APPENDIX C

Class III Cultural Resources Inventory and Architectural History Survey of the Driggs-Reed Memorial Airport

030488.001 and 030488.004

September 2020

By: Kasey Fulwood, M.A., Courtney Mooney, M.S., and Greta Rayle, M.A., RPA

North Wind Resource Consulting, LLC — 1425 Higham Street, Idaho Falls, ID 83402

Abstract

North Wind Resource Consulting, LLC (North Wind) was contracted by Jviation, Inc. (Jviation) to conduct a Class III cultural resources inventory (CRI) and architectural history survey (architectural survey) of the Driggs-Reed Memorial Airport located within the city of Driggs, Teton County, Idaho. Driggs-Reed Memorial Airport is located at 253 Warbird Lane, Driggs, Idaho.

A CRI of 90 acres within the Driggs-Reed Memorial Airport was previously completed by North Wind in 2014 (Schlegel and Shelton 2014); however, an architectural survey of the property was not completed at that time. Additionally, since that date, 240 acres of agricultural land located at the north end of the current runway system at the Driggs-Reed Memorial Airport has been proposed for acquisition. Upon acquisition of the land, the City of Driggs is planning to shift the existing Runway 4-22 runway system to the northeast, relocate the runway protection zone, and improve the runway approach and departure surfaces. Other proposed project activities include extending the runway pavement on the northeast end of Runway 22; extending the existing west parallel taxiway and new connecting taxiway at the relocated Runway 22; relocating the Runway 4 threshold; removal of existing pavement south of the relocated Runway 4 end; construction of paved blast pads off the ends of each runway; closure of Teton Park Road, extension of Sweetgrass Road, and the construction of a new connector road between Sagebrush and Sweetgrass roads; removal of the existing property fence and construction of new wildlife fencing along the new property line; relocation of associated Navigational Aids (NAVAIDS); and amending flight procedures to accommodate the shift in runway location. The goal for the project is to support a safe and viable airport now and into the future by correcting deficiencies to Federal Aviation Administration (FAA) guidelines and standards. The current CRI and architectural survey were completed as a supplement to the 2014 CRI as part of the land acquisition process for use by the FAA. Jviation is the engineering firm responsible for designing the improvements associated with the proposed project.

One previously recorded cultural resource was identified within the APE. Site 10TN67 (Grand Teton Canal) has previously been determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A. Within the project area, the Grand Teton Canal (10TN67) consists of one previously recorded segment measuring approximately 0.72 miles long, which runs east-west along the southern boundary of the project area, and three interconnected lateral irrigation ditches which branch off of the canal and transect the project area in various locations. This feature of the Grand Teton Canal (IHSI No. 10TN67) within the current project area retains its integrity of workmanship, materials, design, location, and association. The canal's integrity of setting has been compromised by the encroachment of residential development which has replaced agricultural uses with residential subdivisions. However, as it retains six of the seven aspects of historic integrity, and continues to provide water for agricultural use, the canal segment and associated ditches within the APE are recommended to be contributing elements of the larger Grand Teton Canal System.

Additionally, two newly recorded historic-age properties—the Driggs-Reed Memorial Airport and runway—are located within the APE. The Driggs-Reed Memorial Airport (NRD-1) and runway (FN-35) are not recommended eligible for NRHP listing under any criteria.

CERTIFICATION OF RESULTS

I certify that this investigation was conducted and documented according to Secretary of Interior's Standards and guidelines and that the report is complete and accurate to the best of my knowledge.

Greta Rayle

Signature of Principal Investigator

10/19/2020

Date

Key Information

PROJECT NAME

Class III Cultural Resources Inventory and Architectural History Survey of the Driggs-Reed Memorial Airport

PROJECT NUMBER(S)

030488.001 and 030488.004

LOCATION

Teton County

USGS QUADS

Driggs, Idaho

LEGAL LOCATION OF SURVEY

Township 5 North (T5N), Range 45 East (R45E), Sections 13 and 23; Township 5 North (T5N), Range 46 East (R46E), Section 18; Township 5 North (T5N), Range 45 East (R45E), Sections 24 and 26; and Township 5 North (T5N), Range 46 East (R46E), Section 19

PROJECT AREA

425.30 Acres

AREA SURVEYED

149.55 Acres

PROJECT DATA

1 Previously recorded cultural resource

2 New cultural resources located and/or recorded

AUTHORS

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FEDERAL AGENCY

Federal Aviation Administration

REPORT PREPARED FOR

Jviation, Inc.

REPOSITORY

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PRINCIPAL INVESTIGATOR

Greta Rayle. M.A, RPA

DATE

9/9/2020

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Project Description

At the request of Jviation Inc., North Wind Resource Consulting, LLC (North Wind) conducted a Class III Cultural Resources Inventory (CRI) and Architectural History Survey (architectural survey) of the Driggs-Reed Memorial Airport (formerly known as the Teton Peaks-Driggs Airport) property located in the City of Driggs, Teton County, Idaho.

A CRI of 90 acres within the Driggs-Reed Memorial Airport was previously completed by North Wind in 2014 (Schlegel and Shelton 2014); however, an architectural survey of the property was not completed at that time. Additionally, since that date, 240 acres of agricultural land located at the north end of the current runway system at the Driggs-Reed Memorial Airport has been proposed for acquisition. Upon acquisition of the land, the City of Driggs is planning to shift the existing Runway 4-22 runway system to the northeast, relocate the runway protection zone, and improve the runway approach and departure surfaces (Figure 2). Other proposed project activities include extending the runway pavement on the northeast end of Runway 22; extending the existing west parallel taxiway and new connecting taxiway at the relocated Runway 22; relocating the Runway 4 threshold; removal of existing pavement south of the relocated Runway 4 end; construction of paved blast pads off the ends of each runway; closure of Teton Park Road, extension of Sweetgrass Road, and the construction of a new connector road between Sagebrush and Sweetgrass roads; removal of the existing property fence and construction of new wildlife fencing along the new property line; relocation of associated Navigational Aids (NAVAIDS); and amending flight procedures to accommodate the shift in runway location. The goal for the project is to support a safe and viable airport now and into the future by correcting deficiencies to Federal Aviation Administration (FAA) guidelines and standards. The current CRI and architectural survey were completed as a supplement to the 2014 CRI as part of the land acquisition process for use by the FAA. Jviation is the engineering firm responsible for designing the improvements associated with the proposed project.

The project area encompasses 425.30 acres and is located in portions of Township 5 North (T5N), Range 45 East (R45E), Section 13; Township 5 North (T5N), Range 46 East (R46E), Section 18; Township 5 North (T5N), Range 45 East (R45E), Section 24; Township 5 North (T5N), Range 46 East (R46E), Section 19; Township 5 North (T5N), Range 45 East (R45E), Section 23; Township 5 North (T5N), Range 45 East (R45E), Section 24; and Township 5 North (T5N), Range 45 East (R45E), Section 26, Boise Meridian. It is depicted on USGS 7.5' topographical maps for Driggs and Clawson, Idaho (Figure 3).

Project Area of Potential Effect (APE)

The project area encompasses 425.3 acres and consists of an irregularly-shaped parcel centered on the airport's existing runway and taxiway systems (Figure 4). The northern portion of the project consists entirely of agricultural fields while the central and southern portions include the airfield and associated structures comprising the Driggs-Reed Memorial Airport. Areas previously surveyed by North Wind in 2014 were not re-surveyed as part of the current project (see Figure 3).

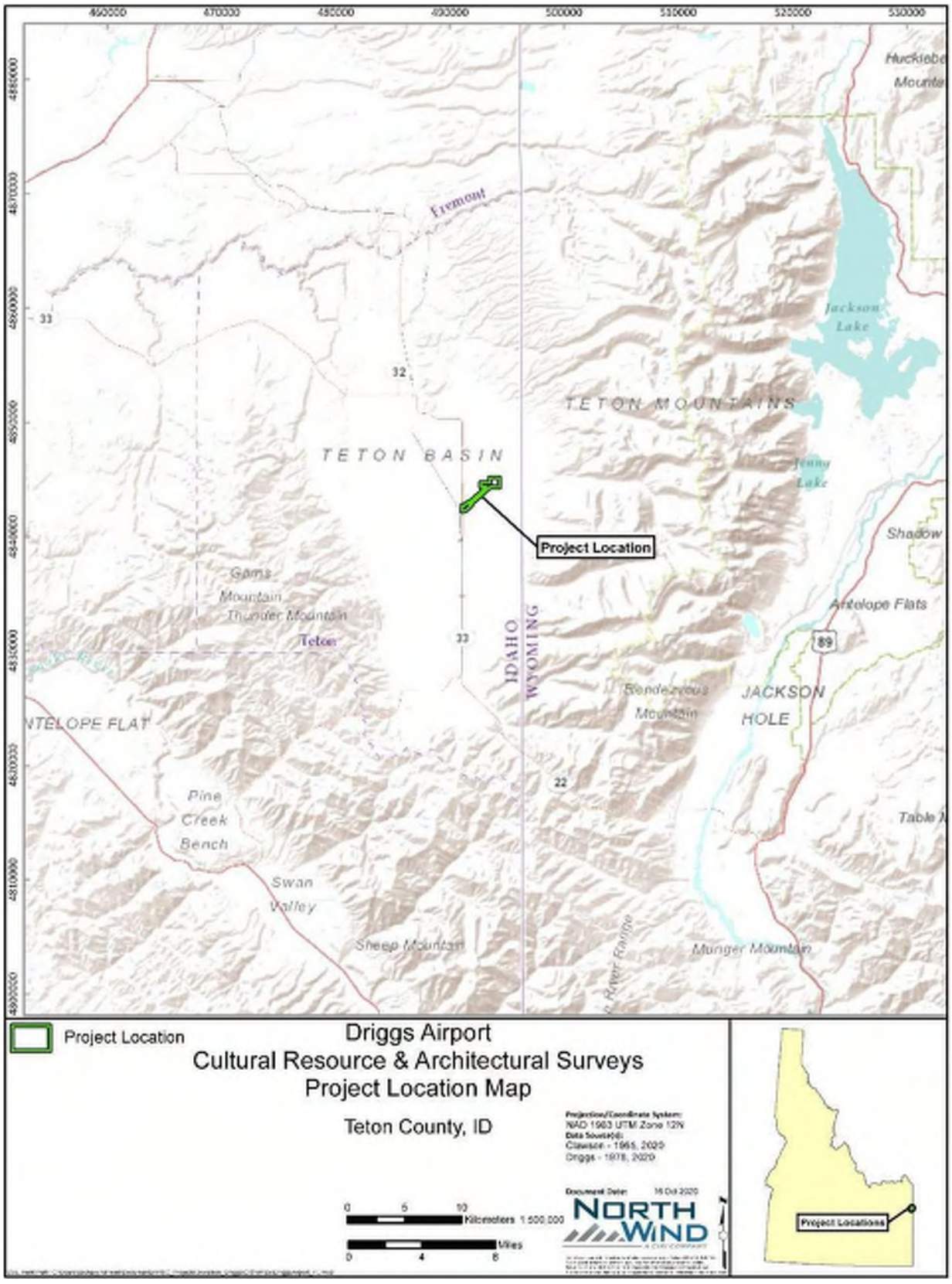

Figure 1. Driggs Airport project location.

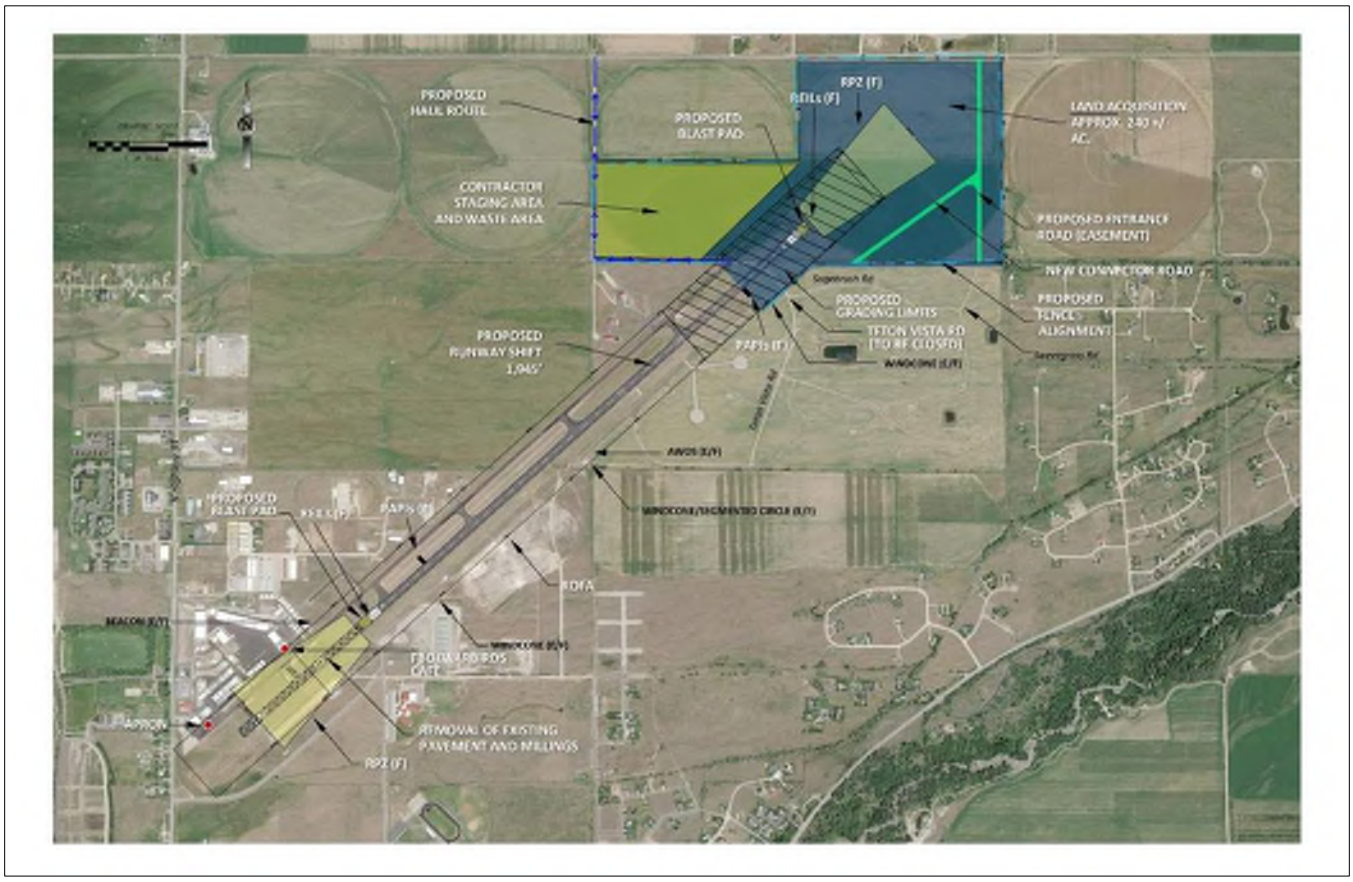

Figure 2. Plan of proposed developments at Driggs-Reed Memorial Airport (Figure courtesy of Jviation Inc.).

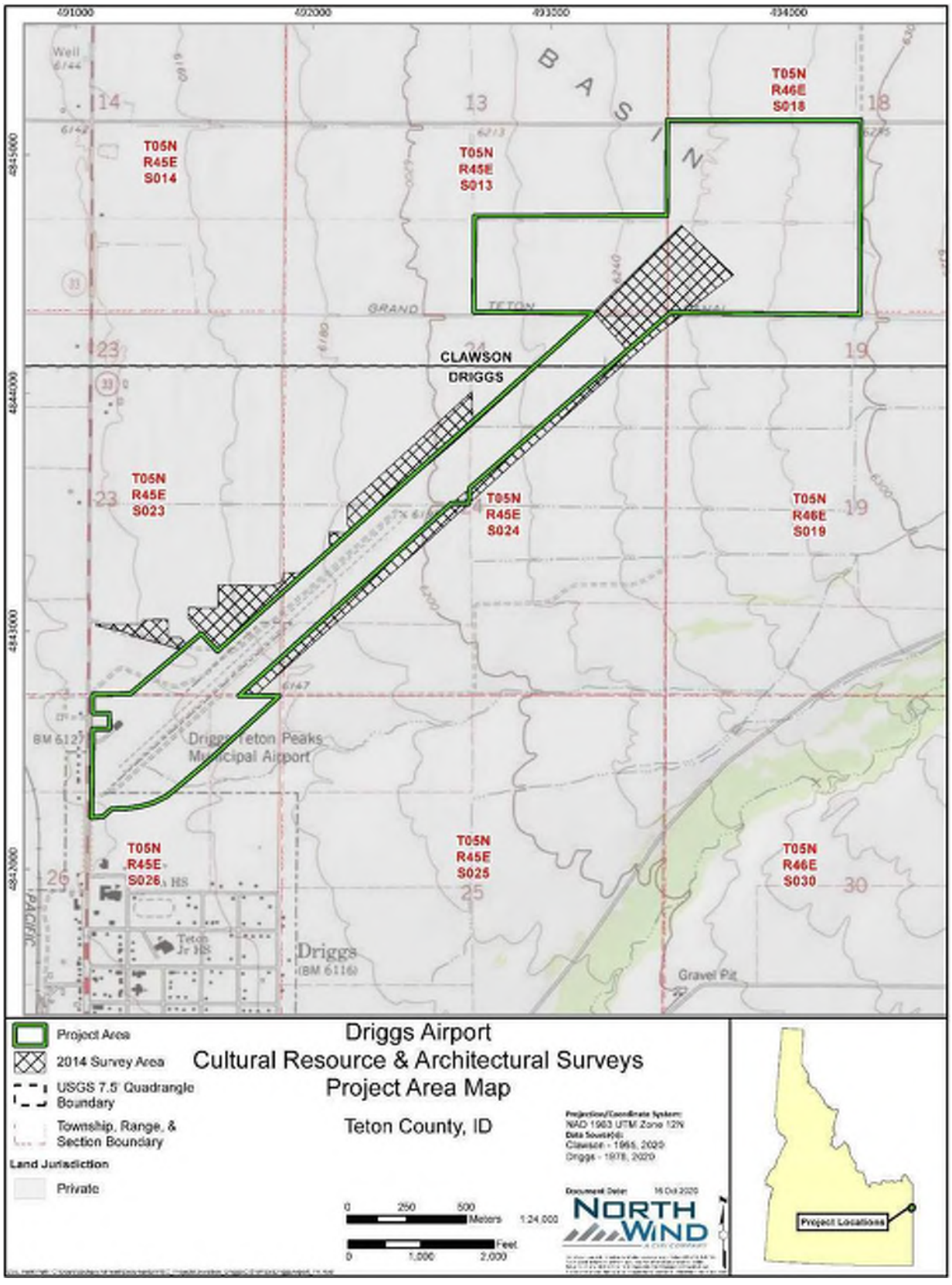

Figure 3. Driggs Airport project location.

Environmental Setting

The Driggs-Reed Memorial Airport is located in the Middle Rocky Mountain Province in the Teton Basin (Fenneman 1931). The Teton Basin is situated within the Wyoming Overthrust Belt System located in eastern Idaho and western Wyoming between the Teton Mountain Range to the east and the Big Hole Mountain Range to the west. The basin is level, with the surrounding mountainous landscape brought about by historic uplifts, faults, fault blocks, alluvial deposits, and stream cutting action that has created steep narrow canyons. The survey area is situated in the southeast portion of the Teton Basin at an elevation of 6,200 feet above mean sea level (amsl).

The Tetons are a basement rock hoisted along a fault that defines the eastern edge of the range (Alt and Hyndman 1989). They consist of a core of igneous and metamorphic Precambrian rocks overlain in most of the range by westward dipping sedimentary Paleozoic rocks. About 10 million years ago, stresses of the Earth's crust caused movement along the Teton fault, which lies on the 40-mile-long eastern front of the Teton Range. Whereas the western part of the fault pushed upwards to form the Teton Range—the youngest range of the Rocky Mountains, the east side of the fault simultaneously dropped downward to form the valley of Jackson Hole. It is this dynamic of the west side of the fault that creates the outstanding rock monoliths that are the Grand Tetons (Greater Yellowstone Resource Guide 2010). The Teton Range rises 7,000 feet from the valley floor, with its highest peak, known as Grand Teton, soaring above at 13,770 feet amsl.

The project area consists predominantly of agricultural fields that have been planted with hay, small grains, and alfalfa (Figure 4). Uncultivated areas are dominated by grass species including smooth brome (*Bromus inermis*) and cheatgrass, as well as weedy species such as kochia, Russian thistle, wooly mullein, and Canadian thistle. Wetland species such baltic rush (*Juncus balticus*), with a shrub overstory of coyote willow (*Salix exigua*) and arrowleaf cottonwood (*Populus angustifolia*) were also observed along the banks of the Grand Teton Canal (10TN67), which runs north-south along the west survey area boundary.

Figure 4. Overview of survey area, facing southwest (North Wind, August 2020).

The climate in the project area is montane in the broader continental climate type with cooler temperatures and higher precipitation than in lower elevation areas of the region. Summers are short and winters long and cold. Average total precipitation is 15.60 inches per year. The month with the highest precipitation is May with 1.85 inches, with June a close second at 1.84 inches. Average annual total snowfall for Driggs is 63.30 inches. The average minimum temperature in January is 6.5° F, with an average maximum temperature of 29.7° F. The average maximum temperature occurs in July at 81.1° F, with an average minimum temperature of 46.2° F (Western Regional Climate Center 2020).

Soils are mostly Alpine-Driggs complex soils, which are well drained gravelly loams formed from alluvium in 0 to 2 percent slopes, and Alpine-St. Anthony complex soils, which are much the same (Web Soil Survey 2020).

Cultural Setting

This section briefly describes and summarizes the prehistoric, ethnohistoric, and historic cultural context of the survey area. Each broad time period is discussed separately below.

Early Pre-contact Period

The Early Prehistoric period is characterized by Clovis and Folsom spear points. The Clovis sub-period represents a period of presumed big game hunting associated with extinct mammoth (*Mammuthus spp.*), horse (*Equus spp.*), and camel (*Camelops spp.*). This sub-period dates between about 12,000 to 11,000 years before present (B.P.) and is predominantly noted by isolated finds and deposits and various caves such as Wilson Butte Cave (Gruhn 1961), Jaguar Cave (Sadek-Kooros 1972), and Kelvin's Cave. None of the caves contained diagnostic materials, but all provide evidence of Clovis/Folsom Age occupations. Jaguar Cave contained the butchered remains of 268 large mountain sheep (*Ovis spp.*) dating between 11,540 and 10,270 years B.P. (Wright and Miller 1980). Very recent revisitation and additional excavation at the Coopers Ferry site on the Lower Salmon River by Dr. Loren Davis and Dave Sisson turned up a cache of Lind Coulee projectile points in what was apparently a pit with good, but somewhat divergent, dates of 11,370 +/- 70 and 12,020 +/-170 years B.P. (uncorrected). It is thought that the former 11,400 date better reflects the time of actual cache burial.

