seasonally Flooded

R2UBH

R - Riverine (Rivers)

2 - Lower Perennial, UB - Unconsolidated Bottom

Stream channels where the substrate is at least 25% mud, silt or other fine particles.

R - Riverine (Rivers)

3 - Upper Perennial

UB - Unconsolidated Bottom

F - Semipermanently Flooded

18 Acres

R3UBF

C - Seasonally Flooded

56 Acres

R - Riverine (Rivers), 3 - Upper Perennial, UB - Unconsolidated Bottom

Stream channels where the substrate is at least 25% mud, silt or other fine particles.

4 - Intermittent

SB - Stream Bed

C - Seasonally Flooded

7 Acres

R - Riverine (Rivers), 4 - Intermittent, SB - Stream Bed

Active channel that contains periodic water flow.

R - Riverine (Rivers)

3 - Upper Perennial, UB - Unconsolidated Bottom

Stream channels where the substrate is at least 25% mud, silt or other fine particles.

R - Riverine (Rivers)

4 - Intermittent, SB - Stream Bed

Active channel that contains periodic water flow.

R - Riverine (Rivers)

2 - Lower Perennial, US - Unconsolidated Shore

Shorelines with less than 75% areal cover of stones, boulders, or bedrock and less than 30% vegetation cover. The area is also irregularly exposed due to seasonal or irregular flooding and subsequent drying.

85 Acres Rp1SS

85 Acres Rp1SS

This type of riparian area is dominated by woody vegetation that is less than 6 meters (20 feet) tall. Woody vegetation includes tree saplings and trees that are stunted due to environmental conditions.

74 Acres Rp1FO

74 Acres Rp1FO

This riparian class has woody vegetation that is greater than 6 meters (20 feet) tall.

58 Acres Rp1EM

58 Acres Rp1EM

Riparian areas that have erect, rooted herbaceous vegetation during most of the growing season.

2 Acres Rp2SS

2 Acres Rp2SS

This type of riparian area is dominated by woody vegetation that is less than 6 meters (20 feet) tall. Woody vegetation includes tree saplings and trees that are stunted due to environmental conditions.

58 Acres Rp1EM

58 Acres Rp1EM

Riparian areas that have erect, rooted herbaceous vegetation during most of the growing season.

85 Acres Rp1SS

85 Acres Rp1SS

This type of riparian area is dominated by woody vegetation that is less than 6 meters (20 feet) tall. Woody vegetation includes tree saplings and trees that are stunted due to environmental conditions.
Land Management

Summarized by: 20prvt0054 YellowstoneAirport (Custom Area of Interest)

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<td><strong>Federal</strong></td>
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<td>US Forest Service</td>
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<tr>
<td>USFS Owned</td>
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<td>USFS Ranger Districts</td>
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<td>Custer Gallatin National Forest, Hebgen Lake Ranger District</td>
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<td>12,182 Acres</td>
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<td>USFS National Forest Boundaries</td>
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<td>USFS Special Interest Areas</td>
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17,586 Acres (92%)
17,544 Acres (91%)
10,864 Acres (57%)

6,680 Acres (35%)

42 Acres (<1%)

A program of the Montana State Library's Natural Resource Information System operated by the University of Montana.
<table>
<thead>
<tr>
<th>Private Lands or Unknown Ownership</th>
<th>Ownership</th>
<th>Tribal</th>
<th>Easements</th>
<th>Other Boundaries (possible overlap)</th>
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<td></td>
<td>1,622 Acres (8%)</td>
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</table>
Within the report area you have requested, citations for all reports and publications associated with plant or animal observations in Montana Natural Heritage Program (MTNHP) databases are listed and, where possible, links to the documents are included.

The MTNHP plans to include reports associated with terrestrial and aquatic communities in the future as allowed for by staff resources. If you know of reports or publications associated with species or biological communities within the report area that are not shown in this report, please let us know: mtnhp@mt.gov


Invasive and Pest Species

Summarized by: 20prvt0054 YellowstoneAirport (Custom Area of Interest)

Aquatic Invasive Species

- **I - Potamopyrgus antipodarum** (*New Zealand Mudsnail*)
  - AIS
  - Global: **GS** State: **SNA**
  - View in Field Guide

Aquatic Invasive Species - Non-native Species

<table>
<thead>
<tr>
<th># Obs</th>
<th>Predictive Model</th>
<th>Associated Habitat</th>
<th>Range</th>
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<tr>
<td>9</td>
<td>Not Available</td>
<td>Not Assigned</td>
<td></td>
</tr>
</tbody>
</table>

Noxious Weeds: Priority 1A

- **V - Centaurea solstitialis** (*Yellow Starthistle*)
  - N1A
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 17% Moderate (inductive), 27% Low (inductive)

- **V - Isatis tinctoria** (*Dyer's Woad*)
  - N1A
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 7% Moderate (inductive), 23% Low (inductive)

Noxious Weeds: Priority 1B

- **V - Echium vulgare** (*Blueweed*)
  - N1B
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 100% Moderate (inductive)

Noxious Weeds: Priority 2A

- **V - Hieracium praealtum** (*Kingdevil Hawkweed*)
  - N2A
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 23% Moderate (inductive), 77% Low (inductive)

- **V - Hieracium aurantiacum** (*Orange Hawkweed*)
  - N2A
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 100% Low (inductive)

- **V - Hieracium caespitosum** (*Meadow Hawkweed*)
  - N2A
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 100% Low (inductive)

- **V - Lepidium latifolium** (*Perennial Pepperweed*)
  - N2A
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 3% Low (inductive)

Noxious Weeds: Priority 2B

- **V - Berteroa incana** (*Hoary False-alyssum*)
  - N2B
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 100% Optimal (inductive)

- **V - Linaria vulgaris** (*Yellow Toadflax*)
  - N2B
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 100% Optimal (inductive)

- **V - Leucanthemum vulgare** (*Oxeye Daisy*)
  - N2B
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: 23% Optimal (inductive), 77% Moderate (inductive)

- **V - Cynoglossum officinale** (*Common Hound's-tongue*)
  - N2B
  - View in Field Guide
  - View Predicted Models
  - View Range Maps
  - Global: **GNR** State: **SNA**
  - Predictive Models: Not Available

---

Legend

Model Icons
- Suitable (native range)
- Optimal Suitability
- Moderate Suitability
- Low Suitability
- Suitable (introduced range)
- Occasional
- Suspect (invasive / pest)
- Documented (invasive / pest)
- Released (biocontrol)
- Established (biocontrol)

Habitat Icons
- Common
- Occasional
- Range Icons
- Suspect (invasive / pest)
- Documented (invasive / pest)
- Released (biocontrol)
- Established (biocontrol)

Num Obs Count of obs with 'good precision' (<=1000m) + indicates additional 'poor precision' obs (1001m-10,000m)

Latitude 44.8426 Longitude -111.0562
44.81795 -111.7151

- Indicates additional 'poor precision' obs (1001m-10,000m)

Num Obs Count of obs with 'good precision' (<=1000m) + indicates additional 'poor precision' obs (1001m-10,000m)
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<tr>
<td><strong>Cirsium arvense</strong> <em>(Canada Thistle)</em></td>
<td>3% Optimal (inductive), 97% Moderate (inductive)</td>
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<tr>
<td><strong>Centaurea stoebe</strong> <em>(Spotted Knapweed)</em></td>
<td>93% Moderate (inductive), 7% Low (inductive)</td>
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<tr>
<td><strong>Linaria dalmatica</strong> <em>(Dalmatian Toadflax)</em></td>
<td>100% Low (inductive)</td>
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<td>Not Assigned</td>
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<tr>
<td><strong>Lepidium draba</strong> <em>(Whitetop)</em></td>
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<tr>
<td><strong>Euphorbia virgata</strong> <em>(Leafy Spurge)</em></td>
<td>47% Low (inductive)</td>
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<tr>
<td><strong>Potentilla recta</strong> <em>(Sulphur Cinquefoil)</em></td>
<td>20% Low (inductive)</td>
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<tr>
<td><strong>Tanacetum vulgare</strong> <em>(Common Tansy)</em></td>
<td>100% Moderate (inductive)</td>
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**Regulated Weeds: Priority 3**

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</thead>
<tbody>
<tr>
<td><strong>Bromus tectorum</strong> <em>(Cheatgrass)</em></td>
<td>100% Moderate (inductive)</td>
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**Biocontrol Species**

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<tbody>
<tr>
<td><strong>Mecinus janthinus</strong> <em>(Yellow Toadflax Stem-boring Weevil)</em></td>
<td>100% Optimal (inductive)</td>
<td><img src="https://example.com" alt="20" /></td>
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<td><img src="https://example.com" alt="R" /></td>
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<tr>
<td><strong>Oberea erythrocephala</strong> <em>(Red-headed Leafy Spurge Stem Borer)</em></td>
<td>17% Moderate (inductive), 53% Low (inductive)</td>
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<td>Not Assigned</td>
<td><img src="https://example.com" alt="R" /></td>
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</tbody>
</table>
Biocontrol Species - Non-native Species

Predictive Models: 77% Low (inductive)
**Introduction**

The Montana Natural Heritage Program (MTNHP) is Montana’s source for reliable and objective information on Montana’s native species and habitats, emphasizing those of conservation concern. MTNHP was created by the Montana legislature in 1983 as part of the Natural Resource Information System (NRIS) at the Montana State Library (MSL). MTNHP is “a program of information acquisition, storage, and retrieval for data relating to the flora, fauna, and biological community types of Montana” (MCA 90-15-102). MTNHP’s activities are guided by statute (MCA 90-15) as well as through ongoing interaction with, and feedback from, principal data source agencies such as Montana Fish, Wildlife, and Parks, the Montana Department of Environmental Quality, the Montana Department of Natural Resources and Conservation, the Montana University System, the US Forest Service, and the US Bureau of Land Management. The enabling legislation for MTNHP provides the State Library with the option to contract the operation of the Program. Since 2006, MTNHP has been operated as a program under the Office of the Vice President for Research and Creative Scholarship at the University of Montana (UM) through a renewable 2-year contract with the MSL. Since the first staff was hired in 1985, the Program has logged a long record of success, and developed into a highly respected, service-oriented program. MTNHP is widely recognized as one of the most advanced and effective of over 80 natural heritage programs throughout the Western Hemisphere.

**Vision**

Our vision is that public agencies, the private sector, the education sector, and the general public will trust and rely upon MTNHP as the source for information and expertise on Montana’s species and habitats, especially those of conservation concern. We strive to provide easy access to our information in order for users to save time and money, speed environmental reviews, and inform decision making.

**Core Values**

- We endeavor to be a single statewide source of accurate and up-to-date information on Montana’s plants, animals, and aquatic and terrestrial biological communities.
- We actively listen to our data users and work responsively to meet their information and training needs.
- We strive to provide neutral, trusted, timely, and equitable service to all of our information users.
- We make every effort to be transparent to our data users in setting work priorities and providing data products.

**Confidentiality**

All information requests made to the Montana Natural Heritage Program are considered library records and are protected from disclosure by the Montana Library Records Confidentiality Act (MCA 22-1-11).

**Information Managed**

Information managed at the Montana Natural Heritage Program includes: (1) lists of, and basic information on, plant and animal species and biological communities; (2) plant and animal surveys, observations, species occurrences, predictive distribution models, range polygons, and conservation status ranks; and (3) land cover and wetland and riparian mapping and the conservation status of these and other biological communities.
Data Use Terms and Conditions

- Montana Natural Heritage Program (MTNHP) products and services are based on biological data and the objective interpretation of those data by professional scientists. MTNHP does not advocate any particular philosophy of natural resource protection, management, development, or public policy.

- MTNHP has no natural resource management or regulatory authority. Products, statements, and services from MTNHP are intended to inform parties as to the state of scientific knowledge about certain natural resources, and to further develop that knowledge. The information is not intended as natural resource management guidelines or prescriptions or a determination of environmental impacts. MTNHP recommends consultation with appropriate state, federal, and tribal resource management agencies and authorities in the area where your project is located.

- Information on the status and spatial distribution of biological resources produced by MTNHP are intended to inform parties of the state-wide status, known occurrence, or the likelihood of the presence of those resources. These products are not intended to substitute for field-collected data, nor are they intended to be the sole basis for natural resource management decisions.

- MTNHP does not portray its data as exhaustive or comprehensive inventories of rare species or biological communities. Field verification of the absence or presence of sensitive species and biological communities will always be an important obligation of users of our data.

- MTNHP responds equally to all requests for products and services, regardless of the purpose or identity of the requester.

- Because MTNHP constantly updates and revises its databases with new data and information, products will become outdated over time. Interested parties are encouraged to obtain the most current information possible from MTNHP, rather than using older products. We add, review, update, and delete records on a daily basis. Consequently, we strongly advise that you update your MTNHP data sets at a minimum of every three months for most applications of our information.

- MTNHP data require a certain degree of biological expertise for proper analysis, interpretation, and application. Our staff is available to advise you on questions regarding the interpretation or appropriate use of the data that we provide. Contact information for MTNHP staff is posted at: http://mtnhp.org/contact.asp

- The information provided to you by MTNHP may include sensitive data that if publicly released might jeopardize the welfare of threatened, endangered, or sensitive species or biological communities. This information is intended for distribution or use only within your department, agency, or business. Subcontractors may have access to the data during the course of any given project, but should not be given a copy for their use on subsequent, unrelated work.

- MTNHP data are made freely available. Duplication of hard-copy or digital MTNHP products with the intent to sell is prohibited without written consent by MTNHP. Should you be asked by individuals outside your organization for the type of data that we provide, please refer them to MTNHP.

- MTNHP and appropriate staff members should be appropriately acknowledged as an information source in any third-party product involving MTNHP data, reports, papers, publications, or in maps that incorporate MTNHP graphic elements.

- Sources of our data include museum specimens, published and unpublished scientific literature, field surveys by state and federal agencies and private contractors, and reports from knowledgeable individuals. MTNHP actively solicits and encourages additions, corrections and updates, new observations or collections, and comments on any of the data we provide.

- MTNHP staff and contractors do not cross or survey privately-owned lands without express permission from the landowner. However, the program cannot guarantee that information provided to us by others was obtained under adherence to this policy.
Suggested Contacts for Natural Resource Agencies

As required by Montana statute (MCA 90-15), the Montana Natural Heritage Program works with state, federal, tribal, nongovernmental organizations, and private partners to ensure that the latest animal and plant distribution and status information is incorporated into our databases so that it can be used to inform a variety of planning processes and management decisions. In addition to the information you receive from us, we encourage you to contact state, federal, and tribal resource management agencies in the area where your project is located. They may have additional data or management guidelines relevant to your efforts. In particular, we encourage you to contact the Montana Department of Fish, Wildlife, and Parks for the latest data and management information regarding hunted and high-profile management species and to use the U.S. Fish and Wildlife Service’s Information Planning and Conservation (IPAC) website http://ecos.fws.gov/ipac/ regarding U.S. Endangered Species Act listed Threatened, Endangered, or Candidate species.

For your convenience, we have compiled a list of relevant agency contacts and links below:

**Montana Fish, Wildlife, and Parks**

<table>
<thead>
<tr>
<th>Fish Species</th>
<th>Zachary Shattuck</th>
<th>Eric Roberts</th>
<th>Lauri Hanauska-Brown</th>
<th>John Vore</th>
<th>Smith Wells – MFWP Data Analyst</th>
<th>Ryan Alger – MFWP Data Analyst</th>
<th>Renee Lemon</th>
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<tbody>
<tr>
<td>American Bison</td>
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<tr>
<td>Managed Terrestrial Game and Nongame Animal Data</td>
<td>Smith Wells – MFWP Data Analyst</td>
<td>Ryan Alger – MFWP Data Analyst</td>
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<td>Fish and Wildlife Recommendations for Subdivision Development</td>
<td></td>
<td><a href="mailto:Kammi.McClain@mt.gov">Kammi.McClain@mt.gov</a> (406) 444-2612</td>
<td><a href="mailto:kim.wedde@mt.gov">kim.wedde@mt.gov</a> (406) 444-5594</td>
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</tbody>
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For your convenience, we have compiled a list of relevant agency contacts and links below:

**Montana Fish, Wildlife, and Parks**

<table>
<thead>
<tr>
<th>Fish Species</th>
<th>Zachary Shattuck</th>
<th>Eric Roberts</th>
<th>Lauri Hanauska-Brown</th>
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United States Fish and Wildlife Service:
Information Planning and Conservation (IPAC) website: [http://ecos.fws.gov/ipac/](http://ecos.fws.gov/ipac/)

Bureau of Land Management

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<tr>
<th>Montana Field Office Contacts:</th>
<th>Billings</th>
<th>(406) 896-5013</th>
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<tr>
<td></td>
<td>Butte</td>
<td>(406) 533-7600</td>
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<td>Lewistown</td>
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<td>Malta</td>
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<td>Missoula</td>
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United States Forest Service

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<tr>
<th>Wildlife Program Leader</th>
<th>Tammy Fletcher</th>
<th><a href="mailto:tammyfletcher@fs.fed.us">tammyfletcher@fs.fed.us</a></th>
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<tr>
<td>Wildlife Ecologist</td>
<td>Cara Staab</td>
<td><a href="mailto:cstaab@fs.fed.us">cstaab@fs.fed.us</a></td>
<td>(406) 329-3677</td>
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<tr>
<td>Fish Program Leader</td>
<td>Scott Spaulding</td>
<td><a href="mailto:scottspaulding@fs.fed.us">scottspaulding@fs.fed.us</a></td>
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<td>Fish Ecologist</td>
<td>Cameron Thomas</td>
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<tr>
<td>TES Program</td>
<td>Lydia Allen</td>
<td><a href="mailto:lrallen@fs.fed.us">lrallen@fs.fed.us</a></td>
<td>(406) 329-3558</td>
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<tr>
<td>Interagency Grizzly Bear Coordinator</td>
<td>Scott Jackson</td>
<td><a href="mailto:sjackson03@fs.fed.us">sjackson03@fs.fed.us</a></td>
<td>(406) 329-3664</td>
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<tr>
<td>Regional Botanist</td>
<td>Steve Shelly</td>
<td><a href="mailto:sshelly@fs.fed.us">sshelly@fs.fed.us</a></td>
<td>(406) 329-3041</td>
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<tr>
<td>Invasive Species Program Manager</td>
<td>Michelle Cox</td>
<td><a href="mailto:michelle.cox2@usda.gov">michelle.cox2@usda.gov</a></td>
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Tribal Nations

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<td>Chippewa Creek Tribe - Rocky Boy’s Reservation</td>
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<td>Salish &amp; Kootenai Tribes - Flathead Reservation</td>
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Natural Heritage Programs and Conservation Data Centers in Surrounding States and Provinces

- [Alberta Conservation Information Management System](http://ecos.fws.gov/ipac/)
- [British Columbia Conservation Data Centre](http://www.fws.gov/montanafieldoffice/)
- [Idaho Natural Heritage Program](http://www.fws.gov/montanafieldoffice/)
- [North Dakota Natural Heritage Program](http://www.fws.gov/montanafieldoffice/)
- [Saskatchewan Conservation Data Centre](http://www.fws.gov/montanafieldoffice/)
- [South Dakota Natural Heritage Program](http://www.fws.gov/montanafieldoffice/)
- [Wyoming Natural Diversity Database](http://www.fws.gov/montanafieldoffice/)
Invasive Species Management Contacts and Information

Aquatic Invasive Species
- Montana Fish, Wildlife, and Parks Aquatic Invasive Species staff
- Montana Department of Natural Resources and Conservation's Aquatic Invasive Species Grant Program
- Montana Invasive Species Council (MISC)
- Upper Columbia Conservation Commission (UC3)

Noxious Weeds
- Montana Weed Control Association Contacts Webpage
- Montana Biological Weed Control Coordination Project
- Montana Department of Agriculture - Noxious Weeds
- Montana Weed Control Association
- Montana Fish, Wildlife, and Parks - Noxious Weeds
- Montana State University Integrated Pest Management Extension
- Integrated Noxious Weed Management after Wildfires
Introduction to Native Species

Within the report area you have requested, separate summaries are provided for: (1) Species Occurrences (SO) for plant and animal Species of Concern, Special Status Species (SSS), Important Animal Habitat (IAH) and some Potential Plant Species of Concern; (2) other observed non Species of Concern or Species of Concern without suitable documentation to create Species Occurrence polygons; and (3) other non-documented species that are potentially present based on their range, predicted suitable habitat model output, or presence of associated habitats. Each of these summaries provides the following information when present for a species: (1) the number of Species Occurrences and associated delineation criteria for construction of these polygons that have long been used for considerations of documented Species of Concern in environmental reviews; (2) the number of observations of each species; (3) the geographic range polygons for each species that the report area overlaps; (4) predicted relative habitat suitability classes that are present if a predicted suitable habitat model has been created; (5) the percent of the report area that is mapped as commonly associated or occasionally associated habitat as listed for each species in the Montana Field Guide; and (6) a variety of conservation status ranks and links to species accounts in the Montana Field Guide. Details on each of these information categories are included under relevant section headers below or are defined on our Species Status Codes page. In presenting this information, the Montana Natural Heritage Program (MTNHP) is working towards assisting the user with rapidly determining what species have been documented and what species are potentially present in the report area. We remind users that this information is likely incomplete as surveys to document native and introduced species are lacking in many areas of the state, information on introduced species has only been tracked relatively recently, the MTNHP’s staff and resources are restricted by declining budgets, and information is constantly being added and updated in our databases. Thus, field verification by professional biologists of the absence or presence of species and biological communities will always be an important obligation of users of our data.

If you are aware of observation datasets that the MTNHP is missing, please report them to the Program Botanist apipp@mt.gov or Senior Zoologist dbachen@mt.gov. If you have observations that you would like to contribute, you can submit animal observations using our online data entry system at http://mtnhp.org/AddObs/, plant and animal observations via Excel spreadsheets posted at http://mtnhp.org/observations.asp, or to the Program Botanist or Senior Zoologist.

Observations
The MTNHP manages information on more than 1.8 million animal and plant observations that have been reported by professional biologists and private citizens from across Montana. The majority of these observations are submitted in digital format from standardized databases associated with research or monitoring efforts and spreadsheets of incidental observations submitted by professional biologists and amateur naturalists. At a minimum, accepted observation records must contain a credible species identification (i.e. appropriate geographic range, date, and habitat and, if species are difficult to identify, a photograph and notes on key identifying features), a date or date range, observer name, locational information (ideally with latitude and longitude in decimal degrees), notes on numbers observed, and species behavior or habitat use (e.g., is the observation likely associated with reproduction). Bird records are also required to have information associated with date-appropriate breeding or overwintering status of the species observed. MTNHP reviews observation records to ensure that they are mapped correctly, occur within date ranges when the species is known to be present or detectable, occur within the known seasonal geographic range of the species, and occur in appropriate habitats. MTNHP also assigns each record a locational uncertainty value in meters to indicate the spatial precision associated with the record’s mapped coordinates. Only records with locational uncertainty values of 10,000 meters or less are included in environmental summary reports and number summaries are only provided for records with locational uncertainty values of 1,000 meters or less.
**Species Occurrences**

The MTNHP evaluates plant and animal observation records for species of higher conservation concern to determine whether they are worthy of inclusion in the Species Occurrence (SO) layer for use in environmental reviews; observations not worthy of inclusion in this layer include long distance dispersal events, migrants observed away from key migratory stopover habitats, and winter observations. An SO is a polygon depicting what is known about a species occupancy from direct observation with a defined level of locational uncertainty and any inference that can be made about adjacent habitat use from the latest peer-reviewed science. If an observation can be associated with a map feature that can be tracked (e.g., a wetland boundary for a wetland associated plant) then this polygon feature is used to represent the SO. Areas that can be inferred as probable occupied habitat based on direct observation of a species location and what is known about the foraging area or home range size of the species may be incorporated into the SO. Species Occurrences generally belong to one of the following categories:

**Plant Species Occurrences**

A documented location of a specimen collection or observed plant population. In some instances, adjacent, spatially separated clusters are considered subpopulations and are grouped as one occurrence (e.g., the subpopulations occur in ecologically similar habitats, and their spatial proximity likely allows them to interbreed). Tabular information for multiple observations at the same SO location is generally linked to a single polygon. Plant SO’s are only created for Species of Concern and Potential Species of Concern.

**Animal Species Occurrences**

The location of a verified observation or specimen record typically known or assumed to represent a breeding population or a portion of a breeding population. Animal SO’s are generally: (1) buffers of terrestrial point observations based on documented species’ home range sizes; (2) buffers of stream segments to encompass occupied streams and immediate adjacent riparian habitats; (3) polygonal features encompassing known or likely breeding populations (e.g., a wetland for some amphibians or a forested portion of a mountain range for some wide ranging carnivores); or (4) combinations of the above. Tabular information for multiple observations at the same SO location is generally linked to a single polygon. Species Occurrence polygons may encompass some unsuitable habitat in some instances in order to avoid heavy data processing associated with clipping out habitats that are readily assessed as unsuitable by the data user (e.g., a point buffer of a terrestrial species may overlap into a portion of a lake that is obviously inappropriate habitat for the species). Animal SO’s are only created for Species of Concern and Special Status Species (e.g., Bald Eagle).

**Other Occurrence Polygons**

These include significant biological features not included in the above categories, such as Important Animal Habitats like bird rookeries and bat roosts, and peatlands or other wetland and riparian communities that support diverse plant and animal communities.
**Geographic Range Polygons**

Geographic range polygons have not yet been defined for most plant species. Native year-round, summer, winter, migratory and historic geographic range polygons as well as polygons for introduced populations have been defined for most animal species for which there are enough observations, surveys, and knowledge of appropriate seasonal habitat use to define them (see examples to left). These native or introduced range polygons bound the extent of known or likely occupied habitats for non-migratory and relative sedentary species and the regular extent of known or likely occupied habitats for migratory and long-distance dispersing species; polygons may include unsuitable intervening habitats. For most species, a single polygon can represent the year-round or seasonal range, but breeding ranges of some colonial nesting water birds and some introduced species are represented more patchily when supported by data. Some ranges are mapped more broadly than actual distributions in order to be visible on statewide maps (e.g., fish).

**Predicted Suitable Habitat Models**

Recent predicted suitable habitat suitability models have not yet been created for most plant species. For animal species for which models have been completed, the environmental summary report includes simple, rule-based, associations with streams for fish and other aquatic species and mathematically complex Maximum Entropy models (Phillips et al. 2006, Ecological Modeling 190:231-259) constructed from a variety of statewide biotic and abiotic layers and presence only data for individual species contributed to Montana Natural Heritage Program databases for most terrestrial species. For the Maximum Entropy models, we reclassified 90 x 90-meter continuous model output into suitability classes (unsuitable, low, moderate, and optimal) then aggregated that into the one square mile hexagons used in the environmental summary report; this is the finest spatial scale we suggest using this information in management decisions and survey planning. Full model write ups for individual species that discuss model goals, inputs, outputs, and evaluation in much greater detail are posted on the MTNHP’s [Predicted Suitable Habitat Models](#) page. Evaluations of predictive accuracy and specific limitations are included with the metadata for models of individual species. **Model outputs should not be used in place of on-the-ground surveys for species. Instead model outputs should be used in conjunction with habitat evaluations to determine the need for on-the-ground surveys for species.** We suggest that the percentage of predicted optimal and moderate suitable habitat within the report area be used in conjunction with geographic range polygons and the percentage of commonly associated habitats to generate lists of potential species that may occupy broader landscapes for the purposes of landscape-level planning.

**Associated Habitats**

Within the boundary of the intersected hexagons, we provide the approximate percentage of commonly or occasionally associated habitat for vertebrate animal species that regularly breed, overwinter, or migrate through the state; a detailed list of commonly and occasionally associated habitats is provided in individual species accounts in the [Montana Field Guide](#). We assigned common or occasional use of each of the 82 ecological systems mapped in Montana by: (1) using personal knowledge and reviewing literature that
summarizes the breeding, overwintering, or migratory habitat requirements of each species; (2) evaluating structural characteristics and distribution of each ecological system relative to the species’ range and habitat requirements; (3) examining the observation records for each species in the state-wide point observation database associated with each ecological system; and (4) calculating the percentage of observations associated with each ecological system relative to the percent of Montana covered by each ecological system to get a measure of numbers of observations versus availability of habitat. Species that breed in Montana were only evaluated for breeding habitat use, species that only overwinter in Montana were only evaluated for overwintering habitat use, and species that only migrate through Montana were only evaluated for migratory habitat use. In general, species were listed as associated with an ecological system if structural characteristics of used habitat documented in the literature were present in the ecological system or large numbers of point observations were associated with the ecological system. However, species were not listed as associated with an ecological system if there was no support in the literature for use of structural characteristics in an ecological system, even if point observations were associated with that system. Common versus occasional association with an ecological system was assigned based on the degree to which the structural characteristics of an ecological system matched the preferred structural habitat characteristics for each species as represented in the scientific literature. The percentage of observations associated with each ecological system relative to the percent of Montana covered by each ecological system was also used to guide assignment of common versus occasional association.

We suggest that the percentage of commonly associated habitat within the report area be used in conjunction with geographic range polygons and the percentage of predicted optimal and moderate suitable habitat from predictive models to generate lists of potential species that may occupy broader landscapes for the purposes of landscape-level planning. Users of this information should be aware that land cover mapping accuracy is particularly problematic when the systems occur as small patches or where the land cover types have been altered over the past decade. Thus, particular caution should be used when using the associations in assessments of smaller areas (e.g., evaluations of public land survey sections).
Introduction to Land Cover

Land Use/Land Cover is one of 15 Montana Spatial Data Infrastructure framework layers considered vital for making statewide maps of Montana and understanding its geography. The layer records all Montana natural vegetation, land cover and land use, classified from satellite and aerial imagery, mapped at a scale of 1:100000, and interpreted with supporting ground-level data. The baseline map is adapted from the Northwest ReGAP (NWGAP) project land cover classification, which used 30m resolution multi-spectral Landsat imagery acquired between 1999 and 2001. Vegetation classes were drawn from the Ecological System Classification developed by NatureServe (Comer et al. 2003). The land cover classes were developed by Anderson et al. (1976). The NWGAP effort encompasses 12 map zones. Montana overlaps seven of these zones. The two NWGAP teams responsible for the initial land cover mapping effort in Montana were Sanborn and NWGAP at the University of Idaho. Both Sanborn and NWGAP employed a similar modeling approach in which Classification and Regression Tree (CART) models were applied to Landsat ETM+ scenes. The Spatial Analysis Lab within the Montana Natural Heritage Program was responsible for developing a seamless Montana land cover map with a consistent statewide legend from these two separate products. Additionally, the Montana land cover layer incorporates several other land cover and land use products (e.g., MSDI Structures and Transportation themes and the Montana Department of Revenue Final Land Unit classification) and reclassifications based on plot-level data and the latest NAIP imagery to improve accuracy and enhance the usability of the theme. Updates are done as partner support and funding allow, or when other MSDI datasets can be incorporated. Recent updates include fire perimeters and agricultural land use (annually), energy developments such as wind, oil and gas installations (2014), roads, structures and other impervious surfaces (various years): and local updates/improvements to specific ecological systems (e.g., central Montana grassland and sagebrush ecosystems). Current and previous versions of the Land Use/Land Cover layer with full metadata are available for download at the Montana State Library’s Geographic Information Clearinghouse.

Within the report area you have requested, land cover is summarized by acres of Level 1, Level 2, and Level 3 Ecological Systems.

Literature Cited
Introduction to Wetland and Riparian

Within the report area you have requested, wetland and riparian mapping is summarized by acres of each classification present. Summaries are only provided for modern MTNHP wetland and riparian mapping and not for outdated (NWI Legacy) or incomplete (NWI Scalable) mapping efforts; described here. MTNHP has made all three of these datasets and associated metadata available for separate download on the Montana Wetland and Riparian Framework MSDI download page.

Wetland and Riparian mapping is one of 15 Montana Spatial Data Infrastructure framework layers considered vital for making statewide maps of Montana and understanding its geography. The wetland and riparian framework layer consists of spatial data representing the extent, type, and approximate location of wetlands, riparian areas, and deepwater habitats in Montana.

Wetland and riparian mapping is completed through photointerpretation of 1-m resolution color infrared aerial imagery acquired from 2005 or later. A coding convention using letters and numbers is assigned to each mapped wetland. These letters and numbers describe the broad landscape context of the wetland, its vegetation type, its water regime, and the kind of alterations that may have occurred. Ancillary data layers such as topographic maps, digital elevation models, soils data, and other aerial imagery sources are also used to improve mapping accuracy. Wetland mapping follows the federal Wetland Mapping Standard and classifies wetlands according to the Cowardin classification system of the National Wetlands Inventory (NWI) (Cowardin et al. 1979, FGDC Wetlands Subcommittee 2013). Federal, State, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands differently than the NWI. Similar coding, based on U.S. Fish and Wildlife Service conventions, is applied to riparian areas (U.S. Fish and Wildlife Service 2009). These are mapped areas where vegetation composition and growth is influenced by nearby water bodies, but where soils, plant communities, and hydrology do not display true wetland characteristics. These data are intended for use in publications at a scale of 1:12,000 or smaller. Mapped wetland and riparian areas do not represent precise boundaries and digital wetland data cannot substitute for an on-site determination of jurisdictional wetlands.

A detailed overview, with examples, of both wetland and riparian classification systems and associated codes can be found at: http://mtnhp.org/help/MapViewer/WetRip_Classification.asp

Literature Cited
Introduction to Land Management

Within the report area you have requested, land management information is summarized by acres of federal, state, and local government lands, tribal reservation boundaries, private conservation lands, and federal, state, local, and private conservation easements. Acreage for “Owned”, “Tribal”, or “Easement” categories represents non-overlapping areas that may be totaled. However, “Other Boundaries” represents managed areas such as National Forest boundaries containing private inholdings and other mixed ownership which may cause boundaries to overlap (e.g. a wilderness area within a forest). Therefore, acres may not total in a straight-forward manner.

Because information on land stewardship is critical to effective land management, the Montana Natural Heritage Program (MTNHP) began compiling ownership and management data in 1997. The goal of the Montana Land Management Database is to manage a single, statewide digital data set that incorporates information from both public and private entities. The database assembles information on public lands, private conservation lands, and conservation easements held by state and federal agencies and land trusts and is updated on a regular basis. Since 2011, the Information Management group in the Montana State Library’s Digital Library Division has taken an increasingly active role in managing layers of the Montana Land Management Database in partnership with the MTNHP.

Public and private conservation land polygons are attributed with the name of the entity that owns it. The data are derived from the statewide Montana Cadastral Parcel layer. Conservation easement data shows land parcels on which a public agency or qualified land trust has placed a conservation easement in cooperation with the land owner. The dataset contains no information about ownership or status of the mineral estate. For questions about the dataset or to report errors, please contact the Montana Natural Heritage Program at (406) 444-5354 or mtnhp@mt.gov. You can download various components of the Land Management Database and view associated metadata at the Montana State Library’s GIS Data List at the following links:

Public Lands
Conservation Easements
Private Conservation Lands
Managed Areas

Map features in the Montana Land Management Database or summaries provided in this report are not intended as a legal depiction of public or private surface land ownership boundaries and should not be used in place of a survey conducted by a licensed land surveyor. Similarly, map features do not imply public access to any lands. The Montana Natural Heritage Program makes no representations or warranties whatsoever with respect to the accuracy or completeness of this data and assumes no responsibility for the suitability of the data for a particular purpose. The Montana Natural Heritage Program will not be liable for any damages incurred as a result of errors displayed here. Consumers of this information should review or consult the primary data and information sources to ascertain the viability of the information for their purposes.
Introduction to Invasive and Pest Species

Within the report area you have requested, separate summaries are provided for: Aquatic Invasive Species, Noxious Weeds, Agricultural Pests, and Forest Pests that have been documented or potentially occur there based on their known distribution in the state. Definitions for each of these invasive and pest species categories can be found on our Species Status Codes page.

Each of these summaries provides the following information when present for a species: (1) the number of observations of each species; (2) the geographic range polygons for each species, if developed, that the report area overlaps; (3) predicted relative habitat suitability classes that are present if a predicted suitable habitat model has been created; (4) the percent of the report area that is mapped as commonly associated or occasionally associated habitat as listed for each species in the Montana Field Guide; and (5) and links to species accounts in the Montana Field Guide. Details on each of these information categories are included under relevant section headers under the Introduction to Native Species above or are defined on our Species Status Codes page. In presenting this information, the Montana Natural Heritage Program (MTNHP) is working towards assisting the user with rapidly determining what invasive and pest species have been documented and what species are potentially present in the report area. We remind users that this information is likely incomplete as surveys to document introduced species are lacking in many areas of the state, information on introduced species has only been tracked relatively recently, the MTNHP’s staff and resources are restricted by declining budgets, and information is constantly being added and updated in our databases. Thus, field verification by professional biologists of the absence or presence of species will always be an important obligation of users of our data.

If you are aware of observation or survey datasets for invasive or pest species that the MTNHP is missing, please report them to the Program Coordinator bmaxell@mt.gov Program Botanist apipp@mt.gov or Senior Zoologist dbachen@mt.gov. If you have observations that you would like to contribute, you can submit animal observations using our online data entry system at http://mtnhp.org/AddObs/, plant and animal observations via Excel spreadsheets posted at http://mtnhp.org/observations.asp, or to the Program Botanist or Senior Zoologist.
Additional Information Resources

Home Page for Montana Natural Heritage Program (MTNHP)

MTNHP Staff Contact Information

Montana Field Guide

MTNHP Species of Concern Report - Animals and Plants

MTNHP Species Status Codes - Explanation

MTNHP Predicted Suitable Habitat Models (for select Animals and Plants)

MTNHP Request Information page

Montana Cadastral

Montana Code Annotated

Montana Department of Environmental Quality

Montana Fisheries Information System

Montana Fish, Wildlife, and Parks Subdivision Recommendations

Montana GIS Data Layers

Montana GIS Data Bundler

Montana Greater Sage-Grouse Project Submittal Site

Montana Ground Water Information Center

Montana Legislative Environmental Policy Office Publications
(Including Index of Environmental Permits required in Montana and Guide to the Montana Environmental Policy Act)

Montana Environmental Policy Act (MEPA)

MEPA Analysis Resource List

Laws, Treaties, Regulations, and Permits on Animals and Plants

Montana Spatial Data Infrastructure Layers

Montana State Historic Preservation Office Review and Compliance

Montana Water Information System

Montana Web Map Services

National Environmental Policy Act

U.S. Fish and Wildlife Service Information for Planning and Conservation (Section 7 Consultation)

Web Soil Survey Tool
BIOLOGICAL ASSESSMENT REPORT & CORRESPONDENCE / BIOLOGICAL EVALUATION
July 31, 2020

Diane Stilson
Federal Aviation Administration
2725 Skyway Drive, Suite 2
Helena, MT 59602-1213

Dear Ms. Stilson,

Thank you for your letter of July 20, 2020, requesting U.S. Fish and Wildlife Service (Service) review and consultation on the proposed Yellowstone Airport Terminal Improvements project. The Montana Department of Transportation—Aeronautics Division (MDT) owns and operates the Yellowstone Airport near West Yellowstone, Montana, in Gallatin County, and has initiated preparation of an Environmental Assessment for submission to the Federal Aviation Administration (FAA). We received the biological assessment (BA) on July 20, 2020, with your letter, via email from Deb Wambach at MDT. The consulting firm Morrison Maierle prepared a BA that analyzed the proposed action for effects on federally-listed threatened and endangered species, specifically, the threatened grizzly bear (Ursus arctos horribilis), Canada lynx (Lynx canadensis), and the proposed wolverine (Gulo gulo luscus). This letter addresses only project-related effects to listed species that may occur in the project vicinity in accordance with the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 et seq.), and does not address the overall environmental acceptability of the proposed actions.

According to the BA, the proposed project would demolish the existing airport terminal and generator buildings, construct a new terminal building, expand the concrete commercial parking pad, reconstruct and extend the airport access road, construct new parking lot infrastructure, construct new water, sanitary sewer, and fiber optic infrastructure to serve the airport terminal area and the adjoining US Forest Service Jump Base, long-term maintenance of the new water and fiber optic infrastructure on National Forest System lands, and replace the existing airport beacon with a new beacon and tower.
We have reviewed the BA, and concur with your determination that the proposed project may affect, not likely to adversely affect the threatened grizzly bear and Canada lynx. We also acknowledge your determination that the proposed action will have no effect on the threatened Ute ladies' tresses \((Spiranthes diluvialis)\) and Canada lynx critical habitat. The Service also acknowledges your determination that the proposed action is not likely to jeopardize the continued existence of the proposed wolverine \((Gulo gulo luscus)\), and candidate whitebark pine \((Pinus albicaulis)\).

We based our conclusion on the information displayed in the BA, including conservation measures listed on pages 6-8 of the BA, that there is no reduction in grizzly bear secure habitat for the affected bear management unit, and on information in our records.

This concludes informal consultation pursuant to the regulations implementing section 7(a)(2) of the Act \((50 \text{ C.F.R. 402.13})\). This project should be re-analyzed: (1) if new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not considered in this consultation; (2) if the action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this consultation; or (3) if a new species is listed or critical habitat designated that may be affected by the action \((50 \text{ CFR 402.16})\).

We appreciate your efforts to ensure the conservation of threatened and endangered species as part of our joint responsibilities under the Act. If you have further questions related to this consultation or your responsibilities under the Act, please contact Mike McGrath at \((406) 449-5225\), extension 201, or at mike.mcgrath@fws.gov.

Sincerely,

[Signature]

for Jodi L. Bush
Office Supervisor

cc: Deb Wambach and Bill Semmens, Montana Department of Transportation, Helena, MT
July 20, 2020

Jodi Bush
U.S. Fish and Wildlife Service
Ecological Services
Montana Field Office
585 Shepard Way, Suite 1
Helena, Montana 59601

ATTN: Mike McGrath

Subject: Section 7 Consultation for Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, MT

Dear Ms. Bush:

The Montana Department of Transportation – Aeronautics Division (MDT) owns and operates the Yellowstone Airport (Airport) near West Yellowstone, Montana. MDT is proposing improvements at the Airport that would provide an updated and safe terminal building and associated improvements, and has initiated preparation of an Environmental Assessment (EA) for submission to the Federal Aviation Administration (FAA). As the Proposed Action would include improvements on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA.

As the lead federal agency in preparation of the EA, the FAA respectfully requests initiation of informal consultation under Section 7 of the Endangered Species Act for the Proposed Action, which generally includes the following elements:

- Demolition of existing airport terminal building and generator building,
- Construction of a new terminal building,
- Expansion of concrete commercial parking pad,
- Reconstruction and extension of airport access road,
- Construction of new parking lot infrastructure,
- Construction of new water, sanitary sewer, and fiber optic infrastructure to serve airport terminal area and adjoining USFS Jump Base,
  - Water, sewer, and fiber optic are included as the Proposed Action to be extended from the town of West Yellowstone. In the event that connection to town facilities is determined infeasible, options W1 and S1 are carried forward for analysis in the EA to provide onsite water and/or sewer alternatives.
- Replacement of existing airport beacon with new beacon and tower.
The purpose of the Proposed Action is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport administrative needs. As a result of implementing new terminal improvements, an ancillary purpose is to improve the water, sewer, and fiber optic infrastructure to better serve the new terminal, as well as be extended to facilitate existing and future airport uses and potentially the neighboring USFS Jump Base.

The action area for analysis varies by species in order to consider the potential effects on the species at the appropriate scale based on life history and habitat requirements. The action area for grizzly bear includes Madison Subunit 2 of the grizzly bear habitat. The action area for Canada lynx and wolverine includes the Madison Arm-Madison River sub-watershed. Wolverine were combined with Canada lynx due to there being no primary, maternal or dispersal habitat within 3.5 miles of the project activities. The action area for Ute ladies’ tresses and whitebark pine is defined by a more activity specific area including material trucking, construction, noise, light activity, dust, and physical ground disturbance.

Based upon the analysis provided in the Biological Assessment (BA), the FAA (in cooperation with the USFS and MDT) has determined that the Proposed Action will have no effect on Ute ladies’ tresses and critical habitat for Canada lynx. The project may affect, but is not likely to adversely affect grizzly bear and Canada lynx. The project is not likely to jeopardize the continued existence of whitebark pine and wolverine.

An electronic copy of the BA will be transmitted to your office on July 20, 2020 (today). Please review these findings and the BA and provide either your concurrence or non-concurrence on these determinations. You can provide your response, comments, or recommendations to me at diane.stilson@faa.gov. If you require additional information or if you have questions, I can also be reached by phone at (406) 441-5411.

Sincerely,

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

cc: (Via e-mail)
   Deb Wambach MDT – Environmental Service Bureau
   Jason Brey, District Ranger, U.S. Forest Service
   Jeff Kadlec, WYS Airport Manager
   Tim Conway, Administrator, Montana Aeronautics Division
   Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
   HLN ADO
   file
Biological Assessment:
Yellowstone Airport
Terminal Improvements Project

Prepared For

Yellowstone Airport
and
Montana Department of Transportation – Aeronautics Division

Prepared By

Morrison-Maierle, Inc.
2880 Technology Boulevard West
Bozeman, MT 59718

July 2020
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I. Introduction

A. Purpose

The purpose of this report is to assess the effects of the proposed action on federally listed threatened, endangered, candidate, and proposed species that have the potential to occur within the action area of the Yellowstone Airport Terminal Area Improvements Project.

The information contained herein will be utilized in preparing an Environmental Assessment (EA) to identify the potential environmental impacts associated with the proposed action, as well as how any identified impacts could be avoided, minimized, or mitigated. The EA is being prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) Regulations Title 40 CFR §§ 1500-1508, the implementing regulations for NEPA, 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 FAA is the lead agency for this EA.

As the proposed action would include improvements (and maintenance) on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA. Therefore, this document will aid to satisfy USFS Forest Service Manual (FSM) 1950 Environmental Policy and Procedures, the Forest Service Handbook (FSH) 1909.15 National Environmental Policy Act Handbook, and other legal requirements.

Since the State of Montana owns and operates the Yellowstone Airport, the proposed action is also subject to the Montana Environmental Policy Act (MEPA). Therefore, this document will aid to satisfy ARM 18.2.235 through 18.2.261 Rules Implementing the Montana Environmental Policy Act, as well as the Guide to the Montana Environmental Policy Act.

B. Proposed Action

The Montana Department of Transportation – Aeronautics Division (MDT – Aeronautics) owns and operates the Yellowstone Airport (also referred to by its FAA Airport Location Identifier “WYS” in this document) as the Sponsor for the airport and proposed improvements. The Sponsor seeks to implement an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal use needs based on Federal Aviation Administration (FAA) recommendations for such a facility. The need for such development was identified through several planning endeavors over the last several years to include the Master Plan and Airport Layout Plan (ALP) completed in 2015 and the Terminal Area Narrative Report (TANR) completed in 2019. The proposed improvements are based on those planning documents and are not intended nor anticipated to generate more flights or use of the airport in and of themselves. Improvements will support growth that is inherent to the continued use of the airport by commercial and general aviation traffic, largely tied to tourism associated with Yellowstone National Park, as well as the USFS Jump Base.

Proposed improvements are intended to replace and expand upon existing infrastructure. While the proposed terminal building will be a larger footprint than the existing building, it is meant to replace the existing facility that is proposed to be demolished once the new structure is operational. Paved access road and parking facilities are proposed to be extended to facilitate the new terminal location, as well as to replace existing short term, long term, and
rental car parking and washing pads that are a mixture of asphalt, asphalt millings, and native obsidian sand soil surfaces. While the airport is served by an existing well and sanitary sewer septic system, those systems are undersized for the present fire suppression needs, require arsenic treatment for potable water, and are currently exceeding Department of Environmental Quality (DEQ) and Gallatin County Health Department (GCHD) permitting limits for sewer effluent during peak periods. Extension of water and sewer utilities to tie into the town of West Yellowstone infrastructure will allow taking the existing systems offline while improving water quality, fire flows, and wastewater treatment. The proposed extension of subsurface fiber optic utilities from the town of West Yellowstone to the airport will replace weak existing wireless service at the airport.

An ancillary purpose of implementing new terminal improvements is to improve the water and sewer infrastructure to better serve the new terminal, as well as extend these utilities to facilitate existing and future airport uses and neighboring United States Forest Service (USFS) Jump Base. The proposed action includes:

- Demolition of existing airport terminal building and generator building,
- Construction of a new terminal building,
- Expansion of concrete commercial parking pad,
- Reconstruction and extension of airport access road,
- Construction of new parking lot infrastructure,
- Construction of new water, sanitary sewer, and fiber optic infrastructure to serve airport terminal area and adjoining USFS Jump Base,
- Maintenance of new water and fiber optic infrastructure on National Forest System (NFS) lands,
- Replacement of existing airport beacon with new beacon and tower.

II. Project Description

A. Project Elements
The proposed action includes a number of improvements at WYS. The proposed action would construct an approximate 29,000 square foot (SF) terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. Associated improvements will also provide an opportunity to improve the airport and the neighboring USFS Jump Base with upgraded water and sewer, as well as new fiber optic infrastructure. The following improvements are required to complete the proposed action, with major components identified on Figures 1 and 2 at the back of this report:

- New terminal building
  - Construct approximate 29,000 SF terminal with space for entry, lobby, seating, screening, passenger hold room, concessions, non-secure and secure area restrooms, airlines and ticketing, baggage drop/screening and handling/lobby, airport administration, Traffic Security Administration (TSA), rental cars, educational kiosks/display areas, mechanical systems and storage area(s), among other airport terminal related uses.
  - Demolish the existing airport terminal building and generator building
- Expand concrete commercial parking pad
- Reconstruct and extend airport access road
- Reconstruct the existing access road from HWY 191 to the area fronting the existing terminal building
- Extend the airport access road to the front of the new terminal building to facilitate access to proposed airport parking and the terminal
  - Construct new parking lot infrastructure
    - Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
    - Relocate existing car wash pad facilities for two resident rental car providers
  - New water infrastructure improvements
    - Extend water main infrastructure from the town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the airport. There will be a clearing width of approximately 30 feet, where necessary.
    - While USFS Jump Base site-specific water improvements are not proposed as part of the project, nor eligible for FAA funding assistance, the system is proposed to be sized to accommodate projected needs should the USFS desire to connect in the future. The water main is proposed to be routed to facilitate connection in the immediate vicinity of the USFS Jump Base.
    - Water improvements from the town are proposed to be looped to provide a continuous system versus a dead-end line to provide improved water and fire flow pressures and for redundancy in service.
    - An alternative that is being carried forward for analysis in the event that connection to town facilities is somehow determined be unfeasible is the establishment of an onsite water system (well, tank, arsenic removal system, distribution lines) that is identified as Alternative W1. Such improvements would be located on the airport property and considered for extension to serve the USFS Jump Base.
    - Occasional maintenance of the new water infrastructure improvements on NFS lands. This activity would be carried out under a special use authorization that will be issued to the State or Town (depending on final ownership of infrastructure) for the improvements and their operation and maintenance. It is expected that maintenance requiring motorized use on the utility corridor would be infrequent, and would generally address maintenance of the corridor, weed management, and maintenance of barriers that will prevent public motorized use of the utility corridor.
  - New sewer infrastructure improvements
    - Extend existing gravity sewer main from existing lift station near the Snow Removal Equipment (SRE) building and Fixed Based Operator (FBO) north to a proposed lift station located near the USFS Jump Base adjoining the airport. This lift station is proposed with this project as current grades and distances are such that gravity sewer alone is not able to facilitate connection to West Yellowstone sewer treatment facilities.
    - Extend a sewer force main from the proposed lift station south to the existing town of West Yellowstone sewer lagoons, located on the south end of the airport property.
    - While the USFS Jump Base sanitary sewer improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accept such effluent, should the USFS desire to connect in the future.
    - Most of the sewer infrastructure improvements will occur within the existing animal control fence. There will be approximately 200 feet outside of the fence at the south end before it ties into the existing lagoon.
• An alternative that is being carried forward for analysis in the event that connection to town facilities is somehow determined to be unfeasible is the establishment of an onsite Type 2 septic system with gravity and potential force main infrastructure that is identified as Alternative S1. Such improvements would be located on the airport property and considered for extension to serve the USFS Jump Base.

➢ New fiber optic infrastructure improvements

• Extend fiber optic infrastructure (buried in conduit) from the town of West Yellowstone to the new terminal, existing terminal area structures (ARFF and SRE buildings and FBO), and USFS Jump Base adjoining the airport.
• Fiber optic is proposed to be collocated in the same trench as the water line from the town of West Yellowstone. In event that the designers determine it is best to offset the utilities, fiber optic can be trenched or plowed in adjacent to the water line alignment. There is no perceived need to disturb any areas outside of those already proposed to facilitate water main installation.
• Occasional maintenance of the new fiber optic infrastructure improvements on NFS lands. This activity would be carried out under a special use authorization that will be issued to the utility company for the improvements and their operation and maintenance. As fiber and water infrastructure improvements would be collocated, refer to the description of this activity under the water infrastructure section above.

➢ Timber clearing to facilitate subsurface utilities (i.e. water, sewer, and fiber optic)

• Timber clearing along the Madison Addition is anticipated to require the removal of up to a 30’ width of timber at the USFS / private property interface (on USFS property) along the west and north sides of the Madison Addition, as well as the from the existing jeep trail to the intersection of Bechler Avenue.
• In areas where infrastructure can be installed and reasonably allow timber to remain within the 30’ clearing limits, then such timber will be allowed to remain. Such determinations will be dependent on water main and fiber location in regards to timber location, timber density, and timber presence along the edges of the 30’ clearing. Along all other areas, it is anticipated that up to an additional 10’ perpendicular from existing corridors (jeep trail, airport access road, overhead power line, and Jump Base access road) will require timber removal.
• Below is the estimated acreage of timber clearing that will take place outside of the animal control fence, broken out by clearing location:
  ▪ Temporary (new) clearings bordering the Madison Addition (30’ width anticipated) – 4.13 acres
  ▪ Jeep Trail (10’ width anticipated) – 1.18 acres
  ▪ Airport Access Road (10’ width anticipated) – 0.63 acres
  ▪ Overhead Power Line (10’ width anticipated) – 0.26 acres
  ▪ Jump Base Access Road (10’ width anticipated) – 0.47 acres
• An estimated 5 acres of timber will be cleared within the existing animal control fence and will not impact currently available grizzly bear habitat. The majority of project activities will occur in or near previously disturbed areas (terminal area, apron, runway, animal control fence, overhead power lines, pilot camp ground, previous clear-cut to clear the airport property in the 1960’s, and Jump Base).
• With Alternatives W1 and S1 being able to be completed on airport property, the extent of tree clearing is less (approximately 15% as compared extension of utilities from Town) to facilitate installation of on-site infrastructure. Below is the estimated acreage of timber clearing that will take place within the confines of the airport property and animal control fence:
- Water tank / well to south of terminal – 1.0 acres (approximate 200’x200’ behind a timbered buffer from the airfield and terminal area).
- Water / sewer alignment extension to USFS Jump Base – 0.52 acres (widening of existing clearing along the inside of the animal control fence by approximately 20’).
- Sewer Level 2 septic system with drain field – 4.13 acres (approximate 300’x600’ for drain field and infrastructure behind a timbered buffer from the airfield).
- Replacement of the existing airport beacon with a new beacon and tower.

Those bulleted items noted above are what constitutes the proposed action for immediate near-term development. Such infrastructure will support existing airport uses, as well as accommodate inherent growth of the aviation needs for the near term. Additional infrastructure (i.e. parking lots to the north and south side of the terminal) is presented in Figure 2 (cross hatched areas) for planning purposes only, and represents what is anticipated to be needed to accommodate the forecast growth at the airport over the latter portion of the 20-year planning period. The actual size of improvement footprint(s), final locations, and project specific aspects of the terminal, parking lot, access road, and other improvements will be determined in the design phase of the project, following completion of the environmental analysis. Improvements are anticipated to be the same or very similar in size and layout as identified herein. Future actions not identified herein as a project element of the proposed action will be subject to National Environmental Policy Act (NEPA) and MEPA (Montana Environmental Policy Act) review and consulted on as appropriate in association with the development of those projects and in advance of any proposed project implementation.

B. Schedule
The majority of improvements (excluding demolition of existing buildings and any remaining punch list items) of the proposed action are anticipated to be completed between 2021 and 2023, pending completion of the environmental review process. Various portions of the proposed action improvements are proposed to be bid separately due to the diversity of work types, and would likely be funded under multiple FAA grants.

Construction activities are anticipated to begin at the earliest in the fall of 2021 with ground breaking on the new terminal and apron improvements. Construction of the terminal would extend into calendar year 2023, with new beacon installation, existing beacon relocation, parking lot, access road, water, sewer, and fiber optic improvements being completed by the fall of 2023. The exact timing of individual improvements will vary, depending on factors such as availability of funding, weather conditions, and scheduling around airport user and Town of West Yellowstone constraints. Final completion may not be until 2024 in order to have all facilities completed for use in anticipation of the spring commercial air service season (presently in May of each year). Demolition of the existing terminal and generator buildings would occur at a time following occupation of the new terminal building, currently anticipated for the fall of 2024. Table 1 reflects the anticipated earliest start and latest completion dates with calendar month windows of active construction reflected. All of the proposed action items are proposed to be constructed and completed between Fall of 2021 and Spring of 2024 as funding, weather, and construction phasing coordination facilitates. Maintenance of improvements on NFS lands is expected to occur infrequently under special use authorization (specified in Operations and Maintenance Plan, Weed Management Plan, and other permit requirements).
Table 1 – Anticipated Schedule of Improvements

<table>
<thead>
<tr>
<th>Improvement</th>
<th>Anticipated Start*</th>
<th>Anticipated Completion*</th>
<th>Anticipated Times of Active Construction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Terminal Building Construction</td>
<td>Fall 2021</td>
<td>Summer 2023</td>
<td>Potential for year-round activity</td>
</tr>
<tr>
<td>Expand Concrete Commercial Parking Pad</td>
<td>Summer 2022</td>
<td>Spring 2023</td>
<td>April - October</td>
</tr>
<tr>
<td>Replace Beacon</td>
<td>Fall 2021</td>
<td>Summer 2023</td>
<td>April - October</td>
</tr>
<tr>
<td>Access Road Rehabilitation</td>
<td>Fall 2021</td>
<td>Summer 2023</td>
<td>April - October</td>
</tr>
<tr>
<td>Access Road Extension and Parking Lot Construction</td>
<td>Fall 2021</td>
<td>Summer 2023</td>
<td>April - October</td>
</tr>
<tr>
<td>Water / Sewer / Fiber Optic Infrastructure</td>
<td>Fall 2021</td>
<td>Summer 2023</td>
<td>April - October</td>
</tr>
<tr>
<td>Car Wash Pads for Rental Cars</td>
<td>Summer 2022</td>
<td>Summer 2023</td>
<td>April - October</td>
</tr>
<tr>
<td>Terminal and Generator Buildings Demolition</td>
<td>Fall 2023</td>
<td>Spring 2024</td>
<td>April - October</td>
</tr>
</tbody>
</table>

*Anticipated ‘Start’ and ‘Completion’ dates reflect a window in which improvements are anticipated to be started/completed. Actual construction time may be much less for some improvements. Timing of actual construction will be dependent on weather, funding availability, and Contractor schedule amongst other variables.

C. Conservation Measures

Conservation measures will be incorporated into the design of this project. The new water infrastructure improvements would reduce issues with naturally occurring arsenic in the groundwater and resolve current issues with fire protection including lack of fire protection infrastructure for airport structures and limited water volume and inadequate pressure to resupply for aircraft fire response. The proposed water and fiber optic lines will be installed adjacent to existing developed areas (residential housing, jeep trail, airport, US Forest Service access roads, terminal area, and overhead power line corridor) which will reduce the amount of timber removal required thereby limiting further fragmentation of the forest habitat (Rocky Mountain Poor Site Lodgepole Pine Forest (MNHP 2019)) that exists between the airport and Highway 191/287. The new sewer system connection would eliminate on-going problems with the existing septic system such as exceeding capacity during peak use periods and increased effluent flows that the drain field may not effectively treat. Extension of fiber optic utilities will improve upon the current wireless facilities and connectivity and will be collocated in the trench for the water line, or located directly adjacent to the water line, in order to eliminate any additional disturbance beyond that already anticipated for the water line.

A number of conservation measures have been developed regionally in order to reduce potential conflicts with grizzly bears. While no specific conservation measures have been identified for the Canada lynx or the wolverine, it is thought that the grizzly bear conservation measures will also play a role in mitigating potential impacts to the Canada lynx and the wolverine. These conservation measures include the Custer Gallatin National Forest (CGNF) Food Storage Order (located in Appendix A), Montana Department of Transportation (MDT) Conservation Measures for Work in Grizzly Bear Habitat special provision (located in Appendix A), and the Town of West Yellowstone Grizzly Bear ordinances (located in Appendix A). The list below is a summary of those provisions, orders, and ordinances:
The CGNF Food Storage Order (01-14-11-00-02) will be followed for all activities on US Forest Service lands. The following measures will be implemented to meet the intent of the food storage order:

- Keep all areas in a neat condition; promptly clean up any project related spills, litter, garbage, etc.
- Keep all food and food-related items inside of a closed, hard-sided vehicle or special bear resistant container except when preparing or eating food.
- Store petroleum products, antifreeze, and personal items such as deodorants, toothpaste, soap and lotions in the same manner as food, as these products may attract bears.
- Deposit garbage and waste items in grizzly bear-resistant containers. Remove the accumulated garbage and waste from the project site daily and dispose of in accordance with all Tribal, Federal, State and local laws, regulations and ordinances.

Additional conservation measures will include:

- No overnight camping is allowed within the project vicinity, except in designated campgrounds, by any crew member or other personnel associated with this project.
- Perform construction activities during daylight hours only, typically between 6:00 am and 9:00 pm.
- Personal firearms are prohibited on the project site. The use of bear spray as necessary to deter bears is allowed.
- Notify the Project Manager of any animal carcasses found in the project area.
- Notify the Project Manager of any grizzly bears observed in the vicinity of the project.
- Notify the appropriate agency (FWP or USFS) for guidance related to carcasses or bears observed in the project area.

Conservation measures associated with reclamation and facility operation post-construction include:

- All disturbed ground will be re-seeded with an airport/USFS approved local weed-free seed-mix.
- All soil and seed will be from a certified weed free source.
- All garbage storage on the airport property will be maintained in bear-resistant trash containers.

Clearing of timber for the installation of the water lines will take place to the west, north, and east of the Madison Addition Subdivision in the town of West Yellowstone. These clearings are depicted on Figure 3 at the end of this report. Any new clearings created by the installation of water utility lines will be properly barricaded to prevent public motorized use. Barricades will comply with the 1998 Inter Agency Grizzly Bear Committee (IGBC) Guidelines and any recent court decisions. The specific type of system will likely be specified in any USFS special use authorization and final design will be reviewed at a future date. Barricades will prevent access to the public but will allow for periodic maintenance activities for the infrastructure improvements. The location of the proposed barricades are depicted on Figure 3 at the end of this report.
The majority of WYS (runway, apron, and taxiway) is surrounded by a 9-foot animal control fence (combination of high tensile and chain link), installed in 2007, which restricts access to larger wildlife (deer, elk, moose, bear, and bison) in order to reduce hazards to both aircraft and wildlife. Figures 1 and 3 (at the end of the report) depict the location of the 9-foot animal control fence. The animal control fence plays an important role in reducing or avoiding some potential project-related impacts to federally-listed species as these associated improvement actions will occur within the fence. No changes to the fence are proposed. Existing gates are closed on a continual basis and will remain so throughout the project. Temporary fence will be installed to maintain the integrity of the animal control fence and fence the airside from the new terminal construction throughout the project as well. Provisions for temporary fencing and requirements for the Contractor to maintain the fence integrity will be included within plans and specifications.

III. Action Area

A. General Geographic Area
The Yellowstone Airport is located two miles north of the town of West Yellowstone in southernmost Montana, just a few miles west of the Wyoming border and Yellowstone National Park’s western entry. It is the closest park entrance to Old Faithful and Yellowstone’s geyser areas. US Highway 191 connects West Yellowstone with Interstate 90 in Bozeman, 115 miles to the north. US Highway 20 connects West Yellowstone with Interstate 15 and Idaho Falls, 110 miles to the south. Salt Lake City is 320 road miles to the south.

West Yellowstone has a small resident population with approximately 4,000 people residing within a 45-minute drive. Area resident population increases significantly in the summer with the annual influx of second-home owners and seasonal employees. West Yellowstone provides lodging, tours and shopping for visitors to Yellowstone National Park and offers a base for a variety of recreational activities in the region. SkyWest, under an Essential Air Service (EAS) contract, provides scheduled passenger service to the area, with non-stop service to Salt Lake City. WYS lies in Sections 15, 16, 21, 22, 28, and 29 of Township 13 South, Range 5 East. The location of the airport in its local and regional setting is depicted on the map below.

B. Project Specific Area
The action area is depicted in Figure 4 located at the end of this report. The action area for this analysis varies by species in order to consider the potential effects on the species at the appropriate scale based on life history and habitat requirements. The action area for grizzly bear includes Madison Subunit 2 of the grizzly bear habitat. The action area for Canada lynx and wolverine includes the Madison Arm-Madison River sub-watershed. Wolverine were combined with Canada lynx due to there being no primary, maternal or dispersal habitat within 3.5 miles of the project activities. The action area for Ute ladies’ tresses and whitebark pine is defined by a more activity specific area including material trucking, construction, noise, light activity, dust, and physical ground disturbance.

The Madison Subunit 2 (grizzly bear) is 100,456 acres (157 square miles) and the Madison Arm-Madison River sub-watershed (Canada lynx and wolverine) is 47,938 acres (75 square miles). The Action Area for the Ute ladies’ tresses and whitebark pine is 2,258 acres. The project areas for the terminal area improvements are depicted on Figures 1 and 2 located at the back of this report. In the interest of analyzing potential impacts at the scale of the
individual animal of the species anticipated to occur in the action area, the project specific area will be divided in two sections: project activities occurring inside of the animal control fence and project activities occurring outside of the animal control fence:

**Project activities inside of the animal control fence:**
- Expand concrete commercial pad
- Sanitary sewer line installation (approximately 3 acres)
- Water line installation between the terminal area and USFS Jump Base (0.9 acres)
- Fiber optic installation along water line alignment between terminal area and USFS Jump Base (collocated with water installation).

