Appendix K:

4(f) Evaluation, MOA and Section 106 Consultation

United States Department of Transportation
Federal Aviation Administration

Draft

DOT Section 303(c) Evaluation
(Section 4(f) Evaluation)
for the
Bozeman Yellowstone International Airport
Gallatin County, Montana

EAXX-021-12-ARP-1756459455

February 2026

This US Department of Transportation Section 303(c) Evaluation (Section 4(f) 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:
Heidy Bruner, P.E.
Environmental Protection Specialist
Federal Aviation Administration
Helena Airports District Office
2800 Skyway Drive
Helena, MT 59602

Bozeman Yellowstone International Airport
DOT Section 4(f) Evaluation
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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 it is still commonly referred to as Section 4(f). Congress amended Section 4(f) in 2005 when it enacted the Safe, Accountable, Flexible, Efficient Transportation Act: A Legacy of Users.

> Section 4(f) prohibits the use of land of significant publicly owned public parks, recreation areas, wildlife and waterfowl refuges, and public or private historic sites that are on or eligible for the National Register of Historic Places (NRHP), for transportation projects unless the Administration determines that there is no feasible and prudent avoidance alternative and that all possible planning to minimize harm has occurred. .

The Federal Aviation Administration (FAA) is considering providing funding for proposed airport improvements at the Bozeman Yellowstone International Airport (BZN) (Airport) to increase safety and level of service at the Airport. The improvements would include lengthening and widening Runway 11-29 to accommodate larger aircraft, constructing improvements north of Runway 11-29 in the Northside General Aviation (GA) Development Area to accommodate the construction of hangars to meet user demand, and constructing ancillary projects needed to ensure safe operations, including relocating the Very High Frequency Omni-Directional Range (VOR) (24GA2322) which is eligible for inclusion on the National Register of Historic Places (NRHP).

The FAA determined that the relocation of the VOR would constitute an adverse effect under Section 106 of the National Historic Preservation Act (NHPA). The FAA consulted with the Montana Historic Preservation Officer (SHPO) pursuant to 36 CFR 800. SHPO concurred with the adverse effect determination.

This DOT Section 303(c) Section 4(f) Evaluation was prepared as an appendix to the Environmental Assessment (EA). This Evaluation consists of:

- Section 1 – Introduction: Provides the regulatory context for the evaluation and the purpose and need for the proposed project.
- Section 2 – Identification of Section 4(f) Resources: Examines the lands in the airport vicinity and identifies those resources that the FAA determined to be potentially subject to Section 4(f).
- Section 3 – Alternative Analysis: Identifies possible alternatives to avoid or minimize impacts to Section 4(f) resources.

- Section 4 – Coordination and Mitigation: Summarizes efforts made to coordinate with officials with jurisdiction of Section 4(f) Lands regarding the potential effects of the proposed projects and potential mitigation.
- Section 5 – FAA Section 4(f) Finding: Provides the FAA Section 4(f) Finding.

1.1 Section 4(f) Feasible and Prudent Requirements

Programs or projects requiring the use of 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, while the term "prudent" refers to rationale judgment. 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 4(f) protected lands.

1.2 Existing Airport Environs

Bozeman Yellowstone International Airport (BZN or Airport) is located in Gallatin County Montana near Belgrade, Montana. The Gallatin Airport Authority (Sponsor) is a public authority created, established, and empowered by the Gallatin County Commission with complete authority over the Airport.

The Airport is in the Gallatin Valley of southwest Montana. BZN serves as a commercial service airport and year-round gateway for two Yellowstone National Park entrances. It also provides access to the recreation areas of Big Sky Resort and the Bridger Bowl Ski Area as well as the business centers of Belgrade, Bozeman, Big Sky, Manhattan, Three Forks, and Livingston and higher education at Montana State University. Access to BZN is via Interstate 90 and State Highway 205, which runs east and west through the city of Belgrade, Montana.

BZN is the busiest airport in Montana with approximately 2.4 million passengers using BZN every year. BZN is served by nine airlines (several are seasonal), two cargo carriers, and seven aircraft and helicopter charter services as well as five flight schools.

The Bridger Mountains are located approximately 6.5 miles east of airport property and rise to an elevation of roughly 5,000 feet above the valley floor to 9,600 feet above mean sea level. The land directly surrounding BZN in all directions is relatively flat with an elevation of approximately 4,460 feet above mean sea level. The City of Belgrade's sewer lagoons are located near the northwest boundary of the airport on State of Montana property that is under a right-of-way deed with the airport. Soils present in the Study Area consist of loams, clay loams, clay and sandy gravels. Several gravel pits are located east and south of BZN. These are separated from the airport by the Frontage Road (S205) to the south and east and Airport Road to the east.

1.3 Proposed Action

The Airport is proposing improvements (Proposed Action) that will increase safety and level of service at the Airport. The primary elements of the Proposed Action include:

- Widening and extending Runway 11-29 to meet D-IV standards
- Constructing Northside General Aviation (GA) Development
- Constructing several ancillary projects that are needed to ensure safe operations associated with the improvements to Runway 11-29 and the Northside GA Development.

One of the ancillary improvements associated with Runway 11-29 improvements include relocating the Very High Frequency Omni-Directional Range (VOR) short range radio navigation system. This relocation will constitute an adverse effect to the VOR short range radio navigation system (24GA2322). The footprint of the extension of Runway 11-29 overlays the VOR's current location, west of the runway. The VOR is proposed for relocation to the east end of runway 12-30. When relocated, the VOR is likely to be constructed in accordance with modern standards, potentially impacting its architectural characteristics in addition to impacting its setting. The proposed project is depicted in Figure 1.

The FAA has determined and SHPO has concurred that relocation of the VOR (24GA2322) will constitute an Adverse Effect to Historic Properties. This adverse effect constitutes a "use" of the Section 4(f) resource. The adverse effect is unavoidable in order to meet the purpose and need of the project.

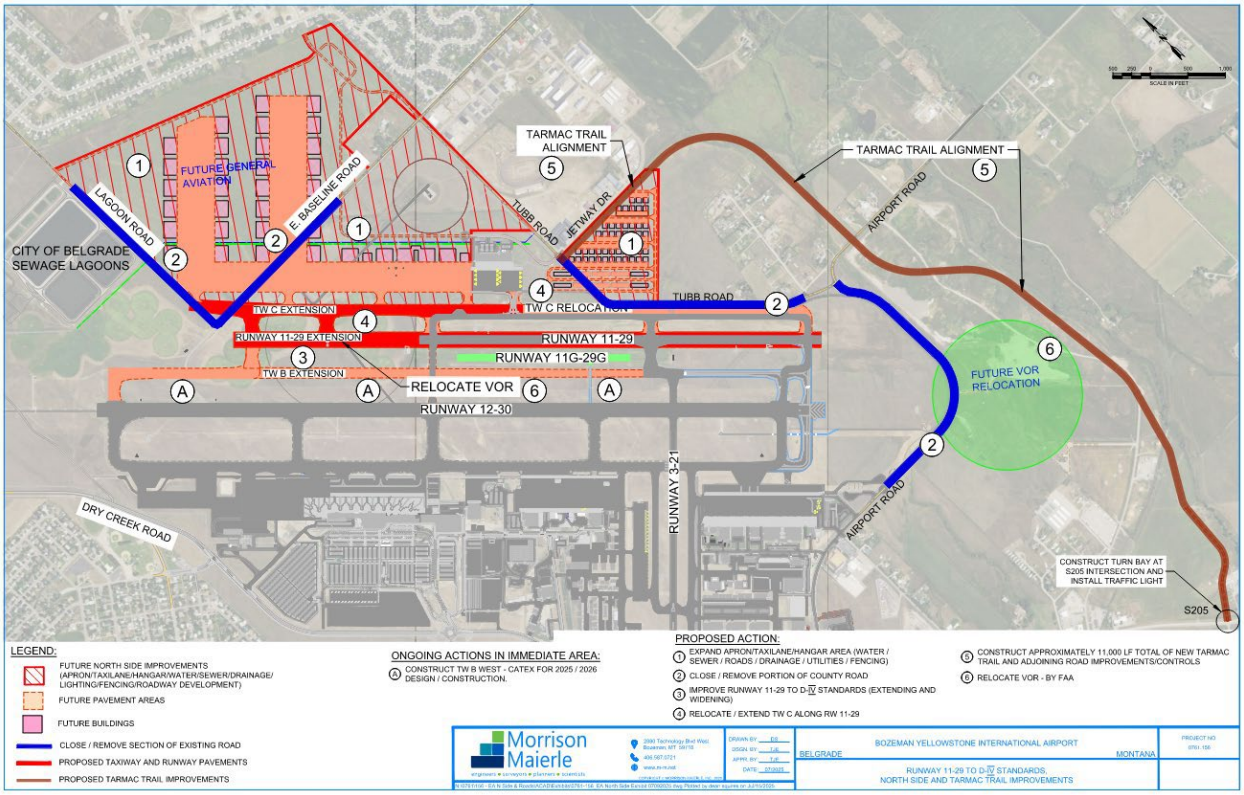


Figure 1: Proposed Action.

1.4 Purpose and Need

The purpose of the Proposed Action is to increase safety and level of service at BZN by increasing the Annual Service Volume (ASV) through improvements to Runway 11-29 to accommodate a D-IV Runway Design Code (RDC) and providing additional areas suitable for hangars to meet airport user demand.

Runway 11-29 needs to be improved to higher standards to allow for its use by a greater range of aircraft to increase the ASV at BZN. To accomplish this, Runway 11-29 needs to be widened and extended, which also requires associated improvements.

With current hangar areas built out on the south side of the Airport, there is no longer room in established areas of the Airport to build new hangars. The expansion of the Northside GA Hangar Area will expand aircraft facilities for hangar, apron, taxilane, and taxiway infrastructure that will meet demand for more hangars at the airport

2. IDENTIFICATION OF SECTION 4(F) RESOURCES

Section 4(f) of the Department of Transportation Act of 1966 protects significant publicly owned parks, recreational areas, wildlife and waterfowl refuges, and public and private

historic sites. To identify Section 4(f) resources near the study area, 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. Multiple resources protected by Section 4(f) are located on and near the Airport.

Potential 4(f) resources around BZN include several public parks in the City of Belgrade, and the Cherry River Fishing Access Site on the East Gallatin River located approximately six miles southeast of BZN. One of the public parks, Belgrade's Lewis and Clark Park, was developed with financial assistance from the Land and Water Conservation Fund (LWCF) and would fall under the requirements of Section 6(f) of the LWCF, if converted. Reference Table 1 and Figure 2 for additional details.

Table 1: Section 4(f) Parks Near the Study Area

	Resource	Location	Description
1	Children's Park	405 Bridger View Dr.: Approx. 0.7 mile southwest of the Proposed Action (runway) area	Play equipment, picnic tables, single basketball hoop
2	Clarkin Park	Corner of Madison St. and Jackrabbit Ln. Approx. 1.5 mile southwest of the Proposed Action (runway) area	Gazebo, picnic tables, benches, pavilion
3	Corbett Park	Wild Bill Way and Dillinger Rd. Approx. 1.8 mile northwest of the Proposed Action (runway) area	Play equipment, benches, picnic tables
4	Heaths Bikeway	Accessed from Sunnyside Park at 605 Stiles Ave. Approx.1.6 mile southwest of the Proposed Action (runway) area	Pathway
5	Jerry Askin Park	419 Stone River Rd. Approximately 2 miles southwest of the Proposed Action (runway) area	Pavilions, picnic benches, play equipment, sprots field, dog park, paths, pond, band shelter, seasonal bathroom
6	Kathy Hollensteiner Memorial Park	South Circle Drive Approximately 1.1 mile west of the Proposed Action (runway) area	Play equipment, climbing rock, pavilion, picnic tables, benches, seasonal restroom
7	Kiwanis Park	702 Home Run Dr. Approximately 1.1 mile west of the Proposed Action (runway) area	Play equipment, picnic table, benches, seasonal ice-skating rink with small warming shelter
8	Las Campanas Park	Access from Sunnyside Park at 605 Stiles Ave. Approximately 1.5 mile southwest of the Proposed Action (runway) area	Open Space
9	Lewis and Clark Park	200 East Central Ave. Approximately 1.0 mile southwest of the Proposed Action (runway) area	Play equipment, pavilion, picnic tables, splash pad, benches, skate park, large open space, seasonal restroom
10	Lion's Park	Intersection of Cameron St. and Weaver Rd. Approximately 0.5 mile west of the Proposed Action (runway) area	Play equipment, pavilion, picnic tables, baseball fields, batting cage, seasonal restroom
11	Mayfair Meadows	Mayfair Dr. Approximately 1.4 mile west of the Proposed Action (runway) area	Large open space
12	McMillan Park	902 Las Campanas. Approximately 1.5 mile southwest of the Proposed Action (runway) area	Play equipment, benches
13	Miller Park	1301 Wyoming. Approximately 1.6 mile southwest of the Proposed Action (runway) area	Small open space, benches
14	Peterson Park	1106 Petersen Dr. Approximately 1.6 mile west of the Proposed Action (runway) area	Small open space
15	Prarie View Park	Intersection of Arizona St. and Missoula St. Approximately 1.3 mile southwest of the Proposed Action (runway) area	Play equipment, pavilion, picnic tables, large open space, seasonal porta potty
16	Ryen Glenn Park	W. Silver Circle. Approximately 0.8 mile northeast of the Proposed Action (runway) area	Play equipment, pavilion, picnic tables, walking trails, benches, seasonal restroom
17	Senior Center Park	92 East Cameron Ave. Approximately 0.6 mile southwest of the Proposed Action (runway) area	Benches, pathway, open space, horseshoe pits

	Resource	Location	Description
18	Sunnyside Park	308 Stiles St. Approximately 1.6 mile southwest of the Proposed Action (runway) area	Single basketball hoop, large open space, swings, picnic tables
19	Triangle Park	Davis St. and Madison St. Approximately 1.25 mile southwest of the Proposed Action (runway) area	Picnic Tables
20	Western Park	1207 Cody Dr. Approximately 2 miles northwest of the Proposed Action (runway) area	Play equipment, open space
21	Winter Park	Corner N. Broadway and Park St. Approximately 1 mile southwest of the Proposed Action (runway) area	Seasonal ice-skating rink with a small warming shelter
22	Belgrade Youth Sports Complex	Spooner Rd and Mayfair Dr. Approximately 0.9 mile west of the Proposed Action (runway) area	Athletic fields