The Folsom sub-period is marked by smaller lanceolate, fluted projectile points found in associations with *Bison antiquus* (Titmus and Woods 1992). Although the lifeway is presumed to be similar to the Clovis occupations, the Folsom presence is more accurately dated between 10,000 and 9,000 years B.P. Like Clovis, it is mostly documented by surface finds; however, the Wasden Site contained a well-dated Folsom occupation (Butler 1978) in association with other tools and mammoth, horse, camel, and bison bones.

Middle Pre-contact Period

The Middle Prehistoric period dates from approximately 7,500 to 1,300 years B.P. On the eastern Snake River Plain, this sub-period is marked by a proliferation of point types. Large side-notched points decrease in frequency and at about 4,000 years B.P. bifurcate-stemmed dart points (e.g., Pinto sloping-shouldered series and the Gatecliff split-stem series) become the dominant styles in this region.

Additionally, large corner-notched forms similar to the Elko series and smaller lanceolate points similar to the Humbolt series appear at this time (Ringe et al. 1988). At the Wahmuza site (Holmer 1986a), very few of the clearly Plains varieties of projectile points were manufactured from volcanic glass, yet all the Great Basin styles were. Both the Pinto sloping-shouldered and the Gatecliff split-stem series occur in this region (Holmer 1986a).

The characteristic projectile technology of this period was the atlatl and dart. Use of the atlatl is inferred from the emergence of bifurcate-stemmed points and large side-notched dart points. The two point styles may represent two versions of the atlatl, one from the Great Basin represented by the bifurcate-stemmed points and one from the Northwestern Plains represented by large side-notched points (Gruhn 1961). On the Snake River Plain, the older of these appears to be the bifurcate-stemmed projectile points.

As a whole, groups dating to the Middle Prehistoric period appear to have practiced fortuitous, broad-spectrum subsistence. While some sites exhibit an emphasis on bison procurement (Butler 1968; Swanson 1972), other sites exhibit a wide range of animal size and taxa or very little animal bone (e.g., Gruhn 1961; Miller 1972). At the Wahmuza site (Holmer 1986a), a hopper mortar base and numerous notched cobbles—that are ethnographically known on the Columbia Plateau to have been used as fishing weights—were recovered. Additionally, a large, obliquely flaked obsidian biface (the Wahmuza lanceolate), originally defined as a knife but subsequently demonstrated to be a spear point (Woods 1986), was recovered from the component dating to this period and all subsequent periods at the Wahmuza site.

Late Pre-contact Period

The Late Prehistoric I sub-period extends from approximately 1,200 years B.P. to approximately 700 years B.P., and the Late Prehistoric II sub-period extends from about 700 years B.P. to about 150 years B.P. (Ringe et al. 1988).

The Late Prehistoric I sub-period is marked by a reduction in size of corner-notched projectile points to small corner-notched varieties such as the Rosespring and Eastgate points (Ringe et al. 1988). These projectile points are associated with bow and arrow technology. Additionally, ceramics occur sporadically during this sub-period.

The Late Prehistoric I sub-period includes Occupations III and IV at the Wahmuza site (Holmer 1986b). During these occupations, diet appears to have been similar to the preceding Middle Prehistoric III sub-period, although bison apparently were not utilized at this site. Additionally, both small and large corner-notched points were coeval during this sub-period, as well as equal in frequency, although the Desert Side-notched, general variety constituted a quarter of the assemblage. Both the Wahmuza lanceolate and the notched cobbles persist into this period. Near Kemmerer, Wyoming, this sub-period is characterized by repeated occupations of the same site localities, use of cylindrical basin features, utilization of a wider spectrum of animal species, and distinctive ornamental artifact types such as bone tubes and disk beads (McNees et al. 1993). Many of these cultural elements occur as part of the material culture of the historic Numic people (Steward and Wheeler-Voeglin 1941; Jimenez 1986; Reed 1986; Holmer 1994).

The Late Prehistoric II sub-period occurs from approximately 700 years B.P. to about 150 years B.P. (Ringe et al. 1988). Small side- and tri-notch projectile points similar to the Desert Side-notched series

characterize this sub-period. Prehistoric pottery is also fairly common, and horses and European trade goods may have been introduced into the area as recently as 300 years B.P. At the Wahmuza site (Holmer 1986b) Occupations V and VI date to this sub-period. Occupation V contained the majority of a flat-bottomed Intermountain ware pot in association with Desert Side-notched points, General and Sierra Varieties. This sub-period is also typified by a subsistence strategy heavily focused on the procurement of large animals. Conversely, evidence of plant or plant processing during this period is rare. It is unknown whether this pattern reflects a genuine lack of emphasis on the exploitation of plant resources, exploitation of different plant resources, different spatial organization of camp and procurement/processing areas, or season of occupation.

Ethnohistory

Following Lamb's (1958) linguistic model, the Shoshone have occupied the region for approximately 600 years. The Shoshone belong to the Numic-speaking branch of the Uto-Aztecan language family (Miller 1986). However, utilizing the direct historical approach, Holmer (1994) has demonstrated a continuity of cultural elements that extends back approximately 4,000 years, and Swanson (1972), utilizing the same approach, indicates that the Shoshone may have inhabited the regions for approximately 8000 years. Historically, the Shoshone have been reported as far east as the Black Hills of South Dakota in 1743 (Verendrye 1925).

Prior to the acquisition of the horse (ca. A.D. 1700), the Shoshone lifeway appears to have consisted of groups composed of highly mobile nuclear families or family clusters, egalitarian in nature, which practiced adventitious, wide-spectrum, subsistence. The general subsistence pattern consisted of seasonal rounds to areas of resources. Spring and summer were characterized by hunting, fishing, and gathering, while autumn was characterized by a move to the mountain ranges for pinyon nut, other pine nuts, and in some areas, acorns. Winter was spent at various camps along drainages. These foodstuffs were preserved by drying if they consisted of fish or meat, or by roasting if they consisted of nuts, then cached for use during the winter. Fish were primarily exploited in the spring, when the stores of bison meat were running low (Shimkin 1947). After acquisition of the horse, resources were more efficiently exploited, and loosely cohesive bands were formed (Steward 1955).

The groups that utilized the area around the Big Lost River were the Northern Shoshone, which inhabited primarily southern Idaho and the area west of the continental divide. Sometime after acquisition of the horse by the Northern Shoshone, another group of Numic speakers, the Northern Paiute, joined the Northern Shoshone. The Northern Paiute are called the "Bannock" in ethnographic and ethnohistoric literature (Steward 1938). Aside from linguistic differences, this group was assimilated by the Northern Shoshone insofar as the manifestations of culture and technology.

After the acquisition of the horse, the Northern Shoshone traveled onto the Plains and expanded their territory to the Plains of Saskatchewan and east to the upper Missouri River (Secoy 1953). Although several investigators state that after the acquisition of the horse, the Shoshone developed many of the Plains traits based on equestrian mobility and mounted bison procurement (e.g., Malouf 1974), the diffusion of these traits was more likely west to east as the Shoshone acquired horses a generation earlier that the "classic" Plains tribes (Haines 1938; Ewers 1955). Therefore, it seems more likely that the Shoshone developed the aforementioned classic traits and that they were assimilated by the tribes indigenous to the Plains.

Historic Period

In 1808, mountain man John Colter became the first Anglo-American explorer to visit the Teton Valley of present-day southeastern Idaho. Colter's favorable reports of the Valley attracted other fur trappers, and the region gained a reputation as a lucrative hunting ground for beaver in the early part of the nineteenth century (Schwantes 1991). In 1818, local trappers informally named the Valley "Pierre's Hole" after well-known trapper Pierre Tavanitagon (Green 1974). In 1829 and 1832, Pierre's Hole was selected as the site for the annual mountain man rendezvous, in which hundreds of fur trappers, Native Americans, and fur company traders met to exchange furs and supplies. Following the 1832 rendezvous, a battle occurred at Pierre's Hole between a group of Gros Ventres and American trappers accompanied by their Nez Perce and Flathead allies (Lemmers 1983). The Battle of Pierre's Hole resulted in casualties on both sides and marked the end of large-scale Euro-American contact with the Teton Valley for several decades (Green 1974). In the 1840s, the Teton Valley's abandonment was accelerated by the decline in the North American fur trade.

During this period, the Teton Valley was traversed by Native Americans and small groups of missionaries on their way to the Oregon Country. In 1840, Father Pierre-Jean De Smet claimed to have baptized 600 Native Americans while passing through the Pierre's Hole area (Green 1974). In 1862, President Abraham Lincoln requested that Utah Governor Brigham Young raise an army to protect the telegraph and mail near Independence Rock, Wyoming. Young's army, led by Lot Smith, passed through Pierre's Hole and reported back about the area's abundant wildlife and rich meadows (Green 1974). In 1863, a group of miners led by Walter W. DeLacy prospected through the Valley on the way to Jackson Hole, and in 1873 a survey party for the U.S. Geological Survey explored the Teton Valley on behalf of the United States government (Driggs 1926).

Despite these exploratory efforts, sustained settlement in the Teton Valley did not occur until the early 1880s (Hilbert 2005). A major deterrent to permanent settlement was the region's remote location, as well as the uncertainty of the area's political boundaries. For example, the region surrounding Pierre's Hole was originally part of Oneida County. In order to conduct county business, residents of Pierre's Hole were forced to travel over 180 miles to the county seat at Malad City (Green 1974). The burden of traveling great distances to the county seat was not remedied until 1915, when Teton County was formed. Additionally, the Valley's isolation led to a reputation for harboring horse thieves and other criminal enterprises that further discouraged settlement in the region (Driggs 1926).

The Valley's grasslands ultimately proved attractive to prospective farmers, however, and in 1882, the family of Hyrum C. Lapham became the first permanent settlers of Pierre's Hole (Driggs 1926). The Lapham family operated a cattle ranch utilizing the Valley's abundant natural pasture. They were soon joined by several other families, including the Hubbards, Hibbards, Lyons, and Watermans (Green 1974). By 1887, 70 people resided in the Teton Valley. Of this group, 58 were stockmen, three were trappers, and three were outlaws (Green 1974). By 1888, settlement had increased to include two large groups of Mormon settlers from Utah. Among the first group of Mormon settlers were members of the Driggs family, for whom the community of Driggs was named. In the 1890s, settlement of the region accelerated rapidly, and by the end of the nineteenth century most of the usable land in the Teton Valley had been claimed by homesteaders (Figure 5) (Green 1974).

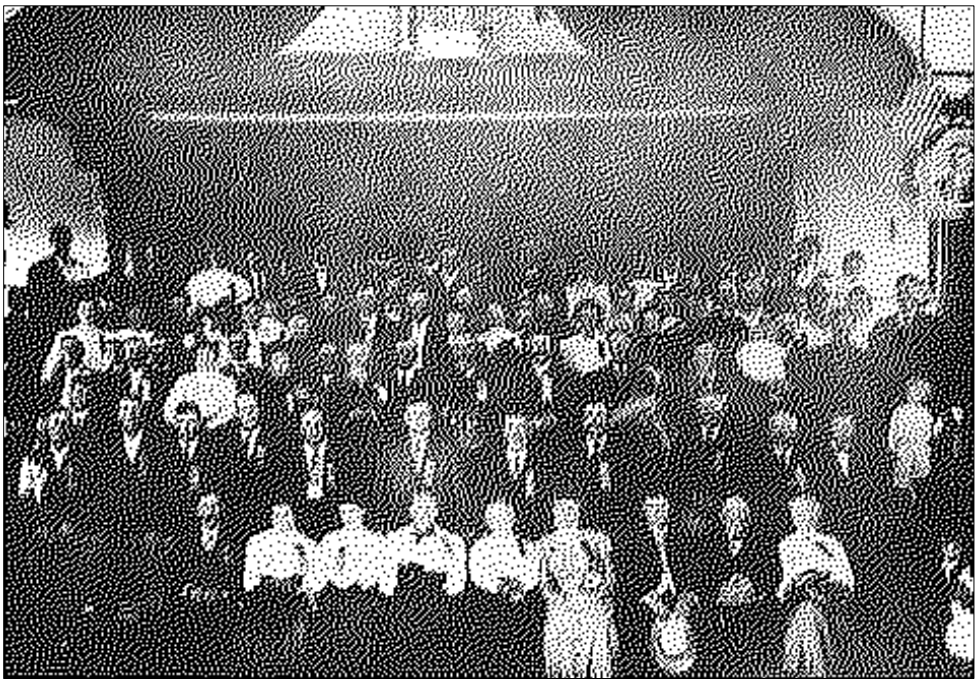

Figure 5. Photograph of Teton Valley pioneers at reunion, ca. 1913 (Photograph courtesy of Brigham Young University-Idaho, David O McKay Library, Archive and Special Collections).

The settlers immediately set about developing the Valley's agricultural potential. In 1890, the first irrigation canals were constructed by Henry Douglas and John Todd near Darby Creek (Driggs 1926). The Teton Valley's natural meadows provided an abundance of hay for stock raising, which quickly became the region's most profitable industry. Early pioneers erected log cabins and planted small vegetable gardens to supply their families with fresh produce (Green 1974). By the 1890s, sawmills had been established at Teton Canyon and Bitch Creek, and milled lumber replaced logs as the most common material for home construction (Green 1974). In 1893, the family of Samuel Kunz established the first cheese making factory in the area, and the dairy industry grew into a powerful economic force in the region (Driggs 1926).

By the turn of the twentieth century, the entire Teton Valley was dotted with small farms and villages. The largest of these settlements were Tetonia, Victor, and Driggs. Driggs is located in the central portion of the Valley and is surrounded by the four smaller communities of Bates, Alta, Sam, and Darby (Green 1974). The Driggs area was first settled in 1888 by Mormon settlers from Salt Lake City. They situated their settlement, which was originally referred to by the *Deseret News* as "Pine Arbor," on the eastern edge of the swamp near Teton Creek (Green 1974). Among the first homesteaders in the area were the family of D. C. and Leland Driggs, who arrived in the Teton Valley from Salt Lake City, Utah in 1888. By 1889, the community boasted a store, three cabins, a tent, and several covered wagons, nearly all of which were located on the Driggs' property (Moss n.d.). The town's name was changed to Driggs when a post office was established there in 1891 (Green 1974). D. C. Driggs served as the first postmaster. By 1897, the community consisted of 16 blocks, with four north-south running streets (Moss n.d.). In 1909, the family of Henry Wallace donated 160 acres to the town of Driggs for the development of the Driggs townsite. The Wallace's land was located in the southeast quarter of Section 26, just northeast of the Driggs parcel. Wallace's tract was laid out in 25 blocks, each containing four acres. North-south streets

in the townsite were numbered, and east-west streets were named for members of the Wallace family (Green 1974). The Driggs townsite was officially dedicated in December 1909.

During this time, the growth of the Teton Valley was constrained by its remote location, which made it difficult to transport produce and livestock to railroad shipping points for distribution to larger markets. Beginning in the early twentieth century, the Oregon Short Line Railroad, a subsidiary of the Union Pacific, began construction on a rail line connecting the communities of Ashton, Drummond, Lamont, Tetonia, Driggs, and Victor (Green 1974). The rail line brought increased prosperity to the region and facilitated the growth of Valley communities. The city of Driggs was incorporated in May 1910 in anticipation of the railroad's arrival. The railroad reached Driggs on August 27, 1912. Around the same time, an electric light system was installed after the completion of the Teton Valley Power and Milling Company's power plant at Teton Canyon, and a water distribution system was constructed (Green 1974). By the end of 1912, Driggs was home to two general stores and two blacksmith shops, a newspaper, bank, high school, church, drug store, photography studio, and dance hall (Figure 6) (Green 1974).

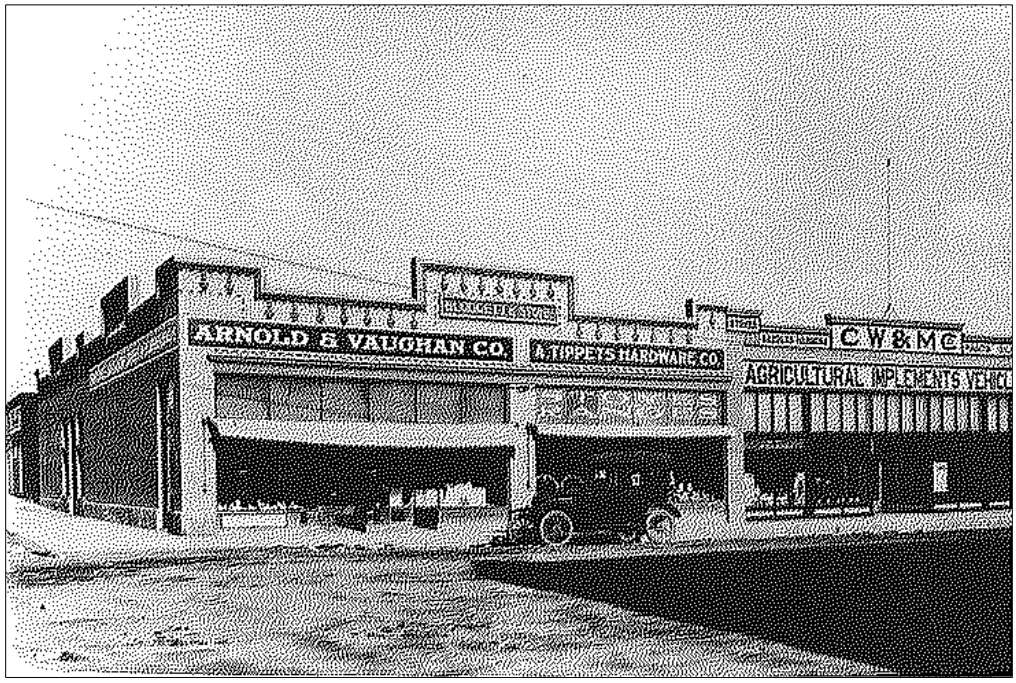

Figure 6. Main Street in Driggs, Idaho, ca. 1920 (Photograph courtesy of Brigham Young University-Idaho, David O McKay Library, Archive and Special Collections).

The introduction of the railroad brought population increases to the Teton Valley and created new opportunities to diversify the local economy. A brief coal mining boom occurred in 1911–1912, and during the 1920s oil exploration was attempted near the mouth of Horseshoe Canyon (Driggs 1926). However, the railroad also brought outside competition into the Valley that had an overall negative impact on local businesses. Ultimately, increased competition, high cost, lack of an adequate work force, and low demand forced many local industries to shut down (Green 1974).

The population of the Teton Valley reached its peak by 1940. After that time, limited agricultural space, loss of natural resources, and outside competition led to population decreases in the Valley (Green

1974). Beginning in the 1960s, local leaders turned to tourism in an attempt to revitalize the Valley's economy and attract new residents. Local officials were inspired by the success of nearby communities, such as Jackson Hole, that had established reputations as resort destinations for recreational skiers. Additionally, they hoped to capitalize on the proximity of the Teton Valley to Grand Teton National Park, which was established in northwestern Wyoming in 1929. After many years, the Grand Targhee Ski Resort was completed in the Teton Valley in 1969 (Green 1974). Construction of the resort was financed in part by Targhee Resorts Inc., a group comprised of more than 200 private investors who resided in the Teton Valley (*Jackson Hole Guide* 1967). Recreational opportunities continue to attract thousands of people to the Teton Valley each year, and tourism remains a driving force in the region's local economy.

Developmental History of Driggs-Reed Memorial Airport

The Driggs-Reed Memorial Airport was originally opened in 1947. In the 1940s, as the area's population began to decline, the Rotary Club of Driggs and the Driggs City Council advocated for the construction of a municipal airport to encourage regional growth (*Teton Valley News* 1946). The airport was intended to accommodate planes for visiting sportsmen, fishermen, and hunters in the Teton Valley, and to provide a safe landing area for Forest Service planes in case of a forest fire. In 1946, State Director of Aeronautics for the Civilian Aeronautics Administration (CAA) Chet Moulton visited a potential airport site north of Driggs and gave his official approval of the project (*Teton Valley News* 1946). The site was located immediately north of Teton High School on agricultural land owned by Vandus (Vandes) A. Price and L. C. Hatch (*Teton Valley News* 1946). Price was a local rancher and owner of the Price Mercantile Company in Driggs (*Teton Valley News* 1953). The men sold a right-of-way, which measured 300 feet wide by 3,550 feet long, along with additional space for airplane hangars and car parking, to the City of Driggs in August of 1946 (*Teton Valley News* 1946). The airport's approval by the CAA meant that matching funds from state and federal authorities would be available to defray the cost of the airport's construction.

In January 1947, the federal government provided $8,739 for the construction of the airport (*Post-Register* 1947a). Initial construction consisted of leveling off the site and seeding it to native grass, which was recommended by Director Moulton as the most practical and economical airport type for the region (*Teton Valley News* 1946). By May 1947, the airport consisted of a grass strip runway, measuring 3250 feet long by 300 feet wide, with power and telephone lines installed at the southwest end of the airfield. At that time. the Driggs airport was officially designated for public use on a temporary permit pending further construction and hazard removal (*Post-Register* 1947b). Leveling and grading operations continued until late1949 when the airport received official approval from the CAA (*Post-Register* 1949).

Only minor improvements were performed at the Driggs municipal airport during the 1950s and early 1960s. In 1952, Don Choules, chairman of the airport's board of trustees, announced that a wind circle would be constructed to help pilots determine which way the wind was blowing prior to landing. The circle, no longer extant, was intended to resemble the face of a clock with a windsock located in the center and different colors denoting each section of the circle (*Teton Valley News* 1952). By 1962, the airport was still unlighted and was not staffed full time. Consequently, by the early 1960s, the Driggs Airport was only lightly used and periodic acts of vandalism were known to occur there (*Teton Valley News* 1962).

By the mid-1960s, plans to construct the Grand Targhee Ski Resort were already well underway and local officials planned to expand the Driggs Airport to accommodate an anticipated influx of tourist traffic into the Teton Valley. In 1964, the Teton County Re-Development Committee announced plans to extend the airport's runway to one mile, and to have the facility declared an alternative to the airport in the nearby town of Jackson Hole (*Teton Valley News* 1964). In 1965, it was announced that the airport's runway would be extended an additional 2,400 feet, which would allow planes of almost any size to land in Driggs (*Teton Valley News* 1965). Twenty acres of land for the extension was purchased from L. P. Hatch. The runway extension program was spearheaded by the Driggs Rotary Club. Teton County pledged $4,000 for the runway's extension, while the City of Driggs pledged $500, and the Idaho Department of Aeronautics pledged $1,000, with the balance of the project's cost provided by individual pledges (*Teton Valley News* 1965). Following the extension, the runway measured 5,800 feet in length (*Teton Valley News* 1974).