**Project activities outside of the animal control fence:**
- Terminal facilities improvements (total area approximately 7.1 acres, but the majority of this area is already an active part of existing airport facilities; see Figure 2):
  - Demolition of existing terminal and generator buildings and construction of new terminal building
  - Construction of new parking lot infrastructure
  - Replacement of the existing beacon
- Reconstruction and extension of airport access road (0.63 acres)
- New waterlines to serve airport terminal and USFS Jump Base (6 acres)
- New fiber optic to serve airport terminal and USFS Jump Base (collocated with water installation)
- Connection of sanitary sewer line to existing lagoons (0.01 acre)

The terminal area improvements and the proposed sanitary sewer line will be located entirely on the airport property. The proposed water lines and fiber optic will largely be installed on USFS land and will, for the most part, run parallel or beneath existing jeep trails and established cleared and/or paved roadway and existing utility corridors within the forest. The utility alignments were reviewed with interested parties to arrive at a preferred location that reduces the level of new impacts this project would have to the USFS land. Figure 1 and Figure 3 depict the path of the proposed utility lines in relation to land use and ownership.

**C. Baseline Activity Levels**

The current Yellowstone Airport was dedicated in 1965 and phased construction of the airfield facilities began in 1967. Construction included a large timber clearing effort over the majority of airport property, an 8,400-foot x 150-foot paved runway, a 75-foot wide full parallel paved taxiway and the airport terminal building. The smokejumper base (USFS Jump Base) from a prior airport location in the area was moved to the new airport location. In the same time period, a paved aircraft parking apron and a paved access road (from Highway 191) were constructed. Since the initial construction cycle ended, a number of airport improvements have been completed over the years that represent the current facility.

All of the terminal area improvements will take place near the existing terminal area that has been used as such for more than 50 years. The water line will be installed along an existing jeep trail that generally parallels Highway 191 and via a proposed linear clearing behind existing homes (Madison Addition) in West Yellowstone which terminates near Iris Street on the west side of West Yellowstone. Fiber optic utilities will be extended from existing infrastructure in the Madison Addition along the water line routes to serve the terminal area and USFS Jump Base. The new sanitary sewer line will be largely installed within the bounds
of the 9-foot animal control fence. See Figure 1 and Figure 3 at the back of this report for details on the proposed utility line placement and terminal area layout.

IV. Species/Critical Habitat Considered

A. Federally Listed Species with Potential Presence

Threatened and Endangered (T&E) species include those species that have been federally-listed or are proposed for federal listing by the US Fish and Wildlife Service (USFWS) as threatened or endangered. According to the Endangered Species Act (ESA) of 1973, threatened species are defined as “any species which is likely to become endangered within the foreseeable future throughout all or a significant portion of its range,” and endangered species are defined as “any species which is in danger of extinction throughout all or a significant portion of its range.” Pursuant to Section 7 of the ESA, any action that is funded, authorized, or conducted by a federal agency must be reviewed for its effects on federally-listed species or designated critical habitat. The purpose of a BA is to evaluate the potential effects of the action on listed and proposed species and designated and proposed critical habitat and determine whether any such species or habitat are likely to be adversely affect the action (50CFS 402.12(a)).

The October 9, 2019 USFWS Montana County List of Threatened, Endangered, Proposed and Candidate Species currently lists Ute ladies’ tresses (*Spiranthes diluvialis*), Canada lynx (*Lynx canadensis*), grizzly bear (*Ursus arctos horribilis*), wolverine (*Gulo gulo luscus*), whitebark pine (*Pinus albicaulis*), and Canada lynx critical habitat as potentially occurring in Gallatin County (USFWS 2019). See the table below for summary.

<table>
<thead>
<tr>
<th>Common Name</th>
<th>Scientific Name</th>
<th>Status</th>
<th>Critical Habitat in Action Area</th>
<th>Potential to occur in Action Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ute ladies’ tresses</td>
<td><em>Spiranthes diluvialis</em></td>
<td>Threatened</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Canada lynx</td>
<td><em>Lynx canadensis</em></td>
<td>Threatened</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Canada lynx critical habitat</td>
<td>---</td>
<td>---</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Grizzly bear</td>
<td><em>Ursus arctos horribilis</em></td>
<td>Threatened</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Wolverine</td>
<td><em>Gulo gulo luscus</em></td>
<td>Proposed</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Whitebark pine</td>
<td><em>Pinus albicaulis</em></td>
<td>Candidate</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

B. Identified Species

Methods

To confirm the presence or absence of any protected species in or within the vicinity of the action area, information on T&E species potentially affected by this proposed project was requested of USFWS biologists, US Forest Service, and Montana Fish Wildlife and Parks (MFWP) biologists. A response was received from the USFWS on September 26, 2019. Additionally, species occurrence data was requested and received from Montana Natural
Heritage Program (MNHP). The US Forest Service and Montana Department of Transportation provided comments on draft versions of this Biological Assessment, which have been incorporated. Correspondence and data files are provided in Appendix B.

A reconnaissance-level on-site evaluation of the action area, as defined by areas noted in Figure 1 (located at the end of the report), was performed in September 2019 by Christine Pearcy (Environmental Scientist) to examine and accurately assess the property for the potential for occurrence of T&E species and/or their suitable habitat. For utility clearings, an area 100-feet in width, centered on the alignment(s), was reviewed. The reasoning for reviewing an increased width beyond the proposed maximum clearing width of 30’ was to offer flexibility in the actual line location along the corridors in consideration of the extent of required timber removal and proximity to residences and other existing infrastructure. The analysis included an evaluation of the potential impacts to federally listed species within the action area.

Results
The USFWS provided the following information in their September 26, 2019 response letter (located in Appendix B):

- No designated or proposed critical habitat exists within the proposed project area;
- Canada lynx and wolverine may use the area as rare transients.
- There are no documented Ute ladies’ tresses occurrences or suitable habitat in the action area defined above for the Ute ladies’ tresses.
- Whitebark pine habitat does not occur within the immediate project vicinity. Whitebark pine may occur in the action area of the grizzly bear, wolverine, and Canada lynx, but not in the smaller action area defined above for the whitebark pine.
- Grizzly bears may occasionally occur in the general action area.

Data received from the MNHP stated that grizzly bears and whitebark pine were known to occur within a 1.0- mile radius of the project area. This data is located in Appendix B.

The US Forest Service provided input on local habitat data including:

- Grizzly bear secure habitat. Grizzly bear secure habitat is a conservation strategy standard for grizzly bears in the Yellowstone ecosystem. The Gallatin Forest Plan was amended to include the secure habitat standard and application rules identified in the grizzly bear conservation strategy.
- Information regarding other disturbance-related measures, such as Total Motorized Access Route Density (TMARD) and Open Motorized Access Route Density (OMARD), and representative model results, that would provide additional information for assessing impacts of the project on grizzly bear. These measures are not standards in either the grizzly bear conservation strategy or the Forest Plan. The USFS is required to maintain certain OMARD and TMARD levels by the Biological Opinion (and associated terms and conditions) for the 2006 Gallatin National Forest Travel Plan in some grizzly bear subunits, including the Madison #2 (USFWS 2006).
- Information on US Forest Service projects that could potentially be occurring concurrently with proposed project activities.
Below is a brief analysis of the species not expected to occur within the project area based on data provided by the agencies noted above and an on-site investigation of the action area of potential effect defined above for these species.

**Ute Ladies’ Tresses**
Habitat characteristics for Ute ladies’ tresses include alkaline wetlands, swales, and old river meander channels. None of these habitat characteristics exist within the Ute ladies’ tresses action area, as defined in Figure 4. Additionally, the USFWS stated that there are no known populations of this plant within miles of the airport. It has been determined that the proposed project activities will have **no effect** on the Ute ladies’ tresses identified as a federally listed threatened species that occurs in Gallatin County, Montana because neither the species nor its habitat is found in the project area. Therefore, no further analysis of Ute ladies’ tresses is provided in this document.

**Canada Lynx Critical Habitat**
The action area, defined as the Madison Arm-Madison River sub-watershed, is not located within critical habitat for the Canada lynx, according to the Greater Yellowstone Unit 5 Habitat Map (USFWS 2014). The nearest designated Canada lynx critical habitat is located approximately 6 miles to the north and east of the Action Area. Based on the absence of project activities within federally designated critical habitat and that any effects of the proposed action would not extend the six miles to the nearest designated critical habitat for the Canada lynx, it has been determined that project activities will have **no effect** on critical habitat for the federally listed Canada lynx. Therefore, no further analysis of impacts to critical habitat is provided in this document.

**Whitebark Pine**
The whitebark pine primarily exists in sub-alpine terrain, which is not representative of the whitebark pine action area, as defined above and in Figure 4. Additionally, the USFWS stated that whitebark pine habitat does not exist within the project area and no whitebark pine was observed during the pedestrian survey of the action area. MNHP indicated that the whitebark pine occurs within 1-mile of the project area. Based on the absence of suitable habitat characteristics and the lack of observation of the species during field investigations of the action area, the occurrence of the whitebark pine within the action area is not expected. Whitebark pine will not be directly impacted by the proposed action. Any effects of the proposed action are not expected to indirectly affect individuals of this species documented within a mile of the action area. It has been determined that project activities are **not likely to jeopardize the continued existence of** the whitebark pine identified as a candidate species that occurs in Gallatin County, Montana because neither the species nor its habitat is found in smaller action area. If the whitebark pine becomes federally listed during the analysis of this report, the determination of **no effect** will be appropriate. Therefore, no further analysis of the whitebark pine is provided in this document.

V. **Effects Analysis**

After analysis of information on species of concern from MNHP and the review of data from regulatory agencies discussed above, it was concluded that the grizzly bear, Canada lynx, and wolverine may potentially be impacted by the proposed project. The following sections on these three species provides information that addresses: 1) species description; 2) status and distribution; 3) life history and habitat requirements; 4) reasons for decline; 5) environmental
baseline/occurrence in project area; 6) actions/impacts and cumulative effects; 7) recommended conservation and coordination measures; and 8) determination of effect.

Grizzly bear

Species Description
The grizzly bear is the largest carnivore in Montana (Foresman 2012). The grizzly bear has a distinctive rounded face with small rounded ears and a prominent nose. The facial profile is concave, and there is a noticeable hump above the shoulders. The claws of adult grizzlies are approximately four inches in length and are slightly curved (MNHP 2019). The color of grizzlies vary greatly, but in Montana the most prevalent coloration is medium to dark brown underfur, with brown legs, hump and underparts, and light to medium grizzling on the head, back, and a light patching behind the front legs (Foresman 2012). The size of grizzly bears is variable depending on the season, but the average adult is approximately 73 inches long, and the average weight for males is 441 pounds and 287 pounds for females. The grizzly bear is often confused with the more common black bear, but its distinct facial features, shoulder hump, and light colored tips of its fur make differentiation possible at close distances (Foresman 2012).

Status and Distribution
The grizzly bear is listed as threatened under the ESA with the USFWS, the US Forest Service, and the Bureau of Land Management. As of 2020, there were an estimated 728 grizzly bears in the greater Yellowstone ecosystem (YNP 2019). The USFWS removed the grizzly bear population in the Greater Yellowstone Ecosystem from the federal threatened species list in June 2017, but a court order had the bears placed back on the List in 2019. According to the Yellowstone National Park website, scientists and wildlife managers believe the grizzly population is thriving (YNP 2019). They are a State of Montana Species of Concern with a state rank of S2S3 and a global rank of G4 (MNHP 2019).

Grizzly bears historically inhabited parts of Eurasia and most of central and western North America as far south as Mexico. In North America, the grizzly bear range currently extends from Alaska across the Yukon and Northwest Territory through British Columbia and Alberta to parts of the northeastern US. Populations of grizzly bears occurring in the U.S. inhabit six distinct regions of Washington, Idaho, Montana, and Wyoming (Foresman 2012). Most individuals that occur in Montana live in four of the six identified recovery zones: the Northern Continental Divide in northwest Montana; the Greater Yellowstone in southwestern Montana, northwestern Wyoming and eastern Idaho; the Bitterroot in western Montana and northern Idaho; and Cabinet-Yaak in northwest Montana.

Life History and Habitat Requirements
Grizzly bears exhibit a life span of approximately 25 years or more if in captivity (MNHP 2019). Grizzly bears will breed every 2 to 3 years, with mating season occurring from May through July. Grizzly bears are polygamous and several males may fight over a female for breeding purposes. Anywhere from one to four cubs are born in the winter den (in Montana the average is 2.8) and weigh on average 1.1 pounds. The newborn cubs are helpless at birth and are nursed for the first 1.5 to 2.5 years, growing rapidly. The young will remain with their mother for the next two
winters, and usually achieve adult size in 4 to 6 years (MNHP 2019). Grizzly bears hibernate during denning in well-drained areas on slopes that receive heavy snowfall. The bears will stay up to 7 months in these dens, leaving the dens in March or April (Foresman 2012).

Grizzly bears are not truly migratory, but often exhibit discrete elevational movements from spring to fall following seasonal food source availability. Grizzly bears usually are present at lower elevations in the spring and at higher elevations in the late summer and into the winter, but this is highly dependent on the type of food sources available within a particular home range. Grizzly bears have large home ranges averaging 296.5 square miles for males and 48.23 square miles for females, documented in a study conducted in the Swan Mountains of Montana (MNHP 2019).

Historically, the grizzly bear was primarily a plains species that occurred in high densities throughout most of eastern Montana, but are currently restricted to more remote, forested areas. In Montana, grizzly bears utilize a wide variety of habitat types depending on seasons and local characteristics. These habitats include: meadows, seeps, riparian zones, mixed shrub fields, closed timber, open timber, side-hill parks, snow chutes, and alpine slab-rock (MNHP 2019). Movements of grizzly bears within their home range are primarily dependent on the availability of food sources. Food availability and human development/access dictate how grizzly bears use the landscape within their home range (Scarlett 2020). Den sites typically occur at higher elevations that have a slope of 28 to 35 degrees, with an aspect that maintains deep snow (Foresman 2012).

The Greater Yellowstone Ecosystem Recovery Zone spans portions of Montana, Idaho and Wyoming and includes 5 National Forests (Beaverhead-Deerlodge, Bridger-Teton, Caribou-Targhee, Custer-Gallatin, and Shoshone); all of Yellowstone National Park, the northern portion of Grand Teton National Park and small areas of Bureau of Land Management, State and private lands (USFWS 1993).

Grizzly bears are characterized as opportunistic and adaptable omnivores whose diet consists of greater than 50 percent vegetation. Grizzly bears have long claws for digging and exploiting vegetative food sources, an adaption that evolved as a result of their diet. Grizzly bears also feed on carrion, fish, large and small mammals, insects, fruit, grasses, bark, roots, mushrooms, and garbage. Whitebark pine seeds are an important dietary component for the grizzly bear (MNHP 2019).

**Reasons for Decline**
The primary reason for the decline of the grizzly bear in the lower 48 states is the loss of suitable habitat, habitat fragmentation, and extermination of grizzly bears by humans (USFWS 1993). Mortality causes within the Greater Yellowstone Ecosystem (GYE) Recovery Zone include: management removal, mistaken identity while hunting, car strike, and general human encroachment into habitat.

**Environmental Baseline/Occurrence in the Project Area**
The Yellowstone Airport Improvement Project area is located within the Greater Yellowstone Ecosystem Recovery Zone and is located within Bear Management Subunit (BMU) Madison #2. The Greater Yellowstone Ecosystem is considered a distinct population segment (USFWS 2020). Grizzly bears are relatively common in the early spring and sometimes during the late summer in the basin. Grizzly bears have been known to travel immediately adjacent to the airport fences in the spring and occasionally the late summer (Scarlett 2020).
Actions/Impacts and Cumulative Effects

Direct Effects

Short-term temporary

Construction activities for the new terminal building and parking facilities will all take place on existing airport property. Construction of the proposed sanitary sewer line will be largely within the 9-foot animal control fence. Construction of the proposed water line and fiber optic infrastructure will take place largely outside of the animal control fence but between the airport and US Highway 191, and will take place on/adjacent to established residential housing, jeep trail, airport, and US Forest Service access roads, terminal area, and overhead power line corridor. A short-term and temporary increase in traffic on the airport and USFS roads and jeep trail can be expected. Additionally, during construction, a temporary increase in the presence of humans and noise from construction equipment, as well as airport terminal operations, will be present. Increased human activity could result in temporary grizzly bear avoidance of or displacement from the area.

It is expected that grizzly bears are most likely to occur in the project area during spring green up and fall hyperphagia as they are passing between the forest service property and Yellowstone National Park. Bears typically move more at night near human development and will be less likely to occur near the airport and highway during periods of when the airport is the most active with tourists and during construction activities (spring through fall). Summer also coincides with the season that high quality habitat is available in the back country at higher elevations and away from human disturbance, which might result in fewer bears present in the action area during the most active construction season. Because of the increasing grizzly bear population in the Greater Yellowstone Ecosystem, grizzly bear could occur within the action area at any time during the year, outside of hibernation. This occurrence would be expected in association with foraging during the shoulder seasons and during dispersal or transient movements as they move to more suitable habitat away from human disturbance.

Indirect Effects

Indirect effects are defined as those effects that are caused by or will result from the proposed action and are later in time, but are still reasonably certain to occur [50 CFR §402.02]. After construction activities are completed, the airport will continue to operate just as it has been for the past 50 plus years. The utility lines (water/sewer/fiber optic) may require occasional maintenance work but will otherwise be subsurface and should not present any impact to grizzly bears that may occasionally use the area. Occasional motorized use of the water and fiber optic infrastructure corridor on NFS lands for maintenance would occur under a special use authorization.

As discussed above in Section I (B), proposed improvements are intended to replace and expand upon existing infrastructure. While the proposed terminal building will be a larger footprint than the existing building, it is meant to replace the existing facility that is proposed to be demolished once the new structure is operational. Paved access road and parking facilities are proposed to be extended to facilitate the new terminal location, as well as to replace existing short term, long term, and rental car parking and washing pads that are a mixture of asphalt, asphalt millings, and native obsidian sand soil surfaces. These improvement projects do not generate more flights or more airport use. Area growth is inherent and largely tied to Yellowstone National Park tourism. Long-term impacts are considered minor and would be associated with a bigger footprint of the terminal building and increased paved area in the terminal area. The project will not affect overall airport volume or capacity in comparison to baseline conditions.
While timber removal is proposed, it is anticipated to be kept to a minimum as existing open clearings will be used to the largest extent possible. It is estimated that approximately 10 acres of trees will need to be cleared along the edges of all existing clearings and routes for the installation of water lines and fiber optic infrastructure.

Below is the estimated acreage of timber clearing that will take place outside of the animal control fence, broken out by clearing location:

- Temporary (new) clearings bordering the Madison Addition (30’ width anticipated) – 4.13 acres
- Jeep Trail (10’ width anticipated) – 1.18 acres
- Airport Access Road (10’ width anticipated) – 0.63 acres
- Overhead Power Line (10’ width anticipated) – 0.26 acres
- Jump Base Access Road (10’ width anticipated) – 0.47 acres

An estimated 3 acres of timber will be cleared within the existing animal control fence and will not impact currently available grizzly bear habitat. The majority of project activities will occur in or near previously disturbed areas (terminal area, apron, runway, animal control fence, overhead power lines, pilot camp ground, previous clear-cut to clear the airport property in the 1960’s, and Jump Base). Large areas of undisturbed habitat, including Yellowstone National Park, are located adjacent to the project area.

An analysis of the habitat model ran by Randall Scarlett, West Zone Wildlife Biologist with the US Forest Service, indicated the following results:

- There is no secure grizzly habitat in the vicinity of the “temporary use routes” (clearings created or expanded for utility infrastructure and ongoing maintenance where frequent motorized use would occur during construction activities) used to access the proposed buried utility line(s), thus there would be no temporary effect to grizzly bear secure habitat. Once timber is cleared from any utility rights-of-way, it is proposed to maintain any utility routes clear of timber to allow routine maintenance. Any disturbed areas would be seeded with native grasses as coordinated with the USFS.
- The temporary use routes are surrounded by other routes classified as “open to motorized” routes. “Open to motorized” routes include Highway 191, the Airport Access Road, and the Jeep trail.
- There would be no temporary change in Open Motorized Access Route Density (OMARD) as it is a measure of the proportion of the subunits with route densities >1 mile/square mile for only those routes that are open to public motorized use. There would be no change in OMARD with regards to proposed project activities.
- The temporary use routes (clearings for utility installation) that would be used for the project would be closed to the public, and would therefore not affect OMARD. Barricades are proposed to be a series of boulders and/or Forest Service/Town of West Yellowstone approved gates. Barricades will prevent public motorized use but will allow for periodic maintenance activities of the utility corridor, consistent with the Forest grizzly bear direction (Gallatin Forest Plan page G-3).
- Total Motorized Access Route Density (TMARD) (proportion of the subunit with road densities >2 miles/square mile) would temporarily increase slightly (from 21.6025% to 21.6376%) in response to proposed project activities. After the temporary use routes (clearings) are barricaded to eliminate public and administrative use other than utility maintenance activity, TMARD would return to baseline conditions.
Clearing of vegetation to install utility lines will generally improve forage for grizzly bears by increasing herbaceous vegetation in the affected habitat area. However, timber removal is anticipated to be limited and due to the proximity of existing uses such as private residences, vehicle transportation corridors and airport activity, grizzly bear forage usage would be considered minimal.

Cumulative Effects
Cumulative effects are the combined impacts related to multiple activities or actions that occur over time.

Airport projects
In order to implement the Yellowstone Airport Terminal Improvements Plan Project, a new building will be constructed and the former terminal will be demolished. Additional projects include:

- Runway pavement maintenance (including seal coating and striping) in 2020.
- Precision Approach Path Indicator (PAPI) installation in 2021.

Potential development of non-aeronautical uses on the airport property: All non-aeronautical development will be separately evaluated under the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA). The aforementioned projects have received or will receive their own environmental analysis.

State-Funded Montana Department of Transportation Projects
On-going state-funded routine maintenance activities (plowing, pavement preservation, repairs, etc) will continue to occur over time. Timing for such activities is weather/use/condition dependent.

Gallatin County Projects
The Gallatin County Planning Department website was reviewed for upcoming projects that could be potentially taking place in the vicinity of West Yellowstone. No projects were noted to be occurring near West Yellowstone. Preparers of this report may not be aware of other actions taken or proposed in the foreseeable future by other local entities or private citizens in the action area.

West Yellowstone Projects
The Town of West Yellowstone publishes current Capital Improvement Plans on their government website. The 2018-2019 Capital Improvement Plan document was reviewed. There were some improvements listed for the Sewer System, such as constructing additional infiltration beds and replacing the sewer lagoon fence. These projects are listed for Fiscal Year 2019 and will likely be completed before the proposed project activities will be initiated. The Town of West Yellowstone is currently completing a water and sewer system facility plan that will identify needed improvements for the utilities for the Town. The Town recently (spring 2020) approved to move forward with design of a mechanical treatment plant and to downsize their lagoons. It is estimated that the design will take place in 2020 and construction is anticipated to take place between 2021 and 2022. Additionally, the US Forest Service just turned over 80 acres to the town of West Yellowstone for development. At this time, there are no identified projects due to limitations to local sewer treatment. A new development called Moonrise which has a conditional use permit is located in the northwest part of town. It is unknown
when this development will get underway. Preparers of this report may not be aware of other actions taken or proposed in the foreseeable future by other local entities or private citizens in the action area.

Cumulative Effects Conclusion
Several projects were identified as likely to occur within the larger action area of the proposed project. However, the projects identified span several years of various activities over a large action area. Grizzly bear activity in these identified areas is limited primarily to dispersal and transient uses as they move to more suitable habitat away from human disturbance. Construction activities may affect a grizzly bear that happens to move through an area during construction. This effect may result in a behavioral response in that the bear may move around the area due to the disturbance and human activity. Due to the level of existing human disturbance and development, as well as the marginal quality of the forested habitat near the airport, highway, and town of West Yellowstone as compared to more diverse and higher quality habitat available at higher elevations and further away from human disturbance, this area is not expected to provide ample resources critical for life history requirements. It is determined that due to the limited scope and footprint of these identified projects, and their occurrence in marginal quality dispersal habitat, any cumulative effects on grizzly bear are considered discountable and insignificant.

Recommended Conservation and Coordination Measures
Conservation measures for the proposed actions are proposed to avoid and minimize potential impacts to grizzly bears, and should consist of monitoring of the project area for the presence of the species prior to and throughout the duration of construction activities. To summarize, conservation measures will include adherence to all local, state, and federal food storage orders and work in grizzly bear area mitigation measures, as enumerated in Section II (C) above.

Removal of timber will take place to the west, north, and east of the Madison Addition Subdivision in the town of West Yellowstone. These new clearings are depicted on Figure 1 and 3 at the end of this report. Any new clearings created by the installation of water and fiber optic utility lines will be properly barricaded to prevent the public from using them as transportation routes, and would not be used for administrative use other than utility maintenance activities. Barricades are proposed to be a series of boulders and/or Forest Service/Town of West Yellowstone approved gates. Barricades will prevent access to the public but will allow for periodic maintenance activities of the utility lines. The location of the barricades are depicted on Figure 3 at the end of this report. Therefore, these new clearings are considered “temporary” access routes and not “open” access routes. This use is consistent with Forest Plan and conservation strategy guidance (Scarlett 2020).

Please refer to the Conservation Measures section above for a comprehensive list of all recommended conservation and coordination measures.

Determination of Effect
Dichotomous Key for Making ESA Determination of Effect (USFWS 1998)

1. Are there any proposed/listed animal species and/or proposed/designated critical habitat in the proposed project area?
   NO............................................................No Effect
   YES............................................................Go to 2
2. Will the proposed action(s) have “any effect whatsoever” on the species; designated or proposed critical habitat; seasonally or permanently occupied habitat; or unoccupied habitat necessary for the species survival or recovery?
NO……………………………………………..No Effect
YES……………………………………………Go to 3

3. Does the proposed action(s) have potential to: result in “take” of any proposed/listed animal species?
NO……………………………………………..Go to 4
YES……………………………………………Likely to adversely affect

4. Does the proposed action(s) have potential to cause an adverse effect to any proposed/listed animal species habitat, such as: adverse effects to critical habitat constituent elements or segments; impairing the suitability of seasonally or permanently occupied habitat; or impairing or degrading unoccupied habitat necessary for the survival or recovery of the species locally?
NO……………………………………………..Not likely to adversely affect
YES……………………………………………Likely to adversely affect

Based on the above information, implementation of recommended conservation measures, analyses of existing conditions and habitat requirements, and the Dichotomous Key for Determination of Effect, it is determined that implementation of the proposed project may affect, but is not likely to adversely affect the grizzly bear.

Rationale for Determination
The proposed project is not anticipated to adversely affect the grizzly bear for the following reasons:
- If grizzly bear(s) happen to be near the project area at time of commencement, construction activities may temporarily impact this species through noise, human activity, and operation of construction equipment.
- This noise and activity may result in a behavioral response in that the bear may move around the project area due to the disturbance of human activity.
- The project will not impact key components of grizzly bear habitat and will not constitute a barrier to grizzly bear movement in the permanent long-term condition.
- Due to the limited scope and footprint of the proposed action, any effects on grizzly bear are considered discountable and insignificant.

Canada Lynx

Species Description
Canada lynx is a medium-sized felid. Canada lynx are typically 22 pounds for the males and 17.5 pounds for the females with an average length of 36.5 inches for males and 35 inches for females. The color of the Canada lynx is yellowish-gray to grayish-brown with a white abdomen and throat. Their bodies are short and compact with long legs and a short tail with an entirely black tip. The back of the Canada lynx’ ears are darker than the body with a whitish spot in the center with long black tufts off the end. Canada lynx have a ruff surrounding their face except directly under the snout (Foresman 2012). Canada lynx have large, round, heavily furred feet that are highly adapted for deep snow (MNHP 2019).
The Canada lynx and the bobcat (*Lynx rufus*) are the only two medium-sized felids in Montana. From a distance the Canada lynx and the bobcat may be confused, but are discernible at closer range (Foresman 2012).

**Status and Distribution**

Canada lynx populations declined as a result of open season harvests with no bag limit in Montana and Idaho. The populations were so low that the harvest season for the Canada lynx closed in 1999 in Montana and 1997 in Idaho (Federal Register 2000). As of April 24, 2000, the Canada lynx are listed by the USFWS as a threatened species, and are a Montana species of concern with a global ranking of G5 and a state rank of S3 (Federal Register 2000, MNHP 2019).

The Canada lynx is distributed across northern North America from western Alaska to eastern Newfoundland. The distribution and abundance of lynx are closely associated with those of their primary prey species, the snowshoe hare (*Lepus americanus*), and populations cycle with those of the snowshoe hare (MNHP 2019). Both of these species are generally confined to northern forest environments.

**Life History and Habitat Requirements**

Canada lynx breed between February and April and give birth following an approximate 62- to 74-day gestation period (MNHP 2019). The litter size ranges from one to five kittens, and the kittens typically stay with the mother from 9 to 11 months of age (Foresman 2012). Adult females will produce one litter every 1 to 2 years and the young stay with the mother until the next mating season (MNHP 2019). Den sites tend to be in mature or old-growth stands with a high density of downed logs (MNHP 2019). Large woody debris such as downed logs and windfalls provide for den sites with security and thermal cover for kittens (USFWS 2000).

Canada lynx are typically non-migratory animals. However, Canada lynx are known to move large distances when prey becomes scarce. The Canada lynx home range size varies by the animal’s gender, abundance of prey, season, and the density of lynx populations (Federal Register 2000). Documented home ranges can vary from 3 to 300 square miles. When snowshoe hares are scarce, Canada lynx may abandon home ranges and wander in search of prey.

Canada lynx typically occur in mesic coniferous boreal, sub-boreal, and western montane forests that are subject to snowy winters and support a prey base of snowshoe hare (Ruediger et al. 2000). Canada lynx are most likely to occur in areas that receive deep snow, for which the lynx is highly adapted (Federal Register 2000). Snowshoe hares use forests with dense understories that provide cover from predators, forage, and protection during extreme weather conditions. Although earlier successional forest stages have greater understory structure and density, mature forests provide habitat for snowshoe hares when trees succumb to disease, fire, or insects. These events create large amounts of deadfall, and suitable habitat for snowshoe hares (Federal Register 2000).

The Canada lynx concentrate their hunting activities in habitats where the snowshoe hare activity is high. Most of the Canada lynx occurrences in the Northern Rocky Mountains are in the 4,920- to 6,560-foot elevation range (Federal Register 2000). Populations of Canada lynx in the western U.S. occupy habitat types consisting of logdepole pine, subalpine fir, Engelmann spruce, and quaking aspen. Other habitat types utilized by lynx include: Douglas fir, grand fir (*Abies grandis*), western larch (*Larix occidentalis*), and in extreme northwestern Montana and Idaho, western red cedar (*Thuja plicata*) and western hemlock (*Tsuga heterophylla*) (Ruediger et al. 2000).
The Canada lynx forage primarily on snowshoe hares, which comprise approximately 35 to 97 percent of their diet (MNHP 2019). Another important food source for lynx is the red squirrel (Sciurus vulgaris), which serves as a primary food source when snowshoe hare populations are reduced (MNHP 2019). Other food sources for lynx include: flying squirrels (Glaucomys spp.), ground squirrels (Spermophilus spp.), porcupines (Erethizon dorsatum), beavers, mice (Onychomys spp.), voles (Microtus spp.), shrews (Sorex spp.), blue grouse (Dendragapus obscurus), ruffed grouse (Bonasa umbellus), and ungulates as prey or carrion (Ruediger et al. 2000).

Lynx require contiguous habitat with ground and overhead cover for hunting and security (MNHP 2019). Lynx usually do not cross and tend to avoid large created or natural openings (Ruediger et al. 2000). In winter months, Lynx prefer to forage in spruce-fir forests with high horizontal cover, abundant hares, deep snow, and large-diameter trees. During the summer months, lynx also prefer high-horizontal cover, however switch to a higher density of smaller diameter tree that provide shade for rest-sites during the heat of the day (Squires et al. 2006). Lynx require either adjacent or contiguous habitat corridors for denning and foraging. Appropriate travel corridors consist of closed canopy regions greater than 6.5 feet in height that are interposed between foraging and denning habitats (Foresman 2012).

Reasons for Decline
In all regions within the range of Canada lynx in the contiguous United States, timber harvest, recreation, and their related activities are the predominant land use affecting lynx habitat. The primary factor that caused the Canada lynx to be listed was the lack of guidance for conservation of Canada lynx and snowshoe hare habitat in USFS National Forest Land and Resource Plans and BLM Land Use Plans given that a substantial amount of Canada lynx habitat in the contiguous United States is federally managed. This lack of guidance allowed the continued degradation of Canada lynx habitat on Federal lands through timber management and other Federal activities (Federal Register). Causes of mortality in Montana include human activities (trapping or shooting), predation, starvation, and unknown causes (Squires et al. 2006).

Environmental Baseline/Occurrence in Project Area
The area south of Interstate 90 in Gallatin County is considered “occupied habitat” by USFWS. The area that would be impacted by proposed project activities does not occur in a Lynx Analysis Unit (LAU) and does not provide appropriate vegetation conditions to provide suitable lynx habitat. The proposed project area is also not located within federally designated critical habitat (USFWS 2014). Comments received by the US Forest Service indicated that there have been documented sighting and trapping records in addition to a chance for lynx to pass through the proposed project area. Correspondence with the USFWS indicated that any Canada lynx within the proposed project area would be considered rare transients.

In 2007, the Forest Service completed the Northern Rockies Lynx Management Direction (NRLMD) Final Environmental Impact Statement (FEIS) (Forest Service 2007a). The NRLMD Record of Decision (ROD) (USDA Forest Service 2007b) amended the forests plans of 18 National Forests within the Rocky Mountain, Intermountain, and Northern Regions of the Forest Service, including the Gallatin National Forest, to add specific objectives, standards, and guidelines described in the NRLMD for management of lynx habitat. The decision states that “the management direction only applies to occupied lynx habitat.” (Forest Service 2007b, page 29). The portion of the Gallatin where the project would occur is considered occupied habitat; it is outside any LAU and no actual lynx habitat would be affected (none present due to
geology/vegetation conditions). NRLMD direction for all veg management (VEG), livestock (GRAZ), and human use (HU) projects apply to lynx habitat in lynx analysis units (LAUs) in occupied habitat, so they would not apply to the Action Area. The standards for linkage areas (LINK) apply to linkage areas in occupied habitat. There are no linkage areas at the action area.

**Actions/Impacts and Cumulative Effects**

**Direct Effects**

*Short-term temporary effects*

As the projects occurs near existing previously disturbed area (airport, jeep road, the town of West Yellowstone), key habitat components for Canada lynx do not occur in the affected project area. It is expected that Canada lynx could occur as rare transients in the project area as they move between more suitable habitat at higher elevations and appropriate forest composition. Noise from construction activities, coupled with on-going airport activities may elicit a behavioral response from Canada lynx, in that if moving through the project area during construction, the animal may move around the project area due to increased levels of disturbance and human activity.

**Indirect Effects**

Indirect effects are defined as those effects that are caused by or will result from the proposed action and are later in time, but are still reasonably certain to occur [50 CFR §402.02]. After construction activities are completed, the airport will continue to operate just as it has been for the past 50 plus years. The utility lines (water/sewer/fiber optic) may require occasional maintenance work but will otherwise be subsurface and should not present any impact to Canada lynx that may occasionally use the area. Occasional motorized use of the water and fiber optic infrastructure corridor on NFS lands for maintenance would occur under a special use authorization.

*Long-term permanent effects*

As discussed above in Section I (B), proposed improvements are intended to replace and expand upon existing infrastructure. While the proposed terminal building will be a larger footprint than the existing building, it is meant to replace the existing facility that is proposed to be demolished once the new structure is operational. Paved access road and parking facilities are proposed to be extended to facilitate the new terminal location, as well as to replace existing short term, long term, and rental car parking and washing pads that are a mixture of asphalt, asphalt millings, and native obsidian sand soil surfaces. These improvement projects do not generate more flights or more airport use. Area growth is inherent and largely tied to Yellowstone National Park tourism. Long-term impacts are considered minor and would be associated with a bigger footprint of the terminal building and increased paved area in the terminal area. The project will not affect overall airport volume or capacity.

The NRLMD ROD identifies the following risks to Canada lynx and Canada lynx habitat on federal lands (USDA Forest Service 2007b):

- Timber management
- Wildland fire management
- Livestock grazing
- Recreational uses
- Forest backcountry roads and trails
Cumulative Effects
Cumulative effects are the combined impacts related to multiple activities or actions that occur over time. Please refer to the Cumulative Effect Section within the grizzly bear analysis. Several projects were identified as likely to occur within the larger action area of the proposed project. However, the projects identified span several years of various activities over a large action area. It is determined that due to the limited scope and footprint of these identified projects, any effects on Canada lynx are considered discountable and insignificant.

Recommended Conservation and Coordination Measures
No specific conservation measures are recommended at this time with respect to the Canada lynx. While no specific conservation measures have been identified for the Canada lynx or the wolverine, it is thought that the grizzly bear conservation measures will also play a role in mitigating potential impacts to the Canada lynx and the wolverine.

Determination of Effect
Dichotomous Key for Making ESA Determination of Effect (USFWS 1998)

1. Are there any proposed/listed animal species and/or proposed/designated critical habitat in the proposed project area?
   NO……………………………………………..No Effect
   YES…………………………………………….Go to 2

2. Will the proposed action(s) have “any effect whatsoever” on the species; designated or proposed critical habitat; seasonally or permanently occupied habitat; or unoccupied habitat necessary for the species survival or recovery?
   NO……………………………………………..No Effect
   YES…………………………………………….Go to 3

3. Does the proposed action(s) have potential to: result in “take” of any proposed/listed animal species?
   NO……………………………………………..Go to 4
   YES……………………………………………..Likely to adversely affect

4. Does the proposed action(s) have potential to cause an adverse effect to any proposed/listed animal species habitat, such as: adverse effects to critical habitat constituent elements or segments; impairing the suitability of seasonally or permanently occupied habitat; or impairing or degrading unoccupied habitat necessary for the survival or recovery of the species locally?
   NO……………………………………………..Not likely to adversely affect
   YES……………………………………………..Likely to adversely affect

Based on the above information, implementation of recommended conservation measures, analyses of existing conditions and habitat requirements, and the Dichotomous Key for Determination of Effect, it is determined that implementation of the proposed project may affect, but is not likely to adversely affect the Canada lynx.

Rationale for Determination
The proposed project is not anticipated to adversely affect the Canada lynx for the following reasons:

- No suitable habitat exists in the action area.
Canada lynx critical habitat does not exist within the action area. The proposed project would not result in the alteration, degradation, or removal of potential Canada lynx habitat. The presence of nearby road infrastructure and airport activities likely restrict movements and existing levels of development and noise likely preclude usage of the immediate project area by Canada lynx. Construction activities would result in a temporary increase in noise levels; however, the short-term noise increase is not anticipated to reach levels that would harm Canada lynx. Construction activities may result a behavioral response from a Canada lynx, in that the animal may move around the project area due to the disturbance and human activity. The project will not impact key components of lynx habitat and should not constitute a barrier to lynx movement in the permanent long-term condition. The project is consistent with the Linkage (LINK) standard in the NRLMD. Due to the limited scope and footprint of the proposed action, any effects on Canada lynx are considered discountable and insignificant.

Wolverine

Species Description
The wolverine is the largest mustelid in Montana (Foresman 2012). Wolverines are similar to fishers, but are approximately twice as large (MNHP 2019). This species resembles a small bear and has a compact body, broad head, short neck and legs, and a bushy tail. Adult males range in size from 3 to 3.5 feet in length and can weigh between 15 and 70 pounds. Adult females are typically ten percent less in length and thirty percent less in weight (MNHP 2019).

Species Status and Distribution
In February 2013, the USFWS proposed listing the North American wolverine (Gulo gulo luscus) occurring in the contiguous U.S. as a threatened species under the ESA (78 FR 7864). The USFWS subsequently withdrew its proposed rule in August 2014 stating that the factors affecting the wolverine as identified in the proposed rule were not as significant as believed at the time of the proposed rule’s publication in 2013. As a result of court order, in April 2016, the USFWS withdrawal was vacated and the status of the wolverine was reverted to a proposed listing. On October 18, 2016, the USFWS issued a notice that the agency was reopening the comment period on the February 2013 proposed rule to list the wolverine as threatened.

The wolverine maintains a year-round residence in the western portion of Montana. Nationally, the wolverine occupies the northern and northwestern portions of Canada and all of Alaska (MNHP 2019). Montana and Idaho are the only states in the continental U.S. that are thought to have any significant populations of wolverines (Foresman 2012).

Life History and Habitat Requirements
The wolverine prefers a variety of coniferous montane forest types in Montana composed of scattered mature timber. Wolverines prefer rugged, roadless, and wilderness habitat conditions. Breeding season for the wolverines extends from June to August (MNHP 2019). Dens usually occur among rocks or tree roots, a hollow log, a fallen tree or in dense vegetation (MNHP 2019). The wolverines’ scavenging nature and requisite large home range preclude its ability to maintain a static territory (Foresman 2012). Wolverines live in low density populations: 15 per 1,000 square kilometers in northwestern Montana (Squires et al. 2007).
Wolverines are opportunistic feeders, consuming a wide variety of food such as roots, berries, small mammals, bird eggs, young fledglings, and fish. Food may be cached in the fork of tree branches or under the snow (MNHP 2019). Wolverines occur in relatively low densities and are solitary and wide ranging. Home ranges of males are larger than for females and can extend for several hundred square miles (MNHP 2019).

Preferred habitat for wolverine is limited to alpine tundra, and boreal and mountain forests (primarily coniferous) in the western mountains, especially large wilderness areas (MNHP 2019). Wolverines are typically found in areas with snow cover in the winter. Wolverines in northwestern Montana tend to occupy higher elevations in summer and lower elevations in winter. Researchers in Montana have reported habitat requirements of large, isolated tracts of wilderness with minimal to no roads that supports a diverse prey base (MNHP 2019).

**Reasons for Decline**
Over-harvesting by trappers in the early twentieth century is thought to be the main reason for decline in the wolverine. As of November 30, 2012, there was a temporary restraining order blocking wolverine trapping in Montana (Chaney 2012). A study conducted by Squires et al. (2007) concluded that trapping was the primary factor explaining decreased survival in western Montana, and that harvest pressure was capable of reducing populations beyond a sustainable level.

Additional reasons for the decline of wolverine numbers in U.S. are predominantly attributed to a reduction of habitat due to climate change; habitat impacts due to human use and disturbance; dispersed recreational activities; infrastructure development, including transportation corridors (USFWS 2013). The wolverine population in the contiguous U.S. is estimated at 250 to 300 individual wolverines, with the majority of them occurring in the northern Rocky Mountains (USFWS 2013).

**Environmental Baseline/Occurrence in Project Area**
Randall Scarlett, West Zone Wildlife Biologist with the US Forest Service, stated that wolverines have been known to pass through the general area. This includes a 2018 sighting near Rainbow Point Road and just east of West Yellowstone in Yellowstone National Park a few years ago. Mr. Scarlett states that there is potential that proposed project activities at the sites could disturb wolverine that may pass through the area even though there is no maternal or primary habitat in the immediate vicinity (Scarlett 2020).

**Actions/Impacts and Cumulative Effects**

**Direct Effects**
*Short-term temporary effects*
As the projects occur near existing previously disturbed area (airport, jeep road, the town of West Yellowstone), key habitat components for wolverine do not occur in the affected project area. It is expected that wolverine could occur as rare transients in the project area as they move between more suitable habitat at higher elevations and appropriate forest composition. Noise from construction activities and motorized use of the water and fiber optic utility corridor during installation, coupled with on-going airport activities may elicit a behavioral response from wolverine, in that if moving through the project area during construction, the animal may move around the project area due to increased levels of disturbance and human activity.
**Indirect Effects**
Indirect effects are defined as those effects that are caused by or will result from the proposed action and are later in time, but are still reasonably certain to occur [50 CFR §402.02]. After construction activities are completed, the airport will continue to operate just as it has been for the past 50 plus years. The utility lines (water/sewer/fiber optic) may require occasional maintenance work but will otherwise be subsurface and should not present any impact to wolverine that may occasionally use the area. Occasional motorized use of the water and fiber optic infrastructure corridor on NFS lands for maintenance would occur under a special use authorization.

**Long-term permanent effects**
Wolverine do not depend on any certain vegetation type or characteristics. There would be no effects on maternal or primary habitat. Additionally, there is no modeled dispersal habitat at the airport property. It is likely that the wolverine would adjust their movements to avoid disturbance in the vicinity of the airport (Scarlett 2020). This adjustment would be considered a behavior modification, and is not expected to result in harm to a dispersing wolverine. Mechanical treatment activities (timber removal with associated vehicle traffic), use of the existing road system, and other human activity in excess of background levels may result in disturbance to transient wolverine that may be passing through the area. However, these activities were determined to not be a threat to the species (USFWS 2013).

**Cumulative Effects**
Cumulative effects are the combined impacts related to multiple activities or actions that occur over time. Please refer to the Cumulative Effect Section within the grizzly bear analysis. Several projects were identified as likely to occur within the larger action area of the proposed project. However, the projects identified span several years of various activities over a large action area. It is determined that due to the limited scope and footprint of these identified projects, any effects on wolverine are considered discountable and insignificant.

**Recommended Conservation and Coordination Measures**
No specific conservation measures are recommended at this time with respect to the wolverine. While no specific conservation measures have been identified for the Canada lynx or the wolverine, it is thought that the grizzly bear conservation measures will also play a role in mitigating potential impacts to the Canada lynx and the wolverine.

**Determination of Effect**
It has been determined that the proposed project activities are not likely to jeopardize the continued existence of the wolverine identified as a species proposed for listing that occurs in Gallatin County, Montana because the species is unlikely to be found at or near the airport based on the lack of suitable habitat characteristics in the area. If the wolverine becomes federally listed during the analysis of this report, the determination of may affect but not likely to adversely affect will be appropriate.

**Rationale for Determination**
- No suitable habitat exists in the action area.
- The proposed project would not result in the alteration, degradation, or removal of potential wolverine habitat.
- The presence of nearby road infrastructure and airport activities likely restrict movements and existing levels of development and noise likely preclude usage of the immediate project area by wolverine.
• Construction activities would result in a temporary increase in noise levels; however, the short-term noise increase is not anticipated to reach levels that would harm wolverine.
• Construction activities may result in a behavioral response from wolverine, in that the animal may move around the project area due to the disturbance and human activity.
• The project will not impact key components of wolverine habitat and should not constitute a barrier to wolverine movement in the permanent long-term condition.
• Due to the limited scope and footprint of the proposed action, any effects on wolverines are considered discountable and insignificant.
NOTE:
1. FIBER OPTIC TO BE EXTENDED ALONG PORTIONS OF THE PROPOSED WATER MAIN ALIGNMENT FROM TOWN OF WEST YELLOWSTONE TO THE TERMINAL AREA AND USFS JUMP BASE.
2. WATER MAIN ALTERNATIVE FROM TOWN IS LOOPED TO PROVIDE IMPROVED WATER AND FIRE FLOW PRESSURE AND FOR REDUNDANCY IN SERVICE.

LEGEND

- SEWER MAIN / FORCE MAIN (PREFERRED ALTERNATIVE) - 12, 100 LF
- TYPE 2 SEPTIC SYSTEM (ALTERNATIVE S1)
- WATER MAIN (PREFERRED ALTERNATIVE) - 27,815 LF
- ON-SITE WATER TANK / DISTRIBUTION SYSTEM (ALTERNATIVE W1)
- ANIMAL CONTROL FENCE
- USFS FIRE CENTER AREA = 50.41 ACRES

AREA OF TIMBER CLEARANCE ADJOINING MADISON ADDITION (30' ANTICIPATED WIDTH FOR ~ 4.13 ACRES)
AREA OF TIMBER CLEARANCE ADJOINING EXISTING JEEP TRAIL ADDITION (10' ANTICIPATED WIDTH FOR ~ 1.18 ACRES)
AREA OF TIMBER CLEARANCE ADJOINING AIRPORT ACCESS ROAD (10' ANTICIPATED WIDTH FOR ~ 0.63 ACRES)
AREA OF TIMBER CLEARANCE ADJOINING OVERHEAD POWER LINE (10' ANTICIPATED WIDTH FOR ~ 0.26 ACRES)
AREA OF TIMBER CLEARANCE ADJOINING JUMP BASE ACCESS ROAD (10' ANTICIPATED WIDTH FOR ~ 0.47 ACRES)

THIS TIMBER LARGELY (90%) REMOVED WITH PRIOR PROJECT

ALTERNATE (W1) WELLWATER TANK/FIRE PUMP LOCATION SHOULD CONNECTION TO TOWN WATER FACILITIES NOT BE AVAILABLE
ALTERNATE (S1) TYPE 2 SEPTIC SYSTEM OR HIGHER LEVEL TREATMENT LOCATION SHOULD CONNECTION TO TOWN SEWER TREATMENT FACILITIES NOT BE AVAILABLE
VII. Literature Cited


Montana Natural Heritage Program (MNHP). 2019. Environmental Summary Report for Latitude 44.63426 to 44.73795 and Longitude -111.05627 to -111.17151. Retrieved on 10/2/2019


Scarlett, Randall (West Zone Wildlife Biologist, US Forest Service). 2020. Personal communication in the review of this Biological Assessment, emails and phone calls to Christine Pearcy (March and April 2020).


VIII. List of Contacts Made and Preparers

Agencies Contacted

Montana Department of Fish, Wildlife, and Parks
Region 3 Headquarters
Attn: Julie Cunningham, Wildlife Biologist
1400 South 19th Avenue
Bozeman, MT  59718

Montana Natural Heritage Program (contact was added 9/26 based on correspondence rcvd from Jodi Bush with U.S. Dept. of Interior Fish and Wildlife Service)
1515 East 6th Avenue
P.O. Box 201800
Helena, MT  59620-1800

U.S. Fish and Wildlife Service
Montana Ecological Services Field Office
Attn: Jodi Bush, Field Supervisor
585 Shepard Way
Helena, MT  59601

United States Department of Agriculture – Custer Gallatin National Forest
Supvisors Office
Attn: Mary Erickson, Forest Supervisor
P.O. Box 130
Bozeman, MT  59771

Yellowstone National Park
Attn: Cameron Sholly, Superintendent
P.O. Box 168
Yellowstone National Park, WY  82190

BA Preparers

Christine Pearcy, Environmental Scientist
Morrison-Maierle, Inc.

Travis Eickman, P.E., Senior Airport Engineer
Morrison-Maierle, Inc.

Randall Scarlett, West Zone Wildlife Biologist
US Forest Service
(Provided Gallatin Custer National Forest Service data and modeling results)

Deborah Wambach, Butte District Biologist
Montana Department of Transportation
(Reviewer)
Appendix A

Regionally Specific Data
CONSERVATION MEASURES FOR WORK IN GRIZZLY BEAR HABITAT

A. Description. This project is located within grizzly bear habitat; adhere to the following requirements:
   - Promptly clean up any project related spills, litter, garbage, debris, etc.
   - Camping is allowed in designated camping areas only.
   - Store all food, food related items, petroleum products, antifreeze, garbage, and personal hygiene items inside a closed, hard-sided vehicle or commercially manufactured bear resistant container.
   - Remove garbage from the project site daily and dispose of it in accordance with all applicable regulations.
   - Notify the Project Manager of any animal carcasses found in the area.
   - Notify the Project Manager of any bears observed in the vicinity of the project.

B. Perform all construction activity between the hours of 6:00 am and 9:00 pm. Nighttime traffic control is not subject to condition B.

C. Conduct all project-related activities outside of construction limits in a manner which will not adversely affect federally listed species and/or designated critical habitat. Such measures include but are not limited to those listed in A. above.

D. Method of Measurement and Basis of Payment. Work described in this provision is not measured for payment. Consider all costs associated with this provision incidental to performance of the work. Include the cost in the cost of other items.
Occupancy and Use Order # 01-14-11-00-02

United States Department of Agriculture
Forest Service
Custer Gallatin National Forest
Beartooth, Bozeman, Gardiner, Hebgen Lake, and Yellowstone Ranger Districts

OCCUPANCY AND USE RESTRICTIONS

Pursuant to Title 36 Code of Federal Regulations (CFR), 261.50 (a) and (b), the following acts are prohibited on the Beartooth, Bozeman, Gardiner, Hebgen Lake, and Yellowstone Ranger Districts of the Custer Gallatin National Forest. Definitions of terms used in support of the restrictions are also included as (Attachment A). The area affected is depicted on the attached map. (Attachment B) This Order is effective March 1 through December 1, annually, until rescinded.

1. Possessing or storing any food, refuse or other attractant, as specified in the Order (36 CFR 261.58 (c)).

2. Possessing, storing, or transporting any bird, fish, or other animal, or parts thereof, as specified in the Order (36 CFR 261.58 (s)).

3. Camping as specified in the Order (36 CFR 261.58 (e)).

UNDER THIS ORDER IT IS REQUIRED THAT

1. All food, refuse or other attractants must be acceptably stored or acceptably possessed during daytime hours.

2. All food, refuse or other attractants must be acceptably stored during nighttime hours, unless it is being prepared for eating, being eaten, being transported, or being prepared for acceptable storage.

3. Any harvested animal carcass must be acceptably stored, unless the carcass is being field dressed, transported, being prepared for eating, or being prepared for acceptable storage.

4. Camping or sleeping areas must be established at least ½ mile from a known animal carcass or at least 100 yards from a known acceptably stored animal carcass.

5. The responsible party shall report the death and location of livestock to a Forest Service official within 24 hours of discovery. Any Forest user finding dead livestock should contact the Forest Service.

6. Burnable attractants that cannot be completely consumed by fire (i.e., no post burning residue) must be packed out.
EXEMPTIONS
Pursuant to 36 CFR 261.50 (e) the following persons are exempt from this Order:

1. Persons with a permit issued by the Forest Supervisor specifically exempting them from this Order.
2. Any Federal or State officer placing baits to capture animals for research or management purposes as part of their official duties.

These restrictions are in addition to the general prohibitions in 36 CFR Part 261, Subpart A. This Order supersedes any previous Order prohibiting or restricting the same, or similar, acts in the above-described areas.

Done this day 19th of September, 2014.

[Signature]
MARY C. ERICKSON
Forest Supervisor
Custer Gallatin National Forests

Any violation of these prohibitions is punishable by a fine of not more than $5,000.00 for an individual or $10,000.00 for an organization, and/or imprisonment for not more than six (6) months, or both (Title 16 USC 551, Title 18 USC 3571 (b)(6), Title 18 USC 3581 (b)(7)).
1. “Food, refuse and other attractants” means any substance, solid or liquid or refuse (excluding water, baled hay, or hay cubes without additives), which is or may be eaten or otherwise taken into the body to sustain health or life, provide energy, or promote growth of any person or animal. Also includes items such as soft drinks, alcoholic beverages, canned foods, pet foods, processed livestock feed and grains, personal hygiene products, and empty food and beverage containers.

2. “Animal carcass” means the dead body or parts thereof, of any harvested mammal, bird, or fish, including the head or skull plate with antlers or horns and hide or cape of big game animals and any domestic livestock that may be found in the restricted area. Packaged or prepared animal carcass products transported into the restricted area for consumption, game birds, small mammals, or fish harvested for consumption in the restricted area are considered food under the previous definition.

3. “Burnable attractants” include items such as food leftovers, waste products, food grease or residue, food saturated containers or other substances that will not be completely consumed by fire. To be completely consumed, there must be no residual attractant on the surface or in the soil. These items shall not be buried, discarded or burned in an open campfire, unless placed in a suitable container (i.e. tin can or fire pan) to prevent leaching into the ground, and burned over an open campfire. Any remaining attractants unconsumed by burning shall be placed with other garbage, acceptably stored and packed out.

4. “Acceptably stored” means:
   a. Stored in bear-resistant container and/or utilizing a method listed on the most recent Interagency Grizzly Bear Committee Certified Bear Resistant Products List.
   b. Stored in a closed vehicle, trailer or container where the storage compartment is constructed of solid, non-pliable material that, when secured, will have no openings, hinges, lids, or coverings that would allow a bear to gain entry by breaking, bending, tearing, biting, or pulling with its claws (any windows in the vehicle must be closed), or
   c. Suspended at least 10 feet clear of the ground at all points and 4 feet horizontally from any supporting tree or pole, or
   d. Stored within a hard-sided residence, building, or storage container subject to the terms and conditions of a special-use authorization or operating plan, or
   e. Stored by other methods approved in a permit issued by the Forest Supervisor responsible for the area where the method is proposed for use.
   f. Animal carcasses must be acceptably stored (a. through e. above) when located 100 yards to ½ mile of a camping or sleeping area or within 200 yards of a Forest Road or Trail.
   g. Animal carcasses more that ½ mile from a camping area and more than 200 yards from a Forest Road or Trail may be left on the ground.
h. Animal carcasses killed or harvested (and parts thereof) within ½ mile of any established camping area or sleeping area must be acceptably stored, possessed, or moved to a distance beyond ½ mile from any such camp or sleeping area by the party(-ies) responsible for killing or harvesting such animal.

5. “Acceptably possessed” means:
   a. Possessed or attended during daytime by a person(s) that is physically present within 100 feet and direct sight of the accessible food, refuse or attractant or
   b. Possessed or attended by such a person(s) for the purpose of field dressing lawfully taken animal carcasses, transporting any food or animal carcass, preparing any animal carcass or food for eating, or eating any food.

6. “Camping/sleeping area” means National Forest System Lands temporarily used for the purpose of overnight occupancy without a permanently fixed structure or lands temporarily occupied by unattended camping equipment.

7. “Daytime” means ½ hour before sunrise to ½ hour after sunset, Mountain Time.

8. “Night time” means ½ hour after sunset to ½ hour before sunrise, Mountain Time.

9. “Forest Road or Trail” means a road or trail wholly or partly within, or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the National Forest System and the use and development of its resources.
Chapter 6.08
BEARS

Sections:
6.08.010 Definitions.
6.08.020 Feeding bears prohibited.
6.08.030 Disposal of garbage and refuse--Penalty.
6.08.040 Collection of garbage.
6.08.050 Location of nonbear-resistant containers.
6.08.060 Chief of police designated to schedule garbage pickup.
6.08.070 Violation--Penalties.

6.08.010 Definitions. For the purpose of this chapter:

A. "Food" means any food materials or attractants, attractive for bear use, such as human, livestock and pet foods, garbage and refuse, livestock carrion, game meat in the possession of man, other edibles and/or garbage which is allowed to accumulate, or the residue thereof.

B. "Unavailable" means hung out of reach or secured in a solid-sided bear-proof structure; or otherwise made unavailable through proper storage, handling and disposal. (Ord. 122 §4, 1987)

6.08.020 Feeding bears prohibited. It is unlawful for any person in the town to:

A. Feed any bear for any purpose whatsoever;

B. Harass any bear, including, but not limited to, approaching any bear by foot or vehicle, for any purpose, including photography;

C. Knowingly or purposely make any food of any kind available to bears in the town;

D. Negligently or otherwise make any food of any kind available to bears in the town. (Ord. 122 §1, 1987)

6.08.030 Disposal of garbage and refuse--Penalty.
A. All garbage, refuse, and any other food of any type whatsoever edible by bears shall be kept in bear-proof containers designed to make such containers resistant to entry by bears, or shall be otherwise made unavailable to bears, in the town. Violation of this section shall be punishable as a municipal infraction under Section 6.08.070.

B. The suitability of such refuse and food containers to meet the purposes of this section shall be approved by the chief of police. In this connection, the chief of police may, and shall whenever possible, for the purpose of determining such suitability, consult with and seek the advice of any other person or agency familiar with methods for minimizing human-bear confrontations and conflicts. (Ord. 207 §16, 2000: Ord. 122 §2, 1987)

6.08.040 Collection of garbage.
A. The chief of police and all other town officials shall cooperate in all reasonable respects with the West Yellowstone-Hebgen Basin Refuse Disposal District in implementing a system of collection containers for refuse that will incorporate the best design methods to make such containers resistant to entry by bears.

B. The chief of police and all other town officials are further empowered to undertake any appropriate activity to educate the public for the purpose of assisting in the securing of garbage receptacles and the like, in assisting in keeping areas free of food and garbage, and educating the public about securing all garbage during day or night time hours.

C. The town council is empowered to set the appropriate budget amount for overtime compensation to be used for extra patrol hours for the police department to patrol residential or commercial areas in the town to enforce this chapter. (Ord. 122 §3, 1987)

6.08.050 Location of nonbear-resistant containers.
All trash cans and other refuse disposal receptacles that are not of a bear-resistant design, whether located at residential or commercial facilities, shall be located inside the building served. (Ord. 122 §5, 1987)

6.08.060 Chief of police designated to schedule garbage pickup.
The town council empowers the chief of police to, in his discretion, require the garbage pickup by any commercial garbage collector under contract with the town to schedule garbage pickup to prevent overflow of cans and other containers so as to leave as little garbage as possible available to bears overnight. (Ord. 122 §6, 1987)

6.08.070 Violation--Penalties.
Violation of this chapter is a municipal infraction subject to the provisions of Sections 7-1-4150 through 7-1-4152, MCA. (Ord. 207 §17, 2000: Ord. 122 §7, 1987)
Appendix B

Correspondence
Travis Eickman, P.E.
Morrison-Maierle, Inc.
2880 Technology Blvd. West
Bozeman, MT  59718

Dear Mr. Eickman:

Thank you for your letter of August 29, 2019 requesting U.S. Fish and Wildlife Service (Service) comment regarding proposed improvements to the terminal area of the Yellowstone Airport located at 721 Airport Road in West Yellowstone, Gallatin County, Montana and the associated preparation of an Environmental Assessment (EA). The project proposes to replace the existing 12,000 square foot terminal with a new terminal facility encompassing approximately 29,000 square feet. Ancillary improvements proposed included access road and parking, new airport beacon, apron improvements, and water and sewer improvements. Additionally, the Town of West Yellowstone municipal water and sewer services would be extended to accommodate the airport buildings, which are currently serviced by a well and septic system. Our comments are prepared under the authority of, and in accordance with, the provisions of the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.), Bald and Golden Eagle Protection Act (16 U.S.C. 668d, 54 Stat. 250), and the Endangered Species Act (16 U.S.C. 1531 et. seq.).

**Threatened and Endangered Species**

Listed and proposed and candidate threatened and endangered species that may be present in Gallatin County include the listed threatened Canada lynx, grizzly bear, and Ute ladies’-tresses; proposed wolverine; and candidate whitebark pine. No designated or proposed critical habitat occurs in the project area. The Canada lynx and wolverine may occur as rare transients in the general project area. We are not aware of documented Ute ladies’-tresses occurrences in the project vicinity, and no suitable habitat exists within several miles of the proposed project location. Whitebark pine habitat does not occur in the immediate project vicinity.

Grizzly bears may occasionally occur in the general project area, and to reduce the risk of human-grizzly bear conflicts related to this project, the Service advises implementation of the following (or similar) voluntary conservation measures as appropriate:

1. Promptly clean up any project related spills, litter, garbage, debris, etc.
2. Allow no overnight camping within the project vicinity, except in designated campgrounds, by any crew member or other personnel associated with this project.
3. Store all food, food related items, petroleum products, antifreeze, garbage, personal hygiene items, and other attractants inside a closed, hard-sided vehicle or commercially manufactured
bear resistant container.
4. Remove garbage from the project site daily and dispose of it in accordance with all applicable regulations.
5. Notify the Project Manager of any animal carcasses found in the area.
6. Notify the Project Manager of any grizzly bears observed in the vicinity of the project.

Bald and Golden Eagle Protection Act
The Service is not aware of active eagle nests within several miles of the proposed project site. We provide the following for your information, as currently unknown nests could occur in the project vicinity where suitable habitat exists, and nest surveys have not been conducted.

The bald eagle (Haliaeetus leucocephalus) and golden eagle (Aquila chrysaetos) are protected from a variety of harmful actions via take prohibitions in both the Migratory Bird Treaty Act1 (MBTA; 16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (BGEPA; 16 U.S.C. 668–668d). The BGEPA, enacted in 1940 and amended several times, prohibits take of bald eagles and golden eagles, including their parts, nests, young or eggs, except where otherwise permitted pursuant to federal regulations. Incidental take of eagles from actions such as electrocutions from power lines or wind turbine strikes are prohibited unless specifically authorized via an eagle incidental take permit from U.S. Fish and Wildlife Service (Service). BGEPA provides penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." BGEPA defines take to include the following actions: "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." The Service expanded this definition by regulation to include the term “destroy” to ensure that “take” also encompasses destruction of eagle nests. Also the Service defined the term disturb, which means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

The Service has developed guidance for the public regarding means to avoid take of bald and golden eagles:

- The 2007 National Bald Eagle Management Guidelines serve to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of BGEPA may apply. They provide conservation recommendations to help people avoid and/or minimize such impacts to bald eagles, particularly where they may constitute “disturbance,” which is prohibited by the BGEPA.

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1 On December 22, 2017, the Department of the Interior’s (DOI) Office of the Solicitor Memorandum M-37050 titled The Migratory Bird Treaty Act Does Not Prohibit Incidental Take https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf) concludes that the MBTA’s prohibitions on pursuing, hunting, taking, capturing, killing, or attempting to do the same apply only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs. The MBTA list of protected species includes bald and golden eagles, and the law has been an effective tool to pursue incidental take cases involving eagles. However, the primary law protecting eagles is the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S. Code § 668), since the bald eagle was delisted under the Endangered Species Act in 2007. Memorandum-37050 does not affect the ability of the Service to refer entities for prosecution that have violated the take prohibitions for eagles established by the BGEPA.

**Migratory Bird Treaty Act**
We have reviewed the provided information and determined that there could be potential effects to migratory birds. To the extent practicable, necessary vegetation clearing, grubbing, and filling construction activities should be scheduled so as to avoid and minimize impacts to nesting birds, if present in the project area(s). Active nests may not be purposefully removed. The Service has developed, and continues to revise and develop, general and industry-specific conservation measures for avoiding and minimizing impacts to birds (https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php). We recommend that the proposed project considers and incorporates these measures into project design, construction, and documentation as appropriate.

**Additional Guidance**
If wetlands will be affected by the project, the Service recommends keeping wetland disturbances to the minimum extent and duration possible, with as much occurring “in the dry” as possible. This would reduce impacts to aquatic species relative to disturbance and sediment inputs. We also again recommend that appropriate erosion and sediment control efforts and measures be implemented during and following construction to avoid introducing sediments or other contaminants to adjacent waters.