Source: City of Belgrade, MT

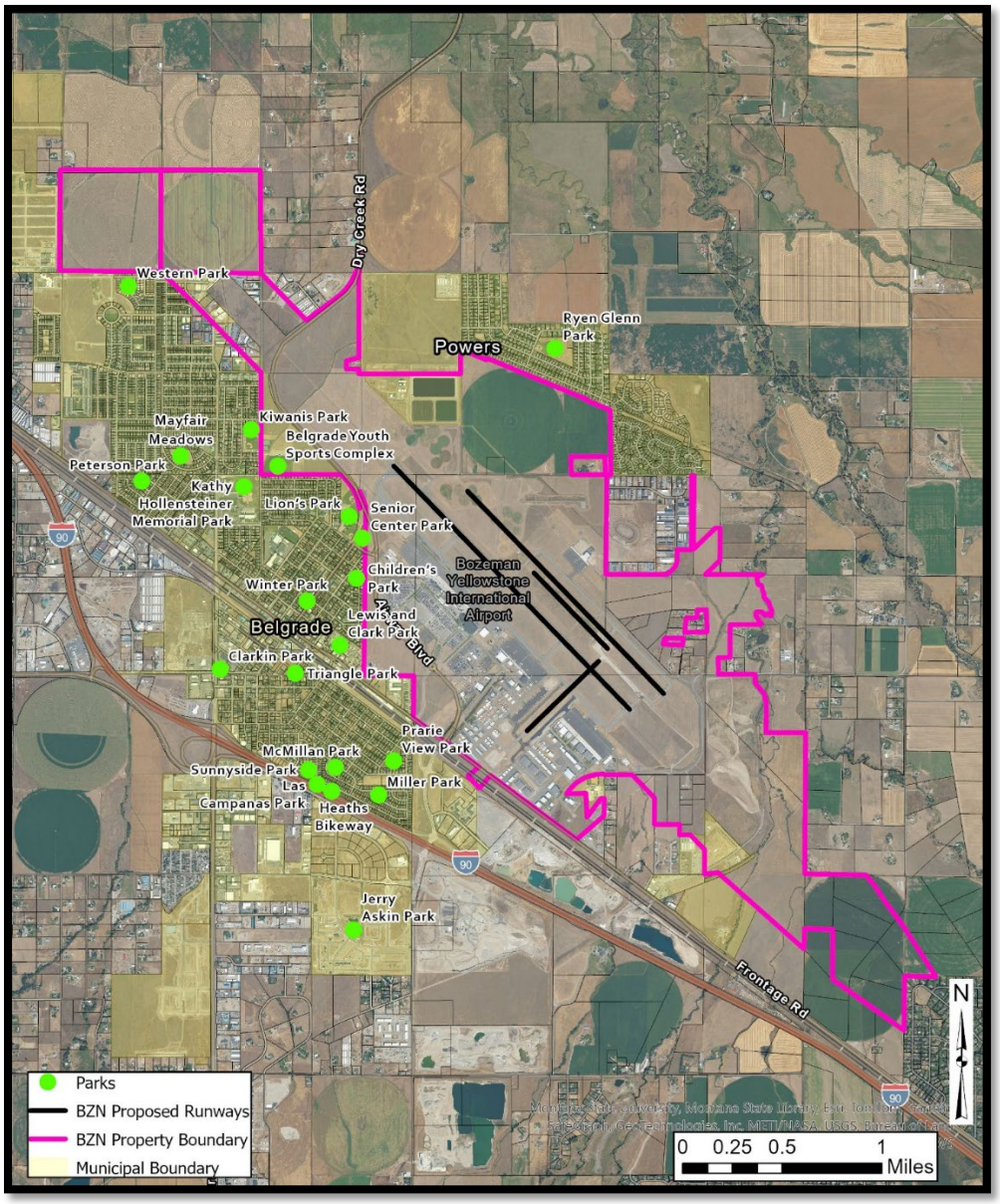


Figure 2. Existing 4(f) Parks in the Vicinity of the Airport

Section 4(f) protects historic or archeological properties that are on or eligible for inclusion on the National Register of Historic Places (NRHP). Historic sites were identified during the process required under Section 106 of the National Historic Preservation Act (NHPA). This Section 106 process is detailed in Section 4.8 of the Environmental Assessment, Historical, Architectural, Archeological and Cultural Resources. A Class III Cultural Resources Inventory (CRI) and Architectural History Survey was conducted for the Airport and coordinated with SHPO.

Results of the CRI records search indicated that there are 15 previously recorded sites present within a 1-mile radius of the project area or Area of Potential Effect (APE). The sites are tabulated in Table 2.

Table 2: Previously Recorded Sites Within a 1-mile Radius of the Project Area

Site	Site Type	NRHP Status	Relationship to Project Area
24GA1096	Historic Railroad – Northern Pacific Railroad (Low Line Spur)	Eligible	Inside
24GA0391	Historic Residence – Thomas Quaw House	NR Listed	Outside
24GA0394	Historic Homestead/Farmstead – Coscik Farmstead	Unresolved	Inside
24GA0423	Precontact Lithic Material Concentration	Unresolved	Inside
24GA0741	Historic Irrigation System – Mammoth Ditch	Ineligible	Inside
24GA0743	Historic Irrigation System – Spain Ferris Ditch	Eligible	Inside
24GA0768	Historic Industrial Development – Belgrade City Hall and Jail	NR Listed	Outside
24GA1570	Fossil Mammal	Undetermined	Outside
24GA1654	Historic Aviation – 1951 BZN Terminal Building	Eligible	Inside
24GA1901	Historic Exploration - Lewis and Clark National Historic Trail Great Falls to Three Forks	Undetermined	Outside
24GA2225	Historic Commercial Development – Town and Country Food	Ineligible	Outside
24GA2226	Historic Commercial Development – Rocky Mtn Supply	Ineligible	Outside
24GA2293	Historic Commercial Development – Gallatin Farmer's Co.	Undetermined	Outside
24GA2294	Historic Barn	Undetermined	Outside
24GA2295	Historic Residence – Gallatin Valley Milling Co., Employee Housing	Undetermined	Outside

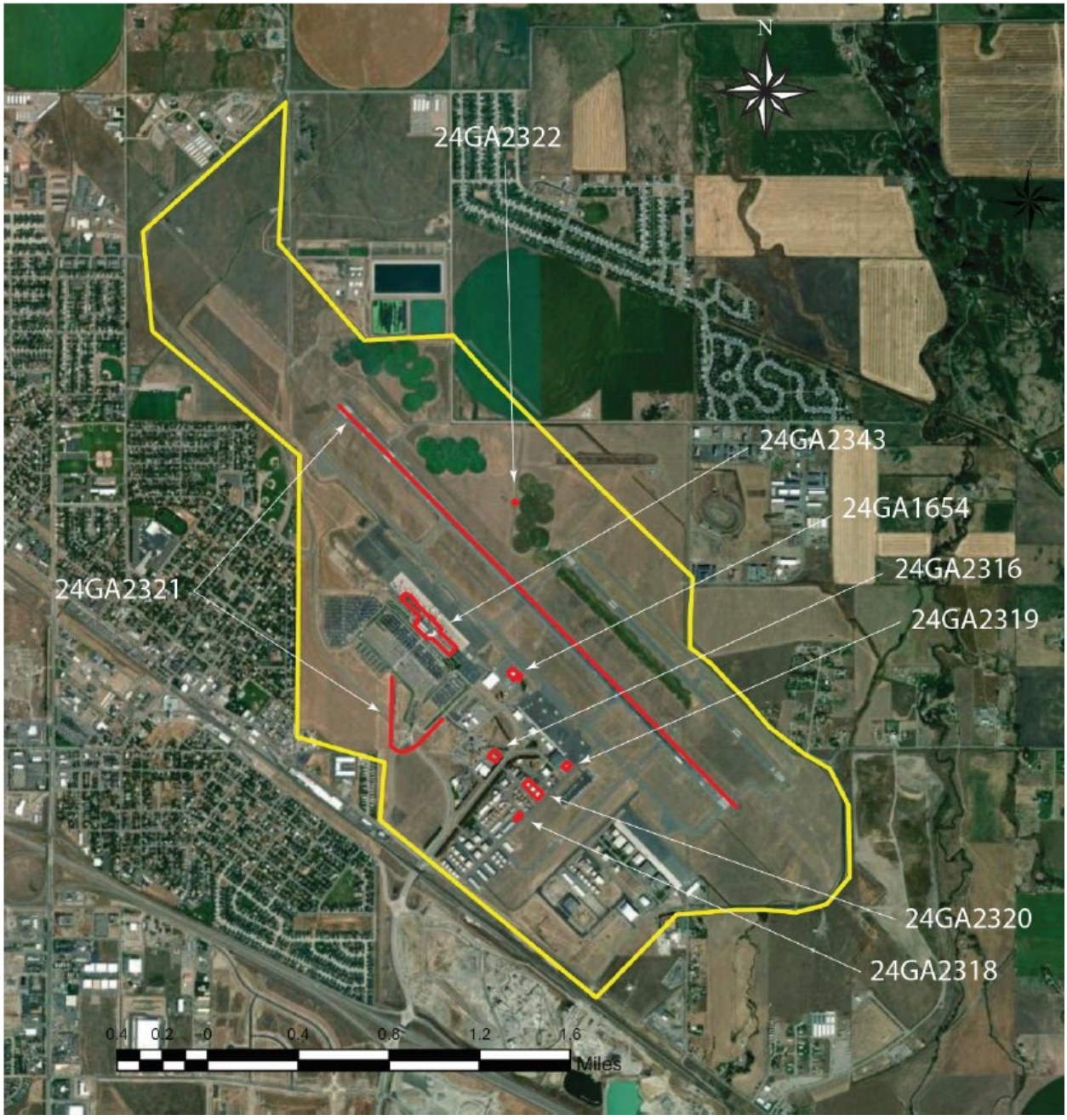
Note: Sites outside of the APE are not mapped within the CRI.
Source: Cultural Resources Inventory in Support of a Bozeman Yellowstone International Airport Environmental Assessment – Extend and Widen Runway 11-29 and Construct North General Aviation Area, Gallatin County, Montana.

Fieldwork conducted as part of the CRI identified a total of 16 cultural resources within the APE, listed in Table 3 and depicted on Figures 3 and 4.

Table 3: APE Cultural Resources with Management Recommendations

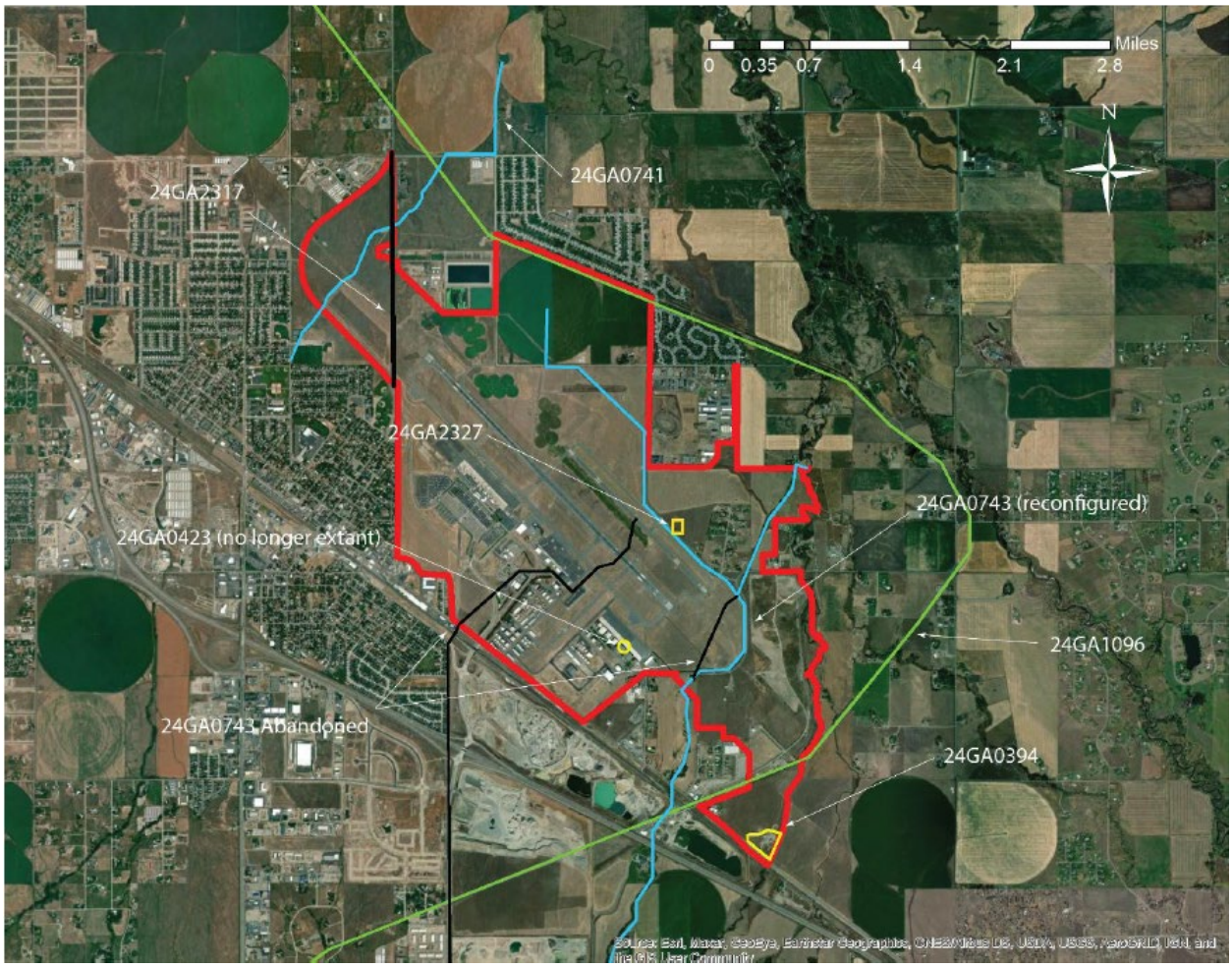
Site Number	Name/ Construction Date	Site Type	Recommended NRHP Status	Project Recommendation
BZN Historic-era Resources				
24GA2322	VOR - 1951	Historic Aviation	Eligible, Criterion A	**Avoid or Mitigate Potential Adverse Effect (HABS/HAER Photography)**
24GA1654	1951 BZN Terminal - 1951	Historic Aviation	Eligible, Criteria A, B, C	**No Adverse Effect**
24GA2321	Old Gallatin Field Taxiway and Runway - 1941	Historic Aviation	Not Eligible	**No Further Work Recommended**
24GA2319	Hangar 6 – Gallatin Flying Service – 1950s	Historic Aviation	Not Eligible	**No Further Work Recommended**
24GA2320	Hangars 8-10 – Lynch Flying Service - 1942	Historic Aviation	Not Eligible	**No Further Work Recommended**
24GA2318	GAA Hangar Building – 1970s	Historic Aviation	Not Eligible	**No Further Work Recommended**
24GA2316	National Guard Armory - 1959	Historic Military	Not Eligible	**No Further Work Recommended**
24GA2343	1977 BZN Terminal - 1977	Historic Aviation	Not Eligible	**No Further Work Recommended**
Ancillary Resources				
24GA0741	Mammoth Ditch - 1866	Historic Irrigation	Not Eligible	**No Further Work Recommended**
24GA2317	Secondary Route 290 – 1945	Historic Transportation	Not Eligible	**No Further Work Recommended**
24GA0423	Precontact Camp – Unknown date	Precontact	Not Eligible/Destroyed	**No Further Work Recommended**
24GA0743	Spain-Ferris Ditch - 1886	Historic Irrigation	Eligible - Criterion A	**Non-Contributing Segment, No Further Work Recommended**
24GA1096	Northern Pacific Low Line Spur - 1919	Historic Railroad	Eligible – Criteria A, B	**Non-Contributing Segment, No Further Work Recommended**
24GA0394	Coscik Place - 1922	Historic Farmstead	Eligible – Criteria A, C	**Not Eligible, No Further Work Recommended**
24GA2327	Heinrich Farmstead - 1914	Historic Farmstead	Not Eligible	**No Further Work Recommended**
BH-ISO-1	Lithic Material – Unknown date	Precontact Isolated Find	Not Eligible	**No Further Work Recommended**

Source: Cultural Resources Inventory in Support of a Bozeman Yellowstone International Airport Environmental Assessment – Extend and Widen Runway 11-29 and Construct North General Aviation Area, Gallatin County, Montana.



