

**FEDERAL AVIATION ADMINISTRATION**



**FINDING OF NO SIGNIFICANT IMPACT/ RECORD OF DECISION**

for the Proposed  
Airport Traffic Control Tower (ATCT) Replacement  
at  
Barkley Regional Airport (PAH), Paducah, Kentucky

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**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
FINDING OF NO SIGNIFICANT IMPACT AND RECORD OF DECISION  
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT  
BARKLEY REGIONAL AIRPORT (PAH), PADUCAH, KENTUCKY**

**I. INTRODUCTION**

This document is the Federal Aviation Administration’s (FAA) Finding of No Significant Impact/Record of Decision (FONSI/ROD) for the proposed Airport Traffic Control Tower (ATCT) Replacement at Barkley Regional Airport (PAH). This FONSI/ROD is based on the information and analysis contained in the attached Final Environmental Assessment (EA), dated April 2025. This Final EA also tiers off of the Bipartisan Infrastructure Law-funded Final Programmatic EA (ATCT Final PEA) and FONSI/ROD issued in October 2023 (FAA, 2023). This Final PAH EA has been prepared in accordance with the guidelines and requirements set forth by the Council on Environmental Quality (CEQ) and the FAA to implement the environmental review and disclosure provisions of the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [U.S.C.] § 4321 et seq.); FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and the Fiscal Responsibility Act of 2023 (Public Law 118-5).

The Infrastructure Investment and Jobs Act (Public Law 117-58), enacted on November 15, 2021, appropriated \$25 billion over a five-year period (Fiscal Year 2022-2026) for airport and air traffic control projects. The FAA established the ATCT Replacement Program to replace existing FAA-owned ATCTs at mainly non-major airports with modern ATCT facilities.

As detailed in the ATCT Final PEA and FONSI/ROD, the FAA identified and analyzed potential environmental impacts for the broad scope of actions planned for ATCT replacement activities. This programmatic approach allows the FAA to review project-specific details and potential impacts during the planning and site selection process for those ATCT projects within the scope of the PEA analysis. The ATCT Final PEA and FONSI/ROD identified the following resource categories as having “no significant impact” (FAA, 2023):

- Air Quality – The proposed action would result in a short-term and temporary increase in emissions and dust (particulate matter) during construction and demolition activities. In addition, a long-term reduction in emissions from reduced energy use is expected from the new ATCT.
- Climate – The proposed action would result in a short-term increase in greenhouse (GHG) emissions during construction and demolition activities, and a long-term reduction in GHG emissions from reduced energy use the new ATCT.
- Farmlands – The proposed action is not within prime farmland and would not involve the disturbance, conversion, or removal of any prime farmland.
- Hazardous Materials, Solid Waste, and Pollution Prevention – The proposed action would result in short-term and temporary impacts during construction and use of fuels and chemicals, and short-term and temporary impacts from demolition and removal of waste or other unknown materials from the existing (older) ATCT site.

- Land Use – The proposed action would not require any changes to land use as described in the airport master plan.
- Natural Resources and Energy Supply – The proposed action would result in long-term beneficial impacts from reductions in energy use.
- Noise – The proposed action would result in short-term impacts during construction and demolition activities from equipment and vehicle noise.
- Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety Risks – The proposed action would result in short-term impacts during construction and demolition from minimal increases in employment, materials, or equipment purchases.

The Final EA included site-specific analyses for the six resource areas not covered by the ATCT Final PEA and FONSI/ROD; these are historic and cultural resources, visual effects, coastal resources, biological resources, Section 4(f) resources, and water resources. In addition, the Final EA analyzed cumulative effects in or near the project area.

## **II. PROPOSED ACTION**

The FAA’s Proposed Action is to replace the existing ATCT with a modern ATCT at PAH airport. The following activities are anticipated as part of the Proposed Action:

- Acquisition of a new lease with the airport authority to construct an ATCT in a new location.
- Unconditional approval of portions of the Airport Layout Plan that depict those portions of the Proposed Project Subject to FAA review and approval pursuant to 49 USC § 47107 (a)(16).
- Construction and operation of a replacement ATCT, administrative base building, and other associated facility support features such as a parking area and security fencing.
- Extension of access roads and utilities to the replacement ATCT.
- Installation of modern air traffic control electronic equipment in the replacement ATCT.
- Commissioning of the replacement ATCT, cutover of air traffic services to the replacement ATCT, and decommissioning of the existing ATCT.
- Demolition and disposal of existing ATCT facilities and associated infrastructure.
- Modification and/or relocation of existing National Airspace System (NAS) facilities or airport structures necessary to enable project implementation.

## **III. PURPOSE AND NEED OF THE PROPOSED ACTION**

The ATCT serves as an observation facility for air traffic controllers to monitor aircraft take-offs and landings and ground traffic visually and electronically within the PAH airfield. Air traffic controllers within the PAH ATCT facility ensure aircraft are properly separated and enhance the safety of aircraft operations at and in the vicinity of PAH airport.

Section 2 of the Final EA stated the purpose and need of the Proposed Action, which tiers from the purpose and need described in the ATCT Final PEA. The purpose of the Proposed Action is to replace the PAH ATCT with a modern ATCT providing for uninterrupted air traffic control services. The PAH ATCT is an FAA-owned ATCT eligible for replacement under the ATCT Replacement Program.

The Proposed Action for the PAH ATCT would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements. The replacement ATCT at PAH would enable the installation of upgrades to the latest air traffic control technologies, installation of modern amenities, and meet personnel space requirements.

The FAA recognizes the need to provide continual air traffic control services at PAH. The PAH ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, lacks the personnel space requirements, and modern amenities. Improvements made to rectify this situation would ensure uninterrupted air traffic control services to maintain the safety of the NAS.