In addition to coordination with the Service, we recommend coordination with Montana Fish, Wildlife and Parks and the Montana Natural Heritage Program. These agencies may be able to provide updated, site-specific information regarding fish, wildlife, and sensitive plant resources occurring in the proposed project area. Contact information for these two agencies is below:

Montana Fish, Wildlife and Parks  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, Montana 59620-0701  
Phone: (406) 444-2535

Montana Natural Heritage Program  
1515 East 6th Avenue, Box 201800  
Helena, Montana 59620-1800  
Phone: (406) 444-5354

Thank you for the opportunity to comment on the proposed project. If you have further questions related to this correspondence, please do not hesitate to contact Karen Newlon at (406) 449-5225, extension 209 or karen_newlon@fws.gov.

Sincerely,

Jodi L. Bush  
Office Supervisor
The Montana Natural Heritage Program is a program of the Montana State Library’s Natural Resource Information System. It is operated as a special program under the Office of the Vice President for Research and Creative Scholarship at the University of Montana, Missoula.

The Montana Natural Heritage Program is part of NatureServe – a network of over 80 similar programs in states, provinces and nations throughout the Western Hemisphere, working to provide comprehensive status and distribution information for species and ecosystems.

Suggested Citation
Introduction to Environmental Summary Report

The Environmental Summary report for your area of interest consists of introductory and related materials in this PDF and an Excel workbook with worksheets summarizing information managed in the Montana Natural Heritage Program’s (MTNHP) databases for: (1) species occurrences; (2) other observed species without Species Occurrences; (3) other species potentially present based on their range, presence of associated habitats, or predictive distribution model output if available; (4) structured surveys (organized efforts following a protocol capable of detecting one or more species); (5) land cover mapped as ecological systems; (6) wetland and riparian mapping; (7) land management categories; and (8) biological reports associated with plant and animal observations. In order to do this in a consistent manner across Montana and allow for rapid delivery of summaries, we have intersected this information with a uniform grid of hexagons that have been used for planning efforts across the western United States (e.g. Western Association of Fish and Wildlife Agencies - Crucial Habitat Assessment Tool). Each hexagon is one square mile in area and approximately one kilometer in length on each side. Summary information for each data layer is then stored with each hexagon and those summaries are added up to an overall summary for the report area you have requested. Users should be aware that summaries do not correspond to the exact boundaries of the polygon they have specified, but instead are a summary across all hexagons intersected by the polygon they specified.

In presenting this information, MTNHP is working towards assisting the user with rapidly assessing the known or potential species and biological communities, land management categories, and biological reports associated with the report area. We remind users that this information is likely incomplete and may be inaccurate as surveys to document species are lacking in many areas of the state, species’ range polygons often include regions of unsuitable habitat, methods of predicting the presence of species or communities are constantly improving, and information is constantly being added and updated in our databases. Field verification by professional biologists of the absence or presence of species and biological communities in a report area will always be an important obligation of users of our data. Users are encouraged to only use this environmental summary report as a starting point for more in depth analyses and are encouraged to contact state, federal, and tribal resource management agencies for additional data or management guidelines relevant to your efforts. Please see the Appendix for introductory materials to each section of the report, additional information resources, and a list of relevant agency contacts.
Native Species

Filter by: MT_Status='Species of Concern', 'Special Status', 'Important Animal Habitat', 'Potential SOC'

Species Occurrences

- **F - Westslope Cutthroat Trout** (*Oncorhynchus clarkii lewisi*)
  - Species of Concern - Native Species
  - Global: GST4  State: S2  USFS: Sensitive - Known on Forests (BD, BRT, CG, HLC, KOOT, LOLO)
  - **BLM: SENSITIVE  FWP SWAP: SGCN2**
  - **Delineation Criteria**
    - Stream reaches and standing water bodies where the species presence has been confirmed through direct capture or where they are believed to be present based on the professional judgement of a fisheries biologist due to confirmed presence in adjacent areas. In order to reflect the importance of adjacent terrestrial habitats to survival, stream reaches are buffered 100 meters, standing water bodies greater than 1 acre are buffered 50 meters, and standing water bodies less than 1 acre are buffered 30 meters into the terrestrial habitat based on PACFISH/INFISH Riparian Conservation Area standards. (Last Updated: Mar 30, 2018)
  - **Predictive Models:** 13% Suitable (native range) (deductive)

- **A - Western Toad** (*Anaxyrus boreas*)
  - Species of Concern - Native Species
  - Global: G4  State: S2  USFS: Sensitive - Known on Forests (BD, BRT, CG, HLC, KOOT, LOLO)
  - **BLM: SENSITIVE  FWP SWAP: SGCN2**
  - **Delineation Criteria**
    - Standing water bodies or portions of large water bodies with confirmed evidence of reproduction (calling adults, eggs, larvae or new metamorphs) buffered by 100 meters in order to reflect importance of adjacent terrestrial habitats to survival of breeding adults and newly metamorphosed juveniles. (Last Updated: Sep 26, 2019)
  - **Predictive Models:** 77% Optimal (inductive), 23% Moderate (inductive)  **Associated Habitats:** 86% Common, 4% Occasional

- **V - Castilleja gracillima** (*Slender Indian Paintbrush*)
  - Species of Concern - Native Species
  - Global: G5T4  State: S2  BLM: Sensitive - Known on Forests (BD, BRT, CG, HLC, KOOT, LOLO)
  - **BLM: SENSITIVE  FWP SWAP: SGCN2**
  - **Delineation Criteria**
    - Stream reaches and standing water bodies where the species presence has been confirmed through direct capture or where they are believed to be present based on the professional judgement of a fisheries biologist due to confirmed presence in adjacent areas. In order to reflect the importance of adjacent terrestrial habitats to survival, stream reaches are buffered 100 meters, standing water bodies greater than 1 acre are buffered 50 meters, and standing water bodies less than 1 acre are buffered 30 meters into the terrestrial habitat based on PACFISH/INFISH Riparian Conservation Area standards. (Last Updated: Mar 30, 2018)
  - **Predictive Models:** 13% Suitable (native range) (deductive)
<table>
<thead>
<tr>
<th>View in Field Guide</th>
<th>View Predicted Models</th>
<th>View Associated Habitat</th>
<th>View Range Maps</th>
</tr>
</thead>
<tbody>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G3</td>
<td>State: S2</td>
<td></td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Individual occurrences are generally based upon a discretely mapped area provided by an observer and are not separated by any pre-defined distance. Individual clusters of plants mapped at fine spatial scales (separated by less than approximately 25-50 meters) may be grouped together into one occurrence if they are not separated by distinct areas of habitat or terrain features. Point observations are buffered to encompass any locational uncertainty associated with the observation. (Last Updated: Jun 14, 2019)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Predictive Models:</strong></td>
<td>M - Grizzly Bear <em>(Ursus arctos)</em></td>
<td>SOC</td>
<td>77% Low (inductive), 23% Moderate (inductive)</td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G4</td>
<td>State: S253</td>
<td>USFS: PS: LT; XN USFS: Threatened on Forests (BD, CG, HLC, KOOT, LOLO)</td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Species occurrence polygons represent the greatest extent of 1) Recovery Zone Boundaries, 2) Demographic Monitoring Areas, and 3) Current Known Distribution within Montana as defined in the 2018 Grizzly Bear Recovery Program annual report. This includes the Bitterroot Recovery Zone, which is not currently occupied by a resident population of Grizzly Bears. (Last Updated: Jul 05, 2019)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Predictive Models:</strong></td>
<td>M - Wolverine <em>(Gulo gulo)</em></td>
<td>SOC</td>
<td>100% Moderate (inductive)</td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G4</td>
<td>State: S5</td>
<td>USFS: Proposed on Forests (BD, BRT, CG, HLC, KOOT, LOLO)</td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Confirmed area of occupancy supported by recent (post-1980), nearby (within 10 kilometers) observations of adults or juveniles. Tracking regions were defined by areas of primary habitat and adjacent female dispersal habitat as modeled by Inman et al. (2013). These regions were buffered by 1 kilometer in order to link smaller areas and account for potential inaccuracies in independent variables used in the model. (Last Updated: Sep 03, 2014)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Predictive Models:</strong></td>
<td>B - Clark’s Nutcracker <em>(Nucifraga columbiana)</em></td>
<td>SOC</td>
<td>40% Moderate (inductive), 60% Low (inductive)</td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G5</td>
<td>State: S3</td>
<td>USFS: MBTA</td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Observations with direct evidence of breeding activity or indirect evidence of breeding activity between early March and mid-July within forested habitats containing Whitebark Pine (Pinus albicaulis), Limber Pine (Pinus flexilis), or Ponderosa Pine (Pinus ponderosa). Observations are buffered by a minimum distance of 1,000 meters in order to encompass the spring/summer breeding territory size reported for the species or the locational uncertainty of the observation to a maximum distance of 10,000 meters. (Last Updated: Sep 25, 2015)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Predictive Models:</strong></td>
<td>B - Black-backed Woodpecker <em>(Picoides arcticus)</em></td>
<td>SOC</td>
<td>13% Moderate (inductive), 43% Low (inductive)</td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G3</td>
<td>State: S3</td>
<td>FWP SWAP: SGCN3</td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Confirmed occurrence of roosting individuals) of adults or juveniles during the active season. Point observation location is buffered by a minimum distance of 1,000 meters in order to encompass the majority of home range sizes reported for the species and otherwise buffered by the locational uncertainty associated with the observation up to a maximum distance of 10,000 meters. (Last Updated: Apr 03, 2017)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Predictive Models:</strong></td>
<td>M - Hoary Bat <em>(Lasiurus cinereus)</em></td>
<td>SOC</td>
<td>100% Low (inductive)</td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G34</td>
<td>State: S3</td>
<td>FWP SWAP: SGCN3</td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Confirmed occurrence of roosting individuals) of adults or juveniles during the active season. Point observation location is buffered by a minimum distance of 1,000 meters in order to encompass the majority of home range sizes reported for the species and otherwise buffered by the locational uncertainty associated with the observation up to a maximum distance of 10,000 meters. (Last Updated: May 14, 2019)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Predictive Models:</strong></td>
<td>V - Pinus albicaulis <em>(Whitebark Pine)</em></td>
<td>SOC</td>
<td>70% Low (inductive)</td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G37</td>
<td>State: S3</td>
<td>USFS: Candidate on Forests (BD, BRT, CG, HLC, KOOT, LOLO)</td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Point or polygonal observations are buffered by a minimum distance of 400 meters in order to account for stands instead of individual trees and to a maximum distance of 2,000 meters in order to encompass locational uncertainty associated with some common data sources for this species. (Last Updated: Sep 17, 2019)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Predictive Models:</strong></td>
<td>M - Bison <em>(Bos bison)</em></td>
<td>SOC</td>
<td>1% Common</td>
</tr>
<tr>
<td>Species of Concern - Native Species</td>
<td>Global: G3</td>
<td>State: S3</td>
<td>BLM: SENSITIVE</td>
</tr>
<tr>
<td><strong>Delineation Criteria</strong></td>
<td>Low (inductive)</td>
<td><strong>Predictive Models:</strong></td>
<td>Not Available</td>
</tr>
</tbody>
</table>
Delineation Criteria
Managed areas where the species occurs for at least a portion of the year as a free ranging herd, including areas where they are heavily managed to prevent the spread of brucellosis to cattle through spatial and temporal separation of bison and cattle. (Last Updated: Mar 29, 2016)

Associated Habitats: 18% Common, 1% Occasional

Delineation Criteria
Individual occurrences are generally based upon a discretely mapped area provided by an observer and are not separated by any pre-defined distance. Individual clusters of plants mapped at fine spatial scales (separated by less than approximately 25-50 meters) may be grouped together into one occurrence if they are not separated by distinct areas of habitat or terrain features. Point observations are buffered to encompass any locational uncertainty associated with the observation. (Last Updated: Nov 29, 2018)

Delineation Criteria
Stream reaches where the species recent presence has been confirmed through detection of live individuals or recent shells. Detection locations are buffered up and downstream by 500 meters to encompass potential adjacent populations and occupied stream reaches separated by less than 2000 meters are combined into a single species occurrence. In order to reflect the importance of adjacent terrestrial habitats to survival, stream reaches are buffered 100 meters into the terrestrial habitat based on PACFISH/INFISH Riparian Conservation Area standards. (Last Updated: Oct 19, 2018)

Delineation Criteria
Individual occurrences are generally based upon a discretely mapped area provided by an observer and are not separated by any pre-defined distance. Individual clusters of plants mapped at fine spatial scales (separated by less than approximately 25-50 meters) may be grouped together into one occurrence if they are not separated by distinct areas of habitat or terrain features. Point observations are buffered to encompass any locational uncertainty associated with the observation. (Last Updated: Sep 06, 2017)

Delineation Criteria
Potential Species of Concern - Native Species

View in Field Guide
View Associated Habitat
View Range Maps

V - Viguiera multiflora (Many-flowered Viguiera) SOC
Species of Concern - Native Species
Global: G4 State: S2 FWP SWAP: SGCN2

I - Margaritifera falcata (Western Pearlshell) SOC
Species of Concern - Native Species
Global: G4G5 State: S2S3 MNPS: 3

V - Mimulus suksdorfii (Suksdorf Monkeyflower) PSOC
Species of Concern - Native Species
Global: G4 State: S3S4

View in Field Guide
View Range Maps

V - Mimulus nanus (Dwarf Purple Monkeyflower) SOC
Species of Concern - Native Species
Global: G5 State: S2 USFS: Sensitive - Known on Forests (BD, BRT, CG, HLC, KOOT, LOLO)

V - Mimulus suksdorfii (Suksdorf Monkeyflower) PSOC
Species of Concern - Native Species
Global: G5 State: S2S3 USFS: Sensitive - Known on Forests (BRT, CG) MNPS: 2

View in Field Guide
Potential Species of Concern - Native Species
Global: G4 State: S3S4
Here is what I was able to run. There is some sort of an issue with the model. The project run for the Madison #2 subunit is showing a slight decrease in secure when this is not possible, as there is no secure in the vicinity of the “temp” routes that I fed into the model (and they are surrounded by other routes classified as open to motorized use). I only fed in temp roads on USFS lands that were not associated with an existing route open to motorized use. I have attached the existing run (Mad_su2_Secure...) and the project (MadA2_su2_Secure...) run. Despite what this says, there would be no temporary effect to secure. Also attached are the runs for road density (TMARD and OMARD). There is definitely something haywire in the model, as the data for OMARD is not calculating for the project run…but regardless, there would be no temporary change in OMARD as it is a measure of the proportion of the subunit with route densities >1 mile/square mile for only those routes that are open to public motorized use (the temp roads that would be used for the project would be closed to the public, so no affect on OMARD). TMARD (proportion of subunit with road densities >2 miles per square mile…this measure includes roads open to any motrized use, so the temp project roads used for admin access would apply) would temporarily increase slightly (from 21.6025% to 21.6376%) in response to the project. TMARD numbers are located at the bottom of the page for the Road Density runs. The existing and project road density runs are attached. Not that it will affect this project, but I’m trying to get a GIS guru to figure out what is going on with the model. Also attaching a shapefile of the temp roads I fed into the model…Randy

Randall Scarlett
West Zone Wildlife Biologist
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Hebgen Lake and Bozeman Ranger Districts
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f: 406-823-6990
randall.scarlett@usda.gov
330 Gallatin Road
West Yellowstone, MT 59758
Yeah, I think I heard about that ruling.

Thanks for the help…sorry for the rush…

Christine

Got sidetracked...we got a District Court ruling for North Hebgen that was less than great so working to remedy the issues on a short timeline. I will run the model again this afternoon and get with you tomorrow morning if that works...Randy
Any luck yet?

Thanks,

Christine A. Pearcy
Environmental Scientist, Morrison-Maierle
406.922.6846 direct | 406.581.6543 mobile

---

Trying to track down a bug in the modeling results...for some reason it is showing a reduction in secure even though that isn’t possible. Randy

---

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West Yellowstone, MT 59758
www.fs.fed.us
Caring for the land and serving people
Perfect. Thank you.

Christine A. Pearcy
Environmental Scientist, Morrison-Maierle
406.922.6846 direct | 406.581.6543 mobile

From: Scarlett, Randall L -FS [mailto:randall.scarlett@usda.gov]
Sent: Thursday, March 26, 2020 10:19 AM
To: Christine A. Pearcy <cpearcy@m-m.net>
Subject: RE: Yellowstone Airport Biological Assessment - Follow-up

***This message originated from an External Source.*** Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Here is a quick jpeg of that area…Randy

Randall Scarlett
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t: 406-823-6990
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330 Gallatin Road
West Yellowstone, MT 59758
www.fs.fed.us
Caring for the land and serving people

From: Christine A. Pearcy <cpearcy@m-m.net>
Sent: Wednesday, March 25, 2020 1:23 PM
To: Scarlett, Randall L -FS <randall.scarlett@usda.gov>
Subject: RE: Yellowstone Airport Biological Assessment - Follow-up

Hi Randy,
Thanks for all of this. A phone call would be great. I can be reached by either number in my contact block below. Also, could you send over a PDF of the programmatic BA that discusses activities that could potentially impact wolverine? Much appreciated…

Hope to connect soon,
Christine

Christine A. Pearcy
Here are the answers to your questions:

1. Do you have technical guidance documents on how to analyze project related impacts in relation to:
   a. Total Motorized Access Route Density (TMARD) and OMARD? Yes…we have a guidance document for running secure, TMARD, and OMARD analyses (models) - There is a model that has been developed to run the analysis.
   b. “Grizzly bear secure habitat” – Is this a Forest Service designation? Do you have maps? This is a designation from the conservation strategy for grizzly bears in the Yellowstone ecosystem, and it has been amended to the Forest Plan for the Gallatin portion of the Forest. I can get you a map and a shapefile of existing secure for the Madison #2 if you would like.

2. Impacts to forage and cover: Should these be analyzed in relation to existing area of forage and cover within the Madison Subunit #2? Do you have existing/baseline numbers you can send me? Analyzing them with respect to what the project would result in...herbaceous forage would be created where forested cover (lodgepole) is removed (and where accessible – some of the activities would occur inside the airport fence). I have hiding cover numbers for three elk analysis units that overlap the Madison #2 Subunit, but I don’t think it would really be worth the extra time piecing this together when the final answer would be something along the lines of affecting 15 acres of 100,000 acres of hiding cover (>40% canopy cover) available.

3. Could you provide details/timeframes for the following projects:
   a. North Hebgen Currently in court, but could begin as early as summer/fall 2020, but more likely to be 2021...would last up to 5 years or so...
   b. South Plateau Probably looking at 2021 at the very earliest...I would suspect litigation will back this up a bit
   c. Rainbow Point Road Adding turning lanes and moving the existing parking area began last fall, and should be completed in 2020
   d. Cougar Creek Bridge Replacement More likely that this will be in the 2024 timeframe...

I am more than willing to run any models for you if needed. Give me a call and we can talk if you’d like. I am heading to lunch right now but should be back by noon or so. Randy
From: Christine A. Pearcy <cpearcy@m-m.net>
Sent: Monday, March 23, 2020 10:47 AM
To: Scarlett, Randall L -FS <randall.scarlett@usda.gov>
Cc: Travis J. Eickman <teickman@m-m.net>; Diane.Stilson@faa.gov; Brey, Jason D -FS <jason.brey@usda.gov>
Subject: Yellowstone Airport Biological Assessment - Follow-up

Hi Randall,

Thanks for your review and comment on the Yellowstone Airport Biological Assessment. I’ve reviewed your comments and have some follow-up questions. I’ll write them out in this email, but let me know if a phone call would work better.

1. Do you have technical guidance documents on how to analyze project related impacts in relation to:
   a. Total Motorized Access Route Density (TMARD) and OMARD?
   b. “Grizzly bear secure habitat” – Is this a Forest Service designation? Do you have maps?
2. Impacts to forage and cover: Should these be analyzed in relation to existing area of forage and cover within the Madison Subunit #2? Do you have existing/baseline numbers you can send me?
3. Could you provide details/timeframes for the following projects:
   a. North Hebgen
   b. South Plateau
   c. Rainbow Point Road
   d. Cougar Creek Bridge Replacement

As I work through the document, I’ll likely have additional questions, but this is a good starting point. I appreciate your assistance in making this a robust document.

Kindly,
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DOT SECTION 4(f) EVALUATION
This Department of Transportation Section 4(f) Evaluation (also referred to as a Section 303(c) Evaluation) is submitted for review pursuant to the following public law requirements: Section 102(2)(c) of the National Environmental Policy Act of 1969; 49 USC 47106; Section 303 of 49 USC Code, Subtitle I; Section 106 of the National Historic Preservation Act of 1966.

For Further Information:

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Yellowstone Airport DOT Section 4(f) Evaluation

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LIST OF ATTACHMENTS
3. Memorandum of Agreement (MOA) 2021
4. Programmatic Agreement (PA) 2021
1. **Introduction**

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

DOT Section 4(f): Prohibits the use of land of significance in publicly owned public parks, recreation areas, wildlife and waterfowl refuges, and land of a historic site for transportation projects unless the Administration determines that there are no feasible and prudent avoidance alternatives and that all possible planning to minimize harm has occurred.

*De minimis* impacts related to historic sites are defined as the determination of either “no adverse effect” or “no historic properties affected” in compliance with Section 106 of the National Historic Preservation Act. For publicly owned parks, recreation areas, and wildlife/waterfowl refuges, *de minimis* impacts are defined as those that do not “adversely affect the activities, features, and attributes” of the DOT Section 4(f) resource. *De minimis* impact determinations are based on the degree of impact after the inclusion of any measure(s) to minimize harm.

The Federal Aviation Administration (FAA) is considering actions (known as the Proposed Action and Alternative W1 and S1) requested by the Montana Department of Transportation (MDT) – Aeronautics Division to provide an updated and safe terminal building and associated improvements to meet existing and forecasted passenger and terminal user needs at the Yellowstone Airport (WYS or Airport). The Proposed Action and Alternatives W1 and S1 include the construction of a new terminal building and parking lot infrastructure; demolition of the existing terminal and generator building; expansion of a concrete commercial aircraft parking pad; reconstruction and extension of the airport access road; new water, sewer, and fiber optic infrastructure improvements; timber clearing to facilitate subsurface utilities; and replacement of the existing airport beacon with a new beacon and tower.

The Proposed Action provides new water, sewer, and fiber optic infrastructure improvements to be extended from services provided by the town of West Yellowstone. Extending water services and fiber optic from West Yellowstone will require crossing the Custer Gallatin National Forest. The extension of sewer services from West Yellowstone will remain on Airport property as the town sewer lagoons are located at the south end of Airport property. Alternative W1 provides an alternative to construct on-site water supply infrastructure. Alternative S1 provides an alternative to construct on-site sanitary sewer treatment system. Fiber optic will not be installed unless in conjunction with the water line installation from the town of West Yellowstone proposed under the Proposed Action. Alternatives are described in detail in **Section 3** of this evaluation.

This DOT Section 4(f) Evaluation (Evaluation) was prepared as an appendix (Appendix G) to the Environmental Assessment (EA). This Evaluation consists of the following sections:

1. Introduction – Provides the regulatory context for the Evaluation; provides a brief description of the Airport; and describes the Purpose and Need for the Proposed Action and Alternatives W1 and S1.
2. Identification of DOT Section 4(f) Resources – Examines the lands in the airport vicinity relative to DOT Section 4(f) and identifies those resources that the FAA determined to be potentially subject to DOT Section 4(f);
3. Alternative Analysis – Identifies possible alternatives to avoid or minimize impacts to Section 4(f) resources.
4. Coordination – Summarizes the efforts made to coordinate with agencies and parties owning DOT Section 4(f) lands on the potential effects of the proposed projects.
5. Finding – Provides the FAA DOT Section 4(f) Finding.

1.1 DOT Section 4(f) Feasible and Prudent Requirements

Programs or projects requiring the use of DOT Section 4(f) lands will not be approved by the FAA unless there is no prudent and feasible alternative to the use of such land, and such programs and projects include all possible planning to minimize harm resulting from the use. The term “feasible” refers to sound engineering principals (per FAA order 5050.4b Page 10-10), while the term "prudent" refers to rationale judgement. According to FAA Order 5050.4B, a project may be possible (feasible), but not prudent when one considers safety, policy, environmental, social, or economic consequences.

The following factors are to be used to decide if an alternative is prudent:
- Does it meet the project's Purpose and Need?
- Does it cause extraordinary safety or operational problems?
- Are there unique problems or truly unusual factors present with the alternative?
- Does it cause unacceptable and severe adverse social, economic, or environmental impacts?
- Does it cause extraordinary community disruptions?
- Does it cause additional construction, maintenance, or operational costs of an extraordinary magnitude?
- Does it result in accumulation of factors that collectively, rather than individually, have adverse impacts that present unique problems or reach extraordinary magnitudes?

The FAA must clearly explain why any alternative is rejected as not being prudent and feasible if the project results in the use of DOT Section 4(f) protected lands.

1.2 Airport Description and Surrounding Land Uses

WYS is located two miles north of the town of West Yellowstone in southernmost Montana, just a few miles west of the Wyoming border and Yellowstone National Park’s western entry. US Highway 191 provides access to the Airport, and connects West Yellowstone to Interstate 90 in Bozeman, Montana, 115 miles to the north. Idaho Falls, Idaho, and Interstate 15 lie 110 miles to the south via US Highway 20. Salt Lake City, Utah is 320 road miles to the south of West Yellowstone.

The location of the Airport in its local and regional setting is depicted in Figure 1-1.

With the FAA Reauthorization Act of 2018, WYS falls into the new seasonal airport category and is considered a non-hub primary airport. This designation is based on having at least 8,000 passenger boardings of scheduled air carrier service over fewer than 6-month service season.

The Airport is utilized for corporate business activity, aerial surveying, military exercises, search and rescue, emergency medical services, and public charters among others. Commercial service is provided through SkyWest Airlines, and is nearly exclusively comprised of visitors to
Yellowstone National Park (YNP). Aerial wildland firefighting also has a large presence at the Airport, which is a critical service in wildland fire response.

Figure 1-1: Location Map
Figure 1-2 reflects the major land uses that are at the Airport and in the vicinity. On Airport, the town of West Yellowstone maintains their sewage lagoons under a lease with the Airport at the south end of the property. Energy West leases a portion of the Airport property off the very north end, adjacent to Highway 191.

Land use immediately surrounding the Airport is completely Custer Gallatin National Forest. Neighboring land uses that are buffered by the Custer Gallatin National Forest include the National Park Service (Yellowstone National Park), as well as the town of West Yellowstone near the southern portion of Airport property.

1.3 Purpose and Need

The purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. As a result of implementing new terminal improvements, an ancillary purpose is to improve the water, sewer, and fiber optic infrastructure to better serve the new terminal, as well as the potential extension to facilitate existing and future airport uses and the neighboring United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base) if they chose to connect in the future. Such improvements and modifications must be made to comply with FAA design standards and recommended guidance as noted in the 2019 Terminal Area Narrative Report (2019 TANR).

The proposed improvements are needed because the 2019 TANR identified that the present terminal building and associated infrastructure is not configured or sized to adequately...
accommodate present day and projected future needs of the traveling public. Additionally, the beacon does not meet current standards and replacement parts for the beacon are prohibitively expensive and difficult to find. The tower portion of the beacon requires staff to climb to the top to address maintenance or keep birds from nesting, which presents a safety concern to staff. The Proposed Action and Alternatives W1 and S1 would improve safety and efficiently accommodate the needs of existing and future passengers, TSA, Airport Administration, and other Airport users.

2. Identification of DOT Section 4(f) Resources

DOT Section 4(f) lands are defined as “any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance or land from an historic site of national, state, or local significance” (per 23 U.S.C. 138 Preservation of Parklands). To identify probable DOT Section 4(f) resources, local agencies were contacted, published recreation/refuge plans were reviewed, and a review of sites on or eligible for the National Register of Historic Place (NRHP) was conducted. Figure 1-2 shows the locations of the DOT Section 4(f) resources.

2.1 Parks/Recreational/Refuge Resources

Publicly owned land is considered to be a park, recreation area, or wildlife and waterfowl refuge when the land has been officially designated as such by a federal, state or local agency and one of its major purposes is for a park, recreation area, or wildlife and waterfowl refuge.

The following resources were identified and were found to be outside of the study area under the National Environmental Protection Act (NEPA) (which corresponds to the Area of Potential Effect (APE) under Section 106 of the National Historic Preservation Act) and will not be affected by improvements on Airport Property or the utility improvements for water and fiber optic being extended from West Yellowstone. Though DOT Section 4(f) resources, there is no direct use of these resources. As the proposed improvements do not change operations of the airport, including noise impacts, and cannot be visually seen from the identified resources, no constructive use would occur as a result of the Proposed Action and Alternatives W1 and S1 as the Proposed Action will not adversely affect the activities, features, and attributes that qualify these resources for protection under DOT Section 4(f) (see Section 3.1 for constructive use definition). As no uses would occur, no further discussion of these resources is required.

Baker’s Hole Campground – Located approximately 1.3 miles northeast of the Proposed Action (terminal) area and features a seasonal USFS campground open to tent and RV camping.

Pioneer Part (West Yellowstone Town Park) – Located approximately 1.75 miles southeast of the Proposed Action (terminal) area and features picnic shelters, restroom facilities, playground area, basketball court, softball diamond and area of scattered trees and open park for events.

Yellowstone National Park (YNP) – Located 0.8 miles west of the Proposed Action (terminal) area. This park is the first national park and contains significant wildlife, geologic, and native historical resources.

The following resource of publicly owned land was identified which is located inside the study area and thus requires further consideration:
Custer Gallatin National Forest (USFS) – Surrounds the entire Airport property. The area surrounding the airport is largely lodgepole pine forest that provides a mix of recreational opportunities.

2.2 Historic Sites

Sites and/or structures are defined as historically significant if they meet criteria for eligibility to the National Register of Historic Places (NRHP), maintained by the U.S. Department of Interior. Eligibility criteria are summarized as follows:

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

The identification of DOT Section 4(f) resources that may be historic in nature was conducted in accordance with Section 106 of the National Historic Preservation Act. For the Proposed Action, the Area of Potential Affect (APE) under Section 106 of the National Historic Preservation Act (Section 106) corresponds to the study area under NEPA.

To identify potential historic sites, the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019 per Section 106 (located in Appendix B of the EA). The CRI was conducted during the 2019 TANR for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. Two historic sites were identified and no cultural properties were identified in the CRI. These historic sites include the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), both of which were documented and recommended in the CRI as eligible to the NRHP and located on Figure 2-1.
The FAA contacted Tribes with historical ties to this area in letters dated August 29, 2019, in order to seek input on properties of cultural or religious significance that may be affected by the undertaking and to initiate Government-to-Government consultation. Eight Tribes were contacted, including the Blackfeet Nation, the Coeur d’Alene Tribe, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Kootenai Tribe of Idaho, the Nez Perce Tribe, and the Shoshone Bannock Tribes. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) to the project area.

An Addendum to the CRI (Addendum) was conducted per Section 106 in order to examine the routes of the potential extension of water, sewer, and fiber optic lines from the town of West Yellowstone, Montana, to WYS (Appendix B of the EA). It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the NPNHT. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural or historic resources, nor any sign of the Great Bannock Trail or NPNHT.

A brief summary of these DOT Section 4(f) historic resources that were identified under Section 106 is provided in Table 2-1 and additional detail can be found in the CRI and Addendum, located in Appendix B of the EA.
### Yellowstone Airport Terminal Building (24GA1958)

<table>
<thead>
<tr>
<th>Location: Within the APE</th>
<th>Status: Eligible to the NRHP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Table 2-1</strong>: Summary of DOT Section 4(f) Historic Resources</td>
<td></td>
</tr>
</tbody>
</table>

Yellowstone Airport

The terminal building is a simple vernacular architectural expression of western modernism with prevalent use of un-coursed ashlar stone fabric, large numbers of tall-banded vertical windows and brown stained rustic board and batten wood siding with functional interior space and conventional airport seating. The terminal is an approximate 11,000 square foot structure with main floor, partial second story mezzanine office area(s), and a partial basement with the remainder of the structure constructed on a slab-on-grade foundation.

The terminal is unique in its function among Mission 66 buildings at an airport and is an example that has not been significantly altered since its construction. While the interior has undergone significant remodeling at different times, most notably in response to the post 9-11 Traffic Security Administration (TSA) requirements, as well as to accommodate rental cars, helicopter tours, and Life Flight business within the building, and also in upstairs offices, the café, and modified bathroom facilities, much of the feel of the original Mission 66 style is evident in the lobby of the terminal. Outside of resurfacing the top of the roof, the exterior has undergone minimal alteration. The terminal building remains in its original use yet today. The terminal building is further referenced in Section 4.8 of the EA.

### Yellowstone Airport Beacon Tower (24GA1981)

<table>
<thead>
<tr>
<th>Location: Within the APE</th>
<th>Status: Eligible to the NRHP</th>
</tr>
</thead>
</table>

The beacon tower (photo provided below) was relocated to the airport grounds around the same time as the construction of the airport (circa late 1964 to 1965), and was possibly relocated from the old airport location immediately west of the Town of West Yellowstone. Historian information provided by the Montana Department of Transportation reflects that the tower is the same construction style as those constructed in the 1930s. While the beacon tower is likely of the original construction style as it was pre-relocation, the
rotating and lighted beacon equipment has gone through numerous changes as electrical equipment has expended its useful life.

![Yellowstone Airport Beacon](image)

The importance of beacons to rural navigation is illustrated by their numbers across Montana by mid-century. The improvement of radar and other navigational aids resulted in the decommissioning beacons nationwide beginning in 1951. In Montana, the assessment process began in the early 1960s. Many of these beacons were donated by the FAA to the Montana Aeronautics Commission, local governments, and other recipients for use. The eligibility of this beacon is based on its move to its present location within the period of significance, maintaining its value as a navigation tool for pilots across the state. The beacon is further referenced in Section 4.8 of the EA.

<table>
<thead>
<tr>
<th>The Great Bannock Trail</th>
<th>Location: North of the APE</th>
<th>Status: Does not have an Eligibility Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Great Bannock Trail (portions of which were also likely used by the Nez Perce in 1877 on what is known as the Nez Perce (Nee-Me-Poo) National Historic Trail) is known to have existed in the general area of the Proposed Action, although the exact location of the Great Bannock Trail is not known.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Great Bannock Trail was an aboriginal travel corridor approximately 200 miles in length stretching from the Camas Meadows in Idaho, across Targhee Pass and into the</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Madison River Valley, over the Gallatin Range and into the Gardiner River drainage, up the Yellowstone River and the Lamar River, to the Absaroka Mountains, and finally to the Clark Fork of the Yellowstone River and Shoshone River in Wyoming. Although named after the Bannocks of the Snake River Plains, the trail was used by several other tribes including the Flathead, Fort Hall and Wyoming Shoshoni, the Lemhi, and the Nez Perce along with early-day white explorers and trappers.

Use of the Great Bannock Trail has been suggested to have occurred for at least forty years—from approximately 1838 to 1878. Nez Perce Chief Joseph, along with approximately 750 followers, traveled portions of this route in 1877 while being pursued by U.S. Army General Oliver O. Howard. Less than a year later hostile Bannocks used the trail in 1878 in an attempt to reach hunting grounds in Wyoming. There are also records that individuals around the town of West Yellowstone drove cattle on the trail during the late 1890s and early 1900s. The Great Bannock Trail is further referenced in Section 4.8 of the EA.

The Nez Perce (Nee-Me-Poo) National Historic Trail

<table>
<thead>
<tr>
<th>Location: North of the APE</th>
<th>Status: Designated by Congress as a National Historic Trail in 1986</th>
</tr>
</thead>
</table>

The Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) extends approximately 1,170 miles on a circuitous route from the vicinity of Wallowa Lake, Oregon, to the Bear’s Paw Battlefield near Chinook, Montana. The location near the APE is identified in Figure 2-2.

It is named for the 1877 flight of the Nez Perce from their homelands while pursued by U.S. Army Generals Howard, Sturgis, and Miles (Nez Perce War of 1877). Chief Joseph, Chief Looking Glass, Chief White Bird, Chief Ollokot, Chief Lean Elk, and others led nearly 750 Nez Perce men, women, and children and twice that many horses over 1,170 miles through the mountains, on a trip that lasted from June to October of 1877. This route was used in its entirety only once; however, component trails and roads that made up the route bore generations of use prior to and after the 1877 flight of the nontreaty Nez Perce.

The Nez Perce passed through the Hebgen Basin (in which the Airport lies) in late August 1877. On August 9th, the military caught up with the Nez Perce at the Big Hole River in Montana. After a twenty-four-hour battle with heavy casualties on both sides, the Nez Perce moved rapidly from the Big Hole Battlefield through the upper Big Hole, south over Bannock Pass and re-entered Idaho. On August 20th, the Nez Perce and 260 men of the US Army clashed at Camas Meadows about thirty-six miles southwest of the current APE. The Nez Perce took the offensive and captured nearly all of the Army pack mules. This slowed the Army’s advance and allowed the Nez Perce to escape over Targhee Pass into Yellowstone country. They likely used portions of the Great Bannock Trail along their route in the area near the APE. The Nez Perce crossed into Yellowstone Park just to the east of the current APE.

Congress passed the National Trails System Act in 1968, establishing a framework for a nationwide system of scenic, recreational, and historic trails. The Nez Perce (Nee-Me-Poo) National Historic Trail was added to this system by Congress as a National Historic Trail in 1986. Nee-Me-Poo is the traditionally accepted name of the Nez Perce Tribe which means "The People". The Nez Perce National Historic Trail is further referenced in Section 4.8 of the EA.
Figure 2-2: Approximate Location of the Nez Perce (Nee-Me-Poo) National Historic Trail Near the APE as Designated by Dashed Line

For additional information on these historical resources please refer to Appendix B, and Section 4.8 of the EA.

3. Alternatives Analysis

This section describes the methodology used for determining impacts to DOT Section 4(f) resources and provides details on the alternatives considered including potential impacts. Methods to minimize or mitigate impacts to the identified preferred alternative are also included.

3.1 Methodology

Each DOT Section 4(f) resource was evaluated for potential impacts associated with each of the alternatives considered. The potential impact criteria evaluated for each site included direct impacts and constructive use impacts.
3.1.1 Direct Impacts/Physical Use

Direct impacts, or physical "use", refer to physical taking/acquisition of a DOT Section 4(f) resource for incorporation into a transportation project. In determining direct impacts, each proposed alternative was evaluated to determine if the alternative would impact one of the identified DOT Section 4(f) resources.

3.1.2 Indirect Impacts/Constructive Use

"Use" within the context of DOT Section 4(f) includes not only actual physical taking of such property, but also "constructive use." Constructive use occurs when the impacts of a project on a DOT Section 4(f) property are so severe that the activities, features, or attributes that qualify the property for protection under DOT Section 4(f) are substantially impaired. The definition of constructive use adopted for this study is based on Section 5.3.2 of the desk reference for FAA Order 1050.1F:

Substantial impairment occurs only when the protected activities, features, or attributes of the DOT Section 4(f) property that contribute to its significance or enjoyment are substantially diminished. This means that the value of the DOT Section 4(f) property, in terms of its prior significance and enjoyment, is substantially reduced or lost. For example, noise would need to be at levels high enough to have negative consequences of a substantial nature that amount to a taking of a park or portion of a park for transportation purposes.

3.2 Alternatives

As noted in Section 1.1.5 of the EA, the 2015 Master Plan and the 2019 TANR identified deficiencies in the existing terminal facilities at WYS and evaluated alternatives to address these deficiencies. The alternatives specific to the terminal included:

- Alternative 1: Rehabilitate terminal building in place
- Alternative 2: Construct new terminal building and repurpose the existing terminal
- Alternative 3: Construction of a new terminal building and demolition of the existing terminal

Each alternative to address the terminal building also includes associated improvements to the concrete commercial parking pad, airport access road, parking lot infrastructure, water, sewer, and fiber optic infrastructure, and replacement of the airfield beacon and tower. While most of these associated improvements did not have significant variations that were considered as individual alternatives, improvements to the water and sewer systems and the beacon and tower required further consideration, and the alternatives for these improvements are also included in this section.

The alternatives considered are discussed in Chapter 3 of the EA. The discussion of the No Action Alternative begins on page 18 of this Evaluation. Alternatives 1, 2, 3A, 3B, and 3C specifically address options for the terminal, with Alternatives 3A, 3B, and 3C presenting alternatives for location of the new terminal and demolition of the existing terminal. Alternative 3B is the Proposed Action.
Alternative W1 provides an alternative to construct onsite water supply infrastructure. Alternative S1 provides an alternative to construct onsite sanitary sewer treatment. And, Alternatives B1 and B2 are alternatives considered for the Yellowstone Airport Beacon and Tower.

These preliminary action alternatives are summarized below.

### 3.2.1 Alternatives Eliminated

The alternatives discussed in this section were evaluated with respect to the purpose and need discussed in Section 1.3 to provide an updated terminal facility as well as their ability to support overall needs of the Airport in the future. Alternatives that did not meet the purpose and need, were not feasible to implement, or would constrict the Airport’s ability to meet future demands, were eliminated from further evaluation and were not carried forward for analysis in the EA and will not be further considered in this Evaluation.

#### 3.2.1.1 Alternative 1: Rehabilitate Terminal Building In Place

This alternative would involve the rehabilitation of the existing structure through extensive remodeling.

Given the limitations of the existing footprint, adding on to the structure would be necessary in order to provide adequate space to accommodate non-sterile and sterile areas and respective restroom facilities, as well as TSA, airline, rental car, concessionaire, baggage claim, airport staff office(s), mechanical systems, etc. Remodeling the existing structure would require retrofitting new mechanical and electrical equipment to existing systems. Additionally, the facility would need to be brought up to current building codes to include providing American Disabilities Act (ADA) facilities and meeting current building, fire, and seismic codes.

Rehabilitation of the existing terminal would also require temporary facilities during construction to keep the terminal operational and to separate construction areas from the general public.

For this alternative, portions of the generator building would be rehabilitated (i.e. replacement of the degraded concrete fuel tank for the generator fuel supply).

Alternative 1 was ultimately not carried forward for further analysis due to the difficulty of continued maintenance of the existing terminal, difficulties in coupling old building materials and techniques with modern methods and retrofitting new mechanical and electrical equipment, required upgrades to meet ADA and building/fire codes, identified structural deficiencies in the existing terminal, and associated costs. Additionally, the limited footprint of the existing terminal would require extensive additions or remodels to accommodate current and future needs of the terminal building, and temporary facilities would be required while construction was taking place. Consequently, this alternative was found not to be prudent or feasible and was not considered further.

#### 3.2.1.2 Alternative 2: Construct New Terminal Building, Repurpose Existing Building

This alternative reviewed the construction of a new terminal and repurposing of the existing structure.
Many of the same challenges in rehabilitating the existing terminal in Alternative 1 are also applicable in repurposing the structure for another use (storage/FBO/rental car/concessionaire/etc.). While temporary facilities may not be necessary to construct to complete improvements, the age of the existing structure and layout require numerous updates to address code issues, as well as structural and layout issues to make it reasonably useable for other endeavors.

For this alternative, the generator building would likely be demolished and new generator equipment supplied with the new terminal building that would support that upsized facility and other necessary structures on the airport (i.e. ARFF building). It is unknown at this time if rehabilitation of the existing equipment and building would be a possibility to meet the power needs of the new terminal building and other structure(s) that are served off from that generator (i.e. ARFF building).

As with Alternative 1, Alternative 2 was ultimately not carried forward for further analysis due to the difficulty of continued maintenance of the existing terminal, difficulties in coupling old building materials and techniques with modern methods and retrofitting new mechanical and electrical equipment, required upgrades to meet ADA and building/fire codes, identified structural deficiencies in the existing terminal, and associated costs. Unique to Alternative 2, other difficulties included the constrictions that would be encountered for future terminal site development due to leaving the existing terminal in place and constructing another terminal, and the structural modifications that would be required for the new terminal to be repurposed for storage of aircraft or heavy equipment due to the presence of a basement in the existing terminal. Consequently, this alternative was found not to be prudent or feasible and was not considered further.

### 3.2.1.3 Alternative 3: Construct New Terminal Building, Demolish Existing Building

This alternative reviewed the construction of a new terminal adjacent to the existing terminal. In lieu of making any improvements to the existing terminal building, both the terminal and generator buildings would be proposed to be demolished in entirety and the areas rehabilitated for parking infrastructure or otherwise in support of the new terminal. The existing terminal could be utilized until the new one was constructed, thereby eliminating the need for temporary facilities.

Within the 2019 TANR, there were three siting options identified for consideration of the alternative to construct a new terminal building. Each siting option was evaluated using the following criteria: aircraft parking and circulation, relationship to other airport facilities, and expansion potential.

The following options for siting the new terminal were examined and are explained below:

- Alternative 3A – New Terminal Sited Adjacent and North of Existing Terminal
- Alternative 3B – New Terminal Sited Adjacent and South ofExisting Terminal (Proposed Action)
- Alternative 3C – New Terminal Sited at Far South End of Apron

A brief overview of Alternatives 3A and 3C (which were eliminated from further consideration) are provided in this Evaluation. A more detailed analysis is provided in Chapter 3 of the EA.
3.2.1.3.1 Alternative 3A – Site Adjacent and North of Existing Terminal

Alternative 3A proposes a new terminal building adjacent to and north of the existing terminal building. The loop road is shifted to the north to provide parking directly fronting the terminal building with employee parking to the north and rental car parking to the south. Future general aviation (GA) development, which might include large, executive hangars, would be focused at the south end of the apron.

Alternative 3A was ultimately not carried forward for further analysis due to the disadvantages in the general flow and layout of commercial and general aviation traffic, and limited opportunities for expansion of the new terminal and operations and maintenance facilities. Consequently, this alternative was found not to be prudent and was not considered further.

3.2.1.3.2 Alternative 3C – Site at Far South End of Apron

Alternative 3C places the new terminal building at the far south end of the apron. The loop road is extended to the south and public parking is provided directly fronting the terminal building. Employee parking is to the north. Rental car parking would be incorporated into the public parking lot. Space for future general aviation development would be maintained north of the employee parking lot and south of the ARFF facility. This area could also be available for ARFF expansion if needed.

Although this alternative offers similar advantages as Alternative 3B (Proposed Action), Alternative 3C was ultimately not carried forward for further analysis due to the overall layout, flow, and potential for future terminal expansion being much more advantageous under Alternative 3B. Additionally, the concrete commercial parking pad would require replacement due to shifting of parking for commercial aircraft being moved significantly to the south. Consequently, this alternative was found not to be prudent and was not considered further.

3.2.1.4 Alternatives Considered for Yellowstone Airport Beacon and Tower

Careful consideration was given to alternatives regarding the beacon and tower due to their potential as historic resources. While replacement of the existing Airport beacon with a new beacon and tower is included in the Proposed Action, the following alternatives were also considered for the existing beacon and tower.

3.2.1.4.1 Alternative B1 – Continue Operational Use of the Beacon and Tower

Under this alternative, the beacon and tower would remain in use at their current location, or be located elsewhere if needed in order to accommodate siting of the new terminal and parking lots.

The existing beacon was documented during the Airport’s 2019 FAA Part 139 Certification Inspection to have a flash rate (minimum rotations per minute) that is slower than required by FAA standards. The existing beacon is operating as designed, but no longer meets standards for an FAA Part 139 Airport such as WYS.

The beacon and tower were also noted as a platform for bird perching in the 2015 Wildlife Hazard Assessment and has a history of being used by ravens for perching and nesting. This presents a wildlife hazard for the Airport, as bird attractants on the
Airport could present opportunities for bird/aircraft collisions. The design of the current beacon and tower is such that airport staff have to climb the tower to clear the tower and keep birds from nesting, as well as perform any maintenance, which presents a safety issue for staff.

Maintenance of the historic-age beacon has also become very difficult. The WYS beacon was repaired in the spring of 2019 with replacement parts from a similar beacon salvaged from Columbus in 2018, as manufacturers are no longer making replacement parts.

Alternative B1 was ultimately not carried forward for further analysis because it does not meet the purpose and need. It does not provide a beacon with a flash rate that meets the requirement for a Part 139 Airport, it leaves a wildlife attractant on the Airport, and it remains a safety hazard for Airport staff who have to climb the tower to maintain the beacon or clear the tower of bird nests. Consequently, this alternative was found not to be prudent and was not considered further.

3.2.1.4.2 Alternative B2 – Discontinue Operation of the Existing Beacon and Tower, but Leave Intact on the Airport

Under this alternative, a new beacon and tower would be provided, and the existing historic-age beacon and tower would no longer be utilized as an operational Airport beacon. The existing beacon and tower would either remain in place, or be relocated on the Airport, so that much of the historic integrity of the resource would be retained.

Although this alternative would solve the issue of the beacon flash rate and difficulty of finding replacement parts, the other issues of the beacon and tower constituting a wildlife hazard and safety hazard for staff to maintain would remain. Airport staff would still have to clear the tower to keep birds from nesting, and maintain at least the appearance of the tower and beacon.

Alternative B2 was ultimately not carried forward for further analysis because it does not meet the purpose and need. It leaves a wildlife attractant on the Airport, and it remains a safety hazard for Airport staff who have to climb the tower to maintain the beacon or clear the tower of bird nests. Consequently, this alternative was found not to be prudent and was not considered further.

3.2.2 Alternatives Carried Forward for Analysis

3.2.2.1 No Action Alternative

This alternative involves the continued use of the existing facilities and infrastructure at WYS. No improvements would be made to the terminal or water/sewer/communications systems, and the airport beacon would not be replaced. The configuration and layout of WYS would remain unchanged from present conditions under this alternative, and no improvements or facilities would be added; only maintenance of existing facilities would be conducted to ensure continued operation of the Airport.

As configured, the terminal building does not conform to all current FAA design recommendations to support the current and anticipated volumes of the traveling public as discussed in Section 2.2.1 of the EA. Integrating the current space to facilitate post-911 TSA security requirements has been challenging, and limits passenger amenities for
what is available between the nonsterile and sterile sides of security (i.e. restrooms). Beyond the basic configuration and lack of flexibility to expand, the general construction of the building does not meet current codes (structural, electrical, etc.) or State of Montana High Performance Building Standards.

In addition to the terminal structure itself, the existing concrete commercial parking pad is offset from the existing terminal access for passengers, thereby complicating getting passengers deplaning commercial aircraft between the aircraft and terminal. Airline procedures in deplaning passengers (walking around wingtips and behind the aircraft) have resulted in the airline parking their aircraft on asphalt to the north of the existing pad.

Failure to provide improvements to water and sewer services would result in the continued issues as described in Sections 2.2.5 and 2.2.6 of the EA (i.e: low water pressure and capacity issues for septic drain fields).

Failure to provide improvements to communications systems (fiber optic) would result in continued issues as described in Section 2.2.7 of the EA (ie: marginal coverage, low internet speeds, limited capacity for users).

Additionally, failure to replace the Airport beacon will result in continued issues as described in Section 2.2.9 of the EA. These issues include bird safety concerns, access safety issues for staff, and the continued deficiency identified during the Airport’s 2019 FAA Part 139 Certification Inspection, when it was noted that the beacon was found to have a flash rate (i.e. minimum rotations per minute) slower than is required by FAA AC 150/5340-26C, Maintenance of Airport Visual Aid Facilities.

While the No Action Alternative does not meet the purpose and need, CEQ regulations require the FAA to consider a ‘no action’ alternative (40 CFR § 1502.14(d)). The No Action Alternative serves to describe the current and future state of the affected environment without considering the potential impacts of the Proposed Action or project. Figure 1-3 of the EA shows the existing airport layout that represents the No Action Alternative.

### 3.2.2.2 Proposed Action

The Proposed Action evaluated within the EA includes a number of improvements at WYS as described below and as depicted on Figures 1-4 and 1-5 of the EA that satisfy the Purpose and Need. The Proposed Action is described in detail in Section 1.3 of the EA.

- **New Terminal Building**
  - Construct approximate 29,000 SF terminal
  - Demolition of Airport Buildings
    - Airport terminal building
    - Generator building
  - Modifications to the Animal Control Fence to accommodate the new footprint of the new structure and features of the terminal area

- **Expand Concrete Commercial Parking Pad**

- **Reconstruct and Extend Airport Access Road**
  - Reconstruct the existing access road from HWY 191 to the area fronting the existing terminal building
• Extend the airport access road to the front of the new terminal building to facilitate access to proposed airport parking and the terminal

➤ Construct New Parking Lot Infrastructure
  • Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
  • Relocate existing car wash pad facilities for two resident rental car providers

➤ New Water Infrastructure Improvements
  • Extend water main infrastructure from town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the Airport, to allow for future connection by the USFS in the future. There will be a clearing width for the utility corridor of approximately 30 feet, where necessary.
    ▪ The water main is proposed to be routed to facilitate connection in the immediate vicinity of the USFS Jump Base and sized to accommodate projected needs should the USFS or other airport or non-aeronautical development desire to connect in the future.
    ▪ Construction and occasional maintenance of the new water infrastructure improvements on the Custer Gallatin National Forest will be carried out under a special use authorization from the USFS that will be issued to the State or Town (depending on final ownership of infrastructure) for the improvements and include maintenance of the corridor, weed management, and maintenance of barriers that will prevent public motorized use of the utility corridor in areas not currently authorized for motorized use by the public.
  • The existing well can be abandoned (well casing removed to below the ground level, plugged with bentonite, and capped). Any abandonment would be completed by a licensed well driller in accordance with State regulations.

➤ New Sewer Infrastructure Improvements
  • Extend sanitary sewer service from the terminal to the town of West Yellowstone sewer lagoons
    ▪ The system is proposed to be routed to facilitate connection to the USFS Jump Base and sized to accept effluent from the USFS Jump Base, to allow for USFS connection in the future.
    ▪ The existing septic tanks can be removed, and force main to the existing drain field and drain field abandoned in place.

➤ New Fiber Optic Infrastructure Improvements
  • Extend fiber optic infrastructure (buried in conduit) from the town of West Yellowstone to the new terminal, existing terminal area structures (ARFF and SRE buildings and FBO), and USFS Jump Base adjoining the airport, to allow for USFS connection in the future.
    ▪ Fiber optic is proposed to be collocated in the same trench as the water line from the town of West Yellowstone.
    ▪ In event that the designers determine it is best to offset the utilities, fiber optic can be trenched or plowed in adjacent to the water line alignment. There is no perceived need to disturb any areas outside of those already proposed to facilitate water main installation.
- If the connection to town water facilities is determined infeasible and Alternative W1 is employed to improve onsite water, new fiber optic infrastructure improvements will not be pursued.
- Construction and occasional maintenance of the new fiber optic infrastructure improvements on the Custer Gallatin National Forest would be carried out under a special use authorization from the USFS that will be issued to the utility company for the improvements and their operation and maintenance.

  - Timber clearing to facilitate subsurface utilities (i.e. water, sewer, and fiber optic).
  - Replacement of Existing Airport Beacon with New Beacon and Tower
    - The proposed location of a new rotating beacon is shown on Figure 1-4 of the EA. The upper portion of the existing beacon tower to include the top platform and beacon apparatus and enough of the tower to convey the design and function of the beacon will be preserved as a display either within the new airport terminal; or outside the new terminal building and within the terminal area at WYS.

3.2.2.3 Alternative W1 – Construct On-Site Water Supply Infrastructure

If town infrastructure cannot be extended to WYS, an alternative would be to construct an on-site water storage and supply system to provide appropriate potable and fire suppression water supply. It is anticipated that this alternative would include at least one new well, a sizeable holding tank with fire pump to meet fire suppression needs, a separate domestic water storage tank, an arsenic removal system to reduce well water to acceptable levels for public consumption, and the distribution infrastructure to tie to existing facilities serving other terminal area structures (ARFF, SRE, FBO buildings). Such a facility could be sited to the south of the apron area in the approximate 20 acres of timbered area within the animal control fence as per Figure 3-4 of the EA. All infrastructure would be proposed to remain on Airport property.

Extension of transmission infrastructure to the USFS Jump Base toward the north end of the airport along the east property boundary could occur if USFS requested to be joined to the onsite system.

Since fiber optic is proposed to be collocated in the same trench as the water line from the town of West Yellowstone, if the connection to town water facilities is determined infeasible and Alternative W1 is employed to improve onsite water, new fiber optic infrastructure improvements will not be pursued.

3.2.2.4 Alternative S1 – Construct On-Site Sanitary Sewer Treatment System

This alternative would replace the existing drain field treatment and provide additional gravity sewer infrastructure and possible lift station to an advanced treatment Level 2 septic system. The infrastructure for the existing force main and drain field would be abandoned in place as allowable per Montana Department of Environmental Quality (DEQ) and Gallatin County Health Department (GCCHD). The new proposed system would include an upsized septic tank, dose tank with pump, gravelless chambers, distribution valves/piping and electrical system(s). The proposed location for such a system would be near the proposed lift station and USFS Jump Base as reflected in Figure 3-5 of the EA. The system would be proposed to the north of the existing access
road and hangar area. As a Level 2 drain field footprint is much larger than a typical septic system, siting such a system may limit future hangar area and apron development options. Such a system would take advantage of the existing gravity flow system to the greatest extent possible. With the siting location to the north of the existing terminal developed area, it puts the system in close proximity to the USFS Jump Base, from which the USFS can extend their own force main system to the Level 2 drain field if they chose to connect.

A challenge with this type of system is providing a continual effluent supply to the drain field to maintain a microbial presence for treatment. With the terminal and USFS facilities being seasonal, connection of the Life Flight hangar (presently on a drain field) that maintains staff year-round would be critical to maintaining a functional Level 2 treatment system. Any Level 2 treatment system would be conditional on GCCHD and DEQ approval. Should a more advanced level of treatment be required, a lagoon or mechanical type system of treatment are potential solutions. Challenges that come with these options are that they cost more and would require additional environmental analysis before implementation.

3.3 Description of DOT Section 4(f) Resources Impacts and Measures to Minimize Harm

3.3.1 No Action Alternative

As the non-development alternative, the No Action Alternative will have no effect on Department of Transportation, Section 4(f) resources. However, the No Action Alternative is not a reasonable course of action because it would not meet the Purpose and Need.

3.3.2 Alternatives W1 and S1

Alternatives W1 and S1 will have no direct or constructive use under DOT Section 4(f) of the Custer Gallatin National Forest, the Great Bannock Trail, or the NPNHT as both alternatives will be installed on Airport property and will not cross the Custer Gallatin National Forest.

Alternatives W1 and S1 will also have no direct or constructive use of the terminal building or the beacon and tower as these are related to alternatives concerning water and sewer infrastructure that are directly related to terminal improvements; but are not related to the alternatives specifically regarding the fate of the existing terminal or beacon and tower.

3.3.3 Proposed Action

3.3.3.1 Custer Gallatin National Forest (USFS)

The extension of water and fiber optic utilities lines from the town of West Yellowstone to the Airport property will cross the Custer Gallatin National Forest. The utilities installation will require the clearing of timber to facilitate installation of the utilities. While much of the infrastructure will remain below the surface, there will be the need for fire hydrants, blow offs, valve boxes, utility junction boxes, and other ancillary structures that will be exposed at or above the ground surface. Construction of the utilities will result in short duration occupation and disturbance of property administered by the USFS.

Construction and occasional maintenance of the infrastructure improvements on the Custer Gallatin National Forest will be carried out under a special use authorization from
the USFS that will be issued to the State or Town (depending on final ownership of infrastructure) for the improvements and include maintenance of the corridor, weed management, and maintenance of barriers that will prevent public motorized use of the utility corridor in areas not currently authorized for motorized use by the public.

**Direct Impacts:**
As the utilities will remain physically present on the Custer Gallatin National Forest, the Proposed Action will result in “direct use” of the DOT Section 4(f) resource. However, the physical use has been determined to be *de minimus* considering that the installation of the utility infrastructure crossing the Custer Gallatin National Forest utilizes existing travel corridors, does not affect the overall physical characteristics of the Custer Gallatin National Forest, and will not adversely affect the activities, features, and attributes that qualify the Custer Gallatin National Forest for protection under DOT Section 4(f).

**Indirect/Constructive Use:**
No project-related constructive use effects are anticipated to occur under the Proposed Action, as neither the timber removal nor presence of underground utilities for water and fiber optic will impair the property after installation.

**Proposed Mitigation:**
Based on the DOT Section 4(f) Evaluation and coordination with FAA, MDT, and SHPO, a finalized Memorandum of Agreement (MOA) has been signed and is included as Attachment 3 of this document and Appendix I of the EA. The MOA includes required mitigation elements which include:
- Conduct a Historic American Engineering Record (HAER) level II documentation of the Yellowstone Airport Terminal.
- During construction of the improvements:

3.3.3.2 Yellowstone Airport Terminal Building (24GA1958)

**Direct Impacts:**
The terminal building will be demolished as part of the Proposed Action. As discussed in Section 3, it was determined that the rehabilitation or repurposing of the terminal was not reasonably feasible and did not meet the Purpose and Need as described in Section 1.3. The Proposed Action will have an “adverse effect” through the removal of the terminal under Section 106; therefore, the Proposed Action will result in “direct use” of the terminal under DOT Section 4(f).

**Indirect/Constructive Use:**
No project-related constructive use effects are anticipated to occur under the Proposed Action.

**Proposed Mitigation:**
Based on the DOT Section 4(f) Evaluation and coordination with FAA, MDT, and SHPO, a finalized Memorandum of Agreement (MOA) has been signed and is included as Attachment 3 of this document and Appendix I of the EA. The MOA includes required mitigation elements which include:
- Conduct a Historic American Engineering Record (HAER) level II documentation of the Yellowstone Airport Terminal.
- During construction of the improvements:
o Preserve rock materials from the façade of the original terminal to be repurposed into the new terminal, outside landscaping, and/or platform for the beacon tower display as described below.
  ▪ Design, manufacture, and install an interpretive display in the new terminal to provide pictures of the original terminal building and explain efforts to repurpose materials or features of the original terminal into terminal area improvements.
  ▪ SHPO will be provided the opportunity to review and provide comment on the details of repurposing the rock materials before plans are finalized, and review and comment on the interpretive sign. While no minimum amount of rock materials to be repurposed is specified in the MOA, SHPO will provide review and comment to ensure that the intent of this stipulation is met.

3.3.3.3 Yellowstone Airport Beacon Tower (24GA1981)

**Direct Impacts:**
The beacon and tower will be replaced as part of the Proposed Action. As discussed in Section 3, it was determined that the alternatives to replacing the beacon and tower were not feasible and did not meet the Purpose and Need as described in Section 1.3. The existing tower, tower foundation, and beacon will be removed from its existing location. The Proposed Action will have an “adverse effect” through the removal of the beacon and tower under Section 106; therefore, the Proposed Action will result in “direct use” of the airport beacon tower under DOT Section 4(f).

**Indirect/Constructive Use:**
No project-related constructive use effects are anticipated to occur under the Proposed Action.

**Proposed Mitigation:**
Based on the DOT Section 4(f) Evaluation and coordination with FAA, MDT, and SHPO, a finalized Memorandum of Agreement (MOA) has been signed and is included as Attachment 3 of this document and Appendix I of the EA. The MOA includes required mitigation elements which include:
- Conduct a Historic American Engineering Record (HAER) level II documentation of Yellowstone Airport Beacon Tower.
- During construction of the improvements:
  o Preserve the upper portion of the beacon tower to include the top platform and beacon apparatus and enough of the tower to convey the design and function of the beacon in order to display at WYS. The display will be located either within the new airport terminal or outside the new terminal building and within the terminal area.
    ▪ Design, manufacture, and install an interpretive sign for the beacon tower display to explain the importance of Montana’s Historic Airway Beacon System.
    ▪ SHPO will provided the opportunity to review and comment upon the design and location of the beacon tower display and the text and design of the interpretive sign. SHPO will be provided a copy of the final designs.
3.3.3.4 The Great Bannock Trail

The exact location of the Great Bannock Trail is unknown, although all research reviewed for the Addendum places the Great Bannock Trail to the north of WYS, and field surveys conducted for the Addendum uncovered no sign of the Great Bannock Trail. Government-to-government consultation was conducted with the Shoshone Bannock Tribes, and they posed no objections to the Proposed Action. There are no known direct or indirect effects anticipated to the Great Bannock Trail due to the Proposed Action, and no direct or constructive use under DOT Section 4(f).

3.3.3.5 The Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT)

Investigation into the location of the NPNHT in the Addendum placed the official designated route of the NPNHT to the north of the Airport and uncovered no physical remnants of the NPNHT in any of the surveys. The FAA conducted Government-to-government consultation with the Nez Perce Tribe, and the Nez Perce Tribal Historic Preservation Officer (NP THPO) raised concerns that any potential effect due to the Proposed Action on the NPNHT or to the Nez Perce Tribe could not be adequately evaluated without an ethnographic study to gather oral history regarding the Nez Perce experience during the Nez Perce War of 1877 while pursued by the United States Army (US Army).

The Proposed Action will largely be constructed on Airport property in areas of developed or heavily disturbed land, except for the utility corridor for water and fiber optic improvements which will be extended from the town of West Yellowstone to WYS and will cross The Custer Gallatin National Forest. The FAA, USFS, and MDT have agreed that an ethnographic study is the appropriate means to examine potential effects on the NPNHT and current Nez Perce Tribe due to the utility corridor crossing the Custer Gallatin National Forest, because of the gravity and significance of the Nez Perce War of 1877 upon the Nez Perce Tribe, the ambiguous nature of the true path they followed, and the proximity of the utility corridor crossing the Custer Gallatin National Forest to the designated location for the NPNHT. While there are no known direct or indirect impacts under DOT Section 4(f) at this time, mitigation measures described below due to the potential for adverse impacts that could be uncovered during the ethnographic study.

Direct Impacts:
Unknown, but none currently identified.

Indirect/Constructive Use:
Unknown, but none currently identified.

Proposed Mitigation:
The Proposed Action has an unknown effect under Section 106 on the archaeological and cultural aspects of the NPNHT and Nez Perce Tribe; and therefore, also have the potential for a use under DOT Section 4(f). A Programmatic Agreement (PA) under Section 106 has been developed to determine if any adverse effects will be identified through an ethnographic study. The signed PA is included as Attachment 4 of this document and Appendix I of the EA.

If no adverse effects under Section 106 are identified through the ethnographic study conducted under the terms of the PA, then there is no use of the DOT Section 4(f)
resource, and no further action is required. If adverse effects are identified through the ethnographic study, the Signatories of the PA will execute a Memorandum of Agreement (MOA) to document the mitigation requirements for the adverse effects consistent with 36 CFR § 800.5-6, will notify the Advisory Council of Historic Preservation of the adverse effect finding, and invite them to participate in consultation consistent with 36 CFR § 800.6(a)(1). Additionally, a DOT Section 4(f) Evaluation will be conducted to determine if there is any use of the DOT Section 4(f) resource.

