Airport Traffic Control Tower (ATCT) Replacement Program

Lawton-Fort Sill Regional Airport (LAW) ATCT Draft Tiered Environmental Assessment (EA)

Lawton, Oklahoma

May 2025

This page intentionally left blank

Table of Contents

Figures

Tables

ACRONYMS AND ABBREVIATIONS

BIL.....Bipartisan Infrastructure Law
BMP .....Best Management Practice
CEQ .....Council on Environmental Quality
CFR.....Code of Federal Regulations
CO_2 .....Carbon Dioxide
DOT.....Department of Transportation
EA .....Environmental Assessment
EPA.....U.S. Environmental Protection Agency
ESA.....Endangered Species Act
FAA.....Federal Aviation Administration
FBO .....Fixed Base Operator
FEMA.....Federal Emergency Management Agency
FHWA.....Federal Highway Administration
FONSI.....Finding of No Significant Impact
GHG.....Greenhouse Gas
HABS.....Historical American Building Survey
IIJA .....Infrastructure Investment and Jobs Act
LOS.....Line-of-Sight
NEPA.....National Environmental Policy Act
NFIP.....National Flood Insurance Program
NHPA.....National Historic Preservation Act of 1966
NO_2.....Nitrogen Dioxide
NPDES.....National Pollutant Discharge Elimination System
NPL.....National Priorities List
NPS.....National Park Service
NRCS.....Natural Resources Conservation Service
NRHP.....National Register of Historic Places
OAS.....Oklahoma Archaeological Survey
OSHA .....Occupational Safety and Health Administration
PEA.....Programmatic Environmental Assessment
PM.....Particulate Matter
ppm.....parts per million
ROD.....Record of Decision
SEA .....Supplemental Environmental Assessment
SHPO.....State Historic Preservation Officer
SO_2.....Sulfur Dioxide
TCP.....Traditional Cultural Property
THPO .....Tribal Historic Preservation Officer
USACE .....U.S. Army Corps of Engineers
U.S.C. .....U.S. Code
USDA.....U.S. Department of Agriculture
USFWS .....U.S. Fish and Wildlife Service
USGS .....U.S. Geological Survey

SECTION 1 | INTRODUCTION

1.1 OVERVIEW

The Federal Aviation Administration (FAA) is proposing to replace the existing Airport Traffic Control Tower (ATCT) at Lawton-Fort Sill Regional Airport (LAW). The Infrastructure Investment and Jobs Act (IIJA; Public Law [P.L] 117-58) enacted on November 15, 2021, formerly referred to as the Bipartisan Infrastructure Act (BIL), appropriated $25 billion (B) over a five-year period (Fiscal Year 2022 [FY22] to 2026 [FY26]) for National Airspace (NAS) improvements, which includes airport traffic control and other airport infrastructure projects. As a result, the FAA Air Traffic Organization (ATO) established a dedicated ATCT Replacement Program to use the IIJA funding to replace existing FAA-owned ATCTs at mainly non-major airports with modern ATCT facilities (FAA, n.d. (a)). The National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] § 4321 et seq.) requires that a federal agency prepare a statement of environmental impacts as part of the development process for projects requiring a federal action, such as funding, approving, or permitting.

The FAA prepared a Final Programmatic Environmental Assessment (PEA) for this ATCT Replacement Program (hereinafter referred to as ATCT Final PEA[1]) (FAA ATCT Final PEA, 2023) in accordance with NEPA (42 U.S.C. § 4321 et seq.); FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; the Fiscal Responsibility Act of 2023 (Public Law 118-5); and other applicable federal laws and regulations. The ATCT Final PEA provided sufficient evidence and analysis for a Finding of No Significant Impact (FONSI)/Record of Decision (ROD) determination (FAA ATCT Final PEA, 2023).

This ATCT EA for LAW tiers[2] from the ATCT Final PEA to evaluate the existing environment and analyze the anticipated environmental consequences of the proposed alternatives at a site-specific level through the framework established by the ATCT Final PEA and FONSI/ROD (FAA ATCT Final PEA, 2023).

1.2 PROPOSED ACTION

The FAA's Proposed Action is to replace the existing FAA-owned ATCT with a modern ATCT facility at LAW. Figure 1-1 provides an aerial image of the airport property. The Proposed Action is anticipated to include the following activities:

- Acquisition of a new lease with the airport sponsor to construct an ATCT in a new location.
- Unconditional approval of portions of the Airport Layout Plan (ALP) that depict those portions of the Proposed Project subject to FAA review and approval pursuant to 49 USC §47107(a)(16).

[1] The ATCT Final PEA can be found here:
https://www.faa.gov/air-traffic/bilatctfinalpea21sept2023signed

[2] Tiering in accordance with NEPA is defined in FAA Order 1050.1F, Section 3-2

- Construction and operation of a replacement ATCT and other associated facility support features such as a parking area and security fences.
- Extension and/or relocation 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 the existing ATCT facility and associated infrastructure.
- Modification and/or relocation of existing National Airspace System (NAS) facilities or airport structures necessary to enable project implementation.

The estimated construction start date to replace the ATCT is late 2025/early 2026.

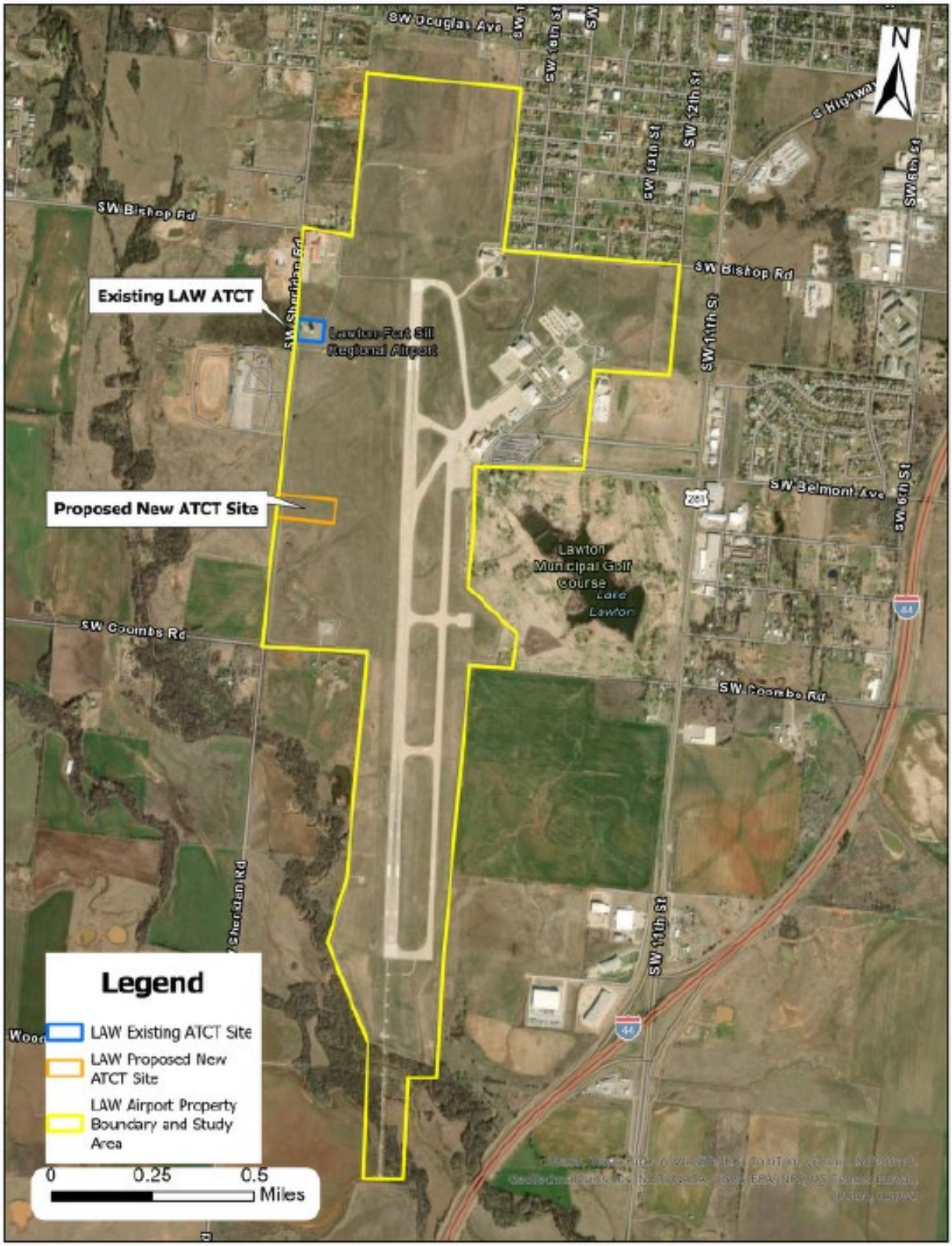


Figure 1-1. Aerial Image of LAW Airport Property

1.3 BACKGROUND

1.3.1 Airport Information

The Lawton-Fort Sill Regional Airport (ID: LAW) is located in southwestern Oklahoma, approximately 92 miles southwest of Oklahoma City and two miles south of the center of Lawton. The airport has served the southwestern Oklahoma region since 1950. Since that time, the airport facility has gone through many operational and physical changes including a reduction in commercial service air carriers and increased security requirements. A series of building additions occurred between 1972 through 1995 to support growth. At this time, LAW has one runway to operate commercial and military traffic with American Eagle and occasional charter flights with Allegiant Air. The airport primarily supports military traffic from Fort Sill and Sheppard Air Force Base, which is located 6 miles to the north (Corgan Associates, 2014). The airport covers 1,300 acres at an elevation of 1,110 feet (FAA, 2024b).

1.3.2 Existing Airport Traffic Control Tower Information

Commissioned in 1965, the existing FAA-owned facility is a Type "O" design (see Figure 1-2) Airport Traffic Control Tower (ATCT). The ATCT operates daily from 8:00 AM to 7:00 PM and is located within a secure fenced area of the airport property. The ATCT has a cab size of 350 square feet with the cab floor at 49 ft above ground level (AGL) (FAA, 2024c). The existing ATCT is located in the northwest portion of the airport property and abuts the western edge of the property boundary at 34° 34' 35.01" N, 98° 25' 16.72" W (see Figure 1-1).

Figure 1-2. Photo of Existing Type "O" ATCT at LAW

SECTION 2 | PURPOSE AND NEED

This Purpose and Need is tiered from, and consistent with, the ATCT Final PEA (FAA ATCT Final PEA, 2023) but focuses on the specific requirements of the LAW ATCT.