#### **IV. ALTERNATIVES CONSIDERED**

The following provides a summary of the alternatives development process and alternatives considered.

**Identification and Evaluation of Potential Alternatives** – The FAA identified criteria to select and evaluate alternatives (as described in Section 3.2 of the ATCT Final PEA). These included ATCT technical criteria and other characteristics to meet the purpose and need. The PAH Final EA considered the proposed replacement and/or upgrade of the ATCT for uninterrupted air traffic control services, while improving the safety, efficiency, and resiliency of the NAS.

**Alternatives Analyzed in the Final EA** – In addition to the Proposed Action, the Final EA analyzed the No Action Alternative. Under the No Action Alternative, replacement and demolition of the existing ATCT and associated facilities would not occur. The existing ATCT would continue to be in use for air traffic control operations. Construction of a new ATCT would not occur, additional space for air traffic operations and new, modern equipment would not be available, and improvements to the safety, efficiency, and resiliency of the NAS would not be realized at PAH Airport. The No Action Alternative, consistent with FAA Order 1050.1F, serves as a baseline against which the impacts of Alternative 2 are compared and contrasted in the Final EA. The No Action Alternative would not meet the purpose and need for the project.

**Alternative 2 (Proposed Action).** The Final EA evaluated this alternative for proposed replacement of the FAA-owned ATCT and associated structures at PAH Airport meeting the purpose and need (described above) for uninterrupted air traffic control services, while improving the safety, efficiency, and resiliency of the NAS. Upon construction and commissioning of the new replacement ATCT and cutover of air traffic control services, the existing facilities would be decommissioned and demolished, and the sites would be restored to their original condition and transferred back to the Airport sponsor.

#### **V. ENVIRONMENTAL CONSIDERATIONS AND MITIGATION**

The FAA identified and evaluated potential environmental impacts in the PAH Airport ATCT Replacement Final EA. The Proposed Action will not change flight patterns, altitudes, or aircraft traffic volumes. Noise levels will be unchanged. This Final EA tiers off of the ATCT Final PEA and FONSI/ROD (FAA, 2023) which identified that ATCT replacement is not anticipated to have significant impacts to air quality; climate; compatible land uses; farmlands; hazardous materials, solid waste, and pollution prevention; noise;

socioeconomics, environmental justice<sup>1</sup>, and children's environmental health and safety risks; or natural resources and energy supply. A site-specific evaluation validated that significant impacts are not anticipated for these resource categories. The Proposed Action is not anticipated to result in significant cumulative impacts.

The Final EA included site-specific analyses for the six resource areas not covered by the findings of the October 2023 ATCT Final PEA and FONSI/ROD: historic and cultural resources, visual effects, coastal resources, biological resources, Section 4(f) resources, and water resources. The Final EA also includes an analysis of cumulative effects. The Proposed Action is not anticipated to have any impact on historic and cultural resources, visual effects, coastal resources and Section 4(f) resources. Short term construction activities would have temporary, minor impacts to biological resources and water resources from ground disturbing activities. The Proposed Action is not anticipated to result in significant cumulative impacts on the human health of the environment.

Best management practices and mitigation measures were identified in the Final EA; none are necessary to reduce potentially significant impacts below applicable significance thresholds. Based on the analysis within this Final EA, the FAA has determined there would be no significant impact to the human environment from implementation of the Proposed Action.

## **VI. FINDING**

After careful and thorough consideration of the facts contained herein and the attached Final EA, the undersigned finds that the Proposed Action is consistent with existing national environmental policies and objectives as set forth in Section 101 of NEPA and other applicable requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation to Section 102(2)(C) of NEPA. As a result, FAA will not prepare an Environmental Impact Statement.

Based on the administrative review of this project, I certify, as prescribed by 49 U.S.C. 44502(b) that implementation of the Proposed Action is reasonably necessary for use in air commerce.

Having met all relevant requirements for environmental considerations and consultation, and under the authority delegated to me by the Administrator of the FAA, I approve the Proposed Action described in the Final EA and in this FONSI/ROD and authorize the Proposed Action to be undertaken at such time as other requirements have been met.

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<sup>1</sup> On January 21, 2025, President Trump issued Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*. At that time, the NEPA process for this project was already underway and FAA's draft EA had been issued and reflected the expected scope and content of analysis in this NEPA process to include analysis of environmental justice. Due to the rescission of prior Executive Orders regarding environmental justice and the recent action by the Council on Environmental Quality (CEQ) to rescind the NEPA implementing regulations, it is no longer a legal requirement or the policy of the federal government to conduct an environmental analysis. Any prior data gathering, analysis, or discussion regarding environmental justice is not relevant for purposes of evaluating the NEPA significance of this project, nor did it play any role in agency decision-making.

APPROVED BY:

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John L. Smith  
Infrastructure Engineering Group Manager  
Central Service Area  
Federal Aviation Administration

#### **RIGHT OF APPEAL**

This FONSI/ROD presents the Federal Aviation Administration's final decision and approvals for the actions identified, including those taken under provision of 49 U.S.C. Subtitle VII, Parts A and B. This FONSI/ROD constitutes a final order of the Administrator and is subject to the exclusive judicial review by the U.S. Circuit Courts of Appeals for the District of Columbia or the U. S. Circuit Court of Appeals for the circuit in which the person contesting the decision resides or has its principal place of business in accordance with the provisions of 49 U.S.C. Section 46110. Any person having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. 46110. Any party seeking to stay implementation of the ROD must file an application with the FAA prior to seeking judicial relief as provided in Rule 18(a) of the Federal Rules of Appellate Procedure.