4. COORDINATION

Coordination among the FAA, SHPO, MDT – Aeronautics Division (Sponsor), Custer Gallatin National Forest (USFS), Native American Tribes, and the public was conducted early in the EA process and is summarized below.

4.1 Coordination with the State Historic Preservation Office and the Advisory Council on Historic Preservation

Initial coordination was completed with the FAA and SHPO concerning the terminal and beacon historic resources. That coordination included all practical planning measures to avoid impacts to those resources. Where impacts could not be avoided, measures to minimize harm were included in the alternatives development. Coordination included:

- Several meetings and conference calls with the various members of the project team to confirm the area of potential impact, project alternatives, and initial options to consider for mitigation.
- Site visits and meetings by multiple members of the project team, which included the Airport Manager, the project Environmental Specialist/Airport District Office (ADO) representative, and the archaeological representative for the architectural historian to discuss eligibility of the resources, location of the alternatives in relation to the resources, avoidance alternatives, and effects determinations outlined in the Section 106 Cultural Resources Inventory.
- In a letter dated September 14th, 2020, SHPO concurred (Attachment 1 of this document and Appendix B of the EA) with the FAA determination of eligibility to the NRHP of the terminal and beacon and that their removal will constitute an adverse effect to these historic properties.
- SHPO was a signatory on the MOA and the PA (Attachments 3 and 4 of this document and Appendix I of the EA).
- FAA notified the Advisory Council on Historic Preservation (ACHP) on August 5th, 2020 to provide information and an invitation to participate in the Section 106 consultation. A response was received from ACHP on August 20th, 2020, declining the invitation to participate unless circumstances change and their participation is needed (Attachment 2 of this document and Appendix I of the EA).

4.2 Coordination with Tribes

The FAA sent an invitation for Government-to-Government tribal consultation on the Proposed Action to the following Tribes in letters dated August 29, 2019 (Appendix K of the EA): the Blackfeet Nation, the Coeur d’Alene Tribe, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Kootenai Tribe of Idaho, Nez Perce Tribe, and the Shoshone Bannock Tribes. A summary of the responses provided are as follows:
• Confederated Salish and Kootenai Tribes of the Flathead Reservation posed no objections to the undertaking.
• Shoshone Bannock Tribes: Emailed the FAA on August 30, 2019 to request a consultation via staff to staff meeting where the Airport improvements could be presented.
  o Staff from FAA, MDT Aeronautics Division, and Morrison-Maierle (the consultant for the Airport) met with the Shoshone Bannock Tribes on October 15, 2019, to present the projects included within the Proposed Action. During this meeting, the Tribes brought up concerns about the Great Bannock Trail. The Tribes requested that the Cultural Resource Inventory(s) (CRI) be provided once completed for further review and comment.
• Nez Perce Tribe: Called attention to the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT), which commemorates the US Army’s pursuit of the Nez Perce during the summer of 1877 during the Nez Perce War of 1877. The communication stated that both the events and the trail are hugely significant to the Nez Perce Tribe.

The NPNHT and the Great Bannock Trail were given specific consideration during the research and fieldwork for the Addendum. No evidence (based on surface observation) was found for either resource within the project area, and information obtained through literature searches placed the location of both Trails to the north of the APE for the Proposed Action and Alternatives W1 and S1.

In letters dated March 20, 2020, the CRI and the Addendum were sent to the Tribes that were previously contacted in August of 2019 to again extend the invitation for Government-to-Government tribal consultation and seek input on properties of cultural or religious significance that may be affected by the Proposed Action or Alternatives W1 and S1. A summary of the responses provided are as follows:

• Shoshone Bannock Tribes: The Tribes wanted to ensure that their ancestral presence within the area was noted and had a question about LIDAR surveys; both issues were addressed either within the Addendum or through follow up e-mail contact. While the Tribes noted they would provide a response upon acknowledging receipt of the CRI, no response was received and no further concerns were raised.
• Nez Perce Tribe: While the Tribe acknowledged that surface observation did not reveal the presence of archaeological resources, they voiced concern that the analysis did not analyze the trail as ethnographic or a traditional cultural property.
  o Staff from FAA, USFS, MDT Aeronautics Division, and Morrison-Maierle (the consultant for the Airport) attended teleconferences (May 4th, 2020 and June 22, 2020) with the Nez Perce Tribal Archaeologist / Tribal Historic Preservation Officer (THPO) to further discuss the Tribe’s concerns and work to find an acceptable solution regarding the NPNHT. These discussions and further consultation and review of draft versions of the PA resulted in the approval of the PA (Attachment 4 of this document and Appendix I of the EA).

4.3 Coordination with Owners of DOT Section 4(f) Resources

As the undertaking would include improvements on the Custer Gallatin National Forest and require a special use authorization from the USFS, the USFS was a cooperating agency in the preparation of the EA. The USFS also intends to financially contribute to the utility improvements included in the Proposed Action for water, fiber optic, and sewer infrastructure to provide for layout and sizing to allow for eventual connection to the USFS West Yellowstone Interagency Fire
Center (USFS Jump Base). The USFS were actively involved in planning the proposed utility improvements both on and off Airport property to minimize impacts to the Custer Gallatin National Forest, and ensure the potential for improved utility service to the Jump Base. The USFS reviewed documents involved in preparation of the EA, and in the preparation of the EA itself, and will be involved in the NEPA determination to ensure all requirements are met for the document to comply with USFS Forest Service Manual (FSM) 1950 Environmental Policy and Procedures, the Forest Service Handbook (FSH) 1909.15 National Environmental Policy Act Handbook, and other legal requirements.

The Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower is owned by MDT – Aeronautics Division (Airport Sponsor), and is the proponent of the proposed improvements. MDT has been actively involved throughout the planning and NEPA process.

4.4 Coordination with the Public

A public meeting to provide a project overview of proposed improvements and to receive any comments to consider in completion of the EA was held on September 16, 2019 in West Yellowstone, Montana. Residents, airport users, and agencies were provided an opportunity to voice their comments and ask questions on the improvements being considered. Notice was provided via the Bozeman Daily Chronicle, MDT and Airport websites, and posting at select locations in the Town of West Yellowstone. Two written comments from the general public were received, which are included in Appendix L of the EA. Verbal comments received during the meeting are provided in the transcribed meeting notes also provided in Appendix L.

5. Finding

After careful and thorough consideration, the FAA determined that there are no feasible and prudent alternatives to the use of DOT Section 4(f) resources.

As demonstrated in Section 3 of this Evaluation, the Proposed Action includes efforts to minimize impacts to the Custer Gallatin National Forest, a DOT Section 4(f) resource, by utilizing an existing travel corridor (unimproved jeep trail), access roads for the Airport and USFS Jump Base, and an existing overhead power line corridor for the installation of the utility infrastructure crossing the Custer Gallatin National Forest.

As demonstrated in Section 3 of this Evaluation, alternatives to avoid removal of the existing Yellowstone Airport Terminal and Yellowstone Airport Beacon Tower did not meet the purpose and need of the project. The Proposed Alternative is the only alternative that meets the purpose and need; however, it requires the removal of these resources. The Proposed Action includes mitigation for these resources under Section 106 as outlined in the MOA (Attachment 3 of this document and Appendix I of the EA).

No impacts have been identified regarding the NPNHT; however, the FAA has agreed that an ethnographic study is appropriate to identify unknown impacts to the NPNHT and Nez Perce Tribe. The Proposed Action includes compliance with the approved PA (Attachment 4 of this document and Appendix I of the EA) in order to conduct an ethnographic study with the Nez Perce Tribe regarding the NPNHT in the Hebgen Basin of Montana pursuant to 36 CFR § 800.14(b)(ii) and 36 CFR § 800.14(b)(v) when effects on historic properties cannot be fully determined prior to approval of an undertaking and other circumstances warrant a departure from the normal Section 106 process. If no adverse effects under Section 106 are identified through the ethnographic study conducted under the terms of the PA, then there is no use of the DOT
Section 4(f) resource, and no further action is required. If adverse effects are identified through the ethnographic study, the Signatories of the PA will execute a Memorandum of Agreement (MOA) to document the mitigation requirements for the adverse effects consistent with 36 CFR § 800.5-6, will notify the Advisory Council of Historic Preservation of the adverse effect finding, and invite them to participate in consultation consistent with 36 CFR § 800.6(a)(1). Additionally, a DOT Section 4(f) Evaluation 4(f) will be conducted to determine if there is any use of the DOT Section 4(f) resource.
ATTACHMENT 1

State Historic Preservation Office (SHPO) Letter Dated September 14, 2020
September 14, 2020

Ms. Dian Stilson, P.E.
FAA Helena Airport District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602-1213

Ref: Determinations of Eligibility and Effect on Historic Properties due to Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, Montana

Dear Ms. Stilson,

Thank you for consulting with the Montana State Historic Preservation Office regarding the project listed above. SHPO concurs with your determination of eligibility that both the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are eligible for the National Register of Historic Places under Criteria A and C. In addition, SHPO concurs with your finding that the removal of these two features under the proposed actions as stated in your consultation package will constitute an adverse effect to these historic properties.

While SHPO is aware that there were informal discussions regarding possible mitigation measures to offset this adverse effect, SHPO would like to invite FAA to draft some possible mitigation efforts to begin the collaborative process of drafting a MOA.

Please do not hesitate to contact me regarding this letter or its contents. I can be reached at 406.444.7717 or at eric.newcombe@mt.gov.

Sincerely,

[Signature]

Eric Newcombe, M.A.
Historic Architecture Specialist
State Historic Preservation Office
Montana Historical Society
P.O. Box 201202/1301 E. Lockey Avenue
Eric.Newcombe@mt.gov
(406) 444-7717
www.montanahistoricalsociety.org

File ID: FAA-2020-2020091105
August 20, 2020

Ms. Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602

Ref: Construction of a New Airport Terminal and Associated Improvements at Yellowstone Airport
West Yellowstone, Gallatin County, Montana
ACHP Project Number: 15782

Dear Ms. Stilson:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, of our regulations, “Protection of Historic Properties” (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Montana State Historic Preservation Officer (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Anthony Guy Lopez at (202) 517-0220 or by email at alopez@achp.gov.

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs
MEMORANDUM OF AGREEMENT

AMONG THE
FEDERAL AVIATION ADMINISTRATION,
THE MONTANA DEPARTMENT OF TRANSPORTATION — AERONAUTICS DIVISION,
AND THE MONTANA STATE HISTORIC PRESERVATION OFFICE,
REGARDING

THE PROPOSED CONSTRUCTION OF NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

WHEREAS the Federal Aviation Administration (FAA) is considering funding for the construction of a new terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana, pursuant to 49 USC § 47107(a)(16), FAA Order 5100.38D, Airport Improvement Program Handbook, and Coronavirus Aid, Relief, and Economic Security (CARES) Act Airport Grant Program; and

WHEREAS the undertaking consists of the construction of a new terminal building and parking lot infrastructure; demolition of the existing terminal and generator building; expansion of a concrete commercial aircraft parking pad; reconstruction and extension of the airport access road; new water, sewer, and fiber optic infrastructure improvements; timber clearing to facilitate subsurface utilities; and replacement of the existing airport beacon with a new beacon and tower (layouts included in Appendix A); and

WHEREAS, the FAA has determined that this undertaking is subject to the National Environmental Policy Act (NEPA) as well as the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended); and

WHEREAS, the FAA is the lead agency for complying with NEPA; Section 106 of the NHPA as amended (16 USC 470f), and the regulations implementing Section 106 of the NHPA (36 CFR Part 800); and Government to Government consultation under Executive Order 13175; and

WHEREAS, the State of Montana - Department of Transportation Aeronautics Division (MDT), Airport Sponsor for the Yellowstone Airport (WYS), is the entity proposing the construction of a new terminal and associated improvements at WYS near West Yellowstone, Montana; and

WHEREAS, the FAA has defined the undertaking’s area of potential effect (APE), as defined at 36 CFR part 800.16(d), to correspond to the terminal area and areas of disturbance for utility improvements as shown in Appendix A; and

WHEREAS the FAA has determined that the undertaking may have an adverse effect on the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), which are eligible to the National Register of Historic Places (NRHP) under Criteria A and C and are proposed for removal under the proposed undertaking. The FAA has consulted with the Montana State Historic Preservation Office (SHPO) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the NHPA (54 USC § 306108); and
WHEREAS, the FAA contacted the Blackfeet Nation, the Coeur d’Alene Tribe, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Kootenai Tribe of Idaho, the Nez Perce Tribe, and the Shoshone Bannock Tribes in accordance with Section 106 of the NHPA and implementing regulations 36 CFR Part 800 regarding the effects of the undertaking on historic properties and Executive Order 13175 to initiate government to government consultation; and

WHEREAS, the FAA received responses from the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Shoshone Bannock Tribes, and the Nez Perce Tribe; and

WHEREAS the Confederated Salish and Kootenai Tribes of the Flathead Reservation posed no objections to the proposed undertaking; and

WHEREAS the FAA has consulted with the Shoshone Bannock Tribes regarding the effects of the undertaking on historic properties, to include the Great Bannock Trail, and the Shoshone Bannock Tribes posed no objections to the proposed undertaking; and

WHEREAS, the FAA has consulted with the Nez Perce Tribe regarding the effects of the undertaking on historic properties and the Nez Perce Tribal Historic Preservation Officer (NP THPO) raised concerns that any potential effect to the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) or to the Nez Perce Tribe could not be adequately evaluated without ethnographic studies on the NPNHT to gather oral history regarding the Nez Perce experience during the Nez Perce War of 1877 while pursued by the United States Army (US Army); and

WHEREAS the FAA has agreed to pursue a Programmatic Agreement (PA) to conduct ethnographic studies with the Nez Perce Tribe regarding the NPNHT in the Hebgen Basin of Montana pursuant to 36 CFR § 800.14(b)(ii) and 36 CFR § 800.14(b)(v) when effects on historic properties cannot be fully determined prior to approval of an undertaking and other circumstances warrant a departure from the normal Section 106 process; and the terms of the PA will be carried out prior to any construction, disturbance, or timber removal related to utility improvements that will cross the Custer Gallatin National Forest between the town of West Yellowstone and WYS; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FAA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation regarding the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) as well as the potential adverse effect determination as a result of the evaluation of the ethnographic studies conducted under a PA and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, the FAA, MDT, and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.
STIPULATIONS

The FAA, in coordination with MDT and SHPO shall ensure that the following measures are carried out:

I. MITIGATION PLAN

A. Conduct a Historic American Engineering Record (HAER) level II documentation of Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower at the Yellowstone Airport.

B. During construction of the improvements:
   1. Preserve the upper portion of the beacon tower to include the top platform and beacon apparatus and enough of the tower to convey the design and function of the beacon in order to display at WYS. The display will be located either within the new airport terminal or outside the new terminal building and within the terminal area.
      a) Design, manufacture, and install an interpretive sign for the beacon tower display to explain the importance of Montana’s Historic Airway Beacon System.
      b) SHPO will provided the opportunity to review and comment upon the design and location of the beacon tower display and the text and design of the interpretive sign. SHPO will be provided a copy of the final designs.
   2. Preserve rock materials from the façade of the original terminal to be repurposed into the new terminal, outside landscaping, and/or platform for the beacon tower display described in (1) above.
      a) Design, manufacture, and install an interpretive display in the new terminal to provide pictures of the original terminal building and explain efforts to repurpose materials or features of the original terminal into terminal area improvements.
      b) SHPO will be provided the opportunity to review and provide comment on the details of repurposing the rock materials before plans are finalized, and review and comment on the interpretive sign. While no minimum amount of rock materials to be repurposed is specified in this MOA, SHPO will provide review and comment to ensure that the intent of this stipulation is met.

II. PROFESSIONAL QUALIFICATIONS

A. Professional Qualifications and Cultural Resources Permitting
   1. All actions prescribed by this MOA that involve the identification, evaluation, analysis, recording, treatment, monitoring, and disposition of historic properties, and involve the reporting and documentation of such actions in the form of reports, forms, or other records, shall be carried out by or under the direct supervision of a person or persons meeting at a minimum, the Secretary of the Interior’s Professional Qualifications Standards (PQS) for archaeology, history, or architectural history, as appropriate (48 FR 44739).

B. Documentation Standards
   1. The report and documentation of the actions cited in Stipulation I shall conform with the Secretary of the Interior’s Standards and Guidelines for Archaeology and
Historic Preservation (48 FR. 44716-44740), as well as with all applicable standards, guidelines, and forms for historic preservation established by the SHPO.

III. MONITORING AND REPORTING

Each quarter following the execution of this MOA until it expires or is terminated, MDT shall provide the FAA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in MDT’s efforts to carry out the terms of this MOA. This report can be included with the Quarterly Performance Report that is required in accordance with 49 CFR 18.40 for projects funded under the Airport Improvement Program (AIP), which is due within 30 days after the end of each quarter (due by January 30, April 30, July 30, October 30). Any Final Reports required for FAA grants accepted by the Airport Sponsor (AIP or CARES Act) for design or construction of the undertaking shall include a description of the steps taken and progress of meeting the terms of this MOA, and/or how the terms of this MOA have been met. Upon receipt, the FAA will distribute the summary to the SHPO.

IV. POST-REVIEW DISCOVERIES

If the proposed project activities encounter a previously unknown cultural resource, or if project activities directly or indirectly affect a known resource in an unanticipated manner, the FAA shall implement the Plan for Discovery of Unanticipated Cultural Resources included in Appendix B of this MOA.

V. DISCOVERY OF HUMAN REMAINS

If construction or other project personnel identify what they believe to be human remains, they will immediately halt construction at that location and notify the county coroner per the provisions of Montana’s Human Skeletal Remains and Burial Site Protection Act (22-3-801 et seq. MCA) and the Native American Graves Protection and Repatriation Act (NAGPRA) (if the discovery is on Federal land). The coroner has two (2) working days to determine if the remains represent a crime scene or if the remains must be removed in order to determine if they are a crime scene. No one else has the authority to make this determination or remove any evidence or remains. The coroner should make every reasonable effort to accomplish the determination without disturbing the remains. If the coroner determines that the remains are not a crime scene:

A. If the human remains are found on private or state property, then the coroner must then notify the SHPO of the findings within 24 hours. The SHPO will notify the State Burial Board, the landowner (if this has not already occurred), and Tribes (as appropriate). The Board or its duly appointed representative will determine, in concert with the landowner, an appropriate disposition of the remains. Once the Board has made that determination, the Board will authorize commencement of work or outline other arrangements.

B. If the human remains are found on federal property, the federal agency will follow NAGPRA guidelines and notify the appropriate Tribes.
VI. DURATION

This MOA will expire if its terms are not carried out within (5) years from the date of its execution or at the completion of all associated construction required to construct a new terminal and replace the Airport beacon and tower and submission of the associated Final Reports under AIP and the CARES Act; whichever comes later. Prior to such time, the FAA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VIII below.

VII. DISPUTE RESOLUTION

Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the FAA shall consult with such party to resolve the objection. If the FAA determines that such objection cannot be resolved, the FAA will:

A. Forward all documentation relevant to the dispute, including the FAA’s proposed resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. The FAA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FAA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA, and provide them and the ACHP with a copy of such written response.

C. The FAA’s responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VIII. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

IX. TERMINATION

A. If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation VIII, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

B. Once the MOA is terminated, and prior to work continuing on the undertaking, the FAA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) execute a PA pursuant to 36 CFR § 800.14 or (c) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. The FAA shall notify the signatories as to the course of action it will pursue.

C. Execution of this MOA and implementation of its terms evidence that the FAA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.
SIGNATORIES:

UNITED STATES OF AMERICA
FEDERAL AVIATION ADMINISTRATION

STEVEN L ENGBRECHT
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Date: 2021.03.05 08:01:13 -07'00'

March 5, 2021

Steve Engebrect, Acting Manager
Helena Airports District Office

MONTANA STATE HISTORIC PRESERVATION OFFICE

Pete Brown
Date: April 5, 2021
State Historic Preservation Officer

STATE OF MONTANA – DEPARTMENT OF TRANSPORTATION

Tim Conway
Date: March 19, 2021
Administrator, Aeronautics Division

APPROVED FOR LEGAL CONTENT

Date: 3/22/2021
By [Signature]
ATTACHMENT 4

Programmatic Agreement (PA) 2021
PROGRAMMATIC AGREEMENT

AMONG THE
FEDERAL AVIATION ADMINISTRATION,
THE UNITED STATES FOREST SERVICE,
THE MONTANA DEPARTMENT OF TRANSPORTATION – AERONAUTICS DIVISION,
THE MONTANA STATE HISTORIC PRESERVATION OFFICE,
AND THE NEZ PERCE TRIBE
REGARDING

THE PROPOSED CONSTRUCTION OF NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

WHEREAS the Federal Aviation Administration (FAA) is considering funding for the construction of a new terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana, pursuant to 49 USC § 47107(a)(16), FAA Order 5100.38D, Airport Improvement Program Handbook, and Coronavirus Aid, Relief, and Economic Security (CARES) Act Airport Grant Program; and

WHEREAS the undertaking consists of the construction of a new terminal building and parking lot infrastructure; demolition of the existing terminal and generator building; expansion of a concrete commercial aircraft parking pad; reconstruction and extension of the airport access road; new water, sewer, and fiber optic infrastructure improvements; timber clearing to facilitate subsurface utilities; and replacement of the existing airport beacon with a new beacon and tower (layouts included in Appendix A); and

WHEREAS, the FAA has determined that this undertaking is subject to the National Environmental Policy Act (NEPA) as well as the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended); and

WHEREAS, the FAA is the lead agency for complying with NEPA; Section 106 of the NHPA as amended (16 USC 470f), and the regulations implementing Section 106 of the NHPA (36 CFR Part 800); and Government to Government consultation under Executive Order 13175; and

WHEREAS, the United States Forest Service (USFS) is considering issuance of a special use authorization for the installation of water and fiber optic infrastructure on the Custer Gallatin National Forest and financial contribution to infrastructure improvements to facilitate potential connection for the USFS West Yellowstone Interagency Fire Center adjacent to WYS and is a cooperating agency for NEPA compliance; and

WHEREAS, the State of Montana - Department of Transportation Aeronautics Division (MDT), Airport Sponsor for the Yellowstone Airport (WYS), is the entity proposing the construction of a new terminal and associated improvements at WYS near West Yellowstone, Montana; and

WHEREAS, the FAA has defined the undertaking’s area of potential effect (APE), as defined at 36 CFR § 800.16(d), to correspond to the terminal area and areas of disturbance for utility improvements as shown in Appendix A; and
WHEREAS, the FAA has undertaken efforts to identify historic properties eligible for listing on the National Register of Historic Places (NRHP) and has consulted with the Montana State Historic Preservation Office (MT SHPO) to prepare a Memorandum of Agreement (MOA) regarding adverse effects on the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), which are eligible to the NRHP under Criteria A and C and are proposed for removal under the proposed undertaking; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FAA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation regarding the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the FAA contacted the Blackfeet Nation, the Coeur d’Alene Tribe, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Kootenai Tribe of Idaho, the Nez Perce Tribe, and the Shoshone Bannock Tribes in accordance with Section 106 of the NHPA and implementing regulations 36 CFR Part 800 regarding the effects of the undertaking on historic properties and Executive Order 13175 to initiate government to government consultation; and

WHEREAS, the FAA received responses from the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Shoshone Bannock Tribes, and the Nez Perce Tribe; and

WHEREAS, the Confederated Salish and Kootenai Tribes of the Flathead Reservation posed no objections to the undertaking; and

WHEREAS, the FAA has consulted with the Shoshone Bannock Tribes regarding the effects of the undertaking on historic properties, to include the Great Bannock Trail, and the Shoshone Bannock Tribes posed no objections to the undertaking; and

WHEREAS, the FAA has consulted with the Nez Perce Tribe regarding the effects of the undertaking on historic properties and the Nez Perce Tribal Historic Preservation Office (NP THPO) raised concerns that any potential effect to the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) or to the Nez Perce Tribe could not be adequately evaluated without an ethnographic study on the NPNHT to gather oral history regarding the Nez Perce experience during the Nez Perce War of 1877 while pursued by the United States Army (US Army); and

WHEREAS, investigation into the location of the NPNHT placed the official designated route of the NPNHT to the north of the APE and uncovered no physical remnants of the NPNHT in the APE; and

WHEREAS the undertaking will largely be constructed on airport property in areas of developed or heavily disturbed land, except for the utility corridor for water and fiber optic improvements which will be extended from the town of West Yellowstone to WYS and cross the Custer Gallatin National Forest; however, the FAA, MDT, and USFS have agreed that approximately 800 members of the Nez Perce Tribe passed through the general area of the designated route of the NPNHT, and likely did not stay within the boundaries of the NPNHT as it is delineated today; and have further agreed that the events surrounding the Nez Perce War of 1877 on the NPNHT were a traumatic and significant event upon the Nez Perce of the time, and potentially has lasting impacts upon current members of the Nez Perce Tribe; and
WHEREAS, the FAA, MDT, and USFS have agreed with the NP THPO that due to the gravity and significance of the Nez Perce War of 1877 upon the Nez Perce Tribe, the ambiguous nature of the true path they followed, and the proximity of the utility corridor crossing the Custer Gallatin National Forest for water and fiber optic improvements to the designated location for the NPNHT; that an ethnographic study is the appropriate means to examine potential effects on the NPNHT and current Nez Perce Tribe due to the utility corridor crossing the Custer Gallatin National Forest; and

WHEREAS, it will take significant time for the Nez Perce Tribe to conduct an ethnographic study to assess the oral history of the Nez Perce experience in the Hebgen Basin during the Nez Perce War of 1877, which is complicated by the COVID 19 pandemic; and the likelihood of encountering significant physical remnants of the passage of the Nez Perce in 1877 that will be adversely affected by the undertaking is remote and likely to be lesser value than assessment of the oral histories; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FAA has notified the ACHP of the potential adverse effect determination as a result of the evaluation of the ethnographic study conducted under a PA and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, the FAA, MDT, USFS, MT SHPO, and the Nez Perce Tribe agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking, specifically the utility corridor for water and fiber optic improvements, on the NPNHT and Nez Perce Tribe:

STIPULATIONS

The FAA and USFS, in coordination with the MT SHPO, MDT, and NP THPO, shall ensure that the following measures are carried out:

I. INTENT

A. This Programmatic Agreement (PA) has been developed in order for the Nez Perce Tribe to conduct an ethnographic study regarding the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) in the Hebgen Basin of Montana pursuant to 36 CFR § 800.14(b)(ii) and 36 CFR § 800.14(b)(v) when effects on historic properties cannot be fully determined prior to approval of an undertaking and other circumstances warrant a departure from the normal Section 106 process.

B. Provisions of this PA will be incorporated in the Environmental Assessment (EA) being prepared for the undertaking for compliance with the National Environmental Protection Act (NEPA) and any resulting decision documents to ensure that effects due to the undertaking are assessed through the ethnographic study and that any adverse effects of the undertaking, specifically due to installation of a utility corridor for water and fiber optic improvements crossing the Custer Gallatin National Forest, upon the NPNHT and Nez Perce Tribe are adequately mitigated if adverse effects are identified in accordance with 36 CFR § 800.5.

C. Tiered Agreements: If adverse effects are identified, the signatories of this PA will execute a Memorandum of Agreement (MOA) to document the mitigation requirements
for the adverse effects consistent with 36 CFR § 800.5-6, will notify the Advisory Council of Historic Preservation of the adverse effect finding, and invite them to participate in consultation consistent with 36 CFR § 800.6(a)(1).

D. The terms of this PA will be carried out prior to any ground disturbing activities, construction, or timber removal related to utility improvements that will cross the Custer Gallatin National Forest between the town of West Yellowstone and WYS.

E. The EA includes an alternative for onsite improvements for water infrastructure at WYS. This alternative would be utilized in the case that extending water infrastructure from West Yellowstone is found to be impractical, which could include the failure to meet the terms of this PA.

1. If improvements for water infrastructure are not extended from West Yellowstone, the fiber optic line will not be constructed, as the utility corridor for a fiber optic line will be co-located with the new water line extending services from West Yellowstone.

2. If extending water services from West Yellowstone is found to be impractical and the utility corridor from West Yellowstone to WYS is not needed, then there will be no adverse effects to the NPNHT and Nez Perce Tribe from the Proposed Action as identified in the EA. In the event of this situation, the Signatories of this PA will resume consultation to determine if termination of the ethnographic study is practical, or if completing the ethnographic study per Stipulation III is the best course of action.

II. ROLES AND RESPONSIBILITIES

A. The FAA and the USFS shall incorporate the terms of this PA into any environmental determination resulting from the EA being prepared for the undertaking for NEPA compliance. Stipulations contained within this PA will be adhered to in order for the undertaking to comply with NEPA, Section 106 of the NHPA, and Government to Government consultation with the Nez Perce Tribe in accordance with Executive Order 13175.

B. The FAA, USFS, and MDT will complete a reasonable and good faith effort to pursue completion of the ethnographic study and assess effects due to the undertaking in accordance with 36 CFR § 800.5. If adverse effects are identified, they will be resolved in consultation with Signatories to this PA consistent with Stipulation I(C).

C. The Nez Perce Tribe will conduct the ethnographic study with Tribal elders, archive searches, and other sources to gather oral histories and information regarding the Nez Perce experience during the Nez Perce War of 1877 in the Hebgen Basin while being pursued by the US Army. The ethnographic study will be conducted to gather information on these important histories in the Hebgen Basin, and in a timely manner; taking into consideration adequate precautions due to COVID 19 and to assess any effects that need to be considered prior to physical construction of the utility corridor as described in Stipulation I(D).
D. The FAA, USFS, and MDT shall ensure that no ground disturbing activities, construction, or timber removal outside of the terminal area and airport property for the utility corridor for water and fiber optic on the Custer Gallatin National Forest as identified in Stipulation I(D) will take place until the evaluation of the ethnographic study has occurred, effects due to the undertaking have been assessed, and mitigation of any potential adverse effects have been documented in an MOA consistent with Stipulation I(C).

E. Funding for the ethnographic study will be provided through applicable sources from the FAA, USFS, and MDT as part of project development or design costs, pending successful completion of the NEPA process and issuance of a decision document for the undertaking under NEPA. While the USFS also has an undertaking requiring Section 106 compliance and thus potential obligations for funding mitigation costs, the USFS policy is to require payment of those fees by its permit applicants. Thus, any fees attributable to the USFS will be accomplished via agreement with MDT in consideration of design and construction costs for utility improvements to facilitate potential connection for the USFS West Yellowstone Interagency Fire Center.

F. The ethnographic study will be performed by the Nez Perce Tribe in accordance with 2 CFR § 200.320(f), *Procurement by Noncompetitive Proposals*, when an item is available only from a single source. The Nez Perce Tribe will prepare a cost analysis for noncompetitive procurement proposals in accordance with 2 CFR § 200.323, *Contract cost and price*.

G. The Nez Perce Tribe will retain the results of the ethnographic study along with all research notes and interview transcripts. Any specific findings from the ethnographic research will not be shared outside of the Nez Perce Tribe without a need to access the information and only with the express permission of the Nez Perce Tribe.

H. An executive report containing information from the ethnographic study will be prepared for the FAA, USFS, MDT, and MT SHPO that will be used by the FAA in consultation with the other Signatories to assess effects of the undertaking on the NPNHT and Nez Perce Tribe. The executive report will omit any sensitive cultural information that is not appropriate for public release, as agreed by the FAA, USFS, MT SHPO, and the Nez Perce. The executive report may also be used to develop interpretive displays and educational material. Any educational, interpretive, or other materials developed from the ethnographic study will be accomplished in collaboration with, and approval of, the Nez Perce Tribe. The development of such materials is outside the scope of this PA unless stipulated as mitigation in accordance with Stipulation I(C).

I. If the Nez Perce Tribe recommends a finding of adverse effect due to the undertaking upon the NPNHT and/or the Nez Perce Tribe based on the ethnographic study, adequate information must be released to the FAA as determined by the FAA and MT SHPO to evaluate the recommendation and make a finding if the executive report is not adequate to support an adverse effect finding.

J. Unless otherwise agreed to by the Signatories (FAA, USFS, MDT, MT SHPO, or Nez Perce Tribe) or stated in this PA, Signatories shall have 30 calendar days to respond to a
request to review any activities associated with the accomplishment of this PA (such as the review of documents), from receipt of a formal request for review. The FAA shall make reasonable attempts to contact the Signatories to confirm that the party has elected not to comment or agrees with the course of action proposed by the FAA. “Reasonable attempts” include contacting office staff, management, or the Tribal Chairperson by email with a follow-up phone call. Where the time period for review or comment (30 days) has passed that included such reasonable attempts, the FAA may assume that the Consulting Party has elected not to comment and may proceed with the course of action proposed.

K. As lead agency for NEPA, Section 106 compliance, and Government to Government consultation, the FAA will make the final determination of effects after the ethnographic study is completed and after consultation with the Nez Perce, USFS, MDT, and MT SHPO in accordance with 36 CFR § 800.5-7.

III. ETHNOGRAPHIC STUDY
A. Scope: an ethnographic study will be conducted with the elders of the Nez Perce Tribe, archive searches, and other sources in order to gather oral history and information regarding the Nez Perce War of 1877 on what is now known as the NPNHT in the Hebgen Basin as the Tribe entered the area of what is now known as Yellowstone National Park as they were pursued by the US Army.
1. Consideration will be given to any aspect of the study which may have bearing on physical remains that could be encountered in or near the APE for the utility improvements that will cross the Custer Gallatin National Forest between the town of West Yellowstone and WYS – i.e: camp sites, prayer sites, sites of conflicts or skirmishes with the US Army, etc.
2. Consideration will also be given to any impact that the utility improvements on the Custer Gallatin National Forest may have that would be unique to the NPNHT or the Nez Perce Tribe– i.e: visual impact, cultural impact, etc.
3. The ethnographic study is expected to be completed within one year after a contract for completion of the study has been signed.
B. An executive report in accordance with Stipulation II(H) will be produced from the ethnographic study, which will include a summary of techniques employed for the ethnographic study, summary of the study itself (omitting any sensitive cultural information that is not appropriate for public release), and recommendation of effect due to the undertaking’s actions on the NPNHT and Nez Perce Tribe.
C. The individual, or individuals overseeing information gathered from the ethnographic study will meet the Secretary of the Interior’s Professional Qualification Standards (36 CFR Part 61 Appendix A).

IV. ASSESSMENT OF EFFECTS
A. Once the ethnographic study has been completed, the individual, or individuals responsible for overseeing the ethnographic study, will submit an executive report in accordance with Stipulation II(H) to the FAA, USFS, MDT, and MT SHPO. These Signatories will be allowed a thirty (30) day review period in which the FAA will lead consultation in accordance with 36 CFR § 800.5-7 prior to making a final determination of effects. The assessment of effects will be based upon:
1. Compliance with Section 106 of the NHPA in accordance with 36 CFR § 800.5, which state that an adverse effect is found when an undertaking alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling or association. Impacts to the NPNHT could include, but are not limited to:
   a) Physical destruction or damage, alteration, change of character, or change of
      the use or physical features of the NPNHT; or
   b) Introduction of visual, atmospheric, or audible elements that diminish the
      integrity of the significant historic features of the NPNHT; or
   c) Introduction of physical, visual, atmospheric, or audible elements that impact
      the qualities of the NPNHT that are significant to the Nez Perce Tribe, which
      recognizes the NPNHT as a memorial to Nez Perce Tribal members lost
      during the Nez Perce War of 1877.

2. Compliance with Executive Order 13175, Consultation and Coordination with Indian
   Tribal Governments, which directs Federal agencies to consult with tribal
   governments regarding issues which significantly or uniquely affect their
   communities.
   a) The undertaking will be assessed to determine any effects upon the Nez
      Perce Tribe or individual members of the Nez Perce due to the traumatic and
      significant events of 1877 that may have lasting effects upon Tribal members.
   b) Impacts from such effects will be limited to the scope intended to be
      addressed within this PA as explained in Stipulation III(A).

B. If, after consultation, the FAA determines that there will be no effect to the NPNHT or
   the Nez Perce Tribe (i.e: no historic properties affected), the FAA will document this
   finding, proceed with construction of the utility installation for water and fiber optic
   from the town of West Yellowstone as proposed, and provide documentation to the MT
   SHPO according to 36 CFR §800.4.

V. MITIGATION OF ADVERSE EFFECTS
   A. If the NPNHT, Nez Perce Tribe, or Tribal members will be adversely affected per the
      evaluation described in Stipulation IV, the FAA and USFS shall consult with the Nez Perce
      Tribe in accordance with 36 CFR § 800.6(a) to identify appropriate measures to avoid,
      minimize or mitigate adverse effects following notification of an “adverse effect”
      determination.
      1. If an adverse effect is identified according to the criteria under 36 CFR § 800.5(a), a
         finding of no adverse effect may still be determined if the undertaking can be
         modified or conditions imposed in accordance with 36 CFR § 800.5(b) to avoid
         adverse effects.
   B. As stated in Stipulation I(C), if adverse effects are identified that cannot be mitigated,
      minimized, or avoided for a finding of no adverse effect, the Signatories of this PA will
      execute an MOA to document the exact requirements of any mitigation of adverse
      effects.
VI. MONITORING AND REPORTING

Each quarter following the execution of this PA until it expires or is terminated, the Nez Perce Tribe shall provide the FAA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in the Nez Perce Tribe’s efforts to carry out the terms of this PA. This report will be due within 30 days after the end of each quarter (due by January 30, April 30, July 30, October 30). Upon receipt, the FAA will distribute the summary to the USFS, MDT, and MT SHPO.

VII. MONITORING DURING CONSTRUCTION

A cultural resource monitor meeting professional qualification standards for Archaeology defined in the Secretary of the Interior’s Professional Qualification Standards (PQS) for archaeology (48 FR 44739) will be provided the opportunity to be onsite during ground disturbing activities for utility installation and timber removal for the water and fiber optic lines from West Yellowstone to WYS.

A. Funding for the monitor will be provided through applicable sources from the FAA, USFS, and MDT as part of construction costs of the utility installation and timber removal for the water and fiber optic lines from West Yellowstone to WYS, pending successful completion of the NEPA process and issuance of a decision document for the undertaking under NEPA.

B. The Nez Perce Tribe will be provided an opportunity to fill this position. If accepted, the Nez Perce Tribe will be notified at least two months before construction is scheduled to commence and provided a construction schedule of ground disturbing activities at least one week in advance of such activities.

VIII. POST-REVIEW DISCOVERIES

If the proposed project activities encounter a previously unknown cultural resource, or if project activities directly or indirectly affect a known resource in an unanticipated manner, the FAA shall implement the Plan for Discovery of Unanticipated Cultural Resources included in Appendix B of this PA.

IX. DISCOVERY OF HUMAN REMAINS

If construction or other project personnel identify what they believe to be human remains, they will immediately halt construction at that location and notify the county coroner per the provisions of Montana’s Human Skeletal Remains and Burial Site Protection Act (22-3-801 et seq. MCA) and the Native American Graves Protection and Repatriation Act (NAGPRA) (if the discovery is on Federal land). The coroner has two (2) working days to determine if the remains represent a crime scene or if the remains must be removed in order to determine if they are a crime scene. No one else has the authority to make this determination or remove any evidence or remains. The coroner should make every reasonable effort to accomplish the determination without disturbing the remains. If the coroner determines that the remains are not a crime scene:

A. If the human remains are found on private or state property, then the coroner must notify the MT SHPO of the findings within 24 hours. The MT SHPO will notify the State Burial Board, the landowner (if this has not already occurred), and Tribes (as appropriate). The Board or its duly appointed representative will determine, in concert
with the landowner, an appropriate disposition of the remains. Once the Board has made that determination, the Board will authorize commencement of work or outline other arrangements.

B. If the human remains are found on federal property, the federal agency will follow NAGPRA guidelines and notify the appropriate Tribes.

X. DURATION

This PA will expire if its terms are not carried out within (5) years from the date of its execution. Prior to such time, the FAA may consult with the other signatories to reconsider the terms of the PA and amend it in accordance with Stipulation XII below.

XI. DISPUTE RESOLUTION

Should any signatory to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented, the FAA shall consult with such party to resolve the objection. If the FAA determines that such objection cannot be resolved, the FAA will:

A. Forward all documentation relevant to the dispute, including the FAA’s proposed resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. The FAA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FAA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the PA, and provide them and the ACHP with a copy of such written response.

C. The FAA’s responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

XII. AMENDMENTS

This PA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

XIII. TERMINATION

A. If any signatory to this PA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation XII, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the PA upon written notification to the other signatories.

B. Once the PA is terminated, and prior to work continuing on the undertaking, the FAA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) execute a PA pursuant to 36 CFR § 800.14 or (c) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. The FAA shall notify the signatories as to the course of action it will pursue.
C. Execution of this PA and implementation of its terms evidence that the FAA and USFS have taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

UNITED STATES OF AMERICA
FEDERAL AVIATION ADMINISTRATION

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Steve Engebrecht, Acting Manager
Helena Airports District Office

UNITED STATES OF AMERICA
FOREST SERVICE

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Kathleen Minor, Acting Forest Supervisor
Custer Gallatin National Forest

MONTANA STATE HISTORIC PRESERVATION OFFICE

Pete Brown
State Historic Preservation Officer

NEZ PERCE TRIBE

Shannon F. Wheeler, Chairman
Nez Perce Tribe

STATE OF MONTANA—DEPARTMENT OF TRANSPORTATION

Tim Conway
Administrator, Aeronautics Division

APPROVED FOR LEGAL CONTENT

Carol Grell Morris 3/30/21
APPENDIX A

TO THE PROGRAMMATIC AGREEMENT REGARDING THE PROPOSED CONSTRUCTION OF A NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

Project Layouts and Area of Potential Effect (APE)
Area of Potential Effect (APE) shown by Orange line

Covers areas of terminal area and areas of disturbance for utility improvements
Area of Potential Effect (APE) shown by Orange line

Covers areas of terminal area and areas of disturbance for utility improvements

The area surrounded by the purple line outlines the area associated with water and fiber optic improvements on National Forest land.
Plan for Discovery of Unanticipated Cultural Resources

Cultural resources can be found during any ground-disturbing activity. If a monitor is onsite per Stipulation VII, he/she may determine if the discovery should trigger the procedures described in this document. If no monitor is onsite, all excavation and work in the area must stop, and the procedures as described below must be followed. If in doubt, follow the procedures outlined in this document. Unanticipated discoveries can vary and include evidence or remnants of historic-era and precontact activities by humans. Cultural resources can include, but are not limited to:

- Stone flakes, arrowheads, stone tools, bone or wooden tools, baskets, beads.
- Historic building materials such as nails, glass, metal such as cans, barrel rings, farm implements, ceramics, bottles, marbles, beads.
- Layers of discolored earth resulting from hearth fire
- Structural remains such as foundations
- Shell Middens
- Human skeletal remains and/or bone fragments which may be whole or fragmented.

In the event that previously unknown cultural resources are discovered within the Area of Potential Effects from construction activities of the undertaking, or should those activities directly or indirectly impact known historic properties in an unanticipated manner, the following actions, at a minimum, will be initiated by the FAA, or a representative duly authorized to perform these tasks:

1. All activities will halt in the immediate vicinity of the discovery and all actions that might adversely affect the property will be redirected to an area at least 200 feet from the point of discovery.

2. The FAA and Montana Department of Transportation – Aeronautics Division (MDT) will be notified immediately (within 24 hours), and the FAA will notify MT SHPO and any Indian tribe that might attach religious and cultural significance to the affected property.

   a. If not already onsite, a professional archaeologist who meets the Secretary of the Interior’s qualifications (36 CFR Part 61) will be called in within 48 hours to assess the discovery.
3. Upon arriving at the site of the discovery, the professional archaeologist shall assess the resource. The assessment shall include:

a. The nature of the resource (e.g., number and kinds of artifacts, presence/absence of features). This may require screening of already disturbed deposits, photographs of the discovery, Global Positioning System (GPS) data, and other necessary documentation. The archaeologist will have basic archaeological excavation tools on hand.

b. The spatial extent of the resource. This may require additional subsurface examination, mapping or inspection, as is appropriate to the resource

c. The nature of deposition/exposure. This may require interviews with construction personnel and with other persons having knowledge about the resource or the expansion of existing disturbance to establish the characteristics of the deposits.

4. The professional archaeologist will complete a brief summary of the assessment and submit the report to the FAA, USFS, MDT, the Nez Perce Tribe (due to the proximity of the NPNHT), and the MT SHPO within 10 days of fieldwork for further instruction. The FAA will also notify any Indian Tribe that might attach religious and cultural significance to the affected property.

5. The FAA will consult with the USFS, MT SHPO, MDT, and any Indian tribe that might attach religious and cultural significance to the affected property to determine if and when construction activities in the location of the discovery may resume.

6. After consultation, the FAA will issue appropriate determinations of eligibility of any resources discovered and a determination of effect before construction in the location of the discovery may resume. Consistent with 36 CFR § 800.13(b)(3) (Post-review discoveries) Tribes and MT SHPO will have 72 hours to respond to the determinations.

7. If unanticipated discoveries are made on the undertaking, a technical report will be written at the end of the project by the on-site professional archaeologist and will be submitted within four months to the MT SHPO by the FAA. Reports dealing with sensitive information regarding sacred areas or other similar resources of historical or cultural importance to Native Americans will be reviewed only by those who have responsibility for National Register eligibility determinations or management concerns of such properties.

8. Report and documentation efforts shall conform with the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation (48 FR. 44716-44740), as well as with all applicable standards, guidelines, and forms for historic preservation, including Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey (HABS/HAER/HALS) guidance, and guidance established by the MT SHPO.

9. If the unanticipated discoveries may be related to the Nez Perce (Nee-Me-Poo) National Historic Trail, the Nez Perce Tribal Historic Preservation Officer will be notified and the Programmatic Agreement relating to ethnographic study will be reviewed for applicability. The FAA will also notify any other Indian Tribe that might attach religious and cultural significance to the affected property.
10. Points of Contact:

FAA: Diane Stilson, HLN ADO - (406) 441-5411
MDT: Jeff Kadlec, Yellowstone Airport Manager - (406) 459-9825
MT SHPO: Jessica Bush, State Archaeologist – (406) 444-0388
Nez Perce Tribe: Patrick Baird, Tribal Historic Preservation Officer - (208) 791-8610
ASBESTOS AND LEAD-PAINT INSPECTION REPORTS
ASBESTOS INSPECTION REPORT
FOR
AIRPORT TERMINAL & GENERATOR BUILDING

YELLOWSTONE AIRPORT TERMINAL &
GENERATOR BUILDING
West Yellowstone, Montana

Report Requested By:
MORRISON-MAIERLE, INC.

DATE OF INSPECTION: 11/03/16
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Credentials

Authored By:  

Sonia Rogers, IH

Reviewed By:  

Scott Rogers, CIH, CHMM

Asbestos Certifications:

<table>
<thead>
<tr>
<th>Name</th>
<th>MTA #</th>
<th>Inspector</th>
<th>Contractor / Supervisor</th>
<th>Project Designer</th>
<th>Management Planner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scott Rogers, CIH CSP CHMM</td>
<td>2322</td>
<td>09/07/2017</td>
<td>09/06/2017</td>
<td>09/08/2017</td>
<td>09/07/2017</td>
</tr>
<tr>
<td>Sonia Rogers, IH</td>
<td>3150</td>
<td>09/07/2017</td>
<td>09/06/2017</td>
<td>09/08/2017</td>
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</tr>
<tr>
<td>Darrell Freeland</td>
<td>3892</td>
<td>01/29/2017</td>
<td>01/28/2017</td>
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INTRODUCTION

Sonia Rogers and Scott Rogers of Environmental Solutions LLC performed a comprehensive full building asbestos inspection on November 3, 2016, of the Yellowstone Airport Terminal & Generator Building located at 721 Airport Road, West Yellowstone, Montana. This evaluation was performed at the request of Travis Eickman, PE for Morrison-Maierle, Inc., Bozeman, Montana.

The Yellowstone Airport Terminal Building constructed between the years of 1963-68, is a single story structure over a partial basement and partial concrete slab. The building is constructed of CMU, concrete and rock walls with a flat built-up roof. The terminal received major renovations in 1986 and 1987 which also included a complete replacement of the roof. In the past 30 years the terminal has received many small scale renovations.

The Generator Building was constructed in 1980. The building is a single story CMU and concrete structure with a flat rock, tar and asphalt roof.

The intent of this report is to properly identify the presence of asbestos containing materials that will be impacted during upcoming renovation projects.

This report and its recommendations are pursuant to the NESHAP requirements (40 CFR 61.145) and the Administrative Rules of Montana (17.74.307) as administered by the Montana Department of Environmental Quality, Asbestos Control Program.

The regulations require the building owner to have the facility inspected for the presence of asbestos containing material(s) (ACM) prior to the construction, renovation or demolition of the facility. The owner is required to provide information obtained from the inspection to those who may be impacted such as, but not limited to, contractors, sub-contractors and/or employees. ARM 17.74.307 requires that the inspection be conducted by a Montana Accredited Inspector.

INSPECTION PROCEDURES

The inspection was conducted by our accredited inspectors, Sonia Rogers and Scott Rogers and consisted of a visual survey of the buildings. Following a brief review, the inspectors entered the buildings with sampling equipment and began to assess the homogenous areas. Suspect ACBM was then grouped into homogenous materials and a sampling plan was developed and materials were collected.

In the Terminal Building inspectors determined that 21 homogeneous materials were present and collected 59 representative samples from these materials. Two (2) of the 21 materials were found to contain asbestos quantities greater than 1% (9x9 Floor Tile w/Mastic and Ext. Roof Tar/Asphalt Sealant). One (1) material was found to contain asbestos quantities of a trace or less than 1% (12x12 Tile Glue). Zero (0) materials were assumed to contain quantities greater than 1%.

In the Generator Building inspectors determined that 3 homogeneous materials were present and collected 7 representative samples from these materials. One (1) of the 3 materials was found to contain asbestos quantities greater than 1% (Tar/Asphalt Roofing). Zero (0) materials were found to
contain asbestos quantities of a trace or less than 1%. Zero (0) materials were assumed to contain quantities greater than 1%.

See the Inspection Summary for a more detailed description and location of materials sampled.

Materials were collected wet to avoid dust generation and placed into Ziploc bags for transport. The materials were submitted to EMSL Laboratories, Raleigh, North Carolina. EMSL is an “accredited” laboratory under the National Voluntary Laboratory Accreditation Program (NVLAP), Laboratory Code #200671-0, which employs Polarized Light Microscopic (PLM) techniques with dispersion staining for identification of mineral forms of asbestos. The quantification of asbestos in the sample is intended to be an estimate only and the limit of detection for this method is approximately 1% by volume.

Bulk samples obtained during the inspection were assigned bulk sample numbers and entered on the sample summary / chain of custody forms. The samples were transported to the laboratory via Fed-Ex (Standard Overnight).

Sample locations for this survey were chosen in a random fashion, with emphasis placed on obtaining samples of each type of accessible, suspect material and minimizing damage to the material being sampled. Samples were collected by carefully removing small portions of the suspect material in a non-invasive manner, when possible. If possible, samples from existing damaged areas or loose pieces of material were collected.

The intent of the inspection was to identify the suspect materials, assume that materials contain asbestos or collect samples of materials to determine if they are ACM and assess the friability of the materials. Materials that were assumed to contain asbestos or that were identified as containing greater than 1% asbestos were categorized as a regulated asbestos containing material (RACM), Category I Non-Friable ACM, Category I RACM or Category II Non-Friable ACM based on the type and the condition of the material.

**Sample analysis results are included in Appendix B and Chain of Custody documents are included in Appendix C.**
# ENVIRONMENTAL SOLUTIONS INSPECTION SUMMARY

<table>
<thead>
<tr>
<th>SAMPLE ID</th>
<th>SAMPLE DESCRIPTION</th>
<th>SAMPLE COLOR</th>
<th>APPROX SQ/FT</th>
<th>MATERIAL DESIGNATION</th>
<th>LAB RESULTS</th>
<th>MATERIAL LOCATIONS</th>
<th>RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>01, 02, 03</td>
<td>12x12 Floor Tile w/Glue</td>
<td>Tan w/Specs</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected &amp; &lt;1% Chrysotile</td>
<td>Middles Section of Kitchen</td>
<td>*See Flooring Notes Below</td>
</tr>
<tr>
<td>04, 05, 06</td>
<td>12x12 Floor Tile w/Glue</td>
<td>Tan Muddled</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Serving Prep Area</td>
<td>*See Flooring Notes Below</td>
</tr>
<tr>
<td>07, 08, 09</td>
<td>1’x18” Engineered Floor Tiles</td>
<td>Light Tan</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Vending Machine Area</td>
<td>*See Flooring Notes Below</td>
</tr>
<tr>
<td>10, 11, 12</td>
<td>Drywall / Mud / Tape</td>
<td>White /Paint</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Interior of Terminal</td>
<td></td>
</tr>
<tr>
<td>13, 14, 15</td>
<td>Rock Wall Mortar</td>
<td>Gray</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Interior of Terminal</td>
<td></td>
</tr>
<tr>
<td>16, 17, 18</td>
<td>Heavy Ceiling Texture</td>
<td>White</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Hallway of Restaurant Area</td>
<td></td>
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<tr>
<td>19, 20, 21</td>
<td>4x4 Ceramic Tile &amp; Grout</td>
<td>White</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Men’s &amp; Women’s Restrooms</td>
<td></td>
</tr>
<tr>
<td>22, 23, 24</td>
<td>Blown-In Insulation</td>
<td>White</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Interior Terminal Ceilings</td>
<td></td>
</tr>
<tr>
<td>25, 26, 27</td>
<td>Plaster</td>
<td>Gray</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Behind Blown-In Insulation</td>
<td></td>
</tr>
<tr>
<td>28, 29, 30</td>
<td>CMU Block</td>
<td>Gray w/Paint</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Terminal Walls</td>
<td></td>
</tr>
<tr>
<td>31, 32, 33</td>
<td>CMU Block Mortar</td>
<td>Gray w/Paint</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Terminal Walls</td>
<td></td>
</tr>
<tr>
<td>34, 35, 36</td>
<td>Concrete</td>
<td>Gray</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Foundation &amp; Slab</td>
<td></td>
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<tr>
<td>37, 38, 39</td>
<td>Interior Mortar</td>
<td>Gray</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Between Metal Windows and Rock Walls</td>
<td></td>
</tr>
</tbody>
</table>
## ENVIRONMENTAL SOLUTIONS INSPECTION SUMMARY

<table>
<thead>
<tr>
<th>SAMPLE ID</th>
<th>SAMPLE DESCRIPTION</th>
<th>SAMPLE COLOR</th>
<th>APPROX SQ/FT</th>
<th>MATERIAL DESIGNATION</th>
<th>LAB RESULTS</th>
<th>MATERIAL LOCATIONS</th>
<th>RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>40, 41, 42</td>
<td>Exterior Caulk</td>
<td>White</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Roof – Around Edges</td>
<td></td>
</tr>
<tr>
<td>43, 44, 45</td>
<td>Exterior Asphalt Tar/Sealant</td>
<td>Black</td>
<td>7 Caps</td>
<td>Category I Non-Friable</td>
<td>10% Chrysotile</td>
<td>Used on Exterior Roof Caps as Sealant</td>
<td>Impact of this asbestos containing material is regulated by both environmental and worker protection regulations. Asbestos accredited persons must perform all work impacting, disturbing, or requiring the removal of this material following regulatory requirements.</td>
</tr>
<tr>
<td>46, 47, 48</td>
<td>Exterior Window Caulk</td>
<td>White</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Between Metal Windows and Rock Walls</td>
<td></td>
</tr>
<tr>
<td>49</td>
<td>Interior Paint</td>
<td>White</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Stairwell to Basement Painted on Concrete</td>
<td></td>
</tr>
<tr>
<td>C-01</td>
<td>Exterior Roof Core</td>
<td>White Multi</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Terminal Roof</td>
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### Terminal Building Analytical Information From 10/21/14 Partial Inspection

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<thead>
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<th>SAMPLE ID</th>
<th>SAMPLE DESCRIPTION</th>
<th>SAMPLE COLOR</th>
<th>APPROX SQ/FT</th>
<th>MATERIAL DESIGNATION</th>
<th>LAB RESULTS</th>
<th>MATERIAL LOCATIONS</th>
<th>RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>01, 02, 03</td>
<td>9x9 Floor Tile w/Mastic</td>
<td>White Orange</td>
<td>*See Flooring Notes</td>
<td>Category I Non-Friable</td>
<td>Tile = 2% Chrysotile Mastic = 2-5% Chrysotile</td>
<td>*See Flooring Notes Below</td>
<td>Renovation that requires the removal of the floor tiles and/or mastic must include the abatement of the materials and must be performed by a Montana accredited asbestos abatement contractor according to local, state, and federal regulations.</td>
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<tr>
<td>04, 05, 06</td>
<td>4” Rubber Base Molding</td>
<td>Dark Brown</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Throughout Terminal Building</td>
<td></td>
</tr>
<tr>
<td>07, 08, 09</td>
<td>4” Rubber Base Molding Glue</td>
<td>Brown</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Throughout Terminal Building</td>
<td></td>
</tr>
</tbody>
</table>
### ENVIRONMENTAL SOLUTIONS INSPECTION SUMMARY

<table>
<thead>
<tr>
<th>SAMPLE ID</th>
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<th>SAMPLE COLOR</th>
<th>APPROX SQ/FT</th>
<th>MATERIAL DESIGNATION</th>
<th>LAB RESULTS</th>
<th>MATERIAL LOCATIONS</th>
<th>RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>50, 51, 52</td>
<td>Concrete</td>
<td>Gray</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Floor / Slab</td>
<td>N/A</td>
</tr>
<tr>
<td>53, 54, 55</td>
<td>CMU</td>
<td>Gray</td>
<td>N/A</td>
<td>N/A</td>
<td>None Detected</td>
<td>Walls</td>
<td>N/A</td>
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<tr>
<td>56</td>
<td>Exterior Roof</td>
<td>Black</td>
<td>200</td>
<td>Category I Non-Friable</td>
<td>None Detected &amp; 10% Chrysotile</td>
<td>Roof (Flat)</td>
<td>Impact of this asbestos containing material is regulated by both environmental and worker protection regulations. Asbestos accredited persons must perform all work impacting, disturbing, or requiring the removal of this material following regulatory requirements.</td>
</tr>
</tbody>
</table>

**Materials containing >1% Asbestos**

**Materials of Note – Containing Trace Amounts of Asbestos**

### ENVIRONMENTAL SOLUTIONS INSPECTION SUMMARY

#### TERMINAL BUILDING

*Flooring NOTE:* See floor plans located in Appendix D for location of asbestos containing flooring materials. There are positive 9x9 floor tiles and positive mastic throughout the airport terminal. In a large portion of the terminal the 9x9 Floor Tiles and Mastic is the only layer and are on the original concrete slab. However, there are portions of the terminal where the 9x9 Floor Tiles and Mastic have been covered up with new flooring materials. There is also two areas where a 2-3” layer of concrete has been poured on top of the 9x9 Floor Tiles and Mastic. There are also areas where the 9x9 Floor Tile have been removed but the black mastic still remains under the new flooring materials.

<table>
<thead>
<tr>
<th>TYPE OF FLOORING</th>
<th>LOCATION</th>
<th>ESTIMATED SQ/FT</th>
</tr>
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<tbody>
<tr>
<td>2-3” Concrete over 9x9 Floor Tiles w/Mastic</td>
<td>South section of the terminal, the hallway, dining area and serving prep area</td>
<td>1,100</td>
</tr>
<tr>
<td>Engineered Flooring over 9x9 Floor Tiles w/Mastic</td>
<td>Vending Machine Area, Second Floor Office Area #4 (includes Kitchen Area and Bathroom/Shower Area)</td>
<td>850</td>
</tr>
<tr>
<td>12x12 Floor Tiles over Black Mastic</td>
<td>Kitchen (Middle Section)</td>
<td>300</td>
</tr>
<tr>
<td>Carpet over 9x9 Floor Tiles w/Mastic</td>
<td>Under Stairs going up to south section of mezzanine area</td>
<td>15</td>
</tr>
<tr>
<td>Carpet Tiles over Black Mastic</td>
<td>Airport Managers Office &amp; Office Area #3 (mezzanine area)</td>
<td>600</td>
</tr>
<tr>
<td>9x9 Floor Tiles w/Mastic</td>
<td>Main Lobby Area, Back Kitchen Area, Hallway, Secure Passenger Area, Rental Car Area, Misc. Area, Office Area #’s 1,2 &amp; 5, Storage Area, Delta Counter and Pilot Lounge Area.</td>
<td>6,600</td>
</tr>
</tbody>
</table>

Estimated floor quantities are to be verified for exact numbers.

**TSI NOTE:** No asbestos containing TSI Fittings or Straight Runs were identified in areas that were accessible and visible during our inspection. Given the age of the terminal building it is our opinion that TSI fittings maybe located in vertical pipe chases and buried in the walls that were not accessible or visible. Care should be taken when opening any enclosed spaces. IF, TSI materials are identified, that are not fiberglass, care should be taken not to disturb the materials until they can be inspected and sampled for asbestos.
DISCLAIMERS

This document and its contents incorporated herein, is proprietary information and as an instrument of professional services, is the property of Environmental Solutions LLC, and are not to be used, in part or in whole for any other project without the written authorization of Environmental Solutions LLC.

This asbestos assessment report was prepared based on information obtained during the surveys, interpretation of the laboratory results of bulk samples of building materials collected during the surveys. The conclusions of this report are professional opinions based solely upon visual site observations and interpretations of laboratory analysis and field data as described in our report.

This report has been prepared to provide information concerning the various types and estimated quantities of asbestos-containing materials that will be impacted during upcoming renovations. While extreme effort was made to inspect every aspect of the buildings, it still includes only those materials that were visible and accessible at the time of our inspection.

Our opinions are intended exclusively for use by Yellowstone Airport and Morrison-Maierle Inc. The scope of services performed by Environmental Solutions LLC may not be appropriate to satisfy the needs of other users, and any use or re-use of this document, or the findings presented herein, is at the sole risk of the user.