By 1966, additional airport improvements were proposed to make the property more secure, including the construction of a permanent manager's residence, phone, lights, a rest room, and carport on the grounds (*Teton Valley News* 1966). However, it appears that these improvements were never completed as a 1973 aerial photograph of the airport shows only one building present at the site (Figure 7). The building served as a hangar facility and was constructed in 1973 using funding from a federal grant distributed by the Economic Development Administration (*Teton Valley News* 1973). By 1973, two full-time operators were located at the Driggs Airport. The airport's manager Raymond Dean operated Dean's Flying Service, which was mostly a crop-dusting operation, and Fred Reed operated a charter service, known as Teton Aviation (*Teton Valley News* 1973).

Figure 7. Aerial Photograph of Driggs Airport, 1973 (Photograph courtesy of EDRnet.com).

By the mid-1970s, local authorities again proposed to expand the Driggs Airport to keep up with the region's growing tourism industry. Paving the airport's runway was considered a top priority (*Teton Valley*

News 1974). Officials argued that muddy conditions in March and April rendered the airport unusable and the only way to attract year-round tourism was to pave the airport's runway. Members of the Driggs Chamber of Commerce published an appeal to the community in the *Teton Valley News* stating, "It is essential that we increase the accessibility of our area if we are to maintain the growth in recreational-oriented business, and improvement of the airport is one of the most important steps in this direction" (*Teton Valley News* 1974). The Driggs Chamber of Commerce received $282,000 from state and federal officials to complete the Driggs Airport Improvement Project. An additional $6,000 was raised through donations from community members (*Teton Valley News* 1974). The effort to pave the runway was led by Fred Reed, who by 1975 was acting as the airport's manager.

In 1975, 5,200 feet of the existing turf runway at the Driggs Airport had been paved with asphalt. Additionally, a 300-foot-long by 121-foot-wide ramp that could accommodate nine aircraft tiedowns had also been constructed (*Jackson Hole News* 1975). The airport also boasted a modern hanger terminal building that could accommodate eight planes with a public reception area and restrooms (*Jackson Hole News* 1975). The Red Baron Flying Service, another company managed by Fred Reed, had taken over as the fixed base operator (FBO) at the airport. The Red Baron Flying Service was owned by Ed Browning Jr. of Idaho Falls. Reed and his wife, Linda, handled the flight service and managed the Driggs branch of the operation (*Jackson Hole News* 1975). Projected improvements for 1976 included the installation of a complete lighting system, and a non-precision instrument approach system (*Jackson Hole News* 1975). Following these improvements, the airport was officially re-dedicated as the Teton Peaks-Driggs Municipal Airport. In 1977, the airport won the Federal Aviation Administration (FAA) Northwest Region airport beautification award (*Times-News* 1977).

Beginning in the 1980s, the Driggs Airport began to struggle financially due to the unpredictability of its funding, and the high maintenance costs associated with its operations (*Teton Valley News* 1984). In 1984, citing a lack of community support, Fred Reed started Western Air Research Inc., a wildlife tracking and telemetry service, and stopped managing the daily operations at the airport (*Teton Valley News* 1984). In May 1989, the Driggs Airport was awarded a $5,000 grant for runway repairs by the Idaho Bureau of Aeronautics. The City of Driggs was expected to match the grant amount. While the repair project was much needed, airport officials had been postponing repairs in hopes of being awarded a much larger grant for a significant airport expansion project (*Teton Valley News* 1989).

After many years of struggling financially, in 1991, the Teton Peaks-Driggs Municipal Airport was finally awarded a $949,500 grant for much needed airport improvements (*Teton Valley News* 1991). The grant was administered by the U.S. Department of Transportation and was intended to pay 90 percent of the costs of rehabilitating and expanding the airport. The improvement project included expanding the runway from 5,200 to 7,300 feet, adding a full-length taxiway, acquiring more land, and enlarging the parking apron area (*Teton Valley News* 1991a). The remaining $105,000 needed to complete the project was provided by the state and city. Most of the project was completed by November 1991 (*Teton Valley News* 1991b). Other than the construction of additional hangars, the airport's overall design has changed very little since the early 1990s. Fred Reed died in an airplane crash in 1995 while on a wildlife tracking mission for Western Air Research (*Teton Valley News* 1995a). The airport was subsequently renamed the Driggs-Reed Memorial Airport in his honor. At the time, airport board members noted that, "If it wasn't for Fred Reed, we might have an airport, but it wouldn't be the one we have today" (Teton Valley News 1995b).

In 1996, the Driggs-Reed Memorial Airport was awarded a grant to develop its first long-range comprehensive plan (*Teton Valley News* 1996a). That same year, Teton Aviation took over as the only FBO at the airfield (Teton Valley News 1996b). The company extensively remodeled the FBO hangar including adding a new 60' x 16' door, re-insulating the interior, and removing existing skylights. Beginning in 2008, a large-scale renovation of the Driggs-Reed Airport was proposed to upgrade the facility from a B-II to a C-II facility, which could accommodate commercial air traffic (*Teton Valley News* 2008). In 2009, the American Recovery and Reinvestment Act awarded $3.6 million to the Driggs-Reed Memorial Airport for new runway construction (*Times-News* 2009). The runway was completely renovated in 2009, which included excavation and leveling to remove a 5-foot "hump" in the middle that had been there since the 1940s (*Teton Valley News* 2009). Additionally, the runway was widened by 25 feet to accommodate larger aircraft (*Teton Valley News* 2009). The total cost for the runway upgrades was about $7 million, which was mostly provided through FAA grants. By 2014, general manager Peter Kline called the Driggs-Reed Memorial Airport, "…the finest little airport in the west" (*Teton Valley News* 2014).

The Driggs-Reed Memorial Airport remains in use today and continues to serve a variety of aircraft, including single- and multi-engine airplanes, turboprops, and small jets. It remains owned and operated by the City of Driggs, with Teton Aviation serving as the only FBO on the airfield. Administrative functions of the facility are overseen by a six-member board, which is also responsible for formulating recommendations regarding the airport's policies and directions and transmitting those recommendations to the City staff for final action. As the property continues to support a variety of aviation uses and activities, it has undergone numerous renovations in recent years. While these projects have improved the overall condition and safety of the airport, they have resulted in the demolition, replacement, and alteration of many of the property's original buildings and structures. Of the 41 buildings and structures that currently comprise the facility, only one, the runway, dates to the original construction of the airport. The remaining resources were constructed on the property between 1973 and 2017.

Pre-Field Research

Archaeological and built environment site files and inventory reports were checked at the Idaho State Historic Preservation Office (SHPO) before the field survey (Idaho SHPO Records Search No. 20448; August 18, 2020). North Wind also reviewed the National Register Information System database, and Bureau of Land Management (BLM) maps and title plats electronically. The parameters of the records search included the survey area and the surrounding one-mile radius.

The original General Land Office (GLO) maps for Township 5 North (T5N), Range 45 East (R45E) (plat no. 43428, filed 12/18/1891) and Township 5 North (T5N), Range 46 East (R46E) (plat no. 43250, filed December 9, 1898) show two cultural features within the APE. Two GLO roads are depicted paralleling each other and running east-west through the current location of the Driggs-Reed Memorial Airport runway. Due to modern development these features are no longer extant.

The Idaho Records Search (No. 20448) indicates that 16 CRIs were conducted within the one-mile search radius. Only one of these—the 2014 CRI completed by Schlegel and Shelton—included acreage within

the current project area. The 16 surveys range from a single acre to 960 acres, with the majority conducted for road improvement projects or municipal developments.

Previous Cultural Resources Studies

Report Number	Report Date	Report Title	Report Author(s)
1994/510	1994	Driggs Water & Wastewater System Improvement, Targhee National Forest.	Willingham, C.
1999/103	1998	Idaho Forest Highway 76 and Wyoming Forest Highway 76, Targhee N.F.	Berryman, J.
1989/2149	1988	PSR, Nickerson Bridge In-51. Idaho Transportation Department.	Gaston, J.
2001/549	2001	SH-31, Pine Creek Summit to SH 33: DHB Aggregate Source. Idaho Transportation Department.	Crockett, S.
2007/576	2006	Packsaddle Rd., Phase I, Teton County.	Shelton, J.
2008/237	2002	Highway 33, M.P. 133 to Wyoming State Line. Frontier Historical Consultants, Grandview, ID.	Gray, D.
2011/307	2010	Walter Ready Mix Gravel Pit, Crockett, Victor, Idaho, ITD.	Crockett, S.
1989/7859	1987	Agricultural Landscapes Survey. Prepared by Idaho State Historical Society. IHSI Survey #104.	Attebery, J.
1995/1010	1995	Lowell Curtis Irrigation Pipeline and Canal. Frank Fink, SCS Boise.	Fink, F.
2000/913	2000	Class III Cultural Resource Inventory of Lot 3 Block II Valley Centre Housing Development in Driggs, Teton County, Idaho.	Crockett, S.
2001/863	2001	Lots 4 & 5, Block II, Valley Centre Subdivision.	Crockett, S.
2002/484	2002	City of Driggs Springs Redevelopment and Waterline, Teton County, Idaho.	Crockett, S.

2009/538	2009	Friends of the Teton River (FTR) Teton Creek Restoration.	Crockett, S.
2014/600	2014	Driggs-Reed Memorial Airport Expansion, City of Driggs, Idaho.	Schlegel, T. & J. Shelton
2017/416	2017	Cultural Resource Inventory and Visual Impact Assessment for the ID6 Clawson Communication Facility, Teton County, Idaho. Cannon Heritage Consultants, Inc.	Peart, J., S. Crockett, M. Boyle, K. Cannon, & R. Sladek
2018/663	2018	The Teton Creek Farm (Green) Restoration Project, Teton County, Idaho.	Martin, H., M. Boyle, & K. Cannon

Table 1. Previous Cultural Resources Studies

Expected Cultural Resources

A total of four previously recorded resources are located within one mile of the project area. The resources include one prehistoric site, an industrial complex, a canal, and a water pipeline. Two of the sites have been determined ineligible for listing in the NRHP. The eligible sites include the Driggs Idaho Water Pipeline (IHSI No. 10TN66) and the Grand Teton Canal (IHSI No. 10TN67). Of the two eligible sites, only the Grand Teton Canal (IHSI No. 10TN67) is located within the current project area. The other eligible site, the Driggs Idaho Water Pipeline, is located approximately 2,900 feet southeast (0.55 mile) of the survey area at the closest point.

Field Methodology

The Class III CRI and architectural survey was conducted by Greta Rayle, M.A., RPA and Kasey Fulwood, M.A., on August 24, 2020. Both Ms. Rayle and Ms. Fulwood meet the Secretary of the Interior's Professional Qualification Standards for Archaeology, Architectural History, and History. At the time of the survey, much of the northern portion of the project area was under cultivation; thus, only 54.25 acres of the 240 acres of agricultural fields to the north of the airport's runway system was surveyed for cultural resources (Figure 8). Additionally, the 90 acres previously surveyed by Schlegel and Shelton in 2014 were not resurveyed as part of the current project (see Figure 8). The remaining 149.55 acres within the project area was surveyed in parallel transects spaced at no more than 30 meters (m) apart. Rodent burrows were examined for evidence of subsurface archaeological deposits. If artifacts or features were observed, they were pinflagged and the area surrounding the find was intensively examined for additional artifacts and features.

Per Idaho SHPO, a site is defined as an area consisting of any feature along or in association with other features (e.g., cairns, stone rings) or five or more artifacts situated in a discrete location within 50 m of

Map Redacted

Figure 8. Cultural Resource Survey Map.

each other and/or artifacts and features located more than 100 m from each other but in obvious association. An isolate is defined as fewer than five artifacts in a 10-m by 10-m area, or re-deposited materials that lack significant context, with no other associated artifacts or features within a 30-m radius of the location. The distinction between a site and an isolated find was made based on the Principal Investigator's judgment; if it was determined that an area consisting of less than five artifacts represented a significant event, or if unusual artifacts, materials or features were identified, then the area was defined as a site. For example, the identification of lithic material not generally found in the survey area or vicinity would be classified as a site.

The project area was recorded using a Trimble Geo-XT Global Positioning System (GPS) set to NAD 83, Zone 11 and installed with North Wind's cultural resources data dictionary which is tied to a GIS legends file.

All cultural resources identified within the project area were evaluated for listing in the NRHP in accordance with 36 CFR 60.4. Criteria of eligibility for inclusion in the NRHP are as follows:

> The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:
>
> A) that are associated with events that have made a significant contribution to the broad patterns of our history; or
>
> B) that are associated with lives of persons significant in our past; or
>
> C) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
>
> D) that has yielded, or may be likely to yield, information important in prehistory or history.

NRHP-eligible historic properties must be deemed significant under one or more of the above criteria and possess significant integrity of location, design, setting, materials, workmanship, feeling, and association.

NRHP-eligible historic properties are classified into one of five different property types: object, site, structure, building, and historic district. A historic district is defined as: "a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development." Historic districts may consist of contributing and non-contributing objects, sites, structures, and buildings. The properties within a district are linked thematically by either architectural style, designer, date of development, distinctive urban plan, and/or historic associations.

During the architectural survey, a total of 41 resources, constructed at various times between 1947 and 2017, were recorded. Only one resource, the runway, is historic in age. All of the resources are associated with the property's current use as a City-owned and operated airfield; therefore, North Wind evaulated the existing Driggs-Reed Memorial Airport as a historic district. The period of significance for the district has been identified as beginning in 1947, corresponding to the initial construction of the runway, and ending in 1965, the year in which the runway was extended to accommodate larger planes and an increase in tourist traffic into the Teton Valley. Additionally, the runway was evaluated

individually as the only extant historic-age resource to assess whether it had standalone significance and integrity, which would make it individually eligible for NRHP listing.

The purpose of the architectural survey was to identify and document all standing buildings and structures in order to evaluate the airport for listing in the NRHP pursuant to Idaho SHPO standards. Built elements identified at the airport were assigned a field identification number (FN), point-provenienced using a Garmin GPSMap 76 unit (allowing for 3-m to 5-m accuracy), photographed, and recorded on field forms.

The information collected during the architectural survey was used to complete an Idaho State Historic Inventory Form (IHSI) form for the entire airport property, which included descriptions of the airport's 41 documented resources. A separate form was also prepared for the Grand Teton Canal (10TN67)—a previously recorded irrigation canal that has been determined eligible for listing in the NRHP under Criterion A on the local level of significance for its association with early settlement and agriculture of the Teton Valley (Crockett 2002). Additionally, a separate form was completed for the newly recorded Driggs-Reed Memorial Airport runway—a 7,300 feet long asphalt runway which was originally constructed in 1947.

Results

All Recorded Sites

Site Number	Site Type	NR Eligibility	Project Effect
10TN67 (Grand Teton Canal)	Feature (Irrigation)	Eligible	Adverse Effect
NRD-1 (Driggs-Reed Memorial Airport)	Historic Property	Not eligible	No effect
FN-35 (Runway)	Historic Property	Not eligible	No effect

Table 2. All Sites Recorded for This Investigation Within APE

The Class III CRI and architectural history survey of the survey area resulted in the identification of one previously recorded site—Grand Teton Canal (IHSI 10TN67) and two newly recorded historic properties—the Driggs-Reed Memorial Airport (NRD-1) and runway (FN-35).

Previously Recorded Site

Grand Teton Canal (IHSI No. 10TN67)

The Grand Teton Canal (IHSI No. 10TN67) is an approximately 6-mile–long unlined earthen canal that provides irrigation water to agricultural land in the Teton Valley. The approximately 10-foot-wide by 5-

foot-deep canal originates at a wood and concrete head gate on Teton Creek in Alta, Wyoming. It continues west across the state line into Idaho where it is diverted into three major laterals to the north,

west, and southwest. Construction on the Grand Teton Canal began around 1888, prior to the establishment of an official water claim in 1892. The initial water appropriation for the canal was 1281 cubic feet per second (CFS). The water appropriation was expanded by an additional 29.28 CFS in 1916.

The Grand Teton Canal was originally recorded by S. Crockett in 2002. At that time, Crockett recommended the canal eligible for listing in the NRHP under Criterion A for its association with the early settlement and establishment of agriculture in the Teton Valley.

Within the project area, the Grand Teton Canal (10TN67) consists of one previously recorded segment measuring approximately 0.72 miles long, which runs east-west along the southern boundary of the project area, and three lateral irrigation ditches connected to the Grand Teton Canal. The interconnected irrigation ditches transect the project area at various locations.

The first lateral ditch flows north-south along the eastern boundary of the project area for approximately 0.4 miles. The second lateral flows east to west for approximately one mile, dividing the agricultural fields; while the third ditch runs along the southern project boundary, paralleling the previously recorded segment of the Grand Teton Canal (10TN67), for approximately one mile. The open water channel of the first lateral measures approximately 10 feet wide. The second and third lateral each measure approximately 6 feet wide. The channels of all three lateral ditches measure between 1- and 5-feet-deep, and have broad unlined, earthen walls. One feature—an approximately 26-foot-long head gate diversion structure (H-1)—crosses over the eastern lateral at the intersection with the second lateral. The diversion structure regulates the flow of water separately to each irrigation ditch within the APE. The feature's head gates are made of wood and are controlled with a metal screw stem and handwheel. The Grand Teton Canal (10TN67) branches northwest to flow into the third lateral ditch which continues along the southern boundary of the project area. The third lateral also joins the Grand Teton Canal (10TN67) in the southeastern corner of the project area. The lateral continues north for approximately 155 feet and then jogs northeast for approximately 930 feet outside of the project area, before reconnecting with the first lateral along the eastern boundary of the project area. The second lateral flows east-west across the agricultural fields and joins the first lateral on the eastern boundary of the project area. While the exact age of the lateral irrigation ditches is not known, all three ditches appear on a 1943 aerial photograph of the project area. The Grand Teton Canal (10TN67) and connected lateral irrigation system is presently still in use and in good condition.

NRHP Eligibility Evaluation

The segment of the Grand Teton Canal (IHSI No.10TN67) and associated ditches within the current project area retain their integrity of workmanship, materials, design, location, and association. The system continues to be used for irrigation and agriculture. The canal's integrity of setting has been compromised with the encroachment of residential development which has replaced agricultural uses with scattered residential subdivisions. However, as the canal retains six aspects of historic integrity, and is still in use for irrigation and agriculture, the segment of the Grand Teton Canal (IHSI No.10TN67) located within the APE is considered a contributing element of the Grand Teton Canal.

Newly Recorded Site

Driggs-Reed Memorial Airport (NRD-1)

The Driggs-Reed Memorial Airport is located within the city limits of Driggs, Idaho in Teton County. The property is situated on the level floor of the Teton Valley approximately one-mile northwest of Teton Creek; it is bounded by State Highway 33 to the west, E 1000 N to the south, and Teton Vista to the north. The property is currently classified by the FAA as a C-II Airport, which can accommodate aircraft with speeds of less than 141 knots and wingspans that do not exceed 79 feet (HDR Engineering, Inc. 2012). It predominantly serves air charter, air taxi, corporate, business, and recreational uses. All the buildings located within the boundaries of the airport are either utilized by the City of Driggs, private pilots, or commercial enterprises for recreational, corporate/business, and emergency-related transport purposes. Teton Aviation currently serves as the only fixed-base operator (FBO) on the airfield, and leases over 20,000 ft^2 of hangar space, as well as an additional 17,000 ft^2 for a restaurant—Warbirds Café—pilot lounge, museum, and meeting rooms.

The Driggs-Reed Memorial Airport property includes 41 resources, only one of which is historic in age (Figure 9 & Figure 10; Table 3). These include an office (FN-1); 33 hangars (FN-2 through FN-34); a runway system consisting of one runway (FN-35); a taxiway system (FN-36); a snow equipment removal (SRE) building (FN-37); a storage shed (FN-38); an industrial park (FN-39); a bicycle shed (FN-40); and a restaurant and museum (FN-41).

The primary public access road for the property is Warbird Lane, a northwest to southeast trending paved road that extends from State Highway 33. The access road travels southeast for approximately 0.2 mile before widening into a parking lot for the Warbirds Café (FN-41). The bicycle shed (FN-40), provided by the Idaho Aviation Association, is in the southeastern corner of the parking lot. Warbird Lane continues past the parking area for approximately 60 feet to terminate at the taxiway system (FN-36). The taxiway parallels the runway (FN-35) on the west. Flying Saddles Road provides secondary access to the southern portion of the property; however, the road is protected by a security gate and is not open to the public. The SRE building (FN-37) and storage shed (FN-38) are located approximately 50 feet east of the security gate. After passing through the gate, Flying Saddles Road branches into a series of unnamed circulation roads that provide access to the interior of the airport, including the airplane hangars and apron. A third unnamed access road extending from State Highway 33 provides access to the office (FN-1) and (FN-2).

DOCUMENTED RESOURCES

A total of 41 resources were identified during the architectural survey of the project area. Except for the runway (FN-35), all of the resources post-date the original construction of the airport. The runway was constructed in 1947. Detailed descriptions of the 41 resources, grouped by type, are presented below.

Figure 9. Driggs-Reed Memorial Airport (NRD-1) map.