2.1 PURPOSE

The LAW ATCT is an FAA-owned ATCT proposed for replacement under the ATCT Replacement Program. The purpose of the Proposed Action is to replace the LAW ATCT with a modern ATCT providing for uninterrupted air traffic control services.

The Proposed Action at this airport would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements. This replacement ATCT would enable the installation of modern and required air traffic control equipment, improve visibility of the airport property, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design including energy efficient features, windows, and ventilation/heating systems while meeting applicable FAA requirements.

2.2 NEED

The FAA recognizes the need to provide continual air traffic control services at LAW. The LAW ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, does not meet personnel space requirements, lacks modern amenities, and may have physical problems, such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation, plumbing). The existing ATCT is operating beyond its design life, resulting in increased maintenance issues. Improvements made to rectify this situation would ensure uninterrupted air traffic control services to maintain the safety of the NAS.

SECTION 3 | ALTERNATIVES

In compliance with FAA Order 6480.4C, *Siting Airport Traffic Control Towers,* the FAA adheres to a siting process to determine the single-most technically feasible site for the establishment or replacement of an ATCT facility (FAA, 2024a).[3] This siting process takes into consideration multiple technical criteria, as prescribed in FAA Order 6480.4C.

Representatives from the FAA and LAW airport conducted siting for this project in conjunction with FAA's Virtual Immersive Siting Tower Assessment (VISTA) process. The FAA and LAW airport representatives met virtually to participate in siting activities to determine viable and preferred ATCT sites for a potential new ATCT at LAW (FAA, 2023).

This tiered EA evaluates the selected site alternative and no build alternative for the proposed replacement of the LAW ATCT. Other alternatives which were considered in the siting report were not carried forward as they did not meet the technical siting criteria as outlined in FAA Order 6480.4C (FAA, 2024a). Figure 3-1 displays a final layout plan of the proposed replacement tower at the selected site alternative.

3.1 ALTERNATIVE 1: PROPOSED ACTION (PREFERRED ALTERNATIVE)

The Proposed Action, as determined by the siting process governed by Order 6480.4C, is construction and operation of a replacement ATCT at a site referred to in the siting report as Site 5. Site 5, hereinafter referred to as the proposed new ATCT site, is located at 34° 34' 14.20" N, 98°, 25' 12.46" W, approximately 2,100 feet south of the existing ATCT. This location was deemed most technically feasible of the siting alternatives considered based on the siting criteria referenced in Chapter 3 of the ATCT Final PEA (FAA ATCT Final PEA, 2023).

The proposed new ATCT site, which is located approximately 1,000 feet west of Runway 17/35 (the single runway), is an approximately 2.6-acre site providing the most optimal visibility of the considered alternatives for air traffic control. The proposed new ATCT site is an open, regularly mowed, grassy field. The proposed tower cab floor elevation is 80.83 feet AGL and 1,180.83 feet above mean sea level (AMSL). At this height, controllers would have unobstructed views of all airport controlled areas and all nearby airborne traffic. The new tower would have an 8-sided, 450 square foot cab facing east. The proposed design includes adequate space for movement of four authorized controller positions. Stairs would be located opposite the Ground Control position. This proposed design would allow for a safe operating environment for aeronautical activity at LAW well into the future and would be built to resist seismic events and includes upgrades for resistance against seismic events that have potential to occur in the area (USGS, 2022).

Existing utilties (water, power, gas, telephone) are not located at the proposed new ATCT site. New utilities would be extended along SW Sheridan Road, to the west of the Proposed new ATCT site, and alongside the proposed access road between the proposed new ATCT site and SW Sheridan Road, as shown on Figure 1-1. Existing local roads would be used for

[3] The FAA adopted/accepted for internal use the new FAA Order 6480.4C and is currently in the process of obtaining official signature.

construction and maintenance traffic. The proposed new ATCT would require a rotating beacon which would shine light into the cab and may need to be shielded.

The Proposed Action also includes demolition of the existing LAW ATCT. Upon demolition of the existing ATCT, the site would be restored to match similar conditions of the surrounding area. Utilities that tie into the existing ATCT would be disconnected or abandoned. Best practices for erosion and sedimentation would be implemented during the demolition process to avoid impacts to surrounding natural resources.

Figure 3-1. Layout of the Proposed New LAW ATCT

3.2 ALTERNATIVE 2: NO ACTION

A No Action Alternative is required to be included in this EA consistent with FAA Order 1050.1F. The No Action Alternative is defined as maintaining the status quo (baseline conditions) without construction of a new ATCT. The No Action Alternative is used to evaluate the effects of not replacing the ATCT and provides a benchmark against which other alternatives may be evaluated. Therefore, for purposes of comparative analysis in this EA, the No Action Alternative represents the conditions that would be anticipated if Alternative 1 (Proposed Action) were not implemented.

SECTION 4 | AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This Section provides the documentation of existing environmental resource conditions or affected environment at LAW and surrounding areas. This section also analyzes the anticipated environmental consequences from each alternative for each resource category.

As detailed in the ATCT Final PEA and FONSI/ROD (FAA ATCT Final PEA, 2023), 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, site selection, and construction process for those ATCT projects within the scope of the ATCT Final PEA analysis.

4.1 RESOURCE CATEGORIES PREVIOUSLY REVIEWED BY ATCT FINAL PEA

The ATCT Final PEA and FONSI/ROD identified several resource categories as having "no significant impact" (FAA ATCT Final PEA, 2023). The following resource categories were reviewed for project specific impacts and were determined to be consistent with the ATCT Final PEA in that no significant impacts are anticipated.

☒ Air Quality

☒ Climate

☒ Farmlands

☒ Hazardous Materials, Solid Waste, and Pollution Prevention

☒ Land Use

☒ Natural Resources and Energy Supply

☒ Noise

☒ Socioeconomics, Environmental Justice,[4] and Children's Environmental Health and Safety Risks

[4] On January 21, 2025, President Trump issued Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity.* 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.

4.2 RESOURCE CATEGORIES REQUIRING SITE-SPECIFIC ANALYSIS PER THE ATCT FINAL PEA

The ATCT Final PEA also identified resource categories that were unlikely to be significantly impacted but would require a site-specific analysis (FAA ATCT Final PEA, 2023). In accordance with the ATCT Final PEA, this EA reviews the following resource categories:

- Biological Resources – Section 4.2.1 includes a description of the existing environment and potential environmental consequences for biological resources.
- Coastal Resources – There are no coastal resources within proximity to LAW; therefore, this resource area has not been analyzed in this EA.
- DOT Act, Section 4(f) – Section 4.2.2 includes a description of the existing environment and potential environmental consequences for Section 4(f) properties on or near LAW.
- Historical Architectural, Archeological, and Cultural Resources – Section 4.2.3 includes a description of the existing environment and potential environmental consequences for historic and cultural resources.
- Visual Effects – Section 4.2.4 includes a description of the existing environment and potential environmental consequences for visual effects.
- Water Resources – Section 4.2.5 includes a description of the existing environment and potential environmental consequences for water resources.

Regulatory requirements for these resource categories can be reviewed in more detail in the ATCT Final PEA (FAA ATCT Final PEA, 2023).

4.2.1 Biological Resources (Including Fish, Wildlife, and Plants)

Biological resources include native plants, animals, and their habitats. Protected and sensitive biological resources include federally listed (endangered[5] or threatened[6]), and candidate[7] species designated by the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), or a State. Sensitive habitats described in this section include those areas designated by the USFWS as critical habitat[8] protected by the Endangered Species Act of 1973 (ESA; 16 U.S.C. Chapter 35 § 1531 et seq.).

---

5 Endangered species are "any species which is in danger of extinction throughout all or a significant portion of its range" (ESA, Section 3(6))

6 Threatened species are "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range" (ESA, Section 3(20))

7 Candidate species are any species whose status is under review "to determine whether it warrants listing under the ESA" (ESA, Section 4)

8 Critical habitat refers to "(i) the specific areas within the geographical area occupied by the species, at the time it is listed in accordance with the provisions of section 4 of this Act, on which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection; and (ii) specific areas outside the geographical area occupied by the species at the time it is listed in accordance with the provisions of section 4 of this Act, upon a

4.2.1.1 Affected Environment

Vegetation

The LAW airport is within the U.S. Environmental Protection Agency's Level III Ecoregion 27 (Central Great Plains) of Oklahoma (EPA, 2004). The airport is located in a fairly undeveloped area south/southwest of the center of Lawton. The airport is surrounded by a park, a racetrack, a golf course, and a lake to the east. The existing ATCT site is located 1,212 feet west of the single runway and 2,100 feet north of the proposed new ATCT site. The existing ATCT site is located at the end of a short access road and is surrounded by open mowed grass. There are five hardwood trees along this access road and mowed Bermuda grass (*Cynodon dactylon*) surrounding the paved area of the tower. The proposed ATCT is located on a vegetated, but mowed, unimproved area of the airfield. The proposed new ATCT site is regularly mowed to maintain a plant height of 6-12-inches tall. Vegetation around the proposed new ATCT site consists primarily of drooping brome (*Bromus tectorum*), jointed goatgrass (*Aegilops cylindrica*), and ragweed (*Bassia scoparia*). Some cacti – desert prickly pear (*Opuntia phaeacantha)* – was also observed in some areas of the site, particularly in the hilly area to the south of the proposed new ATCT site. A few Carline thistle (*Carlina*) were also observed. No structures or existing utilities are present within this vegetated area.

Wildlife and Fish

Due to the proposed ATCT site being located on airport property, surrounded by airport facilities, and on a previously disturbed area (mowed grass), high quality habitat for wildlife species is not present. There are no aquatic resources within the vicinity of the existing or proposed ATCT sites that would serve as habitat for aquatic wildlife and or fish. The nearest aquatic resource is Lake Lawton, which is located approximately 0.5-miles to the east of the existing and proposed ATCT sites, and on the opposite side of the runway. The runway fragments this aquatic habitat from the proposed and existing ATCT sites.

The only fauna observed during the August 2024 site visit were grasshoppers (*Caelifera)*. Highly mobile species such as birds, bats, or flying insects could be transiently present, but it is unlikely most wildlife would use the proposed new ATCT site and existing ATCT as permanent habitat. Common birds, such as the brown-headed cowbird (*Molothrus ater*), yellow warbler (*Setophaga petechia*), zone-tailed hawk (*Buteo albonotatus*), and western kingbird (*Tyrannus verticalis*), could use nearby trees or existing structures for nesting or rearing of young (e-Bird, 2024).