The opinions presented herein apply to the site conditions existing at the time of our investigation. Therefore, our opinions and recommendations may not apply to future conditions that may exist at the site, which we have not had the opportunity to evaluate.
APPENDIX A
PHOTOGRAPHS OF SAMPLES - Terminal

12x12 Floor Tile w/Glue

12x12 Floor Tile w/Glue

1’x18” Engineered Flooring

Drywall / Mud / Tape

Rock Wall Mortar

Heavy Ceiling Texture
APPENDIX A
PHOTOGRAPHS OF SAMPLES - Terminal

4x4 Ceramic Tiles & Grout

Blown-In Insulation (Ceiling)

Plaster Like Material Under Blown-In Insulation

CMU Blocks & Mortar

Interior Mortar Between Rock Wall & Window

Exterior Roof Caulk
APPENDIX A
PHOTOGRAPHS OF SAMPLES - Terminal

Roof Caps – Tar/Asphalt Sealant
Ext. Window Caulk-Between Rocks and Windows
Interior Paint on Concrete
Roofing Materials – Void from Core

9x9 Floor Tiles w/Mastic
4” Rubber Base w/Glue
APPENDIX A
PHOTOGRAPHS OF SAMPLES - Terminal

Diagram of Flooring with Poured Concrete

- Carpet & Glue
- 2-3” of Concrete
- 9x9 Floor Tile w/Mastic
- Original Concrete Floor

Airport Terminal Building
APPENDIX A
PHOTOGRAPHS OF SAMPLES – Generator Building

Small Generator Building

Concrete

CMU

Roof – Rock / Tar / Asphalt
APPENDIX B

Sample Analysis Report by
EMSL Raleigh, NC Laboratory
<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>Non-Asbestos</th>
<th>% Non-Fibrous</th>
<th>Asbestos % Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>01-Floor Tile</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Beige Non-Fibrous Homogeneous</td>
<td>&lt;1% Cellulose</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>01-Glue</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Brown Fibrous Homogeneous</td>
<td>5% Cellulose</td>
<td>95% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>02-Floor Tile</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Beige Non-Fibrous Homogeneous</td>
<td>&lt;1% Cellulose</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>02-Glue</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Brown/Tan Fibrous Homogeneous</td>
<td>3% Cellulose</td>
<td>97% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>03-Floor Tile</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>White/Beige Non-Fibrous Homogeneous</td>
<td></td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>03-Glue</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Brown/Tan Fibrous Homogeneous</td>
<td>5% Cellulose</td>
<td>95% Non-fibrous (Other)</td>
<td>&lt;1% Chrysotile</td>
<td></td>
</tr>
<tr>
<td>04-Floor Tile</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Tan/Beige Fibrous Homogeneous</td>
<td>2% Cellulose</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>04-Glue</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Tan Fibrous Homogeneous</td>
<td>3% Cellulose</td>
<td>97% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>05-Floor Tile</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Tan/Beige Fibrous Homogeneous</td>
<td>2% Cellulose</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
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</tr>
<tr>
<td>05-Glue</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Tan Fibrous Homogeneous</td>
<td>5% Cellulose</td>
<td>95% Non-fibrous (Other)</td>
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<tr>
<td>06-Floor Tile</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Brown/Tan Fibrous Homogeneous</td>
<td>2% Cellulose</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>06-Glue</td>
<td>12x12 Floor Tile w/ Glue</td>
<td>Tan Fibrous Homogeneous</td>
<td>3% Cellulose</td>
<td>97% Non-fibrous (Other)</td>
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<td>07</td>
<td>Engineered Floor Tiles</td>
<td>Tan/Black Fibrous Homogeneous</td>
<td>2% Cellulose</td>
<td>93% Non-fibrous (Other)</td>
<td>None Detected</td>
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<td>08</td>
<td>Engineered Floor Tiles</td>
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<td>2% Cellulose</td>
<td>93% Non-fibrous (Other)</td>
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<td>09</td>
<td>Engineered Floor Tiles</td>
<td>Tan/Black Fibrous Homogeneous</td>
<td>2% Cellulose</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
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</tr>
<tr>
<td>10-Drywall</td>
<td>Drywall/Mud/Tape</td>
<td>Brown/Gray Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>80% Non-fibrous (Other)</td>
<td>None Detected</td>
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</tr>
</tbody>
</table>

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous (Other)</th>
<th>Asbestos % Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>10-Mud</td>
<td>Drywall/Mud/Tape</td>
<td>Tan, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
</tr>
<tr>
<td>10-Tape</td>
<td>Drywall/Mud/Tape</td>
<td>White, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
</tr>
<tr>
<td>11-Drywall</td>
<td>Drywall/Mud/Tape</td>
<td>Brown/Gray, Fibrous</td>
<td>15% Cellulose, 5% Glass</td>
<td>80% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>11-Mud</td>
<td>Drywall/Mud/Tape</td>
<td>Tan, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
</tr>
<tr>
<td>11-Tape</td>
<td>Drywall/Mud/Tape</td>
<td>White, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
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<tr>
<td>12-Drywall</td>
<td>Drywall/Mud/Tape</td>
<td>White, Fibrous</td>
<td>20% Cellulose, 2% Glass</td>
<td>78% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>12-Mud</td>
<td>Drywall/Mud/Tape</td>
<td>White, Fibrous</td>
<td>2% Wollastonite</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>12-Tape</td>
<td>Drywall/Mud/Tape</td>
<td>White, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
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<tr>
<td>13</td>
<td>Rock Wall Mortar</td>
<td>Gray/Red, Fibrous</td>
<td>2% Cellulose, &lt;1% Glass</td>
<td>98% Non-fibrous (Other)</td>
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</tr>
<tr>
<td>14</td>
<td>Rock Wall Mortar</td>
<td>Gray/Red, Fibrous</td>
<td>2% Cellulose, &lt;1% Glass</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>15</td>
<td>Rock Wall Mortar</td>
<td>Brown/Gray, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
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<tr>
<td>16</td>
<td>Heavy Ceiling Texture</td>
<td>Beige, Fibrous</td>
<td>3% Cellulose</td>
<td>97% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>17</td>
<td>Heavy Ceiling Texture</td>
<td>Beige, Fibrous</td>
<td>3% Cellulose</td>
<td>97% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>18</td>
<td>Heavy Ceiling Texture</td>
<td>White, Fibrous</td>
<td>2% Cellulose</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>19-Ceramic Tile</td>
<td>4x4 Ceramic Tiles &amp; Grout</td>
<td>Beige, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
</tr>
<tr>
<td>19-Grout</td>
<td>4x4 Ceramic Tiles &amp; Grout</td>
<td>White, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
</tr>
<tr>
<td>20-Ceramic Tile</td>
<td>4x4 Ceramic Tiles &amp; Grout</td>
<td>Yellow/Beige, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
</tr>
<tr>
<td>20-Grout</td>
<td>4x4 Ceramic Tiles &amp; Grout</td>
<td>White, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
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<tr>
<td>21-Ceramic Tile</td>
<td>4x4 Ceramic Tiles &amp; Grout</td>
<td>Beige, Non-Fibrous</td>
<td>100%</td>
<td>0%</td>
<td>None Detected</td>
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</tbody>
</table>

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>Non-Asbestos</th>
<th>Non-Fibrous</th>
<th>Asbestos</th>
</tr>
</thead>
<tbody>
<tr>
<td>21-Grou</td>
<td>4x4 Ceramic Tiles &amp; Grout</td>
<td>White</td>
<td>2% Wollastonite</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>22</td>
<td>Insulation</td>
<td>White</td>
<td>85% Cellulose</td>
<td>15% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>23</td>
<td>Insulation</td>
<td>White</td>
<td>85% Cellulose</td>
<td>15% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>24</td>
<td>Insulation</td>
<td>White</td>
<td>85% Cellulose</td>
<td>15% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>25</td>
<td>Plaster</td>
<td>Gray</td>
<td>2% Cellulose</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>26</td>
<td>Plaster</td>
<td>Gray</td>
<td>2% Cellulose</td>
<td>98% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>27</td>
<td>Plaster</td>
<td>Gray</td>
<td>3% Cellulose</td>
<td>97% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>28</td>
<td>CMU Block</td>
<td>Gray</td>
<td>&lt;1% Cellulose</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>29</td>
<td>CMU Block</td>
<td>Gray</td>
<td>&lt;1% Cellulose</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>30</td>
<td>CMU Block</td>
<td>Gray</td>
<td>100% Non-fibrous (Other)</td>
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<tr>
<td>31</td>
<td>CMU Block Mortar</td>
<td>Gray</td>
<td>&lt;1% Cellulose</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>32</td>
<td>CMU Block Mortar</td>
<td>Gray</td>
<td>&lt;1% Cellulose</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>33</td>
<td>CMU Block Mortar</td>
<td>Gray</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>Concrete</td>
<td>Gray</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>35</td>
<td>Concrete</td>
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<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>36</td>
<td>Concrete</td>
<td>White</td>
<td>2% Min. Wool</td>
<td>98% Non-fibrous (Other)</td>
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<tr>
<td>37</td>
<td>Mortar</td>
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<td>38</td>
<td>Mortar</td>
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<td>100% Non-fibrous (Other)</td>
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<tr>
<td>39</td>
<td>Mortar</td>
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<td>&lt;1% Cellulose</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
</tbody>
</table>
# Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous (Other)</th>
<th>Asbestos % Type</th>
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</thead>
<tbody>
<tr>
<td>40</td>
<td>Caulk</td>
<td>Tan/Black</td>
<td>100%</td>
<td>Non-fibrous</td>
<td>None Detected</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-Fibrous Homogeneous</td>
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<tr>
<td>41</td>
<td>Caulk</td>
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<td>Non-fibrous</td>
<td>None Detected</td>
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<tr>
<td></td>
<td></td>
<td>Non-Fibrous Homogeneous</td>
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<tr>
<td>42</td>
<td>Caulk</td>
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<td>100%</td>
<td>Non-fibrous</td>
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<td>Non-Fibrous Homogeneous</td>
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<tr>
<td>43</td>
<td>Asphalt/Tar Sealant</td>
<td>Tan/Black</td>
<td>90%</td>
<td>Non-fibrous</td>
<td>10% Chrysotile</td>
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<td></td>
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<td>Fibrous Homogeneous</td>
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<td>44</td>
<td>Asphalt/Tar Sealant</td>
<td>Tan/Black</td>
<td>90%</td>
<td>Non-fibrous</td>
<td>10% Chrysotile</td>
</tr>
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<td>45</td>
<td>Asphalt/Tar Sealant</td>
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<td>10% Chrysotile</td>
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<tr>
<td>46</td>
<td>Window Caulk</td>
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<td>100%</td>
<td>Non-fibrous</td>
<td>None Detected</td>
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<tr>
<td></td>
<td></td>
<td>Non-Fibrous Homogeneous</td>
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<tr>
<td>47</td>
<td>Window Caulk</td>
<td>Brown/Gray</td>
<td>100%</td>
<td>Non-fibrous</td>
<td>None Detected</td>
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<tr>
<td></td>
<td></td>
<td>Non-Fibrous Homogeneous</td>
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<td>Window Caulk</td>
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<td>100%</td>
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<td>49</td>
<td>Paint</td>
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<td>Fibrous Homogeneous</td>
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<tr>
<td>50</td>
<td>Concrete</td>
<td>Gray/Black</td>
<td>100%</td>
<td>Non-fibrous</td>
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<tr>
<td></td>
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<td>51</td>
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<td>100%</td>
<td>Non-fibrous</td>
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<tr>
<td>52</td>
<td>Concrete</td>
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<td>100%</td>
<td>Non-fibrous</td>
<td>None Detected</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-Fibrous Homogeneous</td>
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<tr>
<td>53</td>
<td>CMU</td>
<td>Gray</td>
<td>100%</td>
<td>Non-fibrous</td>
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<td>Non-Fibrous Homogeneous</td>
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<tr>
<td>54</td>
<td>CMU</td>
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<td>100%</td>
<td>Non-fibrous</td>
<td>None Detected</td>
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<td></td>
<td></td>
<td>Non-Fibrous Homogeneous</td>
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<tr>
<td>55</td>
<td>CMU</td>
<td>Gray/Yellow</td>
<td>100%</td>
<td>Non-fibrous</td>
<td>None Detected</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-Fibrous Homogeneous</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>56-Roofing 1</td>
<td>Roofing Materials</td>
<td>Black</td>
<td>65%</td>
<td>Cellulose</td>
<td>None Detected</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Fibrous Homogeneous</td>
<td></td>
<td>10% Glass</td>
<td></td>
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<tr>
<td>56-Roofing 2</td>
<td>Roofing Materials</td>
<td>Black</td>
<td>25%</td>
<td>Non-fibrous</td>
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<tr>
<td>56-Roofing 3</td>
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<td>30%</td>
<td>Glass</td>
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<td>70% Non-fibrous (Other)</td>
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</tbody>
</table>
**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy**

<table>
<thead>
<tr>
<th>Sample Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous</th>
<th>Asbestos % Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-01-Roof Core 1</td>
<td>Tan/Yellow</td>
<td>Non-Fibrous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>291608241-0057</td>
<td>Non-Fibrous Homogeneous</td>
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<td></td>
</tr>
<tr>
<td>C-01-Roof Core 2</td>
<td>Brown/Black Fibrous</td>
<td>40% Cellulose</td>
<td>15% Perlite 45% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>291608241-0057A</td>
<td>Fibrous Homogeneous</td>
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</tr>
<tr>
<td>C-01-Roof Core 3</td>
<td>Brown Fibrous</td>
<td>40% Cellulose</td>
<td>15% Perlite 45% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>291608241-0057B</td>
<td>Homogeneous</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**Analyst(s)**

Joshua Moorman (23)

Roxsee Stover (53)

Billy Barnes, Asbestos Lab Manager or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%.

Samples analyzed by EMSL Analytical, Inc. Morrisville, NC NVLAP Lab Code 200671-0, VA 3333 000278, WVA LT000296
## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous</th>
<th>% Type</th>
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<tbody>
<tr>
<td>01-Floor Tile</td>
<td>9x9 Floor Tile w/ Mastic</td>
<td>White/Beige Fibrous Homogeneous</td>
<td>3%</td>
<td>95% Non-fibrous (other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>01-Mastic</td>
<td>9x9 Floor Tile w/ Mastic</td>
<td>Black Fibrous Homogeneous</td>
<td>5%</td>
<td>93% Non-fibrous (other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>02-Floor Tile</td>
<td>9x9 Floor Tile w/ Mastic</td>
<td>White/Beige Fibrous Homogeneous</td>
<td>3%</td>
<td>95% Non-fibrous (other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>02-Mastic</td>
<td>9x9 Floor Tile w/ Mastic</td>
<td>Brown/Black Fibrous Heterogeneous</td>
<td>5%</td>
<td>90% Non-fibrous (other)</td>
<td>5% Chrysotile</td>
</tr>
<tr>
<td>03-Floor Tile</td>
<td>9x9 Floor Tile w/ Mastic</td>
<td>White Fibrous Homogeneous</td>
<td>2%</td>
<td>96% Non-fibrous (other)</td>
<td>2% Chrysotile</td>
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<tr>
<td>03-Mastic</td>
<td>9x9 Floor Tile w/ Mastic</td>
<td>Black Fibrous Homogeneous</td>
<td>95% Non-fibrous (other)</td>
<td>5% Chrysotile</td>
<td></td>
</tr>
<tr>
<td>04</td>
<td>4” Rubberbase</td>
<td>Brown Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (other)</td>
<td>None Detected</td>
<td></td>
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<tr>
<td>05</td>
<td>4” Rubberbase Glue</td>
<td>Brown Fibrous Homogeneous</td>
<td>5%</td>
<td>95% Non-fibrous (other)</td>
<td>None Detected</td>
</tr>
</tbody>
</table>

**Analyst(s)**

Anupriya Tyagi (2)  
Essie Spencer (6)

---

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%.

Samples analyzed by EMSL Analytical, Inc. Morrisville, NC NVLAP Lab Code 200671-0, VA 3333 0000278, WVA LT000296

---

Initial report from 10/22/2014 12:46:30

Test Report PLM-7.28.9 Printed: 10/22/2014 12:46:30 PM

THIS IS THE LAST PAGE OF THE REPORT.
APPENDIX C

CHAIN OF CUSTODY DOCUMENTS
**Environmental Solutions, LLC**

16056 - West Yellowstone Airport

11/7/2016 10:00

PLM

---

**EMSL Analytical, Inc.**

500 Gateway Centre Boulevard

Carrboro, NC 27510

PHONE: 919-465-3900
FAX: 919-465-3950

---

**OrderID:** 291608241

**No Samples:** 56  
**DUE:** 11/11 10:00 AM  
**Fax:**

---

**Company Name:** Environmental Solutions, LLC

**City:** Bozeman

**Zip/Postal Code:** 59771

**Country:** US

**Country:**

**Telephone #:** 406-579-1441

**Fax #:**

---

**Report To (Name):** Sonia Rogers

**Purchase Order:**

**Email Address:** srogers@esmontana.com

**EMSL Project ID (Internal Use Only):**

**U.S. State Samples Taken:** MT

**Airport:**

**CT Samples:** □ Commercial/ Taxable □ Residential/ Tax Exempt

---

**Order ID:** 291608241

**Company Name:** Environmental Solutions, LLC

**City:** Bozeman

**Zip/Postal Code:** 59771

**Country:** US

**Telephone #:** 406-579-1441

**Fax #:**

---

**Report To (Name):** Sonia Rogers

**Purchase Order:**

**Email Address:** srogers@esmontana.com

**EMSL Project ID (Internal Use Only):**

**U.S. State Samples Taken:** MT

**Airport:**

**CT Samples:** □ Commercial/ Taxable □ Residential/ Tax Exempt

---

**Turnaround Time (TAT) Options** - Please Check:

- [ ] 3 Hour
- [ ] 6 Hour
- [ ] 24 Hour
- [ ] 48 Hour
- [ ] 72 Hour
- [ ] 1 Week
- [ ] 2 Week

---

**Check if samples are from NY**  
- [ ] NIOSH 7400
- [ ] w/ OSHA 8hr. TWA

---

**PLM - Bulk (reporting limit)**

- [ ] PLM EPA 600/R-93/116 (<1%)
- [ ] PLM EPA NOB (<1%)

---

**Point Count**

- [ ] 400 (<0.25%)  
- [ ] 1000 (<0.1%)

---

**Point Count w/Gravimetric**

- [ ] 400 (<0.25%)  
- [ ] 1000 (<0.1%)

---

**NY5 198.1 (friable in NY)**  
- [ ] NYS NOB 198.4 (non-friable-NY)
- [ ] Chattfield SOP

---

**TEM - Air**

- [ ] AHERA 40 CFR, Part 763
- [ ] NIOSH 7402
- [ ] EPA Level II
- [ ] ISO 10312

---

**TEM - Bulk**

- [ ] TEM EPA NOB
- [ ] NYS NOB 198.4 (non-friable-NY)
- [ ] Chattfield SOP

---

**TEM Mass Analysis - EPA 500 sec. 2.5**

---

**TEM - Water**

- [ ] EPA 100.2

---

**Fibers >10μm**

- [ ] Waste
- [ ] Drinking

---

**All Fiber Sizes**

- [ ] Waste
- [ ] Drinking

---

**Check For Positive Stop - Clearly Identify Homogenous Group**

---

**Filter Pore Size (Air Samples):**

- [ ] 0.8μm
- [ ] 0.45μm

---

**Sample #**

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<tr>
<th>Sample Description</th>
<th>Volume/Area (Air)</th>
<th>Date/Time Sampled</th>
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</thead>
<tbody>
<tr>
<td><em>See Attached</em></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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**Samples Name:**

**Samplers Signature:**

---

**Client Sample # (s):**

**Total # of Samples:** 56

**Reinforced (Client):**

**Date:** 11-4-14  
**Time:** 10:00 AM

**Received (Lab):**

**Date:** 11-7-14  
**Time:** 10:00 AM

---

**Comments/Special Instructions:**

---

**Page 1 of ___ pages**
**Environmental Solutions**

PO Box 7010, Bozeman, MT 59771-7010
P: (406) 579-1441 F: (406) 587-0193 Web: assimilant.com

**Health & Safety - Risk Management Consultants**

**CHAIN OF CUSTODY**

Date Shipped: 11-4-14  
Number of Samples: 56

Project ID: 16055 - West Yellowstone Airport

Shipped Via: ☑ Fed-Ex Standard  ☐ Fed-Ex by 10:00 am  ☐ Fed-Ex Saturday  ☐ US Mail

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<th>Sample Description</th>
<th>Quantity</th>
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<td>01-02-03</td>
<td>12x12 Floor Tile w/Glue</td>
<td>3</td>
</tr>
<tr>
<td>04-05-06</td>
<td>12x12 Floor Tile w/Glue</td>
<td>3</td>
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<tr>
<td>07-08-09</td>
<td>Engineered Floor Tiles</td>
<td>3</td>
</tr>
<tr>
<td>10-11-12</td>
<td>Drywall / Mud / Tape</td>
<td>3</td>
</tr>
<tr>
<td>13-14-15</td>
<td>Rock Wall Mortar</td>
<td>3</td>
</tr>
<tr>
<td>16-17-18</td>
<td>Heavy Ceiling Texture</td>
<td>3</td>
</tr>
<tr>
<td>19-20-21</td>
<td>4x4 Ceramic Tiles &amp; Grout</td>
<td>3</td>
</tr>
<tr>
<td>22-23-24</td>
<td>Insulation</td>
<td>3</td>
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<td>25-26-27</td>
<td>Plaster</td>
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<td>28-29-30</td>
<td>CMU Block</td>
<td>3</td>
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<td>31-32-33</td>
<td>CMU Block Mortar</td>
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<td>34-35-36</td>
<td>Concrete</td>
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</tr>
<tr>
<td>37-38-39</td>
<td>Mortar</td>
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<td>40-41-42</td>
<td>Caulk</td>
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<td>43-44-45</td>
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<td>46-47-48</td>
<td>Window Caulk</td>
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<td>49</td>
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<td>50-51-52</td>
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<td>53-54-55</td>
<td>CMU</td>
<td>3</td>
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<tr>
<td>56</td>
<td>Roofing Materials</td>
<td>1</td>
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</tbody>
</table>
Company: Environmental Solutions LLC
Street: PO Box 7010
City/State/Zip: Bozeman, MT 59717-7010

Report To (Name): Sonya Rogers
Telephone: 406-579-1441
Email Address: srogers@esmontana.com

Project Name/Number: 14071 West Yellowstone Airport

Turnaround Time (TAT) Options* – Please Check

- PCM - Air
  - NIOSH 7400
  - w/ OSHA 8-hr TWA

- PLM - Bulk (reporting limit)
  - PLM EPA 600/R-93/116 (<1%)
  - PLM-EP NOB (<1%)

- Point Count
  - 400 (<0.25%) 1000 (<0.1%)
  - Point Count w/Gravimetric

- TEM - Air
  - 4-4.5hr TAT (AHERA only)
  - AHERA 40 CFR, Part 763
  - NIOSH 7402
  - EPA Level II
  - ISO 10312

- TEM - Bulk
  - TEM EPA NOB
  - NYS NOB 198.4 (non-friable-NY)
  - Charfield SOP
  - TEM Mass Analysis-EPA 600 sec. 2.5

- TEM - Water
  - EPA 100.2
  - Fibers >10 μm
  - Waste
  - Drinking
  - All Fiber Sizes
  - Waste
  - Drinking

Check For Positive Stop – Clearly Identify Homogenous Group

**Sample #** | **Sample Description** | **Volume/Area (Air)** | **Date/Time**
--- | --- | --- | ---
01-02-03 | 9 x 9 Floor Tile w/ Mastic | 3 | 10-21-14 2:00pm
04 | 4" Rubberbase | | 10-22-14 10am
05 | 4" Rubberbase w/ Glue | | 10-22-14 10am

Client Sample # (s): [Signature]

Relinquished (Client): [Signature]
Date: 10-21-14
Time: 2:00pm

Received (Lab): [Signature]
Date: 10-22-14
Time: 10am

Comments/Special Instructions: EFE 79500576 763D
APPENDIX D

FLOOR PLANS
Airport Manager's Office
Office Area #3

Pilot Lounge Area

Office Area #4
Restroom
Shower Area

Office Area #5

Airport Manager's Office
Office Area #3

Office Area #5

NOTE: All Mezzanine Level Flooring is on Wood

12x12 Floor Tile on New Sub-Floor (Assumed over Black Mastic)
Carpet Tiles on Black Mastic
APPENDIX E

ABBREVIATIONS

A/C     asbestos/cement
ACM     asbestos-containing material
AHERA   Asbestos Hazard Emergency Response Act of 1986
ANSI    American National Standards Institute
ASTM    American Society for Testing and Materials
BID     background information document
CAA     Clean Air Act
CPSC    Consumer Products Safety Commission
DOT     Department of Transportation
EPA     Environmental Protection Agency
ID      identification
LEV     local exhaust ventilation
NADC    National Association of Demolition Contractors
NARS    National Asbestos Registry System
NESHAP  National Emission Standards for Hazardous Air Pollutants
NIOSH   National Institute for Occupational Safety and Health
OAQPS   Office of Air Quality Planning and Standards
OSHA    Occupational Safety and Health Administration
OSW     Office of Solid Waste
PEL     permissible exposure limit
PLM     polarized light microscopy
RCRA    Resource Conservation and Recovery Act
SARA    Superfund Amendments and Reauthorization Act of 1986
TEM     transmission electron microscopy
TSCA    Toxic Substances Control Act
LEAD PAINT INSPECTION FOR WEST YELLOWSTONE TERMINAL & GENERATOR BLDG

Report Requested By: MORRISON-MAIERLE, INC.

DATE OF INSPECTION: 11/03/16
Table of Contents

Introduction .................................................................................................................................................. 3
Inspection Procedures .................................................................................................................................. 3
Data Summary ............................................................................................................................................. 3
Disclaimer .................................................................................................................................................. 4
Appendix A – XRF Data Report ..................................................................................................................... 5

Credentials

Authored By: __________________________________________
Sonia Rogers, IH

Reviewed By: __________________________________________
Scott Rogers, CIH, CSP, CHMM

Lead Certifications:

<table>
<thead>
<tr>
<th>Name</th>
<th>EPA Lead Inspector</th>
<th>EPA Risk Assessor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scott Rogers, CIH CSP CHMM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sonia Rogers, IH</td>
<td></td>
<td>EPA Region VIII,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>#MT-R-15691-1</td>
</tr>
</tbody>
</table>
INTRODUCTION

Environmental Solutions LLC performed a cursory visual and XRF evaluation of painted and glazed surfaces for lead content on November 3rd, 2016, of the West Yellowstone Airport terminal and generator building located in West Yellowstone, Montana. This evaluation was performed at the request of Morrison-Maierle Incorporated of Bozeman MT.

The intent of this report is to provide a cursory guide and general determination of the presence of lead containing surfaces identified above at the facility. Not all components, surfaces or materials were tested. This report and its recommendations are based upon the evaluation of surfaces of similar type and color with an X-ray fluorescence analyzer (XRF).

INSPECTION PROCEDURES

The lead inspection was performed by Environmental Solutions EPA Region VIII, Certified Lead Risk Assessor and reviewed by the Certified Industrial Hygienist (CIH). The inspection consisted of a detailed visual survey of the structures and evaluation of painted and glazed surfaces by using an X-Ray Fluorescence (XRF) spectrum analyzer for surface evaluation of lead paint concentrations. The XRF was standardized prior to evaluations and as manufacture’s recommendation and confirmed using a standardized paint sample at 1.04 mg/cm² during the sampling process.

The Spectrum analyzer was used on painted and glazed surfaces throughout the areas. Samples or surfaces where analytical results by XRF are reproducible and above the 1.0 mg/cm² for lead are identified as positive for lead concentrations per industry standards. OSHA requirements, EPA, and HUD requirements for lead safe work practices are triggered at this level.

Data Summary

NO lead based paint was identified inside or on the exterior of the Terminal building or the Generator building.

Sample analysis results are included in Appendix A.
DISCLAIMERS

This document and its contents incorporated herein, are proprietary information and as an instrument of professional services, is the property of Environmental Solutions LLC, and are not to be used, in part or in whole for any other project without the written authorization of Environmental Solutions LLC.

This lead assessment report was prepared based on information obtained during the survey and interpretation of the XRF results of samples. The conclusions of this report are professional opinions based solely upon visual site observations and interpretations of XRF analysis and field data as described in our report.

This report has been prepared to provide information concerning the various types of lead-containing materials that may be present at this site. Our opinions are intended exclusively for use by Morrison-Maierle, Inc. The scope of services performed by Environmental Solutions LLC may not be appropriate to satisfy the needs of other users, and any use or re-use of this document, or the findings presented herein, is at the sole risk of the user. Use of this report for the determination of lead containing materials for worker protection is at the sole risk of the user.
APPENDIX A

XRF DATA REPORT
<table>
<thead>
<tr>
<th>Index</th>
<th>Time</th>
<th>Site</th>
<th>Location</th>
<th>Room Type</th>
<th>Side</th>
<th>Color</th>
<th>Component</th>
<th>Substrate</th>
<th>Results</th>
<th>PbC</th>
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<td>Ceiling</td>
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<tr>
<td>15</td>
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<td>Brown</td>
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MOA AND PA FOR SECTION 106 PROCESS
MEMORANDUM OF AGREEMENT

BETWEEN THE FEDERAL AVIATION ADMINISTRATION

AND

THE MONTANA STATE HISTORIC PRESERVATION OFFICE

REGARDING THE PROPOSED CONSTRUCTION OF NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

WHEREAS the Federal Aviation Administration (FAA) is considering funding for the construction of a new terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana, pursuant to 49 USC § 47107(a)(16), FAA Order 5100.38D, Airport Improvement Program Handbook, and Coronavirus Aid, Relief, and Economic Security (CARES) Act Airport Grant Program; and

WHEREAS the undertaking consists of the construction of a new terminal building and parking lot infrastructure; demolition of the existing terminal and generator building; expansion of a concrete commercial aircraft parking pad; reconstruction and extension of the airport access road; new water, sewer, and fiber optic infrastructure improvements; timber clearing to facilitate subsurface utilities; and replacement of the existing airport beacon with a new beacon and tower (layouts included in Appendix A); and

WHEREAS, the FAA has determined that this undertaking is subject to the National Environmental Policy Act (NEPA) as well as the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended); and

WHEREAS, the FAA is the lead agency for complying with NEPA; Section 106 of the NHPA as amended (16 USC 470f), and the regulations implementing Section 106 of the NHPA (36 CFR Part 800); and Government to Government consultation under Executive Order 13175; and

WHEREAS, the State of Montana - Department of Transportation Aeronautics Division (MDT), Airport Sponsor for the Yellowstone Airport (WYS), is the entity proposing the construction of a new terminal and associated improvements at WYS near West Yellowstone, Montana; and

WHEREAS, the FAA has defined the undertaking’s area of potential effect (APE), as defined at 36 CFR part 800.16(d), to correspond to the terminal area and areas of disturbance for utility improvements as shown in Appendix A; and

WHEREAS the FAA has determined that the undertaking may have an adverse effect on the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), which are eligible to the National Register of Historic Places (NRHP) under Criteria A and C and are proposed for removal under the proposed undertaking. The FAA has consulted with the Montana State Historic Preservation Office (SHPO) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the NHPA (54 USC § 306108); and
WHEREAS, the FAA contacted the Blackfeet Nation, the Coeur d’Alene Tribe, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Kootenai Tribe of Idaho, the Nez Perce Tribe, and the Shoshone Bannock Tribes in accordance with Section 106 of the NHPA and implementing regulations 36 CFR Part 800 regarding the effects of the undertaking on historic properties and Executive Order 13175 to initiate government to government consultation; and

WHEREAS, the FAA received responses from the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Shoshone Bannock Tribes, and the Nez Perce Tribe; and

WHEREAS the Confederated Salish and Kootenai Tribes of the Flathead Reservation posed no objections to the proposed undertaking; and

WHEREAS the FAA has consulted with the Shoshone Bannock Tribes regarding the effects of the undertaking on historic properties, to include the Great Bannock Trail, and the Shoshone Bannock Tribes posed no objections to the proposed undertaking; and

WHEREAS, the FAA has consulted with the Nez Perce Tribe regarding the effects of the undertaking on historic properties and the Nez Perce Tribal Historic Preservation Officer (NP THPO) raised concerns that any potential effect to the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) or to the Nez Perce Tribe could not be adequately evaluated without ethnographic studies on the NPNHT to gather oral history regarding the Nez Perce experience during the Nez Perce War of 1877 while pursued by the United States Army (US Army); and

WHEREAS the FAA has agreed to pursue a Programmatic Agreement (PA) to conduct ethnographic studies with the Nez Perce Tribe regarding the NPNHT in the Hebgen Basin of Montana pursuant to 36 CFR § 800.14(b)(ii) and 36 CFR § 800.14(b)(v) when effects on historic properties cannot be fully determined prior to approval of an undertaking and other circumstances warrant a departure from the normal Section 106 process; and the terms of the PA will be carried out prior to any construction, disturbance, or timber removal related to utility improvements that will cross National Forest system lands between the town of West Yellowstone and WYS; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FAA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation regarding the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) as well as the potential adverse effect determination as a result of the evaluation of the ethnographic studies conducted under a PA and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, the FAA and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The FAA shall ensure that the following measures are carried out:

I. MITIGATION PLAN
A. Conduct a Historic American Engineering Record (HAER) level II documentation of Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower at the Yellowstone Airport.

B. During construction of the improvements:
   1. Preserve the upper portion of the beacon tower to include the top platform and beacon apparatus and enough of the tower to convey the design and function of the beacon in order to display at WYS. The display will be located either within the new airport terminal or outside the new terminal building and within the terminal area.
      a) Design, manufacture, and install an interpretive sign for the beacon tower display to explain the importance of Montana’s Historic Airway Beacon System.
      b) SHPO will provided the opportunity to review and comment upon the design and location of the beacon tower display and the text and design of the interpretive sign. SHPO will be provided a copy of the final designs.
   2. Preserve rock materials from the façade of the original terminal to be repurposed into the new terminal, outside landscaping, and/or platform for the beacon tower display described in (1) above.
      a) Design, manufacture, and install an interpretive display in the new terminal to provide pictures of the original terminal building and explain efforts to repurpose materials or features of the original terminal into terminal area improvements.
      b) SHPO will be provided the opportunity to review and provide comment on the details of repurposing the rock materials before plans are finalized, and review and comment on the interpretive sign. While no minimum amount of rock materials to be repurposed is specified in this MOA, SHPO will provide review and comment to ensure that the intent of this stipulation is met.

II. PROFESSIONAL QUALIFICATIONS

A. Professional Qualifications and Cultural Resources Permitting
   1. All actions prescribed by this MOA that involve the identification, evaluation, analysis, recording, treatment, monitoring, and disposition of historic properties, and involve the reporting and documentation of such actions in the form of reports, forms, or other records, shall be carried out by or under the direct supervision of a person or persons meeting at a minimum, the Secretary of the Interior’s Professional Qualifications Standards (PQS) for archaeology, history, or architectural history, as appropriate (48 FR 44739).

B. Documentation Standards
   1. The report and documentation of the actions cited in Stipulation I shall conform with the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation (48 FR. 44716-44740), as well as with all applicable standards, guidelines, and forms for historic preservation established by the SHPO.

III. MONITORING AND REPORTING

Each quarter following the execution of this MOA until it expires or is terminated, MDT shall provide the FAA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in
MDT’s efforts to carry out the terms of this MOA. This report can be included with the Quarterly Performance Report that is required in accordance with 49 CFR 18.40 for projects funded under the Airport Improvement Program (AIP), which is due within 30 days after the end of each quarter (due by January 30, April 30, July 30, October 30). Any Final Reports required for FAA grants accepted by the Airport Sponsor (AIP or CARES Act) for design or construction of the undertaking shall include a description of the steps taken and progress of meeting the terms of this MOA, and/or how the terms of this MOA have been met. Upon receipt, the FAA will distribute the summary to the SHPO.

IV. POST-REVIEW DISCOVERIES

If the proposed project activities encounter a previously unknown cultural resource, or if project activities directly or indirectly affect a known resource in an unanticipated manner, the FAA shall implement the Plan for Discovery of Unanticipated Cultural Resources included in Appendix B of this MOA.

V. DISCOVERY OF HUMAN REMAINS

If construction or other project personnel identify what they believe to be human remains, they will immediately halt construction at that location and notify the county coroner per the provisions of Montana’s Human Skeletal Remains and Burial Site Protection Act (22-3-801 et seq. MCA) and the Native American Graves Protection and Repatriation Act (NAGPRA) (if the discovery is on Federal land). The coroner has two (2) working days to determine if the remains represent a crime scene or if the remains must be removed in order to determine if they are a crime scene. No one else has the authority to make this determination or remove any evidence or remains. The coroner should make every reasonable effort to accomplish the determination without disturbing the remains. If the coroner determines that the remains are not a crime scene:

A. If the human remains are found on private or state property, then the coroner must then notify the MT SHPO of the findings within 24 hours. The MT SHPO will notify the State Burial Board, the landowner (if this has not already occurred), and Tribes (as appropriate). The Board or its duly appointed representative will determine, in concert with the landowner, an appropriate disposition of the remains. Once the Board has made that determination, the Board will authorize commencement of work or outline other arrangements.

B. If the human remains are found on federal property, the federal agency will follow NAGPRA guidelines and notify the appropriate Tribes.

VI. DURATION

This MOA will expire if its terms are not carried out within (5) years from the date of its execution or at the completion of all associated construction required to construct a new terminal and replace the Airport beacon and tower and submission of the associated Final Reports under AIP and the CARES Act; whichever comes later. Prior to such time, the FAA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VIII below.
VII. DISPUTE RESOLUTION

Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the FAA shall consult with such party to resolve the objection. If the FAA determines that such objection cannot be resolved, the FAA will:

A. Forward all documentation relevant to the dispute, including the FAA’s proposed resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. The FAA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FAA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA, and provide them and the ACHP with a copy of such written response.

C. The FAA’s responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VIII. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

IX. TERMINATION

A. If any signatory to this PA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation XII, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the PA upon written notification to the other signatories.

B. Once the PA is terminated, and prior to work continuing on the undertaking, the FAA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) execute a PA pursuant to 36 CFR § 800.14 or (c) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. The FAA shall notify the signatories as to the course of action it will pursue.

C. Execution of this PA and implementation of its terms evidence that the FAA and USFS have taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.
SIGNATORIES:

UNITED STATES OF AMERICA
FEDERAL AVIATION ADMINISTRATION

_____________________________ Date:_______________________
William Garrison, Manager
Helena Airports District Office

MONTANA STATE HISTORIC PERSERVATION OFFICE

_____________________________ Date:_______________________
Pete Brown
State Historic Preservation Officer

STATE OF MONTANA – DEPARTMENT OF TRANSPORTATION

_____________________________ Date:_______________________
Tim Conway
Administrator, Aeronautics Division
APPENDIX A

TO THE MEMORANDUM OF AGREEMENT REGARDING THE PROPOSED CONSTRUCTION OF A NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

Project Layouts and Area of Potential Effect (APE)
ALTERNATE TYPE 2 SEPTIC SYSTEM OR HIGHER LEVEL TREATMENT LOCATION SHOULD CONNECTION TO TOWN SEWER TREATMENT FACILITIES NOT BE AVAILABLE

ALTERNATE WELLWATER TANK/FIRE PUMP LOCATION SHOULD CONNECTION TO TOWN WATER FACILITIES NOT BE AVAILABLE

LEGEND

- SEWER MAIN / FORCE MAIN ~ 12, 100 LF
- WATER MAIN ~ 27,815 LF
- FIBER OPTIC ~ 12,360 LF

USFS FIRE CENTER

AREA ~ 50.41 ACRES

Morrison Maierle

1-5
Area of Potential Effect (APE) shown by Orange line

Covers areas of terminal area and areas of disturbance for utility improvements
Area of Potential Effect (APE) shown by Orange line

Covers areas of terminal area and areas of disturbance for utility improvements

The area surrounded by the purple line outlines the area associated with water and fiber optic improvements on National Forest land.
APPENDIX B

TO THE MEMORANDUM OF AGREEMENT REGARDING THE PROPOSED CONSTRUCTION OF A NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

Plan for Discovery of Unanticipated Cultural Resources

Cultural resources can be found during any ground-disturbing activity. If a monitor is onsite per Stipulation VII, he/she may determine if the discovery should trigger the procedures described in this document. If no monitor is onsite, all excavation and work in the area must stop, and the procedures as described below must be followed. If in doubt, follow the procedures outlined in this document. Unanticipated discoveries can vary and include evidence or remnants of historic-era and precontact activities by humans. Cultural resources can include, but are not limited to:

- Stone flakes, arrowheads, stone tools, bone or wooden tools, baskets, beads.
- Historic building materials such as nails, glass, metal such as cans, barrel rings, farm implements, ceramics, bottles, marbles, beads.
- Layers of discolored earth resulting from hearth fire.
- Structural remains such as foundations.
- Shell Middens.
- Human skeletal remains and/or bone fragments which may be whole or fragmented.

In the event that previously unknown cultural resources are discovered within the Area of Potential Effects from construction activities of the undertaking, or should those activities directly or indirectly impact known historic properties in an unanticipated manner, the following actions, at a minimum, will be initiated by the FAA, or a representative duly authorized to perform these tasks:

1. All activities will halt in the immediate vicinity of the discovery and all actions that might adversely affect the property will be redirected to an area at least 200 feet from the point of discovery.

2. The FAA and Montana Department of Transportation – Aeronautics Division (MDT) will be notified immediately (within 24 hours), and the FAA will notify MT SHPO and any Indian tribe that might attach religious and cultural significance to the affected property.
   a. If not already onsite, a professional archaeologist who meets the Secretary of the Interior’s qualifications (36 CFR Part 61) will be called in within 48 hours to assess the discovery.

3. Upon arriving at the site of the discovery, the professional archaeologist shall assess the resource. The assessment shall include:
a. The nature of the resource (e.g., number and kinds of artifacts, presence/absence of features). This may require screening of already disturbed deposits, photographs of the discovery, Global Positioning System (GPS) data, and other necessary documentation. The archeologist will have basic archaeological excavation tools on hand.

b. The spatial extent of the resource. This may require additional subsurface examination, mapping or inspection, as is appropriate to the resource

c. The nature of deposition/exposure. This may require interviews with construction personnel and with other persons having knowledge about the resource or the expansion of existing disturbance to establish the characteristics of the deposits.

4. The professional archeologist will complete a brief summary of the assessment and submit the report to the FAA, USFS, MDT, the Nez Perce Tribe (due to the proximity of the NPNHT), and the MT SHPO within 10 days of fieldwork for further instruction. The FAA will also notify any Indian Tribe that might attach religious and cultural significance to the affected property.

5. The FAA will consult with the USFS, MT SHPO, MDT, and any Indian tribe that might attach religious and cultural significance to the affected property to determine if and when construction activities in the location of the discovery may resume.

6. After consultation, the FAA will issue appropriate determinations of eligibility of any resources discovered and a determination of effect before construction in the location of the discovery may resume. Consistent with 36 CFR § 800.13(b)(3) (Post-review discoveries) Tribes and MT SHPO will have 72 hours to respond to the determinations.

7. If unanticipated discoveries are made on the undertaking, a technical report will be written at the end of the project by the on-site professional archaeologist and will be submitted within four months to the MT SHPO by the FAA. Reports dealing with sensitive information regarding sacred areas or other similar resources of historical or cultural importance to Native Americans will be reviewed only by those who have responsibility for National Register eligibility determinations or management concerns of such properties.

8. Report and documentation efforts shall conform with the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation (48 FR. 44716-44740), as well as with all applicable standards, guidelines, and forms for historic preservation, including Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey (HABS/HAER/HALS) guidance, and guidance established by the MT SHPO.

9. If the unanticipated discoveries may be related to the Nez Perce (Nee-Me-Poo) National Historic Trail, the Nez Perce Tribal Historic Preservation Officer will be notified and the Programmatic Agreement relating to ethnographic study will be reviewed for applicability. The FAA will also notify any other Indian Tribe that might attach religious and cultural significance to the affected property.

10. Points of Contact:
FAA: Diane Stilson, HLN ADO - (406) 441-5411
MDT: Jeff Kadlec, Yellowstone Airport Manager - (406) 459-9825
MT SHPO: Jessica Bush, State Archaeologist – (406) 444-0388
Nez Perce Tribe: Patrick Baird, Tribal Historic Preservation Officer - (208) 791-8610
PROGRAMMATIC AGREEMENT

AMONG THE
FEDERAL AVIATION ADMINISTRATION,
THE UNITED STATES FOREST SERVICE,
THE MONTANA DEPARTMENT OF TRANSPORTATION – AERONAUTICS DIVISION,
THE MONTANA STATE HISTORIC PRESERVATION OFFICE,
AND THE NEZ PERCE TRIBE
REGARDING

THE PROPOSED CONSTRUCTION OF NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

WHEREAS the Federal Aviation Administration (FAA) is considering funding for the construction of a new terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana, pursuant to 49 USC § 47107(a)(16), FAA Order 5100.38D, Airport Improvement Program Handbook, and Coronavirus Aid, Relief, and Economic Security (CARES) Act Airport Grant Program; and

WHEREAS the undertaking consists of the construction of a new terminal building and parking lot infrastructure; demolition of the existing terminal and generator building; expansion of a concrete commercial aircraft parking pad; reconstruction and extension of the airport access road; new water, sewer, and fiber optic infrastructure improvements; timber clearing to facilitate subsurface utilities; and replacement of the existing airport beacon with a new beacon and tower (layouts included in Appendix A); and

WHEREAS, the FAA has determined that this undertaking is subject to the National Environmental Policy Act (NEPA) as well as the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended); and

WHEREAS, the FAA is the lead agency for complying with NEPA; Section 106 of the NHPA as amended (16 USC 470f), and the regulations implementing Section 106 of the NHPA (36 CFR Part 800); and Government to Government consultation under Executive Order 13175; and

WHEREAS, the United States Forest Service (USFS) is considering issuance of a special use authorization for the installation of water and fiber optic infrastructure on National Forest system lands and financial contribution to infrastructure improvements to facilitate potential connection for the USFS West Yellowstone Interagency Fire Center adjacent to WYS and is a cooperating agency for NEPA compliance; and

WHEREAS, the State of Montana - Department of Transportation Aeronautics Division (MDT), Airport Sponsor for the Yellowstone Airport (WYS), is the entity proposing the construction of a new terminal and associated improvements at WYS near West Yellowstone, Montana; and

WHEREAS, the FAA has defined the undertaking’s area of potential effect (APE), as defined at 36 CFR § 800.16(d), to correspond to the terminal area and areas of disturbance for utility improvements as shown in Appendix A; and
WHEREAS, the FAA has undertaken efforts to identify historic properties eligible for listing on the National Register of Historic Places (NRHP) and has consulted with the Montana State Historic Preservation Office (MT SHPO) to prepare a Memorandum of Agreement (MOA) regarding adverse effects on the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), which are eligible to the NRHP under Criteria A and C and are proposed for removal under the proposed undertaking; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FAA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation regarding the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the FAA contacted the Blackfeet Nation, the Coeur d’Alene Tribe, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Kootenai Tribe of Idaho, the Nez Perce Tribe, and the Shoshone Bannock Tribes in accordance with Section 106 of the NHPA and implementing regulations 36 CFR Part 800 regarding the effects of the undertaking on historic properties and Executive Order 13175 to initiate government to government consultation; and

WHEREAS, the FAA received responses from the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Shoshone Bannock Tribes, and the Nez Perce Tribe; and

WHEREAS, the Confederated Salish and Kootenai Tribes of the Flathead Reservation posed no objections to the undertaking; and

WHEREAS, the FAA has consulted with the Shoshone Bannock Tribes regarding the effects of the undertaking on historic properties, to include the Great Bannock Trail, and the Shoshone Bannock Tribes posed no objections to the undertaking; and

WHEREAS, the FAA has consulted with the Nez Perce Tribe regarding the effects of the undertaking on historic properties and the Nez Perce Tribal Historic Preservation Office (NP THPO) raised concerns that any potential effect to the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) or to the Nez Perce Tribe could not be adequately evaluated without an ethnographic study on the NPNHT to gather oral history regarding the Nez Perce experience during the Nez Perce War of 1877 while pursued by the United States Army (US Army); and

WHEREAS, investigation into the location of the NPNHT placed the official designated route of the NPNHT to the north of the APE and uncovered no physical remnants of the NPNHT in the APE; and

WHEREAS the undertaking will largely be constructed on airport property in areas of developed or heavily disturbed land, except for the utility corridor for water and fiber optic improvements which will be extended from the town of West Yellowstone to WYS and cross National Forest system lands; however, the FAA, MDT, and USFS have agreed that approximately 800 members of the Nez Perce Tribe passed through the general area of the designated route of the NPNHT, and likely did not stay within the boundaries of the NPNHT as it is delineated today; and have further agreed that the events surrounding the Nez Perce War of 1877 on the NPNHT were a traumatic and significant event upon the Nez Perce of the time, and potentially has lasting impacts upon current members of the Nez Perce Tribe; and
WHEREAS, the FAA, MDT, and USFS have agreed with the NP THPO that due to the gravity and significance of the Nez Perce War of 1877 upon the Nez Perce Tribe, the ambiguous nature of the true path they followed, and the proximity of the utility corridor crossing National Forest system lands for water and fiber optic improvements to the designated location for the NPNHT; that an ethnographic study is the appropriate means to examine potential effects on the NPNHT and current Nez Perce Tribe due to the utility corridor crossing National Forest system lands; and

WHEREAS, it will take significant time for the Nez Perce Tribe to conduct an ethnographic study to assess the oral history of the Nez Perce experience in the Hebgen Basin during the Nez Perce War of 1877, which is complicated by the COVID 19 pandemic; and the likelihood of encountering significant physical remnants of the passage of the Nez Perce in 1877 that will be adversely affected by the undertaking is remote and likely to be lesser value than assessment of the oral histories; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FAA has notified the ACHP of the potential adverse effect determination as a result of the evaluation of the ethnographic study conducted under a PA and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, the FAA, MDT, USFS, MT SHPO, and the Nez Perce Tribe agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking, specifically the utility corridor for water and fiber optic improvements, on the NPNHT and Nez Perce Tribe:

**STIPULATIONS**

The FAA and USFS, in coordination with the MT SHPO, MDT, and NP THPO shall ensure that the following measures are carried out:

I. INTENT
   A. This Programmatic Agreement (PA) has been developed in order for the Nez Perce Tribe to conduct an ethnographic study regarding the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) in the Hebgen Basin of Montana pursuant to 36 CFR § 800.14(b)(ii) and 36 CFR § 800.14(b)(v) when effects on historic properties cannot be fully determined prior to approval of an undertaking and other circumstances warrant a departure from the normal Section 106 process.
   B. Provisions of this PA will be incorporated in the Environmental Assessment (EA) being prepared for the undertaking for compliance with the National Environmental Protection Act (NEPA) and any resulting decision documents to ensure that effects due to the undertaking are assessed through the ethnographic study and that any adverse effects of the undertaking, specifically due to installation of a utility corridor for water and fiber optic improvements crossing National Forest system lands, upon the NPNHT and Nez Perce Tribe are adequately mitigated if adverse effects are identified in accordance with 36 CFR § 800.5.
   C. Tiered Agreements: If adverse effects are identified, the signatories of this PA will execute a Memorandum of Agreement (MOA) to document the mitigation requirements
for the adverse effects consistent with 36 CFR § 800.5-6, will notify the Advisory Council of Historic Preservation of the adverse effect finding, and invite them to participate in consultation consistent with 36 CFR § 800.6(a)(1).

D. The terms of this PA will be carried out prior to any ground disturbing activities, construction, or timber removal related to utility improvements that will cross National Forest system lands between the town of West Yellowstone and WYS.

E. The EA includes an alternative for onsite improvements for water infrastructure at WYS. This alternative would be utilized in the case that extending water infrastructure from West Yellowstone is found to be impractical, which could include the failure to meet the terms of this PA.

1. If improvements for water infrastructure are not extended from West Yellowstone, the fiber optic line will not be constructed, as the utility corridor for a fiber optic line will be co-located with the new water line extending services from West Yellowstone.

2. If extending water services from West Yellowstone is found to be impractical and the utility corridor from West Yellowstone to WYS is not needed, then there will be no adverse effects to the NPNHT and Nez Perce Tribe from the Proposed Action as identified in the EA. In the event of this situation, the Signatories of this PA will resume consultation to determine if termination of the ethnographic study is practical, or if completing the ethnographic study per Stipulation III is the best course of action.

II. ROLES AND RESPONSIBILITIES

A. The FAA and the USFS shall incorporate the terms of this PA into any environmental determination resulting from the EA being prepared for the undertaking for NEPA compliance. Stipulations contained within this PA will be adhered to in order for the undertaking to comply with NEPA, Section 106 of the NHPA, and Government to Government consultation with the Nez Perce Tribe in accordance with Executive Order 13175.

B. The FAA, USFS, and MDT will complete a reasonable and good faith effort to pursue completion of the ethnographic study and assess effects due to the undertaking in accordance with 36 CFR § 800.5. If adverse effects are identified, they will be resolved in consultation with Signatories to this PA consistent with Stipulation I(C).

C. The Nez Perce Tribe will conduct the ethnographic study with Tribal elders, archive searches, and other sources to gather oral histories and information regarding the Nez Perce experience during the Nez Perce War of 1877 in the Hebgen Basin while being pursued by the US Army. The ethnographic study will be conducted to gather information on these important histories in the Hebgen Basin, and in a timely manner; taking into consideration adequate precautions due to COVID 19 and to assess any effects that need to be considered prior to physical construction of the utility corridor as described in Stipulation I(D).
D. The FAA, USFS, and MDT shall ensure that no ground disturbing activities, construction, or timber removal outside of the terminal area and airport property for the utility corridor for water and fiber optic on National Forest system lands as identified in Stipulation I(D) will take place until the evaluation of the ethnographic study has occurred, effects due to the undertaking have been assessed, and mitigation of any potential adverse effects have been documented in an MOA consistent with Stipulation I(C).

E. Funding for the ethnographic study will be provided through applicable sources from the FAA, USFS, and MDT as part of project development or design costs, pending successful completion of the NEPA process and issuance of a decision document for the undertaking under NEPA. While the USFS also has an undertaking requiring Section 106 compliance and thus potential obligations for funding mitigation costs, the USFS policy is to require payment of those fees by its permit applicants. Thus, any fees attributable to the USFS will be accomplished via agreement with MDT in consideration of design and construction costs for utility improvements to facilitate potential connection for the USFS West Yellowstone Interagency Fire Center.

F. The ethnographic study will be performed by the Nez Perce Tribe in accordance with 2 CFR § 200.320(f), *Procurement by Noncompetitive Proposals*, when an item is available only from a single source. The Nez Perce Tribe will prepare a cost analysis for noncompetitive procurement proposals in accordance with 2 CFR § 200.323, *Contract cost and price*.

G. The Nez Perce Tribe will retain the results of the ethnographic study along with all research notes and interview transcripts. Any specific findings from the ethnographic research will not be shared outside of the Nez Perce Tribe without a need to access the information and only with the express permission of the Nez Perce Tribe.

H. An executive report containing information from the ethnographic study will be prepared for the FAA, USFS, MDT, and MT SHPO that will be used by the FAA in consultation with the other Signatories to assess effects of the undertaking on the NPNHT and Nez Perce Tribe. The executive report will omit any sensitive cultural information that is not appropriate for public release, as agreed by the FAA, USFS, MT SHPO, and the Nez Perce. The executive report may also be used to develop interpretive displays and educational material. Any educational, interpretive, or other materials developed from the ethnographic study will be accomplished in collaboration with, and approval of, the Nez Perce Tribe. The development of such materials is outside the scope of this PA unless stipulated as mitigation in accordance with Stipulation I(C).

I. If the Nez Perce Tribe recommends a finding of adverse effect due to the undertaking upon the NPNHT and/or the Nez Perce Tribe based on the ethnographic study, adequate information must be released to the FAA as determined by the FAA and MT SHPO to evaluate the recommendation and make a finding if the executive report is not adequate to support an adverse effect finding.

J. Unless otherwise agreed to by the Signatories (FAA, USFS, MDT, MT SHPO, or Nez Perce Tribe) or stated in this PA, Signatories shall have 30 calendar days to respond to a
request to review any activities associated with the accomplishment of this PA (such as the review of documents), from receipt of a formal request for review. The FAA shall make reasonable attempts to contact the Signatories to confirm that the party has elected not to comment or agrees with the course of action proposed by the FAA. “Reasonable attempts” include contacting office staff, management, or the Tribal Chairperson by email with a follow-up phone call. Where the time period for review or comment (30 days) has passed that included such reasonable attempts, the FAA may assume that the Consulting Party has elected not to comment and may proceed with the course of action proposed.

K. As lead agency for NEPA, Section 106 compliance, and Government to Government consultation, the FAA will make the final determination of effects after the ethnographic study is completed and after consultation with the Nez Perce, USFS, MDT, and MT SHPO in accordance with 36 CFR § 800.5-7.

III. ETHNOGRAPHIC STUDY
A. Scope: an ethnographic study will be conducted with the elders of the Nez Perce Tribe, archive searches, and other sources in order to gather oral history and information regarding the Nez Perce War of 1877 on what is now known as the NPNHT in the Hebgen Basin as the Tribe entered the area of what is now known as Yellowstone National Park as they were pursued by the US Army.
1. Consideration will be given to any aspect of the study which may have bearing on physical remains that could be encountered in or near the APE for the utility improvements that will cross National Forest system lands between the town of West Yellowstone and WYS – i.e: camp sites, prayer sites, sites of conflicts or skirmishes with the US Army, etc.
2. Consideration will also be given to any impact that the utility improvements on National Forest system lands may have that would be unique to the NPNHT or the Nez Perce Tribe—i.e: visual impact, cultural impact, etc.
3. The ethnographic study is expected to be completed within one year after a contract for completion of the study has been signed.
B. An executive report in accordance with Stipulation II(H) will be produced from the ethnographic study, which will include a summary of techniques employed for the ethnographic study, summary of the study itself (omitting any sensitive cultural information that is not appropriate for public release), and recommendation of effect due to the undertaking’s actions on the NPNHT and Nez Perce Tribe.
C. The individual, or individuals overseeing information gathered from the ethnographic study will meet the Secretary of the Interior’s Professional Qualification Standards (36 CFR Part 61 Appendix A).

IV. ASSESSMENT OF EFFECTS
A. Once the ethnographic study has been completed, the individual, or individuals responsible for overseeing the ethnographic study, will submit an executive report in accordance with Stipulation II(H) to the FAA, USFS, MDT, and MT SHPO. These Signatories will be allowed a thirty (30) day review period in which the FAA will lead consultation in accordance with 36 CFR § 800.5-7 prior to making a final determination of effects. The assessment of effects will be based upon:
1. Compliance with Section 106 of the NHPA in accordance with 36 CFR § 800.5, which state that an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling or association. Impacts to the NPNHT could include, but are not limited to:
   a) Physical destruction or damage, alteration, change of character, or change of the use or physical features of the NPNHT; or
   b) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the significant historic features of the NPNHT; or
   c) Introduction of physical, visual, atmospheric, or audible elements that impact the qualities of the NPNHT that are significant to the Nez Perce Tribe, which recognizes the NPNHT as a memorial to Nez Perce Tribal members lost during the Nez Perce War of 1877.
2. Compliance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, which directs Federal agencies to consult with tribal governments regarding issues which significantly or uniquely affect their communities.
   a) The undertaking will be assessed to determine any effects upon the Nez Perce Tribe or individual members of the Nez Perce due to the traumatic and significant events of 1877 that may have lasting effects upon Tribal members.
   b) Impacts from such effects will be limited to the scope intended to be addressed within this PA as explained in Stipulation III(A).

B. If, after consultation, the FAA determines that there will be no effect to the NPNHT or the Nez Perce Tribe (i.e. no historic properties affected), the FAA will document this finding, proceed with construction of the utility installation for water and fiber optic from the town of West Yellowstone as proposed, and provide documentation to the MT SHPO according to 36 CFR §800.4.

V. MITIGATION OF ADVERSE EFFECTS

A. If the NPNHT, Nez Perce Tribe, or Tribal members will be adversely affected per the evaluation described in Stipulation IV, the FAA and USFS shall consult with the Nez Perce Tribe in accordance with 36 CFR § 800.6(a) to identify appropriate measures to avoid, minimize or mitigate adverse effects following notification of an “adverse effect” determination.
1. If an adverse effect is identified according to the criteria under 36 CFR § 800.5(a), a finding of no adverse effect may still be determined if the undertaking can be modified or conditions imposed in accordance with 36 CFR § 800.5(b) to avoid adverse effects.

B. As stated in Stipulation I(C), if adverse effects are identified that cannot be mitigated, minimized, or avoided for a finding of no adverse effect, the Signatories of this PA will execute an MOA to document the exact requirements of any mitigation of adverse effects.
VI. MONITORING AND REPORTING

Each quarter following the execution of this PA until it expires or is terminated, the Nez Perce Tribe shall provide the FAA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in the Nez Perce Tribe’s efforts to carry out the terms of this PA. This report will be due within 30 days after the end of each quarter (due by January 30, April 30, July 30, October 30). Upon receipt, the FAA will distribute the summary to the USFS, MDT, and MT SHPO.

VII. MONITORING DURING CONSTRUCTION

A cultural resource monitor meeting professional qualification standards for Archaeology defined in the Secretary of the Interior’s Professional Qualification Standards (PQS) for archaeology (48 FR 44739) will be provided the opportunity to be onsite during ground disturbing activities for utility installation and timber removal for the water and fiber optic lines from West Yellowstone to WYS. This monitor will be funded through the undertaking.

A. The Nez Perce Tribe will be provided an opportunity to fill this position. If accepted, the Nez Perce Tribe will be notified at least two months before construction is scheduled to commence and provided a construction schedule of ground disturbing activities at least one week in advance of such activities.

VIII. POST-REVIEW DISCOVERIES

If the proposed project activities encounter a previously unknown cultural resource, or if project activities directly or indirectly affect a known resource in an unanticipated manner, the FAA shall implement the Plan for Discovery of Unanticipated Cultural Resources included in Appendix B of this PA.

IX. DISCOVERY OF HUMAN REMAINS

If construction or other project personnel identify what they believe to be human remains, they will immediately halt construction at that location and notify the county coroner per the provisions of Montana’s Human Skeletal Remains and Burial Site Protection Act (22-3-801 et seq. MCA) and the Native American Graves Protection and Repatriation Act (NAGPRA) (if the discovery is on Federal land). The coroner has two (2) working days to determine if the remains represent a crime scene or if the remains must be removed in order to determine if they are a crime scene. No one else has the authority to make this determination or remove any evidence or remains. The coroner should make every reasonable effort to accomplish the determination without disturbing the remains. If the coroner determines that the remains are not a crime scene:

A. If the human remains are found on private or state property, then the coroner must then notify the MT SHPO of the findings within 24 hours. The MT SHPO will notify the State Burial Board, the landowner (if this has not already occurred), and Tribes (as appropriate). The Board or its duly appointed representative will determine, in concert with the landowner, an appropriate disposition of the remains. Once the Board has made that determination, the Board will authorize commencement of work or outline other arrangements.
B. If the human remains are found on federal property, the federal agency will follow NAGPRA guidelines and notify the appropriate Tribes.

X. DURATION

This PA will expire if its terms are not carried out within (5) years from the date of its execution. Prior to such time, the FAA may consult with the other signatories to reconsider the terms of the PA and amend it in accordance with Stipulation XII below.

XI. DISPUTE RESOLUTION

Should any signatory to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented, the FAA shall consult with such party to resolve the objection. If the FAA determines that such objection cannot be resolved, the FAA will:

A. Forward all documentation relevant to the dispute, including the FAA’s proposed resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. The FAA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FAA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the PA, and provide them and the ACHP with a copy of such written response.

C. The FAA’s responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

XII. AMENDMENTS

This PA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

XIII. TERMINATION

A. If any signatory to this PA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation XII, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the PA upon written notification to the other signatories.

B. Once the PA is terminated, and prior to work continuing on the undertaking, the FAA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) execute a PA pursuant to 36 CFR § 800.14 or (c) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. The FAA shall notify the signatories as to the course of action it will pursue.
C. Execution of this PA and implementation of its terms evidence that the FAA and USFS have taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

UNITED STATES OF AMERICA
FEDERAL AVIATION ADMINISTRATION

___________________________________________ Date:_______________________
Steve Engebrecht, Acting Manager
Helena Airports District Office

UNITED STATES OF AMERICA
FOREST SERVICE

___________________________________________ Date:_______________________
Mary C. Erickson, Forest Supervisor
Custer Gallatin National Forest

MONTANA STATE HISTORIC PRESERVATION OFFICE

___________________________________________ Date:_______________________
Pete Brown
State Historic Preservation Officer

NEZ PERCE TRIBE

___________________________________________ Date:_______________________
Shannon F. Wheeler, Chairman
Nez Perce Tribe

STATE OF MONTANA – DEPARTMENT OF TRANSPORTATION

___________________________________________ Date:_______________________
Tim Conway
Administrator, Aeronautics Division
APPENDIX A

TO THE PROGRAMMATIC AGREEMENT REGARDING THE PROPOSED CONSTRUCTION OF A NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

Project Layouts and Area of Potential Effect (APE)
Area of Potential Effect (APE) shown by Orange line

Covers areas of terminal area and areas of disturbance for utility improvements.
Area of Potential Effect (APE) shown by Orange line

Covers areas of terminal area and areas of disturbance for utility improvements

The area surrounded by the purple line outlines the area associated with water and fiber optic improvements on National Forest land.
APPENDIX B

TO THE PROGRAMMATIC AGREEMENT REGARDING THE PROPOSED CONSTRUCTION OF A NEW AIRPORT TERMINAL AND ASSOCIATED IMPROVEMENTS AT YELLOWSTONE AIRPORT (WYS) NEAR WEST YELLOWSTONE, MONTANA

Plan for Discovery of Unanticipated Cultural Resources

Cultural resources can be found during any ground-disturbing activity. If a monitor is onsite per Stipulation VII, he/she may determine if the discovery should trigger the procedures described in this document. If no monitor is onsite, all excavation and work in the area must stop, and the procedures as described below must be followed. If in doubt, follow the procedures outlined in this document. Unanticipated discoveries can vary and include evidence or remnants of historic-era and precontact activities by humans. Cultural resources can include, but are not limited to:

- Stone flakes, arrowheads, stone tools, bone or wooden tools, baskets, beads.
- Historic building materials such as nails, glass, metal such as cans, barrel rings, farm implements, ceramics, bottles, marbles, beads.
- Layers of discolored earth resulting from hearth fire
- Structural remains such as foundations
- Shell Middens
- Human skeletal remains and/or bone fragments which may be whole or fragmented.

In the event that previously unknown cultural resources are discovered within the Area of Potential Effects from construction activities of the undertaking, or should those activities directly or indirectly impact known historic properties in an unanticipated manner, the following actions, at a minimum, will be initiated by the FAA, or a representative duly authorized to perform these tasks:

1. All activities will halt in the immediate vicinity of the discovery and all actions that might adversely affect the property will be redirected to an area at least 200 feet from the point of discovery.

2. The FAA and Montana Department of Transportation – Aeronautics Division (MDT) will be notified immediately (within 24 hours), and the FAA will notify MT SHPO and any Indian tribe that might attach religious and cultural significance to the affected property.

   a. If not already onsite, a professional archaeologist who meets the Secretary of the Interior’s qualifications (36 CFR Part 61) will be called in within 48 hours to assess the discovery.
3. Upon arriving at the site of the discovery, the professional archaeologist shall assess the resource. The assessment shall include:
   a. The nature of the resource (e.g., number and kinds of artifacts, presence/absence of features). This may require screening of already disturbed deposits, photographs of the discovery, Global Positioning System (GPS) data, and other necessary documentation. The archeologist will have basic archaeological excavation tools on hand.
   b. The spatial extent of the resource. This may require additional subsurface examination, mapping or inspection, as is appropriate to the resource
   c. The nature of deposition/exposure. This may require interviews with construction personnel and with other persons having knowledge about the resource or the expansion of existing disturbance to establish the characteristics of the deposits.

4. The professional archaeologist will complete a brief summary of the assessment and submit the report to the FAA, USFS, MDT, the Nez Perce Tribe (due to the proximity of the NPNHT), and the MT SHPO within 10 days of fieldwork for further instruction. The FAA will also notify any Indian Tribe that might attach religious and cultural significance to the affected property.

5. The FAA will consult with the USFS, MT SHPO, MDT, and any Indian tribe that might attach religious and cultural significance to the affected property to determine if and when construction activities in the location of the discovery may resume.

6. After consultation, the FAA will issue appropriate determinations of eligibility of any resources discovered and a determination of effect before construction in the location of the discovery may resume. Consistent with 36 CFR § 800.13(b)(3) (Post-review discoveries) Tribes and MT SHPO will have 72 hours to respond to the determinations.

7. If unanticipated discoveries are made on the undertaking, a technical report will be written at the end of the project by the on-site professional archaeologist and will be submitted within four months to the MT SHPO by the FAA. Reports dealing with sensitive information regarding sacred areas or other similar resources of historical or cultural importance to Native Americans will be reviewed only by those who have responsibility for National Register eligibility determinations or management concerns of such properties.

8. Report and documentation efforts shall conform with the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation (48 FR. 44716-44740), as well as with all applicable standards, guidelines, and forms for historic preservation, including Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey (HABS/HAER/HALS) guidance, and guidance established by the MT SHPO.

9. If the unanticipated discoveries may be related to the Nez Perce (Nee-Me-Poo) National Historic Trail, the Nez Perce Tribal Historic Preservation Officer will be notified and the Programmatic Agreement relating to ethnographic study will be reviewed for applicability. The FAA will also notify any other Indian Tribe that might attach religious and cultural significance to the affected property.
10. Points of Contact:

FAA: Diane Stilson, HLN ADO - (406) 441-5411
MDT: Jeff Kadlec, Yellowstone Airport Manager - (406) 459-9825
MT SHPO: Jessica Bush, State Archaeologist – (406) 444-0388
Nez Perce Tribe: Patrick Baird, Tribal Historic Preservation Officer - (208) 791-8610
September 14, 2020

Ms. Dian Stilson, P.E.
FAA Helena Airport District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602-1213

Ref: Determinations of Eligibility and Effect on Historic Properties due to Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, Montana

Dear Ms. Stilson,

Thank you for consulting with the Montana State Historic Preservation Office regarding the project listed above. SHPO concurs with your determination of eligibility that both the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are eligible for the National Register of Historic Places under Criteria A and C. In addition, SHPO concurs with your finding that the removal of these two features under the proposed actions as stated in your consultation package will constitute an adverse effect to these historic properties.