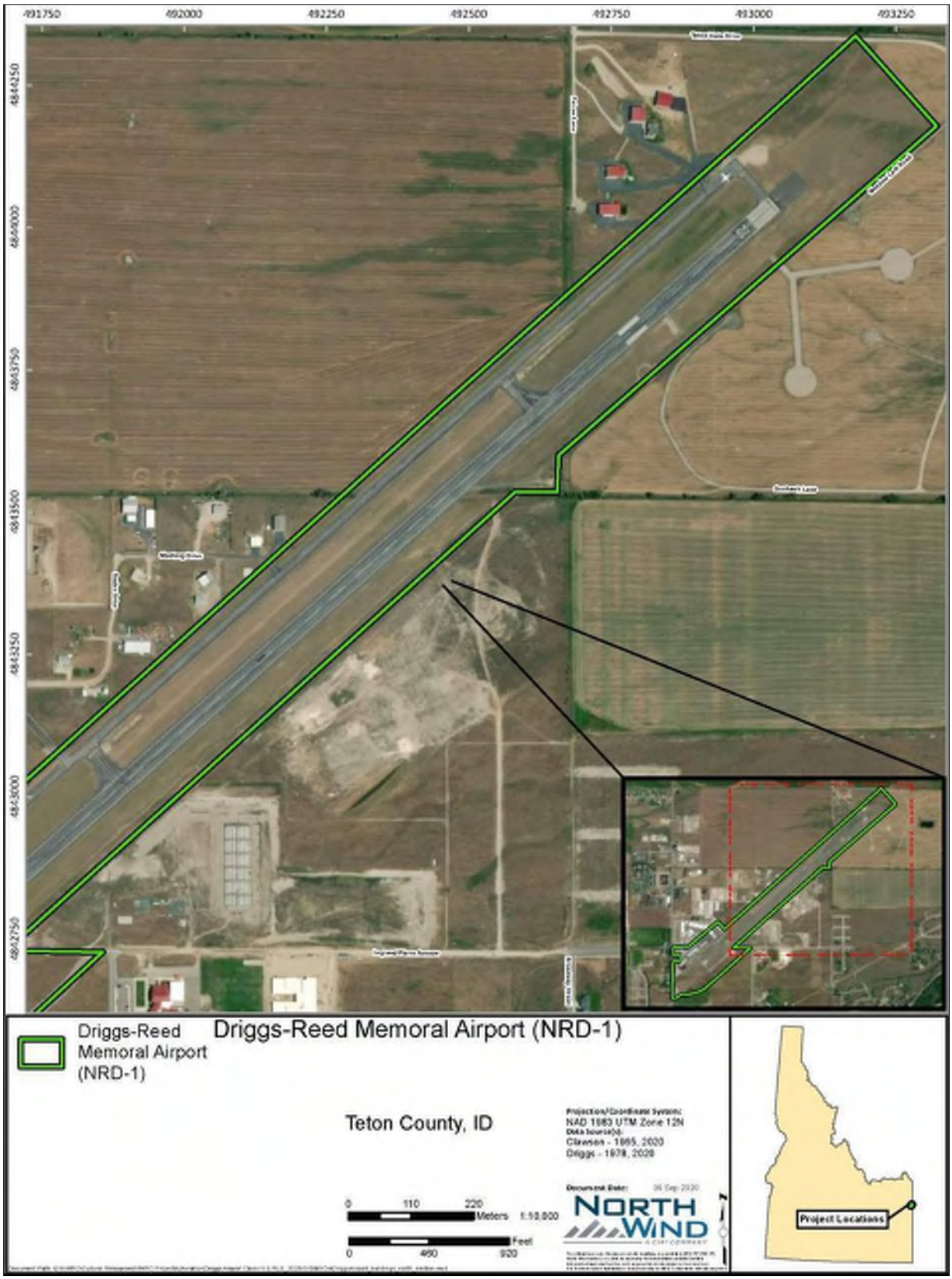

Figure 10. Driggs-Reed Memorial Airport (NRD-1) map.

Field #	Building #	Description	Date of construction
FN-1	0-2	Hangar/Office	1973
FN-2	0-1	Hangar	1980–1994
FN-3	1-1	Hangar	1980–1994
FN-4	1-2	Hangar	1980–1994
FN-5	1-3	Hangar	1980–1994
FN-6	1-4	Hangar	1980–1994
FN-7	1-5	Hangar	1980–1994
FN-8	1-6	Hangar	1980–1994
FN-9	1-7/8	Hangar	1999–2003
FN-10	1-9/10	Hangar	1999–2003
FN-11	1-11	Hangar	1999–2003
FN-12	1-12	Hangar	1999–2003
FN-13	1-13	Hangar	1999–2003
FN-14	2-1	Hangar	1980–1994
FN-15	2-2	Hangar	1980–1994
FN-16	2-3	Hangar	1980–1994
FN-17	2-4/5	Hangar	1994–1999
FN-18	3-1	Hangar	1980–1994
FN-19	3-2	Hangar	1980–1994
FN-20	3-3	Hangar	1980–1994

FN-21	3-4	Hangar	1980–1994
FN-22	3-5	Hangar	1999–2003
FN-23	3-6	Hangar	1994–1999
FN-24	3-6 ½	Hangar	1999–2003
FN-25	3-7	Hangar	1999–2003
FN-26	4-1	Hangar	1999–2003
FN-27	6-1	Hangar	1999–2003
FN-28	6-2	Hangar	1999–2003
FN-29	6-3	Hangar	2004–2009
FN-30	6-4	Hangar	1999–2003
FN-31	7-1	Hangar	1999–2003
FN-32	7-2	Hangar	1999–2003
FN-33	7-3	Hangar	1999–2003
FN-34	7-4	Hangar	1999–2003
FN-35	N/A	Runway	1947
FN-36	N/A	Taxiway	1991
FN-37	N/A	SRE Building	2003–2004
FN-38	N/A	Storage Shed	2003–2004
FN-39	N/A	Driggs Industrial Park	1991
FN-40	N/A	Bicycle Shed	Post-2017

FN-41	N/A	Warbirds Café and Museum	2001–2002

Table 3. Driggs-Reed Memorial Airport (NRD-1) property resources and construction dates.

Office/Hangar (FN-1)

The office (FN-1) is a one-story prefabricated metal building measuring approximately 135 feet long by 75 feet wide. The building is in the southern portion of the Driggs-Reed Memorial Airport, approximately 50 feet northeast of FN-2. A Master Plan produced for the Driggs-Reed Memorial Airport by HDR Engineering, Inc. in 2012 indicates that FN-1 is the only hangar owned by the City of Driggs. All other hangars within the airport boundary are constructed on property leased from the city. The building has a poured concrete foundation and a low-pitched front gable roof. A single metal door is in the center of the west (main) façade. There are four aluminum frame two-lite horizontal sliding windows located on either side of the entrance, as well as three metal vents spaced evenly across the west façade to provide air circulation for the building.

The north façade of the building has a single solid metal door on the northwest portion of the façade and an offset main entrance which is sheltered beneath a gable roof entry porch. There are three aluminum frame horizontal sliding two-lite windows located on the eastern portion of the façade, as well as vinyl two-lite vertical sliding window located between the two doors on the western portion of the façade. The primary entrance on the east (rear) façade of the building is in an enclosed wood frame vestibule with a front gable roof. To the north of the entrance are two horizontal sliding two-lite vinyl windows flanking a central fixed-pane vinyl window. The center of the east façade has three evenly spaced two-lite horizontal sliding windows. Additionally, a garage bay is located on the southern portion of the east façade. The south façade of the building has a single entrance which is sheltered by a gable roof entry porch supported by metal brackets.

FN-1 is in good condition and is currently in use as an office and maintenance building for the Driggs-Reed Memorial Airport. FN-1 first appears on a 1973 historic aerial photograph for the airport property. It was the first hangar building located at the airport and was constructed using grant funding from the Economic Development Administration.

Hangars (FN-2 through F-34)

Of the 41 buildings and structures located within the Driggs-Reed Memorial Airport property, 33 are single-story, prefabricated steel box-style hangars. All the hangars have concrete foundations and front-gabled metal roofs.

Nineteen hangars (FN-3, FN-4, FN-5, FN-6, FN-7, FN-8, FN-9, FN-14, FN-15, FN-16, FN-17, FN-18, FN-19, FN-20, FN-21, FN-22, FN-23, FN-24, and FN-25) are located west of the taxiway system (FN-36). Most of the hangars in this group were constructed between 1980 and 1994. The exceptions are hangars FN-17, FN-23, FN-24, and FN-25 which were all added to the property after 1999, and hangar FN-9 which was replaced with a larger hangar between 1999 and 2003. Four of the hangars (FN-10, FN-11, FN-12, and FN-13) are situated in the center of the property, along the eastern edges of the apron. All the hangars in this group were built between 1999 and 2003.

An additional eight hangars (FN-27, FN-28, FN-29, FN-30, FN-31, FN-32, FN-33, and FN-34) are located northeast of Warbird Lane. These hangars were all added to the property after 1999. The remaining

three hangar buildings include FN-26, located northeast of the apron adjoining the Warbirds Café (FN-41), FN-2, located southwest of the office, and FN-41, located southeast of FN-26. Of these, FN-2 is the oldest, having been constructed between 1980 and 1994. FN-26 and FN-41 were constructed between 1999 and 2003. The largest of the hangers (FN-26) consists of a private hangar owned by Teton Aviation, which measures approximately 150 feet long by 100 feet wide. All of the hangars at the Driggs-Reed Memorial Airport are in good condition.

Runway System (FN-35)

The runway system at the Driggs-Reed Memorial Airport consists of a single asphalt runway (designated Runway 4-22) and an alternate grass landing area (AGLA). The runway is oriented northeast to southwest and measures 7,300 feet long by 100 feet wide. The structure has a pavement strength of 74,000 pounds dual-wheel gross weight loading.

The AGLA is located in the runway safety area, approximately 10 feet from the west edge light system and centered between the two taxiways. The landing area is 3,000 feet long by 100 feet wide and is marked at 200-foot intervals with molecular weight polyethylene cones, each of which measures 36 inches in diameter and 24 inches high.

Articles printed in the *Teton Valley News* and *Jackson Hole News* suggest that the runway system has undergone numerous modifications since its original construction in 1947. When initially built, the runway consisted of a 3,400-foot-long by 200-foot-wide grass landing strip. It remained a grass strip until 1975, at which point the structure was extended and narrowed, and the surface was paved according to Idaho Transportation Department (ITD) highway specifications (HDR Engineering, Inc. 2012).

The runway system is in good condition and is required by the FAA to be regularly maintained. While the asphalt runway is the first structure to be built at the site in 1947, it has been modernized by rehabilitation efforts occurring during the late twentieth and early twenty-first centuries. Modifications have included resurfacing, narrowing, and the addition of a new taxiway system (FN-36) that abuts its eastern end.

Taxiway System (FN-36)

FN-36 is the airport's current taxiway system, consisting of a full-length parallel taxiway (referred to as Taxiway A) and three connector taxiways (Taxiways C, D, and E). The taxiway system currently provides access to the runway system from the apron and tie-down area, while allowing aircrafts to move onto and off of the runway safely and efficiently.

Taxiway A parallels Runway 4-22 (FN-35) to the northwest and measures 7,500 feet long by 35 feet wide and has 10-foot-wide gravel shoulders. There are run-up areas at each end of the taxiway that connect to both ends of the runway. All four of the taxiways were reconstructed in 2009 to accommodate the C-II design gradient standards.

In addition to the taxiways, there are four taxilanes (Taxilanes H, F, G, and J) that support and provide hangar access. All of the taxilanes connect to Taxiway A for access to the runway. The oldest of the two taxilanes are Taxilanes H and J, which start at the southern end of the facility and serve the oldest hangars. The remaining two taxilanes, as well as an existing taxilane without a letter designation, services on-airport hangars and the adjacent Driggs Fly-In Parkway and Teton West subdivisions.

According to article in the *Teton Valley News* the taxiway system at the Driggs-Reed Memorial Airport was initially constructed in 1991. A Master Plan produced for the Driggs-Reed Memorial Airport by HDR

Engineering, Inc. in 2012 indicates that the taxiway system was re-constructed in 2009 to conform to C-II design gradient standards.

SRE Building (FN-37)

FN-37 consists of an approximately 80 feet long by 40 feet wide prefabricated steel building, located in the southwest corner of the airport property. The building sits on a concrete foundation and has a low-pitched front gable roof. The east (main) façade of the building is accessed via three evenly spaced garage bays. Each bay is enclosed with a metal garage door, which features a series of 12 small, rectangular fixed pane windows. There is no other fenestration on the building. This building serves as a storage facility for the airport's snow removal and airport maintenance equipment. It was added to the airport property between 2003 and 2004. It has not undergone any obvious exterior modifications and is in good condition.

Storage Shed (FN-38)

The storage shed (FN-38) is located approximately 30 feet west of the SRE building (FN-37). The building is approximately 20 feet long by 12 feet wide and is constructed of prefabricated steel with a front gable roof. The west (main) façade of the building abuts a metal security fence which obscures the façade from view. There is no other fenestration present on the north, south, or east façades of the building. FN-38 has been present at this location since at least 2009 and is in good condition.

Driggs Industrial Park (FN-39)

The Driggs Industrial Park (FN-39) is in the southwest corner of the airport property, east of State Highway 33 and serves as an incubator for local businesses. The industrial park consists of a 50,000 ft^2 one-story masonry building constructed in a T-shaped plan, with a poured concrete foundation and a metal cross-gabled roof. Precast concrete panels are used for the building's exterior walls. The main (north) façade consists of a front gabled projection with two entrances. The west (right) entrance consists of a single wood frame panel door flanked by a pair of two-lite sidelights, while the east (left) entrance consists of a metal frame door with one two-lite sidelight. Both doors have a central glass panel. Two rectangular vents are located beneath the gable peak on the north façade, and another is located beneath these and to the east (left). The north façade of the ell consists of three vertical rectangular metal frame fixed-pane windows and a recessed entrance. The metal roof extends over the ell, creating a porch on the north façade. A series of five round metal poles embedded in a stone wall support the porch roof on the north façade.

The west façade of the building includes two more entrances consisting of single leaf metal doors sheltered beneath gabled metal roof porches supported by wood side walls with openings at the top of each wall. A series of four vertical rectangular fixed pane windows are located between the two entrances on the west façade. Additionally, a garage bay is located adjacent to the northernmost entrance. The east (rear) façade of the building is comprised of an offset garage bay and one single offset entrance which is enclosed with a single leaf metal door. Two vertical rectangular fixed-pane windows are located on the southern portion of the façade, and two are located on the northern portion. Three square vents are located beneath the gable peak on the east façade. The south façade of FN-39 consists of two entrances and a vertical rectangular fixed-pane window facing south on the main block; a single entrance and rectangular roof vent face south on the south arm of the "T"; and three identical fixed-pane windows face west on the south arm of the "T." Like the north façade, the

metal roof extends over the south façade to create a sheltered porch supported by metal posts embedded in a stone wall. A garage with south-facing gable is attached at the south end of the south arm of the "T." The east façade of this portion is recessed slightly with an overhanging eave supported by metal posts. A garage opening faces east on this portion, and a rectangular vent faces south underneath the gable.

The Driggs Industrial Park (FN-39) was initially constructed in 1991, and underwent improvements that included landscaping, bringing the building up to fire code, and paving the parking lot in 1995 (*Teton Valley News* 1995c). Additionally, an approximately 40-foot-long by 15-foot-wide addition was constructed on the south façade between 2006 and 2009. The building is currently in use and in good condition.

Bicycle Shed (FN-40)

The bicycle shed (FN-40) consists of a small, prefabricated metal shed which stores bicycles provided by the Idaho Aviation Association. The building has a metal front gable roof and is accessed by a single door on the south (main) façade. The building is situated on two horizontal wood skids and does not have a permanent foundation. There is no other fenestration present on the building. This building was added to the Driggs-Reed Memorial Airport sometime after 2017.

Warbirds Café and Museum (FN-41)

The Warbirds Café and Museum (FN-41) consists of a two-story prefabricated metal building measuring approximately 165 feet long by 100 feet wide, oriented northwest-southeast. The building has an asymmetrical front gable metal roof. The northwest half of the building is used as the Teton Aviation Airplane Museum, while the Warbirds Café occupies the southeast half of the building. The portion of the building that contains Warbirds Café has been clad in stucco with a decorative stone veneer applied beneath the windows on all façades, while the museum portion consists of standing seam metal with a decorative stone veneer along the bottom of the façade. The primary access for the Warbirds Café is located on the northeast (main) façade of the building. The entrance consists of a pair of glass doors which are located on a gable front entry vestibule, projecting approximately 10 feet from the northeastern corner of the façade. Four two-lite horizontal sliding windows are located to the right (northwest) of the entry vestibule on the first floor of the building. Four additional two-lite horizontal sliding windows are located on the second story of the northeast façade, with two located on the restaurant portion, and two symmetrically placed on the museum portion. The northeast façade of the museum portion consists of two single leaf metal doors and a single garage bay. Additionally, a shed roofed equipment enclosure is located southeast of the garage bay on the northeast façade.

An outdoor dining area for the Warbirds Café is located on the southeast side of the building. The east façade has four banks of fixed pane metal frame windows which look out onto the runway. Two single glass doors are also present on the east façade to provide access to the outdoor dining area. The southwest façade of FN-41 has one primary entrance which provides access to the Warbirds Café. The entrance is located in a gable front entry vestibule located in the center of the restaurant's southwest façade. The entrance is flanked on the first floor by three two-lite horizontal sliding windows to the southeast and two two-lite sliding windows to the northwest of the entrance. Two additional two-lite horizontal sliding windows are located on the second floor of the southwest façade. The museum portion of the building is accessed on the southwest façade by a large bi-fold door. The northwest

façade of the building has no fenestration. FN-41 was constructed between 2000 and 2001 and is in good condition.

NRHP Eligibility Evaluation

Driggs-Reed Memorial Airport Historic District Recommendation

The Driggs-Reed Memorial Airport property was evaluated for eligibility for listing in the NRHP per the request of Jviation, Inc. The airport contains 41 resources constructed at various times between 1947 and 2017, all of which are associated with the property's current use as a City-owned and operated airfield. As the airport is a geographically-definable area possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development, North Wind evaulated the Driggs-Reed Memorial Airport as a historic district.

The Driggs-Reed Memorial Airport was developed in 1947 as a single grass strip runway, surrounded by agricultural fields. As late as 1962, the airport was still only lightly used, unlighted, and lacked a full-time staff. It underwent only minor modifications until the mid-1970s when the runway was finally paved, and the first airplane hangar was constructed. In the early 1990s, the Driggs-Reed Memorial Airport received the first of a series of large grants to improve its overall infrastructure. Since that time, the Driggs-Reed Memorial Airport has experienced significant modifications including the addition of approximately 40 airplane hangars, construction of a full-length taxiway, and excavation, leveling and widening of the existing runway.

Based upon the results of the architectural survey, North Wind recommends that the Driggs-Reed Memorial Airport has historical significance under Criterion A, under the contexts of Mid-20th Century aviation history and the development of the recreation and tourism industries in the Teton Valley. However, as the airport has undergone extensive modern alterations and additions, it is no longer able to convey its historical significance under these themes. While the airport is associated with local aviator Fred Reed, the property has experienced significant modifications since Reed's tenure as manager and is no longer representative of his contributions to aviation in the Teton Valley; thus it is not considered eligible under Criterion B. The extensive modern alterations that have occurred at the property have compromised its original design and construction, and it is therefore not considered to be the best representative example of a Mid-20th Century rural airport. For this reason, North Wind recommends that the Driggs-Reed Memorial Airport is also not eligible for NRHP listing under Criterion C. Lastly, the buildings and structures present at the Driggs-Reed Memorial Airport are surface manifestations, and no additional features or artifacts were observed within the vicinity. Therefore, the property is recommended not eligible for inclusion in the NRHP under Criterion D.

Additionally, 40 of the 41 resources currently comprising the district were constructed outside the period of significance (1947–1965) and are therefore considered to be non-contributing. As the eligibility guidelines for historic districts require at least 51 percent of the total resources to be contributors, the district does not retain sufficient integrity to be eligible for listing in the NRHP (National Park Service 1997). Therefore, the Driggs-Reed Memorial Airport is recommended not eligible for NRHP listing.

Driggs-Reed Memorial Airport Runway (FN-35) Individual Eligibility Recommendation

As the runway (FN-35) is the only historic age resource at the Driggs-Reed Memorial Airport, North Wind evaluated it individually as a historic structure to assess whether it had standalone significance and integrity which would make it individually eligible for NRHP listing. The NRHP distinguishes structures from

buildings as functional constructions typically made for purposes other than providing human shelter. In order for the runway to be considered individually eligible for listing in the NRHP, it would have to meet at least one of the NRHP criteria for eligibility and retain most of its integrity. For the reasons described below, North Wind recommends that the Driggs-Reed Memorial Airport runway is not individually eligible for listing in the NRHP.

The Driggs-Reed Memorial Airport runway is not recommended eligible under Criterion A as it no longer retains integrity sufficient to convey its historic use as a graded runway serving a rural community. The runway was also not found to be associated with a person or persons significant in local, regional, or national history; therefore, the airport is not recommended eligible under Criterion B. The runway is also not recommended eligible under Criterion C as it no longer retains integrity of design, setting, materials, workmanship, feeling, and association due to the multiple renovations of the runway itself, the commercial and residential encroachment of the City of Driggs, and the substantial growth and development of the airport. The runway cannot be considered the best and most representative example of a rural, graded runway constructed in the 1940s. And finally, the information potential of the runway has been exhausted by multiple renovations, some requiring excavations, and it is therefore not recommended eligible for listing under Criterion D.

Due to multiple alterations, including lengthening in 1965; paving in 1975; introduction of lighting in 1976; lengthening the runway and adding a full-length taxiway parallel to the runway in 1991; and a complete renovation in 2009 which included excavation and leveling, and widening; the runway no longer retains integrity of design, setting, materials, workmanship, feeling, and association. Below is a discussion of each aspect of integrity as it relates to the Driggs-Reed Memorial Airport runway.

Location: the place where the historic property was constructed or the place where the historic event occurred. The Driggs-Reed Memorial Airport runway has not been moved from its original location, and therefore retains integrity of location.

Design: the combination of elements that create the form, plan, space, structure, and style of a property. The Driggs-Reed Memorial Airport runway no longer retains its original configuration as a narrow, graded runway typical for rural airports during the 1940s due to multiple alterations. As a result, the runway no longer retains its integrity of design.

Setting: the physical environment of a historic property. The Driggs-Reed Memorial Airport runway no longer retains the basic physical conditions under which it was constructed as a rural, graded runway surrounded completely by agricultural open space due to residential and commercial encroachment from the surrounding urban area, and from the growth in capacity and services as evidenced by modern-age buildings and structures located on the airport property. Therefore, the runway no longer retains integrity of setting.

Materials: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The Driggs-Reed Memorial Airport runway no longer retains its integrity of materials due to multiple modifications, including a complete renovation as recent as 2009.

Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. The Driggs-Reed Memorial Airport runway no longer retains its integrity of workmanship due to multiple modifications, including a complete renovation as recent as 2009.

Feeling: a property's expression of the aesthetic or historic sense of a particular period of time. Integrity of feeling is further defined as the physical features that, when taken together, are able to convey the property's historic character and function. These features include the elements that make up the setting, and association of the property. The Driggs-Reed Memorial Airport runway is no longer able to convey its historic character as a rural, graded runway surrounded exclusively by agricultural open space.

Association: the direct link between an important historic event or person and a historic property. The Driggs-Reed Memorial Airport runway no longer retains its integrity of association as a small, graded runway constructed in the 1940s to serve a rural community. Additionally, due to extensive modifications, the runway no longer demonstrates a clear association with former manager Fred Reed.

Management Recommendations

North Wind's CRI and architectural survey indicates that the Driggs-Reed Memorial Airport is not eligible for listing in the NRHP. Although North Wind recommends that the Driggs-Reed Memorial Airport has historical significance under Criterion A, under the contexts of Mid-20th Century aviation history and the development of the recreation and tourism industries in the Teton Valley, the airport has undergone extensive modern alterations and additions, and it is no longer able to convey its historical significance under these themes. Additionally, 40 of the 41 buildings and structures that currently comprise the Driggs-Reed Memorial Airport are of modern construction and are therefore not considered to be contributing properties of the District. As the eligibility guidelines for historic districts require at least 51 percent of the total resources to be contributors, the district does not retain sufficient integrity to be eligible for listing in the NRHP (National Park Service 1997). Additionally, the historic-age runway (FN-35) has undergone numerous alterations, including lengthening and paving, which have compromised its integrity of design, setting, materials, workmanship, feeling, and association. Therefore, the runway (FN-35) is also not recommended individually eligible for NRHP listing.

