

FEDERAL AVIATION ADMINISTRATION



FINDING OF NO SIGNIFICANT IMPACT/ RECORD OF DECISION

for the Proposed
Airport Traffic Control Tower (ATCT) Replacement
at
St. Louis Regional Airport (ALN), East Alton, Illinois

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT
AND
RECORD OF DECISION
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT
ST. LOUIS REGIONAL AIRPORT (ALN), EAST ALTON, ILLINOIS**

I. INTRODUCTION

This document is the Federal Aviation Administration’s (FAA) Finding of No Significant Impact/Record of Decision (FONSI/ROD) for the proposed Airport Traffic Control Tower (ATCT) Replacement at St. Louis Regional Airport (ALN). This FONSI/ROD is based on the information and analysis contained in the Final Environmental Assessment (EA), dated July 2025. This ALN ATCT Final EA also tiers off of the Final Programmatic EA (ATCT Final PEA) and FONSI/ROD issued in October 2023. This ALN ATCT Final EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [U.S.C.] § 4321 et seq.); FAA Order 1050.1F, Environmental Impacts: Policies and Procedures;¹ and the Fiscal Responsibility Act of 2023 (Public Law 118-5).

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

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

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

¹ FAA Order 1050.1G, FAA National Environmental Policy Act Implementing Procedures, was published on June 30th, 2025. Preparation for this Final EA was completed pursuant to FAA Order 1050.1F and all current Executive Orders and applicable case law.

short-term and temporary impacts from demolition and removal of waste or other unknown materials from the existing (older) ATCT site.

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

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

II. PROPOSED ACTION

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

- Acquisition of new lease with the airport authority to construct 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).
- Construction and operation of a replacement ATCT.
- Extension of 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, including asbestos abatement and removal of other hazardous materials, and proper disposal of the existing ATCT facility and associated infrastructure.
- Relocation and consolidation of the remote transmitter/receiver (RTR) equipment into the replacement ATCT and demolition of the existing RTR facility.
- Relocation of static aircraft display and removal of trees for new display area.

III. PURPOSE AND NEED OF THE PROPOSED ACTION

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

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

The Proposed Action for the ALN ATCT would provide for a modern ATCT providing for uninterrupted air traffic control services that would meet all applicable FAA requirements. The replacement ATCT at ALN 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 reduced energy consumption due to an efficient design including energy efficient features, windows, and ventilation/heating systems. The FAA recognizes the need to provide continual air traffic control services at ALN. The need to provide continual air traffic control services at ALN is due to the existing tower lacking the ability to accommodate upgrades to the latest air traffic control technologies, the personnel space requirements, modern amenities, and physical problems, such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation, plumbing). Improvements made to rectify this situation would ensure uninterrupted air traffic control services to maintain the safety of the NAS.

IV. ALTERNATIVES CONSIDERED

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

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

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

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

V. ENVIRONMENTAL CONSIDERATIONS AND MITIGATION

The FAA identified and evaluated potential environmental impacts in the St. Louis Regional Airport ATCT Replacement Final EA. The Proposed Action will not change flight patterns, altitudes, or aircraft traffic volumes. Noise levels will be unchanged. This Final EA tiers off of the ATCT Final PEA and FONSI/ROD (October 2023) which identified that ATCT replacement is not anticipated to have significant impacts to

air quality; climate; compatible land uses; farmlands; hazardous materials, solid waste, and pollution prevention; noise; socioeconomics and children's environmental health and safety risks; or natural resources and energy supply. A site-specific evaluation validated that significant impacts are not anticipated to these resource categories. In addition, no impacts are anticipated to the other resource categories listed in FAA 1050.1F, *Environmental Impacts: Policies and Procedures*.² The Proposed Action is not anticipated to result in significant environmental impacts.

The Final EA included site-specific analyses for the six resource areas not covered by the findings of the October 2023 ATCT Final PEA and FONSI/ROD: historic and cultural resources, visual effects, coastal resources, biological resources, Section 4(f) resources, and water resources.

In September 2024, the FAA determined a Finding of Adverse Effect for the proposed demolition of the existing ALN ATCT as the tower is eligible for the National Register of Historic Places (NRHP) under Criterion C as it was designed by master architect I.M. Pei and Criterion A for its historical representation of the construction and implementation of the NAS. Under Section 106 of the National Historic Preservation Act (NHPA), in October 2024, the FAA initiated consultation for the proposed undertaking and shared its Finding of Adverse Effect with potential Section 106 consulting parties, including the Illinois State Historic Preservation Office (SHPO), St. Louis Regional Airport Authority, the East Alton History Museum, Kickapoo Tribe of Oklahoma, Menominee Tribe of Wisconsin, Miami Tribe of Oklahoma, Osage Nation, Peoria Tribe of Indians of Oklahoma, Quapaw Nation, and Seneca-Cayuga Nation. The SHPO concurred in a letter with the FAA's findings (Appendix A in the ALN ATCT Final EA). The FAA received a response from the Quapaw Nation stating that the Quapaw Nation Historic Preservation Program believes that the undertaking has no effect on known properties of cultural or sacred significance to the Quapaw Nation. No other parties responded.

In coordination with the Illinois SHPO and other consulting parties, the FAA developed a Memorandum of Agreement (MOA) to resolve the proposed undertaking's adverse effect including agreed upon mitigation to resolve the undertaking's adverse effect under Section 106. In April 2025, the FAA provided its Finding of Adverse Effect and the draft MOA to the Advisory Council on Historic Preservation (ACHP), Landmarks Illinois, the Illinois Department of Transportation (IDOT), and the aforementioned potential consulting parties as part of the FAA's continued consultation efforts to resolve adverse effects to the existing ATCT. The FAA and consulting parties executed the MOA on June 26, 2025, to implement the completion of a Level II Historic Illinois Building Survey as mitigation to resolve the adverse effect on the existing ATCT. On July 2, 2025, the ACHP acknowledged receipt of the executed Section 106 MOA and stated this agreement "fulfills the requirements of Section 106 of the National Historic Preservation Act and its implementing regulations" (Appendix B in the ALN ATCT Final EA).

The demolition of the NRHP-eligible existing ATCT would adversely impact and result in permanent use of the Section 4(f) property. The FAA prepared a Section 4(f) evaluation and consulted with the Department of Interior (DOI) and the Illinois SHPO during the Section 106 consultation to identify measures to avoid or minimize the harm of impacts before proceeding with the project. On May 7, 2025, the FAA received concurrence from DOI on the determination of actions that constitute a use under Section 4(f). The DOI also concurred with "the determinations of actions that constitute a use under

Section 4(f) and that the FAA has included all possible planning to minimize harm to Section 4(f) resources.” Based on the information assessed in the Final Section 4(f) Evaluation (Appendix C), and after careful and thorough consideration, the FAA determined that there is no feasible and prudent alternative to avoid the use of the Section 4(f) resource. The Proposed Action includes all possible planning to minimize harm resulting from the use of the Section 4(f) resource (Appendix C in the ALN ATCT Final EA).

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

VI. FINDING

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

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

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

APPROVED: _____

DISAPPROVED: _____

Edith A. Bowdish
Infrastructure Engineering Group Manager
Central Service Area
Federal Aviation Administration

RIGHT OF APPEAL

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