Source: Cultural Resources Inventory in Support of a Bozeman Yellowstone International Airport Environmental Assessment – Extend and Widen Runway 11-29 and Construct North General Aviation Area, Gallatin County, Montana.

Figure 3: BZN Historic-Era Resources



Source: Cultural Resources Inventory in Support of a Bozeman Yellowstone International Airport Environmental Assessment – Extend and Widen Runway 11-29 and Construct North General Aviation Area, Gallatin County, Montana.

Figure 4: BZN Ancillary Historic Resources

FAA determined and SHPO concurred that four sites within the APE are eligible for inclusion in the NRHP:

- Very High Frequency Omni-Directional Range (VOR) (24GA2322) – The VOR was originally constructed in 1951. It is eligible under Criterion A.
- 1951 BZN Terminal (24GA1654) - The old Gallatin Field Airport Terminal was built in 1950-1951. It is a vaguely "C"-shaped, two-story concrete and frame structure with a full basement. It is eligible under any Criteria A, B, and C.
- Spain-Ferris Ditch (24GA0743) – The Spain-Ferris Ditch, is considered eligible under Criterion A, but the segments of 24GA0743 located on the BZN grounds are non-contributing features given a complete loss of integrity through reconfiguration and modifications.
- 24GA1096, The Low Line Spur of the Northern Pacific Railroad (24GA1096) – The Low Line Spur is considered eligible under Criteria A and B, but the segments of 24GA1096 on the

BZN grounds are non-contributing features given a complete loss of integrity through removal and development.

3. ALTERNATIVES ANALYSIS

This section describes the methodology used for determining impacts to 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 for Determination of Section 4(f) Resource Impacts

Each 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 potential for direct impacts (physical use) and indirect impact (constructive use).

3.1.1 Direct Impacts/Physical Use

Direct impacts, or physical use, refer to physical taking/acquisition of a Section 4(f) resource for incorporation into a transportation project. A physical "use" could occur through purchase of land, certain easements, or alteration of structures or facilities on the property. In determining direct impacts, each proposed alternative was evaluated to determine if the alternative would impact one of the identified Section 4(f) resources.

3.1.2 Indirect Impacts/Constructive Use

Use within the context of Section 4(f) includes not only actual physical taking of such resources, but also indirect impacts. Indirect impacts could rise to the level of a constructive "use" when a project that does not physically use the land of a protected resource dissipates the resource's value through another means such as noise, air pollution, water pollution, or other impact. Constructive "use" occurs when the impacts of a project on a Section 4(f) property are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired.

3.2 Section 4(f) Feasible and Prudent Requirements

Programs or projects requiring the use of 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. According to FAA Order 5050.4B the term "feasible" refers to sound engineering principals, while the term "prudent" refers to rationale judgment. As such, 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?

3.3 ALTERNATIVES

Alternatives were derived from the 2020 Airport Master Plan, which identified proposed improvements to Runway 11-29 to raise the ASV at the airport and the construction of the Northside GA Area to meet hangar demand. Each proposed alternative was evaluated to determine if the alternative would directly/indirectly impact a Section 4(f) resource.

The Master Plan and the Master Plan Addendum considered and evaluated various development alternatives. The only alternative evaluated in these documents that avoids impacts to Section 4(f) resources is the No Action Alternative. Additional alternatives that potentially avoid impacts to Section 4(f) resources were evaluated. These alternatives, in addition to the No Action Alternative and Proposed Action Alternative from the EA, are described below.

3.3.1 No Action Alternative

The No Action Alternative would not impact the identified Section 4(f) resources. However, the No Action Alternative would not address the purpose and need of the project. As such, the No Action Alternative was found not to be feasible or prudent and was not considered further.

3.3.2 Section 4(f) Alternative 1 – Proposed Action: Widen and Extend Runway 11-29, Including Relocation of the VOR

This alternative widens and extends Runway 11-29 to meet D-IV standards, constructs the Northside GA Development, and constructs several ancillary projects that are needed to ensure safe operations associated with the improvements to Runway 11-29 and the Northside GA Development.

One of the ancillary improvements associated with Runway 11-29 improvements include relocating the VOR short range radio navigation system. This relocation will constitute an adverse effect to the VOR (24GA2322). The footprint of the extension of Runway 11-29 overlays the VOR's current location, west of the runway. The VOR is proposed for relocation

to the east end of runway 12-30. When relocated, the VOR is likely to be constructed in accordance with modern standards, potentially impacting its architectural characteristics in addition to impacting its setting. This alternative would have direct impact to a Section 4(f) resource but was found to be the only feasible and prudent alternative that fully meets the purpose and need. This alternative is proposed as the Proposed Action.

3.3.3 Section 4(f) Alternative 2: Build a New Commercial Airport in the Area.

This potential alternative could meet the purpose and need by providing an alternative for air traffic that would normally fly into BZN thereby reducing operations at the airport and would also provide more hangar space. However, building a new airport in the area is cost-prohibitive and there is no potential sponsor interested in constructing and operating a new commercial airport in the area. This is not a feasible option.

3.3.4 Section 4(f) Alternative 3: Restrict Operations at the Airport

This alternative would involve BZN directing users not to use the airport or restricting airport use during peak times. As BZN is a public use airport that receives funding from the FAA, BZN is not authorized to restrict operations. This is not a feasible option.

3.3.5 Section 4(f) Alternative 4: Construct New Runways at the Airport

This alternative would involve constructing new runway(s) that would not require relocation of the VOR. However, BZN is surrounded by development and does not have the necessary space on airport property to build a new runway with the needed separation distance from the other two runways that could contribute to an increase in ASV. This option is not feasible.

3.3.6 Section 4(f) Alternative 5: Reduce Challenges to Approaches and Departures to Allow Increased Usage of Runway Ends

Current challenges to approaches and departures at BZN largely involve terrain limiting use of the Runway 30 end, thereby increasing use of the Runway 12 end for both approaches and departures. This alternative would involve removing the limiting terrain from the approach or departure surfaces of the Runway 30 end at BZN. However, it is not financially or physically reasonable to remove the limiting terrain from the approach or departure surfaces of the Runway 30 end at BZN. This option is not feasible.

3.4 Section 4(f)Resources Impacts and Measures to Minimize Harm

The Very High Frequency Omni-Directional Range (VOR) (24GA2322) is a type of radio navigation system that allows aircraft to determine their bearing from a ground station. Radio beacons emit very high frequency radio waves that are received by aircraft. The range for signals is approximately 200 miles.

This VOR was originally constructed in 1951. Its cone sits on an approximately 40-foot (ft) diameter circle with a square metal sided building below. There are two separate entry doors on the south elevation. There are no windows. The cone was upgraded in the mid 1980's. The mid-1980s cone upgrade does not diminish the site's integrity and is consistent with general facility maintenance.

The VOR is eligible for inclusion in the NRHP under Criterion A for its association with early commercial air travel. The site retains good integrity having retained its original position and function. The VOR was placed at Gallatin Field at the beginning of the timeframe (early 1950s) that they were available to public airports, allowing an important technology to the then-blossoming commercial air travel at Gallatin Field.

3.4.1 Direct Impacts

The necessary extension of Runway 11-29 will put the VOR in the footprint of the runway. As a result, the Airport is required to construct a new VOR structure in another location following FAA Order 6820.10 VOR, VOR/DME, and VORTAC Siting Criteria and also meet FAA maintenance and operations requirements (14 CFR 171.11). The impact to the VOR will constitute an Adverse Effect to Historic Properties under Section 106; and therefore, will result in a "physical use" of a Section 4(f) resource.

3.4.2 Indirect Impacts/Constructive Use

No indirect effects would be expected.

3.4.3 Proposed Mitigation

The Airport Sponsor will design, manufacture, and install an interpretive sign for the VOR. The interpretive sign will be displayed in a public area of the BZN Terminal. Additionally, the Airport Sponsor will produce a Level II HABS/HAER Report for submittal to National Park Service (NPS).

4. COORDINATION

The FAA and Airport Sponsor implemented a public involvement and agency coordination program for the Proposed Project to gather input and discuss potential impacts.

The FAA invited the Blackfeet Nation, Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Fort Peck Assiniboine and Sioux Tribes, the Nez Perce Tribe, and the Shoshone-Bannock Tribes of the Fort Hall Reservation to provide information to the survey that the FAA should consider and to participate in government-to-government consultation for the proposed improvements. The letters were dated May 14, 2025. No comments have been received regarding the presence of cultural or religious significance.

Correspondence was exchanged between the staff of the FAA, the SHPO, and the Airport. The SHPO concurred with the determination of the Area of Potential Effect, eligibility determinations, effect determinations, and proposed mitigation for the project as outlined in the MOA.

On November 3, 2025, FAA submitted Electronic Section 106 Documentation Submittal System (e106) Form notifying the Advisory Council on Historic Preservation (ACHP) of the finding that the proposed project may adversely affect historic properties and inviting ACHP to participate in a Section 106 consultation. On November 19, 2025, ACHP responded acknowledging that ACHP did not respond within the 15-day window and reminding FAA of the need to file the Section 106 MOA with the ACHP at the conclusion of the consultation process.

The draft Section 4(f) Evaluation was also put out for 30-day public review and comment period. The availability of the document was announced via a robust social media campaign coordinated by Big Sky Public Relations through Facebook, Instagram, and local news media outlets. The document was made available via the Bozeman Yellowstone International Airport website and comments were received and considered. Appropriate edits were incorporated into this Final 4(f) Evaluation.

Attachment 1 contains associated written correspondence, the press release and public notice, findings, and the MOA.

5. FINDING

After careful and thorough consideration, the FAA determined that there are no feasible and prudent alternatives to the use of a Section 4(f) resource. As demonstrated in Section 3.3 of this evaluation, other alternatives considered would either fail to meet the purpose and need or result in extraordinary financial and social impacts. The Proposed Action includes mitigation including design, manufacture, and installation of an interpretive sign for the VOR in the public area of the BZN Terminal.

Based upon the above considerations, there is no feasible and prudent alternative to the use of the VOR and the Proposed Action includes all possible planning to minimize harm resulting from such use.

Memorandum of Agreement

among the

Federal Aviation Administration,
Gallatin Airport Authority, and
Montana State Historic Preservation Office

regarding the

Proposed Improvements at the Bozeman Yellowstone International Airport (BZN)
Gallatin County, Montana

Unique Identification Number: EAXX-021-12-ARP-1756459455

WHEREAS the Federal Aviation Administration (FAA) is considering funding for the proposed airport improvements (undertaking) at the Bozeman Yellowstone International Airport (BZN) (the Airport), owned and sponsored by the Gallatin Airport Authority (Airport Sponsor), near Belgrade in Gallatin County, Montana, pursuant to 49 USC § 47107(a)(16), FAA Order 5100.38D, *Airport Improvement Program Handbook*; and

WHEREAS the undertaking consists of extending and widening the existing Runway 11-29, constructing the Northside General Aviation Development, and constructing ancillary projects needed to ensure safe operations, including relocating the Very High Frequency Omni-Directional Range (VOR), as depicted 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 FAA has defined the undertaking's area of potential effect (APE), as defined at 36 CFR Part 800.16(d), as shown on the layout provided in Appendix A; and

WHEREAS, the FAA has determined that the undertaking will have an adverse effect on the Very High Frequency Omni-Directional Range (VOR) (24GA2322), which is eligible for listing on the National Register of Historic Places (NRHP) under Criterion A; and

WHEREAS, 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 Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Fort Peck Assiniboine and Sioux Tribes, the Nez Perce Tribe, and the Shoshone-Bannock Tribes of the Fort Hall Reservation 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 regarding government-to-government consultation; and

WHEREAS, the FAA received no substantive comments from the Tribes; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), on November 3rd, 2025, the FAA notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation regarding the Very High Frequency Omni-Directional Range (VOR) (24GA2322) and on November 19th, 2025, the ACHP chose 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. Very High Frequency Omni-Directional Range (VOR) (24GA2322))

1. The Airport Sponsor will design, manufacture, and install an interpretive display in a public area of the terminal building to provide picture(s) of the VOR, and explain its use and history in the development of the Airport.
2. The FAA and SHPO will be provided the opportunity to review

and comment on the details of the interpretive display and the text and design of the interpretive sign. FAA and SHPO will have 30 days to review any drafts once received.

3. Installation is to be completed by January 1, 2030. This stipulation will be considered complete upon written notification to SHPO that the display has been installed.
4. The Airport Sponsor will conduct an Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) level II documentation of the VOR for submission to the National Park Service (NPS). This is proposed to be completed by January 1, 2028. The FAA and SHPO will also be provided copies of this documentation.