An additional historic property identified within the northern study area is the previously recorded, NRHP eligible Grand Teton Canal (IHSI no. 10TN67). North Wind recommends that the segments of the Grand Teton Canal within the study area retain sufficient historic integrity to contribute to the eligibility of the larger canal system.

Aerial photographs indicate that the northern study area has been used continuously for agricultural production since the 1940s. Because of this, as well as previous ground disturbance within the study area, the probability of intact archaeological sites is extremely low.

Determination of Effects

Grand Teton Canal (IHSI no. 10TN67)

As the segment of the Grand Teton Canal (IHSI no. 10TN67) and associated lateral system in the northern study area is within the location of the proposed runway extension, North Wind recommends that the proposed project actions will have an adverse effect on the historic integrity of the Grand Teton Canal (IHSI No. 10TN67). The Grand Teton Canal has been recommended eligible for listing in the

NRHP under Criterion A for its association with the agricultural development of the Teton Valley. The canal's integrity of setting has already been compromised with the encroachment of residential development; however, the proposed runway extension would further damage the canal's integrity of feeling, workmanship, materials, association, and design. This resource should be avoided by future project activities. If the resource cannot be avoided, it should be subject to intensive-level historic documentation consisting of additional archival research and detailed field recordation to resolve adverse effects on the property.

Driggs-Reed Memorial Airport (NRD-1) and Runway (FN-35)

As the Driggs-Reed Memorial Airport (NRD-1) and the historic-age runway (FN-35) have both been recommended not eligible for NRHP listing, the proposed project will have no adverse effect on either of these resources.

Avoidance, Minimization, or Mitigation Options

There are no avoidance alternatives proposed for this project by the FAA. If additional cultural resources are encountered during construction, ground disturbing activities will cease until the FAA and appropriate cultural resources staff are consulted.

Conclusions

At the request of Jviation Inc., North Wind conducted a CRI and architectural survey of the Driggs-Reed Memorial Airport (formerly known as the Teton Peaks-Driggs Airport) property located in the City of Driggs, Teton County, Idaho.

A CRI of 90 acres within the Driggs-Reed Memorial Airport was previously completed by North Wind in 2014 (Schlegel and Shelton 2014); however, an architectural survey of the property was not completed at that time. Additionally, since that date, 240 acres of agricultural land located at the north end of the current runway system at the Driggs-Reed Memorial Airport has been proposed for acquisition. Upon acquisition of the land, the City of Driggs is planning to shift the existing Runway 4-22 runway system to the northeast, relocate the runway protection zone, and improve the runway approach and departure surfaces. Other proposed project activities include extending the runway pavement on the northeast end of Runway 22; extending the existing west parallel taxiway and new connecting taxiway at the relocated Runway 22; relocating the Runway 4 threshold; removal of existing pavement south of the relocated Runway 4 end; construction of paved blast pads off the ends of each runway; closure of Teton Park Road, extension of Sweetgrass Road, and the construction of a new connector road between Sagebrush and Sweetgrass roads; removal of the existing property fence and construction of new wildlife fencing along the new property line; relocation of associated NAVAIDS; and amending flight procedures to accommodate the shift in runway location. The goal for the project is to support a safe and viable airport now and into the future by correcting deficiencies to FAA guidelines and standards. The current CRI and architectural survey were completed as a supplement to the 2014 CRI as part of the land acquisition process for use by the FAA. Jviation is the engineering firm responsible for designing the improvements associated with the proposed project.

One previously recorded cultural resource was identified within the APE. Site 10TN67 (Grand Teton Canal) has been previously determined eligible for listing in the National Register of Historic Places (NRHP) under Criteria A. Within the project area, the Grand Teton Canal (10TN67) consists of one previously recorded segment measuring approximately 0.72 miles long, which runs east-west along the southern boundary of the project area, and three interconnected lateral irrigation ditches that transect the project area in various locations. The segments of the Grand Teton Canal (IHSI No. 10TN67) within the current project area retain their integrity of workmanship, materials, design, location, and association. The canal's integrity of setting has been compromised by the encroachment of residential development, which has replaced agricultural uses with residential subdivisions. However, as it retains six of the seven aspects of historic integrity, and continues to provide water for agricultural use, the segments of the canal within the APE are recommended to be contributing segments of the larger Grand Teton Canal System. The proposed runway extension would cross over portions of the Grand Teton Canal potentially damaging its integrity of feeling, workmanship, materials, association, and design. Therefore, North Wind recommends that the proposed project will have an adverse effect on the Grand Teton Canal (IHSI No. 10TN67).

Additionally, two newly recorded historic-age properties—the Driggs-Reed Memorial Airport and runway—are located within the APE. The Driggs-Reed Memorial Airport (NRD-1) and runway (FN-35) are not recommended eligible for NRHP listing under any criteria. Therefore, overall project actions will have No Adverse Effect on these properties.

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Photograph 1. View of proposed runway extension area, facing northwest (North Wind, August 2020).

Photograph 2. View of proposed runway extension area, facing south to Grand Teton Canal (10TN67) (North Wind, August 2020).

Photograph 3. View of proposed runway extension area, facing southeast (North Wind, August 2020).

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Photograph 42. View of taxiway (FN-36), facing southwest (North Wind, August 2020).

Photograph 43. View of SRE Building (FN-37), facing southwest (North Wind, August 2020).

Photograph 44. View of storage shed (FN-38), facing southwest (North Wind, August 2020).

Photograph 45. View of Driggs Industrial Park (FN-39), facing southeast (North Wind, August 2020).

Photograph 46. View of bicycle shed (FN-40), facing east (North Wind, August 2020).

Photograph 47. View Warbirds Café and Museum (FN-41), facing northeast (North Wind, August 2020).

ARCHAEOLOGICAL AND HISTORICAL SURVEY REPORT
ARCHAEOLOGICAL SURVEY OF IDAHO

A. KEY INFORMATION

1. **Project Name: Driggs-Reed Memorial Airport Expansion, 25 Parcels, City of Driggs, Idaho**
2. **Report Number:** AIP-3-16-0012-013
3. **Agency Name**: Federal Aviation Administration
4. **Report Author:** Trinity Schlegel and Jeff Shelton
5. **Date:** June 6, 2014
6. **County:** Teton
7. **Township, Range, Section:** T. 12 N., R. 18 E. Sections 23, 24, 26
8. **Acres Surveyed:** 90 acres (30 meter or less interval)

B. PROJECT DESCRIPTION

1. **Description of project and potential direct and indirect impacts to known or suspected historic properties:**

Jviation proposes to widen and lengthen the runway and construct new taxiway, parking and hangar space at Driggs-Reed Memorial Airport in accordance with Federal Aviation Administration (FAA) regulations. The FAA has mandated the Driggs Reed Memorial Airport move the centerline of the current runway 60 feet to the east and expanding the runway from its current width of 75 feet to 100 feet. In addition, the taxiway will be raised to the same elevation of the runway and repaved. New parking and hangar space will be built on areas adjacent to the runway and existing airport facilities. This action will upgrade the airport from B-II to C-II status. In order to precede with the expansion project the property surrounding the airport is being acquired.

2. **Description of Area of Potential Effects (APE) with reference to attached map:**

The Area of Potential Effect (APE) includes the area located on the northwest side of the airport runway. The area includes developed lots adjacent to the airport.

3. **Project acres:** 90 acres
4. **Owner(s) of land in project area:** Private, Driggs-Reed Airport

2014 Class III Cultural Resource Survey

C. STATEMENT OF OBJECTIVES FOR SURVEY

The objectives of the survey were to document prehistoric and historic cultural material through review of archival sources and intensive surface examination of the APE in accordance with 36 CFR 800.

D. LOCATION AND GENERAL ENVIRONMENTAL SETTING

1. USGS topographic map(s): Driggs and Clawson, Idaho, USGS 7.5 minute series

2. Setting:

The project area is located just north of Driggs, Idaho and adjacent to, the northwest of the existing runway and east of the airport facilities at the Driggs-Reed Memorial Airport.

The APE is located in the Middle Rocky Mountain Province (Fenneman 1931:168-169) in the Teton Basin. The Teton Basin is situated within the Wyoming Overthrust Belt System located in eastern Idaho and western Wyoming between the Teton Mountain Range to the east and the Big Hole Mountain Range to the west. The basin is level, with the surrounding mountainous landscape brought about by historic uplifts, faults, fault blocks, alluvial deposits and stream cutting action that has created steep narrow canyons. The project area is at an elevation of 6,200 feet. The project area is situated in the southeast portion of the Teton Basin on flat terrain.

The Tetons are a basement rock hoisted along a fault that defines the eastern edge of the range (Alt and Hyndman 1989:308). The Tetons consists of a core of igneous and metamorphic Precambrian rocks overlain in most of the range by westward dipping sedimentary Paleozoic rocks. About 10 million years ago, stresses of the Earth's crust caused movement along the Teton fault. The Teton Fault lies on the 40-mile long eastern front of the Teton Range. The rock rises dramatically 7,000 feet from the valley floor, with the Grand Teton the highest peak soaring above all at 13,770 feet. The western part of the fault has pushed upwards to form the Teton Range creating the youngest range of the Rocky Mountains. Simultaneously the east side of the fault drops downward to form the valley of Jackson Hole. It is this dynamic of the west side of the fault rising while the east side falls that creates the outstanding rock monoliths that are the Grand Tetons (Greater Yellowstone Resource Guide 2010).

The climate in the project area is montane in the broader continental climate type with cooler temperatures and higher precipitation than in lower elevation areas of the region. Summers are short and winters long and cold. Average total precipitation is 15.60 inches per year. The month with the highest precipitation is May with 1.85 inches, with June a close second at 1.84 inches. Average annual total snowfall for Driggs is 63.30 inches. The average minimum temperature in January is 6.5° F, with an average maximum

temperature of 29.7° F. The average maximum temperature occurs in July at 81.1° F, with an average minimum temperature of 46.2° F (Western Regional Climate Center 2014).

Soils in the project area are mostly Alpine-Driggs complex soils, which are well drained gravelly loams formed from alluvium in 0 to 2 percent slopes, and Alpine-St. Anthony complex soils, which are much the same (Web Soil Survey 2014).

The undeveloped areas within the Driggs-Reed Memorial Airport are dominated by perennial and annual grasses (i.e., sheep fescue and crested wheat) – which were planted throughout the airport following past construction activities – and annual weedy species such as tumble mustard, kochia, and yellow sweet clover. The project area contains little to no shrubs.

E. PRE-FIELD RESEARCH

1. Sources of information checked:

- ☒ Overviews
- ☒ National Register
- ☒ Archaeological site records/map
- ☐ Architectural site records/maps
- ☒ Survey records
- ☐ Ethnographic studies
- ☒ Historical records/maps: GLO survey plat
- ☐ Individuals/Groups with special knowledge (list)
- ☐ Other (list)

2. Summary of previous studies in the general area:

A file search was conducted by the Idaho State Historic Preservation Office (SHPO), Record Search #14189, which included a search of archaeological records, site records and survey records. Twenty-one previously conducted cultural resource inventories were found to have been conducted within a mile of the project area. Table 1 lists the previous studies.

Table 1. Previous studies conducted within one mile of the project.

SHPO Report No.	Report Title	Author	Date	Acres
1989/1995	Annual Report of Archaeological Investigations, 1984. Idaho Transportation Dept. Boise, Idaho, December 1984.	Gaston, J.	1984	0
1989/2149	PSR, Nickerson Bridge In-51. Idaho Transportation Dept.	Gaston, J.	1988	1
1994/540	Driggs Water & Wastewater System Improvement. Targhee National Forest.	Willingham, C.	1994	7
1994/916	Driggs Downtown Revitalization. University of Idaho.	Sammons, D.	1994	0
1996/124	Driggs to Victor Bike Path. Idaho Transportation Dept.	Petersen, N.	1995	18

SHPO Report No.	Report Title	Author	Date	Acres
1995/1010	Lowell Curtis Irrigation Pipeline and Canal. Frank Fink, SCS Boise.	Willingham, C.	1995	1
1998/780	Class III Cultural Resource Inventory of Victor to Driggs Sewer Transmission Line in Teton County, Idaho. Victor, Idaho.	Crockett, S.	1998	175
1999/103	Idaho Forest Highway 76 and Wyoming Forest Highway 76, Grand Targhee Road. Targhee N.F.	Berryman, J.	1998	100
2000/913	Class III Cultural Resource Inventory of Lot 3 Block II Valley Centre Housing Development in Driggs, Teton County, Idaho. Report prepared for Idaho Housing and Finance Association, Boise, ID.	Crockett, S.	2000	5
2001/549	SH-31, Pine Creek Summit to SH 33: DHB Aggregate Source. Idaho Transportation Department.	Crockett, S.	2001	15
2001/863	Lots 4 & 5, Block II, Valley Centre Subdivision. Report prepared for Idaho Housing and Finance Association, Boise, ID.	Crockett, S.	2001	8
2002/484	City of Driggs Spring Redevelopment and Waterline, Teton County, ID. Report prepared for City of Driggs, Idaho.	Crockett, S.	2002	84
2008/237	Highway 33, M.P. to Wyoming State Line. Frontier	Gray, D.	2002	960
2009/317	Paul Gilroy Teton Creek Restoration. Stephanie Crockett, Victor, ID.	Crockett, S.	2009	5
2009/538	Friends of the Teton River (FTR) Teton Creek Restoration. S. Crockett, Victor, ID.	Crockett, S.	2009	40
2007/539	Targhee Tap Access Road Construction, Near Driggs	Brannan, N. and S. C. Schmidt	2007	3
2010/281	Driggs Bike Path. ITD.	Everhart, D.	2010	5
2011/307	Walter Ready Mix Gravel Pit, Crockett, Victor, Idaho.	Crockett, S.	2010	40
2011/314	Teton Scenic Byway Visitors Center, ITD, Boise, Idaho. ITD.	Munch, M.	2010	1
2014/53	BPA Targhee Substation Land Planning near City of Driggs in Teton County (KEC-4) A Cultural Resource Survey for the Targhee Substation Expansion Driggs, Idaho	Perkins, K.	2013	6
2014/134	Another Roll of the Dice: The Creekside Meadows Aboriginal Burial (10-TE-90) in Teton Valley, Eastern Idaho. Journal of Northwest Anthropology, Memoir 7: 137-166	Reid, K. C., S. J. Miller, and L. K. Schiess	2012	0

3. Description and evaluation of projects in E.2 with regard to survey design, methods, personnel, and results:

With the exception of the 1989 Gaston report, the above surveys were conducted with standard archaeological practices. Gaston (1989) is a compilation of Idaho Transportation Department projects done for an entire year.

F. EXPECTED HISTORIC AND PREHISTORIC LAND USE AND SITE SENSITIVITY

1. Are cultural properties known in this area? [ ] No [X] Yes

Two archaeological sites, 62 historical sites and three linear sites are previously recorded within a mile of the project according to SHPO records and are summarized in Table 2.

Table 2. Previously recorded sites within a mile of the project area.

Site No.	Type of Property	Artifacts/Features	NRHP Eligibility
10TN37	Buildings	Driggs Warehouse; house and warehouse compound; fame house, cinderblock warehouse, 3 storage buildings, hay shed, barn	Ineligible
10TN48/ 81-17906	Railroad	Teton Valley Branch – UPRR railroad	Eligible
10TN66	Domestic Water	Driggs Idaho Water Pipeline	Ineligible
10TN67	Canal	Grand Teton Canal	Undetermined
10TN89	Prehistoric Isolate	Corner-notched point	Ineligible
81-171	Building	Mike's Diner	Eligible
81-173	Building	Drugstore / Wells Fargo	Ineligible
81-174	Building	Teton County Courthouse	Eligible
81-8682	Building	Log Lean-to	Undetermined
81-17889	Building	U.S.F.S. Administrative Site	Ineligible
81-17889A	Building	U.S.F.S. Bunk House	Ineligible
81-17890	Building	Driggs Armory	Ineligible
81-17926	Building	Nicholson Cottage	Ineligible
81-17927	Building	Burnside Cottage	Ineligible
81-17948	Building	Wilson House	Ineligible
81-17949	Building	Driggs Cabin	Ineligible
81-17950	Building	Bunk House Cafe and Motel	Eligible
81-17951	Building	Driggs Tire	Ineligible
81-17952	Building	Bauer Cottage	Eligible
81-17953	Building	Hoffmaster Cottage	Eligible
81-17954	Building	Huff Cottage	Ineligible
81-17955	Building	Pinvelas Cottage	Ineligible
81-17956	Building	MiSo Hungry Cafe,	Ineligible
81-17957	Building	Cooke Commercial Building	Ineligible
81-17958	Building	Anchor Mortgage	Ineligible
81-17959	Building	Block Building	Ineligible
81-17960	Building	Farm Bureau Building	Ineligible
81-17961	Building	Davis Cottage	Ineligible
81-17962	Building	Neild House	Ineligible

Site No.	Type of Property	Artifacts/Features	NRHP Eligibility
81-17963	Building	Jorgensen House	Ineligible
81-17964	Building	Hillman House	Ineligible
81-17965	Building	City Hall	Eligible
81-17966	Building	Fremont Building	Ineligible
81-17967	Building	Teton Valley Enterprises	Ineligible
81-17968	Building	Main Street Grill	Eligible
81-17969	Building	Mountaineering Outfitters	Eligible
81-17970	Building	Papa G's Pizza	Ineligible
81-17971	Building	Nield Cottage	Ineligible
81-17972	Building	Kirkham Auto Parts	Eligible
81-17973	Building	Driggs Garage	Eligible
81-17974	Building	Continental Real Estate	Eligible
81-17975	Building	N. Main house - 150	Ineligible
81-17976	Building	Basin Auto	Ineligible
81-17977	Building	Town & Country	Ineligible
81-17978	Building	Paris House	Eligible
81-17979	Building	Turner Bungalow	Ineligible
81-17980	Building	Butler House	Eligible
81-17982	Building	Harrop Cabin	Eligible
81-17983	Building	Seymour House	Eligible
81-172	Building	Price Mercantile General Store	Undetermined
81-2017	Building	Driggs Railroad Depot	Undetermined
81-8703	Building	Log Outbuilding	Undetermined
81-8704	Building	Log Structure	Undetermined
81-8705	Building	Log Outbuilding	Undetermined
81-8706	Building	Welfare Farm Log Barn #2	Undetermined
81-8707	Building	Welfare Farm Log Barn #1	Undetermined
81-17876	Building	Scott Bone House	Undetermined
81-17877	Building	Ford Garage	Ineligible
81-172	----------	Tom Hill Property #2	Ineligible
81-17879	----------	Tom Hill Property #2	Ineligible
81-17881	Building	O'Rourke's Fine Foods Restaurant	Ineligible
81-17886	Building	Teton Valley Hospital	Ineligible

2. Are cultural properties expected? [ ] Yes [X] No (Why?)

The survey area consists of developed land and agricultural fields.

3. What cultural themes/contexts are expected within the survey area? Check at least one theme in first two columns and at least one time period in the third column.

Theme		Time Period
☒ Prehistoric Archaeology	☐ Military	☒ Prehistoric
☒ Agriculture	☐ Mining	☐ Historic Native American
☐ Architecture	☐ Native Americans	☐ Exploration: 1805-1860
☐ Civilian Conservation Corp	☐ Public Land Mngt./Conserv	☒ Settlement: 1855-1890
☐ Commerce	☐ Recreation/Tourism	☒ Phase I Statehood: 1890-1904
☐ Communication	☒ Settlement	☒ Phase II Statehood: 1904-1920
☐ Culture and Society	☐ Timber Industry	☒ Interwar: 1920-1940
☐ Ethnic Heritage	☒ Transportation	☒ Pre-Modern: 1940-1958
☒ Exploration/Fur Trapping	☐ Other (list)	☐ Modern: 1958-present
☐ Industry		

4. Brief description of where cultural properties associated with expected themes might be found with respect to landforms, water, vegetation, slope, fauna, and historical documentation:

Prehistoric sites are possible on the relatively flat areas. These sites will likely consist of lithic scatters and open camps and may occur in conjunction with culturally-sensitive plants such as wild onion other food resources.

The area has been farmed for about 100 years prior to the establishment of the airport. Historic Euro-American sites will likely consist of agricultural-related sites such as tin can scatters, roads, and possibly canals or ditches.

G. FIELD METHODS

1. Areas examined and type of coverage:

The entire APE was examined on foot in transects spaced 30 meters apart.

2. Description of ground surface conditions:

Ground visibility ranged from 50 to 70 percent depending on vegetation.

3. Areas not examined and reasons why: None

4. Names of personnel participating in the survey in the field: Trinity Schlegel, Jeff Shelton

5. Date of survey: May 13-14, 2014.

6. Problems encountered: None

H. RESULTS

1. **Listing of all cultural properties (including previously recorded) in the APE: [X] None**
2. **Summary of important characteristics of properties listed above:** N/A
3. **Recommendations for National Register eligibility of each cultural property:** N/A
4. **Recommendations for further investigations needed to evaluate cultural properties:**

   No recommendations.

5. **Cultural properties noted but not formally recorded: [X] None**

I. CONCLUSIONS AND RECOMMENDATIONS

1. **Brief summary of relevance of cultural properties to contexts listed under F, discussing potential contributions to these contexts:**

   No new properties were recorded during this inventory.

2. **Discussion of potential threats to the integrity of the cultural properties and recommendations for future investigations or protective actions:**

   Due to the fact that no previously recorded sites or no newly recorded sites are located within the APE there are no potential threats to the integrity of cultural properties.

3. **For 106-related surveys, discussion of relationship of each cultural property to direct and indirect project impacts. [X] No properties**

   There are no potential direct or indirect project impacts to cultural properties. All recorded cultural properties are located outside of the APE (Figure 2).

4. **For 106-related surveys affecting cultural properties, discussion of avoidance or mitigation options for each property:**

   No cultural properties will be affected by this project.

5. **For 106-related surveys, recommendations for additional information gathering or survey, avoidance measures, monitoring, mitigation, and future management: [X] None**

   Cultural resource clearance is recommended for the Driggs-Reed Memorial Airport Expansion, City of Driggs, Idaho project subject to the following stipulations:

   1) All disturbances will be restricted to within the inventoried areas.

   2) If evidence of prehistoric or historic sites is discovered during the ground-disturbing activities, all activities within a 100-feet (30-m) radius of the site will cease immediately, and the appropriate personnel within State Historical Preservation Office should be notified.

3) All construction and maintenance personnel will be instructed of the confidentiality of site location information and that the collection of cultural material is prohibited.