While SHPO is aware that there were informal discussions regarding possible mitigation measures to offset this adverse effect, SHPO would like to invite FAA to draft some possible mitigation efforts to begin the collaborative process of drafting a MOA.

Please do not hesitate to contact me regarding this letter or its contents. I can be reached at 406.444.7717 or at eric.newcombe@mt.gov.

Sincerely,

[Signature]

Eric Newcombe, M.A.
Historic Architecture Specialist
State Historic Preservation Office
Montana Historical Society
P.O. Box 201202/1301 E. Lockey Avenue
Eric.Newcombe@mt.gov
(406) 444-7717
www.montanahistoricalsociety.org
August 20, 2020

Ms. Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602

Ref: Construction of a New Airport Terminal and Associated Improvements at Yellowstone Airport
    West Yellowstone, Gallatin County, Montana
    ACHP Project Number: 15782

Dear Ms. Stilson:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, of our regulations, “Protection of Historic Properties” (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Montana State Historic Preservation Officer (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Anthony Guy Lopez at (202) 517-0220 or by email at alopez@achp.gov.

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs
Advisory Council on Historic Preservation  
Electronic Section 106 Documentation Submittal System (e106) Form  
*MS Word* format  
Send to: *e106@achp.gov*

Please review the instructions at [www.achp.gov/e106-email-form](http://www.achp.gov/e106-email-form) prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. **Purpose of notification.** Indicate whether this documentation is to:
   - [x] Notify the ACHP of a finding that an undertaking may adversely affect historic properties
   - [x] Invite the ACHP to participate in a Section 106 consultation
   - [x] Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
   - [ ] Supply additional documentation for a case already entered into the ACHP record system
   - [ ] File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
   - [ ] Other, please describe
     
     Click here to enter text.

2. **ACHP Project Number** (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below):

None previously filed

3. **Name of federal agency** (If multiple agencies, list them all and indicate whether one is the lead agency):

   Federal Aviation Administration – lead agency;

   U.S. Forest Service – Cooperating Agency

4. **Name of undertaking/project** (Include project/permit/application number if applicable):

   Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, Montana

5. **Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

   West Yellowstone, Gallatin County, Montana – Yellowstone Airport (WYS). The Airport Sponsor is the State of Montana – Department of Transportation (MDT)
6. **Name and title of federal agency official and contact person for this undertaking**, including email address and phone number:

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

Diane.stilson@faa.gov

(406) 441-5411

II. **Information on the Undertaking**

7. **Describe the undertaking and nature of federal involvement** (if multiple federal agencies are involved, specify involvement of each):

The Federal Aviation Administration (FAA) is examining the environmental impacts due to the proposed construction of a new airport terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process.

The Airport Sponsor, the State of Montana - Department of Transportation (MDT), is preparing an Environmental Assessment (EA) for submission to the FAA to meet the requirements of NEPA. Funding for the project is anticipated to be largely through the Airport Improvement Program (AIP) and the Coronavirus Aid, Relief, and Economic Security (CARES) Act as well as constitute a change to the Airport’s Airport Layout Plan (ALP). As the undertaking would include improvements on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA.

The Proposed Action would construct an approximate 29,000 square foot (SF) terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. Associated improvements will also provide an opportunity to improve the airport and the neighboring USFS Jump Base with upgraded water and sewer, as well as new fiber optic infrastructure.

Details of the undertaking are provided in the attached project description and layouts.

8. **Describe the Area of Potential Effects (APE):**

The Area of Potential Effect (APE) corresponds to the terminal area and areas of disturbance for utility corridors as shown on the attached layouts.
9. Describe steps taken to identify historic properties:

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR) for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. No cultural properties were identified in the CRI; however, two historic sites were identified. These historic sites include the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), both of which were documented and recommended in the CRI as eligible to the National Register of Historic Places (NRHP).

The FAA contacted Tribes with historical ties to this area in letters dated August 29, 2019, in order to seek input on properties of cultural or religious significance that may be affected by the undertaking and to initiate Government-to-Government consultation. Eight Tribes were contacted, including the Blackfeet Nation, Coeur d’Alene Tribe, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Kootenai Tribe of Idaho, Nez Perce Tribe, and the Shoshone Bannock Tribes. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) to the project area.

An Addendum to the CRI (Addendum) was conducted in order to examine the routes of the potential extension of water, sewer, and fiber optic lines from the town of West Yellowstone, Montana, to WYS and the USFS Jump Base. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the NPNHT. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural or historic resources, nor any sign of the Great Bannock Trail or NPNHT.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

The FAA considered the recommendations made in the CRI and the Addendum, and concurs with the recommendations regarding historic properties in these documents. The FAA has therefore determined that the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are both eligible to the NRHP under Criteria A and C.

Yellowstone Airport Terminal (24GA1958)

The terminal design (approved by the National Park Service) displays modern stylings combined with western rustic elements (Western Modernism). Bids for the terminal were received in 1964 and the structure was opened for service in 1965. The airport terminal has a canted overhang roof supported by steel beams that, at the time of construction, probably gave the arriving contemporary passenger a feeling of strength, functionality, and efficiency. Understandably, the Yellowstone Airport’s branding focused on the airport’s high elevation and significance as Yellowstone National Park’s west entrance.
With National Park Service funding through the Department of Interior and given its date of construction in 1964 and 1965, the airport terminal design can be associated with the Park Service’s Mission 66 program and policy.

Yellowstone Airport Beacon (24GA1981)

The tower is comprised from 3” pieces of angle steel bolted together at each connection point. The base of the tower measure 12’ square and is orientated NE to SW. The tower is 51 feet tall and has a small platform at the top measuring approximately 4 feet square, which houses the beacon apparatus. A steel ladder without a safety cage is attached to the SE elevation and gives access from the ground to the platform. This beacon tower was relocated to the airport grounds at the same time as the construction of 24GA1958 (the Yellowstone Airport Terminal), circa late 1964 or early 1965, though it is not clear where the tower originated. Jon Axline, historian for the Montana Department of Transportation, suggests that the tower may have been relocated from the old West Yellowstone Airport, which would make logistical and monetary sense given the relative proximity of the two airport sites. In addition, Mr. Axline believes the tower appears to be of the same construction style as those constructed in the 1930s. While the beacon tower is likely of the original construction style as it was pre-relocation, the rotating and lighted beacon equipment has gone through numerous changes as electrical equipment has expended its useful life. While records of the electrical modifications are not available, airport staff noted that modifications have been made as recently as, approximately, 2009.
11. Describe the undertaking’s effects on historic properties:

The FAA has determined that the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are both eligible to the NRHP under Criteria A and C. Both of these sites are proposed for removal under the proposed project actions, which will constitute an Adverse Effect to Historic Properties. Informal discussion of this has been conducted with the Montana SHPO to discuss a mitigation strategy for inclusion in a Memorandum of Agreement (MOA). Formal Section 106 consultation was initiated with SHPO on August 3, 2020.

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

The Proposed Action being evaluated in an Environmental Assessment includes removal of both the Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower.

The Montana Department of Transportation – Aeronautics Division (MDT – Aeronautics) (Airport Sponsor) considered a full range of alternatives to address the deficiencies and needs at WYS. These alternatives include taking no action to resolve the identified deficiencies, and various alternatives to address terminal and Airport needs.

A 2015 Master Plan and the 2019 Terminal Area Narrative Report identified deficiencies in the existing terminal facilities at WYS and evaluated alternatives to address these deficiencies. The alternatives specific to the terminal included: rehabilitating the terminal building in place, constructing a new terminal building and repurposing the existing terminal, and alternatives involving the construction of a new terminal building and demolition of the existing terminal.

Ultimately, as discussed in Chapter 3 of the Environmental Assessment (not yet released for public comment), taking no action, rehabilitating the terminal in place, or constructing a new terminal and repurposing the existing terminal either did not address the purpose and need or were not feasible
alternatives.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawaiian organizations, or the public, including any correspondence from the SHPO and/or THPO.

* see Instructions for Completing the ACHP e106 Form

The FAA contacted Tribes with historical ties to this area in letters dated August 29, 2019, in order to seek input on properties of cultural or religious significance that may be affected by the undertaking and to initiate Government-to-Government consultation. Eight Tribes were contacted, including the Blackfeet Nation, Coeur d’Alene Tribe, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Kootenai Tribe of Idaho, Nez Perce Tribe, and the Shoshone Bannock Tribes. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) to the project area.

An Addendum to the CRI (Addendum) was conducted in order to examine the routes of the potential extension of water, sewer, and fiber optic lines from the town of West Yellowstone, Montana, to WYS and the USFS Jump Base. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the NPNHT. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural or historic resources, nor any sign of the Great Bannock Trail or NPNHT.

In letters dated March 20, 2020, the Cultural Resources Investigation and the Addendum were sent to the Tribes that were previously contacted in August of 2019 to again extend the invitation for Government-to-Government consultation and seek input on properties of cultural or religious significance that may be affected by the Proposed Action. The Nez Perce Tribe responded that the impact of this project cannot be determined without ethnographic studies and interviews with elders to obtain their memories and recollections passed to them regarding the Nez Perce experience in this area due to the 1877 flight of the Nez Perce from their homelands while pursued by the U.S. Army. The Confederated Salish and Kootenai Tribes of the Flathead Reservation and Shoshone Bannock Tribes confirmed that they had no additional comments regarding the project; the other Tribes did not respond.

Consultation with the Nez Perce continued in the form of several telephone conferences with MDT, the FAA, and FS in the spring of 2020. The MDT, FAA, and the USFS agree that while the location of the undertaking falls outside the designated location of the NPNHT, the events of 1877 were a tragic and significant event in which approximately 800 Nez Perce passed through the general area as they were pursued by the U.S. Army. As noted by the Nez Perce Tribal Historic Preservation Officer (THPO), the importance of finding remaining artifacts from the flight of the Nez Perce is over-shadowed by the impact of the events themselves upon the Nez Perce of the time, and lasting impacts of such events on current Tribal members. While there was no physical evidence of this event found in the project area; as requested by the Nez Perce and agreed to by MDT and the Federal Agencies, ethnographic studies are the appropriate means to determine if there will be adverse impacts on the Tribe due to the undertaking. However, ethnographic studies can often take years to accomplish properly; especially in consideration of the current environment of COVID-19. As suggested by the Nez Perce THPO and allowed by FAA Order 1050.1P when effects on historic properties cannot be fully determined prior to the approval of an undertaking, a Programmatic Agreement (PA) is proposed to be developed in order to conduct ethnographic studies and recommend mitigation elements if adverse effects to the Nez Perce Tribe or the NPNHT are identified. Details of the PA will be coordinated with SHPO, Nez Perce, MDT, FAA, and the
USFS; and the Nez Perce will be a signatory on the document.

Informal discussions regarding the NRHP-eligible terminal and beacon tower have taken place with Montana SHPO since the summer of 2019, including an in-person meeting with MDT, FAA, and SHPO in December 2019 to discuss adverse effects and a mitigation strategy for inclusion in an MOA. Formal section 106 consultation was initiated with SHPO in a letter dated August 3, 2020.

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP’s review response.

Section 106 Consultation was formally initiated with MT SHPO on August 3, 2020; however, informal discussions regarding adverse impacts to the terminal and beacon tower have taken place since summer 2019. A meeting to discuss a potential mitigation strategy for inclusion in an MOA was held in December 2019.

As stated in response to question #13, a Programmatic Agreement (PA) is proposed to be developed in order to conduct ethnographic studies and recommend mitigation elements if adverse effects to the Nez Perce Tribe or the NPNHT are identified. Details of the PA will be coordinated with SHPO, Nez Perce, MDT, FAA, and the USFS; and the Nez Perce will be a signatory on the document.

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

Not at this time. Once ready for release, the draft EA will be made available for public comment.

A public meeting was held at WYS to discuss the proposed improvements in September 2019.

16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

The EA for terminal improvements is listed on the dashboard.


The following are attached to this form (check all that apply):

☐ Section 106 consultation correspondence (CAN BE PROVIDED IF REQUESTED)

☒ Maps, photographs, drawings, and/or plans

☐ Additional historic property information

☐ Consulting party list with known contact information

☐ Other: Click here to enter text.
August 3, 2020

Pete Brown
State Historic Preservation Officer
The Montana Historical Society
1301 Lockey Ave
Second Floor
Helena, MT 59620-1201

Subject: Initiation of Section 106 Consultation and Determinations of Eligibility and Effect on Historic Properties due to Proposed Construction of New Airport Terminal and Associated Improvements at Yellowstone Airport near West Yellowstone, Montana

Dear Mr. Brown:

The Federal Aviation Administration (FAA) is examining the environmental impacts due to the proposed construction of a new airport terminal and associated improvements (undertaking) at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and terminal layouts are enclosed with this letter. The Area of Potential Effect (APE) corresponds to the terminal area and areas of disturbance for utility corridors as shown on the attached layouts. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The FAA has spoken informally with your staff regarding the historic concerns from the undertaking, but this letter is being sent to formally initiate Section 106 consultation.

The Airport Sponsor, the State of Montana - Department of Transportation (MDT), is preparing an Environmental Assessment (EA) for submission to the FAA to meet the requirements of NEPA. As the undertaking would include improvements on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA.

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR) for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. No cultural properties were identified in the CRI; however, two historic sites were identified. These historic sites include the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981), both of which were
documented and recommended in the CRI as eligible to the National Register of Historic Places (NRHP).

The FAA contacted Tribes with historical ties to this area in letters dated August 29, 2019, in order to seek input on properties of cultural or religious significance that may be affected by the undertaking and to initiate Government-to-Government consultation. Eight Tribes were contacted, including the Blackfeet Nation, Coeur d'Alene Tribe, Confederated Salish and Kootenai Tribes of the Flathead Reservation, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Kootenai Tribe of Idaho, Nez Perce Tribe, and the Shoshone Bannock Tribes. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT) to the project area.

An Addendum to the CRI (Addendum) was conducted in order to examine the routes of the potential extension of water, sewer, and fiber optic lines from the town of West Yellowstone, Montana, to WYS and the USFS Jump Base. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the NPNHT. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural or historic resources, nor any sign of the Great Bannock Trail or NPNHT.

Both the CRI and Addendum and any associated site forms will be uploaded to the Montana Cultural Resource Database.

The FAA considered the recommendations made in the CRI and the Addendum, and concurs with the recommendations regarding historic properties in these documents. The FAA has therefore determined that the Yellowstone Airport Terminal (24GA1958) and the Yellowstone Airport Beacon Tower (24GA1981) are both eligible to the NRHP under Criteria A and C. Both of these sites are proposed for removal under the proposed project actions, which will constitute an Adverse Effect to Historic Properties. Informal discussion of this has been conducted with the Montana SHPO to discuss a mitigation strategy for inclusion in a Memorandum of Agreement (MOA).

In letters dated March 20, 2020, the CRI and the Addendum were sent to the Tribes that were previously contacted in August of 2019 to again extend the invitation for Government-to-Government consultation and seek input on properties of cultural or religious significance that may be affected by the Proposed Action. The Nez Perce Tribe responded that the impact of this project cannot be determined without ethnographic studies and interviews with elders to obtain their memories and recollections passed to them regarding the Nez Perce experience in this area due to the 1877 flight of the Nez Perce from their homelands while pursued by the U.S. Army. The Confederated Salish and Kootenai Tribes of the Flathead Reservation and Shoshone Bannock Tribes confirmed that they had no additional comments regarding the project; the other Tribes did not respond.

MDT, FAA, and the USFS agree that while the location of the undertaking falls outside the designated location of the NPNHT, the events of 1877 were a tragic and significant event in which approximately 800 Nez Perce passed through the general area as they were pursued by the U.S. Army. As noted by the Nez Perce Tribal Historic Preservation Officer (THPO), the importance of finding remaining artifacts from the flight of the Nez Perce is over-shadowed by the impact of the events themselves upon the Nez Perce of the time, and lasting impacts of such
events on current Tribal members. While there was no physical evidence of this event found in the project area; as requested by the Nez Perce and agreed to by MDT and the Federal Agencies, ethnographic studies are the appropriate means to determine if there will be adverse impacts on the Tribe due to the undertaking. However, ethnographic studies can often take years to accomplish properly; especially in consideration of the current environment of COVID-19. As suggested by the Nez Perce THPO and allowed by FAA Order 1050.1F when effects on historic properties cannot be fully determined prior to the approval of an undertaking, a Programmatic Agreement (PA) is proposed to be developed in order to conduct ethnographic studies and recommend mitigation elements if adverse effects to the Nez Perce Tribe or the NPNHT are identified. Details of the PA will be coordinated with SHPO, Nez Perce, MDT, FAA, and the USFS; and the Nez Perce will be a signatory on the document.

Please review the enclosed documentation and provide either your concurrence or non-concurrence on FAA’s determinations on historic properties and the proposed strategy for addressing the Nez Perce’s concerns regarding the NPNHT. You can provide your response, comments, or recommendations to me at diane.stilson@faa.gov or send them to me at the following address:

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

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

The Advisory Council of Historic Preservation (ACHP) is being notified that we will be developing an MOA and a PA for this project.

Thank you in advance for any comments or information you have to offer, and we look forward to working with you to develop an MOA and PA.

Sincerely,

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

Enclosures:
- Project Description and Project Layouts
- Letters sent to Tribes dated August 29, 2019
- Letters sent to Tribes dated March 20, 2020

cc: (Via e-mail)
Jason Brey, District Ranger, U.S. Forest Service
Jeff Kadlec, WYS Airport Manager
Tim Conway, Administrator, Montana Aeronautics Division
Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
HLN ADO
Project Description:

The Montana Department of Transportation - Aeronautics Division (MDT) owns and operates the Yellowstone Airport (Airport) near West Yellowstone, Montana. MDT is proposing improvements at the Airport that would provide an updated and safe terminal building and associated improvements, and has initiated preparation of an Environmental Assessment (EA) for submission to the Federal Aviation Administration (FAA). As the Proposed Action would include improvements on National Forest lands and the United States Forest Service (USFS) West Yellowstone Interagency Fire Center (Jump Base), the USFS is a cooperating agency in the preparation of the EA.

The Proposed Action would construct an approximate 29,000 square foot (SF) terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. Associated improvements will also provide an opportunity to improve the airport and the neighboring USFS Jump Base with upgraded water and sewer, as well as new fiber optic infrastructure. The following improvements are required to complete the Proposed Action, with major components identified on Figures 1 and 2:

- New terminal building
  - Construct approximate 29,000 SF terminal with space for entry, lobby, seating, screening, passenger hold room, concessions, non-secure and secure area restrooms, airlines and ticketing, baggage drop/screening and handling/lobby, airport administration, Traffic Security Administration (TSA), rental cars, educational kiosks/display areas, mechanical systems and storage area(s), among other airport terminal related uses.
  - Demolish the existing airport terminal building and generator building
- Expand concrete commercial parking pad
- Reconstruct and extend airport access road
  - Reconstruct the existing access road from HWY 191 to the area fronting the existing terminal building
  - Extend the airport access road to the front of the new terminal building to facilitate access to proposed airport parking and the terminal
- Construct new parking lot infrastructure
  - Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
  - Relocate existing car wash pad facilities for two resident rental car providers
- New water infrastructure improvements
  - Extend water main infrastructure from the town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the airport. There will be a clearing width of approximately 30 feet, where necessary.
  - While USFS Jump Base site-specific water improvements are not proposed as part of the project, nor eligible for FAA funding assistance, the system is proposed to be sized to accommodate projected needs should the USFS desire to connect in the future. The water main is proposed to be routed to facilitate connection in the immediate vicinity of the USFS Jump Base.
  - Water improvements from the town are proposed to be looped to provide a continuous system versus a dead-end line to provide improved water and fire flow pressures and for redundancy in service.
- An alternative that is being carried forward for analysis in the event that connection to town facilities is somehow determined to be unfeasible is the establishment of an onsite water system (well, tank, arsenic removal system, distribution lines) that is identified as Alternative W1. Such improvements would be located on the airport property and considered for extension to serve the USFS Jump Base.

- Occasional maintenance of the new water infrastructure improvements on NFS lands. This activity would be carried out under a special use authorization that will be issued to the State or Town (depending on final ownership of infrastructure) for the improvements and their operation and maintenance. It is expected that maintenance requiring motorized use on the utility corridor would be infrequent, and would generally address maintenance of the corridor, weed management, and maintenance of barriers that will prevent public motorized use of the utility corridor.

> New sewer infrastructure improvements

- Extend existing gravity sewer main from existing lift station near the Snow Removal Equipment (SRE) building and Fixed Based Operator (FBO) north to a proposed lift station located near the USFS Jump Base adjoining the airport. This lift station is proposed with this project as current grades and distances are such that gravity sewer alone is not able to facilitate connection to West Yellowstone sewer treatment facilities.

- Extend a sewer force main from the proposed lift station south to the existing town of West Yellowstone sewer lagoons, located on the south end of the airport property.

- While the USFS Jump Base sanitary sewer improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accept such effluent, should the USFS desire to connect in the future.

- Most of the sewer infrastructure improvements will occur within the existing animal control fence. There will be approximately 200 feet outside of the fence at the south end before it ties into the existing lagoon.

- An alternative that is being carried forward for analysis in the event that connection to town facilities is somehow determined to be unfeasible is the establishment of an onsite Type 2 septic system with gravity and potential force main infrastructure that is identified as Alternative S1. Such improvements would be located on the airport property and considered for extension to serve the USFS Jump Base.

> New fiber optic infrastructure improvements

- Extend fiber optic infrastructure (buried in conduit) from the town of West Yellowstone to the new terminal, existing terminal area structures (ARFF and SRE buildings and FBO), and USFS Jump Base adjoining the airport.

- Fiber optic is proposed to be collocated in the same trench as the water line from the town of West Yellowstone. In event that the designers determine it is best to offset the utilities, fiber optic can be trenched or plowed in adjacent to the water line alignment. There is no perceived need to disturb any areas outside of those already proposed to facilitate water main installation.

- Occasional maintenance of the new fiber optic infrastructure improvements on NFS lands. This activity would be carried out under a special use authorization that will be issued to the utility company for the improvements and their operation and maintenance. As fiber and water infrastructure improvements would be collocated, refer to the description of this activity under the water infrastructure section above.
Timber clearing to facilitate subsurface utilities (i.e. water, sewer, and fiber optic)

- Timber clearing along the Madison Addition is anticipated to require the removal of up to a 30’ width of timber at the USFS/private property interface (on USFS property) along the west and north sides of the Madison Addition, as well as from the existing jeep trail to the intersection of Bechler Avenue.
- In areas where infrastructure can be installed and reasonably allow timber to remain within the 30’ clearing limits, then such timber will be allowed to remain. Such determinations will be dependent on water main and fiber location in regards to timber location, timber density, and timber presence along the edges of the 30’ clearing. Along all other areas, it is anticipated that up to an additional 10’ perpendicular from existing corridors (jeep trail, airport access road, overhead power line, and Jump Base access road) will require timber removal.
- Below is the estimated acreage of timber clearing that will take place outside of the animal control fence, broken out by clearing location:
  - Temporary (new) clearings bordering the Madison Addition (30’ width anticipated) – 4.13 acres
  - Jeep Trail (10’ width anticipated) – 1.18 acres
  - Airport Access Road (10’ width anticipated) – 0.63 acres
  - Overhead Power Line (10’ width anticipated) – 0.26 acres
  - Jump Base Access Road (10’ width anticipated) – 0.47 acres
- An estimated 3 acres of timber will be cleared within the existing animal control fence and will not impact currently available grizzly bear habitat. The majority of project activities will occur in or near previously disturbed areas (terminal area, apron, runway, animal control fence, overhead power lines, pilot camp ground, previous clear-cut to clear the airport property in the 1960’s, and Jump Base).
- With Alternatives W1 and S1 being able to be completed on airport property, the extent of tree clearing is less (approximately 15% as compared extension of utilities from Town) to facilitate installation of on-site infrastructure. Below is the estimated acreage of timber clearing that will take place within the confines of the airport property and animal control fence:
  - Water tank / well to south of terminal – 1.0 acres (approximate 200’x200’ behind a timbered buffer from the airfield and terminal area).
  - Water / sewer alignment extension to USFS Jump Base – 0.52 acres (widening of existing clearing along the inside of the animal control fence by approximately 20’).
  - Sewer Level 2 septic system with drain field – 4.13 acres (approximate 300’x600’ for drain field and infrastructure behind a timbered buffer from the airfield.

Replacement of the existing airport beacon with a new beacon and tower.

Those bulleted items noted above are what constitutes the proposed action for immediate near-term development. Such infrastructure will support existing airport uses, as well as accommodate inherent growth of the aviation needs for the near term. Additional infrastructure (i.e. parking lots to the north and south side of the terminal) is presented in Figure 2 (cross hatched areas) for planning purposes only, and represents what is anticipated to be needed to accommodate the forecast growth at the airport over the latter portion of the 20-year planning period. The actual size of improvement footprint(s), final locations, and project specific aspects of the terminal, parking lot, access road, and other improvements will be determined in the design phase of the project, following completion of the environmental analysis. Improvements
are anticipated to be the same or very similar in size and layout as identified herein. Future actions not identified herein as a project element of the proposed action will be subject to National Environmental Policy Act (NEPA) and MEPA (Montana Environmental Policy Act) review and consulted on as appropriate in association with the development of those projects and in advance of any proposed project implementation.
STATE OF MONTANA HIGH PERFORMANCE BUILDING STANDARD GOALS
STATE OF MONTANA
HIGH PERFORMANCE BUILDING STANDARDS GOALS

Based on the 61st Legislature SB049, amending Section 17-7-201 MCA, and enacted under 17-7-202 MCA, the Department of Administration (through its Architecture & Engineering Division) establishes High-Performance Building Standards for the construction, renovation, and maintenance of public buildings in this state as well as all new state-leased buildings. (1.a) These standards have been developed to improve the capacity of the state to design, build, and operate high-performance and resilient buildings. An integrated design process to optimize energy performance, enhance indoor environmental quality and conserve natural resources are encouraged for all projects. (2.a)

The overall goal of the HPBS is that state-owned and/or leased buildings will meet construction and operational standards that are cost-effective and:

1. Exceed the International Energy Conservation Code most recently adopted by the department of labor and industry by 20% or to the extent that is cost-effective over the life of the building or major renovation (1.b).

2. Increase the use of environmentally and socially sustainable building materials, finishes, and furnishings from Montana and within the region with an emphasis on functionality, durability, and maintenance (2.d);

3. Encourage comprehensive energy plans for buildings that implement energy efficiency, passive design, utilization of local energy sources and local renewable energy sources;

4. Protect and conserve the natural resources of the state (2.a);

5. Reduce and properly manage waste generation;

6. Establish life-cycle cost analysis as the appropriate and most efficient analysis to determine the cost-effectiveness, including productivity, deferred maintenance, and operational considerations (2.b) of a building project;

7. Continue to ensure that the systems of each building project are designed, installed, and tested to perform according to the design intent and operational needs of the building;

8. Implement a comprehensive data base for all high-performing buildings;

9. The State Agency for whom the Project was built shall strive to operate and maintain all State Projects at optimal efficiency, providing a healthy working environment, and controlling long-term cost.

10. Develop building plans and other long-term strategic planning processes to incorporate the concepts of high performance buildings.

END OF HIGH PERFORMANCE BUILDING STANDARDS GOALS
EFFECTIVE DATE: DECEMBER 1, 2013
1.1 DESIGN AND DOCUMENTATION
A. Incorporate an integrated design process.
B. Integrate cost-effectiveness analysis early in the project.
C. Incorporate Contracting Agency Minimum Design Standards.
D. The Checklist for Minimum Requirements (Exhibit B) shall be maintained and completed by the Contracting Agency.

1.2 SUSTAINABLE SITES
A. Comply with the intent of Construction Activity Pollution Prevention (LEED SS Prerequisite 1). Reduce pollution from construction activities by controlling soil erosion, waterway sedimentation and airborne dust generation.
B. Comply with the intent of Construction on Appropriate Sites (LEED Credit SS 1). Avoid development of inappropriate sites and reduce the environmental impact from the location of a building on a site.
C. Comply with the intent of Protect and Restore Habitat (MT regional priority LEED Credit SS 5.1). Conserve existing natural areas and restore damaged areas to provide habitat and promote biodiversity.
D. Comply with the intent of Stormwater Design Quantity Control (LEED Credit SS 6.1). Limit disruption of natural hydrology by reducing impervious cover, increasing on-site infiltration, reducing or eliminating pollution from stormwater runoff and eliminating contaminants.
E. Comply with the intent of Light Pollution Prevention (LEED Credit SS 8). Minimize light trespass from the building and site, reduce sky-glow to increase night access, improve nighttime visibility through glare reduction and reduce development impact from lighting on nocturnal environments.

1.3 WATER EFFICIENCY
A. Comply with Water Use Reduction by 20% (ASHRAE, LEED WE Prerequisite 1). Increase water efficiency within buildings to reduce burden on municipal & ground source water supply and wastewater systems.
B. Comply with the intent of Water Efficiency in Landscape and Irrigation (LEED WE Credit 1). Limit or eliminate the use of potable water or other natural
ADOPTED VERSION 1

surface or subsurface water resources available on or near the project site for landscape irrigation.

1.4 ENERGY & ATMOSPHERE

A. Exceed current Int'l Energy Conservation Code by 20% (MT legislation).

B. Comply with the intent of Fundamental Building Systems Commissioning (MT A&E requirement, LEED EA Prerequisite 1). Verify that the project's energy-related systems are installed, calibrated, and perform according to the owner's project requirements (OPR), basis of design (BOD), and construction documents.

C. Comply with the intent of Fundamental Refrigerant Management (LEED EA Prerequisite 2). Reduce stratospheric ozone depletion through zero use of chlorofluorocarbon (CFC)-based refrigerants in new base building heating, ventilating, air conditioning, and refrigeration (HVAC&R) systems.

1.5 MATERIALS & RESOURCES

A. Comply with the intent of Storage and Collection of Recyclables / Composting (LEED MR Prerequisite 1, Green Globes). Facilitate the reduction of waste generated by building occupants that is hauled to and disposed of in landfills and incinerators.

B. Comply with the intent of Recycled Content (LEED Credit MR 4). Increase demand for building products that incorporate recycled content materials, thereby reducing impacts resulting from extraction and processing of virgin materials.

C. Comply with the intent of Regional Materials (LEED Credit MR 5). Increase demand for building materials and products that are extracted and manufactured within the region, thereby supporting the use of indigenous resources and reducing the environmental impacts resulting from transportation.

D. Comply with the intent of Low-Emitting Materials (LEED Credit IEQ 4.1-4.4 and Green Globes). Reduce the quantity of indoor air contaminants that are odorous, irritating and/or harmful to the comfort and well-being of installers and occupants. Products include adhesives and sealants, paints and coatings, flooring systems, composite woods and agrifibers, and furniture.

E. Comply with the intent of Building Durability, Adaptability, and Disassembly (Green Globes). Specify durable and low-maintenance building materials and assemblies that can withstand the following: sunlight, temperature and humidity changes, condensation, and wear-and-tear associated with the amount and type of traffic expected; implement a building design that promotes building adaptability; Specify fastening systems that allow for easy disassembly.
1.6 INDOOR ENVIRONMENTAL QUALITY

A. Comply with the intent of Minimum indoor Air Quality Performance (ASHRAE 62.1-current, LEED IEQ Prerequisite 1). Establish minimum indoor air quality (IAQ) performance to enhance indoor air quality in buildings, thus contributing to the comfort and well-being of the occupants. Meet ASHRAE-62.1, current version.

B. Comply with the intent of Environmental Smoke Control (State Facilities mandate, LEED IEQ Prerequisite 2). Prevent or minimize exposure of building occupants, indoor surfaces, and ventilation air distribution systems to environmental smoke.

C. Comply with the intent of Construction IAQ Management Plan (LEED IEQ Credit 3.1/3.2). Reduce indoor air quality (IAQ) problems resulting from construction or renovation and promote the comfort and well-being of construction workers and building occupants. Develop and implement plan during both construction and prior to occupancy.

D. Comply with the intent of Indoor Chemical and Pollutant Source Control (LEED IEQ Credit 5). Minimize building occupant exposure to potentially hazardous particulates and chemical pollutants.

E. Comply with the intent of Controllability of Systems—Lighting (LEED IEQ 6.1) Provide a high level of lighting system control by individual occupants or groups in multi-occupant spaces and promote their comfort and well-being.

F. Comply with the intent of Controllability of Systems—Thermal Comfort (LEED IEQ 6.2) Provide a high level of thermal comfort system control by individual occupants or groups in multi-occupant spaces and promote their comfort and well-being. Definition of thermal comfort shall be as defined by LEED as control over at least 1 of the following primary factors in the occupant's vicinity: air temperature, radiant temperature, air speed and humidity.

G. Comply with the intent of Daylight and Views—Daylight (LEED IEQ 8.1) Provide building occupants with a connection between indoor spaces and the outdoors through introduction of daylight and views into the regularly occupied areas of the building.

H. Comply with the intent of Acoustic Comfort (Green Globes) Provide optimum protection from undesirable outside noise. Specify appropriate sound transmission class rating of perimeter walls in response to external noise levels. Provide noise attenuation of the structural systems and measures to insulate primary spaces from impact noise. Specify acoustic controls to meet the acoustic privacy requirements. Specify measures to meet speech intelligibility and requirements for various spaces and activities. Mitigate acoustic problems associated with mechanical equipment and plumbing systems noise and vibration.
1.7 OPERATIONS AND MAINTENANCE

A. Comply with the Intent of Water Performance Measurement (LEED-EB: O&M WE Credit 1). Measure building and major subsystem water performance over time to understand consumption patterns and identify opportunities for additional water savings. (LEED-EB: O&M suggests whole building metering or sub-metering of irrigation, indoor plumbing fixtures and fittings, cooling towers, domestic hot water, and other process water.)

B. Comply with Energy Efficiency Best Management Practices—Planning, Documentation, and Opportunity Assessment. (LEED-EB: O&M EA Prerequisite 1) Promote continuity of information to ensure that energy-efficient operating strategies are maintained and provide a foundation for training and system analysis. (Develop a building operations manual that includes an occupancy schedule, equipment run-time schedule, design set points for all HVAC equipment, and design lighting levels throughout the building. Provide a systems narrative describing the mechanical and electrical systems and a preventive maintenance plan for equipment.)

C. Comply with Title 75, Chapter 10 MCA Waste and Litter Control.

D. Minimum Indoor Air Quality Performance (LEED-EB: O&M IEQ Prerequisite 1) By meeting Indoor Environmental Quality (1.6 A.) current version of ASHRAE 62.1, buildings and renovations will comply with this standard. However, ongoing compliance with ASHRAE 62.1 requires implementation and maintenance of an HVAC system maintenance program to ensure the proper operations and maintenance of HVAC components as they relate to outdoor air introduction and exhaust; also testing and maintenance in the operation of all building exhaust systems, including bathrooms, shower, kitchen and parking exhaust systems and on-going training of facility personnel. A minimum building automation system (BAS) for control monitoring and verification including an automated fault detection for effective O&M energy use monitoring and notification shall be incorporated into the project.


F. High-Performance Building Education. (LEED and Green Globes). Develop and provide opportunities for education on sustainable technologies, policies, and processes appropriate to the building for occupants, visitors, and maintenance personnel. (Suggested opportunities include short case studies, web-based materials, tours, signage, brochures, public presentations, educational learning sessions, advanced maintenance training, professional development, etc.)

G. Post-Occupancy Evaluation. Provide ongoing training for commissioned buildings, develop a one-year warranty check that includes an opportunity to obtain occupant feedback; develop a process for addressing thermal comfort complaints if more than 20% of occupants are dissatisfied.

END OF HPBS MINIMUM REQUIREMENTS FOR ALL PROJECTS
EFFECTIVE DATE: DECEMBER 1, 2013
AGENCY CORRESPONDENCE
April 26, 2021

Greater Yellowstone Coalition
Attn: Joe Josephson, Senior Montana Conservation Associate
215 South Wallace Avenue
Bozeman, MT 59715

RE: Yellowstone Airport – Notice of Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Josephson:

Based on your agency providing comments on prior project(s) at the Yellowstone Airport, we are advising you of an open public comment period for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: http://mdt.mt.gov/pubinvolvé/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by public agencies as a result of the initial solicitation for comment at the beginning of the EA.

The 30-day public comment period for this draft EA begins on Sunday, April 25th, 2021. Comments will be received through Tuesday, May 25th, 2021. Comments may be provided by utilizing the public comment feature at the bottom of the EA webpage at the following link: https://mdt.mt.gov/pubinvolvé/yellowstoneairport/. Comments may also be hand delivered to the Yellowstone Airport Manager’s Office, Attn: Jeff Kadlec, 721 Airport Road, West Yellowstone, MT 59758, or to Morrison-Maierle, Attn: Travis Eickman, 2880 Technology Blvd. West, Bozeman, MT 59718, and must be received by 5:00 p.m. on May 25th, 2021. Comments may also be mailed to Morrison-Maierle, Attn: Travis Eickman, 2880 Technology Blvd. West, Bozeman, MT 59718 and must be postmarked no later than May 25th, 2021.

Any comments received within the identified public comment period will be incorporated into the final EA document that will be submitted to the Federal Aviation Administration (FAA) for the final determination on environmental impacts. The Montana Department of Transportation (MDT) – Environmental Division will be a signatory to the EA as the lead State agency. The United States Forest Service (USFS) will be a signatory to the EA as a cooperating agency since certain improvements are proposed on lands administered by the USFS. Should your office desire to provide any initial or additional comments regarding this EA, please provide your response as noted above by May 25th, 2021.
If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

National Parks Conservation Association
Attn: Yellowstone Program Manager
321 East Main Street, Suite 320
Bozeman, MT 59715

RE: Yellowstone Airport – Notice of Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

To Whom It May Concern:

Based on your agency providing comments on prior project(s) at the Yellowstone Airport, we are advising you of an open public comment period for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: http://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by public agencies as a result of the initial solicitation for comment at the beginning of the EA..

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

U.S. Army Corps of Engineers
Montana Regulatory Office
Attn: Jade Clabaugh, Regulatory Project Manager
10 West 15th Street, Suite 2200
Helena, MT 59626

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Ms. Clabaugh:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

U.S. Department of Interior – Bureau of Land Management
Montana/Dakotas State Office
Attn: John Mehlhoff, State Director
5001 Southgate Drive
Billings, MT 59101

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Mehlhoff:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Montana Department of Environmental Quality
Attn: Shaun McGrath
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. McGrath:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mt.dot.gov/pub involve/yellowstoneairport/ In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Department of Natural Resources and Conservation
1625 11th Avenue
Helena, MT 59620

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

To Whom It May Concern:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolves/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Federal Aviation Administration, Helena ADO
Attn: Diane Stilson, Environmental Specialist and Airport Engineer
FAA Building, Suite 2
2725 Skyway Drive
Helena, MT 59602

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Ms. Stilson:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Montana Department of Fish, Wildlife, and Parks
Region 3 Headquarters
1400 South 19th Avenue
Bozeman, MT 59718

RE: Yellowstone Airport — Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

To Whom It May Concern:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolv/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Gallatin County Commission
311 West Main, Room 306
Bozeman, MT 59715

RE: Yellowstone Airport — Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Commissioners:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: http://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Gallatin County Conservation and Parks
Attn: Michael Harris
311 West Main, Room 304
Bozeman, MT 59715

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Harris:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: http://mdt.mt.gov/pubinvolv/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Gallatin County Planning Department  
Attn: Sean O’Callaghan, Planning Director  
311 West Main, Room 108  
Bozeman, MT 59715

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. O’Callaghan:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Gallatin County Road & Bridge Department
205 Baxter Lane West
Bozeman, MT 59718

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

To Whom It May Concern:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvo/ewl/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Gallatin County Sheriff
Attn: Dan Springer
615 S. 16th Avenue, Room 22
Bozeman, MT 59715

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Sheriff Springer:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Hebgen Basin Fire District
Attn: Shane Grube, Fire Chief
10 South Faithful Street
West Yellowstone, MT 59758

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Chief Grube:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

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Sincerely,

Morrison-Maierle, Inc.

[Signature]
Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Montana Department of Transportation – Aeronautics Division
Attn: Tim Conway, Administrator
P.O. Box 200507
Helena, MT 59620

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Conway:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: [https://mdt.mt.gov/pubinvolv/yellowstoneairport/](https://mdt.mt.gov/pubinvolv/yellowstoneairport/) In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Montana Natural Heritage Program
1515 East 6th Avenue
Helena, MT 59620-1800

RE: Yellowstone Airport — Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

To Whom It May Concern:

On September 26, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Montana Historical Society
State Historic Preservation Office
Attn: Damon Murdo, Cultural Records Manager
P.O. Box 201201
Helena, MT  59620-1201

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Murdo:

On September 6, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Natural Resources Conservation Service  
Attn: Kale Gullet, State Resource Conservationist  
10 East Babcock, Room 443  
Bozeman, MT 59715

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Gullet:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: [https://mdt.mt.gov/pubinvolve/yellowstoneairport/](https://mdt.mt.gov/pubinvolve/yellowstoneairport/). In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

United States Department of Agriculture – Custer Gallatin National Forest
Hebgen Lake Ranger District
Attn: Jason Brey, District Ranger
330 Gallatin Road
West Yellowstone, MT 59758-0520

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Brey:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: http://mt.dot.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

United States Department of Agriculture – Custer Gallatin National Forest
Supervisors Office
Attn: Mary Erickson, Forest Supervisor
P.O. Box 130
Bozeman, MT 59771

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Ms. Erickson:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolve/yellowstoneairport/ In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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Sincerely,

Morrison-Maierle, Inc.

-Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

U.S. Fish and Wildlife Service
Montana Ecological Services Field Office
Attn: Jodi Bush, Field Supervisor
585 Shepard Way
Helena, MT 59601

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Ms. Bush:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

West Yellowstone Chamber of Commerce
P.O. Box 458
West Yellowstone, MT  59758

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

To Whom It May Concern:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Town of West Yellowstone
Attn: Mayor Johnson and Town Council
P.O. Box 1570
West Yellowstone, MT  59758

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mayor Johnson and Town Council:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolved,yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

The 30-day public comment period for this final draft EA begins on Sunday, April 25th, 2021. Comments will be received through Tuesday, May 25th, 2021. Comments may be provided by utilizing the public comment feature at the bottom of the EA webpage at the following link: https://mdt.mt.gov/pubinvolved,yellowstoneairport/. Comments may also be hand delivered to the Yellowstone Airport Manager’s Office, Attn: Jeff Kadlec, 721 Airport Road, West Yellowstone, MT 59758, or to Morrison-Maierle, Attn: Travis Eickman, 2880 Technology Blvd. West, Bozeman, MT 59718, and must be received by 5:00 p.m. on May 25th, 2021. Comments may also be mailed to Morrison-Maierle, Attn: Travis Eickman, 2880 Technology Blvd. West, Bozeman, MT 59718 and must be postmarked no later than May 25th, 2021.

Any comments received within the identified public comment period will be incorporated into the final EA document that will be submitted to the Federal Aviation Administration (FAA) for the final determination on environmental impacts. The Montana Department of Transportation (MDT) – Environmental Division will be a signatory to the EA as the lead State agency. The United States Forest Service (USFS) will be a signatory to the EA as a cooperating agency since certain improvements are proposed on lands administered by the USFS. Should your office desire to provide any initial or additional comments regarding this EA, please provide your response as noted above by May 25th, 2021.
If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Town of West Yellowstone Parks & Recreation  
Attn: Irma Vazquez, Recreation Coordinator  
P.O. Box 1570  
West Yellowstone, MT 59758

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Ms. Vazquez:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: [https://mdt.mt.gov/pubinvolve/yellowstoneairport/](https://mdt.mt.gov/pubinvolve/yellowstoneairport/). In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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AN EMPLOYEE-OWNED COMPANY • AN EQUAL OPPORTUNITY EMPLOYER — MINORITIES / FEMALES / DISABLED / VETERANS
If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Town of West Yellowstone Police Department
Attn: Todd Richardson, Chief of Police
P.O. Box 1570
West Yellowstone, MT 59758

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Chief Richardson:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Town of West Yellowstone Public Works Department
Attn: Jon Simms, Superintendent of Public Services
P.O. Box 1570
West Yellowstone, MT 59758

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Simms:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolv/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Town of West Yellowstone
Attn: Acting Town Manager
P.O. Box 1570
West Yellowstone, MT  59758

RE:  Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

To Whom It May Concern:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

The draft EA has now been completed, and is out for a 30-day public comment period. It can be accessed at the following weblink: https://mdt.mt.gov/pubinvolve/yellowstoneairport/. In the event that you are not able to access the document, please advise and we can send you the final draft EA on a USB drive or by other means. This EA incorporates any comments and correspondence that may have been received by your agency and others from that initial solicitation for comment, as well as includes the affected environment evaluation that was not in the initial solicitation.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
April 26, 2021

Yellowstone National Park
Attn: Cameron Sholly, Superintendent
P.O. Box 168
Yellowstone National Park, WY 82190

RE: Yellowstone Airport – Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Sholly:

On August 29, 2019, correspondence was sent to your agency soliciting comments for the construction of a new terminal and terminal area improvements at the Yellowstone Airport, West Yellowstone, Montana. Comments were being solicited for preparation of an Environmental Assessment for the proposed action.

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or via email at teickman@m-m.net.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
Travis,
I was able to connect with Elizabeth LaBroad today with MFWP. She stated that she dug around in the files and none of the communication regarding the proposed project activities indicated a concern. She stated that MFWP has no comment on the proposed project.

Let me know if you need anything further.

Kindly,
Christine

Appreciate all your efforts there. At least we found someone to move this forward. Thanks for bull dogging this. Let me know where we are at tomorrow or Thursday at the latest.

Thanks,

Travis J. Eickman, PE
Senior Airport Engineer, Morrison-Maierle

I left a message with Julie Cunningham, but she is on medical leave until late March.

I did get in touch with Elizabeth LaBroad...she works for the Park division of MFWP. She is going to check files to see if a comment letter was ever prepared. She hopes to get back with us today or tomorrow.
May be worth reaching out to another couple entities within FWP Region 3. May even be a good idea to reach out to Julie Cunningham since she is who the letter went to. Time is of the essence as it is the 11th hour and we could get the go ahead to go to the public in as little as a week. Will defer to your best judgement, but wouldn’t wait too long for a reply.

Thanks,

Travis J. Eickman, PE
Senior Airport Engineer, Morrison-Maierle
406.922.6810 direct | 406.579.9612 mobile

I’ve left a voicemail with Howard Burt, Region 3 Wildlife Manager. I’m not going to place a call to fisheries, since there are no fisheries resources within the project area.

I’ll let you know if I hear back from him.

Thanks,
Christine

See below for FWP contacts provided by MDT.

Thanks,
Mark Deleray retired. Marina Yoshioka is new R3 Admin, I believe. Since she is new, she likely does not have knowledge of this item. Howard Burt is Wildlife Manager and Travis Horton is Fisheries Manager. Betsey LaBroad is Parks Manager. They or their biologists may have some recollection or know where to look for this past correspondence.

Thanks

********************
Deb Wambach
Montana Department of Transportation
Environmental Services Bureau
Butte District Biologist
(406) 444-0461
dwambach@mt.gov

Will do. Correspondence requesting comment was sent to the Region 3 Headquarters on August 29th, 2019.
Thanks – I agree this is a loose end that needs to be addressed.

Travis – can you or Christine call over to the FWP contact to close this loop?

---

Thanks for the info Deb. I agree that some kind of check in is in order so we can show that consultation was completed.

My thought is that a phone call to the FWP person that the initial correspondence was sent to would be good, with a follow up e-mail summarizing the conversation, and asking for a quick concurrence e-mail from them would be more than sufficient. Of course this is based on the assumption that they don’t end up having any major comments that would require re-evaluation of impacts.
My thoughts…

It is somewhat odd that we would not receive response from FWP as they are typically quite responsive in sending letters back. I am not exactly sure how to answer the question, however. Who reached out initially and when? Was there a follow-up? Is there interest in following up now, or is it too late?

I can’t think that there will be anything earth-shattering, but they may provide occurrence information and considerations more specific to the project area than appears to be included in the attached document. It would be courteous to circle up with FWP and ensure their comments have not somehow been overlooked or they missed the call or something.

Thank you

**************************

Deb Wambach
Montana Department of Transportation
Environmental Services Bureau
Butte District Biologist
(406) 444-0461
dwambach@mt.gov

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Monday, March 1, 2021 4:05 PM
To: Gocksch, Tom <tgocksch@mt.gov>; Ridenour, Rebecca <rridenour@mt.gov>; Wambach, Deborah <dwambach@mt.gov>
Cc: Travis J. Eickman <teickman@m-m.net>; Kadlec, Jeff <jkadlec@mt.gov>; Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: [EXTERNAL] RE: WYS EA for terminal improvements - MOA and PA

Tom, Rebecca, Deb,

In the comments I received from Legal on the EA for WYS, a question was asked regarding the lack of response from MT FWP in the Biological Resources section.

The comment is on page 4-9 and another on 4-10. Could you take a look and see if this would be a concern?

Thanks!

Diane Stilson, P.E.
All,

Good news – Pat (THPO for the Nez Perce) informed me that the draft PA associated with terminal improvements at WYS has passed legal review with the Nez Perce and there were no additional comments.

I’ve provided a copy of the finalized .pdf of the PA to Pat in order to get it on the agenda for signature by the Chairman. They next meet on March 16, and if approved, the Chairman will sign probably by the end of the month.

I asked our legal counsel if we could release the draft EA while the final version is circulating for signature. She said that was fine, although added the caveat that if there are changes to the document after we release the draft EA, that we may have to release the PA again for 30 days. According to Pat, there would rarely be changes made after the THPO has endorsed a document, and their legal has reviewed it. I think that it would be a low risk.

Here is my proposal for circulating the PA (and MOA) for signature –

1. As the lead federal agency, the FAA can be the first to sign both documents (MOA and PA),
2. I’ll send the PA to the USFS (as the cooperating federal agency). Note – they are NOT a signatory on the MOA, so don’t need to sign it – Jason – how long does this normally take?
3. I’ll send MOA and PA to MDT for signature
4. Next, I’ll send MOA and PA to SHPO
5. Lastly, I’ll send signed PA to the Nez Perce. If all goes according to plan, the NP can then be the last signatory on the PA

Does that sound like a plan for everyone?

In the meantime, we can move forward with finalizing the draft EA, and hopefully, at least have the MOA signed for inclusion with the draft when it is released for public comment.
I have comments back from our legal on the draft EA. I have just a few follow-on comments that I’ll address with legal and you all (MDT and USFS). I don’t see anything major that we shouldn’t be able to easily address.

Thanks all!

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274
FYI – Here is a reply and e-mail chain I had received from the Coeur d’ Alene Tribe.

They requested I forward them e-copies of the reports, which I provided. I’ve received no other comments at this time from them.

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

From: Jill Wagner <jwagner@cdatribe-nsn.gov>
Sent: Tuesday, March 24, 2020 2:26 PM
To: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: RE: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

Thank you.

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Tuesday, March 24, 2020 12:21 PM
To: Jill Wagner <jwagner@cdatribe-nsn.gov>
Cc: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: RE: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

And here is the second of two e-mails. This one has the addendum, which was for the utility routes for water/sewer.

Thank you!

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Tuesday, March 24, 2020 1:18 PM
To: Jill Wagner <jwagner@cdatrive-ns.gov>
Cc: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: RE: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

First of two e-mails – this one has the Cultural Report for the terminal area...

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Tuesday, March 24, 2020 1:16 PM
To: Jill Wagner <jwagner@cdatrive-ns.gov>
Cc: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: RE: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

Certainly – I am going to send the reports in two e-mails following this one. Please confirm that you receive them, in case there are issues with bandwidth or other technical glitches.

Thank you!

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

From: Jill Wagner <jwagner@cdatrive-ns.gov>
Sent: Tuesday, March 24, 2020 1:09 PM
To: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: RE: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

Yes please. Email the cultural resource reports
We are extremely shortstaffed but will try to get a reply

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Monday, March 23, 2020 1:56 PM
To: Jill Wagner <jwagner@cdatrive-ns.gov>
Jill,

Jill,

See attached for a second letter regarding the construction of a new terminal at WYS. The hard copies and letter were mailed to Chairman Stensgar on Friday, March 20, 2020.

Please let me know if you would like me to e-mail you copies of the cultural reports for this project.

Thanks,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Friday, August 30, 2019 8:26 AM
To: iwagner@cdatribe-nsn.gov
Cc: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: E-copy of initial consultation letter regarding a new terminal at Yellowstone Airport

Good morning Jill,

See attached for a copy of a letter that went out in the mail yesterday to Chairman Stensgar regarding construction of a new terminal at the Yellowstone Airport at West Yellowstone, Montana. Details are included in the letter, but improvements include: construction of a new terminal and associated improvements including (but not limited to): access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

If you are interested, please note that there is a public informational meeting scheduled for 6 p.m. on Monday, September 16th, at the Yellowstone Airport ARFF Building to review the proposed improvements, process and schedule for the EA, and the environmental impact categories that will be evaluated. A question and answer session will follow a short presentation, and public comments will be received at the meeting.

Thanks, and have a great weekend,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
This email and any attached files are confidential and intended solely for the intended recipient(s). If you are not the named recipient(s), you should not read, distribute, copy or alter this message. Any views or opinions expressed herein are those of the author and do not represent those of the Coeur d'Alene Tribe. Warning: Although precautions have been taken to ensure no viruses are present, the Coeur d'Alene Tribe cannot accept responsibility for any loss or damage that may occur from the use of this email or attachments.
Travis J. Eickman

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Monday, April 6, 2020 9:46 AM
To: Travis J. Eickman; kjadlec@mt.gov; tconway@mt.gov; Brey, Jason D -FS
Cc: Stilson, Diane (FAA)
Subject: FW: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

***This message originated from an External Source.*** Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

All,

See below for a response that I’d received from the Nez Perce. My thought is that I should set up a meeting with Pat to discuss his concerns, and my Region concurred with that approach.

Jason – I was thinking that the FS should participate in the call as well? Do you or your folks have any insight or experience with the Nez Perce that would help?

He’s not requesting specifically Government-to-Government consultation, which leaves the door open for Travis and MDT to participate on the call. Thoughts?

Thanks,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

From: Keith P Baird <keithb@nezperce.org>
Sent: Friday, March 27, 2020 10:54 AM
To: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Cc: Nakia Williamson <naklaw@nezperce.org>
Subject: RE: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

Hi Diane,
Thanks for sending the updated report and the addendum report that attempts to address issues related to the NPNHT and the Bannock Trail. Unfortunately, it would be a lot more honest to call this an archaeological inventory, and state that the author did not find any archaeological resources. He was looking for archaeological evidence of the Trails visible on the ground surface (no subsurface probes were dug), and when he didn’t see any, decided that the trails were not present in the project area and no further cultural resource work was necessary.

The author did not analyze the trails as ethnographic or traditional cultural properties, as should have been done. It is also apparent that the author did not speak to Tribal members about this, citing the 30 year old management plan for information about the Trail.
Archaeologists frequently assert that a lack of archaeological resources results in the absence of significant resources to Tribes. This is untrue, and I request the FAA have a meaningful dialog with the Nez Perce Tribe about the significance of the Nez Perce National Historical Trail before making a final determination of effect.

Thanks, Pat

Patrick Baird
Tribal Archaeologist/ Tribal Historic Preservation Officer
Nez Perce Tribe
Cultural Resource Program
P.O. Box 365
Lapwai, ID 83540
208-621-3851

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Monday, March 23, 2020 2:11 PM
To: Keith P Baird <keithb@nezperce.org>
Cc: Nakia Williamson <nakiaw@nezperce.org>; Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: E-copy of second consultation letter regarding a new terminal at Yellowstone Airport

Pat,

Please see attached for a second letter regarding the construction of a new terminal at WYS. The hard copies and letter were mailed to Chairman Wheeler on Friday, March 20, 2020.

As requested, I’ll also e-mail you copies of the two cultural reports (one focused on the terminal area, and the other an addendum for the routes for water/sewer). Due to file size, I’ll send one report with this e-mail, and send a second e-mail with the second report. Please let me know if you don’t receive both. We’ve been having some network issues and have noted a couple of things falling through the cracks.

Thank you!

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Sent: Friday, August 30, 2019 8:34 AM
To: Keith P Baird <keithb@nezperce.org>
Cc: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Subject: E-copy of initial consultation letter regarding a new terminal at Yellowstone Airport

Good morning Pat,

See attached for a copy of a letter that went out in the mail yesterday to Chairman Wheeler regarding construction of a new terminal at the Yellowstone Airport at West Yellowstone, Montana. Details are included in the letter, but improvements include: construction of a new terminal and associated improvements including (but not limited to):
access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

If you are interested, please note that there is a public informational meeting scheduled for 6 p.m. on Monday, September 16th, at the Yellowstone Airport ARFF Building to review the proposed improvements, process and schedule for the EA, and the environmental impact categories that will be evaluated. A question and answer session will follow a short presentation, and public comments will be received at the meeting.

Thanks, and have a great weekend,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274
March 20, 2020

Mr. Timothy Davis, Chairman
The Blackfeet Nation
All Chiefs Square
PO Box 850
Browning, MT 59417

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Davis:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted you regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

The FAA contacted Tribes with historical ties to this area in order to seek input on properties of cultural or religious significance that may be affected by the undertaking. This contact was done in accordance with Executive Order 13175 and Section 106 of the National Historic Preservation Act of 1966 and implementing regulations 36 CFR Part 800. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail to the project area. The enclosed Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (Addendum), includes consideration of both of these important resources.

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR) for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. No cultural properties were identified in the CRI; however, two historic sites were located within the study area. These historic sites consist of the Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower, both of which are likely to be determined eligible to the National Register of Historic Places (NRHP).

The Addendum to the CRI was conducted in order to examine the routes of the potential extension of water and sewer lines from the Town of West Yellowstone, Montana, to WYS. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum placed both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural resources, nor any sign of the Great Bannock Trail or Nez Perce (Nee-Me-Poo) National Historic Trail.
Both the CRI and the Addendum are enclosed with this letter. The CRI located two historic resources, but no archaeological or cultural sites. The Addendum gave specific consideration to the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail in its examination of the routes of water and sewer lines, but found no sign of either trail, or discovered any archaeological, cultural, or historical sites. Based on the information in the CRI and Addendum, the FAA intends to make a finding of **Historic Properties Adversely Affected** for the proposed project due to unavoidable impacts to the Yellowstone Airport Terminal and Yellowstone Airport Beacon. The FAA has found no evidence of adverse effect to cultural or archaeological sites.

If you would like to open government-to-government consultation for the proposed project or have any comments on the improvements or information that the FAA should consider before contacting the Montana State Historic Preservation Office (SHPO) with a finding of Historic Properties Adversely Affected, please contact Diane Stilson, the Environmental Specialist at our office. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov. Confirmation or comments can also be sent to her at the following address:

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

Thank you in advance for your response.

Sincerely,

William Garrison, Manager
Helena Airports District Office

Enclosures:
- Project Description and Layout
- Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (April 2019)
- Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (March 2020)
- Invitation for Government-to-Government Tribal Consultation dated August 29, 2019

cc: (Via e-mail)
- John Murray, Tribal Historic Preservation Officer, The Blackfeet Nation
- Jason Brey, District Ranger, U.S. Forest Service
- Jeff Kadlec, WYS Airport Manager
- Tim Conway, Administrator, Montana Aeronautics Division
- Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
- HLN ADO
- file
Proposed Improvements at the Yellowstone Airport at West Yellowstone, Montana

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. As a result of implementing new terminal improvements, an ancillary purpose is to improve the water and sewer infrastructure to better serve the new terminal, as well as be extended to facilitate existing and future airport uses and potentially the neighboring USFS Jump Base. Such improvements and modifications must be made to comply with FAA design standards and recommended guidance.

The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking.

Proposed Activity Description

The Proposed Action would construct an approximate 29,000 square foot terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. The following improvements are required to complete the Proposed Action:

- **New Terminal Building**
  - Construct approximate 29,000 SF terminal with space for entry, lobby, seating, screening, passenger hold room, concessions, non-secure and secure area restrooms, airlines and ticketing, baggage dropscreening and handling/lobby, airport administration, Traffic Security Administration (TSA), rental cars, educational kiosks/display areas, mechanical systems and storage area(s), among other airport terminal related uses. The facility will be required to adhere to the State of Montana Architecture & Engineering (A&E) Minimum Design Standards, as well as the High Performance Building Standards.
  - Demolition of Airport Buildings
    - Airport terminal building
    - Generator building

- **Expand Concrete Commercial Parking Pad**

- **Reconstruct and Extend Airport Access Road**
  - Reconstruct the existing access road from HWY 191 to area fronting existing terminal building
  - Extend the airport access road to front new terminal collocate with proposed airport parking

- **Construct New Parking Lot Infrastructure**
  - Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
  - Relocate existing car wash pad facilities for two resident rental car providers

- **New Water Infrastructure Improvements**
  - Extend water main infrastructure from Town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the Airport.
• While USFS Jump Base site-specific water improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accommodate projected needs should the USFS desire to connect. The water main is proposed to be routed to facilitate connection in the immediate vicinity of the Jump Base.

➢ New Sewer Infrastructure Improvements
  • Extend existing gravity sewer main from existing lift station near the Snow Removal Equipment (SRE) building and Fixed Based Operator (FBO) north to a proposed lift station located near the USFS Jump Base adjoining the Airport.
  • Extend a sewer force main from the proposed lift station south to the existing Town of West Yellowstone sewer lagoons, located on the south end of the Airport property.
  • While the USFS Jump Base sewer improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accept such effluent in the future, should the USFS desire to connect.

➢ Replacement of Existing Airport Beacon with New Beacon and Tower
March 20, 2020

Mr. Ernie Stensgar, Chairman
Coeur d’Alene Tribe
PO Box 408
Plummer, ID 83851

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Stensgar:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted you regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

The FAA contacted Tribes with historical ties to this area in order to seek input on properties of cultural or religious significance that may be affected by the undertaking. This contact was done in accordance with Executive Order 13175 and Section 106 of the National Historic Preservation Act of 1966 and implementing regulations 36 CFR Part 800. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail to the project area. The enclosed Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (Addendum), includes consideration of both of these important resources.

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR) for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. No cultural properties were identified in the CRI; however, two historic sites were located within the study area. These historic sites consist of the Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower, both of which are likely to be determined eligible to the National Register of Historic Places (NRHP).

The Addendum to the CRI was conducted in order to examine the routes of the potential extension of water and sewer lines from the Town of West Yellowstone, Montana, to WYS. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural resources, nor any sign of the Great Bannock Trail or Nez Perce (Nee-Me-Poo) National Historic Trail.

Both the CRI and the Addendum are enclosed with this letter. The CRI located two historic resources, but no archaeological or cultural sites. The Addendum gave specific consideration to the Great Bannock Trail
and the Nez Perce (Nee-Me-Poo) National Historic Trail in its examination of the routes of water and sewer lines, but found no sign of either trail, or discovered any archaeological, cultural, or historical sites. Based on the information in the CRI and Addendum, the FAA intends to make a finding of **Historic Properties Adversely Affected** for the proposed project due to unavoidable impacts to the Yellowstone Airport Terminal and Yellowstone Airport Beacon. The FAA has found no evidence of adverse effect to cultural or archaeological sites.

If you would like to open government-to-government consultation for the proposed project or have any comments on the improvements or information that the FAA should consider before contacting the Montana State Historic Preservation Office (SHPO) with a finding of Historic Properties Adversely Affected, please contact Diane Stilson, the Environmental Specialist at our office. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov. Confirmation or comments can also be sent to her at the following address:

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

Thank you in advance for your response.

Sincerely,

[Signature]

William Garrison, Manager
Helena Airports District Office

Enclosures:
- Project Description and Layout
- Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (April 2019)
- Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (March 2020)
- Invitation for Government-to-Government Tribal Consultation dated August 29, 2019

cc: (Via e-mail)
- Jill Wagner, Coeur d’Alene Tribal Historic Preservation Officer
- Jason Brey, District Ranger, U.S. Forest Service
- Jeff Kadlec, WYS Airport Manager
- Tin Conway, Administrator, Montana Aeronautics Division
- Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
- HLN ADO
- file
Proposed Improvements at the Yellowstone Airport at West Yellowstone, Montana

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MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. As a result of implementing new terminal improvements, an ancillary purpose is to improve the water and sewer infrastructure to better serve the new terminal, as well as be extended to facilitate existing and future airport uses and potentially the neighboring USFS Jump Base. Such improvements and modifications must be made to comply with FAA design standards and recommended guidance.

The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking.

Proposed Activity Description

The Proposed Action would construct an approximate 29,000 square foot terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. The following improvements are required to complete the Proposed Action:

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  - Demolition of Airport Buildings
    - Airport terminal building
    - Generator building
- Expand Concrete Commercial Parking Pad
- Reconstruct and Extend Airport Access Road
  - Reconstruct the existing access road from HWY 191 to area fronting existing terminal building
  - Extend the airport access road to front new terminal collocate with proposed airport parking
- Construct New Parking Lot Infrastructure
  - Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
  - Relocate existing car wash pad facilities for two resident rental car providers
- New Water Infrastructure Improvements
  - Extend water main infrastructure from Town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the Airport.
While USFS Jump Base site-specific water improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accommodate projected needs should the USFS desire to connect. The water main is proposed to be routed to facilitate connection in the immediate vicinity of the Jump Base.

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- Replacement of Existing Airport Beacon with New Beacon and Tower
March 20, 2020

Ms. Shelly Fyant, Chairwoman
Confederated Salish and Kootenai Tribes of the Flathead Reservation
42487 Complex Blvd
PO Box 278
Pablo, MT 59855

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairwoman Fyant:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted Chairman Trahan regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

The FAA contacted Tribes with historical ties to this area in order to seek input on properties of cultural or religious significance that may be affected by the undertaking. This contact was done in accordance with Executive Order 13175 and Section 106 of the National Historic Preservation Act of 1966 and implementing regulations 36 CFR Part 800. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail to the project area. The enclosed Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (Addendum), includes consideration of both of these important resources.

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR) for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot. No cultural properties were identified in the CRI; however, two historic sites were located within the study area. These historic sites consist of the Yellowstone Airport Terminal and the Yellowstone Airport Beacon Tower, both of which are likely to be determined eligible to the National Register of Historic Places (NRHP).

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If you would like to open government-to-government consultation for the proposed project or have any comments on the improvements or information that the FAA should consider before contacting the Montana State Historic Preservation Office (SHPO) with a finding of Historic Properties Adversely Affected, please contact Diane Stilson, the Environmental Specialist at our office. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov. Confirmation or comments can also be sent to her at the following address:

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

Thank you in advance for your response.