II. PROFESSIONAL QUALIFICATIONS

A. Professional Qualifications
   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 reports, interpretive displays, 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 issuance of the associated grant until this MOA expires or is terminated, the Airport Sponsor 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 Airport Sponsor'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) and/or the Infrastructure

Investment and Jobs Act, which are 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 IIJA) 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 a final report to the SHPO detailing the steps taken to meet the terms of the MOA.

IV. UNANTICIPATED DISCOVERIES AND EFFECTS

A. A Plan for Discovery of Unanticipated Cultural Resources can be found in Appendix B of this MOA. If 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 terms of this Plan will be followed.
B. Design and initiation of data recovery or other mitigation measures will be implemented as expeditiously as possible. If data recovery is deemed necessary, it will be based upon a Data Recovery Plan developed in consultation with the SHPO. In the event a dispute arises with regard to appropriate mitigation measures, the FAA will consult with the ACHP in accordance with Stipulation VII to resolve the issue.

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).

VI. DURATION

This MOA will be null and void if its terms are not carried out within five (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 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-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.

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:

FEDERAL AVIATION ADMINISTRATION

_____Date:_____
Jason Garwood, Acting Manager
Helena Airports District Office

MONTANA STATE HISTORIC PRESERVATION OFFICE

_____Date:_____
Pete Brown
State Historic Preservation Officer

GALLATIN AIRPORT AUTHORITY

_____Date:_____
Carl Lehrkind, IV
Chairman

APPENDIX A

to the

Memorandum of Agreement

regarding the

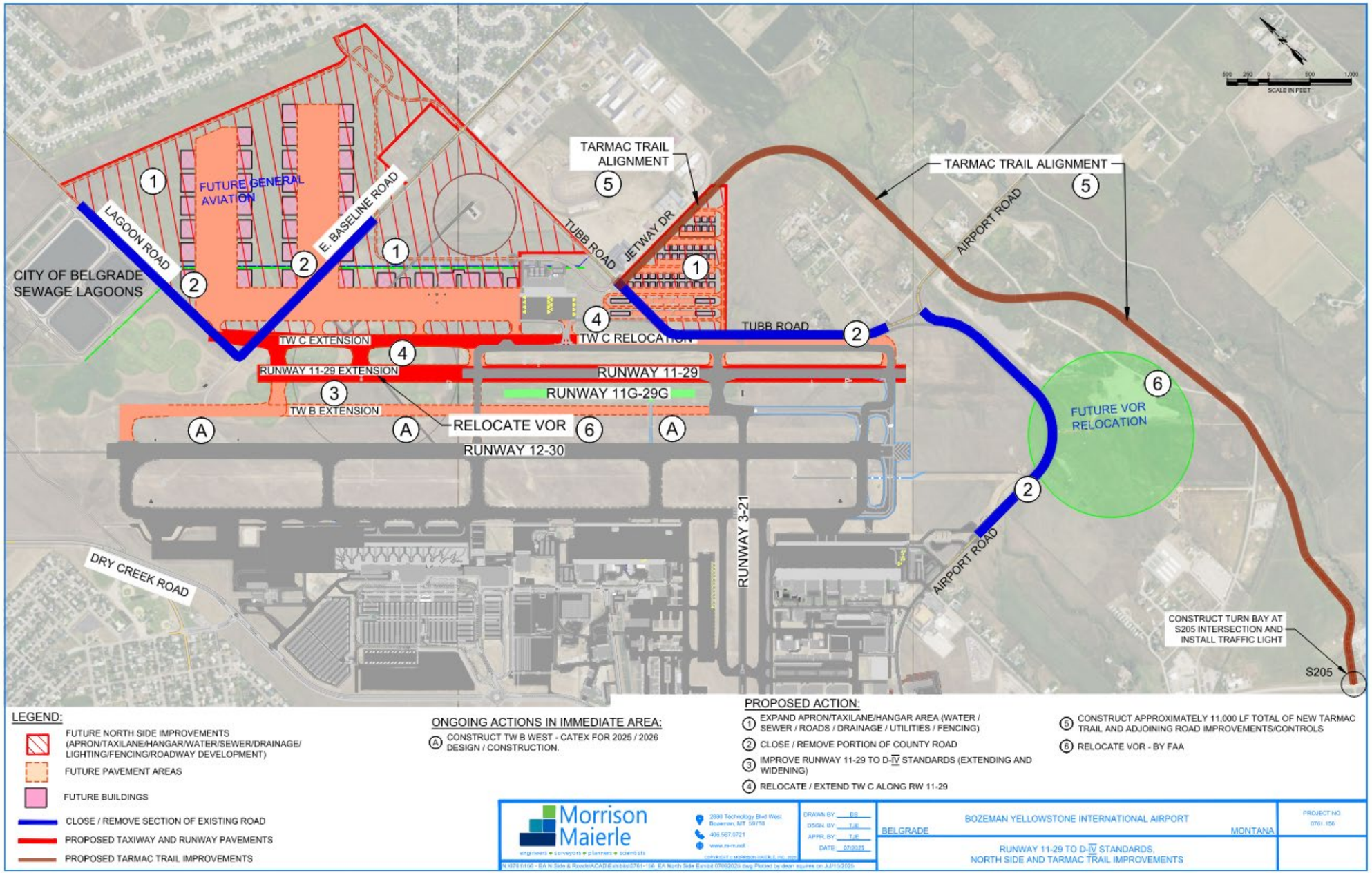
Proposed Improvements at the
Bozeman Yellowstone International Airport (BZN)
Gallatin County, Montana

Proposed Action

and

Area of Potential Effect (APE)

Proposed Action



LEGEND:

- FUTURE NORTH SIDE IMPROVEMENTS (APRON/TAXILANE/HANGAR/WATER/SEWER/DRAINAGE/ LIGHTING/FENCING/ROADWAY DEVELOPMENT)
- FUTURE PAVEMENT AREAS
- FUTURE BUILDINGS
- CLOSE / REMOVE SECTION OF EXISTING ROAD
- PROPOSED TAXIWAY AND RUNWAY PAVEMENTS
- PROPOSED TARMAC TRAIL IMPROVEMENTS

ONGOING ACTIONS IN IMMEDIATE AREA:

(A) CONSTRUCT TW B WEST - CATEX FOR 2025 / 2026 DESIGN / CONSTRUCTION.

PROPOSED ACTION:

1. EXPAND APRON/TAXILANE/HANGAR AREA (WATER / SEWER / ROADS / DRAINAGE / UTILITIES / FENCING)
2. CLOSE / REMOVE PORTION OF COUNTY ROAD
3. IMPROVE RUNWAY 11-29 TO D-IV STANDARDS (EXTENDING AND WIDENING)
4. RELOCATE / EXTEND TW C ALONG RW 11-29
5. CONSTRUCT APPROXIMATELY 11,000 LF TOTAL OF NEW TARMAC TRAIL AND ADJOINING ROAD IMPROVEMENTS/CONTROLS
6. RELOCATE VOR - BY FAA

Morrison Maierle
engineers • surveyors • planners • scientists
2880 Technology Blvd West
Bozeman, MT 59718
406.587.0721
www.m-m.net

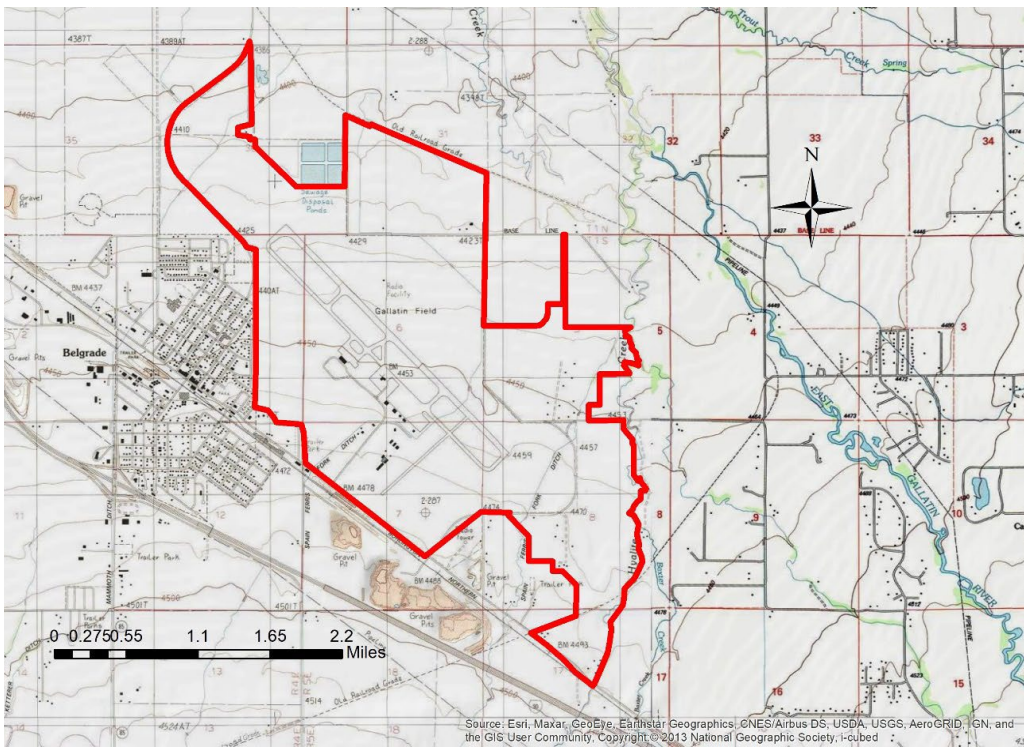
DRAWN BY: DS
DSGN BY: TJE
APPR BY: TJE
DATE: 07/2025

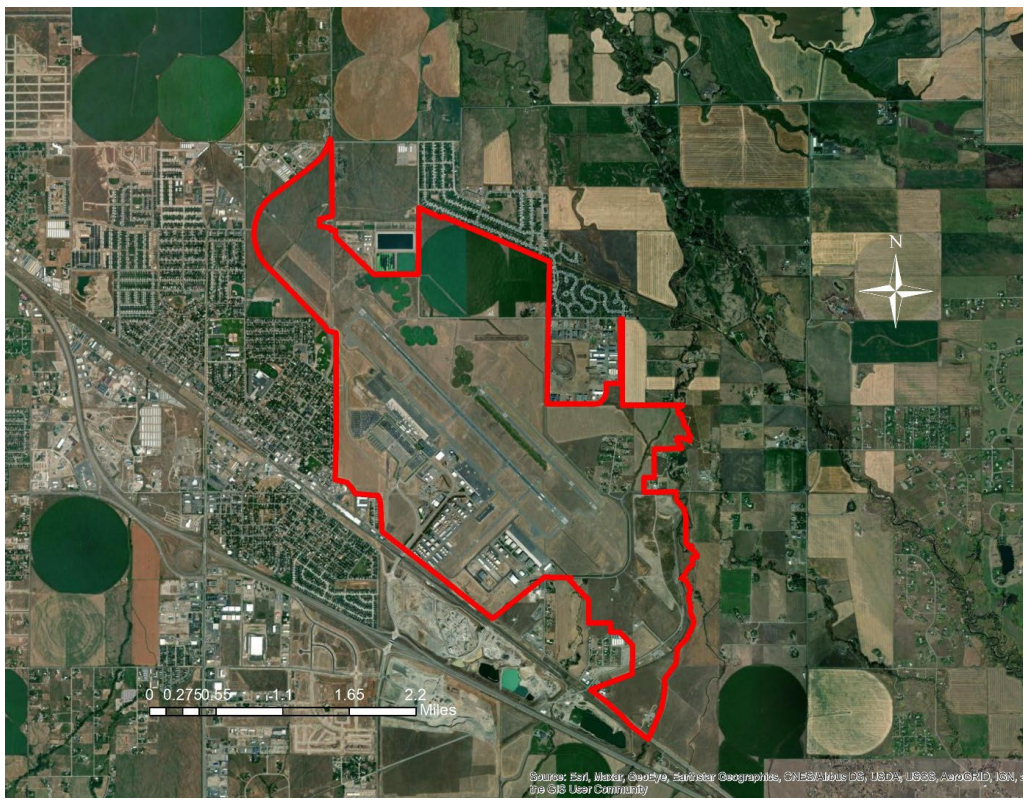
BOZEMAN YELLOWSTONE INTERNATIONAL AIRPORT
BELGRADE MONTANA

RUNWAY 11-29 TO D-IV STANDARDS, NORTH SIDE AND TARMAC TRAIL IMPROVEMENTS

PROJECT NO 0761.156

Area of Potential Effect (APE)





APPENDIX B

to the

Memorandum of Agreement

regarding the

Proposed Improvements at the
Bozeman Yellowstone International Airport (BZN)
Gallatin County, Montana

Plan for Discovery of Unanticipated Cultural Resources

Cultural resources can be found during any ground-disturbing activity. If a monitor is onsite, 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

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 the Airport Sponsor will be notified immediately (within 24 hours), and the FAA will notify 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, Airport Sponsor, and the 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 Airport Sponsor, SHPO, 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 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 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 SHPO.

9. Points of Contact:
    FAA: HLN ADO: (406) 441-5409
    Airport Sponsor, Carl Lehrkind, IV, Gallatin Airport Authority Chair: (406) 388-8321
    SHPO: (406) 444-7715

MONTANA
HISTORICAL SOCIETY

October 8, 2025

Ms. Heidy Bruner
FAA – Helena Airports District Office
2800 Skyway Drive, Suite E2
Helena, MT 59602

Re: Bozeman Yellowstone International Airport (BZN) Proposed Improvements

Dear Ms. Bruner,

Thank you for your letter and associated materials (received July 21, 2025) and additional information (received August 21 and September 10, 2025) regarding the proposed Bozeman Yellowstone International Improvement Project in Gallatin County. We concur with the following eligibility determinations:

24GA2357 – Not Eligible	24GA2322 – Eligible (A)	24GA2321 – Not Eligible
24GA2319 – Not Eligible	24GA2320 – Not Eligible	24GA2318 – Not Eligible
24GA2316 – Not Eligible	24GA2343 – Not Eligible	24GA2317 – Not Eligible
24GA0423 – Not Eligible	24GA0394 – Not Eligible	24GA2327 – Not Eligible

We agree that site 24GA1654 continues to be Eligible and site 24GA0741 continues to be Not Eligible.

We also concur with your determination of Adverse Effects to Historic Properties, specifically site 24GA2322. We look forward to working with your office in the development of a Memorandum of Understanding to mitigate the adverse effects of this undertaking.

Please note that our concurrence does not substitute for a good faith effort to consult with interested parties, local government authorities, and American Indian tribes. If you receive a comment that substantially relates to a historic property located within or adjacent to the Area of Potential Effect, please submit it to our office for review. Include documentation of how the comment was addressed. If you have any questions or concerns, do not hesitate to contact me at (406) 444-6485 or Samantha.McGowen@MT.gov. Thank you for consulting with us.