LAW is obligated to comply with the wildlife hazard management requirements, standards, and recommendations made by the FAA in Advisory Circulars. The airport has developed a Wildlife Hazard Management Plan (WHMP) to maintain a safe operating environment. In addition, a wildlife hazard group has been developed to provide review and input of the WHMP and ensure the plan is implemented. The WHMP indicated that common wildlife encountered at LAW includes several avian guilds, striped skunks (*Mephitis mephitis*), domestic cats (*Felis catus*), northern raccoons (*Procyon lotor*), domestic dogs (*Canis lupus*

determination by the Secretary that such areas are essential for the conservation of the species." (ESA, Section 3(5)(A))

familiaris), coyotes (*Canis latrans*), red fox (*Vulpes vulpes*), Virginia opossums (*Didelphis virginiana*), rabbits (*Oryctolagus cuniculus*), white-tailed deer (*Odocoileus virginianus*), and small rodents, such as mice (*Mus musculus*) and rats (*Rattus*). Bird activity is most prevalent around Lawton Municipal Golf Course (to the east/southeast of the existing and proposed new ATCT sites) and Lake Lawton (to the east of the existing and proposed new ATCT sites). (Lawton-Fort Sill Regional Airport, 2024)

Special Status Species

Special status species generally occupy unique or specific habitat, such as riverine forests, wetlands, or native ecosystems. No federal or state-listed endangered, threatened, or candidate species have been documented or observed within the LAW study area. As rats have been observed within the airport property, a further evaluation was conducted to determine the presence of the federal endangered Texas kangaroo rat (*Dipodomys elator*). Habitat for the Texas kangaroo rat is described by USFWS as bare ground and short grasses, often expressed as a lack of dense vegetation with topographic relief not prone to flooding. This species digs a subterranean burrow system within loam/clay-loam/sandy-loam soils which they use for shelter. Although this habitat is consistent with the habitat observed at the proposed new ATCT site, this species does not have the appearance of a common rat and has not been documented in the state of Oklahoma in over 45 years (Oklahoma Department of Wildlife Conservation, 2017). This species was not observed during the August 2024 site visit.

Table 4-1 displays the federally listed species within Comanche County, Oklahoma. According to the Oklahoma Department of Wildlife and Conservation, there are 21 federally listed special status species known to occur in the state (Oklahoma Department of Wildlife and Conservation, 2024). The USFWS Information Planning and Consultation (IPaC) list of federally protected species is provided in Appendix A.

Table 4-1. Federally Listed Species

Common Name	Scientific Name	County Listed Status	Study Area Status
Piping Plover	*Charadrius melodus*	Threatened	Threatened
Rufa Red Knot	*Calidris canutus rufa*	Threatened	Threatened
Whooping Crane	*Grus americana*	Endangered	Endangered
Monarch Butterfly	*Danaus plexippus*	Proposed Threatened	Proposed Threatened
Tricolored Bat	*Perimyotis subflavus*	Proposed Endangered	NA
Plains Spotted Skunk	*Spilogale interrupta*	Resolved Taxon	NA
Black-capped Vireo	*Vireo atricapilla*	Recovery	NA
Texas Kangaroo Rat	*Dipodomys elator*	Proposed endangered	NA
American Peregrine Falcon	*Falco peregrinus anatum*	Recovery	NA

Source: (USFWS, 2024)

Although there is critical habitat for three of the four species listed on the USFWS IPaC species list, none of this critical habitat overlaps the study area for the project. The USFWS maintains a geographic range map for these species: piping plover, rufa red knot, and whooping crane. Although the range maps indicate appropriate habitat in the LAW area,

habitat descriptions for these species do not match that of the LAW existing or proposed new ATCT sites.

Adult monarch butterflies feed on the nectar of flowering plants and their larva requires milkweed plants to develop. Monarch butterflies only reproduce where milkweed plants are located (USDA, 2024). The species could use airport habitat for resting or feeding if flowering plants were present. No milkweed plants were identified during the site visit conducted in August 2024.

Roosting habitat and hibernacula (places for bats to hibernate) is not present at the proposed new ATCT site for the 'proposed endangered' tricolored bat (*Perimyotis subflavus*) as there are no nearby trees. Bats could potentially use the existing tower or the five trees along the access road to the existing tower as roosting habitat; however, no evidence of bats was observed during the site visit in August 2024. The open, mowed space around both the existing and proposed new ATCT site is not ideal foraging habitat for bats.

Migratory Birds

Oklahoma is located mainly within the Central Flyway for migratory birds. The USFWS lists four migratory birds as potentially using or passing through the study area. These species include black-capped vireo (*Vireo atricapilla*), chimney swift (*Chaetura pelagica*), pectoral sandpiper (*Calidris melanotos*), and willet (*Tringa semipalmata*). At LAW, the probability of presence for the black-capped vireo, chimney swift, and willet is highest during the summer months during breeding season. The pectoral sandpiper is only documented to have potential for presence in the study area during late April (USFWS, 2024).

The bald eagle is not a Bird of Conservation Concern in the study area; however, it warrants additional attention due to its inclusion in the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). According to LAW airport staff, eagles have been observed at the airport property; however, no nests were observed during the August 2024 site visit. Bald eagles could be migrating, breeding, or hunting within the study area. Bald eagle management guidelines would apply if any nests are observed in the future within the study area (USFWS, 2021).

Invasive Species

Invasive terrestrial species were observed surrounding the proposed new ATCT site during the August 2024 site visit. There are 48 invasive plant species listed within cropland/pasture habitats in southeastern Oklahoma. As mentioned above, vegetation around the proposed new ATCT site consists primarily of drooping brome (*Bromus tectorum*), jointed goatgrass (*Aegilops cylindrica*), and ragweed (*Bassia scoparia*). Two of these species, drooping brome and jointed goatgrass, are designated as invasive species in the southeastern region of Oklahoma (OkIPC, 2024a). These species are generally present in the cropland/pasture habitats of the region. Drooping brome, also known as cheatgrass, and is identified as one of the most problematic, dirty dozen, invasive species of Oklahoma.

In addition, the five trees located along the access road to the existing ATCT have been identified as invasive species. The common/white mulberry tree (*Morus alba*) on the north side of the access road is listed as an invasive species, as are the four pear trees (*Pyrus sp.)* on the south side of the access road. Noxious and invasive plant species can be spread by

vehicles, machinery, wildlife, and by natural forces such as by wind or water. Areas that are disturbed through construction, by vehicles, or fire may be vulnerable to the introduction and spread of noxious weeds.

4.2.1.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations and/or factors to consider when evaluating context and intensity for biological resource impacts can be found in the ATCT Final PEA and FAA Order 1050.1 Desk Reference, Section 2.3.1 (FAA, 2020).

Alternative 1: Proposed Action

The Proposed Action would involve construction on a previously cleared portion of the LAW property and demolition of the existing ATCT. The proposed new ATCT site consists of a regularly mowed lot with grasses and forbs.

Due to the proposed ATCT site being located on airport property, surrounded by airport facilities, and on a previously disturbed area (mowed grass), high quality habitat for wildlife species is not present. There are no aquatic resources within the vicinity of the existing or proposed ATCT sites that would serve as habitat for aquatic wildlife and or fish. Although there is critical habitat for three of the four species listed on the USFWS IPaC species list, none of this critical habitat overlaps the study area for the project.

No federal or state-listed endangered, threatened, or candidate species have been documented or observed within the LAW study area. As rats have been observed within the airport property, habitat for the Texas kangaroo rat was further analyzed for potential presence within the study area of the Proposed Action. According to the Oklahoma Department of Wildlife Conservation, this species has not been documented in the state of Oklahoma in 45 years (Oklahoma Department of Wildlife Conservation, 2017). Although airport staff mentioned observing rats on airport property in the past, the Texas kangaroo rat does not have the appearance of the common rat and is not what has been observed. Therefore, no impacts to the Texas kangaroo rat are anticipated from the Proposed Action.

According to LAW airport staff, eagles have been observed at the airport property. Bald eagles could be migrating, breeding, or hunting within the study area. Bald eagle management guidelines would apply if any nests are observed in the study area (USFWS, 2021). The airport maintains a Wildlife Management Plan for protocols if a bald eagle is spotted within the airfield. Prior to taking, possessing, or transporting any bald or golden eagle or nest, a permit must be obtained from the USFWS. The Proposed Action of demolition of the existing ATCT and construction of the new ATCT is not anticipated to alter impacts to any avian species, including the bald eagle. Wildlife Management protocols would remain consistent during the transition to the new ATCT and would be upheld following the commissioning of the new ATCT.

As mentioned above, ground vegetation around the proposed new ATCT site includes two invasive species: drooping brome (*Bromus tectorum*) and jointed goatgrass (*Aegilops cylindrica*). In addition, the five trees located along the access road to the existing ATCT are invasive species: one common/white mulberry tree (*Morus alba*) and four pear trees (*Pyrus*). At this time, design has not established whether the trees would be removed, however if they

are removed as part of the proposed demolition of the existing ATCT, the action would support invasive species removal benefitting the state of Oklahoma.

The proposed new ATCT site is located approximately 2,100 feet south of the existing ATCT. Although the proposed new tower would require additional lighting, the new exterior lighting is unlikely to result in any new effects on wildlife species given its proximity to the existing ATCT. The increased lighting at the proposed new ATCT site is not anticipated to increase the overall effect of lighting on wildlife at the existing airport. The increase of human foot traffic, vehicle traffic, and heavy equipment usage during construction and demolition could introduce noxious weeds and invasive plant species to the construction and demolition sites; however, these impacts are not anticipated. The proposed ATCT would be landscaped with species native to the Comanche County area.

The Proposed Action would also involve the demolition of the existing tower. The area of the existing tower would be converted to land similar to the surrounding area. The demolition of the existing tower would not cause impacts to biological resources but may improve biological conditions in the area if the invasive species are removed.

Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing biological resources would occur.

4.2.1.3 Best Management Practices

Best Management Practices (BMPs) that prevent or reduce habitat loss, disturbance of wildlife species, and erosion and runoff to habitat and water bodies would help preclude impacts to biological resources. Adherence to state guidelines to reduce threats to local fauna could offset potential impacts from introducing or spreading noxious weeds. In order to maintain native species to the Lawton area throughout the process of constructing the proposed new ATCT and demolishing the existing ATCT, landscaping activities would be conducted only with species native to the Lawton area.

4.2.2 Historical, Architectural, Archeological, and Cultural Resources

Historic and cultural resources are sites, structures, buildings, districts, or objects, associated with important historic events or people, demonstrating design or construction associated with a historically significant movement, or with the potential to yield historic or prehistoric data, that are considered important to a culture, a subculture, or a community for scientific, traditional, religious, or other reasons (NPS, 1997). Historic and cultural resources may be subdivided into the following categories: Archaeological resources, Architectural resources, Native resources, and Traditional cultural properties (TCPs).