J. ATTACHMENTS

1. Appropriate forms attached for each site?	☐ **N/A**
2. Maps attached?	☒ **Yes (**Figures 1 and 2)
3. Other attachments?	☒ **Photos** (Figures 3-10)

K. REPOSITORY

Original survey records, field notes, and photographs are located at North Wind's Idaho Falls, Idaho office.

L. CERTIFICATION OF RESULTS

I certify that this investigation was conducted and documented according to Secretary of Interior's Standards and guidelines and that the report is complete and accurate to the best of my knowledge.

Trinity D. Schlegel — June 6, 2014

Signature of Reporter — Date

Trinity D. Schlegel — June 6, 2014

Signature of Principal Investigator — Date

References:

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1931 *Physiography of North America*. MacGraw Hill Book Company, New York.

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2010 The Grand Tetons, Geology. Electronic document, accessed April 23, 2014. http://www.free-press.biz/Grand-Tetons.html.

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Western Regional Climate Center
2014 DRIGGS, IDAHO (102676), Period of Record Monthly Climate Summary, Period of Record: 1/3/1930 to 12/31/2005. Electronic Document, Accessed April 25, 2014. http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?iddrig.

U. S. General Land Office
1911 Original Survey Plat T. 12 N., R. 18 E. BLM GLO Records http://www.glorecords.blm.gov.

Figure 1. Map showing the general location of the project in Teton County, Idaho.

Figure 2. Project area, Driggs-Reed Airport. Taken from Google 2014.

Figure 3. IMG_DSC03224. View northeast of project area, Driggs-Reed Memorial Airport.

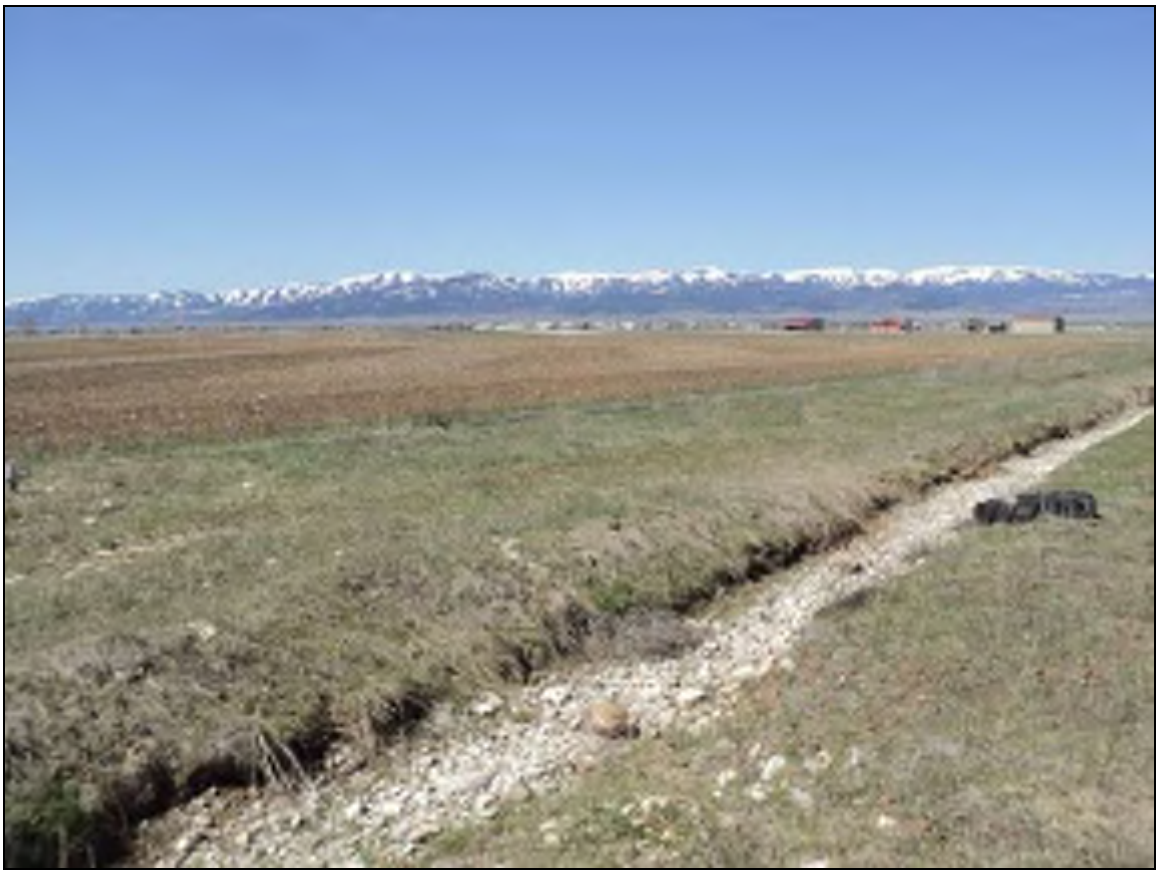

Figure 4. IMG_DSC03225. View southwest of project area, Driggs-Reed Memorial Airport.

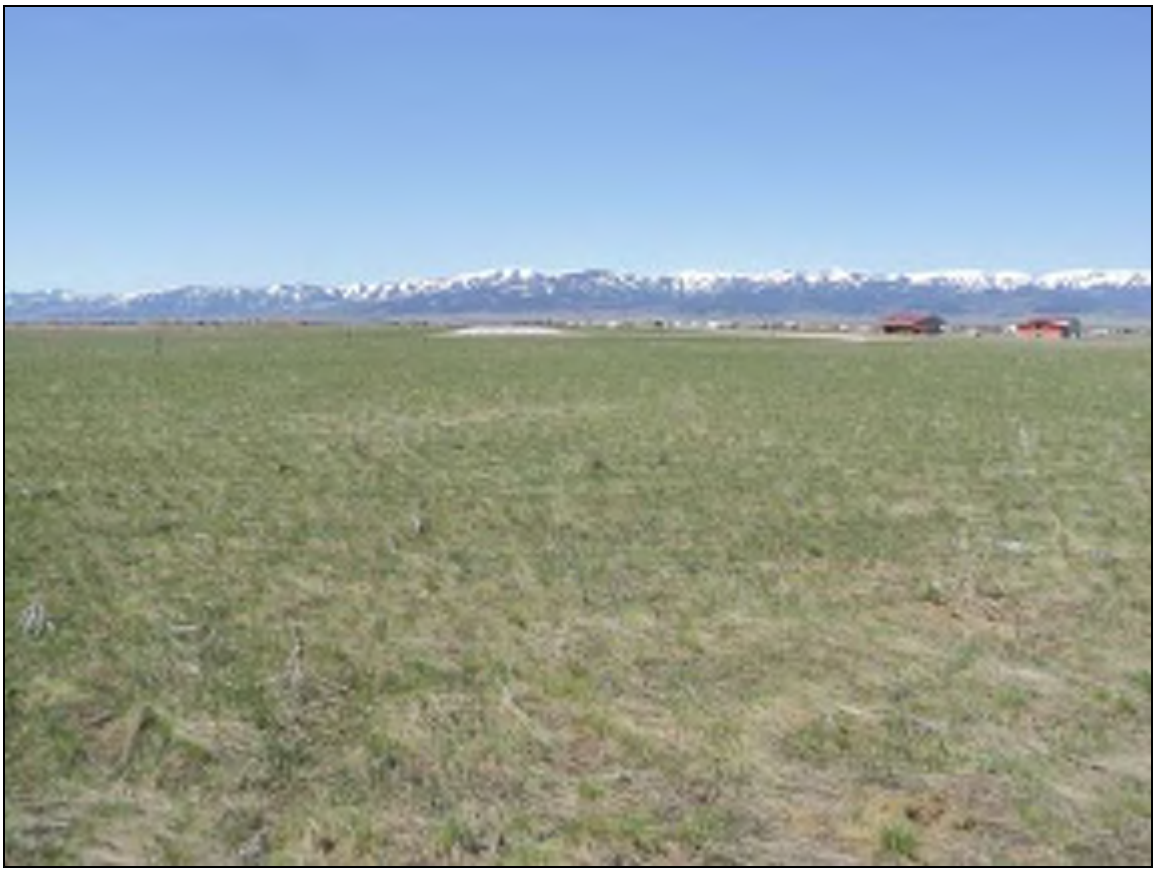

Figure 5. IMG_DSC03226. View southwest of project area, runway in background, Driggs-Reed Memorial Airport.

Figure 6. IMG_DSC03235. View west of project area, Driggs-Reed Memorial Airport.

Figure 7. IMG_DSC03241. View east of project area, Driggs-Reed Memorial Airport.

Figure 8. IMG_DSC03242. View east of project area, Driggs-Reed Memorial Airport.

Figure 9. IMG_DSC03248. View northeast of project area, Driggs-Reed Memorial Airport.

Figure 10. IMG_DSC03249. View northeast of project area, Driggs-Reed Memorial Airport.

US Department of Transportation

Federal Aviation Administration

DOT Section 4(f) Evaluation for the

Driggs-Reed Memorial Airport

Driggs, Idaho

June 2021

This Department of Transportation Section 4(f) Evaluation (also referred to as a Section 303 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; and Section 106 of the National Historic Preservation Act of 1966.

For further information, please contact:

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Driggs-Reed Memorial Airport DOT Section 4(f) Evaluation

TABLE OF CONTENTS

LIST OF ATTACHMENTS

1. INTRODUCTION

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

DOT Section 4(f):

> Prohibits the use of land of significance in publicly owned public parks, recreation areas, wildlife and waterfowl refuges, and land of a historic site for transportation projects unless the Administration determines that there is no feasible and prudent avoidance alternatives and that all possible planning to minimize harm has occurred.

The Federal Aviation Administration (FAA) is considering actions (known as Proposed Action) requested by the city of Driggs, Idaho (Airport Sponsor) to correct deficiencies in the Runway 4 Runway Protection Zone (RPZ) and Runway Object Free Area (ROFA) according to FAA design standards, at the Driggs-Reed Memorial Airport (Airport) in order to support a safe and viable Airport now and into the future. The Proposed Action involves shifting Runway 4/22 to the northeast by 1,945 feet along with associated projects as described in **Section 3.2**.

Implementation of the Proposed Action will require placing the Grand Teton Canal (10TN67) and associated ditches into culverts in numerous locations in order to facilitate the shifting of Runway 4/22 and reconfiguring of roads. The Grand Teton Canal is eligible for listing on the National Register of Historic Places (NRHP).

This DOT Section 4(f) Evaluation (Evaluation) was prepared as an appendix (**Appendix C)** to the Environmental Assessment (EA). This Evaluation consists of the following sections:

1. Introduction – Provides the regulatory context for the Evaluation; provides a brief description of the Airport; and describes the Purpose and Need for the Proposed Action;
2. Identification of DOT Section 4(f) Resources – Examines the lands in the airport vicinity relative to DOT Section 4(f) and identifies those resources that the FAA determined to be potentially subject to DOT Section 4(f);
3. Alternative Analysis – Identifies possible alternatives to avoid or minimize impacts to DOT Section 4(f) resources.
4. Coordination – Summarizes the efforts made to coordinate with agencies and parties owning DOT Section 4(f) lands on the potential effects of the proposed projects.
5. Finding – Provides the FAA DOT Section 4(f) Finding.

1.1 DOT Section 4(F) Feasible and Prudent Requirements

Programs or projects requiring the use of DOT Section 4(f) lands will not be approved by the FAA unless there is no prudent and feasible alternative to the use of such land, and such programs and projects include all possible planning to minimize harm resulting from the use. The term "feasible"[1] refers to sound engineering principals, while the term "prudent"[1] 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.

[1] FAA Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions. Page 10- 10

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 Airport Description and Surrounding Land Uses

The Driggs-Reed Memorial Airport (Airport) is a general aviation airport located in eastern Idaho near the Wyoming state line at 6,200 feet mean sea level. It lies within the Teton Valley between the Big Hole Mountains to the west and the Teton Range to the east. Access to the Airport is via Idaho State Highway 33, which runs north/south through the city of Driggs (**Figure 1-1**). The city of Driggs is approximately one mile south of the Airport.

Figure 1-1: Location Map

Source: Jviation

Two national parks and two popular ski areas are located near Driggs: Grand Teton National Park is approximately 40 miles east, while Yellowstone National Park is 115 miles northeast. Nearby skiing includes Grand Targhee Ski Resort, 12 miles northeast; and Jackson Hole Ski Area, approximately 34 miles southeast.

The Airport is home to a diverse aircraft fleet mix including single- and multi- engines, corporate jets, helicopters, gliders, and warbirds. Aircraft operators use the Airport for business, recreational, training, medical, and military activity, to name a few. Given its proximity to prime recreational opportunities, the Airport provides easy access for tourists. With several off-airport aviation subdivisions around the Airport, pilots can enjoy hangar ownership and adjacent living quarters with an approved through-the-fence agreement to access the airfield and aviation services.

Runway 4/22 at the Airport is 7,300 feet long and 100 feet wide with a full parallel taxiway, connecting taxiways, apron, airfield lighting, and visual and electronic navigational aids (NAVAIDs). The Airport also has an alternate grass runway located between Runway 4/22 and parallel Taxiway A, within taxiway connectors D and E. The grass runway is 3,050 feet long and 100 feet wide. **Figure 1-2** depicts an overview of the Airport's airside facilities.

Figure 1-2: Airside Facilities

Source: Jviation

The majority of airport services are provided by the Fixed Base Operator (FBO), Teton Aviation, including pilot instruction, major airframe and powerplant services, hangar space, tiedowns, oxygen service, deicing (Type 1), Jet-A and 100 LL fuel, scenic flights, an on-site restaurant, pilot lounge, courtesy transportation, and rental cars. Air Idaho Rescue also operates at the Airport and provides emergency response services to the region.

On-airport landside facilities include the main FBO facility that serves as a terminal building for Airport users, nearly 40 hangars ranging from 2,000 to 16,500 square feet, auto parking, and vehicle access. **Figure 1-3** presents an aerial view of the Airport's landside facilities.

Figure 1-3: Landside Facilities

Source: Jviation

The Airport also allows through-the-fence (TTF) operations from four different hangar lot developments located adjacent to the Airport on both sides of the runway. These development areas provide additional hangar space, help protect the Airport from undesirable development adjacent to the Airport, and help preserve the areas for aeronautical or other commercial uses. The four-platted TTF development subdivisions include Driggs Fly- In Parkway, Teton Aviation, Mustang Ranch, and Sweetwater Park. **Figure 1-4** details the TTF subdivision locations.

Figure 1-4: TTF Subdivision Locations

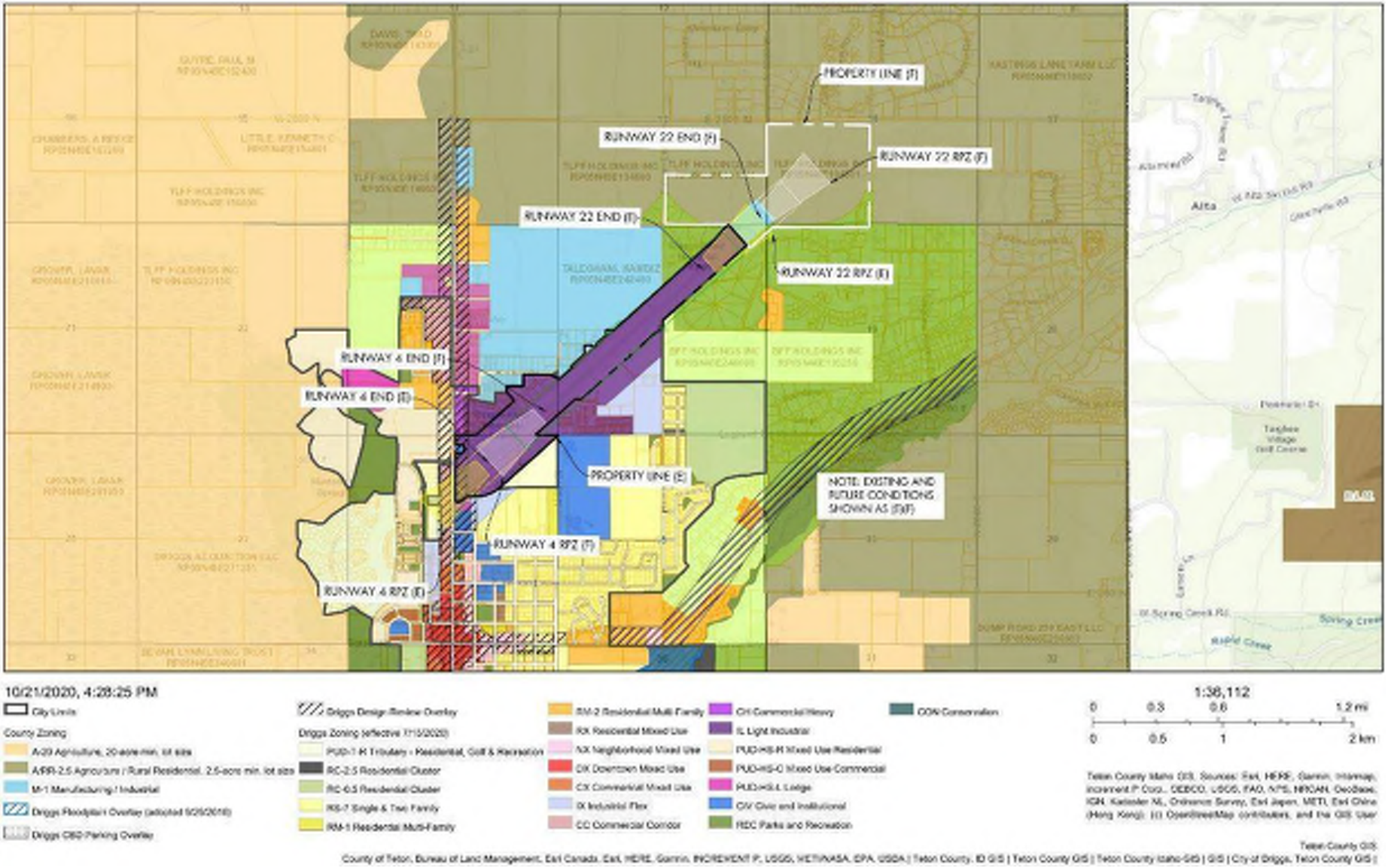
Source: Jviation

Land use on and surrounding the Airport is controlled by the city of Driggs and Teton County. While the Airport property is within Driggs city limits, a portion of the surrounding area of influence is within unincorporated Teton County.

Existing airport property is zoned by the city of Driggs as Commercial Heavy (CH). Land surrounding the Airport is zoned as a mix of agriculture, manufacturing, residential, industrial, civic, and commercial. **Figure 1-4** shows the land use surrounding the Airport.

Additionally, the City has adopted an Airport Overlay District to ensure that land uses established within the vicinity of the Airport would not conflict with the Driggs Comprehensive Plan, Airport Master Plan, or Airport Layout Plan; that sensitive or vulnerable uses will be reasonably protected from airport related activities including noises, hazards and similar conditions; and that the airport and airport related activities are reasonably protected from the encroachment of uses incompatible with the operation of the airport.

Figure 1-1: Land Use Map



Source: City of Driggs

1.3 Purpose and Need

The purpose of the Proposed Action is to improve safety by addressing deficiencies of Runway 4/22 safety areas to bring the southwest end of the Runway into compliance with FAA standards. To accomplish this, improvements and modifications must be made to facilities at the Airport to address deficiencies identified in the Airport Master Plan (2020 AMP).

The Proposed Action is needed because the 2020 AMP completed for the Airport determined that the current RPZ for the Runway 4 approach end extends over N Highway 33, encompasses five residential dwellings, and includes a small portion of an aircraft parking area. Airport control over the land in the RPZ is encouraged by the FAA to achieve the desired protection of people and property on the ground. Although the FAA recognizes that in certain situations the Sponsor may not fully control land within the RPZ, the FAA encourages Sponsors to take all possible measures to protect against and remove or mitigate incompatible land uses. The shift of Runway 4/22 and associated facilities 1,945 feet to the northeast is proposed in order to remove N Highway 33, residences, and the aircraft parking area from the Runway 4 RPZ, and will allow for a Sponsor-controlled RPZ. As a result of the shifting of Runway 4/22, property would be acquired, the existing property fence would be removed, a new wildlife fence installed, and flight procedures would require amendments.

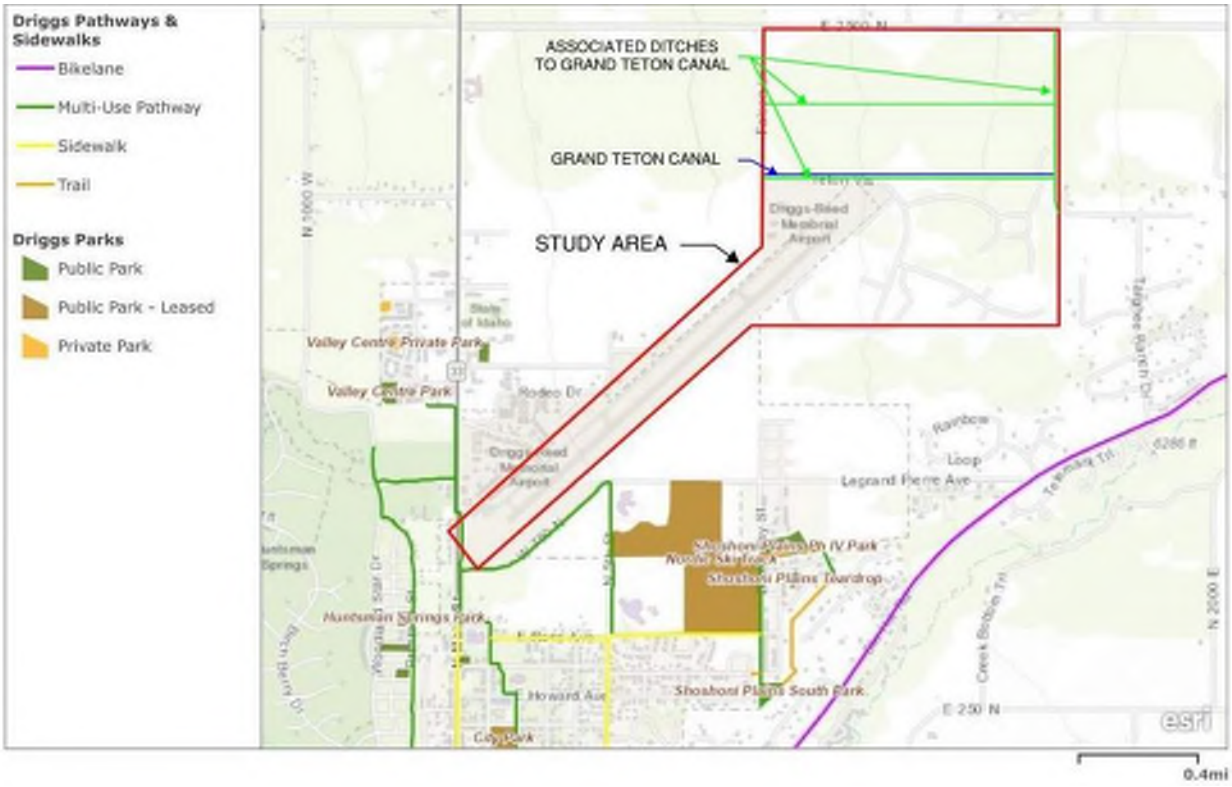
Additionally, the ROFA associated with Runway 4/22 also includes aircraft parking positions, a portion of the FBO building, and surface vehicle parking. FAA AC 150/5300-13A, *Airport Design*, indicates "objects non-essential for air navigation or aircraft ground maneuvering purposes are not to be placed in the OFA." As such, the 2020 AMP recommends that the Runway 4 threshold should be relocated to bring the Airport into compliance with FAA guidelines and standards.