Sincerely,

Samantha McGowen

Samantha McGowen, M.S.
Compliance Officer
Montana State Historic Preservation Office

FILE: FAA – 2025 – 20250910003

U. S. Department
of Transportation

Federal Aviation
Administration

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

July 21, 2025

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

Subject: Determination of Eligibility and Effect due to Proposed Improvements at the Bozeman Yellowstone International Airport (BZN) near Belgrade, Montana

Dear Mr. Brown:

The Federal Aviation Administration (FAA) is examining potential environmental impacts associated with proposed improvements (undertaking) at the Bozeman Yellowstone International Airport (BZN) near Belgrade, Montana. BZN is the busiest airport in Montana with approximately 2.4 million passengers using BZN every year. BZN is proposing airport improvements to increase safety and level of service at BZN and to provide additional areas suitable for hangars to meet airport user demand. A project description and project layouts are included with this letter.

The proposed improvements and 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 has initiated preparation of an Environmental Assessment (EA) to meet its NEPA obligations and intends to complete Section 106 in conjunction with the NEPA process.

The *Cultural Resources Inventory in Support of a Bozeman Yellowstone International Airport Environmental Assessment – Extend and Widen Runway 11-29 and Construct North General Aviation Area, Gallatin County, Montana* (CRI) was completed in January 2025. This

document was prepared to identify potentially eligible historic resources and evaluate potential impacts due to the undertaking.

The Area of Potential Effect (APE) includes approximately 4,700 acres of airport property on which the undertaking will be constructed. The APE is included with this letter. The CRI provides a complete architectural evaluation and history of BZN, its buildings, structures, and grounds. The CRI also evaluates the potential for a BZN Historic District.

Fieldwork was conducted to Class III inventory standards in several field sessions in October 2023. A total of 16 resources were identified, including 11 historic-era architectural sites, two historic-era irrigation resources, one historic-era road alignment, one prehistoric site, and one prehistoric isolate. The CRI recommended that 12 of these resources are not eligible for inclusion in the National Register of Historic Places (NRHP) and that no further work is necessary. Four sites are recommended as eligible for inclusion in the NRHP: 1951 BZN Terminal (24GA1654), VOR (24GA2322), the Spain-Ferris Ditch (24GA0743), and the Low Line Spur of the Northern Pacific (24GA1096). However, the latter two resources are recommended in the CRI as having non-contributing segments within the APE.

The FAA has considered and agrees with the recommendations of eligibility made in the CRI. The FAA has made a determination of eligibility and individually discusses the 16 potentially eligible historic resources below.

BZN Historic-era Resources

24GA2357 (Bozeman Yellowstone International Airport)

- 24GA2357, Bozeman Yellowstone International Airport, as a whole, is *not eligible* for listing in the NRHP under any Criteria.
- The Airport at its present site was opened in 1942 as Gallatin Field.
- BZN possesses few remaining historic structures with 133 of the 137 structures present in the General Aviation (GA) portion of BZN having been built in the modern era. The entirety of the east apron and associated buildings were built in the mid 2000's, with hangar construction still underway. Hangars south of Taxiway M were built in the late 1990's to early 2000's. Of the 25 structures present on the Commercial Aviation area of BZN all but two (the 1951 BZN Terminal [24GA1654] and the 1977 BZN Terminal [24GA2343]) are of the modern era. The runways/taxiways/aprons (24GA2321) have all been updated in the modern era as well will numerous extensions. A modern radar interrogator beacon was built in 2006 and a new flight school is currently being constructed on what will be the North Apron.

- The airport is significant for its association with early aviation in the region; however, as an historic district (24GA2357), it lacks sufficient integrity to be considered eligible under Criterion A.
- The airport is associated with Fred Willson, a noted Bozeman architect. However, the only building or structure that clearly dates from the period of his involvement is the 1951 BZN Terminal (24GA1654), which is eligible for the NRHP individually for his design (discussed below). As such, the airport as a historic district (24GA2357), is not eligible under Criterion B.
- The airport lacks buildings or structures that are representative of a particular type, period (with the exception of the VOR [24GA2322]), or method of construction. Nor do they represent unique engineering or architecture, with the exception of the 1951 BZN Terminal (24GA1654). As such, the airport as a historic district (24GA2357), is recommended not eligible under Criterion C.
- The airport lacks potential to address future historic research issues as it pertains to the history of aviation in the region or at a local level, and as a historic district (24GA2357), is not eligible for inclusion in the national register under Criterion D.
- Overall, BZN retains fair integrity of location and some integrity of design for its expression as a public airport. However, as a historic district, the Airport is not eligible due to a loss of integrity as a result of the cumulative effect of the series of late-twentieth and early twenty-first century changes.

24GA2322 (Very High Frequency Omni-Directional Range)

- 24GA2322, Very High Frequency Omni-Directional Range (VOR), is *eligible* for listing in the NRHP under Criterion A
- The VOR was originally constructed in 1951.
- Its cone sits on an approximately 40-foot (ft) diameter circle with a square metal sided building below. There are two separate entry doors on the south elevation. There are no windows. The cone was upgraded in the mid 1980's.
- The CRI recommends the VOR is eligible for inclusion in the NRHP under Criterion A for its association with early commercial air travel. The site retains good integrity having retained its original position and function. The VOR was placed at Gallatin Field at the beginning of the timeframe (early 1950s) that they were available to public airports, allowing an important technology to the then blossoming commercial air travel at Gallatin Field. The mid-1980s cone upgrade does not diminish the site's integrity and is consistent with general facility maintenance.

24GA1654 (1951 BZN Terminal)

- 24GA1654, 1951 BZN Terminal, is *eligible* for listing in the NRHP under any Criteria A, B, and C
- The old Gallatin Field Airport Terminal was built in 1950-1951. It is a vaguely "C"-shaped, two-story concrete and frame structure with a full basement.
- The site was first recorded in 2004 and was initially recommended as not eligible for inclusion in the NRHP. SHPO disagreed and recommended that the site was eligible under Criterion A, B, and C. The FAA agreed.
- It currently houses Aircraft Rescue and Fire Fighting (ARFF) operations and U.S. Customs. The AARF facility was built adjacent to the terminal in 2004. Additional 2004 modifications include removing the main entry doors that were added in the 1980s to expose the original columns and leaving the entry doors in their original location. The current inventory found the site to have changed little from the 2004 recordation, with the exception of the now complete AARF station/addition.
- The FAA has worked with SHPO for further addition to the AARF facility without adversely affecting the 1951 BZN Terminal.

24GA2321 (BZN Runway/Taxiway/Apron System)

- 24PGA2321, BZN Runway/Taxiway/Apron System, is *not eligible* for listing in the NRHP under any Criteria.
- BZN was constructed circa 1941 with Runway 12-30, Runway 16-34, turf crosswind Runway 3-21, Taxiway A, and Taxiway B. Runway 12-30 and Taxiway A have been significantly modified and improved over the years, while Runway 16-34 and Taxiway B exists as remnants only. The original turf crosswind Runway 3-21 no longer exists as it was relocated in the 1970s in anticipation of the construction of the 1977 terminal. Runway 3-21 is now paved in a different location. Taxiways C and D were constructed in 1965, and Runway 11-29 was constructed circa 2017.
- The runway/taxiway/apron system (24GA2321) is significant for its association with early aviation in the region, however; it lacks sufficient integrity to be considered eligible under Criterion A. Further, the system is not associated with persons significant to the past, as such, not eligible under Criterion B. The runway/taxiway/apron system lacks components that are representative of a particular type, period, or method of construction. Nor do they represent unique engineering or architecture. As such, the system, is recommended not eligible under Criterion C. The system lacks potential to address historic research issues as it pertains to the history of aviation in the region or at a local level, and is not eligible for inclusion in the national register under Criterion D.
- The site suffers from a lack in integrity, possessing the element of location only. Both Runway 16-34 and Taxiway B were abandoned in 1972 and have since been enveloped in modern construction and layout of the current BZN configuration. The

1941 alignment of turf crosswind Runway 3-21 no longer exists as the runway was relocated in the 1970s in anticipation of the construction of the 1977 terminal. While Runway 12-30 has a bearing that reflects the original bearing of the 1940s construction, the runway has been altered from its original length position which compromises its integrity of setting.

24GA2319 (Hangar 6 – Gallatin Flying Service)

- 24GA2319, Hangar 6 – Gallatin Flying Service, is *not eligible* for listing in the NRHP under any criteria.
- The Gallatin Flying Service hangar is a cinder block hangar constructed in 1950, and held a position on the western extend of the 1950s front line, just to the right of the administration Quonset that was present at that time.
- The hangar was moved to the easternmost extent of the current front line in 1974 as part of the expansion of the General Aviation (GA) Apron and is now home to Million Air, a private flight service.
- The hangar has several additions to the original layout and numerous modifications. The southwest elevation has a bifold hangar door. It is unclear if this is the original hangar opening with a new door, which would indicate the hangar had apron/taxiway orientation reversed when it was moved in 1974. The southeast addition has corrugated metal flashing to its shed roof line while the barrel roof of the hangar itself is also corrugated metal. Wood soffit below the roof line is also an addition with the possibility that the entire roofline has been raised two courses to accommodate the bifold hangar door.
- Hangar 6 is significant for its association with early aviation in the region, particularly the Gallatin Flying Service, however; it lacks sufficient integrity to be considered eligible under Criterion A. While generally associated with Don Wright and the Stradley family, important persons in the history of local aviation, modifications and the relocation of the hangar have greatly impacted its integrity. As such, the hangar is not eligible under Criterion B. The hangar lacks components that are representative of a particular type, period, or method of construction. Nor do they represent unique engineering or architecture. As such, it is recommended not eligible under Criterion C. The hangar also lacks potential to address historic research issues as it pertains to the history of aviation in the region or at a local level, and is not eligible for inclusion in the national register under Criterion D.
- The hangar has been moved from its original location and while still on the front line of hangars, has reversed its hangar door and has been modified with an addition. While the new location is historically appropriate, it has nonetheless affected the hangar's integrity of setting. Similarly, its integrity of location was affected by the move and remodeling and reconfiguration of the hangar have affected its historic integrity of materials, design, workmanship, feeling, and association.

24GA2320 (Hangars 8-10, Lynch Flying Service)

- 24GA2320, Hangars 8-10 Lynch Flying Service, is *not eligible* for listing in the NRHP under any criteria.
- Hangars 8-10 are the original three Lynch Flying Service Quonset Hangars that were on the front line of Gallatin Field following its construction in 1942. Each hangar is identical in dimension (100 by 50 ft) and are 5,000 square ft in area and are considered a resource unto themselves given that they were constructed identically and used as a singular entity in conjunction with each other. They are vertical sidewall hangars with barrel rooves and exposed metal sheathed side supports that give the hangar an appearance of the Quonset style. Each long side of the hangar has 11 side supports set into trapezoidal medium aggregate cement footings.
- The three hangars were moved in 1974 from their original position on the front line to where they currently reside just north of Taxiway G. It is unclear if the hangars were relocated in the same order/series. The hangars are not located on the current frontline of the GA apron.
- The Lynch Flying Service hangars (24GA2320) are significant for their association with the Civilian Pilot Training Program, however; they lack sufficient integrity to be considered eligible under Criterion A. Further, the hangars are not associated with persons significant to the past, as such, not eligible under Criterion B. The hangars are Quonset Hangars and representative of WW-II and 1950s construction, but lack integrity due to modifications. As such, are recommended not eligible under Criterion C. The hangars also lack potential to address historic research issues as it pertains to the history of aviation in the region or at a local level, and are not eligible for inclusion in the national register under Criterion D.
- The Lynch Flying Service hangars have been moved from their original location in 1974 and are no longer on the GA front line of hangars. While the new location is historically appropriate, it has nonetheless affected the hangars integrity of setting. Similarly, their integrity of location was affected by the move and residing and modifications (windows removed, modern materials) of the hangars have affected their historic integrity of materials, design, workmanship, feeling, and association. Their association with the Civilian Pilot Training Program, an important facet of WWII efforts to train pilots for the war effort has also been lost.

24GA2318 (Gallatin Airport Authority (GAA) Hangar)

- 24GA2318, Gallatin Airport Authority (GAA) Hangar, is *not eligible* for listing in the NRHP under any criteria.
- The GAA Hangar is an unremarkable 22-course cinder block building built in the mid-1970s. It is 125 by 50 ft (6,250 square ft) with a total of five hangar spaces that are currently leased. The roof is a very low pitch end gable. The northeast elevation end gable face, is Hangar 12. Hangar 12 has what appears to be a bi-fold hangar door with

a man door on the lower bifold with an additional door to the west of the hangar door.

- The GAA hangar is not significant for its association with early aviation in the region or other events that have made significant contributions to the broad patterns of our history, therefore would be considered not eligible under Criterion A. Further, the hangar is not associated with persons significant to the past, as such, not eligible under Criterion B. The hangar lacks components that are representative of a particular type, period, or method of construction. Nor do they represent unique engineering or architecture. As such, the hangar is recommended not eligible under Criterion C. The hangar also lacks potential to address historic research issues as it pertains to the history of aviation in the region or at a local level, and is not eligible for inclusion in the national register under Criterion D.

24GA2316 (National Guard Armory)

- 24GA2316, National Guard Armory, is *not eligible* for listing in the NRHP under any criteria.
- The former National Guard Armory, BZN Building 504, was built in 1959 and currently houses the BZN FAA Airway Facilities. The original building was approximately 70 by 40 ft (2800 square ft). The National Guard moved out 1989 to 1990, and the airport added the restrooms and office space to the east side of the building for the FAA to move into in 1990.
- The former National Guard Armory is not significant for its association with early military history in the region or other events that have made a significant contribution to the broad patterns of our history, therefore would be considered not eligible under Criterion A, additionally the armory has several aspects of integrity that have been compromised retaining location and setting only. Further, the armory is not associated with persons significant to the past, as such, not eligible under Criterion B. The armory lacks components that are representative of a particular type, period, or method of construction. Nor do does it represent unique engineering or architecture. As such, is recommended not eligible under Criterion C. The armory also lacks potential to address historic research issues as it pertains to the region or at a local level, and is not eligible for inclusion in the national register under Criterion D.
- The armory is unremarkable in design and has been significantly altered. Further the 1990 addition to the cinder block armory effected its integrity of materials, design, workmanship, feeling, and association. The building retains its integrity of location and setting only but it lacks any kind of individual distinction to the extent that it does not satisfy NRHP eligibility Criterion.