4.2.2.1 Affected Environment

In accordance with applicable federal laws and regulations, the FAA evaluated the proposed alternatives and APE for historic and cultural resources. The APE is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” (36 Code of Federal

Regulations [CFR] § 800.16(d)). The FAA assessed previously identified cultural resources within the APE and the potential for unidentified resources for each alternative.

Actions that have the potential to affect historic and cultural resources typically involve construction, ground disturbance, or modification of a historic property or a property in the viewshed of a historic property or district. Other effects to consider include noise, vibration, lighting, and increased traffic. Based on the potential for direct and indirect effects, the APE for the proposed undertaking consists of a 0.5-mile radius around the existing ATCT and proposed new ATCT site. The APE is defined as the area shown on Figure 4-1.

The existing ATCT on the property, constructed and commissioned in 1965, is a Type "O" tower type (Figure 1-2). The Type "O" standard ATCT design consists of an occupied pentagonal steel framed shaft with inwardly sloping walls along its height supporting a pentagonal prefabricated, aluminum framed cab. In November 1962, the FAA accepted the Type "O" standard design concept prepared by I.M Pei & Associates. Previously, towers were airport sponsored and designed. The LAW ATCT was the first Type "O" tower commissioned in February 1965. The FAA commissioned the last Type "O" tower in 1968 (FAA, 2021).

SWCA Environmental Consultants (SWCA) prepared a report (see Appendix B) that evaluated the eligibility of the existing ATCT and 48 other historic-age resources on LAW airport property for the National Register of Historic Places (NRHP). This report recommended: (1) the existing ATCT as individually eligible for the NRHP under Criteria A and C; (2) the affirmation of the ca. 1930 Sheridan Road Bridge over Wolf Creek as not eligible for the NRHP under Criteria A, B, C or D; and (3) the remaining surveyed historic-age resources within the APE as not eligible for the NRHP under Criteria A, B, C, or D. Due to previous ground disturbance within the project area (area of disturbance), no archaeological work was recommended. (SWCA, 2025)

No historic properties are shown within the study area on the National Park Service's NRHP Database or the Oklahoma Historical Society's public-facing side of the Oklahoma Landmarks Inventory (Oklahoma Historical Society, 2025). According to the public-facing side of the Oklahoma SHPO's Interactive National Register Sites Viewer, the three nearest sites are outside the study area more than two miles from the proposed new ATCT site. These sites include the NRHP eligible Lawton Municipal Pool (2.15 miles to the northeast of the proposed new ATCT site), the NRHP eligible Lincoln Elementary School (2.31 miles to the northeast of the proposed new ATCT site), and the NRHP listed Mattie Beal House (2.37 miles to the northeast of the proposed new ATCT site). (Oklahoma SHPO, 2025) (NPS, 2025)

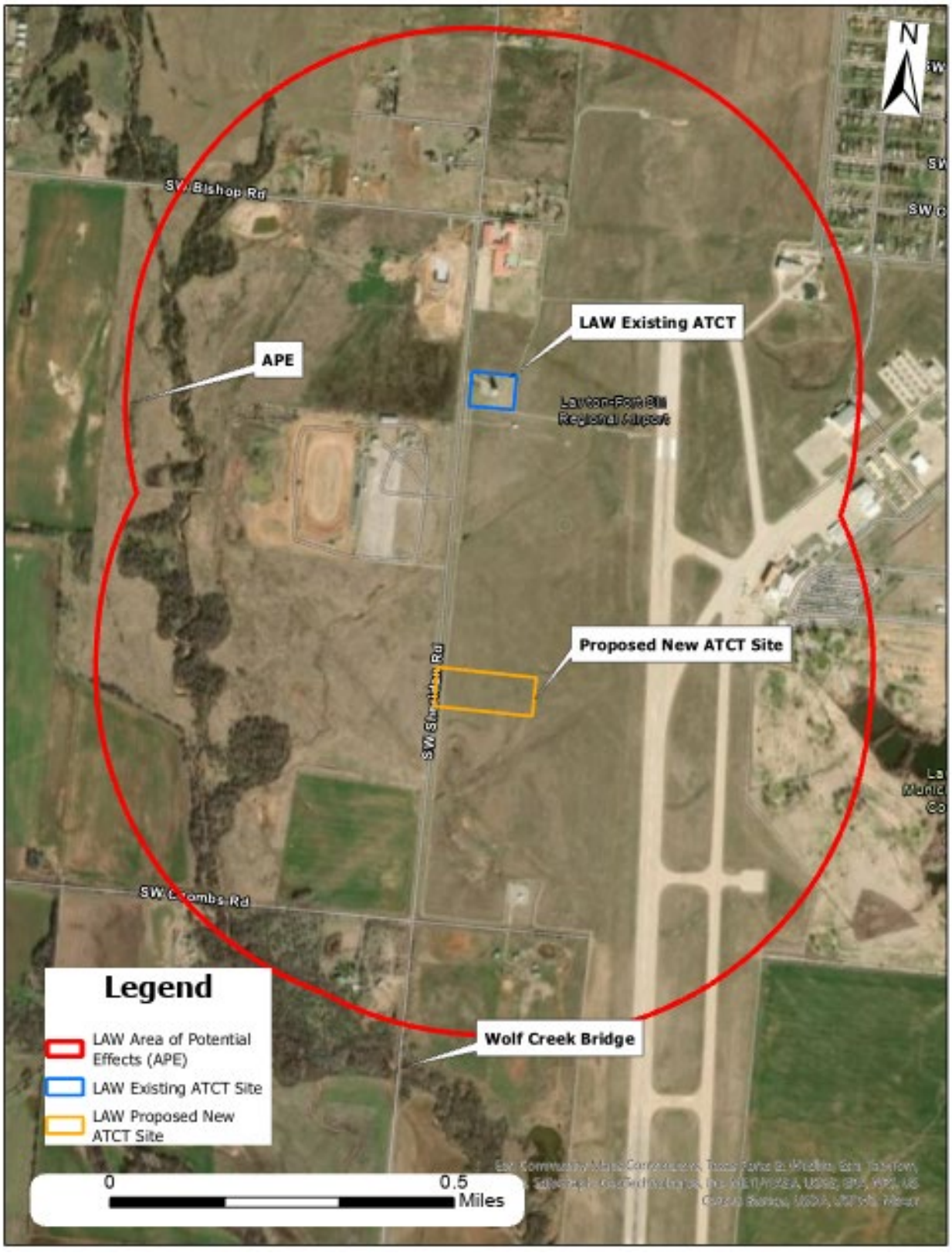


Figure 4-1. Aerial Image of Area of Potential Effects (APE)

4.2.2.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for historical, architectural, archaeological, and cultural resource impacts can be found in the ATCT Final PEA and FAA Order 1050.1 Desk Reference, Section 8.3.1 (FAA, 2020).

Alternative 1: Proposed Action

As discussed in Section 4.2.2.1, SWCA prepared a report (see Appendix B) that recommended: (1) the existing ATCT as individually eligible for the NRHP under Criteria A and C; (2) the affirmation of the ca. 1930 Sheridan Road Bridge over Wolf Creek as not eligible for the NRHP under Criteria A, B, C or D; and (3) the remaining surveyed historic-age resources within the APE as not eligible for the NRHP under Criteria A, B, C, or D.

The demolition of the existing historic ATCT, NRHP eligible under Criteria A and C, would constitute an adverse effect. Per 36 CFR 800.5(a)(2)(i), "Physical destruction of or damage to all or part of the (historic) property" constitutes an adverse effect under Section 106 of the National Historic Preservation Act (NHPA).

Construction of the proposed new ATCT and demolition of the existing ATCT would occur within previously disturbed areas of the developed airport. Past ground disturbance indicates there is little to no potential for archaeological resources within the project area.

The ca. 1930 Wolf Creek Bridge (NBI #19008, ODOT #16N2560E1690002) is a Camelback through truss bridge carrying SW Sheridan Road over Wolf Creek (SWCA, 2025). Research undertaken by SWCA was unable to identify the engineer or construction company of the bridge. The survey team did not identify any plaques on the structure at the time of survey and the bridge had damage along its east elevation near its northeast corner but continues to carry traffic on SW Sheridan Road. Oklahoma Department of Transportation (ODOT) and Oklahoma Historical Society (OHS) have determined this bridge as not eligible for the NRHP under Criteria A, B, C, or D (OHS, 2025). SWCA affirmed the not eligible determination of this structure.

Concurrently with the Draft EA public notice, the FAA initiated the Section 106 consultation under the NHPA with the Oklahoma SHPO and Oklahoma Archaeological Survey (OAS) through notification of the FAA's Finding of Adverse Effect on May 27, 2025. This Section 106 consultation aims to develop and evaluate strategies to avoid, minimize, or mitigate adverse effects to this historic property with identified consulting parties. The FAA also initiated Section 106 consultation with federally recognized Tribes with known interests or affiliations within the project area and notified them of the FAA's finding on May 27, 2025. The following tribes were consulted: the Apache Tribe of Oklahoma, Caddo Nation of Oklahoma, Cheyenne and Arapaho Tribes, Oklahoma, Comanche Nation, Oklahoma, Delaware Tribe of Indians, Kiowa Indian Tribe of Oklahoma, Osage Nation, Quapaw Nation and Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma.

Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing historical, architectural, archaeological, and cultural resources would occur.

4.2.2.3 Mitigation

For the Proposed Action, the FAA is coordinating with the Oklahoma SHPO and other consulting parties to resolve adverse effects on the existing ATCT by developing and considering alternatives or modifications to avoid, minimize, or mitigate those effects before proceeding with the proposed undertaking. Mitigation would include plans for a qualified contractor to complete a Historic American Building Survey (HABS) in accordance with NPS guidelines (NPS, 2023). The requirement to conduct the HABS would be contained within a Memorandum of Agreement (MOA) with the SHPO and other interested consulting parties. Details on this MOA would be included in the Final EA.

4.2.2.4 Unanticipated Discovery

If unanticipated discovery of cultural resources occurs during project implementation, activities would immediately stop in the area of the resource (FAA, 2020). The uncovered resources would be protected. In compliance with all applicable laws and regulations, the FAA would consult with the SHPO and tribes on the discovery. The FAA would consider their recommendations, conduct appropriate actions, then provide a report of those actions after they are completed (36 CFR 800.13).