Sincerely,

William Garrison, Manager
Helena Airports District Office

Enclosures:
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Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (April 2019)
Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (March 2020)
Invitation for Government-to-Government Tribal Consultation dated August 29, 2019

cc: (Via e-mail)
CSKT (Mike Durglo, Jr., Tony Incashola, Kyle Felsman, Sadie Peone)
Jason Brey, District Ranger, U.S. Forest Service
Jeff Kadlec, WYS Airport Manager
Tim Conway, Administrator, Montana Aeronautics Division
Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
HLN ADO
file
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MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. As a result of implementing new terminal improvements, an ancillary purpose is to improve the water and sewer infrastructure to better serve the new terminal, as well as be extended to facilitate existing and future airport uses and potentially the neighboring USFS Jump Base. Such improvements and modifications must be made to comply with FAA design standards and recommended guidance.

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  - Replacement of Existing Airport Beacon with New Beacon and Tower
March 20, 2020

Mr. Gary Aitken Jr., Chairman
Kootenai Tribe of Idaho
PO Box 1269
Bonners Ferry, Idaho 83805

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Aitken:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted you regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

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

Thank you in advance for your response.

Sincerely,

William Garrison, Manager
Helena Airports District Office

Enclosures:

- Project Description and Layout
- Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (April 2019)
- Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (March 2020)
- Invitation for Government-to-Government Tribal Consultation dated August 29, 2019

cc: (Via e-mail)
- Tracy Shottanana, Cultural Department Director
- Jason Brey, District Ranger, U.S. Forest Service
- Jeff Kadlec, WYS Airport Manager
- Tim Conway, Administrator, Montana Aeronautics Division
- Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
- HLN ADO

file
Proposed Improvements at the Yellowstone Airport at West Yellowstone, Montana

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. As a result of implementing new terminal improvements, an ancillary purpose is to improve the water and sewer infrastructure to better serve the new terminal, as well as be extended to facilitate existing and future airport uses and potentially the neighboring USFS Jump Base. Such improvements and modifications must be made to comply with FAA design standards and recommended guidance.

The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking.

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The Proposed Action would construct an approximate 29,000 square foot terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. The following improvements are required to complete the Proposed Action:

- New Terminal Building
  - Construct approximate 29,000 SF terminal with space for entry, lobby, seating, screening, passenger hold room, concessions, non-secure and secure area restrooms, airlines and ticketing, baggage drop/screening and handling/lobby, airport administration, Traffic Security Administration (TSA), rental cars, educational kiosks/display areas, mechanical systems and storage area(s), among other airport terminal related uses. The facility will be required to adhere to the State of Montana Architecture & Engineering (A&E) Minimum Design Standards, as well as the High Performance Building Standards.
  - Demolition of Airport Buildings
    - Airport terminal building
    - Generator building

- Expand Concrete Commercial Parking Pad

- Reconstruct and Extend Airport Access Road
  - Reconstruct the existing access road from HWY 191 to area fronting existing terminal building
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- Construct New Parking Lot Infrastructure
  - Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
  - Relocate existing car wash pad facilities for two resident rental car providers

- New Water Infrastructure Improvements
• Extend water main infrastructure from Town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the Airport.

• While USFS Jump Base site-specific water improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accommodate projected needs should the USFS desire to connect. The water main is proposed to be routed to facilitate connection in the immediate vicinity of the Jump Base.

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• Extend existing gravity sewer main from existing lift station near the Snow Removal Equipment (SRE) building and Fixed Based Operator (FBO) north to a proposed lift station located near the USFS Jump Base adjoining the Airport.

• Extend a sewer force main from the proposed lift station south to the existing Town of West Yellowstone sewer lagoons, located on the south end of the Airport property.

• While the USFS Jump Base sewer improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accept such effluent in the future, should the USFS desire to connect.

➢ Replacement of Existing Airport Beacon with New Beacon and Tower
March 20, 2020

Mr. Shannon Wheeler, Chairman
Nez Perce Tribe
PO Box 305
Lapwai, ID 83540

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed
Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone,
Montana

Dear Chairman Wheeler:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted you regarding the
proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport
(WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with
this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of
West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

The FAA contacted Tribes with historical ties to this area in order to seek input on properties of cultural
or religious significance that may be affected by the undertaking. This contact was done in accordance
with Executive Order 13175 and Section 106 of the National Historic Preservation Act of 1966 and
implementing regulations 36 CFR Part 800. As a result, the FAA was informed of the proximity of the
Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail to the project area. The
enclosed Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area,
Gallatin Co, MT (Addendum), includes consideration of both of these important resources.

The Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (CRI) was
completed in April 2019. The CRI was conducted during the Terminal Area Narrative Report (TANR)
for WYS and focused on identifying historic and cultural properties in the terminal area and parking lot.
No cultural properties were identified in the CRI; however, two historic sites were located within the
study area. These historic sites consist of the Yellowstone Airport Terminal and the Yellowstone Airport
Beacon Tower, both of which are likely to be determined eligible to the National Register of Historic
Places (NRHP).

The Addendum to the CRI was conducted in order to examine the routes of the potential extension of
water and sewer lines from the Town of West Yellowstone, Montana, to WYS. It was completed in
March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the Nez
Perce (Nee-Me-Poo) National Historic Trail. The Addendum revealed that the exact routes of the trails
are very elusive to determine; however, all research reviewed for the Addendum places both trails to the
north of the project area. The field survey conducted for the Addendum uncovered no cultural resources,
nor any sign of the Great Bannock Trail or Nez Perce (Nee-Me-Poo) National Historic Trail.

Both the CRI and the Addendum are enclosed with this letter. The CRI located two historic resources, but
no archaeological or cultural sites. The Addendum gave specific consideration to the Great Bannock Trail
and the Nez Perce (Nee-Me-Poo) National Historic Trail in its examination of the routes of water and sewer lines, but found no sign of either trail, or discovered any archaeological, cultural, or historical sites. Based on the information in the CRI and Addendum, the FAA intends to make a finding of **Historic Properties Adversely Affected** for the proposed project due to unavoidable impacts to the Yellowstone Airport Terminal and Yellowstone Airport Beacon. The FAA has found no evidence of adverse effect to cultural or archaeological sites.

If you would like to open government-to-government consultation for the proposed project or have any comments on the improvements or information that the FAA should consider before contacting the Montana State Historic Preservation Office (SHPO) with a finding of Historic Properties Adversely Affected, please contact Diane Stilson, the Environmental Specialist at our office. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov. Confirmation or comments can also be sent to her at the following address:

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

Thank you in advance for your response.

Sincerely,

[Signature]

William Garrison, Manager
Helena Airports District Office

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cc: (Via e-mail)
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➢ Replacement of Existing Airport Beacon with New Beacon and Tower
March 20, 2020

Mr. Ladd Edmo, Chairman
Shoshone Bannock Tribes
PO Box 306
Fort Hall, ID 83203

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Edmo:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted you regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

The FAA contacted Tribes with historical ties to this area in order to seek input on properties of cultural or religious significance that may be affected by the undertaking. This contact was done in accordance with Executive Order 13175 and Section 106 of the National Historic Preservation Act of 1966 and implementing regulations 36 CFR Part 800. As a result, the FAA was informed of the proximity of the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail to the project area. The enclosed Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT (Addendum), includes consideration of both of these important resources.

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FAA Helena Airport District Office  
2725 Skyway Drive, Suite 2  
Helena, Montana 59602-1213

Thank you in advance for your response.

Sincerely,

[Signature]

William Garrison, Manager  
Helena Airports District Office

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cc: (Via e-mail)  
Louise E. Dixey, Cultural Resources Director  
Carolyn Smith, Cultural Resources Coordinator  
Jason Brey, District Ranger, U.S. Forest Service  
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➢ Replacement of Existing Airport Beacon with New Beacon and Tower
March 20, 2020

Mr. Delano Saluskin, Chairman of the Tribal Council
Confederated Tribes and Bands of the Yakama Nation
PO BOX 151
Toppenish, WA 98948

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Saluskin:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted Chairman Goudy regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

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➢ Replacement of Existing Airport Beacon with New Beacon and Tower
March 20, 2020

Ms. Kat Brigham, Chairman of the Board of Trustees
Confederated Tribes of the Umatilla Indian Reservation
Nixyaawii Governance Center
46411 Timine Way
Pendleton, OR 97801

Subject: Second Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Brigham:

In a letter dated August 29, 2019, the Federal Aviation Administration (FAA) contacted Chairman Burke regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. An updated project description and layout are enclosed with this letter. A proposed route has been chosen for the routes of the water and sewer lines from the Town of West Yellowstone to WYS, with minor revisions from the original layouts sent in August 2019.

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The Addendum to the CRI was conducted in order to examine the routes of the potential extension of water and sewer lines from the Town of West Yellowstone, Montana, to WYS. It was completed in March 2020. Specific consideration was given to any impact on the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail. The Addendum revealed that the exact routes of the trails are very elusive to determine; however, all research reviewed for the Addendum places both trails to the north of the project area. The field survey conducted for the Addendum uncovered no cultural resources, nor any sign of the Great Bannock Trail or Nez Perce (Nee-Me-Poo) National Historic Trail.
Both the CRI and the Addendum are enclosed with this letter. The CRI located two historic resources, but no archaeological or cultural sites. The Addendum gave specific consideration to the Great Bannock Trail and the Nez Perce (Nee-Me-Poo) National Historic Trail in its examination of the routes of water and sewer lines, but found no sign of either trail, or discovered any archaeological, cultural, or historical sites. Based on the information in the CRI and Addendum, the FAA intends to make a finding of Historic Properties Adversely Affected for the proposed project due to unavoidable impacts to the Yellowstone Airport Terminal and Yellowstone Airport Beacon. The FAA has found no evidence of adverse effect to cultural or archaeological sites.

If you would like to open government-to-government consultation for the proposed project or have any comments on the improvements or information that the FAA should consider before contacting the Montana State Historic Preservation Office (SHPO) with a finding of Historic Properties Adversely Affected, please contact Diane Stilson, the Environmental Specialist at our office. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov. Confirmation or comments can also be sent to her at the following address:

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

Thank you in advance for your response.

Sincerely,

[Signature]

William Garrison, Manager
Helena Airports District Office

Enclosures:
  Project Description and Layout
  Cultural Resource Inventory of the Yellowstone Airport Terminal Area, Gallatin Co, MT
  (April 2019)
  Addendum to the Cultural Resource Inventory of the Yellowstone Airport Terminal
  Area, Gallatin Co, MT (March 2020)
  Invitation for Government-to-Government Tribal Consultation dated August 29, 2019

cc: (Via e-mail)
  Carey Miller, Tribal Historic Preservation Officer/Senior Archaeologist
  Jason Brey, District Ranger, U.S. Forest Service
  Jeff Kadlec, WYS Airport Manager
  Tim Conway, Administrator, Montana Aeronautics Division
  Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
  HLN ADO
  file
Proposed Improvements at the Yellowstone Airport at West Yellowstone, Montana

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. As a result of implementing new terminal improvements, an ancillary purpose is to improve the water and sewer infrastructure to better serve the new terminal, as well as be extended to facilitate existing and future airport uses and potentially the neighboring USFS Jump Base. Such improvements and modifications must be made to comply with FAA design standards and recommended guidance.

The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking.

Proposed Activity Description

The Proposed Action would construct an approximate 29,000 square foot terminal with ancillary improvements to provide an updated and safe terminal building and associated improvements to meet existing and future passenger and terminal user needs based on FAA recommendations for such a facility. The following improvements are required to complete the Proposed Action:

- **New Terminal Building**
  - Construct approximate 29,000 SF terminal with space for entry, lobby, seating, screening, passenger hold room, concessions, non-secure and secure area restrooms, airlines and ticketing, baggage drop/screening and handling/lobby, airport administration, Traffic Security Administration (TSA), rental cars, educational kiosks/display areas, mechanical systems and storage area(s), among other airport terminal related uses. The facility will be required to adhere to the State of Montana Architecture & Engineering (A&E) Minimum Design Standards, as well as the High Performance Building Standards.
  - Demolition of Airport Buildings
    - Airport terminal building
    - Generator building
- **Expand Concrete Commercial Parking Pad**
- **Reconstruct and Extend Airport Access Road**
  - Reconstruct the existing access road from HWY 191 to area fronting existing terminal building
  - Extend the airport access road to front new terminal collocate with proposed airport parking
- **Construct New Parking Lot Infrastructure**
  - Construct parking lot for passengers, rental cars, and administrative staff (airport/airline/TSA/concessions/etc.)
  - Relocate existing car wash pad facilities for two resident rental car providers
- **New Water Infrastructure Improvements**
  - Extend water main infrastructure from Town of West Yellowstone, approximately 27,815 linear feet (LF) to serve the new terminal, terminal area structures, and USFS Jump Base adjoining the Airport.
• While USFS Jump Base site-specific water improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accommodate projected needs should the USFS desire to connect. The water main is proposed to be routed to facilitate connection in the immediate vicinity of the Jump Base.

➢ New Sewer Infrastructure Improvements

• Extend existing gravity sewer main from existing lift station near the Snow Removal Equipment (SRE) building and Fixed Based Operator (FBO) north to a proposed lift station located near the USFS Jump Base adjoining the Airport.

• Extend a sewer force main from the proposed lift station south to the existing Town of West Yellowstone sewer lagoons, located on the south end of the Airport property.

• While the USFS Jump Base sewer improvements are not proposed as part of the project eligible for FAA funding assistance, the system is proposed to be sized to accept such effluent in the future, should the USFS desire to connect.

➢ Replacement of Existing Airport Beacon with New Beacon and Tower
September 30, 2019

Regulatory Branch
Montana State Program
Corps No. NWO-2019-01562-MTH

Subject: Montana Department of Transportation - Aeronautic Division (Morrison Maierle) Yellowstone Airport - Unnamed Waterway (Gallatin County)

Travis Eickman
Morrison-Maierle
2880 Technology Blvd W
Bozeman, Montana 59718

Dear Mr. Eickman:

We are responding to your request for Department of the Army (DA) comment regarding the above-referenced project. Specifically, you are proposing construction for terminal improvements and the extension of the Town of West Yellowstone municipal water and sanitary sewer services to accommodate the airport buildings. The project is located at Latitude 44.686763°, Longitude, within Section 21, Township 13 S, Range 5E, Meridian, Gallatin County, Montana.

The mission of the U.S. Army Corps of Engineers (Corps) Regulatory Program is to protect the Nation’s aquatic resources while allowing reasonable development through fair, flexible and balanced permit decisions. In particular, under Section 404 of the Clean Water Act, we work to protect the biological, physical, and chemical integrity of the Nation’s aquatic resources. Projects are evaluated on a case-by-case basis to determine the potential benefits and detriments that may occur as a result of the proposal. In all cases an applicant must avoid and minimize impacts to aquatic resources to the greatest extent practicable.

Under the authority of Section 404 of the Clean Water Act (CWA), DA permits are required for the discharge of fill material into waters of the U.S. Waters of the U.S. include the area below the ordinary high water mark of stream channels and lakes or ponds connected to the tributary system, and wetlands adjacent to these waters. Isolated waters and wetlands, as well as man-made channels, may be waters of the U.S. in certain circumstances, which must be determined on a case-by-case basis.

Based on the information provided in your submittal, we are unable to ascertain if regulated activities are proposed or if jurisdictional waters of the U.S. are present within the project area. If your final design includes the placement of fill material in any jurisdictional area described above, or otherwise requires authorization by a DA permit,
please submit a Montana Joint Permit Application to this office prior to starting any work. After a review of the materials submitted we will determine what type of permit, if any, will be required. You can obtain a Montana Joint Permit Application Form at the following address: http://www.dnrc.mt.gov/licenses-and-permits/stream-permitting. If you do not have internet access please contact our office at the address below to obtain more information.

Note that this letter is not a DA authorization to proceed. It only informs you of your need to obtain a DA permit if waters of the U.S. will be affected. If waters of the U.S. will not be affected by a jurisdictional activity a DA permit will not be required for the project.

Please refer to identification number NWO-2019-01562-MTH in any correspondence concerning this project. If you have any questions, please contact Jade Clabaugh at 10 W 15th Street, Suite 2200, Helena, MT, 59626, by email at Jade.M.Clabaugh@usace.army.mil, or telephone at (406) 441-1365.

Sincerely,

CLABAUGH.JADE.M
ETZLER.1535431252

Jade M. Clabaugh
Regulatory Project Manager
September 12, 2019

Travis Eickman
Morrison-Maierle
2880 Technology Blvd
Bozeman MT 59718

RE: WEST YELLOWSTONE AIRPORT TERMINAL CONSTRUCTION AND IMPROVEMENTS. SHPO Project #: 2019091008

Dear Mr. Eickman:

I have conducted a cultural resource file search for the above-cited project located in Section 21, T13S R5E. According to our records there have been a few previously recorded sites within the designated search locale. The absence of more cultural properties in the area does not mean that they do not exist but rather may reflect the absence of any previous cultural resource inventory in the area, as our records indicated none.

It is SHPO’s position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. Both the existing airport terminal and associated buildings (24GA1958) and airway beacon (24GA1981) have been previously recorded as historic properties. If any of these structures are to be altered, we would recommend that a formal determination of their eligibility be made prior to any disturbance taking place. We would ask that you contact Jon Axline at the MDT for any concerns that he may have regarding this proposed project.

If you have any further questions or comments, you may contact me at (406) 444-7767 or by e-mail at dmurdo@mt.gov. I have attached an invoice for the file search. Thank you for consulting with us.

Sincerely,

Damon Murdo
Cultural Records Manager
State Historic Preservation Office
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<td>Historic Period</td>
<td>State Owned</td>
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</tbody>
</table>
Travis,

I received one response from the Nez Perce already and a head’s up about a resource that we’ll want to investigate. See below for his comment and my response.

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

Pat,

Shoot, and I thought I’d double and triple-checked those letters. I used a template from the deed restrictions and didn’t catch that edit. The subject line should have been: Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

We’ll make sure to include a discussion of the Nez Perce National Historical Trial and any impact/relevance that this project may have to the Trail. I will certainly let you know about the relation of this project to the trail and involve you if you think appropriate. Thanks for the heads up on this important resource!

Have a great weekend,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274
Hi Diane,

I’m confused about the subject line on the letter – is the FAA asking the tribe to consult about the release of a deed restriction, or are we talking about the proposed new terminal?

The airport (and the town of West Yellowstone) sit atop the Nez Perce National Historical Trail, which commemorates the US Army’s pursuit of Nez Perces during the summer of 1877. These events, and the Trail, are huge ly significant to the Nez Perce Tribe, and I expect that the FAA’s analysis of this proposal addresses the significance of the site to the Tribe.

Thanks, Pat

Patrick Baird
Tribal Historic Preservation Officer
Nez Perce Tribe
P.O. Box 365
Lapwai, ID 83540
(208) 621-3851 office
(208) 791-8610 cell

Good morning Pat,

See attached for a copy of a letter that went out in the mail yesterday to Chairman Wheeler regarding construction of a new terminal at the Yellowstone Airport at West Yellowstone, Montana. Details are included in the letter, but improvements include: construction of a new terminal and associated improvements including (but not limited to): access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

If you are interested, please note that there is a public informational meeting scheduled for 6 p.m. on Monday, September 16th, at the Yellowstone Airport ARFF Building to review the proposed improvements, process and schedule for the EA, and the environmental impact categories that will be evaluated. A question and answer session will follow a short presentation, and public comments will be received at the meeting.
Thanks, and have a great weekend,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274
Travis, Jeff,

See below for the response from the Shoshone Bannock Tribes. From my past experience with these Tribes, if they have an interest in an area, they will request a staff-to-staff meeting, and then determine if it needs to proceed to full government to government consultation. The request below is for this first step, and would be at Fort Hall.

I know I will be booked solid essentially through the end of the month. We’ll probably want to try and coordinate some dates in early October would be my recommendation.

Thanks,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

Diane,

We would request consultation, at a minimum a staff to staff meeting where you can present the proposed improvements to the Yellowstone Airport, please provide some proposed dates that you can meet with use and discuss the improvements.

Thanks you for your early response.

Louise E. Dixey
Cultural Resources Director
PO Box 306, Fort Hall, ID 83203
Ph: 208-236-1185
Email: ledixey@sbtribes.com
From: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>  
Sent: Friday, August 30, 2019 8:36 AM  
To: Louise E. Dixey <ledixey@sbtribes.com>  
Cc: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>  
Subject: E-copy of initial consultation letter regarding a new terminal at Yellowstone Airport

Good morning Louise,

See attached for a copy of a letter that went out in the mail yesterday to Chairman Edmo regarding construction of a new terminal at the Yellowstone Airport at West Yellowstone, Montana. Details are included in the letter, but improvements include: construction of a new terminal and associated improvements including (but not limited to): access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

If you are interested, please note that there is a public informational meeting scheduled for 6 p.m. on Monday, September 16th, at the Yellowstone Airport ARFF Building to review the proposed improvements, process and schedule for the EA, and the environmental impact categories that will be evaluated. A question and answer session will follow a short presentation, and public comments will be received at the meeting.

Thanks, and have a great weekend,

Diane Stilson, P.E.  
Civil Engineer  
Environmental Protection Specialist  
FAA, Helena Airports District Office  
2725 Skyway Drive, Suite 2  
Helena, MT 59602  
Ph: (406) 441-5411  
Fax: (406) 449-5274
FYI... from the CSKT

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274

From: Thompson Smith <Thompson.Smith@cskt.org>
Sent: Friday, August 30, 2019 12:43 PM
To: Stilson, Diane (FAA) <Diane.Stilson@faa.gov>
Cc: Tony Incashola Sr <TonyI@cskt.org>; Kyle Felsman <Kyle.Felsman@cskt.org>
Subject: Re: E-copy of initial consultation letter regarding a new terminal at Yellowstone Airport

Thank you Diane. I am cc:ing the Culture Committee Director, Tony Incashola, and Kyle Felsman, the Tribal Historic Preservation Officer. Kyle works under the CSKT Preservation Department, which oversees site protection and which arranged the mitigation agreement for the Stevensville airport.

best,
Thompson

wrote:

Thompson,

An error was pointed out to me in the letter I’d sent earlier this morning, and I apologize for the mistake. I’d used a template from an earlier letter I’d sent to your Tribe and neglected to change the subject line. It should read:

Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Sorry! Have a great weekend,

Diane Stilson, P.E.
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
Good morning Thompson,

See attached for a copy of a letter that went out in the mail yesterday to Chairman Trahan regarding construction of a new terminal at the Yellowstone Airport at West Yellowstone, Montana. Details are included in the letter, but improvements include: construction of a new terminal and associated improvements including (but not limited to): access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

If you are interested, please note that there is a public informational meeting scheduled for 6 p.m. on Monday, September 16th, at the Yellowstone Airport ARFF Building to review the proposed improvements, process and schedule for the EA, and the environmental impact categories that will be evaluated. A question and answer session will follow a short presentation, and public comments will be received at the meeting.

Thanks, and have a great weekend,

**Diane Stilson, P.E.**
Civil Engineer
Environmental Protection Specialist
FAA, Helena Airports District Office
2725 Skyway Drive, Suite 2
Helena, MT 59602
Ph: (406) 441-5411
Fax: (406) 449-5274
In Reply Refer To:
File: M.29 Public
TAILS: 06E11000-2019-TA-0768;
06E11000-2019-CPA-0077

September 26, 2019

Travis Eickman, P.E.
Morrison-Maierle, Inc.
2880 Technology Blvd. West
Bozeman, MT  59718

Dear Mr. Eickman:

Thank you for your letter of August 29, 2019 requesting U.S. Fish and Wildlife Service (Service) comment regarding proposed improvements to the terminal area of the Yellowstone Airport located at 721 Airport Road in West Yellowstone, Gallatin County, Montana and the associated preparation of an Environmental Assessment (EA). The project proposes to replace the existing 12,000 square foot terminal with a new terminal facility encompassing approximately 29,000 square feet. Ancillary improvements proposed included access road and parking, new airport beacon, apron improvements, and water and sewer improvements. Additionally, the Town of West Yellowstone municipal water and sewer services would be extended to accommodate the airport buildings, which are currently serviced by a well and septic system. Our comments are prepared under the authority of, and in accordance with, the provisions of the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.), Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, 54 Stat. 250), and the Endangered Species Act (16 U.S.C. 1531 et. seq.).

Threatened and Endangered Species

Listed and proposed and candidate threatened and endangered species that may be present in Gallatin County include the listed threatened Canada lynx, grizzly bear, and Ute ladies’-tresses; proposed wolverine; and candidate whitebark pine. No designated or proposed critical habitat occurs in the project area. The Canada lynx and wolverine may occur as rare transients in the general project area. We are not aware of documented Ute ladies’-tresses occurrences in the project vicinity, and no suitable habitat exists within several miles of the proposed project location. Whitebark pine habitat does not occur in the immediate project vicinity.

Grizzly bears may occasionally occur in the general project area, and to reduce the risk of human-grizzly bear conflicts related to this project, the Service advises implementation of the following (or similar) voluntary conservation measures as appropriate:

1. Promptly clean up any project related spills, litter, garbage, debris, etc.
2. Allow no overnight camping within the project vicinity, except in designated campgrounds, by any crew member or other personnel associated with this project.
3. Store all food, food related items, petroleum products, antifreeze, garbage, personal hygiene items, and other attractants inside a closed, hard-sided vehicle or commercially manufactured...
bear resistant container.
4. Remove garbage from the project site daily and dispose of it in accordance with all applicable regulations.
5. Notify the Project Manager of any animal carcasses found in the area.
6. Notify the Project Manager of any grizzly bears observed in the vicinity of the project.

**Bald and Golden Eagle Protection Act**
The Service is not aware of active eagle nests within several miles of the proposed project site. We provide the following for your information, as currently unknown nests could occur in the project vicinity where suitable habitat exists, and nest surveys have not been conducted.

The bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*) are protected from a variety of harmful actions via take prohibitions in both the Migratory Bird Treaty Act\(^1\) (MBTA; 16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (BGEPA; 16 U.S.C. 668–668d). The BGEPA, enacted in 1940 and amended several times, prohibits take of bald eagles and golden eagles, including their parts, nests, young or eggs, except where otherwise permitted pursuant to federal regulations. Incidental take of eagles from actions such as electrocutions from power lines or wind turbine strikes are prohibited unless specifically authorized via an eagle incidental take permit from U.S. Fish and Wildlife Service (Service). BGEPA provides penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof."

BGEPA defines take to include the following actions: "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." The Service expanded this definition by regulation to include the term “destroy” to ensure that “take” also encompasses destruction of eagle nests. Also the Service defined the term disturb, which means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

The Service has developed guidance for the public regarding means to avoid take of bald and golden eagles:

- The 2007 *National Bald Eagle Management Guidelines* serve to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of BGEPA may apply. They provide conservation recommendations to help people avoid and/or minimize such impacts to bald eagles, particularly where they may constitute “disturbance,” which is prohibited by the BGEPA.

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\(^{1}\) On December 22, 2017, the Department of the Interior’s (DOI) Office of the Solicitor Memorandum M-37050 titled The Migratory Bird Treaty Act Does Not Prohibit Incidental Take [https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf) concludes that the MBTA’s prohibitions on pursuing, hunting, taking, capturing, killing, or attempting to do the same apply only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs. The MBTA list of protected species includes bald and golden eagles, and the law has been an effective tool to pursue incidental take cases involving eagles. However, the primary law protecting eagles is the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S. Code § 668), since the bald eagle was delisted under the Endangered Species Act in 2007. Memorandum-37050 does not affect the ability of the Service to refer entities for prosecution that have violated the take prohibitions for eagles established by the BGEPA.

**Migratory Bird Treaty Act**

We have reviewed the provided information and determined that there could be potential effects to migratory birds. To the extent practicable, necessary vegetation clearing, grubbing, and filling construction activities should be scheduled so as to avoid and minimize impacts to nesting birds, if present in the project area(s). Active nests may not be purposefully removed. The Service has developed, and continues to revise and develop, general and industry-specific conservation measures for avoiding and minimizing impacts to birds (https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php). We recommend that the proposed project considers and incorporates these measures into project design, construction, and documentation as appropriate.

**Additional Guidance**

If wetlands will be affected by the project, the Service recommends keeping wetland disturbances to the minimum extent and duration possible, with as much occurring “in the dry” as possible. This would reduce impacts to aquatic species relative to disturbance and sediment inputs. We also again recommend that appropriate erosion and sediment control efforts and measures be implemented during and following construction to avoid introducing sediments or other contaminants to adjacent waters.

In addition to coordination with the Service, we recommend coordination with Montana Fish, Wildlife and Parks and the Montana Natural Heritage Program. These agencies may be able to provide updated, site-specific information regarding fish, wildlife, and sensitive plant resources occurring in the proposed project area. Contact information for these two agencies is below:

**Montana Fish, Wildlife and Parks**
1420 East Sixth Avenue
P.O. Box 200701
Helena, Montana 59620-0701
Phone: (406) 444-2535

**Montana Natural Heritage Program**
1515 East 6th Avenue, Box 201800
Helena, Montana 59620-1800
Phone: (406) 444-5354

Thank you for the opportunity to comment on the proposed project. If you have further questions related to this correspondence, please do not hesitate to contact Karen Newlon at (406) 449-5225, extension 209 or karen_newlon@fws.gov.

Sincerely,

Jodi L. Bush
Office Supervisor
United States Department of the Interior

NATIONAL PARK SERVICE
PO Box 168
Yellowstone National Park
Wyoming 82190

SEP 26 2019

Mr. Travis Eickman, P.E.
Morrison-Maierle, Inc.
2880 Technology Boulevard West
Bozeman, Montana 59718

Dear Mr. Eickman:

Thank you for the opportunity to comment on the project outlined in the scoping letter titled Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana, which proposes construction of a new 29,000 square-foot airline terminal to replace the existing 12,000 square-foot terminal at the West Yellowstone Airport. The current design includes a new terminal as well as supporting facilities such as restrooms, customer amenities, an access road, parking for employees, public, and rental cars (473 spaces). Also included are water and sanitary sewer improvements.

The project is very close to Yellowstone National Park’s western boundary at approximately 0.20 of a mile, and directly north of the town of West Yellowstone, Montana. This project will likely increase flights to and from the airport facility. An increase in airline traffic may affect the park’s natural soundscapes, though at this point in the design, we have not identified any direct impacts to park resources. We would like to continue to be involved in the planning process as it moves forward.

Thank you for the opportunity to provide input on the proposal.

Sincerely,

[Signature]

Cameron H. Sholly
Superintendent
August 29, 2019

West Yellowstone Chamber of Commerce
P.O. Box 458
West Yellowstone, MT 59758

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

To Whom It May Concern:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

Proposed Activity Description
The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

The existing terminal would be demolished, along with the generator building, upon completion and startup of the new facility. The existing beacon and tower would either remain in their existing location, or be relocated depending on the final terminal layout.

Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles.

We create solutions that build better communities.
Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any West Yellowstone Chamber of Commerce resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

Should no comments be received within that time period, we will take that as there being no comment at this time. Your agency will be advised again at the time that the draft EA is advertised for a 30-day public comment period. Please send your written response to the following address:

Morrison-Maierle, Inc.
Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718
teckman@m-m.net

In addition to this opportunity to provide written comment, the MDT – Aeronautics Division would like to invite your agency to an informational meeting at 6 p.m. on Monday, September 16th, at the Yellowstone Airport Aircraft Rescue Fire Fighting (ARFF) Building at 629 Yellowstone Airport Road. The meeting will review the proposed improvements, process and schedule for the EA, as well as the environmental impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

Town of West Yellowstone  
Attn: Brad Schmier, Mayor and Town Council  
P.O. Box 1570  
West Yellowstone, MT  59758

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mayor Schmier and Town Council Members:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

Proposed Activity Description
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**Information Request**

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Town of West Yellowstone
Attn: Dan Sabolsky, Town Manager
P.O. Box 1570
West Yellowstone, MT 59758

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Sabolsky:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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This correspondence has also been sent to other Town of West Yellowstone departments as noted below. Should any other staff or departments be deemed appropriate to advise, please forward this information or advise us of those contacts and we can submit additional copies to them directly.

- Mayor and Town Council
- Public Works Department
- Parks & Recreation
- Police Department
If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer

Enclosures
August 29, 2019

Town of West Yellowstone Public Works Department
Attn: James Patterson, Superintendent of Public Services
P.O. Box 1570
West Yellowstone, MT 59758

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Patterson:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
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Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Town of West Yellowstone Parks & Recreation
Attn: Irma Vazquez, Recreation Coordinator
P.O. Box 1570
West Yellowstone, MT 59758

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements, West Yellowstone, Montana

Dear Ms. Vazquez:

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Town of West Yellowstone Police Department
Attn: Scott Newell, Chief of Police
P.O. Box 1570
West Yellowstone, MT 59758

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Chief Newell:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Sincerely,

Morrison-Maierle, Inc.

[Signature]
Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Hebgen Basin Fire District  
Attn: Shane Grube, Fire Chief  
10 South Faithful Street  
West Yellowstone, MT 59758

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Chief Grube:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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**Information Request**
Please provide any comments concerning potential impacts from the proposed project on any Hebgen Basin Fire District resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.  
Senior Airport Engineer
August 29, 2019

Gallatin County Commission
311 West Main, Room 306
Bozeman, MT 59715

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Commissioners:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

Proposed Activity Description
The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

The existing terminal would be demolished, along with the generator building, upon completion and startup of the new facility. The existing beacon and tower would either remain in their existing location, or be relocated depending on the final terminal layout.

Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles.
Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

**Information Request**

Please provide any comments concerning potential impacts from the proposed project on any Gallatin County resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

Should no comments be received within that time period, we will take that as there being no comment at this time. Your agency will be advised again at the time that the draft EA is advertised for a 30-day public comment period. Please send your written response to the following address:

Morrison-Maierle, Inc.
Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718
[teickman@m-m.net](mailto:teickman@m-m.net)

In addition to this opportunity to provide written comment, the MDT – Aeronautics Division would like to invite your agency to an informational meeting at 6 p.m. on Monday, September 16th, at the Yellowstone Airport Aircraft Rescue Fire Fighting (ARFF) Building at 629 Yellowstone Airport Road. The meeting will review the proposed improvements, process and schedule for the EA, as well as the environmental impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

[Signature]
Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

Gallatin County Conservation and Parks
Attn: Michael Harris
311 West Main, Room 304
Bozeman, MT 59715

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Harris:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with known water quality and quantity issues, and would provide improved water pressure for fire.
suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles. Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any Gallatin County Conservation and Parks resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Morrison-Maierle, Inc.
Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718

teickman@m-m.net

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-8810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Gallatin County Planning Department
Attn: Sean O’Callaghan, Planning Director
311 West Main, Room 108
Bozeman, MT 59715

RE: Yellowstone Airport — Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. O’Callaghan:

The Montana Department of Transportation (MDT) — Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Extending the Town of West Yellowstone's sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any Gallatin County Planning Department resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Attn: Travis Eickman, P.E.
2680 Technology Blvd. West
Bozeman, Montana 59718
teckman@m-m.net

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Gallatin County Road & Bridge Department
205 Baxter Lane West
Bozeman, MT 59718

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

To Whom It May Concern:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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We create solutions that build better communities.

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Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

Gallatin County Sheriff
Attn: Sheriff Gootkin
615 S. 16th Avenue, Room 22
Bozeman, MT 59715

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Sheriff Gootkin:

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Information Request
Please provide any comments concerning potential impacts from the proposed project on any Gallatin County Sheriff resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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2880 Technology Blvd, West
Bozeman, Montana 59718

teickman@m-m.net

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Sincerely,

Morrison-Maierle, Inc.

[Signature]

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

United States Department of Agriculture – Custer Gallatin National Forest
Supervisors Office
Attn: Mary Erickson, Forest Supervisor
P.O. Box 130
Bozeman, MT 59771

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Ms. Erickson:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles. Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any Custer Gallatin National Forest resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Morrison-Maierle, Inc.
Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718
teickman@m-m.net

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

United States Department of Agriculture – Custer Gallatin National Forest
Hebgen Lake Ranger District
Attn: Jason Brey, District Ranger
330 Gallatin Road
West Yellowstone, MT 59758-0520

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Brey:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any Hebgen Lake Ranger District resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Department of Natural Resources and Conservation
1625 11th Avenue
Helena, MT 59620

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

To Whom It May Concern:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

Proposed Activity Description
The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

The existing terminal would be demolished, along with the generator building, upon completion and startup of the new facility. The existing beacon and tower would either remain in their existing location, or be relocated depending on the final terminal layout.

Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles.

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Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

**Information Request**

Please provide any comments concerning potential impacts from the proposed project on any DNRC resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

Should no comments be received within that time period, we will take that as there being no comment at this time. Your agency will be advised again at the time that the draft EA is advertised for a 30-day public comment period. Please send your written response to the following address:

Morrison-Maierle, Inc.
Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718

[teickman@m-m.net](mailto:teickman@m-m.net)

In addition to this opportunity to provide written comment, the MDT – Aeronautics Division would like to invite your agency to an informational meeting at 6 p.m. on Monday, September 16th, at the Yellowstone Airport Aircraft Rescue Fire Fighting (ARFF) Building at 629 Yellowstone Airport Road. The meeting will review the proposed improvements, process and schedule for the EA, as well as the environmental impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

[Travis Eickman, P.E.](mailto:TravisEickman@m-m.net)
Senior Airport Engineer

Enclosures
August 29, 2019

Montana Department of Environmental Quality
Attn: Shaun McGrath
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. McGrath:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any Montana DEQ resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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2880 Technology Blvd. West
Bozeman, Montana 59718

teickman@m-m.net

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Montana Department of Fish, Wildlife, and Parks
Region 3 Headquarters
Attn: Julie Cunningham, Wildlife Biologist
1400 South 19th Avenue
Bozeman, MT 59718

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Ms. Cunningham:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any Montana Fish, Wildlife, and Parks resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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2880 Technology Blvd. West
Bozeman, Montana 59718

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
September 6, 2019

Montana Historical Society
State Historic Preservation Office
Attn: Damon Murdo, Cultural Records Manager
P.O. Box 201201
Helena, MT 59620-1201

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Murdo:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

**Information Request**

Please provide any comments concerning potential impacts from the proposed project on any State Historic Preservation Office resources or areas of concern within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (October 5, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer

Enclosures
September 26, 2019

Montana Natural Heritage Program
1515 East 6th Avenue
Helena, MT 59620-1800

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

To Whom It May Concern:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Bozeman, Montana 59718
	teickman@m-m.net

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

Natural Resources Conservation Service
Attn: Kale Gullet, State Resource Conservationist
10 East Babcock, Room 443
Bozeman, MT 59715

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Gullet:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Information Request
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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer

Enclosures
August 29, 2019

U.S. Army Corps of Engineers
Montana Regulatory Office
Attn: Todd Tillinger, State Program Manager
10 West 15th Street, Suite 2200
Helena, MT 59626

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Tillinger:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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Information Request
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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

[Signature]
Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

U.S. Department of Interior – Bureau of Land Management
Montana/Dakotas State Office
Attn: John Mehlhoff, State Director
5001 Southgate Drive
Billings, MT 59101

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Mehlhoff:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

Proposed Activity Description
The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

The existing terminal would be demolished, along with the generator building, upon completion and startup of the new facility. The existing beacon and tower would either remain in their existing location, or be relocated depending on the final terminal layout.

Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with
known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles. Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

**Information Request**

Please provide any comments concerning potential impacts from the proposed project on any BLM resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

Should no comments be received within that time period, we will take that as there being no comment at this time. Your agency will be advised again at the time that the draft EA is advertised for a 30-day public comment period. Please send your written response to the following address:

Morrison-Maierle, Inc.
Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718

teickman@m-m.net

In addition to this opportunity to provide written comment, the MDT – Aeronautics Division would like to invite your agency to an informational meeting at 6 p.m. on Monday, September 16th, at the Yellowstone Airport Aircraft Rescue Fire Fighting (ARFF) Building at 629 Yellowstone Airport Road. The meeting will review the proposed improvements, process and schedule for the EA, as well as the environmental impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

U.S. Fish and Wildlife Service  
Montana Ecological Services Field Office  
Attn: Jodi Bush, Field Supervisor  
585 Shepard Way  
Helena, MT 59601

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Ms. Bush:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

**Proposed Activity Description**

The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

The existing terminal would be demolished, along with the generator building, upon completion and startup of the new facility. The existing beacon and tower would either remain in their existing location, or be relocated depending on the final terminal layout.

Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with
known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles. Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

**Information Request**
Please provide any comments concerning potential impacts from the proposed project on any U.S. Fish and Wildlife Service resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Morrison-Maierle, Inc.
Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718

teckman@m-m.net

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-8810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
August 29, 2019

Yellowstone National Park
Attn: Cameron Sholly, Superintendent
P.O. Box 168
Yellowstone National Park, WY 82190

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Sholly:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

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Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with known water quality and quantity issues, and would provide improved water pressure for fire
suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles. Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Information Request
Please provide any comments concerning potential impacts from the proposed project on any Yellowstone National Park resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718

teickman@m-m.net

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

Montana Department of Transportation – Aeronautics Division  
Attn: Tim Conway, Administrator  
P.O. Box 200507  
Helena, MT  59620

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Mr. Conway:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking. MMI is initializing coordination with various agencies that may have affected areas of interest in order to provide them with the opportunity to include their comments or concerns while the EA is being prepared.

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Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with known water quality and quantity issues, and would provide improved water pressure for fire
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Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

**Information Request**

Please provide any comments concerning potential impacts from the proposed project on any MDT – Aeronautics Division resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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2880 Technology Blvd. West
Bozeman, Montana 59718

teickman@m-m.net

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Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

Federal Aviation Administration, Helena ADO
Attn: Diane Stilson, Environmental Specialist and Airport Engineer
FAA Building, Suite 2
2725 Skyway Drive
Helena, MT 59602

RE: Yellowstone Airport – Environmental Assessment for Construction of Terminal Improvements; West Yellowstone, Montana

Dear Ms. Stilson:

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

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The existing terminal would be demolished, along with the generator building, upon completion and startup of the new facility. The existing beacon and tower would either remain in their existing location, or be relocated depending on the final terminal layout.

The Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with

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known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles. Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The Town of West Yellowstone Town Manager has noted that such infrastructure improvements could improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.

Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

**Information Request**

Please provide any comments concerning potential impacts from the proposed project on any FAA resources within the vicinity of the project as well as any additional information or comments that your agency finds applicable to the project within 30 calendar days from the date of this letter (September 28, 2019). Included for your use are two exhibits with proposed areas of improvements reflected. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred alternative for the water main alignment is Option 1 that largely follows existing motorized travel routes.

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Attn: Travis Eickman, P.E.
2880 Technology Blvd. West
Bozeman, Montana 59718
	teickman@m-m.net

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If you have any questions pertaining to the information provided, please do not hesitate to contact me direct at (406) 922-6810 or at the email address noted above.

Sincerely,

Morrison-Maierle, Inc.

Travis Eickman, P.E.
Senior Airport Engineer
Enclosures
August 29, 2019

Mr. Timothy Davis, Chairman
The Blackfeet Nation
All Chiefs Square
PO Box 850
Browning, MT 59417

Subject: Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Davis:

The Federal Aviation Administration (FAA) is examining potential concerns regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and layout are enclosed with this letter. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The State of Montana, Department of Transportation (the Airport Sponsor) has begun the process of scoping to determine potential concerns regarding this action and will prepare environmental documents for submission to the FAA to meet regulatory obligations.

The FAA has identified your tribe as potentially having an interest in the project area. Pursuant to 36 CFR § 800.2(c)(2)(B)(ii), the FAA is seeking input on properties of cultural or religious significance that may be affected by the undertaking, and is inviting you to participate in government-to-government consultation.

Please contact Diane Stilson, the Environmental Specialist at our office within 30 days of the receipt of this letter to confirm your intent to participate in this consultation. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov or send your confirmation or comments to her at the following address:

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

A public informational meeting will be held at 6 p.m. on Monday, September 16th, at the Yellowstone Airport ARFF Building (Fire Station) at 629 Yellowstone Airport Road to review
the proposed improvements, process and schedule for the EA, as well as the environmental impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

Thank you in advance for your response.

Sincerely,

William Garrison, Manager
Helena Airports District Office

Enclosures:
   Project Description and Layout

cc: (Via e-mail)
   John Murray, Tribal Historic Preservation Officer, The Blackfeet Nation
   Jason Brey, District Ranger, U.S. Forest Service
   Jeff Kadlec, WYS Airport Manager
   Tim Conway, Administrator, Montana Aeronautics Division
   Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
   HLN ADO
   file
Proposed Improvements at the Yellowstone Airport at West Yellowstone, Montana

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking.

Proposed Activity Description

The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

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The town manager for the Town of West Yellowstone has noted that such infrastructure improvements would improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.
Extending the Town of West Yellowstone’s sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Potential layouts for water and sewer lines are enclosed with this letter. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred route for the water main alignment is Option 1 that largely follows existing motorized travel routes.

Also enclosed is a proposed general layout of improvements in the terminal area.
August 29, 2019

Mr. Ernie Stensgar, Chairman
Coeur d’Alene Tribe
PO Box 408
Plummer, ID 83851

Subject: Invitation for Government-to-Government Tribal Consultation for Potential Release of Deed Restrictions at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Stensgar:

The Federal Aviation Administration (FAA) is examining potential concerns regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and layout are enclosed with this letter. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The State of Montana, Department of Transportation (the Airport Sponsor) has begun the process of scoping to determine potential concerns regarding this action and will prepare environmental documents for submission to the FAA to meet regulatory obligations.

The FAA has identified your tribe as potentially having an interest in the project area. Pursuant to 36 CFR § 800.2(c)(2)(B)(ii), the FAA is seeking input on properties of cultural or religious significance that may be affected by the undertaking, and is inviting you to participate in government-to-government consultation.

Please contact Diane Stilson, the Environmental Specialist at our office within 30 days of the receipt of this letter to confirm your intent to participate in this consultation. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov or send your confirmation or comments to her at the following address:

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

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impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

Thank you in advance for your response.

Sincerely,

William Garrison, Manager
Helena Airports District Office

Enclosures:
  Project Description and Layout

cc: (Via e-mail)
  Jill Wagner, Coeur d’Alene Tribal Historic Preservation Officer
  Jason Brey, District Ranger, U.S. Forest Service
  Jeff Kadlec, WYS Airport Manager
  Tim Conway, Montana Aeronautics Division
  Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
  HLN ADO
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Proposed Improvements at the Yellowstone Airport at West Yellowstone, Montana

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MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking.

Proposed Activity Description

The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

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Also enclosed is a proposed general layout of improvements in the terminal area.
August 29, 2019

Mr. Ron Trahan, Chairman
Confederated Salish and Kootenai Tribes of the Flathead Reservation
42487 Complex Blvd
PO Box 278
Pablo, MT 59855

Subject: Invitation for Government-to-Government Tribal Consultation for Potential Release of Deed Restrictions at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Trahan:

The Federal Aviation Administration (FAA) is examining potential concerns regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and layout are enclosed with this letter. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The State of Montana, Department of Transportation (the Airport Sponsor) has begun the process of scoping to determine potential concerns regarding this action and will prepare environmental documents for submission to the FAA to meet regulatory obligations.

The FAA has identified your tribe as potentially having an interest in the project area. Pursuant to 36 CFR § 800.2(c)(2)(B)(ii), the FAA is seeking input on properties of cultural or religious significance that may be affected by the undertaking, and is inviting you to participate in government-to-government consultation.

Please contact Diane Stilson, the Environmental Specialist at our office within 30 days of the receipt of this letter to confirm your intent to participate in this consultation. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov or send your confirmation or comments to her at the following address:

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

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the proposed improvements, process and schedule for the EA, as well as the environmental impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

Thank you in advance for your response.

Sincerely,

[Signature]

William Garrison, Manager
Helena Airports District Office

Enclosures:
   Project Description and Layout

cc: (Via e-mail)
   Thompson Smith, CSKT
   Jeff Kadlec, WYS Airport Manager
   Jason Brey, District Ranger, U.S. Forest Service
   Tim Conway, Montana Aeronautics Division
   Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
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August 29, 2019

Mr. JoDe L. Goudy, Chairman
Confederated Tribes and Bands of the Yakama Nation
PO BOX 151
Toppenish, WA 98948

Subject: Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Goudy:

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The FAA has identified your tribe as potentially having an interest in the project area. Pursuant to 36 CFR § 800.2(c)(2)(B)(ii), the FAA is seeking input on properties of cultural or religious significance that may be affected by the undertaking, and is inviting you to participate in government-to-government consultation.

Please contact Diane Stilson, the Environmental Specialist at our office within 30 days of the receipt of this letter to confirm your intent to participate in this consultation. Diane can be contacted by phone at (406) 441-5411 or by e-mail at diane.stilson@faa.gov or send your confirmation or comments to her at the following address:

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FAA Helena Airport District Office
2725 Skyway Drive, Suite 2
Helena, Montana 59602-1213

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impact categories that will be evaluated. A question and answer session will follow, and public comments will be received.

Thank you in advance for your response.

Sincerely,

[Signature]

William Garrison, Manager
Helena Airports District Office

Enclosures:
Project Description and Layout

cc: (Via e-mail)
Johnson Meninick, Cultural Resources
Jason Brey, District Ranger, U.S. Forest Service
Jeff Kadlec, WYS Airport Manager
Tim Conway, Administrator, Montana Aeronautics Division
Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
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August 29, 2019

Mr. Gary Burke, Chairman of the Board of Trustees
Confederated Tribes of the Umatilla Indian Reservation
Nixyaawii Governance Center
46411 Timine Way
Pendleton, OR 97801

Subject: Invitation for Government-to-Government Tribal Consultation for Proposed Construction of New Airport Terminal at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Burke:

The Federal Aviation Administration (FAA) is examining potential concerns regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and layout are enclosed with this letter. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The State of Montana, Department of Transportation (the Airport Sponsor) has begun the process of scoping to determine potential concerns regarding this action and will prepare environmental documents for submission to the FAA to meet regulatory obligations.

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Sincerely,

[Signature]

William Garrison, Manager
Helena Airports District Office

Enclosures:
   Project Description and Layout

cc: (Via e-mail)
   Carey Miller, Tribal Historic Preservation Officer/Senior Archaeologist
   Jason Brey, District Ranger, U.S. Forest Service
   Jeff Kadlec, WYS Airport Manager
   Tim Conway, Administrator, Montana Aeronautics Division
   Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
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August 29, 2019

Mr. Gary Aitken Jr., Chairman
Kootenai Tribe of Idaho
PO Box 1269
Bonners Ferry, Idaho 83805

Subject: Invitation for Government-to-Government Tribal Consultation for Potential Release of Deed Restrictions at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Aitken:

The Federal Aviation Administration (FAA) is examining potential concerns regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and layout are enclosed with this letter. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The State of Montana, Department of Transportation (the Airport Sponsor) has begun the process of scoping to determine potential concerns regarding this action and will prepare environmental documents for submission to the FAA to meet regulatory obligations.

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Sincerely,

William Garrison, Manager
Helena Airports District Office

Enclosures:
    Project Description and Layout

cc: (Via e-mail)
    Tracy Shottanana, Cultural Department Director
    Jason Brey, District Ranger, U.S. Forest Service
    Jeff Kadlec, WYS Airport Manager
    Tim Conway, Montana Aeronautics Division
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August 29, 2019

Mr. Shannon Wheeler, Chairman
Nez Perce Tribe
PO Box 305
Lapwai, ID 83540

Subject: Invitation for Government-to-Government Tribal Consultation for Potential Release of Deed Restrictions at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Wheeler:

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William Garrison, Manager
Helena Airports District Office

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August 29, 2019

Mr. Ladd Edmo, Chairman
Shoshone Bannock Tribes
PO Box 306
Fort Hall, ID 83203

Subject: Invitation for Government-to-Government Tribal Consultation for Potential Release of Deed Restrictions at Yellowstone Airport near West Yellowstone, Montana

Dear Chairman Edmo:

The Federal Aviation Administration (FAA) is examining potential concerns regarding the proposed construction of a new airport terminal and associated improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana. A project description and layout are enclosed with this letter. The proposed improvements and their associated activities are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended) as well as the National Environmental Policy Act (NEPA). The FAA intends to complete Section 106 in conjunction with the NEPA process. The State of Montana, Department of Transportation (the Airport Sponsor) has begun the process of scoping to determine potential concerns regarding this action and will prepare environmental documents for submission to the FAA to meet regulatory obligations.

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Thank you in advance for your response.

Sincerely,

[Signature]

William Garrison, Manager
Helena Airports District Office

Enclosures:
  Project Description and Layout

cc: (Via e-mail)
  Louise E. Dixey, Cultural Resources Director
  Jason Brey, District Ranger, U.S. Forest Service
  Jeff Kadlec, WYS Airport Manager
  Tim Conway, Montana Aeronautics Division
  Travis Eickman, Morrison-Maierle, Inc., Bozeman, MT
  HLN ADO
  file
Proposed Improvements at the Yellowstone Airport at West Yellowstone, Montana

The Montana Department of Transportation (MDT) – Aeronautics Division, as Sponsor of the Yellowstone Airport (WYS), has just completed a Terminal Area Narrative Report (TANR) that addresses planning and proposed improvements to the Terminal area of the airport, under the direction of the Federal Aviation Administration (FAA). The airport is located at 721 Airport Road in West Yellowstone, Montana.

MDT has initiated preparation of an Environmental Assessment (EA) for submission to the FAA for the construction of a new terminal and terminal area improvements. The primary purpose of the proposed improvements is to provide an updated terminal facility that meets current and future passenger, Transportation Security Administration (TSA), and Airport Administrative needs. A more detailed description of the proposed improvements is provided below. The EA is being prepared by the engineering firm of Morrison-Maierle, Inc. (MMI) in accordance with FAA requirements and guidelines. The FAA has determined that the proposed action is a federal undertaking.

Proposed Activity Description

The preferred alternative described in the TANR is the basis for the proposed action item being evaluated in the EA. The proposed action would include replacing the existing terminal that occupies approximately 12,000 SF with a new terminal facility encompassing approximately 29,000 SF. New construction would allow more efficient planning and design use of space that are currently limited by the existing structure. Space would be generated in the design to accommodate modern TSA security requirements, restroom facilities, customer amenities (restaurant, vendor services, and car rental), and airline management needs (such as baggage handling and office space). Ancillary airport support improvements also proposed include but are not limited to: access road and parking (public, administrative, and rental car), new airport beacon, apron improvements, and water and sanitary sewer improvements.

The existing terminal would be demolished, along with the generator building, upon completion and startup of the new facility. The existing beacon and tower would either remain in their existing location, or be relocated depending on the final terminal layout.

Town of West Yellowstone municipal water and sanitary sewer services would be extended to accommodate the airport buildings. Extending water service would eliminate use of a well with known water quality and quantity issues, and would provide improved water pressure for fire suppression in the terminal and resupply of Airport Rescue Fire Fighting (ARFF) vehicles. Ancillary benefits include the ability to extend service to other terminal area structures, as well as to the United States Forest Service (USFS) Fire Center to the north of the terminal area that exhibit similar water quality and quantity issues. The town manager for the Town of West Yellowstone has noted that such infrastructure improvements would improve areas of the system, as well as provide the opportunity for additional wildland fire protection in the residential area(s) to the north of town.
Extending the Town of West Yellowstone's sanitary sewer service to the new terminal area and USFS Fire Center would facilitate the abandonment of existing septic systems on the airport, and provide for more dependable effluent treatment.

Potential layouts for water and sewer lines are enclosed with this letter. While the utility exhibit reflects several alternatives that have been considered, representatives of the FAA and USFS have indicated that the preferred route for the water main alignment is Option 1 that largely follows existing motorized travel routes.

Also enclosed is a proposed general layout of improvements in the terminal area.
SUMMARY OF PUBLIC INVOLVEMENT
AND COMMENTS
APPENDIX L

SUMMARY OF PUBLIC INVOLVEMENT & COMMENTS

The Montana Department of Transportation (MDT) – Aeronautics Division has actively sought involvement from federal, state, and local agencies, as well as the general public in the preparation of this Environmental Assessment (EA) in accordance with the MEPA and NEPA processes. This coordination will be completed following the public availability period for the Draft EA. Comments received during the public availability period for the Draft EA will be addressed as required in the Final EA document and included within this appendix.

In advance of the preparation of the EA, a public meeting was held to review the EA process and provide a brief overview of the proposed project and receive public input. This information public meeting was held Monday, September 16, 2019 at 6:00 p.m. at the Airport Rescue Fire Fighting (ARFF) building at the Yellowstone Airport, 629 Yellowstone Airport Road, West Yellowstone, MT 59758. The meeting was recorded and transcribed as provided herein. Also continued herein are the PowerPoint presentation shown during the public meeting, public meeting sign-in sheet, along with written comments provided during the comment period.

The Draft EA and 4(f) Evaluation were made available for public review for a period of 37 days (starting on April 25th, 2021). Notice of availability of the Draft EA was advertised in the legal section of the Bozeman Daily Chronicle on April 25th, April 28th, and May 1st, 2021. Copies of the Draft EA, 4(f) Evaluation, and virtual open house presentation were available to the public electronically on the Montana Department of Transportation website at https://mdt.mt.gov/pubinvolve/yellowstoneairport/. Hard copies were made available during regular business hours (between April 25th, 2021 and May 31st, 2021) at the following locations:

1. Yellowstone Airport c/o Airport Manager  
   721 Airport Road  
   West Yellowstone, MT  59758

2. Morrison-Maierle  
   2880 Technology Blvd. West  
   Bozeman, MT  59718

Two comments were received via email during the April 25th thru June 1st (May 31st was a Federal holiday), with no other comments having been received after the comment period ended on June 1st. The comment letters and respectively responses to comments are provided immediately following this synopsis. Confirmation with MDT and the USFS was conducted to verify that no comments were received via the MDT website, nor received inadvertently by the USFS. Both agencies confirmed that no comments were received by either agency.
The following comments were submitted in writing to the FAA during the public comment period on the Environmental Assessment for Construction of Terminal Improvements in West Yellowstone, Montana.

Comment #1

May 31, 2021

Morrison-Maierle
Attn: Travis Eickman, Project Manager
2200 Technology Blvd. West
Bozeman, MT 59715

Jeff Kadelc
Yellowstone Airport Manager
721 Airport Road
West Yellowstone, MT 59718

Submitted via: https://mt.dot.gov/pubinvolve/yellowstoneairport/

Re: Yellowstone Airport Terminal Improvements Environmental Assessment

Dear Mr. Eichman and Mr. Kadelc,

On behalf of the National Parks Conservation Association (NPCA), I appreciate the opportunity to participate and submit comments specific to the Yellowstone Airport Terminal Improvement Project (the Project) Draft Environmental Assessment (EA).

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working with our more than 1.6 million members and supporters to preserve our nation’s natural, historical, and cultural heritage for present and future generations. NPCA has a longstanding interest in protecting national parks and their resources, both inside national parks and on adjacent lands. We are particularly interested in the proposed project and its potential impacts on Yellowstone National Park (YNP) and park resources.

The Montana Department of Transportation – Aeronautics Division (Airport Sponsor) is proposing improvements at the Yellowstone Airport (WYS) near West Yellowstone, Montana and less than one mile from the western border of YNP. The proposed improvements have been developed in partnership with the United States Forest Service (USFS) to improve WYS and the adjacent USFS Jump base water and sewer infrastructure. The WYS infrastructure improvements include a new terminal building, expanded concrete parking pad, reconstructed airport access road, construction of new parking lot infrastructure, new sewer and water...
The following comments were submitted in writing to the FAA during the public comment period on the Environmental Assessment for Construction of Terminal Improvements in West Yellowstone, Montana.

The three points included in this comment are correct, with the understanding that utility improvements for water and fiber optic will cross the Custer Gallatin National Forest between the town of West Yellowstone and the Airport. However, as stated, the infrastructure was carefully located along areas of previously disturbed travel and access routes to minimize impacts on the Forest.

The Airport has existed at the same location since the 1960’s and comparable airport lighting features have been present in this area for many decades. As discussed in Section 4.13 of the EA, light emissions are not anticipated to notably change at the airport due to the Proposed Action. Existing equipment (beacon, apron flood lighting, parking lot lighting, and exterior building illumination) is proposed to be updated or replaced with more efficient or complementary equipment. A number of the existing lighting fixtures are aged and constructed during a time when light emissions may not have been considered in regards to dark skies, and the new design will involve appropriate sighting and number of fixtures to meet lighting needs while mitigating light pollution to the greatest extent possible.

Lighting will also be required to adhere to State of Montana High Efficiency Building Standard Goals. Any parking lot lighting design will consider existing illumination methods provided and also consider methods to maintain the night (dark) skies as reasonably as possible. Maintaining a balance to provide functional lighting while reducing the impacts of artificial light will aid in the proper functioning of the Airport and natural ecosystems.

No lighting improvements are proposed for the access road corridor between Highway 191 and the main terminal area, nor any of the water, sewer, or fiber optic utility corridors.

While the release of the deed restrictions in 2018 would now allow non-aeronautical development at the Airport, no such development has been proposed at the time of the writing of this EA.

infrastructure, fiber optic infrastructure, new beacon and tower, and timber clearing for subsurface infrastructure improvements. It is our understanding that (1) these improvements are needed to meet the current and forecasted commercial aviation needs of WYS, and (2) that the Project will not encroach beyond the current airport footprint, and (3) that new and extended infrastructure will have minimal impact on the surrounding natural resources due to the careful selection of improvement sites along existing travel/access routes to WYS.

Based on this understanding of the proposed infrastructure improvements at WYS and the adjacent USFS jump base, NPCA encourages the Airport Sponsor to consider the ecological value of dark skies in the lands adjacent to YNP in the planning process for new and improved lighting infrastructure at WYS. NPCA remains concerned about the potential for increased development due to the lifting of USFS deed restrictions on WYS lands adjacent to YNP and USFS land, and we encourage the Airport Sponsor to consider potential impacts on YNP resources in future planning.

Best Regards,
Kelsie Huyser

Yellowstone Wildlife Fellow
National Parks Conservation Association
Bozeman, Montana

CC: Jason Brey, District Ranger, Custer Gallatin National Forest
Tim Conway, Administrator, MDT Aeronautics Division
Candie Sholly, Superintendent, Yellowstone National Park
The following comments were submitted in writing to the FAA during the public comment period on the Environmental Assessment for Construction of Terminal Improvements in West Yellowstone, Montana.

**Comment #2**

Thank you for commenting on the draft EA for terminal improvements at the Yellowstone Airport. You comment has been added to the file and will be included in the Final EA in Appendix L.

**Response #2**

MT Fish, Wildlife & Parks
Region 3 Headquarters
1400 S 10th Avenue
Bozeman, MT 59718

May 18, 2021

Morrison Maserle
2019 Technology Blvd. W.
PO Box 1111
Bozeman, MT 59771

RE: Yellowstone Airport-Notice of Final Draft Environmental Assessment for Terminal Improvements for 30-Day Public Review Period; West Yellowstone, Montana

Dear Mr. Erickson,

Montana Fish, Wildlife & Parks has no comment currently regarding the proposed terminal improvements for the Yellowstone Airport in West Yellowstone.

Thank you for the opportunity to comment.

Sincerely,

Montana Fish Wildilfe & Parks
Region 3 Office, Bozeman
Input:

Comments:

Questions:

Name: (Optional)

Please submit your comments:

- Utilize the electronic public comment feature at the bottom of the EA webpage at the following link: https://mdt.mt.gov/pubinvolve/yellowstoneairport/
- Hand delivered to Office of the Yellowstone Airport Manager’s Office, Attn: Jeff Kadlec, 721 Airport Road, West Yellowstone, MT 59758, or Morrison-Maierle, Inc., Attn: Travis Eickman, 2880 Technology Blvd. West, Bozeman, MT 59718 and must be received by 5:00 p.m. MDT on May 31st, 2021.

(Over for additional comments)
Terminal Improvements at the Yellowstone Airport, West Yellowstone, Montana

September 16, 2019
Welcome to the Public Meeting for Terminal Improvements at the Yellowstone Airport (WYS)

Please remember to sign in!