24GA2343 (1977 BZN Terminal Building)

- 24GA2343, 1977 BZN Terminal Building, is *not eligible* for listing in the NRHP under any criteria.

- The BZN terminal building was originally built in 1977. BZN was the recipient of a regional award for environmental design presented by the FAA in 1978 for its new terminal. M.M. Martin, FAA director stated, "The building is highly functional and an outstanding example of the use of design, art, and architecture to enhance the compatibility of airport structures with their surrounding environment."
- The terminal was expanded in 1994 and again in 2011, which expanded the terminal from four gates to 12. An 82,000 square foot, five-gate expansion of Terminal B was completed in 2020, with further terminal expansions planned as part of the East Terminal Expansion Project. The terminal currently has 12 gates (A1-5, B1-7) and two concourses, A and B. The 1977 portion of the BZN terminal is now home to the ground transportation/rental car lobby. A 440,000 square ft, 1,100 space, four-level parking garage was built immediately east of the terminal and opened in 2023.
- The 1977 BZN Terminal (24GA2343) is not significant for its association with early aviation history in the region or other events that have made a significant contribution to the broad patterns of our history, therefore would be considered not eligible under Criterion A, additionally the terminal has several aspects of integrity that have been compromised retaining location and setting only. Further, the terminal is not associated with persons significant to the past, as such, not eligible under Criterion B. The terminal, while praised in 1977 for its design, art, and architecture, now lacks components that are representative of a particular type, period, or method of construction with much of the 1977 design altered by modern remodeling and additions. Nor do does it represent unique engineering or architecture. As such, is recommended not eligible under Criterion C. The terminal also lacks potential to address historic research issues as it pertains to the region or at a local level, and is not eligible for inclusion in the national register under Criterion D.
- While praised for its design and use of local materials at that time, numerous significant expansions have compromised (as part of the logical expansion of an airport) much of the 1977 integrity. The site retains integrity of location and setting only.

<u>Ancillary Resources</u>

24GA0741 (Mammoth Ditch)

- 24GA0741, Mammoth Ditch, is ***not eligible*** for listing in the NRHP under any criteria.
- Site 24GA0741 is well documented with its initial recordation in 1985 with updates in 1993, 1999, 2018, and then twice in 2022. All have consistently recommended the resource as not eligible for inclusion in the NRHP.
- Within the project area the ditch crosses under the West ARFF road, at the northwest extent of Runway 12-30, via a corrugated metal culvert. The ditch runs roughly northeast/southwest at this point and can convey water to its terminus in Thompson Creek. The ditch is overgrown by grasses and is approximately three ft wide and two

to two-and-a-half ft deep. The ditch spans the BZN boundary for a length of 0.52 miles.
- The site is considered not eligible for the NRHP by the MTSHPO (File search #2021101402) based on all previous recordation.

24GA2317 (Secondary Route 290)
- 24GA2317, Secondary Route 290, is *not eligible* for listing in the NRHP under any criteria.
- Site 24GA2317 is an abandoned alignment of Montana Secondary Route 290. The north-south route is still paved, except for where it was covered and reseeded at the end of Runway 12-30 to accommodate the 500-ft by 1000-ft Runway Safety Area. The abandoned route on BZN property is approximately one mile long and approximately 18 ft wide.
- The segment of Secondary Route 290 within the APE is not significant for its association with early history in the region or other events that have made a significant contribution to the broad patterns of our history, therefore would be considered not eligible under Criterion A, additionally the road segment has several aspects of integrity that have been compromised retaining location only. Further, the segment is not associated with persons significant to the past, as such, not eligible under Criterion B. The site lacks components that are representative of a particular type, period, or method of construction. Nor do does it represent unique engineering or architecture. As such, it is recommended not eligible under Criterion C. The road also lacks potential to address historic research issues as it pertains to the region or at a local level, and is not eligible for inclusion in the national register under Criterion D.
- This previous alignment of Secondary Route 290, while possessing integrity of location, retains little else in regard to integrity as it serves a primary function to BZN rather than a route of public transportation. The route has been abandoned, seeded over in one segment, and no longer conveys its purpose as a secondary state highway to the extent that it does not satisfy NRHP eligibility Criterion.

24GA0423 (Precontact Camp)
- 24GA0423, Precontact Camp, is *not eligible* for listing in the NRHP under any criteria.
- Site 24GA0423 was a small, low density lithic scatter/habitation site consisting of chert and basalt debitage, one projectile point fragment, one obsidian flake, two chert cores, and one basalt core. Additionally, possible fire-cracked rock was reported. The site was originally recorded in June of 1978. At the time, no NRHP recommendation was offered nor is a report present on file at the MTSHPO. The site was revisited in 1992, but it is not clear if the site was located. A survey intensively examined the area in 2002, however, nothing was found.
- Location information provided by Baily (1978) places the site under the current East Apron/modern East Side Hangar developments north of Aviation Lane.

- Site 24GA043 has been previously listed as having "unresolved" eligibility for inclusion the NRHP (MTSHPO File search #2021101402). The site was fully surface collected by Baily in 1978 and was not able to be relocated by Meyer (2002), nor by the current investigation. RBAS recommends this resource as being Not Eligible for inclusion in the NRHP as it is no longer extant and its purported location under existing modern development. RBAS recommends no additional cultural resource investigation be required regarding 24GA0423, as such, the project will have no effect to this historic property. The FAA agrees with this recommendation.

24GA073 (Spain-Ferris Ditch)

- 24GA0743, Spain-Ferris Ditch, is considered to be eligible for inclusion in the NRHP by the MTSHPO (File search #2021101402) under Criterion A. In regard to those portions of the mainline and associated laterals found on the BZN grounds, the FAA has determined that the segments of 24GA0743 located on the BZN grounds no longer contribute to the site's greater eligibility given a complete loss of integrity through reconfiguration and modifications, as such should be considered as *non-contributing features to the 24GA0743*.
- Site 24GA0743 is well documented with its initial recordation in 1985 with updates in 2002, 2006, and most recently in 2020. The site continues to convey water except for those segments that have been abandoned. Moore (1985) recommended the site as not eligible for inclusion, as did Crofutt and Green (2002). Axline (2006), recommended the site as eligible for inclusion in the NRHP and received SHPO concurrence. The site form completed by Hope (2020) recommended that work at BZN in regard to the resource would not pose an adverse effect.
- The most recent effort by Hope (2020, 2021) summarizes the known aspects of the ditch and how the development of BZN has affected its alignment through runway expansions, storm water management, and alfalfa production with significant changes in the 1980s and 2010.
- The CRI provides excellent detail of how the portion of the Spain-Ferris Ditch that approaches and crosses BZN has been extensively modified over the years. While the Spain-Ferris Ditch is significant to early economic development and population settlement locally, the current lateral was not placed until at least 68 years after the initial construction of the ditch mainline, which lays to the east of the ditch portion involved in the current undertaking. This portion of the ditch has also been moved and modified several times since its construction, and it lacks the historic integrity required to be considered a contributing feature to the Spain-Farris Ditch site.

24GA1096 (Northern Pacific Low Line)

- The Low Line Spur of the Northern Pacific Railroad (24GA1096) is considered eligible for inclusion in the NRHP under Criteria A and B as it is part of the greater Northern Pacific entity present in Gallatin County. Regarding the portion of the Low Line Spur

present at BZN within the APE, the site has been largely destroyed save only a small segment of railbed prism. The FAA has determined that the segments of the Low Line Spur located on the BZN grounds no longer contribute to the sites greater eligibility given a complete loss of integrity through removal and development, and as such should be considered as *non-contributing segment to the 24GA1096*. [i]

- Site 24GA1096, the Northern Pacific Low Line was originally recorded by the Soil Conservation Service (1992) as site 24GA0999. Following the original recordation the MTSHPO subsumed the GA0999 Smithsonian site number under the greater 24GN1096 trinomial to give the Northern Pacific Railroad, and its spur lines, one Smithsonian trinomial number within Gallatin County.
- Within the APE, the Low Line is present at the northern extent where it has been largely erased as well as to the southeast near Dollar Drive where the railbed prism still exists. The prism is approximately 10 ft high with borrow ditches on either side. The railbed is approximately 100 ft wide ditch to ditch with the prism crest approximately 25 ft wide. The rails, ties, spikes, and signage are no longer present. The railbed in the vicinity of Dollar Drive has been breached as well, likely to facilitate water drainage from the property to the north. The line largely disappears past this point due to suburban development and agricultural practices.
- Regarding the portion of the Low Line Spur present at BZN within the APE, the site has been largely destroyed save only a small segment of railbed prism. The CRI recommends the segments of the Low Line Spur located on the BZN grounds no longer contribute to the sites greater eligibility given a complete loss of integrity through removal and development, as such should be considered as non-contributing segment to the 24GA1096. No additional cultural resource investigation for this resource is recommended. The FAA agrees with this recommendation.

24GA0394 (Coscik Place)

- 24GA0394, Coscik Place, is *not eligible* for listing in the NRHP under any criteria.
- Site 24GA0394 was originally recorded in 1995 and included as a historic farmstead originally constructed in 1868 and included seventeen features, eight of which were constructed during the historic period, retaining association with agricultural development of the Gallatin Valley in the early 20th century. The site was found eligible to the NRHP under Criterion A and C.
- Since the site's recordation in 1995, significant alterations to the site have occurred, most notably the removal of Feature 1, the 1922 Craftsman home. Other features have been removed or relocated to the point that the site no longer conveys its association with the "last major period of agricultural development in the Gallatin Valley" (Criterion A) nor does it represent an "early 20th century architectural styles common to these small farmsteads throughout Montana" (Criterion C) (Axline 1995). The site retains integrity of location only and no longer satisfies NRHP eligibility criteria.

24GA2327 (Heinrich Farmstead)

- 24GA2327, Heinrich Farmstead, is *not eligible* for listing in the NRHP under any criteria.
- The compound plan (576 sq ft) National folk style farmhouse was built in 1914.
- Today, the site consists of the Heinrich Farmstead, which includes a modern shop, storage shed, and the farmhouse only. The property is clearly visible in a 1947 ariel photograph of the property. The attached garage (n.d.) was remodeled in 2001 and is likely not original to the 1914 National folk style/period. It was likely added on possibly in the 1940s when the outbuildings were constructed. A modern 35 by 25 ft (875 sq ft) shop/garage was added to the property in 2018. The lone remaining outbuilding is a small (6 by 10 ft) single story, cross gabled storage shed. Other outbuildings present on site were removed in 2022
- The original farmhouse has seen significant modification with modern vinyl siding and windows, an historic-era attached garage addition, a modern shop, and removal of outbuildings. A lateral branch of the Spain-Ferris Ditch (24GA0743) clips the very southeastern portion of the farmstead.
- The Heinrich Farmstead (24GA2327) is not significant for its association with early history in the region or other events that have made a significant contribution to the broad patterns of our history, therefore would be considered not eligible under Criterion A. Further, the site is not associated with persons significant to the past, as such, not eligible under Criterion B. The site lacks components that are representative of a particular type, period, or method of construction. Nor do does it represent unique engineering or architecture. As such, it is recommended not eligible under Criterion C. The site also lacks potential to address historic research issues as it pertains to the region or at a local level, and is not eligible for inclusion in the national register under Criterion D.
- The residence retains its integrity of location and setting only but it lacks any kind of individual distinction to the extent that it does not satisfy NRHP eligibility Criterion. Significant remodeling, loss out outbuildings, and residential development of what were agricultural lands associated with the farmstead has compromised much of the site's integrity. The residence retains its integrity of location and setting only but it lacks any kind of individual distinction to the extent that it does not satisfy NRHP eligibility Criterion.

BH-ISO-1 (Isolated Find)

- BH-ISO-1, Isolated Find, is *not eligible* for listing in the NRHP under any criteria.
- Isolated find BH-ISO-1 is the proximal fragment of a tertiary, basalt bifacial thinning flake. The flake is 3.1 centimeters (cm) in length, 2.9 cm in width, and is 0.3 cm thick. It was found on an alluvial terrace of Hyalite Creek. Surface visibility here is

approximately 70 percent and no other artifacts were identified at this locality or on the surrounding landforms.

The FAA invited the Blackfeet Nation, the Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Fort Peck Assiniboine and Sioux Tribes, the Nez Perce Tribe, and the Shoshone-Bannock Tribes of the Fort Hall Reservation to provide information to the surveys and to participate in government-to-government consultation for the proposed improvements. The letters were dated May 14, 2025. No substantive comments have been received to date.

In addition to the determinations of eligibility of resources to the NRHP, the FAA has also considered the effects of the undertaking on historic resources. Grading will be required to update and improve Runway 11-29, taxiways, associated improvements, relocation of the VOR, and the hangar development area on the north apron. All disturbance required for the undertaking is in areas previously disturbed by airport and urban development. The Spain-Ferris Ditch on BZN property will be affected; however, the FAA has determined that the portions of the Ditch on BZN property are non-contributing segments, and so will not effect the overall eligibility of the Spain-Ferris Ditch. However, in order for the VOR (24GA2322) to be relocated, the integrity of the resource will be adversely affected. The FAA has determined that this will constitute an ***Adverse Effect to Historic Properties***. The FAA will be in contact with the Montana SHPO to discuss a mitigation strategy for inclusion in a Memorandum of Agreement (MOA).

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

Sincerely,

Heidy Bruner, P.E.
Environmental Protection Specialist

Enclosures:
Project Description and Project Layout
Cultural Resources Inventory
cc: (Via e-mail)
Gallatin Airport Authority
Morrison-Maierle, Inc.
file

Project Description:

The Bozeman Yellowstone International Airport (BZN) is located in Gallatin County in southwest Montana. The Sponsor for BZN, the Gallatin Airport Authority, is a public authority created, established, and empowered by the Gallatin County Commission with complete authority over the Airport. The Sponsor is proposing to improve Runway 11-29 by lengthening and widening the runway to accommodate larger aircraft, as well as constructing improvements north of Runway 11-29 in the Northside General Aviation (GA) Development Area to accommodate the construction of hangars to meet user demand. The proposed improvements are collectively referred to as the Proposed Action (undertaking), which will reduce congestion for aircraft operating in and around the airport. The Northside Development area is needed to meet hangar demand. The undertaking is described below and depicted in the following figures.

Elements of the Proposed Action include:

- Improve Runway 11-29 to meet D-IV standards (widen and extend)
- Construct Northside GA Development
- Several ancillary projects that are needed to ensure safe operations associated with the improvements to Runway 11-29 and the Northside GA Development

An overall layout of the Proposed Action is provided in Figure 1. Figures 2, 3, and 4 provide focused depictions of specific improvements.