4.2.3 Department of Transportation Act, Section 4(f)

Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1966 (codified in 49 U.S.C. § 303 and 23 U.S.C. § 138) applies to projects that receive funding from or require approval by agencies within the DOT and provides for the consideration of certain properties of national, state, and/or local significance during transportation project development, such as: public owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites.

Before approving a transportation project requiring the use of these properties, the DOT agency must determine that there is no feasible and prudent alternative to using that land and the project includes all possible planning to minimize harm resulting from the use (FAA, 2020).

4.2.3.1 Affected Environment

In general, actions that have the potential to affect Section 4(f) properties involve a physical or constructive use. Further detail on what constitutes a physical or constructive occupation of the property may be reviewed in the ATCT Final PEA.

According to the Bureau of Land Management (BLM) National Data Viewer, there are no listed recreational sites or wildlife refuges listed within the study area (Bureau of Land Management, 2024). Airport personnel indicated that the public Lawton Municipal Golf Course and driving range is leased from the Lawton Metropolitan Area Airport Authority (Figure 4-1). The golf course is located approximately 0.4 miles east of the proposed new

ATCT site and 0.6 miles east of the existing ATCT site. As this golf course is under public use, it is categorized as a Section 4(f) resource.

Airport personnel indicated that the Bishop Public School, located approximately 0.2 miles north of the existing ATCT, is also leased from the Lawton Metropolitan Area Airport Authority by the Bishop School System. The school includes a playground and track for the students; however, these features may also provide substantial walk-on recreational opportunities for the surrounding community that may qualify this as a Section 4(f) property. As the school appears to host track meets and community members may use the track for recreation, the school's recreational area is subject to Section 4(f) requirements.

In addition to these sites, Lawton Speedway is located 0.2 miles to the southwest of the existing ATCT. This is considered a recreational site; however, as it is not publicly owned, it would not be considered a Section 4(f) resource.

As described in Section 4.2.2, the existing LAW ATCT is eligible for listing on the NRHP per the integrity aspects and criteria found in 36 CFR § 60.4 under Criteria A and C for its association with early national FAA guidelines in the 1960's for construction and implementation of a NAS and as a well-preserved example of a modern master architect-designed ATCT. As such, the NRHP-eligible existing ATCT is also considered a Section 4(f) resource (DOT n.d.(a)).

No historic properties are shown within the study area on the National Park Service's NRHP Database or the Oklahoma Historical Society's public-facing side of the Oklahoma Landmarks Inventory (Oklahoma Historical Society, 2025). According to the public-facing side of the Oklahoma SHPO's Interactive National Register Sites Viewer, the three nearest sites are outside the study area more than two miles from the proposed new ATCT site. These sites include the NRHP eligible Lawton Municipal Pool (2.15 miles to the northeast of the proposed new ATCT site), the NRHP eligible Lincoln Elementary School (2.31 miles to the northeast of the proposed new ATCT site), and the NRHP listed Mattie Beal House (2.37 miles to the northeast of the proposed new ATCT site). (Oklahoma SHPO, 2025) (NPS, 2025)

4.2.3.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for DOT Section 4(f) resource impacts can be found in the ATCT Final PEA and FAA Order 1050.1 Desk Reference, Section 5.3.7 (FAA, 2020).

Alternative 1: Proposed Action

The public school and golf course are not located within the study area. The Proposed Action would not alter the recreational services of these resources. The proposed new ATCT would be located closer to the golf course and further away from the public school; however, these visual changes would not present any limitations to public enjoyment at either of the establishments. Noise is not anticipated to change with the relocation of the ATCT. While there may be a temporary increase in construction noise during the demolition of the existing ATCT and construction of the proposed new ATCT, this noise would not alter resource enjoyment at either the public school or golf course.

The Proposed Action would substantially impair the NRHP-eligible existing ATCT, a Section 4(f) resource, through the demolition of the existing ATCT itself. The demolition of the NRHP-

eligible existing ATCT would adversely impact its physical integrity, resulting in a permanent physical use of the Section 4(f) property.

Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing DOT Section 4(f) resources would occur.

4.2.3.3 Mitigation

The FAA is preparing a Section 4(f) evaluation and plans to consult with the Oklahoma SHPO and DOI during the Section 106 consultation to identify measures to avoid or minimize the harm of impacts before proceeding with the project. The FAA plans to coordinate with the Department of Interior (DOI) to review the project and receive concurrence on the resulting Section 4(f) evaluation. The Final EA would include the mitigation measures identified in the Section 4(f) evaluation. The FAA anticipates the mitigation outlined in the MOA (conducting a HABS) would inform the Section 4(f) finding in consultation with the DOI. The Section 4(f) finding would be included in the Final EA.

4.2.4 Visual Effects

Visual effects are considered under two categories, light emissions and visual resources/character. Light emissions from outdoor lighting in parking lots, streets, and within businesses or homes affect the darkness of the night sky, particularly in rural areas where fewer light sources are present. Visual character is the overall description of an area, such as rural, farmland, urban, coastal, or mountainous. (FAA, 2020)

4.2.4.1 Affected Environment

The proposed new ATCT site is located approximately 1,000 feet west of Runway 17/35 (the single runway) and positioned at the southwestern edge of the airport property (see Figure 4-1). This site, located approximately 2,100 feet south of the existing ATCT, is approximately 2.6 acres of open, regularly mowed, grass. As such, the proposed new ATCT site is within the same viewshed of the existing ATCT. The surrounding area is characterized by the airfield and cleared grass space, similar to the existing ATCT.

There are two residences at the southern end of the LAW airport property boundary on SW Coombs Road that are visual resources. It is likely that these residents would have the new ATCT within their viewshed, despite the presence of trees and vegetation that may block the ATCT from immediate view.

The nearest sensitive receptor is the Bishop Public School, 0.2 miles north of the existing ATCT site.

Light Emission

The LAW ATCT operates daily from 8:00 AM to 7:00 PM. The ATCT controls all runway and taxiway lighting when open. When the ATCT is closed, runway and taxiway lighting has a medium intensity approach lighting system with runway alignment indicator lights. There is also a 72-foot pole, 3,100 feet from the runway that is lighted. The Proposed Action would take place at the existing LAW airport which has existing light emissions. Light emission from

airport activities has the potential to impact residential areas and other sensitive land uses. Currently, light emission at LAW does not conflict with neighboring residential resources or sensitive receptors such as the public school.

Wildlife, especially nocturnal species, may be sensitive to nighttime light sources which may disrupt migratory or breeding cycles. As mentioned in Section 4.2.3.2, the light-sensitive tricolored bat was not identified as a species of concern within the project study area. Although there are five trees within the study area, this small group of trees are not likely to present suitable or attractive habitat for bats. As such, it is not likely that this mobile species would utilize habitat surrounding the tower for roosting or nesting.

Visual Resources and Visual Character

Visual resources around the proposed new ATCT site are consistent with those of the existing ATCT at LAW. The area of the LAW airport is characterized as public facilities land use code (Lawton Zoning Map, 2025). The area surrounding the airport is characterized as agricultural. Visual resources surrounding the airport property include grassy plains, Lawton Speedway, the Bishop Public School, and the Lawton Municipal Golf Course. As stated above, the Bishop Public School (and associated recreational area) is located approximately 0.2 miles north of the existing ATCT. The Lawton Speedway is located 0.2 miles west of the proposed new ATCT site. These are the nearest community resources to the project area. Other visual resources within the existing airport environment include active runways and taxiways, a terminal building, maintenance buildings, fuel storage buildings, air cargo facilities, aircraft storage hangars, and FBO buildings. The tallest structure at LAW is the existing ATCT which has a cab floor eye level elevation of 49 ft AGL. The proposed new ATCT would be 80 ft AGL at the cab floor eye level and may be visible from a further distance than the existing tower.

4.2.4.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for visual resource impacts can be found in the ATCT Final PEA and FAA Order 1050.1 Desk Reference, Section 13.3.3 (FAA, 2020).

Alternative 1: Proposed Action

The proposed new ATCT site is located approximately 2,100 feet south of the existing ATCT and is surrounded by airport property. The area surrounding the existing ATCT is already equipped with lighting. The area of the proposed new ATCT site does not include existing lighting. As such, the Proposed Action would impose an increase to light emissions in the immediate area of the proposed new ATCT site. While there may be a temporary increase in light emissions during the construction of the proposed new ATCT and the demolition of the existing ATCT, light emissions are expected to net equal emissions following the decommissioning of the existing ATCT.

The proposed new ATCT height (top of tower) is 80 feet AGL, which is the shortest possible height that meets the siting criteria. The proposed new ATCT site provides the best line of sight (LOS) to movement areas and provides a better view over the existing tower. Therefore, this location was determined to be the best available location for visibility of airport traffic control (FAA, 2024c). The reflective surfaces of the proposed new ATCT and support

building could alter the visual character of the immediate area at the proposed ATCT site due to the structure addition and change to the viewshed.

The visual resources in the area include the Lawton Speedway, the Bishop Public School, and the Lawton Municipal Golf Course. There are two residential properties at the southern edge of the study area. Airport staff noted that these property owners have not been interested in any airport activities in the past.

These resources, and their respective viewsheds, would not be impacted by the decommissioning and demolition of the existing tower and construction of the new, taller tower. As the viewshed of these resources already includes the existing airport property, the visual character would remain unchanged. The changes in lighting would alter the visual nature of the undeveloped area. However, these changes are anticipated to be minor and are not expected to alter any existing wildlife habitat in the area. The Proposed Action is overall consistent with the visual character of the airport and would not contrast or obstruct the visual character or resources of the area.

Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing visual effects would occur.

4.2.4.3 Best Management Practices

BMPs that could be applied, where appropriate, could reduce impacts to visual resources and light emissions including shielding/baffles to reduce light emissions.

4.2.5 Water Resources

Water resources encompass include wetlands, floodplains, surface water, groundwater, and wild and scenic rivers. These resources provide drinking water, irrigation, and other water uses for communities, in addition to recreation and transportation opportunities, and habitat for vegetation and wildlife species.

4.2.5.1 Affected Environment

Wetlands

The USFWS shows the nearest wetland to the project area as a 0.13-acre freshwater pond type wetland located 0.2 miles south of the existing ATCT site, shown on Figure 4-2 (USFWS, 2025). This wetland is located within the frequently mowed grassy clearing between the existing ATCT and proposed new ATCT site, on the east side of SW Sheridan Road within airport property. This wetland is not anticipated to be of high quality due to its association with stormwater drainage infrastructure and heavy disturbance from airport property maintenance. As SW Sheridan Road transects the wetland feature, the wetland is impaired by habitat fragmentation and altered hydrology.