Proposed Terminal Improvements at the Yellowstone Airport; Sept. 2019
Purpose & Process of Meeting:

• Provide overview of proposed improvements

• To review the National Environmental Policy Act (NEPA) process

• To provide a brief overview of the environmental categories

• To receive initial public comment
Proposed Improvements

• Construct new terminal at WYS
  • Meet Transportation Security Administration (TSA) requirements
  • Improved restrooms facilities, customer amenities, baggage handling, office space

• Water and sewer system improvements for WYS and U.S. Forest Service (FS) Jump Base

• Ancillary Improvements
  • Access road and parking
  • Airport Beacon
  • Apron Improvements
Terminal Area Narrative Report (TANR)

Reviewed Terminal Alternatives

• Rehab Existing Terminal (1963)
• New Terminal – Repurpose Existing
• New Terminal – Demolish Existing

Preferred Alternative from TANR

• New Terminal – Demolish Existing
Proposed Terminal Improvements
Terminal Area Narrative Report

Architectural Historian Review

• Terminal and Beacon
  – Eligible to the National Register of Historic Places (NRHP)
  – Section 106 not yet initiated with State Historic Preservation Office (SHPO)
Feasibility of utility (water / sewer) improvements:

– Reviewed with:
  • The Town of West Yellowstone staff,
  • U.S. Forest Service (FS), and
  • Federal Aviation Administration (FAA)
– Continued discussions post-TANR
– Several options being considered
  • Sewer – maximize service for airport facilities
  • Water – preference identified by FAA / USFS
Proposed Terminal Improvements

LEGEND

SEWER

- OPTION #1 - LF = 12,100
- OPTION #2 - LF = 7,017

WATER

- OPTION #1 - LF = 27,815
- OPTION #2 - LF = 22,740
- OPTION #3 - LF = 22,240

USFS FIRE CENTER
AREA = 50.41 ACRES
Anticipated Benefits of Improvements

• Terminal that meets existing/future needs
  – Public
  – Transportation Security Administration (TSA)
  – Airport Administration

• Improved Water and Sewer Services
  – Arsenic treatment – no longer needed
  – Enhanced fire suppression support
  – Removal of septic system(s)
  – Town water system/wildland fire protection opportunities
  – Cooperative lease/lessee beneficial relationship – Town WWTP on airport
Next Steps

• Gather initial agency, tribal, and public comments

• Refine final details of Proposed Action
  – Terminal Placement
  – Beacon – Remain in place or relocate
  – Continue coordination and determine routes of water and sewer lines
National Environmental Policy Act (NEPA) Compliance

An Environmental Assessment (EA) will be prepared

• The Federal Aviation Administration (FAA) will be the lead agency
• The U. S. Forest Service (FS) will be a cooperating agency
National Environmental Policy Act (NEPA) Compliance (continued)

FAA Requirement and Procedure Orders

• FAA Order 1050.1F *Environmental Impacts: Policies and Procedures*

• FAA Order 5050.4B *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*
National Environmental Policy Act (NEPA) Compliance (continued)

State of Montana Requirements and Process Legislation

- *Montana Environmental Policy Act (MEPA) - 1971*

- State accepting the EA prepared in accordance with NEPA, but will be reviewing/commenting on EA
EA Process

• Comments regarding environmental concerns received from initial agency, tribal, and the public will be considered during preparation of the EA

• Prepare initial chapters of EA:
  • Background and Proposed Action
  • Purpose and Need
  • Description of Alternatives

• Complete field/file research to prepare remaining chapters
  • Affected Environment, Environmental Consequences, and Mitigation
    • Archaeological and biological surveys of water/sewer lines pending route determination
  • Recordation of Agency Coordination and Public Involvement
Environmental Categories

- Air Quality
- Biological Resources
- Climate
- Coastal Resources
- Dept. of Transportation Section 4(F) Land
- Farmlands
- Hazardous Waste, Solid Waste, and Pollution Prevention
- Historical, Architectural, Archeological, & Cultural Resources
- Land Use
- Natural Resources & Energy Supply
- Noise and Compatible Land Use
- Socioeconomics, Environmental Justice, & Children’s Environmental Health & Safety Risks
- Visual Effects
- Water Resources (wetlands, floodplains, surface waters, groundwater, and wild/scenic rivers)
- Cumulative Impacts
EA Process (continued)

- Release Draft EA for public review
- Public hearing (opportunity for additional public comment)
- Reasonable comments on the draft EA received during public comment period will be addressed within the Final EA
- FAA & MDT Environmental will review and consider Final EA and public and agency comments with FS as cooperating agency
EA Process (continued)

• FAA and FS Determination
  • Finding of No Significant Impact (FONSI), or
  • Prepare Environmental Impact Statement (EIS) if impacts are significant and cannot be mitigated

12-18 months timeline is typical for EA completion
Public Comment (tonight)

Public input is requested regarding:

• Proposed improvements
• Alternatives considered
• Environmental concerns
• Other relevant concerns to terminal improvements

• Comment period is being recorded
  • Responses will be provided to questions
  • Comments will be utilized to:
    • Ensure reasonable alternatives have been considered,
    • Refine the Proposed Action, and
    • Guide the EA for areas of focus and specific site issues.
Public Comment (tonight)

- Please state your name – speak loudly and clearly.
- Time initially limited to three (3) minutes.
  - Should time be available you may be given second opportunity to speak.
  - Moderator will monitor the time and advise you.
- Please be courteous of those speaking – audience should remain quiet.
- Everyone who wishes to speak will be given an opportunity.
- Can utilize written feedback forms provided in lieu of speaking.
Questions/Comments

Proposed Terminal Improvements at the Yellowstone Airport; Sept. 2019
<table>
<thead>
<tr>
<th>NAME</th>
<th>E-MAIL OR ADDRESS</th>
<th>PHONE NUMBER</th>
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<tbody>
<tr>
<td>Daniel Sabolsky</td>
<td>Town of West Yellowstone Manager</td>
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<td>Pierre Martineau</td>
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<td>Diane Stiem</td>
<td>FAA - Helena ADO</td>
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<td>Don Soi Fort</td>
<td>Gallatin Co. Commission</td>
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<td>Brad Schmier</td>
<td>Town of West Yellowstone Town Council</td>
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<td>Shane Gunde</td>
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<td>Tim Conley</td>
<td>MDT-Aeronautics Division</td>
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<tr>
<td>Jerry Johnson</td>
<td>West Mayor &amp; Asst. City Manager</td>
<td>640-7800</td>
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<td>Town of West Yellowstone Town Council</td>
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<tr>
<td>Travis Eickman</td>
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<td>(406) 587-0721</td>
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<td>Terri &amp; Richard Gibson</td>
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<tr>
<td>Douglas E. Barton</td>
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<td>Jason Brey</td>
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<td>406-823-6063</td>
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<tr>
<td>Christine Peary</td>
<td><a href="mailto:cpeary@m-m.net">cpeary@m-m.net</a></td>
<td>500 406-922-6840</td>
</tr>
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</table>
MONDAY, SEPTEMBER 16, 2019

Jeff Kadlec (JK): I would like to introduce Travis Eickman as he’s our project engineer and will be
moderating the presentation today. I’ll be available for questions as well afterwards. We also have Diane Stilson
from the FAA here, too, so she’ll be able to chime in if anyone has anything to say. All right…

Travis Eickman (TE): Take it away?

JK: Thank you.

TE: All right. Yes. Here with me this evening, we’ve also got Christine Pearcy, she’s our environmental
scientist, also out of Bozeman. Couple of housekeeping things for you – restrooms, there’s a unisex restroom here
just to the right hand side of the red racks; If you use that, just make sure and lock the door so you don’t get
interrupted. Trash - there by the sink at the back door. Sign in roster - we’ve got one going around or – like Jeff
said - please record your information on the table at the back before you leave. There’s also written comment forms
back there. We’ll have an opportunity at the end of the presentation if you want to speak, you’re more than
welcome to. If you don’t feel comfortable or you want to take one of those forms if you think of something later,
our contact information is on there. Please feel free to fill that out – you can get it back to Jeff directly, or my e-mail
is on there as well.

TE: So, this is how the meeting will proceed this evening. We’re going to provide kind of a general
overview of the proposed improvements that we’re looking to make here at the airport, a review of the National
Environmental Policy Act, or NEPA, process as it applies specifically to this project. Also provide a brief overview
of the environmental categories, and then, as I mentioned, we’ll go ahead and receive any public comment
following.

TE: The proposed improvements: To cut to the chase, to construct a new terminal building here at the
Yellowstone Airport to meet TSA or Transportation Security Administration requirements and also to improve basic
facilities for the users: Improved restroom facilities, customer amenities, baggage claim, office space and otherwise that the current facility falls short of. As part of that, we propose to extend water and sewer facilities from the town to both the airport terminal area itself, being where we’re located now as well as extending that to the Jump Base that’s here on the north side of the airport. Ancillary improvements that go along with that include rehabilitation of the existing airport access road, extension of that facility to front the new terminal footprint and also installation of the new airport beacon with a tilt tower and some apron improvements – not to expand the existing apron, it’s pretty sizable as it is, but to basically expand the concrete area and inlay that within the existing bounds of the apron.

**TE:** So how did we get to those initial improvements that we’re proposing? Morrison-Maierle completed a Terminal Area Narrative Report (TANR), essentially a Master Plan for the terminal complex, in April of this year. There were a number of alternatives that were evaluated within that Master Plan, including the rehab of the existing terminal building that was constructed in 1963. There was the option to construct a new terminal and re-purpose the existing building, and the third option was to construct a new terminal and demo the existing facility. The Preferred Alternative that came out of that TANR was to construct a new terminal and demo the existing facility. As much as we’d like to re-purpose that, with the extensive improvements that need to be made to meet code – to address the dilapidated roof, single-pane windows, and otherwise that that structure has could be cost-prohibitive to improve those facilities and then turn around and try to get that revenue back out of the lease-hold endeavor.

**TE:** This is a bit of a difficult screen to see, but will kind of give you an overview. The aerial photo is existing, the – Jeff, can you dim the front lights might help - what is on here lined out in black is conceptual. Where we’re located now is this building right here. This is the Aircraft Rescue Fire Fighting (ARFF), or fire station, for the airport. The building that you maybe saw just to the north of that with the white roof, yellow brick or yellow block façade is the Snow Removal Equipment (SRE) building. The Fixed Base Operator - or FBO - here at the north end. An existing well is located in this general area. The parking lot that serves the terminal, this building, the SRE building, and the FBO. The terminal building here is in this footprint. The existing commercial aircraft parking apron is concrete there. There is a generator building that sits off in this area… that’s for emergency power for the airfield lighting, terminal, and ARFF building. It’s diesel-fueled, so there’s an outside, exterior fuel tank for that. Existing beacon sits here on a fifty-foot tower, and then this area here is largely in use for rental cars. We’ve got a small car wash building here, and a second one was installed a year or two ago in this location. The access road basically loops in, provides a loop, and exits.
TE: The sewer, on the existing structure, comes out the south side of the building and is a gravity-flow system to the north to a lift station that's just right out here outside this building to the northeast. It also picks up gravity-flow from the ARFF and SRE buildings as well as the septic tank that’s on the FBO. All drain to that lift station which pumps the effluent up to the drain field which sits just to the south of the access road as it exits the timber.

TE: For the new proposed improvements we looked at a number of alternatives that will be covered in the EA as far as terminal placement. We had one here at the north end of the commercial apron adjacent to the ARFF building. The second location was at the south end of the apron, and the third - and what was the preferred alternative - is to locate approximately a 29,000 square foot footprint to the south of the existing terminal. That should allow us to keep the existing beacon location in place, but once again, we’ll review that through the environmental assessment to determine if that’s the best place for it, or potentially relocate that equipment elsewhere.

TE: Parking lot-wise, what you see on here is full build-out - what’s expected for a twenty-year period. It’s not proposed to build the full extent of the parking lot that is shown here with initial improvements. More than likely what will be constructed is a co-located-use for airport personnel, employees, rental cars, as well as the general public that will likely be located in a central parking area with the loop road fronting the terminal and wrapping around and exiting. That’s a very common configuration with most airport parking areas today.

TE: With respect to the apron expansion that I was talking about, it would basically be a consideration to extend this concrete apron out on the south side in case this aircraft needs to park a little bit further south to facilitate terminal frontage.

TE: As part of the TANR, we had an architectural historian review the both the terminal and beacon structures due to their age being over fifty years and their use and historic nature. They are both eligible for the National Register of Historic Places (NRHP). The Section 106 element has not been initiated yet with SHPO, but will be part of this environmental review. What Section 106 refers to, it’s the requirements that federal agencies have to take into account with respect to their undertakings to make sure that any historic properties – either private or public, structural or archaeological – are addressed.

TE: Also within the TANR, we looked at the feasibility of water and sewer and extending those facilities from town. Before we completed that endeavor, we had discussions with the Forest Service. It was actually a very
symbiotic relationship that the Forest Service was looking to improve their facilities at the Jump Base, but given the
distance and size, it’s kind of difficult for one government agency to take on all those improvements. So this is a
win-win as far as the Airport and Forest Service is concerned. If it is determined viable to extend those utilities
from town, we can take advantage of a number of different funding pots to maximize that. The Town of West
Yellowstone reviewed it with their staff – number one, to make sure that their facilities were capable of facilitating
the water pressures, the volumes, and also to deal with the effluent side of things. Convenient timing, the Town is
currently updating their sewer and water facilities plans. In talking with their engineer, Dave Noel from Forsgren
Engineering, it was determined, that – based on models – that the system should feasibly be able to accommodate
what we had projected for some initial use for the airport as well as the Jump Base. With that said, there are some
ongoing things that the Town needs to do with their existing sewer system in order to facilitate that, but the timing
of these projects also align there as well. The FAA was also involved with the feasibility side of things to make sure
that – eligibility-wise – we weren’t constraining those funding avenues to make sure that, if we were extending these
facilities for the airport that the FAA would be able to contribute.

TE: Those discussions have also continued following the April completion of the TANR. We’ve been able
to refine alternatives based on needs of the Forest Service, concerns of some of the users, and that process is still
ongoing.

TE: From those initial meetings, there were several options that were considered. With respect to the
sewer, we’re looking to maximize the improvements that not only serve the terminal, but also some of the other
ancillary structures that are on the airport, and then also the Jump Base, and then water-wise, once again, through
that process we’ve been able to define an alternative.

TE: This is kind of an overall layout of both the airport and the north end of town for orientation, Highway
191 here, Madison Addition on the north side of the Town of West Yellowstone, the town sewer lagoons in this area
– which is on airport property. We’ve got the airport terminal complex here, access road, then this is the Jump Base
complex proper at the north end.

TE: With respect to the sewer, there were two alternatives that were reviewed. The first is kind of the
yellow alignment that basically starts at the south end of the apron here… taking off from the existing terminal. It
would require a lift station to basically pump the effluent down the infield to the sewer lagoon location. But it
wouldn’t pick up the rest of the facilities on the airport. The Forest Service would have to extend their tie-in to that
force main. So what is proposed for the preferred alternative is the black line here. Basically to tie-in to the existing lift station that was shown on the previous drawing as ‘existing’ right outside to the northeast of this building. We would be able to conceptually continue that gravity flow to the north, install a lone lift-station here adjacent to the Jump Base complex that would facilitate the Forest Service combining a number of their septic systems, extending that to the lift station, have one sole location that would then pump effluent from the lift station down the infield to the sewer lagoons. The additional benefit would be to pick up the effluent from all of the remaining structures on the airport and any hangars that may build out in the future.

**TE:** Water-wise, there are three conceptual alternatives that were reviewed. This is one of those cases with the size of the property that’s out there, you could ask ten different people and get ten different options. So just to cover some of the generalities, the shortest distance between two points is a straight line. So what was proposed was to tie-in here at Iris Street, extend straight north, which coincidentally ties-in close to the new terminal location, extend it inside the animal control fence to the north to near the Jump Base. The Forest Service can then tie-in their facilities. Extend that back along the same alignment and loop it back into town around the north side of Madison Addition and tie-in somewhere near Bechler Avenue.

**TE:** One thing to consider when you’re doing a water main system is that you want to have a looped system that aids in providing uniform water flow for volume as well as pressures. That way if you have a leg in the water system that’s not able to provide as much in that area, the other direction should hopefully do so. It also provides a redundancy in the system so if that section goes down for maintenance, you’re still able to provide service from a different direction.

**TE:** The second option considered was once again to tie in at Iris Street, straight north to the terminal, hug the inside of the animal control fence to the Jump Base, and then circle back and go straight south to the north side of the Madison Addition. Both options 1 and 2 require a good deal of timber removal just for the basic installation of those water facilities. It also then creates a corridor that impacts wildlife and an additional corridor that the Forest Service also has to monitor and add to their travel program for the forest. So, from those discussions and with some elements that were initially discussed as being desirable from Town personnel, the preferred alternative is to tie in near Iris, proceed up the west side of the Madison Addition, turn along the north side of the Madison Addition, and then basically follow what is an existing jeep trail – starts out at North Dunraven in town - that you can basically drive your vehicle down, continuing on north to Hebgen Lake. So we’d be able to use an existing facility, existing
travel way, until we got up to Airport Road, basically follow the Airport Road alignment into the airport, serve the
terminal, extend north, which we could also feed into the hangar area. There is one hangar out here presently, it’s
Life Flight. Another hangar is planned – so we could serve those hangar facilities in the future – extend north along
an existing corridor where the timber has been removed, about twenty feet to either side of the animal control fence
to tie-in along the south side of the Jump Base. There’s an overhead powerline corridor that opens up and offers
enough room that we shouldn’t have to remove any timber. Continue the water line down the access road to the
Jump Base, and you cross the main access road and basically follow the alignment of the jeep trail back towards
town. We propose to extend it a little further south and tie-in roughly where Bechler Avenue extended is. That’s
the preferred alternative. It’s a longer route, but it reduces impacts on wildlife by maximizing an existing corridor,
then whoever is maintaining that system has an existing travelled way to operate that system from and also readily
fits into the Forest Service travel plans.

**TE:** Anticipated benefits of the overall improvements include establishing a Terminal that meets not only
the future needs, but really the existing needs that are already present. That’s for the general public, the TSA,
Airport administration and the other users of the airport. It also provides water and sewer services that are
improved. Presently, the airport is served by a 30-gallon-per-minute well. It serves the terminal, this building, the
SRE building, and the FBO. That well, as well as the water facilities on the Jump Base all draw water that have
higher arsenic levels. The water from town is drawn off of a spring that has more acceptable levels that fall in line
versus what they are able to pull out of the ground. It also offers – and this is a big piece – enhanced fire suppression
support. The Terminal, being a 29,000 square foot building, Code requires that anything over 12,000 square feet
gets sprinkled or has fire-suppression capabilities. Since there are no fire hydrants on the airport presently, that
would be largely improved. In addition to not only the structure, it also opens up the opportunity for any hangars
that come in that are over 12,000 feet to have those opportunities for fire suppression and one of the more important
things is fire suppression for aircraft themselves. This facility is the fire station. That truck is presently here because
it’s a water tanker. In order to resupply, they back the fire truck in, fill it through these overhead hoses, which at 30
gallons per minute, takes quite some time to accomplish. So, having a water line extend from town will greatly
enhance that water supply. It also would facilitate the removal of the existing septic systems. Taking those off line,
presently, there’s three septic tanks in the airport and two lift stations within the existing airport area proper. We’d
be able to basically take the septic tanks and the drain field portion that’s out towards the main entrance road offline.
The main airport septic system was installed about ten years ago and already exceeds its capacity during peak periods, so the County Health Department and the Department of Environmental Quality are very interested in getting that situation dealt with. In addition, the Forest Service Jump Base has a number of septic systems on their facility co-located with water wells. The water well cone of influence falls within the drain field for these wells. While we’re looking to reduce, recycle, reuse, that’s taking it a little far. These improvements will help the Forest Service also remove that situation and make it a more health-conscious system.

**TE:** The town also has the potential to benefit with enhanced fire suppression on the wildland fire side with extension of a water line up the west side of the Madison Addition then along the north side, fire hydrants or other facilities could be installed that would facilitate a sprinkling-type system in the event of a wildfire to protect those homes.

**TE:** Last thing, there’s also a symbiotic relationship of sorts. The airport is required to be as financially-self-sufficient as possible, based on their Grant Assurances. In this case, the Town is providing a service that the Airport needs, certainly, they can come to an agreement to work towards some sort of amicable agreement for the Airport to compensate the Town to offset the Town’s lease that they presently pay for the lagoons being on Airport property. So the Airport gets some benefit in service, the Town gets some benefit in reduced lease fees.

**TE:** So the next step is to gather initial agency, tribal, and public comments. Letters to initial public agencies as well as tribal entities went out about two weeks ago. We’ve given them about 30 days to provide some initial comments. If they don’t provide comments during that period, we proceed regardless, and they get another opportunity to review the document at the end. The initial public comment is what we’re doing here this evening. It’s basically to get any input from you in case there’s something we may have missed, priorities that you want us to focus on, or otherwise. That will help us refine the details of the proposed action, help us determine if our preferred alternative for the terminal placement is correct, help us determine whether the beacon’s to remain in place or be relocated elsewhere within the Terminal complex, and also help guide the continued coordination with the refinement of water and sewer alternatives.

**TE:** The National Environmental Policy Act (NEPA) is the document that the environmental review must comply with. Under the direction of the FAA, we are pursuing an Environmental Assessment. The FAA will be the lead agency on this document. While that is the case, the US Forest Service will also be a cooperating agency with the FAA since part of these facilities will serve Forest Service facilities as well as the fact that we are crossing and
impacting a good deal of Forest Service property. The specific orders that we follow from the FAA on the NEPA process is FAA Order 1051.F that covers the environmental impacts, policies, and procedures aspect of the environmental review, and FAA Order 5054.B is the NEPA implementing instructions for airport actions. These two documents are what guides the complete focus and format for the Environmental Review.

**TE:** In addition to the NEPA process, since the Airport is owned by the State – it’s on State ground – it therefore has to follow the State environmental processes, which specifically falls under the Montana Environmental Policy Act (MEPA). So you have NEPA on the Federal side, MEPA on the State side. Instead of having dual documents competing as we go through this process, MDT Environmental has consulted with the FAA and is in agreement that the EA that’s prepared for the FAA will, in fact, meet the state processes. Now just to be sure that we’re not missing anything that the State wants us to focus on, or there’s a format that needs to meet their criteria, the State is also going to be reviewing this in conjunction with the FAA, so we’re going to have multiple facets of review during this process.

**TE:** We will take any comments regarding environmental concerns that we get from the agencies and tribes or this initial public comment. From that, we’ll be able to prepare the initial chapters, which is the Background and Proposed Action, Purpose and Need, and then into further discussion of the alternatives. As part of that, there will be both research in the field as well as file research. Information will be gathered on the environment and a chapter prepared on the Affected Environment and Environmental Consequences. This will include preparing any conceptual mitigation to offset any impacts that are found. Part of that process is having an archaeologist actually walk the route of the water and sewer alignments as well as the greater footprint of any improvements that we would impact for the Terminal or anything in the greater Airport area. In addition to that, we also have an environmental scientist complete this same walking survey to gather any information on sensitive plants, wildlife, and endangered species that are in that corridor. We will also record any agency coordination and public involvement, so once again, this evening’s presentation and comment will be transcribed and submitted as part of the EA.

**TE:** Environmental categories - these are the specific categories that NEPA and the FAA orders require review of. The first is Air Quality - this will be a quantitative review that will basically come up with an estimate of construction equipment and number of days of use to actually complete the construction. That information will get
input into an EPA – Environmental Protection Agency – model that will output emissions projections, and that will
go into this Air Quality analysis.

**TE:** Biological Resources - this is your plants, wildlife, endangered species.

**TE:** Climate is your greenhouse gasses.

**TE:** Coastal Resources – we don’t have any coastal environments in Montana, however, this is something
we’ll touch on briefly.

**TE:** Department of Transportation Section 4f Lands will be reviewed. This is any impacts on land from
publicly-owned parks, public trails and recreation areas, wildlife, waterfowl refuges, and then any public and private
historic properties.

**TE:** Hazardous Waste, Solid Waste, Pollution Prevention will basically make sure that we’re not digging
through any SuperFund sites or if there are any existing facilitates in the area that we need to be concerned about
and to make sure our project improvements don’t impact those areas.

**TE:** We’ve touched on the Historical, Architectural, Archaeological, and Cultural Resources that we
review.

**TE:** Land Use makes sure that what we’re planning on doing is compatible with other land uses in the
area.

**TE:** We’ve also got Natural Resources and Energy Supply – to make sure that whatever we’re constructing
doesn’t put an unacceptable drain on the existing facilities.

**TE:** Noise and Compatible Land Use. That will be more of a qualitative review. We’re not going to be
changing the aircraft patterns or otherwise, so this would just be addressing that from a noise aspect. It’s mostly
construction-related.

**TE:** Socioeconomics. That’s the impacts on businesses or residences that need to be relocated, any
impacts on jobs or potential development that is proposed and impacts with vehicle traffic.

**TE:** Environmental Justice – that’s your low-income and minority populations and then Children’s
Environmental Health and Safety Risks will also be reviewed as part of that analysis.

**TE:** Visual Effects – includes parking lot lighting, apron lighting, anything with respect with nighttime
illumination. We cover that in generalities. We’ll also look at the visual impacts of the terminal itself. The idea
there is to make sure that it blends in with the local environment and local architecture. It will likely be modeled
something after the lines of what the park services has in Yellowstone Park versus something you might see on the
downtown strip in Vegas – that is not the intent.

**TE:** Water Resources – this is the full realm of wetlands, surface waters, ground water, flood plains, and
wild and scenic rivers

**TE:** Lastly is the cumulative impacts. As a stand-alone project, if it’s determined that there are no impacts
that are significant in and of themselves for this project, we also need to look at what other projects that are going on
in the West Yellowstone area to make sure that these project impacts tied in with those project impacts don’t elevate
an environmental issue to a significant level.

**TE:** Once we’re able to compile all that and get that document moved through MDT Environmental, the
FAA, the Forest Service for their respective pieces, we’ll be able to turn that out to the general public for their
review. That will go out for a 30-day review period after which time we will have another public meeting – in this a
public hearing, where we will review the findings and go through each of the environmental categories with respect
to the preferred alternative(s) as well as other alternatives, and let you know what those findings are. Any
reasonable comments that we receive – either through tonight or during that process - will be included in the EA and
any of those questions or comments will be specifically addressed. Once that is all complete, the FAA and MDT
Environmental will review the full package again. They’ll evaluate the public and agency comments on that final
document, and then with the Forest Service as a cooperating agency, they’ll make a decision as to whether or not
that falls under one of two determinations. If there are no significant impacts, there will be a determination of
Finding of No Significant Impact (or FONSI), or in the event that there is a significant impact that can’t be
mitigated, it will elevate to an Environmental Impact Statement (EIS). Just for informational purposes, a typical
Environmental Assessment of this magnitude takes 12-18 months.

**TE:** Public comment, which we’re looking to receive this evening, is requested regarding the proposed
improvements as well as the alternatives considered, whatever environmental concerns you may have on specific
areas, and then any other relevant comments with respect to the terminal improvements. Just as a reminder for
comment, this presentation, as well as the comment period after, is being recorded. We will transcribe that, and it
will be provided in the Environmental Assessment for future reference.

**TE:** As far as comments tonight, we’ll do our best to answer any questions. If I can’t personally – we have
a lot of agency representatives in here that might be able to touch on that or we can certainly address that in the
Environmental Assessment as we move forward. Comments will be utilized once again to ensure that we’ve got some reasonable alternatives identified that we can use to refine the proposed action, and that will help focus and guide us on these specific areas that we need to have within the EA.

TE: For the public comment tonight we would like to review some ground rules. I know a lot of you have already been involved in these conversations, so I don’t know that we necessarily need to limit you to three minutes. If you do desire to speak, I do ask that you please do so loudly and clearly so we can pick that up on the recording and everybody else can hear you. Time limit-wise, if we get carried away, I’ll have Jeff give me a nod and we’ll try to move that conversation along to give everybody an opportunity to speak. We’ll certainly give you another opportunity if you’ve got more questions. If you also do not feel comfortable speaking or asking questions this evening or you think of something after the fact, there are comment forms in the back. Please pick one up on your way out and you can get those to Jeff or myself. Our contact information is on there and we’d be happy to include that in the EA.

TE: So with that, I’ve got both exhibits here at the end of the presentation for quick reference, if there are any questions or comments. That concludes our presentation. I’m happy to address any questions or public comment that anybody has at this time. I do ask that you provide your name as well up front just so we can record that as well.

Terry Gibson (TG): Terri Gibson…

TE: Terry Gibson?

TG: Yes, when you said the FBO, is that the private airport, is that maybe weird, considering the alternative options?

TE: While the FBO business is private, they lease the ground from the airport, and the FBO facility as far as facility-wise for water and sewer, does obtain their facilities from the airport’s existing system.

TG: And does that include the people that camp there?

TE: The campground is not part of the FBO business or lease and presently is under review by the Gallatin County Health Department. I believe Jeff actually has a meeting with them tomorrow, but that is something that we are working through whether or not that becomes a pit-privy type setup for now or in the future. Certainly, if sewer facilities are extended to the north, that could be tied in.
TG: And are you getting numbers on how those people that stay there so you know how many people use it?

JK: We have a log... a pilot log with registration that’s completely voluntary so there is the potential for inaccuracy in the reporting. Estimates are around 100 a summer – users – is what we’ve estimated, and that’s the number we’ve provided to the County Health Department. Right now, there’s a pit-privy toilet there with a completely sealed vault and we’re in the process of upgrading that and seeking a variance with the County for its continued use. The pending meeting is actually Thursday morning at 7:00 at the courthouse.

Jerry Duns (JD): A couple questions about the water and sewer line locations. First on the water line, goes behind the Madison Addition. Is that planned to be on the – or near the frontier trail – or is it going to be along the old road – the logging road that went back there? What supposed route, or is it just straight across from the road that heads – because you’re looping it, right? Or are we just -

TE: Correct. We’re talking about on the north side...?

JD: Right, are you aware of that’s going to go?

TE: We have yet to refine those discussions with the town.

JD: Okay. Also, the water line that is going to follow what is considered the Madison Arm Road, the recreation road that you’re talking about? When you put that in, will you put it off to one side, like will you put it to the Forest Service side in between the highway and that road, or will you put to the west or will you put it right down the middle of it, and will it – at some point – have to be protected, which would/could change winter and summer uses. And I use that example because of our water line that comes from Whiskey Springs is blocked off from any winter and summer use on that. And its an older facility.

TE: Sure.

JD: So I guess I’m wondering how you’re going to protect that and how it’s planned. I would hate to see, at some point, and I’ll use a word that I hate to use - because of terrorism problems that we have in the United States, at some point are we going to end up having to close off that whole area to Highway 191, to the airport access, because we have those lines in there – sewer and water – coming from here. Those were my questions, I know you can’t probably answer them right now.

TE: Sure.
JD: Also the same question for the sewer line, too. Is that going to be also a protected – you’ve got to clear it first, and then is it going to be blocked off somehow by a fenceline or whatever for access.

TE: Okay, thank you.

JD: There was a lot of stuff there, but know you wanted to stop.

TE: That’s okay. You were on a roll. If I miss something, let me know and I’ll come back to it. With respect to your question as to where exactly is the alignment going to fall. That is something where we need to refine that with further discussions with the Town and USFS and design. What is presented here is generalities at this point in time. We certainly want to take advantage of any existing travel corridors – old roads, trails, or otherwise – that are already established. That’s a reduced impact on the travel system for the Forest Service. Where it fits with respect to that trail or road facility is something that we’ve got flexibility with. What we’re planning to do on the environmental side is basically take a 200-foot corridor to be reviewed generally on that alignment. That way, whenever we do get to the design stage - and this is kind of a chicken-and-the-egg scenario – when we get to the design stage, we’ve got flexibility there to offset it outside of those existing – I’ll say ‘under the wheel paths’ – outside of that, or if you’ve got fire hydrants or otherwise, you can extend a leg out into the timber so that snowmobiles aren’t clipping the tops or otherwise in the wintertime. And so exact alignment-wise is something that can really be worked out in the design phase. We’re going to take the larger footprint to evaluate on the environmental and give us a corridor to manipulate and run that water and sewer line in. Did that answer that question?

JD: Mmm-hmm.

TE: Okay. Number two… see if I get these in the right order. With respect to the sewer line, that the largest – I’ll say, a good part of the footprint of the airport falls within an animal control fence. It’s not a security fence, that’s an ancillary benefit of it, but anybody with wire cutters can cut it and get in. With that said, the majority of the sewer improvements would be inside the animal control fence. That includes this north section basically from the lift station - everything to the north to the lift station out to the infield and all the way down until we get right to this – there’s another area there that’s inside the animal control fence. There would be a little lag where it crosses the road from the airfield fence over to the sewer lagoon location for future mechanical treatment plant, or whatever the Town ends up developing, so there’d be a short section there which would be largely underground anyway. So sewer-wise, that’s a much more manageable issue than your concerns about a water line
outside the fence. Naturally, we’ll need to consider options as we extend a water line this far, that’s a long way to push water without having some blow-offs, opportunity to flow water to fire hydrants, blow-offs or otherwise, you have potential openings in your system there. There are devices out there as far as locking up fire hydrants or otherwise to keep those only accessible by Town personnel or whoever operates that system, but with that said, they’re outside the majority of the public view… it’s not something you pass on a daily basis when you’re driving up and down the street to City Hall. It is certainly something that needs to be considered and evaluated further with the design to make sure that any such protocols or safety guidance that the Town needs in place are part of that design. As far as where we put it in the jeep trail alignment, we’re intending to basically loop out and around and come back along the same line. It doesn’t mean we’re stacking lines right next to each other – we don’t want to do that – just for future purposes for maintenance and otherwise, we’d probably separate those by at least ten feet if not more. So we may have one that flows down the west side of the road, we may have one going down the east side of the road. Honestly, it would be preferable to keep them outside of the road alignment, that way if you ever do have an occasional well incident or otherwise, you still have a backup facility to use. Did I address the third questions in there? I don’t know if I answered all three…

JD: Yeah. I think you did.

TE: Okay.

JD: I think you answered the first one right away.

TE: The other ones I kind of…

JD: Yeah….

TE: … chicken-souped it.

JD: Thank you.

TE: As long as I got there is what’s important.

JD: All right.

TE: Okay. This is something were – really – the FAA requires us to evaluate the environmental side before we really get into the nuts and bolts of design. If we’ve determined that there are no significant impacts on any of the environmental categories, that then allows us to go to the design stage and basically open up our toolbox, work with all the players at hand – which you’ve got four government agencies being the FAA, Forest Service, MDT Aeronautics division is the owner of the airport, and the Town of West Yellowstone. So all four parties have
to agree on what this end piece is in order for it to be successful. But before we can even get there, we need to make sure that, environmentally, we aren’t kicking the cart before the horse.

Brad Schmier (BS): Question.

TE: Yes.

BS: My name Brad Schmier. What is your timeline for the proposed project?

TE: Certainly. The EA is intended to be wrapped up in 2020. We’d like to start the design in 2020 – in the summer or fall – if all goes well. That will carry around to the spring of 2021. The earliest that we would propose starting any improvements, basically building it or putting in a terminal foundation – bringing that out of the ground – would be 2021. Just based on the size of building, the building weather conditions in West Yellowstone, it’s likely going to be a two-year endeavor. So therefore, with once the terminal is completed, the earliest that we would see water and sewer facilities coming onboard would likely be 2022 at the completion of the terminal. Now, in the event that the Town facilities are not up and operational at that time, that’s something that we can look at the transition time from the old terminal to the new one or plug the new terminal into a septic system for a short-term solution if the Department of Health for the County and DEQ is acceptable to such an idea. So, really, we’re not expecting a terminal to be open and operational any earlier than the fall of 2022. And a large part of that depends too on funding. The FAA at this point is identifying that the 2021-2022 period is conceptually looking like that may come to fruition. Building costs are going up, really, we’ve got some conceptual ideas on what the costs may be, and that’s largely based on what the Butte Terminal costs, but this isn’t Butte, this is West Yellowstone. So we’ve put in a contingency factor on the Butte Terminal costs. That was a brand new terminal with terminal demolition, expansion of parking lot and water and sewer facilities, so we think we’re in the ballpark. We really won’t have a good concrete idea on refining costs until we’re partway through the design. So, once we get there, if our numbers are still good and we’ve got a conservative number, the FAA, all things considered, will hopefully still have that funding lined up. If not, it may extend the process a year or two until that funding is available.

BS: So you say fall of ’22, it could very well be the spring of ’23.

TE: It could be. Yes. Absolutely. There’s a lot of improvements that come in with this. We’ve got – and really, we don’t want to get too ambitious with reconstructing the access road and constructing the parking lot and otherwise until that terminal is a ways out of the ground. We don’t want construction equipment beating up new pavement facilities, if at all possible. So, it could very well be Spring of ’23.
BS: My next question then – it may be a Forest Service question, I don’t know. But your preferred alternative on the water line – and you were mentioning, you know, again, when you get to the design phase, you’ll know more about that. But if that requires any significant amount of tree removal, what’s different about doing it there versus a different location.

TE: Well, the issue there is that it’s tied in in the immediate vicinity of an existing travel corridor. So,

BS: And how wide is that travel corridor?

TE: The existing Jeep trail? It’s probably on average, twenty feet wide, if not more – that’s cleared out there.

BS: So, that’s the roadway width.

TE: That’s the roadway width. Yes. Now as far as swinging an excavator in there, getting loaders and otherwise, trucks with bedding material, hauling pipe or otherwise, that may need to be expanded out a little bit.

BS: Well, and you mentioned possibly being on one side or maybe both sides, so that’s got to be outside that twenty-foot corridor, so now how wide is that travel corridor become? I can see tree removal.

TE: There is potential – Yes, there is potential -

BS: Well, otherwise, you’re going to have to close the road and I don’t think that’s going to be acceptable.

TE: And that’s something we can work on –

BS: That’s down the road.

TE: … in the design phase, as well.

BS: So the real question there, if that requires any kind of vegetation removal down through there, what makes that any different than a new line through the forest that is not adjacent to that roadway?

JK: Let me take a stab at that. Part of the reason, Brad, that that alignment along the Forest Service road came into play is that it has to do with the permanency of that road versus establishing some sort of defined road corridor with that orange line in the interior of the forest right there. And the easiest example that will show environmental tradeoffs when you analyze the alternatives on that is when it comes to grizzly bears and secure habitat, any time you can avoid creating a new permanent facility (i.e. a road), whether that’s open to the public or not, versus using an existing road to maintain that infrastructure – that water line. Typically, it’s going to come out better looking environmental-wise by placing that water line on an existing open road versus cutting a new path through the forest. And that’s already highly-impacted when you think of Highway 191 plus the Forest Service road adjoining next to
each other. But, to Travis’s point, that will all come out when they go through the environmental analysis and look at
the tradeoffs of doing one route versus the other.

**TE:** No doubt, whichever alternative is considered, there will be tree removal that’s involved. Certainly, we
want that minimized as well. Along that jeep trail, there are areas that are pretty open where you’ve got one single or
doubled up on trees that contractors can work around in some cases. Certainly, we don’t want to go through there
with an established “you must mow down everything within a hundred foot width.” That’s excessive. We can
certainly work with Forest Service, work with the Town on what is an acceptable compromise during that process.

**BS:** Okay.

**Dan Seifert (DS):** One question. Dan Seifert for the Gallatin County. I guess this is for Jason. How does
this timeframe that you’re looking – that Travis was talking about here – how does that align with the Jump Base and
the chance to do that – those improvements.

**Jason:** The timeline is fine for us. I think the State and the FAA are probably on the more aggressive timeline
compared to the Forest Service. But it is still very opportunistic and the timelines do match up for what ideally what
they’d like to do and what we would like to invest for the Jump Base for the future.

**TE:** And once again, these improvements can go in without anything with respect to the Jump Base. They’ve
got their own interior plans that they’re working on with their engineers. The timing of that – of course, we can’t plug
into a system until it’s there, but the completion of the system is not dependent on whether or not the FAA ties in
immediately at that time. Certainly, there’s pieces of this that are for the benefit of the Forest Service that the FAA is
likely not going to be able to pay for, eligibility-wise. The FAA is not in the market of funding private enterprise, it
also becomes awful sticky when they cross property boundaries outside of an airport to serve another government
entity. That’s why the lift station is still shown on airport property. That will allow the FAA funds to be a little bit
more free-flowing than being constrained by potentially double-dipping and serving another government entity.

**TG:** Terry Gibson again. So are the airport and/or State willing to sell that ground to the Town so when
they build the facility we need it will be on town-owned property, not leased property.

**JK:** You know, that was looked into… what, two years ago, I’d say… when we renewed our lease in 2015.
We checked with the FAA and it’s not possible for us to sell the property.

**TG:** So being a town person, I think it’s irresponsible of the town to spend that kind of money to put a
facility on leased ground, so it would have to go someplace else or they would have to consider selling it to the Town.
JK: We can also discuss in the negotiation process when we renew the lease a longer term if that is desired.

TG: Well, you have to understand if they put twenty million dollars into a project or fifteen - whatever it’s going to be - and in twenty or thirty years you guys decide you don’t want to renew the lease or you want to quadruple the rate, that’s I think that’s just irresponsible of the Town.

JK: That’s a decision made a long time ago, so, now we’re working with what hand we’re dealt. And I can tell you at least from our standpoint, as the manager of the airport, we’re working as cooperatively hand-in-hand with the Council to make it as fair – fair market value for both entities and that’s what we did with this last lease. And as a user, I would assume we would do the same thing as we would pay fair market value for the services.

TE: The relationship between the Town and the airport should be symbiotic. Really, they both benefit each other. And, as such, it really serves no end game to, I’ll say, set the screws to one entity or the other. Through this process, we’re looking to provide some enhanced facilities for the Town, for wildlife, and for wildfire protection adjacent to the town. Also open up opportunities for the Jump Base to become a little more viable as well as the airport to become more viable to provide some services for hangars or expansion of the FBO or otherwise here to provide a more viable airport. It’s the FAA Grant assurances, when we take Federal money – the Airport takes Federal money, there’s a requirement that they try to do the best that they possibly can to be self-sufficient, And as-such, that’s where the lease requirement has been reviewed with the Town lagoon system to try and help generate revenue for the airport to keep it a viable entity. Now the footprint that the lagoons falls within is in the approach surface and Runway Protection Zone for the Airport. That’s a protected surface that the FAA needs to make sure is under the Airport’s control. That way, they can better address and mitigate any issues there as far aircraft approaches and departures. It’s really a safety element. So that footprint and the reason it’s being retained is largely to meet those requirements that the FAA has dictated. Now, as far as the symbiotic relationship side of things and the lease element side of things, that’s one that has been discussed at great length and it still has a marathon run to go, and that’s something where all parties need to come together to iron out what that looks like. The earliest that anything along those lines – where airport facilities would need to tie in to Town facilities is a ways down the road. However, that is certainly something that, once we start the design phase of the project, will really pick up momentum as we try to and incorporate improvements to benefit the Town, meet the town’s concerns as far as alignments, what that system looks like, who ends up maintaining it, etc. Then, as part of that, weighing the cost-benefit side of things, and determining what is fair for all parties. It’s not going to be easy. It’s going to be a thesis, I’ll say that.
JK: And from my perspective, I mean, this will benefit all of our partners here, we want to work together for the public and the community. There’s one thing I would point out… us tying into the sewer is going make us committed to the sewer lagoon even more. Once we have that service out here, it’s in the Airport’s best interest to not run the Town off – not that we would – but I think it solidifies you know, that a little bit, if that was a concern.

TG: Well, I understand that, but I wouldn’t build a house – a multi-million dollar house - on leased land.

JK: I understand that, but people do, actually. I know there’s State airports that have built houses on leased property.

Unknown: Jeff, early on in this presentation, you said that the Town Engineer told you that there would be enough water and sewer facility for the expansion.

TE: Conceptually, based on what was input into the models for the volume that was estimated at the time for – that was the terminal, adding on some ancillary structures through here, some hangars, and then there were some also flows from the Jump Base that had been estimated – those were provided to Forsgren to say okay, here’s some potential numbers, based on the models that you are developing with the water and sewer facilities plan, conceptually, feasibility-wise, does it look like it’s even able to be considered? The answer was ‘yes’ on both accounts.

Unknown: So, with your explanation, all of the decisions that were made by our Engineer were based on estimates, not actual numbers.

TE: Anything going forward is based essentially on estimates, as is standard with such design.

Unknown: But, my question is: Do you have any numbers – actual numbers – of uses that have happened at this airport in the last ten years.

JK: Yes, we do. We actually have been logging that because of the – and Travis mentioned it earlier – that we’re at times exceeding our permit levels for the septic systems.

Unknown: So you do have actual numbers.

JK: Yes, I have them…

Unknown: No, no, I’m not asking for them, I just wanted to make sure – I just want to know if we’re going off guesstimates or if we’re going off real numbers. I mean, as you well know, we’re in a situation, and one of the situations is water. I’m more concerned about water usage and it will meet our requirements for having full backup depending on what you’re going to need. I just want real numbers when we get to that point. And if we have to build something different than we would without the Airport there and hooked on, that does have environmental impacts.
TE: Certainly. And the discussions haven’t gone to the extent of knowing how much capacity you actually have. It was just brought out on the table as, “is this even feasible to consider?” The answer was, “yes.” Now, that was based on the airport taking monthly flow readings from their force main to their drain field. So those are recorded on a monthly basis – monthly, correct? Or bi – every two weeks…”

JK: We’re on weekly…

TE: Weekly. Okay. We’ve got those on a weekly basis – that’s last year and this year – to document what the flows are from the terminal, this building, the SRE building, and the FBO. Now, the hangar that’s down there, that also has a flow meter on it. I haven’t seen the results of that, but they’ve got a drain field, so certainly their use with their – they’ve got four full-time staff there 24/7 for the life flight – that would be a heavy-use facility – they’ve got laundry and otherwise, showers – so, basically, a four-person house. Take those numbers along with what is projected from the terminal – we can use Butte as a model for what the actual flows are based on enplanements and use of the airport to get pretty close. And then, of course, with fire flows and otherwise, once we design the building and know what it looks like, we can determine what those flow requirements are for fire protection. And really, that’s what’s probably going to be the driving element for the sizing of the water main and the biggest impact on any water facilities with respect to pressures and volumes is the fire protection side of things – not the day-to-day use. That’ll be small enough that it should be pretty minimal compared to a fire incident.

Unknown: Are there flow meters on the Jump Base, too?

TE: I would guess no.

JK: Yeah, I don’t know the answer to that.

TE: Based on the age of those systems, unless the County Health Department or DEQ has requested it, I don’t know.

JK: And just my observation, actually, I’ve been attending the recent town council meeting. Our ballpark numbers, we’re about equal to four houses of the Madison Addition is what the campus here is at today, just to give you something to compare to. Flows about 250 gallons that number that was in the presentation – I believe it was per household average.

TE: 250 Gallons per day?

JK: Per Day, yeah, and we’re right at 1,000.

Unknown: Thanks.
**Unknown:** Based on the flow, there’s probably a good chance another well may be needed for the town besides the one that we’re going to bring on. I think that’s what you were asking. Because we need to have 100% backup if our number one source goes out. I think we would probably need one more well to achieve that.

**TE:** I think that was discussed with town staff.

**Unknown:** Yes

**TE:** …Forsgren also.

**Terri Gibson:** Terri Gibson. When you just said the flow’s 1000 gallons a day, does that include the car wash, the restaurant, the terminal and everything?

**JK:** Yeah, all the water that’s coming off the well has a digital meter on it, so yes. It does.

**TE:** And keep in mind that the car washes are literally hoses, they’re not a full-blown car wash that you get to drive through.

**TG:** Right.

**TE:** This is about as simple a car wash as you can get, so water usage is pretty minimal compared to a Town Pump-type car wash. And in the event that Town facilities are not deemed a viable entity, we can still get by with a water-cistern-type tank here on the airport with a fire pump to serve the terminal building as far as fire protection is concerned. The new terminal can still have a high-maintenance – and expensive arsenic removal system. We can still look at a Type-2 sewer treatment system on the airport. When we’re looking at the environmental side of things, we’re picking up this whole footprint of basically everything from the apron to the property line – everything to the north of this footprint is being reviewed for the archaeological side of things as well as biological side of things, so in the event that we need to shift gears at some point, we can evaluate whether or not those facilities would be an environmental issue on the airport.

**JK:** … not desirable, though.

**TE:** Not desirable. And the reason for that, even with the lagoons at the south end of the airport, open water is a bird attractant. Birds and aircraft do not play well together, and so that’s why the FAA is actually encouraged to hear that the Town is looking at more of a mechanical system for the wastewater treatment. That would conceptually reduce the size of the lagoon area and reduce the surface water, reduce the wildlife attractant element for birds. So as far as upgrading to a mechanical plant, that is something that the FAA has verbalized that they are more acceptable to.
than the system that is out there presently. What we don’t want to do is put in a Type-2 system – another potential lagoon system – on the airport and expand that water footprint.

**Unknown:** Your existing wells, would you keep them or abandon them?

**TE:** Existing well, there’s only one for the airport - at 30 gallons per minute. I don’t know why it would be continued to be utilized, really. I mean between the arsenic side of things, unless you just wanted to run the car wash off of it, we could certainly tie it in to the airport to basically address any – say – non-potable uses. So you could use it for car wash to reduce impacts on the town.

**Unknown:** It might be more related to the smoke Jump Base when you’re mixing retardant, I don’t know how much water that is….

**JK:** Yeah, our intent right now would be, if we did in fact hook up to Town water would be to keep the well, but solely for wildland firefighting.

**Unknown:** Potable vs. non-potable…

**JK:** Yeah, for tankers…and water scoopers.

**Unknown:** Cause we very well do know that things happen to artesian wells. And regular wells, they slow down sometimes

**TE:** Certainly.

**Unknown:** So sometimes it’s good to have backup.

**TE:** Yes. The thirty gallon per minute well isn’t a lot of backup for a large facility like this, but, if you’ve got it, you might as well use it. I don’t disagree with you. It’s a very good comment. Thank you.

**Unknown:** When you guys do the lighting in the parking lots, will you look at light pollution or is it better to have brighter lights at the airport?

**TE:** You’ve got to be careful with the blinding effect from lights with pilots that are landing at night – Life Flight is a good example – they’re flying with their night vision goggles on. That’s a very large detriment. Also pilots that are flying in that have been accustomed to the night side of things if they’re flying in and have a rather bright environment, that’s rather blinding and a negative experience. So any apron lighting is more or less aimed down just to direct traffic to this is where the terminal is. Granted, the Yellowstone Airport doesn’t get a lot of terminal-type traffic at night, it’s more related to private comings and goings and Life Flight. With that said, the parking lot can certainly be lit, but, especially with the Yellowstone environment and proximity to Yellowstone Park, an element that
might be very attractive, yet still serve the same purpose is something along the lines of what the park service installed three or four years ago at Yellowstone Lake Lodge. Their parking lot in the back – if you’ve seen it – its got lights that are aimed down and lower wattage. I was there two weekends ago, and I was rather impressed with the lack of light pollution, so you can still see the stars and otherwise. Now, with respect to impacts on the town, the lighting is going to be below the tree level. It’s very unlikely that even if it was lit up like a football field that you’d even notice it from town at night. With that said, we don’t want that kind of atmosphere out here for pilot safety. And so, certainly, the lighting element will involve probably LEDs, it’s all about how they’re shielded and directed more towards the ground and softened versus up and out, if that helps.

Unknown: Um-hm.

TE: Beacon-wise the intent is to be able to see that from a long ways off. The existing beacon is a fifty-foot tower that has an ancient beacon that we’ve actually robbed parts for from other beacons that have been abandoned in the state. And so MDT Aeronautics has a stockpile of old parts that they use to try to keep it going. It does not actually meet FAA standards. It does not rotate fast enough, it’s kind of on its final legs. We’ve had numerous beacons very similar to it that have melted – literally – in the last several years, and so, that facility is one that needs to be abandoned. We can’t remove it and demolish that and get rid of it in all entirety because of its tie to the historical nature of the aviation industry as well as the area. So, if we can leave part of it on the airport as a display and put in a new beacon on a tilt tower that’s safer for airport staff to maintain and still meet the FAA requirements, that’s the intent going forward with the beacon for the lighting side. Likely be an LED beacon, which will certainly probably be brighter than what’s there presently, but once again, it’s not going to be elevated to the point where you should see it from town. Yes, Doug…

Doug Barton (DB): Doug Barton. Speaking historical and architectural, have you looked at the old terminal as far as the historical, architectural, and all of that sort of stuff.

TE: Absolutely.

DB: As far as demolishing it…

TE: Yes. While that’s the preferred alternative, that evaluation that our architectural historian completed will go through the Part 106 process with the State Historic Preservation Office (SHPO). They will help work with the FAA to guide that process as to whether or not we can take elements of the existing building and tie them in with the new structures that will allow us to demolish the existing building, or if there are just too many elements there that
need to be maintained and kept going forward for historical purposes. The thing about that structure is – while it looks
good from the outside, when you get up close, it is very much a dilapidated, high-maintenance structure. It was meant
for summertime operations. The maintenance on it – on a structure that was built in the 1960’s is no different than a
house – it’s going to go up. You’ve got hazardous materials in there, as far as asbestos floor tiles. You’ve got electrical
panels that are open to the general public. You’ve got wiring that’s exposed. You’ve got a roof that leaks. You’ve
got single-pane windows… the list goes on. It’s got a basement underneath it such that it would be great if you could
just knock out some walls, put in some big doors and use that for your fire station. However, with the basement
structure that’s there, it was never designed for that. We may have to make some modifications in order to make that
a viable alternative to use it as such. Whether the FBO would want to occupy that or use it as another airport facility,
it would be a lot of money to bring that up to code. Also, with the proximity to a new terminal, we want to make sure
to protect that area for commercial aircraft, and so putting a use that’s not terminal-related in immediate proximity to
that is not a good recipe for success. So, the preferred Alternative is to, say, wipe the slate clean. Certainly, MDT
Aeronautics, as the Owner, wants to incorporate some of those elements as reasonable as possible, but really, that
determination will be made with SHPO. Same goes with the beacon, and really, with some preliminary discussions
we’ve already had with them, we’ve already determined that the beacon cannot be removed in entirety. It’s either got
to remain in its present position, or they’ve given us an alternate location to where we could move it to and basically
put a plaque on it for historical purposes.

DB: Thanks.

TE: Good questions. Good comments. Good suggestions.

TG: When you guys were run your numbers for the water and sewer and getting to the Town so we know
what to expect so when we’re doing our facility, we can allow for that. Are you going to have in mind how many
hotels or whatnot might be considered with the airport or expansion?

TE: Excellent question. With the release of the deed restrictions that occurred about a year ago, it opened
up the opportunity to consider uses that are non-aeronautical related. A hotel is certainly one that could be considered.
However, that is not as simple as them showing up, putting a proposal on the table, negotiating a lease, and away they
go. Anything that comes out to the airport that is built on airport ground that is non-aeronautical – or that even is
aeronautical, for that matter – has to go through an environmental review process. Depending on what the complexity
is, it may have to go through a full environmental assessment. Now, with respect to the sizing of facilities for water
and sewer... what the FAA will fund, what is eligible, is what the airport facilities require: that’s terminal, that’s the ARFF building, that’s the SRE building, that’s hangars, so if you’ve got some larger box-type hangars that are over 12,000 square feet, that’s a sprinkling element you need to consider. The FBO – it’s a private enterprise, but they lease from the airport, and so they serve the general flying public. Therefore, that is a use that the FAA would consider – they wouldn’t extend a water line specifically for the FBO as an existing use, but only if we’re through this area, that is certainly a use that could be considered. Now, is the FAA in the market of funding private enterprise and upsizing a water line to facilitate a future hotel at the Yellowstone Airport? No. That is not part of that consideration. Now, if the State Department of Aeronautics, which is not flush with financial advantages, wants to upsize that pipe or if the Forest Service needs upsized facilities to facilitate their Jump Base, then that’s just an increase in material cost, really, excavating the ditch or the trench, putting the water line in the trench, if it’s not a great size increase, the cost is negligible. But if the airport complex being what serves the flying public requires an 8-inch pipe, that’s what the FAA is going to pay for is an 8-inch pipe. Expanding and providing water facilities to hotels and otherwise that are purely hypothetical at the airport is not to be considered as far as flows are concerned. The likelihood of a hotel honestly going out here is, I’ll say, probably low. The amenities between restaurants, the fact that tourists want to wander around downtown at night and otherwise are not going to be accomplished being out here based at the airport. Now, with that said, you might have an investor come in who’s really anxious and thinks this is a great business plan and wants to move forward. If that should come to fruition, then, they have to bring the proposal to MDT Aeronautics, MDT Aeronautics has to approach the FAA to remove that land from aeronautical use. That’ll require an environmental document be prepared to determine whether or not it’s even a viable entity, so there are numerous steps to go through in order to even get to approval stage of constructing such a facility. Long-winded response, but there are a lot of steps that have to come into play before something along those lines can be considered.

DB: Douglas Barton. So what you’re saying is if there is 8-inch pipe to serve the airport, if somebody did want to come and build a motel or whatever, okay, or a private entity, then and the 8-inch pipe is there, they would have to run a new line, through this same process, or…?

TE: It completely depends on what the size and use may be. I think a hotel is extreme. Putting in some small office space or if the – I’ll use rental cars as an example – granted, that’s aviation-related, but if you had a remote office out by your wash station has a bathroom in it, that use is probably minimal enough that it’s a negligible impact on the water supply, as well as the sewer. A hotel is the other extreme on that side of things. So depending on what
could be considered, you might be able to get some ancillary uses – a bathroom in an office space, a kitchenette for somebody that wants to put in a storage unit complex. Something along those lines might be possible with negligible impacts to the system. But you are correct. If somebody wants to put a hotel out here, the water line is probably not going to – we’re getting into the design analysis here – because really, the airport use is during the day… the heavy use with the flying public, there’s no night flights or otherwise, so the peak periods during the airport are during the middle of the day, peak periods on hotels are evening and morning. So, you can get into a thesis to say ‘yes, the water line is appropriate enough to server the hotel during their high peak periods, airport during its peak periods,’ but that’s got to go through a lot of approvals – the Town being one – in order to make that happen.

BS: That kind of bring a question to my mind – Brad Schmier again on the name – it’s more of an airport issue and that would be employee housing. Whether that be for SkyWest or whomever. Is that in any of your thoughts in this project.

JK: Not specifically. I mean, I’ve had lots of discussions on hypothetical things with the tenants here.

BS: Wouldn’t it be wise to think that and plan for that when it comes to infrastructure?

JK: Yeah, it would be if that was something that we were able to do. We can’t have permanent housing, though, you know, on the airport.

BS: Housing for airport-related employees, if you will.

JK: What’s that?

BS: Not for anybody else. Just your airport needs, from staffing, whether it be car rental agencies, or airline agencies. They need people.

JK: Yes, I think that would be challenging.

Diane Stilson (DS): The way the FAA sees that is if it’s necessary for – like, Life Flight – they have to have 24-hour crews. They can be manned kind of on a temporary basis on the airport, but somebody manning the rental desk needs a job for the summer and a place to stay, that kind of residential use is not allowed on airports.

BS: Even though the airport is not full season…?

DS: Right. Even though the airport is not full season. Now, somebody – Sky West comes in and they need a cot or facilities to overnight their pilots, that would be allowed. But not for the guy manning the rental desk.

TE: Yes, if Sky West based an aircraft here – basically, came in late at night, the crew stayed over, that aircraft loaded in the morning and took off, very similar to what happens at Bozeman, with the ‘remain overnight’
aircraft, that would be an acceptable situation. If you had a 24-hour FBO facility that provides maintenance and fueling 24-hours a day, that’s something that the FAA would consider as being required based on the business to be there 24-hours a day, rental cars not so much. General restaurant staff and otherwise would not be favorable to the FAA.

**BS:** Okay. So would that same rule then apply – I’m going to think car rental for the moment – seasonal – they bring an RV in for the summer and that’s what they live in, can that be done on property or not?

**DS:** No. It doesn’t seem that that would be allowed for airport use. We don’t want to fill your parking lot with RVs and campers.

**BS:** No, you would have a specific location for that, not just out there in the parking lot.

**DS:** No, residential use for the airport – unless it’s specific circumstances, as Travis gave some examples, is not allowed. Like Jeff doesn’t get to live on the airport. So….Jeff, you don’t get to live on the airport, either. We’re not going to build you a cabin on it.

**TE:** In the event someone wants to come in and develop an RV park… short term, overnight, with respect to like a hotel, it’s a similar type concept. That has to be reviewed and approved by the FAA to be even considered to remove that land from aeronautical use to put it into a situation like that. We’re getting into an area where they maybe something that’s allowable/not allowable… we’re getting into kind of a gray area. There’s got to be a lot of stars that align in order for resident – or an overnight facility, whether it be hotel, RV establishment or otherwise to base here on the airport facility

**DS:** And that’s released for non-aeronautical use, too.

**TE:** Yes, it has to be released for non-aeronautical use, before we can even begin the environmental side of things, because if the FAA says, “No, that’s not an acceptable use, we’re not going to release it,” that is dead in the water. No further activity.

**TG:** But you’re allowing camping… at the campground?

**TE:** That’s for transient pilots and transient pilots only, that’s not for general public use.

**DS:** And that’s not for long-term use, either. It’s not for somebody to camp out there for the summer.

**TG:** Okay, so they can’t fly in for a week with some of their friends or whatever they’re going to all stay out there.

**DS:** That wouldn’t be encouraged, really. That would be more – it’s overnight use…
**TE:** Typical overnight use. Now, do people stay out there longer? That may well be. That's certainly a possibility. Bozeman’s got an overnight pilot facility that they have in the back hangar area that people can set up tents and otherwise. How many days people stay there is not necessarily something that is heavily monitored at really any location that I’m aware of. So, once again, are limits pushed sometimes? Probably. In respect to the ‘hard-and-fast’ black and white definition of the FAA, there may be opportunities that the flying public takes advantage of.

**JK:** We haven’t had problems here. We maintain the campground and take out all the trash and check on the users, our staff does on a weekly basis, and it hasn’t become a problem.

**TG:** I understand more than one night. It’s more for the car companies that rent cars and some of them come in longer and I mean, they’re nice people. But when they’re saying that there’s nobody less more than overnight, it seems odd to me that they’re staying more than one night.

**JK:** Yeah, they are staying over more than one night... I didn’t know we had a limit. We’ve always sent our management around the campground as kind of just what the Forest Service does, you know. And people ask if there’s burning, if there’s no burning going on outside, then we don’t really care. I believe the limit is 15 days? Is that kind of what they’re saying in the campground? Sixteen? And I’ve never really monitored it, but through airfield inspections, the staff going through there and checking out who uses it, we’ve never had anybody here that long, so it’s never been some kind of issue that had to be addressed.

**TE:** There’s not a lot of amenities out there that make it a real comfortable stay.

**BS:** I just wanted to add one last comment: I’m excited that this is finally happening. It’s been badly needed for quite a while. Airport traffic is up, and a facility like this goes right along with that. And I’m glad to see it at this point and I hope it finishes through.

**TE:** It’s got to be done smartly. There are a lot of players at the table. Think I’ve talked to most every individual in here – there’s a few in the back that I haven’t – but there’s a lot of folks in here that have been at the table numerous times already trying to help this process move forward in a smart way. It’s got a long way to go, but this is just one step in the process and we’ll see if we can’t keep it on that – it is an aggressive timeline. There are a lot of starts that have to align. It’s not only the funding on the FAA side, it’s the funding on the Department of Transportation side, Forest Service, and otherwise that need to make this come together and the Town cooperation, whatever we can come to an agreement there, as well. So, definitely a multi-faceted government endeavor to hopefully improve things for the public on all fronts.
**Don Siefert:** Just to tack on to what Brad said, Don Siefert, Gallatin County Commission. But really, you’re right the stars are aligned now. I’d love to see all the initials after everybody – FS, the FAA, Town of West Yellowstone, I love seeing all those initials and the people come together. This is really timely because the other airports that serve Yellowstone and Teton Park are really hindered right now because Jackson, for example, sits in the middle of a Federal National Park, and the ability for them to expand is severely limited. I think the opportunity for West Yellowstone and this airport is tremendous right now as flights get more and more difficult to get in and out of Bozeman. I think the opportunity for commercial flights in and out of here is great, I think the opportunity for private flights to connect to the Madison Valley, to connect to Big Sky – that whole conglomeration up there – I think this is just a marvelous time and all the planets have aligned and I think it’s a great project. Economic development.

**TE:** I just want to say thank you all for coming out this evening, expressing your interest and speaking up. It’s important to have your options and comments documented here.

**Unknown:** Cleveland and the Jets are playing so that’s… this is more exciting than that.

**TE:** Please do take one of those written comment forms in the back. Lot of good discussion here this evening. I’m sure that’ll foster some thoughts later on. My business card is back there, Jeff’s business card is back there, please sign whichever register is fine, Jerry. And then, the comment forms, you’re welcome to take one of those home, just send me an e-mail, we can get that included, or if you want to fill one of those out handwritten and – I don’t care if you take a photo of it and text it to me, that’s fine, too. We’ll take anything. Appreciate your time this evening, appreciate the comments, great discussion… look forward to seeing you at the public hearing.

**JK:** We don’t have a date for that yet.

**TE:** There’s a lot of parts and pieces that need to come together that are out of our control. So, review processes take some time.
FYI. Nice to see.

-Jeff

-----Original Message-----
From: Ryan, Lori <lryan@mt.gov>
Sent: Wednesday, September 18, 2019 3:12 PM
To: Kadlec, Jeff <jkadlec@mt.gov>
Subject: FW: Comment on a Project or Study Submitted

-----Original Message-----
From: www@mt.gov <www@mt.gov>
Sent: Tuesday, September 17, 2019 6:44 PM
To: MDT Comments - Project <mdtcommentproject@mt.gov>
Subject: Comment on a Project or Study Submitted

A question, comment or request has been submitted via the "Contact Us" web page.

Reason for Submission: Comment on a Project or Study
Submitted: 09/17/2019 18:44:13
Project/Study Commenting On: Other Project or Activity
Name: Darren R. Holmquist
Email Address: dholmq@gmail.com
Other Details: West Yellowstone airport expansion

Comment or Question:
I live in Salt Lake City but my family is native to Montana. I got to Yellowstone a few times a year. I think the West Yellowstone airport expansion project is a great idea. Thanks.

Submitter's IP address: 73.20.64.144

Reference Number = prjcomment_853521850732253
Comments: Due to the sewer and water situation, the town of West Yellowstone is facing, and the timeline of the town and the airport expansion, I strongly urge the airport to follow their own path in regards to sewer and water rather than hoping to hook up to the West Yellowstone water and sewer system.

Name: (Optional) Jerry Johnson

Please submit your comments:
- Hand delivered to Office of the Airport Manager (West Yellowstone), or Morrison-Maierle, Inc. (Bozeman) by 5:00 p.m. MDT on September 30th, 2019
- Post marked by September 27, 2019 if mailed to Morrison-Maierle, Inc., Attn: Travis Eickman, P.E., 2880 Technology Blvd. West, Bozeman, MT 59718.
- Emailed by 5:00 p.m. MDT September 30th, 2019 to teickman@m-m.net (a confirmation reply will be sent.)

(Over for additional comments)
LIST OF PREPARERS
LIST OF PREPARERS

Morrison-Maierle, Inc., Consulting Engineers, of Bozeman, Montana was responsible for providing the environmental analysis and planning contained in this document. Staff from the Federal Aviation Administration (FAA), United States Forest Service – Custer Gallatin National Forest (USFS), and Montana Department of Transportation (MDT) – Environmental Services Bureau offered technical expertise and policy guidance during the preparation of the Environmental Assessment (EA). Additionally, the Airport Sponsor (MDT – Aeronautics Division) provided local expertise and comments for this airport development action.

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The personnel directly responsible for preparing this EA are as follows:

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LIST OF AGENCIES AND PERSONS CONSULTED
APPENDIX N

LIST OF AGENCIES AND PERSONS CONSULTED

See also Appendix M for the List of Preparers that includes other agency contacts and personnel consulted in the preparation of this document.

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REFERENCES CONSULTED
REFERENCES CONSULTED

Also reference Appendix F for the Biological Assessment Report for associated references for the Biological Resource elements of this document.

GENERAL WRITE UP


USFS NEPA Compliance, Categorical Exclusions, 36 CFR 220.6(e)(3).


Airport Layout Plan (latest approved September 16, 2005).


Environmental Assessment for Initiation of Jet Service at the Yellowstone Airport (2014).

Terminal Area Narrative Report for the Yellowstone Airport (2019).


Montana Department of Transportation Architecture & Engineering Division, Facility Seismic Evaluation & Hazard Reduction Project – Inventory Report (Seismic Inventory Report) (September, 2012).


Cultural Resource Inventory of the Yellowstone Airport Terminal and Addendum (2019).


Gallatin County Planning Department, https://gallatincomt.virtualtownhall.net/planning-community-development.