Details and Ancillary improvements associated with Runway 11-29 Improvements include:

- Widen Runway 11-29 from 75 feet to 150 feet
- Lengthen Runway 11-29 from 5,050 feet long to 7,480 feet long
- Relocate the Very High Frequency Omni-Directional Range (VOR) navigation system, including filling/grading of abandoned gravel pit at the new location
- Relocate the Precision Approach Path Indicators (PAPI) for Runway 11 to facilitate the extension of Runway 11-29
- Extend Medium Intensity Runway Lighting (MIRL) to accommodate extension of Runway 11-29
- Close turf Runway 11G-29G
- Relocate effluent irrigation
- Construct Taxiway C, taxiway connectors, and GA Area hangar access taxilanes
- Install/extend associated Medium Intensity Taxiway Lighting (MITL)
- Abandon of portions of Airport Road, Tubb Road, East Baseline Road, and Lagoon Road on airport property
- Construct the proposed Tarmac Trail (including any associated improvements to State Highway 205)
- Modify flight procedures

- Relocate and extend security fence
- Improve drainage

Details and Ancillary improvements associated with construction of the Northside GA Area include:

- Construct apron(s), taxilanes, hangars and supporting infrastructure (vehicle access roads, utilities (water, sewer, power, power/natural gas/fiber/phone), etc.)
- Abandon portions of Tubb Road, East Baseline Road, and Lagoon Road on airport property
- Relocate security fence
- Improve drainage

Figure 1: Proposed Action

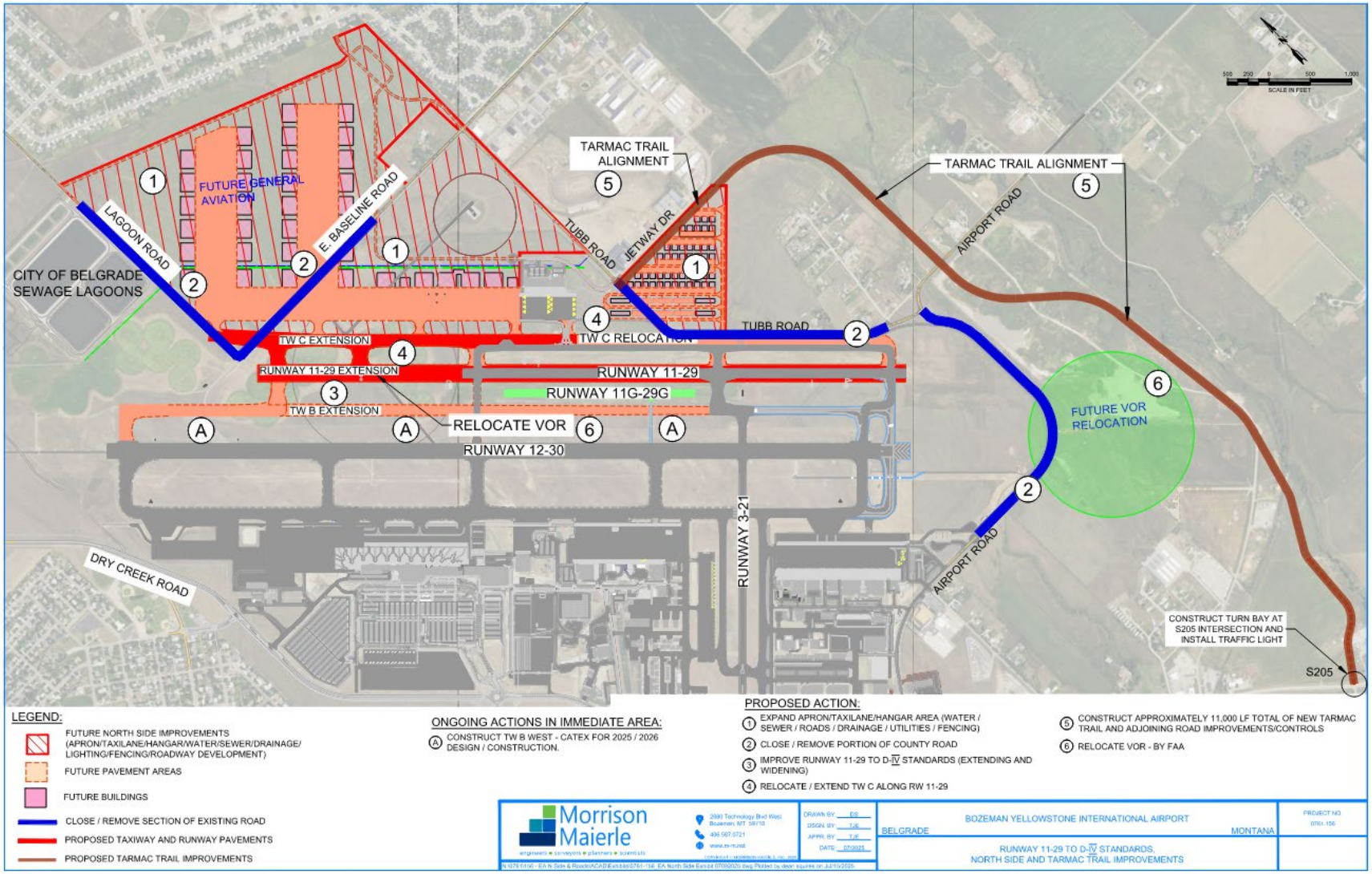


Figure 2: Runway 11-29 Extension, Widening, and Taxiway Improvements

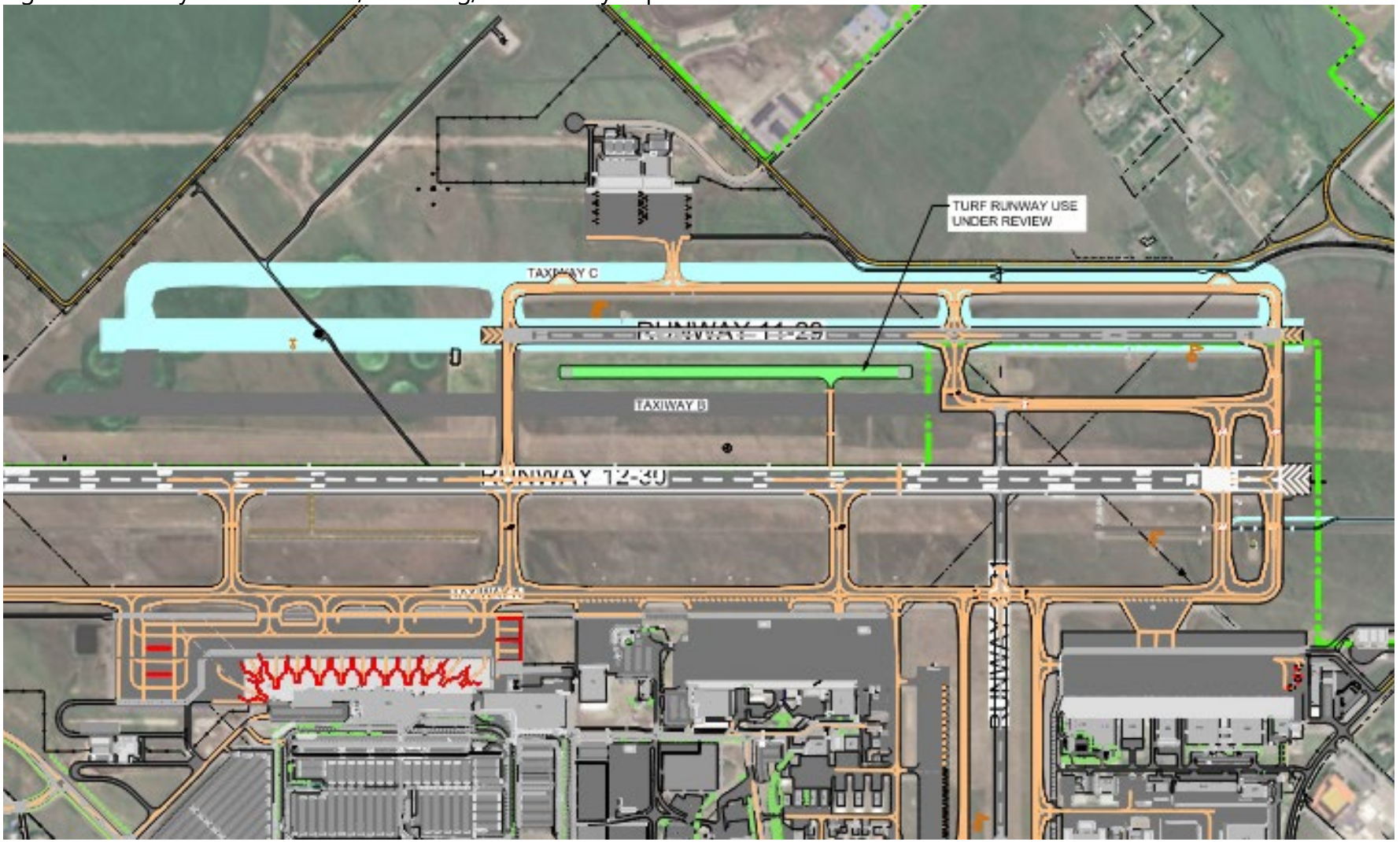


Figure 3: Road Improvements and Very High Frequency Omnidirectional Range (VOR) Station Relocation

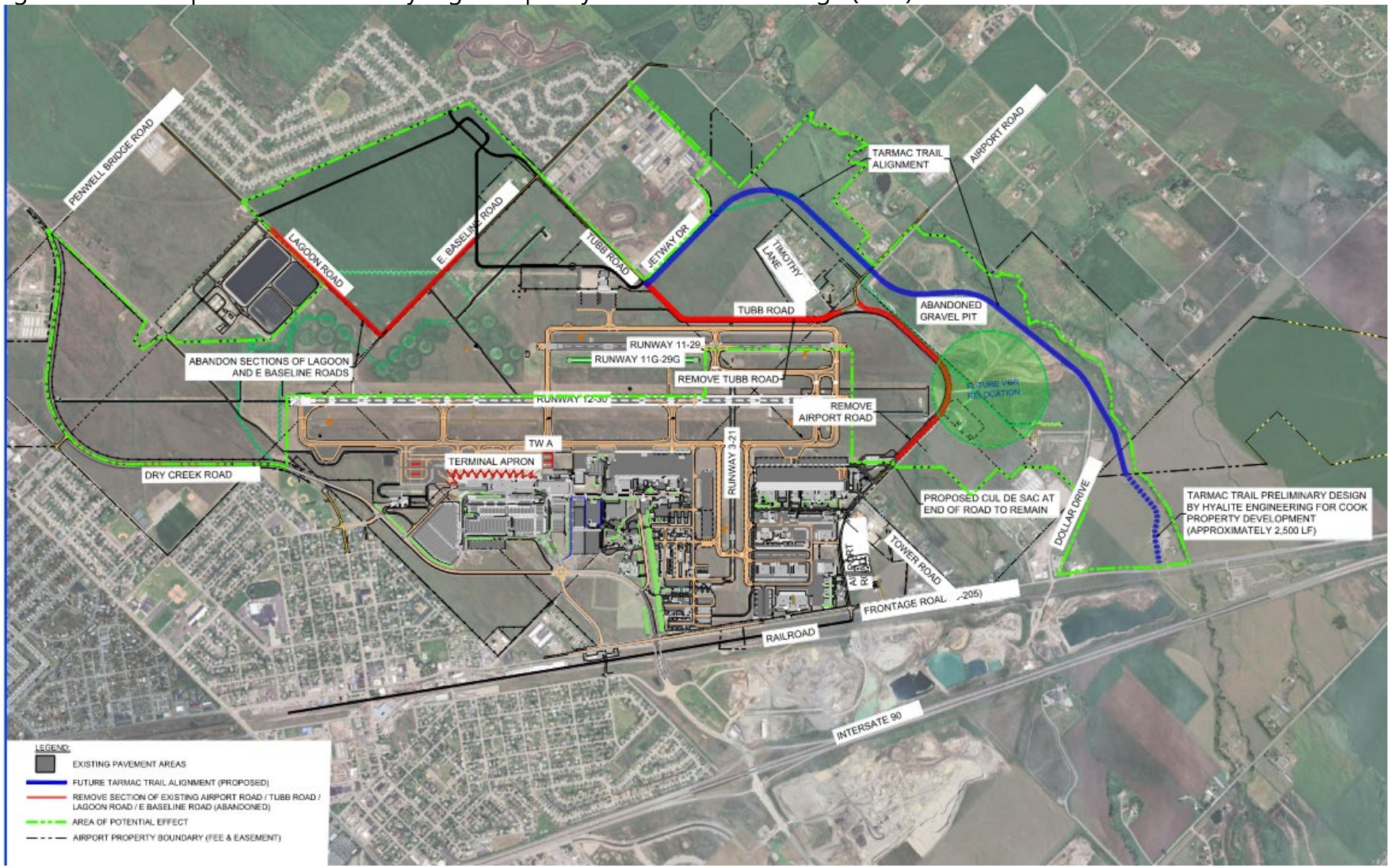
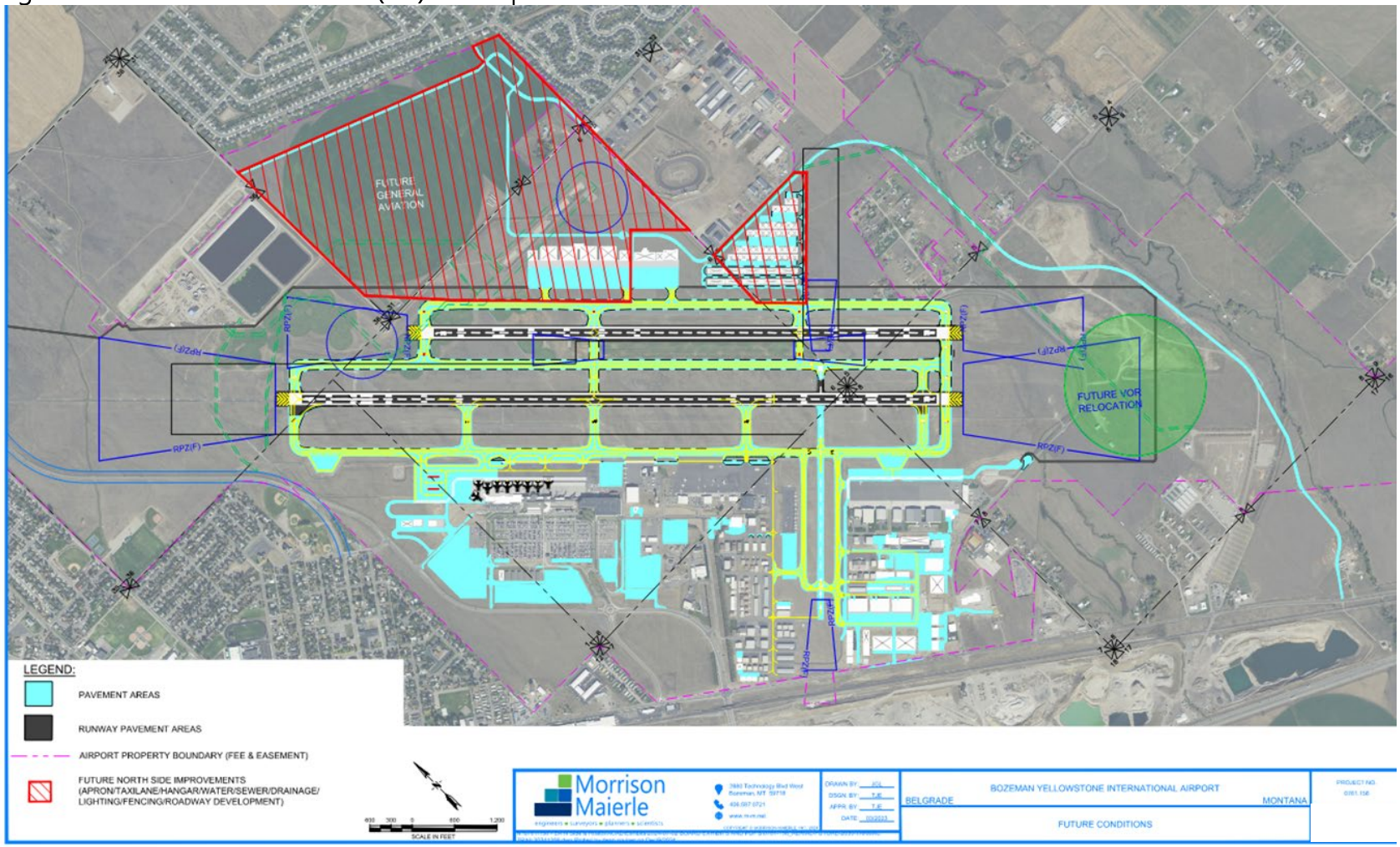