There are four other small (less than 0.45-acre) wetlands within the study area (Figure 4-2). One of these wetlands is near the project area, 0.14 miles east of the existing ATCT site. All other wetland features are greater than 0.2 miles from the project area.

In addition, there is a riverine, linear wetland feature associated with Wolf Creek to the west of the project area. While this feature is partially within the study area, it is beyond the west side of SW Sheridan Road. It is possible that stormwater drains indirectly from the airport property to Wolf Creek.

Floodplains

According to the Flood Insurance Rate Map (FIRM), the Proposed Action is not in an area of mapped flood risk. There is a flood hazard area (Regulatory Flood Zone) immediately to the west of the project area. This flood zone is associated with Wolf Creek, the nearest stream to the airport and transects the study area (see Figure 4-2) (FEMA, 2024).

Surface Water

There is one man-made lake near the study area, Lake Lawton. The lake is surrounded by Lawton Municipal Golf Course. This lake is not located within the study area. The lake is located 0.85 miles southeast of the proposed new ATCT site (see Figure 4-2).

Groundwater

According to the National Water Dashboard, the study area is not located over a mapped aquifer zone. The nearest aquifer is located approximately 23 miles northeast of the study area. This aquifer is a sandstone aquifer and generally flows from west to east (USGS, 2024). There are no sole source aquifers within or near the study area (EPA, 2024).

Wild and Scenic Rivers

According to the National Wild and Scenic River System map (National Wild and Scenic Rivers System, 2024), there are no wild and scenic rivers listed within the study area. The nearest Wild and Scenic River to the study area is Cossatot River, located approximately 300 miles east of the study area in Arkansas.

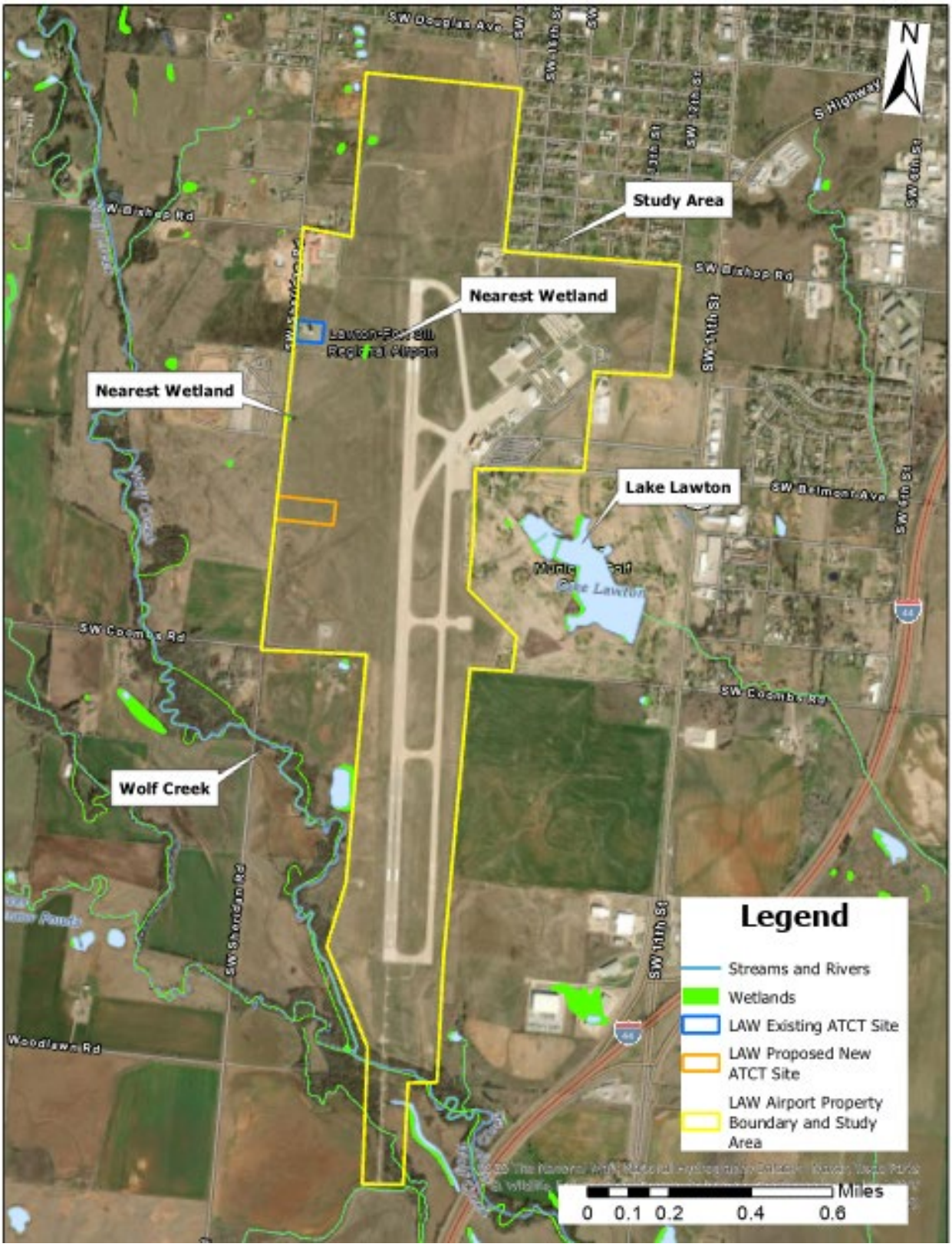


Figure 4-2. Aerial Image of Wetlands and Surface Waters near LAW Airport

4.2.5.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for water resources impacts can be found in the ATCT Final PEA and FAA Order 1050.1 Desk Reference, Sections 14.1.3 through 14.5.3.1 (FAA, 2020).

Alternative 1: Proposed Action

The construction of the proposed new ATCT may have indirect and temporary impacts to a portion of the freshwater pond type wetland to the south of the existing ATCT site, on the east side of SW Sheridan Road. This wetland is located near the general area of disturbance for trenching to install the new utility line for municipal water, which would occur opposite the wetland on the west side of SW Sheridan Road. The trenching and installation of this underground utility line would be routed along the west side of SW Sheridan Road to avoid the wetland located on the east side of SW Sheridan Road. Other utility installation would be routed from the south side of the proposed new ATCT site and therefore would avoid any water resources. BMPs would be implemented to lessen the potential indirect effects to this wetland feature. These practices are discussed in more detail in Section 4.2.5.3.

Construction of the new ATCT may cause temporary, short term, surface disturbing activities to water resources through vehicle traffic and use of machinery for trenching. No direct impacts to wetlands would occur due to the absence of wetlands within the project area. Implementing BMPs that include erosion and sedimentation controls would reduce or prevent potential impacts to downstream waters, such as Wolf Creek.

Disruption of soil surfaces, introduction of non-native plant species through transfer of seeds, and contamination of soils from chemicals such as hydraulic fluids or petroleum leaks could occur during ground disturbing activities. Runoff containing contaminated soil could result in offsite interface with surface waters downstream from the proposed new ATCT site or the proposed trenching area for underground utility installation but is unlikely due to the distance and location of the nearest tributary. Soil, sediment, or chemical runoff could directly or indirectly damage nearby water resource water quality, alter aquatic habitat from sediment build-up, or cause changes to the ecosystems from the introduction of non-native species. The increased presence of heavy construction equipment, fuels, chemicals, or solvents during construction and demolition activities could affect groundwater if spills or leaks were to occur. The severity would depend on the volume or duration of the spill or leak and ability to respond appropriately. Applying BMPs, such as spill/leak monitoring and runoff prevention, could reduce or prevent impacts to groundwater from excavation and construction.

Excavation volume and depth for foundation structural components is unknown at this time. Groundwater could be encountered during excavation and construction activities. If this were to occur and pumping was required to extract water and continue construction, the excess water may be discharged offsite through the LAW stormwater system. According to the LAW Stormwater Pollution Prevention Plan (SWP3), stormwater flows south/southwest of the existing ATCT (Blackshare Environmental Solutions, 2022). Release of these contaminants could result in sediment and chemical runoff where outflow occurs towards Wolf Creek. Disruption of groundwater or groundwater flow could occur at excavation sites and where placement of structural components is located, however these potential impacts

would be temporary in nature. Applying runoff and contamination prevention BMPs could reduce or prevent impacts to groundwater from excavation and construction.

As stated above, LAW airport is anticipated to be in a minimal flooding area and no impacts to floodplains are likely to result from the Proposed Action.

Alternative 2: No Action Alternative

Under the No Action Alternative, the current ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing water resources

4.2.5.3 Best Management Practices

BMPs to offset unavoidable impacts to water resources allow for on-site absorption of rainwater such as permeable surfaces, allowing natural drainage processes, and erosion prevention measures.

Measures for reducing runoff and erosion, as described below, would prevent or reduce sediment and the introduction of non-native plant species from degrading nearby water resources. These measures should be implemented within the study area to avoid the potential for temporary construction impacts to the airport's stormwater catchments and to Wolf Creek.

- Use pervious surfaces where practicable.
- Control runoff, while ensuring the runoff control measures do not attract wildlife hazardous to aviation.
- Control waste and spoils disposal to prevent contaminating ground and surface water, while not attracting wildlife hazardous to aviation (e.g., control the use of pesticides and herbicides, maintain vegetative buffers to reduce sedimentation and delivery of chemical pollutants to the waterbody).
- Limit ground disturbance to the areas necessary for project-related construction.
- Employ erosion control measures to minimize sedimentation of surface waters.
- Restore vegetation on disturbed areas to prevent soil erosion following project completion.

BMPs to reduce direct impacts to groundwater include, but are not limited to, the following:

- Protect water quality of surface water runoff that may infiltrate into the ground.
- Restore vegetation on disturbed areas to prevent soil erosion following project completion.
- Limit the area of new impervious surfaces to the areas necessary for project-related construction.

4.3 CUMULATIVE IMPACTS

FAA Order 1050.1F Paragraph 4.2.d(3) implementing the procedural provisions of NEPA defines cumulative impacts as:

> *"those that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, whether Federal or non-Federal." (FAA, 2015)*

Cumulative impacts can also "be viewed as the total combined impacts on the environment of the proposed action or alternative(s) and other known or reasonably foreseeable actions" (FAA, 2020). On a programmatic level and combined with other actions, the Proposed Action could lead to cumulative impacts depending on the scale (number of projects) or geography (localized area) in which the actions are performed.

Although the ATCT Final PEA (FAA ATCT Final PEA, 2023) indicated that the ATCT Replacement Program would not result in cumulative impacts, this EA included a site-specific analysis to confirm that no cumulative impacts would result locally. This site-specific analysis included an evaluation of past, present, and reasonably foreseeable future projects in the vicinity of the airport and within the study area to identify actions that may amplify the effects of any potential impacts from the Proposed Action.