The Proposed Action would bring the Airport into compliance with FAA requirements for the Runway 4 RPZ and ROFA and ultimately increase the safety of the airport, the community, and those operating and living within them.

2. IDENTIFICATION of DOT SECTION 4(f) RESOURCES

DOT Section 4(f) lands are defined as "any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance or land from an historic site of national, state, or local significance."[2] To identify probable DOT Section 4(f) resources, the city of Driggs Parks and Recreation's "Interactive Parks and Recreation Map" as well as Google Earth were used to identify recreational resources within proximity to the Airport, and a review of sites on or eligible for the National Register of Historic Place (NRHP) was conducted. Figure 2-1 shows the location of DOT Section 4(f) resources.

Figure 0-1: DOT Section 4(f) Resources in Proximity to the Airport



Source: City of Driggs, Interactive Parks and Recreation Map, Accessed January 26, 2021 at https://www.driggsidaho.org/parks-and-recreation

2.1 Parks/Recreational/Refuge Resources

Publicly owned land is considered to be a park, recreation area, or wildlife and waterfowl refuge when the land has been officially designated as such by a federal, state or local agency and one of its major purposes is for a park, recreation area, or wildlife and waterfowl refuge.

Several DOT Section 4(f) resources identified as Parks and Recreations were identified in the vicinity of the Airport:

- Valley Centre Park
- Huntsman Springs Park
- Nordic Ski Track (park)
- Shoshone Plains Ph IV Park

[2] 23 U.S.C. 138 *Preservation of Parklands*.

- Shoshoni Plains Teardrop (park)
- Shoshoni Plains South Park
- City Park
- Shoshoni Plains Pathway (trail)
- Multi-use Pathways

Of these resources identified, a portion of a multi-use pathway is located within the Study Area, and is the sole resource located in the Study Area. However, it would not be affected by the land acquisition or construction of the Proposed Action. The environmental condition of the pathway may improve with the shift of the runway and associated traffic to the northeast and away from the pathway.

Based on the background research, field surveys and agency coordination, it has been determined that there is no direct use of publicly owned parks, recreation areas, or wildlife and waterfowl refuges in the project area. No constructive use would occur as a result of the Proposed Action (see **Section 3.1** for constructive use definition). As no uses would occur, no further discussion of recreational resources is required.

2.2 Historic Sites

To identify potential historic sites, a *Class III Cultural Resources Inventory and Architectural History Survey of the Driggs-Reed Memorial Airport* (CRI) per Section 106 of the National Historic Preservation Act (Section 106), was recently completed for the Airport (dated September 2020). The CRI was completed as a supplement to a 2014 CRI to identify and evaluate resources at and abutting the Airport property. Section 106 cultural resources were identified in the Area of Potential Effect (APE) and further evaluated for impacts by the Proposed Action.

Sites and/or structures are defined as historically significant if they meet criteria for eligibility to the NRHP, maintained by the U.S. Department of Interior. Eligibility criteria are summarized as follows:

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

The CRI identified only one previously recorded property within the APE – Site 10TN67 (Grant Teton Canal). Two newly recorded historic-age properties were identified, but are not recommended as eligible for listing on the National Register of Historic Places (NRHP). These properties include the Driggs-Reed Memorial Airport (NRD-1) and Runway 4/22 (FN-35). No archaeological resources were identified in the APE during either survey.

Subsequent portions of this report summarize the Grand Teton Canal. Please refer to the Cultural Resources Inventory (located in **Appendix C** of the EA) for more detailed information on the completed survey and all resources identified.

Grand Teton Canal (10TN67): The Grand Teton Canal is an approximately 6-mile long unlined earthen canal that provides irrigation water to agricultural land in the Teton Valley. Construction on the Grand

Teton Canal began around 1888, prior to the establishment of an official water claim in 1892. The initial water appropriation for the canal was 1281 cubic feet per second (CFS). The water appropriation was expanded by an additional 29.28 CFS in 1916. The approximately 10-foot-wide by 5-foot-deep canal originates at a wood and concrete head gate on Teton Creek in Alta, Wyoming. It continues west across the state line into Idaho where it is diverted into three major laterals to the north, west, and southwest.

Within the project area, the Grand Teton Canal consists of one previously recorded segment measuring approximately 0.72 miles long, which runs east-west along the southern boundary of the project area, and three associated ditches connected to the Grand Teton Canal, which are contributing elements of the larger Grand Teton Canal System. The Grand Teton Canal and interconnected irrigation ditches transect the project area at various locations.

The Grand Teton Canal was originally recorded by S. Crockett in 2002. At that time, Crockett recommended the Canal eligible for listing in the NRHP under Criterion A for its association with the early settlement and establishment of agriculture in the Teton Valley. The segment of the Grand Teton Canal and associated ditches within the current project area retain their integrity of workmanship, materials, design, location, and association. The Grand Teton Canal System continues to be used for irrigation and agriculture. The Canal's integrity of setting has been compromised with the encroachment of residential development which has replaced agricultural uses with scattered residential subdivisions. However, as the Canal retains six aspects of historic integrity, and is still in use for irrigation and agriculture, the previously recorded segment of the Grand Teton Canal located within the project area and associated ditches are contributing elements of the Grand Teton Canal System.

As it is eligible for listing on the NRHP, the Grand Teton Canal is also considered a DOT Section 4(f) resource. Given its location in relation to the Driggs-Reed Memorial Airport and the proposed improvements to correct deficiencies and improve safety at the Airport, there are no practical measures to entirely avoid the Canal and its associated ditches; thus, the Grand Teton Canal and associated ditches would be impacted by the proposed project and will be considered in this evaluation.

3. ALTERNATIVE ANALYSIS

This section describes the methodology used for determining impacts to DOT Section 4(f) resources and provides details on the alternatives considered including potential impacts. Methods to minimize or mitigate impacts to the identified preferred alternative are also included.

3.1 Methodology for Determination of Impacts

Each DOT Section 4(f) resource was evaluated for potential impacts associated with each of the alternatives considered. The potential impact criteria evaluated for each site included direct impacts and constructive use impacts.

Direct Impacts/Physical Use

Direct impacts, or physical "use", refer to physical taking/acquisition of a DOT Section 4(f) resource for incorporation into a transportation project. In determining direct impacts, each proposed alternative was evaluated to determine if it would impact one of the identified DOT Section 4(f) resources.

Indirect Impacts/Constructive Use

"Use" within the context of DOT Section 4(f) includes not only actual physical taking of such property, but also "constructive use." Constructive use occurs when the impacts of a project on a DOT Section 4(f)

property are so severe that the activities, features, or attributes that qualify the property for protection under DOT Section 4(f) are substantially impaired. The definition of constructive use adopted for this study is based on Section 5.3.2 of the desk reference for FAA Order 1050.1F:

> Substantial impairment occurs only when the protected activities, features, or attributes of the DOT Section 4(f) property that contribute to its significance or enjoyment are substantially diminished. This means that the value of the DOT Section 4(f) property, in terms of its prior significance and enjoyment, is substantially reduced or lost. For example, noise would need to be at levels high enough to have negative consequences of a substantial nature that amount to a taking of a park or portion of a park for transportation purposes.

In determining indirect impacts, each proposed alternative was evaluated to determine if construction and/or land acquisition would indirectly impact a DOT Section 4(f) resource.

3.2 Alternatives

The alternatives considered are based on the 2020 AMP, which identified four alternatives addressing the deficiencies identified with the ROFA and Runway 4 RPZ.

The alternatives considered during the early planning process are discussed in **Chapter 3** of the EA. The No Action Alternative, is described on page 21. The action alternatives (Alternatives 1 through 4) consist of various alternatives of Runway displacement and shifts to address the deficiencies with the ROFA and Runway 4 RPZ. These preliminary action alternatives are summarized below.

Preserving the length of Runway 4/22 was an important consideration. As discussed in the 2020 AMP, Runway 4/22 can accommodate most of its current users without aircraft weight limitations at its current length of 7,300 feet. The Airport's higher altitude and current runway length does limit larger aircraft from operating at the Airport with high loads; however the runway accommodates most general aviation corporate aircraft, which represent a large share of users at the Driggs-Reed Memorial Airport. The length of the runway was concluded to be adequate for the Airport in the 2020 AMP, and neither a reduction in length nor an extension was encouraged. Therefore, an alternative to simply shorten Runway 4/22 by 1,945 feet in order to address the identified issues with the Runway 4 RPZ and ROFA was not a prudent alternative, nor were other alternatives that substantially reduced the usable length of the runway.

Preliminary Action Alternatives Considered

Alternative 1 (Runway 4 Displacement) allows for a 1,120-foot displaced threshold on the Runway 4 end of Runway 4/22 with no extension on the Runway 22 end, as shown in Error! Reference source not found. of the EA. A displaced threshold is a threshold located at a point on the runway other than the designated beginning of the runway. The displaced area can be used for taxiing, takeoff, and landing rollout, but not for touchdown. This alternative brings the Runway 4 RPZ fully onto airport property to meet FAA RPZ standards.

Alternative 1 maintains the existing available takeoff distance for Runway 4 but shortens the available landing length to 6,180 feet. This option also reduces the takeoff run available (TORA) distance for Runway 22 to 6,180 feet in order to meet departure RPZ requirements. This alternative does not resolve the issue of the FBO building and airplane parking positions being in the ROFA.

In addition to reducing the TORA of Runway 22, Alternative 1 does not address the deficiencies identified for the ROFA to meet the purpose and need; and, therefore was not carried forward for further analysis in the EA. Consequently this alternative was found not to be prudent and is not considered further.

Alternative 2 (Runway 4/22 Shift of 1,120 feet) shows the Runway 4 threshold relocated 1,120 feet down the runway and an extension of 1,120 feet on the Runway 22 end, effectively shifting the Runway 1,120 feet to the northeast, as shown in Error! Reference source not found. of the EA. This would require property acquisition for the extension and the associated Runway 22 RPZ. Like Alternative 1, this option brings the Runway 4 RPZ fully onto airport property.

The benefit of this option is that it maintains the current runway length of 7,300 feet for both runway directions. However, this option does not resolve the ROFA conflict with the FBO building and airplane parking positions.

Alternative 2 does not address the deficiencies identified for the ROFA to meet the purpose and need; and therefore, was not carried forward for further analysis in the EA. Consequently this alternative was found not to be prudent and is not considered further.

Alternative 3 (Lateral Shift) proposes a lateral shift of Runway 4/22 by 52 feet to the southeast. The new runway would be built to the current length of 7,300 feet to prevent any operational limitations. This shift would correct the ROFA issue with respect to the FBO building but would not address the Runway 4 RPZ issues.

This shift would, however, require property acquisition to the southeast of the runway, significant dirt fill, grading, and paving work and a long-term closure of Runway 4/22.

Alternative 3 does not address the deficiencies identified for the Runway 4 RPZ to meet the purpose and need; and therefore, was not carried forward for further analysis in the EA. Consequently this alternative was found not to be prudent or feasible and is not considered further.

Alternatives Carried Forward for Analysis

No Action Alternative: The No Action Alternative does not include any improvements to the Airport, but the Sponsor would still need to maintain the Airport's current facilities. Under the No Action Alternative, the Runway threshold for Runway 4 would remain in its current location, Runway 4/22 would not be shifted, and no additional land would be acquired. The No Action alternative would not meet the Purpose and Need, and the FAA safety and design standards to ensure compatible land use in the Runway 4 RPZ and ROFA would not be met.

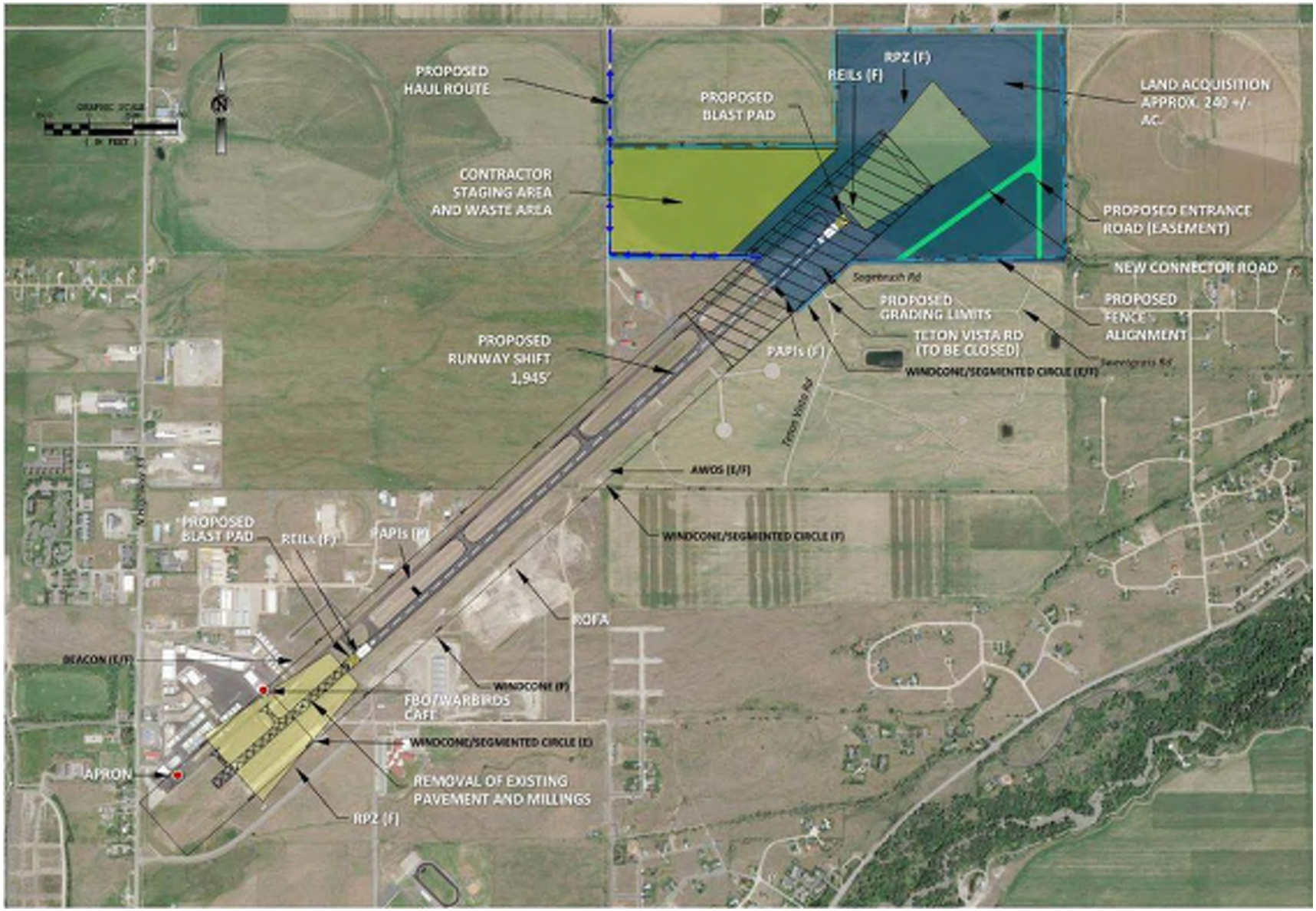
The No Action Alternative has been carried forward for further evaluation as required under FAA Orders 5050.4B and 1050.1F, and pursuant to CEQ regulations (40 C.F.R. §1502.14). However, it would not meet FAA safety and design standards and is inconsistent with existing Airport development plans. Although the No Action Alternative does not meet the Purpose and Need, CEQ and NEPA regulations require evaluation of a No Action Alternative. When compared with the Proposed Action, the No Action Alternative serves as a reference point.

Proposed Action: Relocates the Runway 4 threshold by 1,945 feet to the northeast and extends the Runway by 1,945 feet on the Runway 22 approach end. The specific components of the Proposed Action are shown in **Figure 3-1**. This alternative meets FAA RPZ requirements for the Runway 4 end and maintains the full usable runway length of 7,300 feet. The conflict with the current FBO building and parking positions would also be resolved with this option by shifting the ROFA far enough to remove the FBO conflict. The Proposed Action includes:

1. Acquisition of 245 acres of agriculture land to support the runway shift, relocated runway protection zone, and runway approach/departure surface.
2. Shift Runway 4/22 to the northeast by 1,945 feet:
    a. Extension of runway pavement by 1,945 feet on the northeast end of the runway (Runway 22).
    b. Relocation of the Runway 4 threshold by 1,945 feet.
        i. Removal of existing pavement south of the relocated Runway 4 end.
    c. Relocation of associated Navigational Aids (NAVAIDs) including the Runway 4 and 22 Precision Approach Path Indicators (PAPIs), and Runway 22 Runway End Identifier Lights (REILs), and runway/taxiway lighting and marking.
    d. Extension of existing west partial parallel taxiway by 1,945 feet and new connecting taxiway at relocated Runway 22.
    e. Closure of Teton Vista Road, extension of Sweetgrass Road, and construction of new connector road between Sagebrush and Sweetgrass Roads.
    f. Amending flight procedures to accommodate the shift in runway location.
3. Construction of paved blast pads off ends of each runway.
4. Surface vehicle parking area re-striped to remove parking with ROFA.
5. Relocate the property fence near FBO and parking area outside of ROFA.
6. Remove the existing property fence and construct a new wildlife fence on new property line.

The shift of Runway 4/22 to the northeast would result in the closure of Teton Vista road and would require the construction of a new access road to properties located southeast of the runway. The land southeast of the new runway is divided into two parcels each requiring separate access. The new access road would connect into the existing Sweetgrass Road and provide access to the development south of Sweetgrass road. A connector road would also be constructed to provide access to the parcel currently accessed by Teton Vista road.

Figure 3-1: Proposed Action



Source: Jviation

3.3 Description of DOT Section 4(f) Resources Impacts and Measures to Minimize Harm

No Action Alternative

The No Action Alternative would not affect the Grand Teton Canal or any DOT Section 4(f) resources. However, the No Action Alternative is not a reasonable course of action because it would not meet the Purpose and Need. Moreover, deficiencies identified in the 2020 AMP regarding the Airport's Runway 4 Runway Protection Zone (RPZ) and Runway Object Free Area (ROFA) will remain.

Proposed Action

Grand Teton Canal (10TN67)

Direct Impacts/Acquisition:

The Proposed Action will require placing approximately 2,800 feet of the Grand Teton Canal and associated ditches into numerous culverts (two culverts to shift Runway 4/22 and five culverts for roads) in order to facilitate the shifting of Runway 4/22 and reconfiguring of roads. Placing the Grand Teton Canal and associated ditches into culverts does not affect the vital water conveyance function of the Canal or the Canal System. However, placing the Canal and associated ditches into culverts is a direct impact on the Canal System due to the effect on its historic nature, and therefore result in an "adverse effect" under Section 106 and a "direct use" under DOT Section 4(f).

Indirect Effects/Constructive Use:

The water conveyance function of the Grand Teton Canal System will not be impacted. No project-related constructive use effects would occur under the Proposed Action.

Proposed Mitigation:

The Idaho State University (ISU) is partnering with Idaho State Historical Society (ISHS) to help create an Idaho Irrigation Historic Context and Survey (Context). The ISHS has agreed to pay ISU to undertake this effort as documented in a memorandum of agreement (MOA) between ISHS and ISU that is effective from January 15, 2021 to December 31, 2022. The Context requires preparation of a history of the State's irrigation networks from pre-statehood through the present day. Objectives for the Context include completing a history of the State's irrigation networks, resolving errors and omissions in existing documentation regarding NRHP eligibility of Idaho's network of irrigation systems, and to create a resource to enable efficient completion of Section 106 consultation for federal agencies whose undertakings may effect irrigation networks.

To mitigate the adverse impact of placing approximately 2,800 feet of the Grand Teton Canal and associated ditches into numerous culverts (two culverts to shift Runway 4/22 and five culverts for roads), the city of Driggs, Idaho (Airport Sponsor) will provide $8,000 to the ISHS to contribute to the fund for the Idaho Irrigation Historic Context and Survey.

Contribution to this fund will provide for mitigation to offset adverse impacts to the Grand Teton Canal due to the Proposed Action at the Driggs-Reed Memorial Airport.

Based on the DOT Section 4(f) Evaluation and coordination with the FAA, city of Driggs, and SHPO, a finalized Memorandum of Agreement (MOA) was signed in June 2021 is attached.

4. COORDINATION

Coordination among the FAA, SHPO, the city of Driggs, the Grand Teton Canal Company, Indian Tribes, and public has been conducted in the past and during the EA process and is summarized below.

4.1 Coordination with the FAA and State Historic Preservation Office

Coordination with the FAA and SHPO took place to identify historic resources, the respective impacts due to the Proposed Action, and all practical planning measures to avoid impacts to identified historic resources; in this case, the Grand Teton Canal. Coordination included:

- Several meetings and conference calls with the project team to confirm the area of potential impact, project alternatives, and eligible resource site boundaries.
- Discussions between the FAA and SHPO to discuss eligibility of the Grand Teton Canal and effects determinations outlined in the Section 106 Cultural Resources Inventory. In a letter dated December 10, 2020, the FAA determined that placing the NRHP-eligible Grand Teton Canal into multiple culverts will constitute an Adverse Effect to Historic Properties.
- In a letter dated February 23, 2021, SHPO concurred (**Attachment 1**) with the recommended determination of adverse effect to historic resources under Section 106.
- SHPO was a signatory on the MOA (**Attachment 3**).
- FAA notified the Advisory Council on Historic Preservation (ACHP) on March 5, 2021 to provide information and an invitation to participate in the Section 106 consultation. A response was received from ACHP on March 16, 2021, declining the invitation to participate unless circumstances change and their participation is needed (see **Attachment 2**).