Figure 4: North General Aviation (GA) Development Area



Appendix L:

Farmland Soil Types – Locations – AS 1006

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I *(To be completed by Federal Agency)*	Date Of Land Evaluation Request July 2024	
Name of Project BZN Airport Environmental Assessment	Federal Agency Involved FAA	
Proposed Land Use Airport	County and State Gallatin County, MT	
PART II *(To be completed by NRCS)*	Date Request Received By NRCS 08/29/2024	Person Completing Form: Nathan Parrv

Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)*	YES ☑	NO ☐	Acres Irrigated 80,504	Average Farm Size 650

Major Crop(s)	Farmable Land In Govt. Jurisdiction	Amount of Farmland As Defined in FPPA
Hay/haylage and wheat for grain	Acres: 459,17(% 28.7	Acres: 600,12% 37.5

Name of Land Evaluation System Used	Name of State or Local Site Assessment System	Date Land Evaluation Returned by NRCS
County spring wheat CPI	NA	09/13/2024

PART III *(To be completed by Federal Agency)*	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	116			
B. Total Acres To Be Converted Indirectly	0			
C. Total Acres In Site	1523			
PART IV *(To be completed by NRCS)* Land Evaluation Information				
A. Total Acres Prime And Unique Farmland	42.2			
B. Total Acres Statewide Important or Local Important Farmland	73.8			
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	.019			
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	18.5			
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)	38			

PART VI *(To be completed by Federal Agency)* Site Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)*	**Maximum Points**	Site A	Site B	Site C	Site D
1. Area In Non-urban Use	(15)	5			
2. Perimeter In Non-urban Use	(10)	7			
3. Percent Of Site Being Farmed	(20)	1			
4. Protection Provided By State and Local Government	(20)	0			
5. Distance From Urban Built-up Area	(15)	5			
6. Distance To Urban Support Services	(15)	0			
7. Size Of Present Farm Unit Compared To Average	(10)	0			
8. Creation Of Non-farmable Farmland	(10)	0			
9. Availability Of Farm Support Services	(5)	5			
10. On-Farm Investments	(20)	2			
11. Effects Of Conversion On Farm Support Services	(10)	0			
12. Compatibility With Existing Agricultural Use	(10)	0			
TOTAL SITE ASSESSMENT POINTS	160	25	0	0	0
PART VII ***(To be completed by Federal Agency)***					
Relative Value Of Farmland *(From Part V)*	100	38	0	0	0
Total Site Assessment *(From Part VI above or local site assessment)*	160	25	0	0	0
TOTAL POINTS ***(Total of above 2 lines)***	260	63	0	0	0

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? YES ☐ NO ☐

Reason For Selection:

Name of Federal agency representative completing this form:	Date:

(See Instructions on reverse side) **Form AD-1006 (03-02)**

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, http://fppa.nrcs.usda.gov/lesa/.

Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s)of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map**,** or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)

Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.

Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.

Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.

Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.

Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.

2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.
Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \text{ X } 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

USDA United States Department of Agriculture

Farm Production and Conservation

Natural Resources Conservation Service

Bozeman State Office
10 East Babcock Street
Room 443
Bozeman, MT 59715

September 13, 2024

Faith Doty
Environmental Scientist
Morrison-Maierle
2880 Technology Blvd W.
Bozeman, MT 59718

RE: Farmland Conversion Impact Rating for Bozeman Airport (BZN) Project

Faith:

This letter is in response to your correspondence of 29 August 2024. You requested the Natural Resources Conservation Service (NRCS) to review and comment on potential impacts associated with the Bozeman-Yellowstone International Airport project in Gallatin County, Montana.

The provisions of the Federal Farmland Protection Policy Act (FPPA) requires evaluation of important status farmland (prime farmland, farmland of statewide importance, or locally important farmland) when the actions or assistance of a federal agency irreversibly converts (directly or indirectly) farmland.

Enclosed is the FPPA assessment for the Bozeman Airport project. The evaluation was determined for the project located within the respective County and resulted in the completion of form AD-1006. A portion of your project is in a designated urban area by the U.S. Census Bureau. This urban area designation is considered land already converted, and therefore is excluded from FPPA provisions. I subtracted out the 220-acre tract from the assessment. This is the area already designated as urban land. The form should provide adequate information necessary to determine if the proposed conversions are consistent with the FPPA and the agencies internal policies.

Farmland receiving a score of 160 points or more requires evaluation of alternatives to mitigate the impact to important farmland. Farmland receiving a combined score of less than 160 points is not subject to the provisions of the FPPA.

With respect to other potential environmental impacts, NRCS has no additional regulatory or oversight responsibilities and as such, has no further comments concerning the proposed project.

If you have any questions regarding this response, please email me at nathan.parry@usda.gov.

Nathan Parry
Montana State Soil Scientist

Appendix M:

Summary of Public Involvement

APPENDIX M. SUMMARY OF PUBLIC INVOLVEMENT

The EA coordination process provided the public and resource and regulatory agencies with jurisdiction or expertise the opportunity to submit comments.

M.1 Agency Coordination

Morrison-Maierle, Inc. conducted numerous agency outreach endeavors over the course of the developing EA. Initial correspondence was submitted on June 7, 2024. Please refer to **Appendix I** for agency coordination letters and responses. The FAA initiated Section 106 consultation with the Montana SHPO on July 21, 2025. The Montana SHPO concurred that the Proposed Action will result in Adverse Effects of Historic Properties, specifically 24GA2322(VOR), (see **Appendix I and K** for concurrence letter). **Table M-1**: *Agency Communication Received* documents agency comments that were received as a result of the June 2024 request for agency comment and ongoing communications and FAA correspondence with agencies.

Table M-1: Agency Communication Received

Agency	Contact Information	Date Correspondence Received	Comments Synopsis
ACHP	Advisory Counsel on Historic Preservation Rachael Mangum rmangum@achp.gov (202) 517-0200	November 19, 2025	Correspondence that the ACHP anticipates only becoming involved in any historical mitigation if requested by SHPO, Tribal entity, or any other party.
SHPO	Montana State Historic Preservation Office Samantha McGowen Samantha.McGowen@mt.gov (406) 444-2694	October 8, 2025	Correspondence that MTSHPO concurred with FAA's eligibility and effect determinations of historic properties.
MDT	Montana Department of Transportation Jean Riley, P.E. jriley@mt.gov (406) 444-9456	March 14, 2025	Correspondence with comments regarding the Traffic Impact Study.
Gallatin County	Gallatin County Road Department Levi Ewan, P.E. Levi.Ewan@gallatin.mt.gov (406) 582-3250	March 14, 2025	Correspondence that no comments at this time regarding the Traffic Impact Study.
City of Belgrade	City of Belgrade Public Works Department Camaree Uljua, P.E. culjua@belgrademt.gov (406) 388-3578	March 11, 2025	Correspondence with comments regarding the Traffic Impact Study.
USFWS	U.S. Fish and Wildlife Service (406) 430-9007 jacob_martin@fws.gov	September 27, 2024 July 8, 2025	Correspondence that there are no significant comments or concerns regarding grizzly, lynx, or wolverine as a result of project improvements. Noted potential for presence of Ute Ladies' Tresses, Monarch Butterflies and Bald Eagles.
USDA	USDA, NRCS Bozeman State Office Nathan Parry, MT State Soil Scientist nathan.parry@usda.gov	September 13, 2024	Farmland conversion impact rating assessment noting BZN in an urban area that is considered 'already converted' and noting no mitigation needed.

MDT Aeronautics	MDT Aeronautics 406-444-2506 tconway@mt.gov	July 2, 2024	Concurrence with project need. No conflict with MDT Aeronautics resources.
US Army Corps of Engineers	US Army Corps of Engineers	June 18, 2024 June 25, 2024 July 3, 2024	Jurisdictional determinations of water features in the study area, information and resources for permitting
Mammoth Ditch Company	Mammoth Ditch Company justinmohler@gmail.com, rhett.boerger@bozemanairport.com	June 13, 2024	Noted no known impacts to Mammoth Ditch; outside project area
NorthWestern Energy	NorthWestern Energy Sady.Babcock@northwestern.com 406-497-3148	June 7, 2024	No comment on environmental effects

M.2 Public Scoping, Information & Hearing

To maximize public exposure, project information was presented via the airport website, social media and meetings for the public.

The airport stood up a project home page with background information, exhibits, open house information and contact information for comments and questions on July 3rd, 2024.

An open house was conducted on August 1, 2024, from 5:30 – 7:30 p.m. While no formal presentation was conducted, stations were set up with consultant and Airport representatives available to review exhibits and proposed action improvements. The open house was advertised through a robust social media campaign coordinated by Big Sky Public Relations through Facebook, Instagram, and local news media outlets.

In addition to the open house described above, the EA has been a standing agenda item at numerous Airport Board meetings throughout the course of the EA. The meetings are held monthly and are open to the public.

During the 30-day public comment period a robust social media campaign will be coordinated by Big Sky Public Relations through Facebook, Instagram, and local news media outlets. In addition, a public open house will be held that presents the findings of the EA and solicits public comment. This hearing was conducted on XXXX from XXXX.

M.3 Distribution of the Draft EA

Public review of the Draft EA will be invited for a 30-day period. The notice of availability will be published in The Bozeman Daily Chronicle based out of Bozeman, Montana, as well as advertised through a robust social media campaign coordinated by Big Sky Public Relations through Facebook, Instagram, and local news media outlets. Agencies that provided comments during scoping will receive written notification informing them of the review period. The Draft EA will be posted on the Bozeman Yellowstone International Airport website. Comments will be solicited to be submitted through the Airport's website, through Big Sky Public Relations, or Morrison-Maierle as the prime consultant on the EA.

M.4 Final Environmental Assessment

Agency and public comments received on the Draft EA will be considered and addressed in the Final EA. The Final EA will be made available on the Bozeman Yellowstone International Airport website.

Appendix N:

List of Preparers

APPENDIX N. LIST OF PREPARERS

Federal Aviation Administration

The FAA is the lead agency responsible for the preparation and approval of this EA. The following staff were primarily responsible for the development of the EA:

Heidy Bruner, P.E., Environmental Protection Specialist
Helena Airport District Office
FAA Northwest Mountain Region

Diane Stilson, P.E., Airport Engineer / Environmental Protection Specialist
Helena Airport District Office
FAA Northwest Mountain Region

Morrison-Maierle, Inc. – Main Body Text and Analysis

Responsibility for preparation of this EA rests with the Gallatin Airport Authority as the Sponsor. The prime consultant for preparation of the document was Morrison-Maierle, Inc. (MMI). Below are the MMI staff members who were responsible for the EA preparation.

Morrison-Maierle, Inc.
Airport Group
2880 Technology Blvd. West (physical)
P.O. Box 1113 (mailing)
Bozeman, MT 59718
(406) 587-0721

- Travis J. Eickman, P.E., Vice President, Senior Airport Engineer, M.S. Civil Engineering, 28 years airport project management experience.
- Mike Carlson, Senior Airport Planner, M.S. Planning, B.A. History. 30 years of experience in airport planning.
- Scott Eaton, Senior Airport Planner, M.P.A. Public Administration, B.A. Political Science, B.A. Sociology. 17 years of airport and municipal planning experience.
- Christine Pearcy, Environmental Scientist, M.S. Earth and Environmental Science, B.S. Natural Resources and Environmental Science. 20 years of experience in environmental data collection and assessment.
- Faith Doty, Environmental Scientist, B.S. Land Rehabilitation. 9 years of experience in environmental data collection and assessment.
- Scott T. Bell, P.E., Client Service Manager, Vice President, Airport Market Group Leader, M.S. Civil Engineering, 40 years airport project management experience.
- Mark J. Maierle, P.E., Senior Airport Engineer, M.S. Construction Engineering Management, 28 years airport project management experience.

Morrison-Maierle, Inc. Subconsultants

- Cultural Resource Inventory by Rabbitbrush Archaeological Services, LLC. c/o Brian Herbel, Stevensville, MT.

- Traffic Impact Study by Hyalite Engineers, PLLC, c/o Mike Stenberg and Cody Kerkaert, Bozeman, MT.
- Public Relations by Big Sky Public Relations, c/o Kristine Fife, Stevensville, MT

Appendix O:

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