Within the past five years, there have been several projects completed at the airport. These include pavement rehabilitation projects, rehabilitation of Runway 17/35, lighting system improvements, and the construction of a new terminal building with an emergency generator. The construction of the new terminal building began roughly two years ago and is still underway with an anticipated completion date at the end of June 2025.

Reasonably foreseeable future projects include a taxiway realignment, new hangar construction, an apron expansion, and new hardtop construction on SW Sheridan Road. This new hardtop construction would provide connectivity to the proposed new ATCT access road. Utilities for the proposed new ATCT would tie in off of SW Sheridan Road. The current SW Sheridan Road critical infrastructure protection (CIP) is a gravel area that would be hardened.

The construction of the new terminal building is not likely to overlap with the construction of the proposed new ATCT or demolition of the existing ATCT. During these construction activities, minor erosion and sedimentation may occur. However, implementation of stormwater BMPs would further reduce the potential for any identified limited impacts. With the implementation of such BMPs, the proposed new ATCT would not contribute to a significant adverse cumulative impact to natural resources or energy supply.

The construction of new hardtop on SW Sheridan Road may overlap with the proposed new ATCT project timeline. In this case, there may be increased construction traffic on SW Sheridan Road north of SW Coombs Road. If routed appropriately south of the proposed new ATCT site, traffic could be avoided at the Bishop Public School which is a primary community resource in the area. The impacts due to construction traffic would be temporary and would not have any permanent effects to the community or natural resources.

The cumulative impact of the proposed new ATCT presented in this EA is not anticipated to result in significant impacts or significant cumulative impacts to either human health or the environment.

4.4 CONCLUSION

This site-specific EA evaluates the existing environment at LAW airport and analyzes the potential environmental consequences of the Proposed Action. The cumulative impact of the replacement ATCT presented in this EA is not anticipated to result in significant impacts or significant cumulative impacts to either human health or the environment.

SECTION 5 | PUBLIC INVOLVEMENT

The FAA is providing a 508-compliant electronic copy of this EA for review by the public on the following website: https://www.faa.gov/air_traffic/atf. Comments can be submitted to the FAA (Aaron.Comrov@faa.gov). The FAA published a Notice of Availability advertisement in The Lawton Constitution newspaper to advertise the availability of the Draft EA and allow the public to view the document electronically and how to submit comments.

SECTION 6 | LIST OF PREPARERS

This EA was prepared by:

FAA

Aaron Comrov
FAA Air Traffic Organization
Environmental Team Lead (AJW-2C16E)
CSA Engineering Services Environmental and Occupational Safety & Health Center

Booz Allen Hamilton

Jennifer Salerno – NEPA Program Manager
M.S., Environmental Studies, American University
B.S., Biology, University of Maryland at College Park

Marissa Carvalho – Resource Specialist
M.N.R.S., Ecological Restoration, Colorado State University
B.S., Environmental Science, Northeastern University

Joseph Tomberlin – Resource Specialist
M.H.P., Historic Preservation, Georgia State University
B.A., History, Oglethorpe University

Emily Pelesky – Resource Specialist
M.A., Cultural Heritage Management, Johns Hopkins University
B.A., Anthropology, University of Pittsburgh

SECTION 7 | REFERENCES

Blackshare Environmental Solutions. (2022, August 2). Stormwater Pollution Prevention Plan (SWP3). Lawton, OK.

Booz Allen. (2024). *Site Visit Trip Report - Lawton Fort-Sill Airport.* Booz Allen.

Bureau of Land Management. (2024). *BLM National Data*. Retrieved from https://www.arcgis.com/apps/webappviewer/index.html?id=6f0da4c7931440a8a80bfe20eddd7550%20&extent=-125,%2031.0,%20-114,%2043.0

Corgan Associates, I. (2014). *Design Development Narrative Report.* Lawton: Lawton Ft. Sill Regional Airport.

e-Bird. (2024, August 27). *e-birding this month*. Retrieved from e-Bird: https://ebird.org/region/US-OK-031

EPA. (2024, November 25). *Sole Source Aquifers*. Retrieved from https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b

FAA. (2015, July 16). *FAA Order 1050.1F.* Retrieved from https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050_1F.pdf

FAA. (2020). *FAA Order 1050.1F Desk Reference.* Retrieved from https://qa-www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_nepa_order/desk_ref#:~:text=This%20Desk%20Reference%20provides%20explanatory%20guidance%20for%20environmental,%28FAA%29%20Order%201050.1F%20Environmental%2

FAA. (2021). *Terminal Facilities Design Standard.*

FAA. (2023). *Virtual Immersive Siting Tower Assessment (VISTA) Siting Process Memo.* FAA.

FAA. (2024a). *Order 6480.4C: Siting Airport Traffic Control Tower.* FAA.

FAA. (2024b). *Airport Traffic Control Tower Siting Report.* Lawton: FAA.

FAA. (2024c, July). *Lawton Ft. Sill Regional Airport Fact Sheet*. Retrieved from FAA: https://www.faa.gov/law

FAA ATCT Final PEA. (2023). *Final Programmatic Environmental Assessment and Finding of No Significant Impact/Record of Decision for the Airport Traffice Control Tower Replacement Program.* Washington, DC: FAA. Retrieved from https://www.faa.gov/air_traffic_atf

FAA. (n.d. (a)). *Bipartisan Infrastructure Law - Air Traffic Facilities*. Retrieved from Federal Aviation Administration: www.faa.gov/bil/air-traffic-facilities

FEMA. (2024, November 25). *FEMA's National Flood Hazard Layer (NFHL) Layer*. Retrieved from NFHL Interactive Viewer: https://www.fema.gov/flood-maps/national-flood-hazard-layer

Lawton Zoning Map. (2025, January 12). Retrieved from ArcGIS: https://www.arcgis.com/home/webmap/viewer.html?webmap=3e60ad0a871d489a90276cffd0c30e42

Lawton-Fort Sill Regional Airport. (2024). *LAW Wildlife Hazard Management Plan.* Lawton: Lawton-Fort Sill Regional Airport.

National Wild and Scenic Rivers System. (2024, January). *Find a River*. Retrieved from National Wild and Scenic Rivers System: https://www.rivers.gov/map

NPS. (1997). *How to Apply the National Register Criteria for Evaluation.* Retrieved January 18, 2023, from NPS: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

NPS. (2023, September 20). *Historic American Buildings Survey*. Retrieved from NPS: https://www.nps.gov/subjects/heritagedocumentation/habs.htm

NPS. (2025, March 13). *National Register of Historic Places*. Retrieved from NPS: https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466

NPS. (2025, March 13). *National Register of Historic Places*. Retrieved from NPS: https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466

OHS. (2025, March 13). *NRHP Public View Map*. Retrieved from Oklahoma Historical Society: https://okshpo.maps.arcgis.com/apps/Embed/index.

OkIPC. (2024a, September 25). *Oklahoma Invasive Plant Council*. Retrieved from Invasive Plant Database: https://www.okinvasives.org/plants-database

Oklahoma Department of Wildlife and Conservation. (2024, September 5). *Threatened and Endangered*. Retrieved from Wildlife Department: https://www.wildlifedepartment.com/wildlife/threatened-and-endangered

Oklahoma Department of Wildlife Conservation. (2017, December 14). *Bounding After Texas Kangaroo Rats*. Retrieved from https://www.wildlifedepartment.com/outdoorok/ooj/bounding-after-texas-kangaroo-

rats#:~:text=North%20America%20boasts%2021%20species,last%20documented%20in%20our%20state.

Oklahoma Historical Society. (2025, March 13). *Oklahoma Landmarks Inventory*. Retrieved from Oklahoma Historical Society: https://www.okhistory.org/shpo/oli

Oklahoma SHPO. (2025, March 13). *Oklahoma Interactive National Register Map*. Retrieved from ArcGIS: https://www.arcgis.com/apps/mapviewer/index.html?webmap=abda0e849b874bb29587f7c22f653517

SWCA. (2025). *Lawton Airport Traffic Control Tower Historic Resource Survey.* Lawton: SWCA.

USDA. (2024). *Monarch Butterfly Habitat Needs*. Retrieved October 3, 2023, from United States Department of Agriculture, US Forest Service: https://www.fs.usda.gov/wildflowers/pollinators/Monarch_Butterfly/habitat/

USFWS. (2021, December 3). *Eagle Management*. Retrieved from https://www.fws.gov/program/eagle-management/working-around-eagles

USFWS. (2024). *Information for Planning and Consultation.* Lawton: U.S. Fish and Wildlife Service.

USFWS. (2025, January 12). *National Wetlands Inventory*. Retrieved from Wetlands Mapper: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

USGS. (2022, March 9). *USGS*. Retrieved from Earthquake Hazards - Introduction National Seismic Hazard Maps: https://www.usgs.gov/programs/earthquake-hazards/science/introduction-national-seismic-hazard-maps

USGS. (2024, November 25). *USGS*. Retrieved from National Water Dashboard: https://dashboard.waterdata.usgs.gov/app/nwd/en/?aoi=default

APPENDIX A | FEDERALLY LISTED SPECIES REPORTS FOR COMANCHE COUNTY AND THE STUDY AREA

This appendix contains the list of threatened, endangered, candidate, or species under review by the U.S. Fish and Wildlife Service for Comanche County, Oklahoma. Appendix A also provides site-specific species list, critical habitat, migratory birds, and other information.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, OK 74129-1428
Phone: (918) 581-7458 Fax: (918) 581-7467

In Reply Refer To:
Project Code: 2025-0036566
Project Name: Lawton, OK

12/30/2024 19:49:29 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

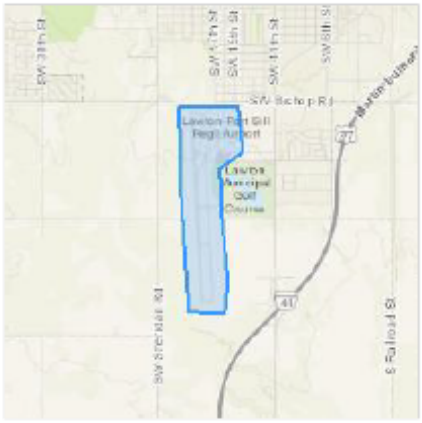
This species list is provided by:

Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, OK 74129-1428
(918) 581-7458

PROJECT SUMMARY

Project Code: 2025-0036566
Project Name: Lawton, OK
Project Type: Airport - New Construction
Project Description: Airport traffic control tower replacement
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@34.56633425,-98.41557435206755,14z