4.2 Coordination with Indian Tribes

To seek input on properties of cultural or religious significance that may be affected by the Proposed Action, participate in government-to-government consultation, or provide comment on the proposed improvements, the FAA contacted the Confederated Tribes of the Warm Springs Reservation of Oregon, the Fort Belknap Indian Community, the Shoshone Bannock Tribes, and the Shoshone Tribe of the Wind River Reservation in letters dated November 4, 2020. No responses were received, aside from one request for an electronic copy of the surveys.

4.3 Coordination with Owners of DOT Section 4(f) Resources

The Grand Teton Canal is owned by the Grand Teton Canal Company Ltd. (Canal Company). Ongoing negotiations with the city of Driggs and the Canal Company have occurred for many years. Agreements have been negotiated and signed over the years beginning in 1991 in anticipation of bridging or placing the Grand Teton Canal into culverts in order to lengthen the runway, expand the Airport, or make other improvements. The most recent agreement on file is dated February 3, 2004, between the city of Driggs and the Canal Company. The agreement discusses placing the Canal into culverts to allow improvements to take place at the Airport, to include “lengthening the runway, installing a taxiway, and generally enlarging the airport” with the explicit assurance to water users that “the runway improvement will not, now or in the future, compromise the water delivery systems.”

The Canal Company was contacted regarding the Proposed Action as part of the EA and responded in an email dated March 3, 2021. The email stated that the Canal Company has no objections to the previous agreements in place or the Proposed Action. As a result, there is no need for an updated agreement to implement the Proposed Action. The Canal Company requests the ability to approve the design of the

future culvert prior to construction. See **Appendix I** in the EA for correspondence with the Grand Teton Canal Company and city of Driggs.

4.4 Coordination with the Public

Airport Master Plan:

The Airport completed an Airport Master Plan (AMP) Update in 2020. The Proposed Action was discussed as a solution to the recommendations found in the facility recommendations chapter. As part of the AMP process, several meetings with the planning advisory committee (PAC) were held to discuss the shortcomings identified in the AMP and the proposed solutions, to include the Proposed Action. These meetings were advertised and open to the public. **Table 4-1** provides a summary of public meetings and **Appendix J** in the EA provides a copy of meeting agendas or presentations presented.

Table 4-1: AMP Meetings

Date	Meeting Purpose
October 10, 2018	AMP Kick-off Meeting.
February 11, 2019	PAC Meeting - Project introduction
July 8, 2019	PAC Meeting – Project discussion, to include review of alternatives and Proposed Action
September 3, 2019	Strategic Planning Meeting – Discussion of future Airport development
February 10, 2020	PAC Meeting – Discussion of future alternatives and Proposed Action
September 14, 2019	AMP Public Open House
June 8, 2020	Airport Board Meeting – Discussion of future alternatives and Proposed Action

Source: Jviation

In addition to the meetings associated with the AMP, a survey requesting input from Airport tenants and users was completed throughout the AMP (see **Appendix J** of the EA for survey). The survey notified the tenants and users of the AMP and requested input on facility needs.

Draft EA:

The Draft EA was released for public comment on June 20th, 2021 through a Public Notice in the Post Register. The Notice included the opportunity for the public to submit written comments on the Proposed Action. Comments were accepted through July 20th, 2021. The Draft EA was available for review online at https://www.driggsidaho.org/driggs-reed-memorial-airport, a hardcopy was available upon request, or could be viewed at the following locations:

Driggs City Hall
PO Box 48
60 South Main St.
Driggs, Idaho 83422

Those wanting to provide comments on the Draft EA were asked to address them to the following physical and email addresses:

Jviation, a Woolpert Company
Attn: Morgan Einspahr
720 S. Colorado Blvd., Suite 1200-S
Glendale, CO 80246
morgan.einspahr@woolpert.com

The deadline for comment submission was no later than 5:00 pm Mountain Standard Time on July 20th, 2021. All mailed comments must have been received by the deadline, not simply postmarked by the date. It was asked that when submitting comments, the respondents please include their address, phone number, email address, or other identifying information. They were advised that the entire comment – including personal identifying information – may be made publicly available at any time.

5. FINDING

After careful and thorough consideration, the FAA determined that there are no feasible and prudent alternatives to the use of DOT Section 4(f) resources. As demonstrated in Section 3 of this Evaluation, the Proposed Action includes efforts to minimize impacts to DOT Section 4(f) resources by ensuring that the vital water conveyance function of the Grand Teton Canal System remains intact. Mitigation for adverse impacts to the Grand Teton Canal due to the Proposed Action will be the contribution of $8,000 to the Idaho State Historical Society (ISHS) to contribute to the fund for the Idaho Irrigation Historic Context and Survey as outlined in the attached MOA (dated June 2021) as mitigation under Section 106 (see **Attachment 3**).

Attachment 1:

State Historic Preservation Office (SPHO) Letter dated February 23, 2021

IDAHO STATE HISTORICAL SOCIETY
Celebrating 140 YEARS OF SERVICE

23 February 2021

Brad Little
Governor of Idaho

Janet Gallimore
Executive Director
State Historic
Preservation Officer

Administration:
2205 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2682
Fax: 208.334.2774

Idaho State Museum:
610 Julia Davis Dr.
Boise, Idaho 83702
208.334.2120

Idaho State Archives and State Records Center:
2205 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2620

State Historic Preservation Office:
210 Main St.
Boise, Idaho 83702
208.334.3861

Old Idaho Penitentiary and Historic Sites:
2445 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2844

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Diane Stilson, P.E.
Federal Aviation Administration
Helena Airports District Office
2725 Skyway Drive
Suite 2
Helena, Montana 59602-1213
diane.stilson@faa.gov

Via Email

RE: Class III Cultural Resources Inventory and Architectural History Survey of the Driggs-Reed Memorial Airport / SHPO Rev. No. 2021-179

Dear Ms. Stilson :

Thank you for consulting with our office on the above referenced project. The State Historic Preservation Office is providing comments to the Federal Aviation Administration pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR § 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

It is our understanding that the scope of the undertaking will include runway improvements, including placing the Teton Canal (10TN67) in multiple culverts to allow for the runway to be extended at the Driggs-Reed Memorial Airport in Driggs, Teton County, Idaho

After review of the documentation provided, we concur with the following proposed eligibility determinations: Driggs-Reed Memorial Airport (NRD-1) and Runway (FN-35) are not eligible for listing in the National Register of Historic Places (NRHP). The Teton Canal (10TN67) is eligible for listing in the NRHP.

Pursuant to 36 CFR § 800.5, we have applied the criteria of effect to the proposed undertaking. Based on the information received 10 December 2020 and 3 February 2021, we concur the proposed project actions will have **an adverse effect to historic properties.**

In the event that cultural material is inadvertently encountered during implementation of this project, work shall be halted in the vicinity of the finds until they can be inspected and assessed by the appropriate consulting parties.

Thank you for the opportunity to comment. Please note that our response does not affect the review timelines afforded to other consulting parties. Additionally, information provided by other consulting parties may cause us to revise our comments. We look forward to working with you, as well as other consulting parties (e.g. Teton County CLG, Preservation Idaho, and others) to avoid, minimize or mitigate this adverse effect. To learn more about the mitigation process please visit: https://history.idaho.gov/section-106/mitigation-process/. If you have any questions or the scope of work changes, please contact me via phone or email at 208.488.7463 or ashley.brown@ishs.idaho.gov.

Sincerely,

Ashley Brown, M.A.
Historical Review Officer
Idaho State Historic Preservation Office

Attachment 2:

Advisory Council on Historic Preservation (ACHP) Letter dated March 16, 2021

March 16, 2021

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

Ref: *Proposed Land Acquisition and Shift of Runway 4/22 at Driggs-Reed Memorial Airport*
Driggs, Teton County, Idaho
ACHP Project Number: 16627

Dear Ms. Stilson:

On March 5, 2021, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer, Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

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

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact Mr. Anthony G. Lopez at (202) 517-0220 or by email at alopez@achp.gov and reference the ACHP Project Number above.

Sincerely,

LaShavio Johnson

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

Attachment 3:

Memorandum of Agreement (MOA) dated June 2021

MEMORANDUM OF AGREEMENT

AMONG THE
FEDERAL AVIATION ADMINISTRATION,
CITY OF DRIGGS, IDAHO,
AND THE IDAHO STATE HISTORIC PRESERVATION OFFICE
REGARDING

THE PROPOSED LAND ACQUISITION AND SHIFT OF RUNWAY 4/22 AT DRIGGS-REED MEMORIAL AIRPORT AT DRIGGS, IDAHO

WHEREAS the Federal Aviation Administration (FAA) is considering funding for the acquisition of land, shifting of Runway 4/22, and associated improvements (the undertaking) at the Driggs-Reed Memorial Airport (Airport) at Driggs, Idaho, pursuant to 49 USC § 47107(a)(16), FAA Order 5100.38D, Airport Improvement Program Handbook; and

WHEREAS the undertaking consists of the acquisition of approximately 245 acres of agricultural land, shifting of Runway 4/22 by 1,945 feet to the northeast, relocation of the property fence and navigational aids, construction of blast pads, amendment of flight procedures, and reconfiguration of roads (layout included in Appendix A); and

WHEREAS, the FAA has determined that this undertaking is subject to the National Environmental Policy Act (NEPA) as well as the National Historic Preservation Act (NHPA) and its implementing regulations under Section 106 36 CFR part 800 (as amended); and

WHEREAS, the FAA is the lead agency for complying with NEPA; Section 106 of the NHPA as amended (16 USC 470f), and the regulations implementing Section 106 of the NHPA (36 CFR Part 800); and Government to Government consultation under Executive Order 13175; and

WHEREAS, the 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 may have an adverse effect on the Grand Teton Canal (10TN67), which is eligible to the National Register of Historic Places (NRHP) under Criteria A. The Canal and associated ditches, which are contributing features to the Canal, are proposed, as part of the undertaking, to be placed in numerous culverts to facilitate the shifting of Runway 4/22 and the reconfiguration of roads.

WHEREAS, the FAA has consulted with the Idaho 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 Confederated Tribes of the Warm Springs Reservation of Oregon, the Fort Belknap Indian Community, the Shoshone Bannock Tribes, and the Shoshone Tribe of the Wind River 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 responses from any of the Tribes aside from one request for an electronic copy of the Cultural Resource Inventories; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FAA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation regarding the Grant Teton Canal (10TN67) and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, the FAA, the SHPO, and the City of Driggs 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

The Idaho State University (ISU) is partnering with Idaho State Historical Society (ISHS) to help create an Idaho Irrigation Historic Context and Survey (Context). The ISHS has agreed to pay ISU to undertake this effort as documented in a memorandum of agreement (MOA) between ISHS and ISU that is effective from January 15, 2021 to December 31, 2022. The Context requires preparation of a history of the State's irrigation networks from pre-statehood through the present day. Objectives for the Context include completing a history of the State's irrigation networks, to resolve errors and omissions in existing documentation regarding NRHP eligibility of Idaho's network of irrigation systems, to create a resource to enable efficient completion of Section 106 consultation for federal agencies whose undertakings may affect irrigation networks, and to complete a survey to inform a Multiple Property Documentation NRHP nomination.

To mitigate the adverse effect of placing approximately 2,800 feet of the Grand Teton Canal (10TN67) and associated ditches into numerous culverts (two culverts to shift Runway 4/22 and five culverts for roads), the City of Driggs, Idaho (Airport Sponsor) will provide $8,000 to the ISHS to contribute to the fund for the Idaho Irrigation Historic Context and Survey.

Contribution to this fund will provide for mitigation for the adverse effect to the Grand Teton Canal due to the Proposed Action at the Driggs-Reed Memorial Airport.

II. MONITORING AND REPORTING

The City of Driggs will notify the FAA when it completes the contribution to the fund for the Idaho Irrigation Historic Context and Survey. Upon receipt of confirmation, the FAA will notify the SHPO.

III. 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 VI to resolve the issue.

IV. 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 Teton County Coroner in accordance with Idaho Code Title 19, Chapter 43, Sections 19-4301. The Coroner is responsible to determine the cause and manner of death of any person who dies in Teton County. The Coroner should make every reasonable effort to gather evidence at the site without disturbing the remains. After all the evidence is gathered, the Coroner will write a report and present it to the family, if identified, and law enforcement. If it is determined that a crime has been committed, then the Coroner's report will be turned over to the Prosecuting Attorney. The Coroner should notify the SHPO of the findings within 48 hours. The SHPO will notify the Tribes (if applicable) and coordinate with FAA. The FAA will consult with all signatories to the MOA to determine if and when construction activities in the location of the discovery may resume.

V. DURATION

This MOA will be null and void if its terms are not carried out within (5) years from the date of its execution. Prior to such time, the FAA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VII below.

VI. DISPUTE RESOLUTION

Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the FAA shall consult with such party to resolve the objection. If the FAA determines that such objection cannot be resolved, the FAA will:

A. Forward all documentation relevant to the dispute, including the FAA's proposed resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. The FAA will then proceed according to its final decision.
B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FAA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA, and provide them and the ACHP with a copy of such written response.
C. The FAA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VII. 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.

VIII. 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 VII, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

B. Once the MOA is terminated, and prior to work continuing on the undertaking, the FAA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) execute a PA pursuant to 36 CFR § 800.14 or (c) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. The FAA shall notify the signatories as to the course of action it will pursue.

C. Execution of this MOA and implementation of its terms evidence that the FAA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

UNITED STATES OF AMERICA
FEDERAL AVIATION ADMINISTRATION

STEVEN L ENGEBRECHT Digitally signed by STEVEN L ENGEBRECHT Date: 2021.06.14 17:14:57 -06'00' Date: June 14, 2021

Steve Engebrecht, Acting Manager
Helena Airports District Office

IDAHO STATE HISTORIC PRESERVATION OFFICE

Digitally signed by Tricia Canaday Date: 2021.06.15 10:22:10 -06'00' Date:

Tricia Canaday
Deputy State Historic Preservation Officer

CITY OF DRIGGS, IDAHO

Date: 6/14/2021

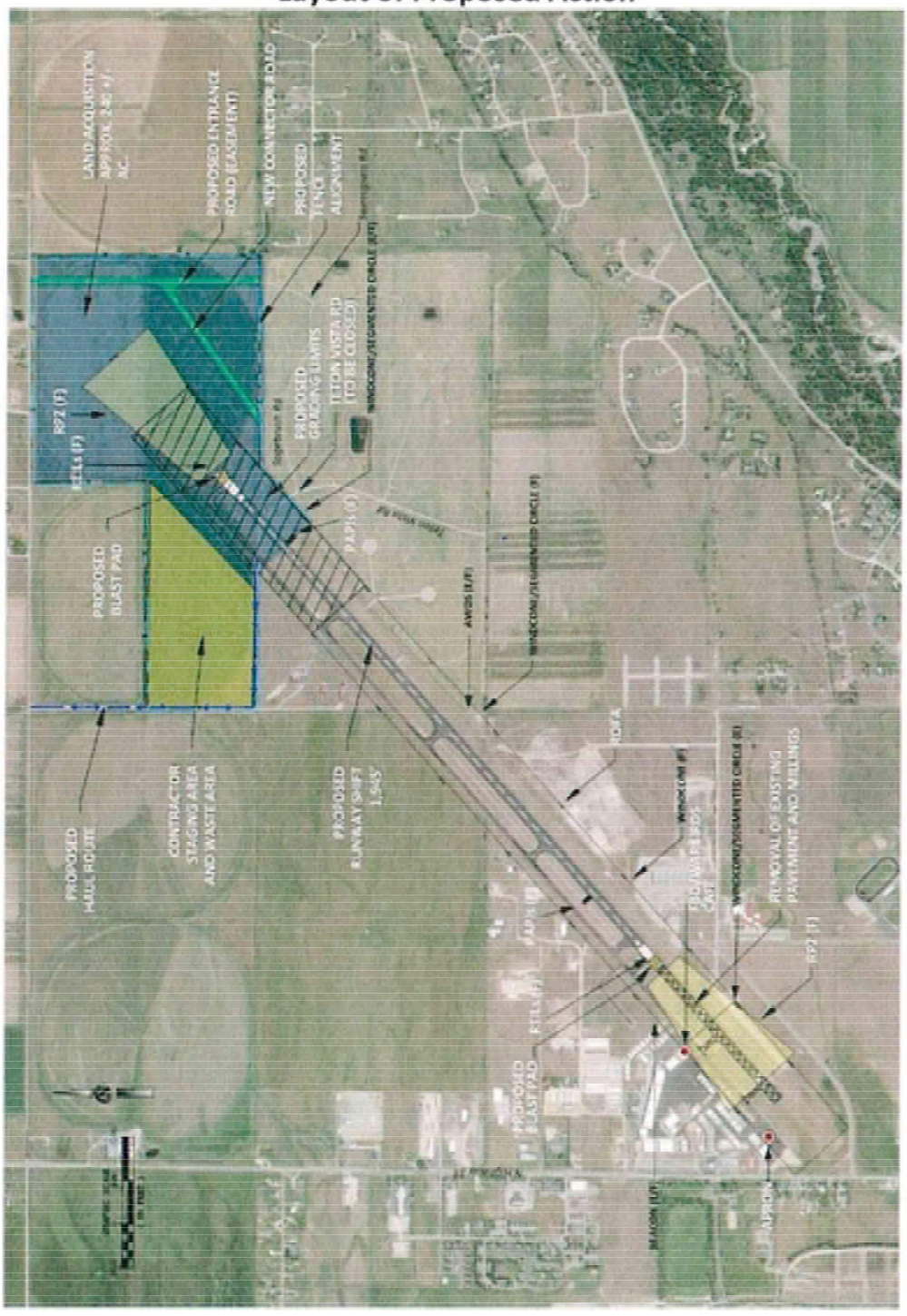
Hyrum Johnson
Mayor

APPENDIX A

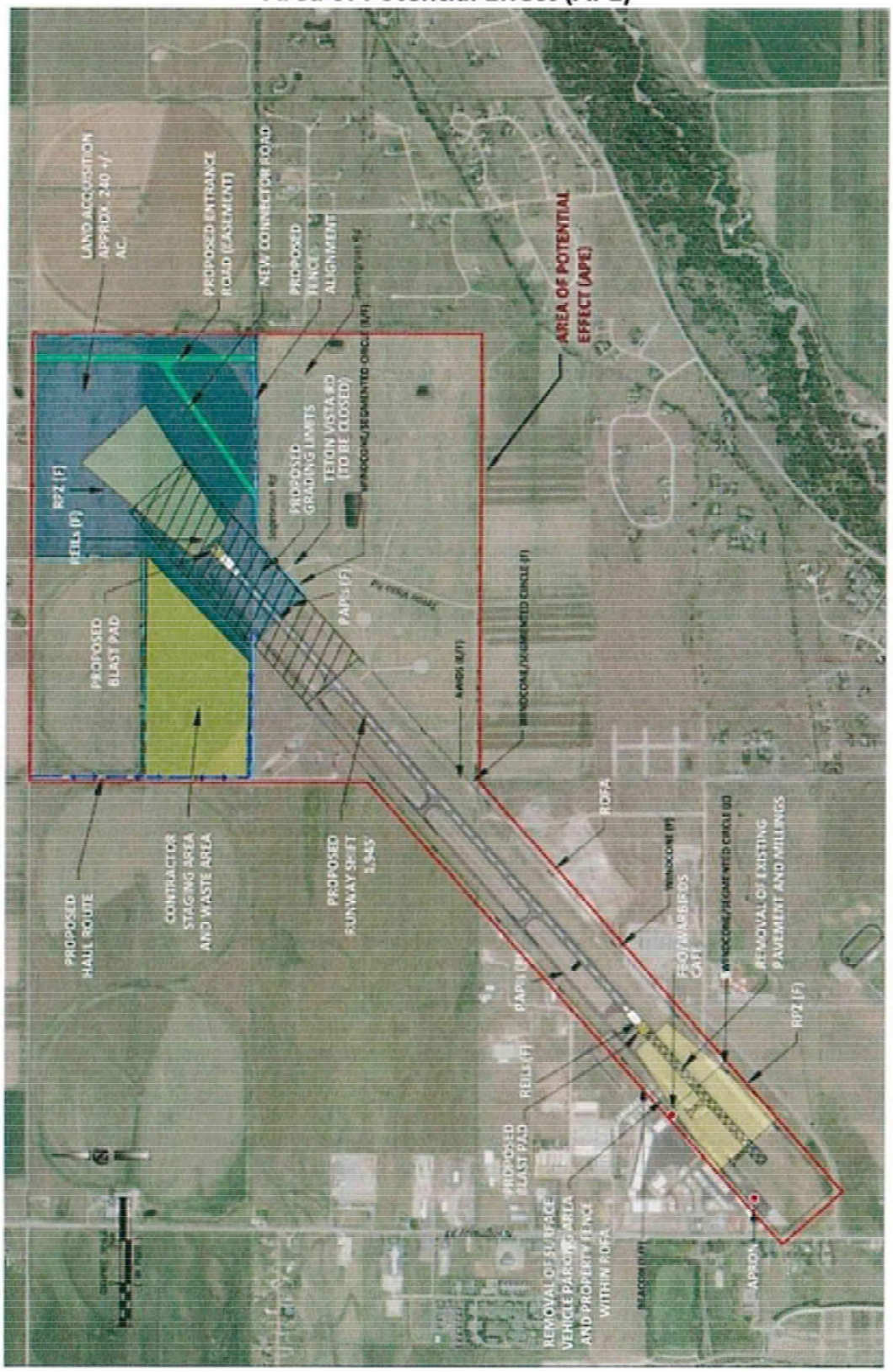
TO THE MEMORANDUM OF AGREEMENT REGARDING THE PROPOSED LAND ACQUISITION AND SHIFT OF RUNWAY 4/22 AT DRIGGS-REED MEMORIAL AIRPORT AT DRIGGS, IDAHO

Project Layout and Area of Potential Effect (APE)

Layout of Proposed Action



Area of Potential Effect (APE)



APPENDIX B

TO THE MEMORANDUM OF AGREEMENT REGARDING THE PROPOSED LAND ACQUISITION AND SHIFT OF RUNWAY 4/22 AT DRIGGS-REED MEMORIAL AIRPORT AT DRIGGS, IDAHO

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
- Human skeletal remains and/or bone fragments which may be whole or fragmented.

In the event that previously unknown cultural resources are discovered within the Area of Potential Effects from construction activities of the undertaking, or should those activities directly or indirectly impact known historic properties in an unanticipated manner, the following actions, at a minimum, will be initiated by the FAA, or a representative duly authorized to perform these tasks:

1. All activities will halt in the immediate vicinity of the discovery and all actions that might adversely affect the property will be redirected to an area at least 200 feet from the point of discovery.

2. The FAA and the City of Driggs 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, City of Driggs, 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 City of Driggs, 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: Diane Stilson, HLN ADO - (406) 441-5411
City of Driggs: Chris Schuehler, Driggs-Reed Memorial Airport Manager - (208) 354-2362
SHPO: Ashley Brown, Historical Review Officer – (208) 488-7463