Counties: Comanche County, Oklahoma

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Piping Plover *Charadrius melodus* Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Rufa Red Knot *Calidris canutus rufa* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened
Whooping Crane *Grus americana* Population: Wherever found, except where listed as an experimental population There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/758	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

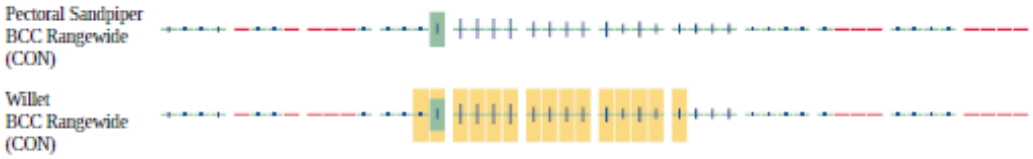
Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Black-capped Vireo *Vireo atricapilla* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5716	Breeds Apr 1 to Sep 15
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER POND

- PUBHx

FRESHWATER EMERGENT WETLAND

- PEM1A

IPAC USER CONTACT INFORMATION

Agency: Federal Aviation Administration
Name: Marissa Carvalho
Address: 1349 W Peachtree Street NW
City: Atlanta
State: GA
Zip: 30305
Email marissacarvalho92@gmail.com
Phone: 4047902092

You have indicated that your project falls under or receives funding through the following special project authorities:

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)

APPENDIX B | NHPA SECTION 106 CONSULTATION

U.S. Department of Transportation
Federal Aviation Administration

United States Department of Transportation
FEDERAL AVIATION ADMINISTRATION
Great Lakes Regional Office
Des Plaines, IL 60018

AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT PROGRAM

May 27, 2025

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act and Finding of Adverse Effect for the Proposed Replacement Airport Traffic Control Tower at the Lawton-Fort Sill Regional Airport, Lawton, Oklahoma

Lynda Ozan
Deputy State Historic Preservation Officer
State Historic Preservation Office
Oklahoma Historical Society
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105

Dear Ms. Ozan:

Introduction

The Federal Aviation Administration (FAA), in accordance with Section 106 of the National Historic Preservation Act of 1966 and implementing regulations (36 Code of Federal Regulations [CFR] Part 800), invites you to participate in consultation for the proposed construction of a new Airport Traffic Control Tower (ATCT) at Lawton-Fort Sill Regional Airport, 3401 SW 11th Street, Lawton, OK 73501. In accordance with 36 CFR 800.3(g), this letter's purpose is to initiate a Section 106 consultation with your office and seek your concurrence with the FAA's findings.

Under the ATCT Replacement Program (Program), the FAA plans to replace existing FAA-owned ATCTs with modern facilities at airports across the nation. The Infrastructure Investment and Jobs Act (Public Law 117-58), formerly referred to as the Bipartisan Infrastructure Law (BIL), provided funding to improve ATCTs nationwide.

This project is a component of the Program and is an undertaking under Section 106 to construct a new ATCT and demolish the existing ATCT at Lawton-Fort Sill Regional Airport. The FAA will be coordinating its review under Section 106 with its compliance under the National Environmental Policy Act (NEPA). The proposed undertaking would occur within Lawton-Fort Sill Regional Airport, Lawton, Oklahoma (see Exhibit 1 – Project Area and Area of Potential Effects).

Description of the Undertaking

The FAA is proposing to build and operate an ATCT at latitude 34° 34' 14.20" N, longitude 98° 25' 12.46" W, located 2,100 feet south of the existing ATCT at 3401 SW 11th Street, Lawton, OK 73501 (see Exhibit 2 – Site Plans). Total acreage of the project area is 4-acres, including the 1.4-acre area of the existing ATCT and the 2.6-acre area of the proposed ATCT. The proposed undertaking would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements.

The existing ATCT is beyond its useful design life and has reached its operational and functional capability. The existing ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, lacks personnel space requirements and modern amenities, and exhibits physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation). The proposed ATCT would enable the installation of modern and required air traffic control equipment, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in in reduced energy consumption due to an efficient design while meeting applicable FAA requirements.

The proposed tower cab floor elevation would be 80.83 ft above ground level and 1,180.83 ft above mean sea level. This is the minimum height that would meet all siting criteria under the Safety Management System. At this height, controllers would have unobstructed views of all airport-controlled areas and all airborne traffic with existing infrastructure. The tower would have an eight-sided, 450 square foot cab. The proposed design includes space for controller movement and combining air traffic controller positions. Stairs would be located opposite the Ground Control position. This proposed design would allow for a safe operating environment and include upgrades for resistance against seismic events.

For new construction, staging, and demolition, site access for the project would occur using existing local roads and parking areas. To provide uninterrupted air traffic control services, the current ATCT would be demolished after construction of the proposed new ATCT is completed.

Area of Potential Effects

The Area of Potential Effects (APE), as defined at 36 CFR 800.16(d), is the geographic area or areas within which the undertaking may directly or indirectly cause alterations in the character or use of any historic properties. Actions that have the potential to affect historic properties include construction and ground disturbance as well as noise, vibration, and visual effects.

Based on the potential for direct and indirect effects, the APE for the proposed undertaking includes a 0.5-mile radius around the location of the proposed ATCT and the existing ATCT. Within the project area, construction, demolition, maintenance, and usage effects may occur (see Exhibit 1). New utilities would be placed from existing utility lines within the APE along SW Sheridan Road and north of SW Coombs Road. The existing airport perimeter, maintenance, and public access roads would be used for construction and maintenance traffic.

The proposed ATCT would be visible from much of the surrounding airport area. The design intention for the proposed ATCT is to create an efficient, low maintenance facility which meets the operational requirements of the airport, harmonizes with the surrounding environment, and is consistent in character with the existing and proposed airport facilities.

Historic Property Identification

The Lawton-Fort Sill Regional Airport was first established in 1950. The existing ATCT on the property is of a "Type O" tower type. The "Type O" standard ATCT design consists of an occupied pentagonal steel framed shaft with inwardly sloping walls along its height supporting a pentagonal prefabricated, aluminum framed cab. In November 1962, the FAA accepted the "Type O" standard design concept prepared by I.M. Pei & Associates. Previously, towers were airport sponsored and designed. Constructed and commissioned in 1965, the Lawton-Fort Sill ATCT was the first "Type O" tower commissioned by the FAA (Figure 1). The first "Type O" tower was commissioned in February 1965 and the last commissioned in 1968.

SWCA Environmental Consultants (SWCA) prepared a report, *Lawton-Fort Sill Airport Traffic Control Tower Historic Resources Survey, Comanche County, Oklahoma,* evaluating the eligibility of the existing ATCT (see Exhibit 3). This report recommended: (1) the existing ATCT as individually eligible for the NRHP under Criteria A and C; (2) the affirmation of the ca. 1930 Sheridan Road Bridge over Wolf Creek as not eligible for the NRHP under Criteria A, B, C, or D; and (3) the remaining surveyed historic-age resources within the APE as not eligible for the NRHP under Criteria A, B, C, or D. Due to previous ground disturbance within the project area, no archaeological work was recommended.

No historic properties are shown within the study area on the National Park Service's NRHP Database or the Oklahoma Historical Society's public-facing side of the Oklahoma Landmarks Inventory (OLI). According to the public-facing side of the Oklahoma State Historic Preservation Office's Interactive National Register Sites Viewer, the three nearest sites are outside the study area more than 2 miles from the proposed new ATCT site. These sites include the NRHP eligible Lawton Municipal Pool (2.15 miles to the northeast of the proposed new ATCT site), the NRHP eligible Lincoln Elementary School (2.31 miles to the northeast of the proposed new ATCT site), and the NRHP listed Mattie Beal House (2.37 miles to the northeast of the proposed new ATCT site.

Assessment of Effects

Construction of the proposed ATCT would occur within the developed airport property. The proposed site is located within the airport operations area at latitude 34° 34' 14.20" N, longitude 98° 25' 12.46". The existing ATCT proposed for demolition is in the project area at 3401 SW 11th Street, Lawton, OK 73501 and is a historic property considered eligible for the NRHP. The demolition of the historic existing ATCT would constitute an adverse effect. The proposed ATCT's construction would have no adverse effect on other historic-age resources remaining at LAW, including the 1930 Wolf Creek Bridge and the other surveyed historic-age resources within the APE.

Construction of the proposed new ATCT and demolition of the existing ATCT would occur within previously disturbed areas of the developed airport. Therefore, it is unlikely that undisturbed cultural resources remain within the project area. If, however, during construction or maintenance activities, any cultural resources are discovered, construction would cease and the appropriate state, federal, and tribal officials would be notified and given the opportunity to review, determine its significance, and implement any necessary mitigation measures.

The FAA proposes a Finding of Adverse Effect due to the existing ATCT's proposed demolition. In accordance with 36 CFR 800.6, the FAA will consult with you and other Section 106 consulting parties to develop and evaluate strategies to avoid, minimize, or mitigate adverse effects to this historic property.

Section 106 Consultation

In accordance with 36 CFR 800.3, the FAA has identified the Lawton-Fort Sill Regional Airport as a Section 106 consulting party. The FAA identified and will separately initiate consultation with the following federally recognized Tribes with known interests in the area: Apache Tribe of Oklahoma, Caddo Nation of Oklahoma, Cheyenne and Arapaho Tribes, Oklahoma, Comanche Nation, Oklahoma, Delaware Tribe of Indians, Kiowa Indian Tribe of Oklahoma, Osage Nation, Quapaw Nation and Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma. Invited parties will have 30 days to respond and provide comments.

The FAA integrated the public involvement for this undertaking with this project's NEPA process. Information regarding the Program is available at Tower Design Initiative website (https://www.faa.gov/tower-design). Information on the Draft Environmental Assessment for the LAW ATCT is available through a dedicated website location at: https://www.faa.gov/air_traffic/atf.

Request for Comment and Concurrence

As outlined above, the purpose of this letter is to seek your concurrence with the FAA's Finding of Adverse Effect and invite your views on the effects.

We request that you review the information and respond within 30 days of receiving this letter. If you should need any further information or wish to discuss the project, please contact Aaron Comrov at 847-294-7665 and aaron.comrov@faa.gov.

Sincerely,

Aaron Comrov

Aaron Comrov
Environmental Team Lead
CSA ES EOSH Center
Federal Aviation Administration

Enclosure

Exhibit 1 – Project Area and Area of Potential Effects

Exhibit 2 – Site Plans

Exhibit 3 – *Lawton-Fort Sill Airport Traffic Control Tower Historic Resources Survey, Comanche County, Oklahoma*