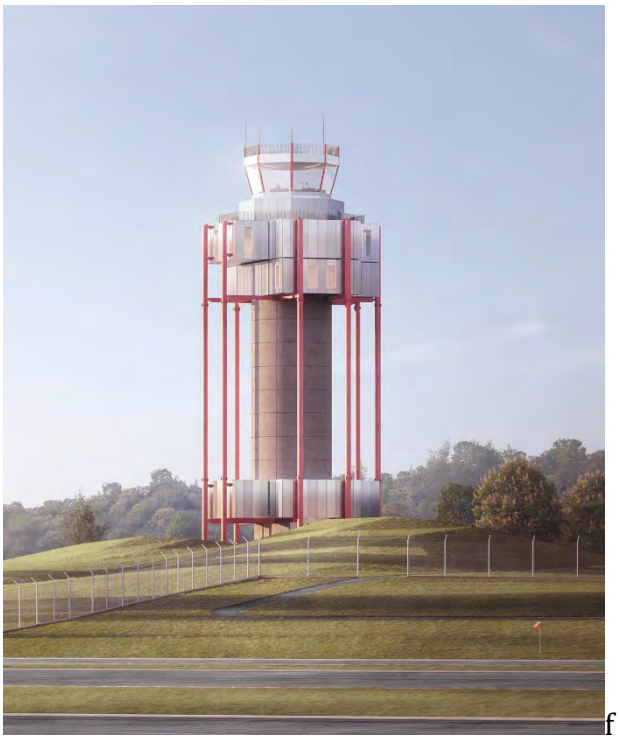
Airport Traffic Control Tower (ATCT) Replacement Program

St. Louis Regional Airport (ALN) ATCT Final Tiered Environmental Assessment (EA)

East Alton, Illinois

July 2025

 f

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ACRONYMS AND ABBREVIATIONS

AGL ..... Above Ground Level
ALN ..... St. Louis Regional Airport
ALP..... Airport Layout Plan
AMSL ..... Above Mean Sea Level
AOA ..... Air Operations Area
APE ..... Area of Potential Effects
ATCT ..... Air Traffic Control Tower
ATO ..... Air Traffic Organization
BIL ..... Bipartisan Infrastructure Law
BLM..... Bureau of Land Management
BMPs ..... Best Management Practice
CEQ ..... Council on Environmental Quality
CFR ..... Code of Federal Regulations
CSA..... Central Service Area
CZMA .... Coastal Zone Management Act
DNR..... Department of Natural Resources
DOI ..... Department of Interior
DOT..... Department of Transportation
EA ..... Environmental Assessment
ECOS ..... Environmental Conservation Online System
EOSH ..... Environmental and Occupational Safety & Health
EPA ……..Environmental Protection Agency
ESA ..... Endangered Species Act
FAA .....Federal Aviation Administration
FBO ..... Fixed Base Operator
FIRM ..... Flood Insurance Rate Map
FONSI/ROD ..... Finding of No Significant Impact / Record of Decision
FSL ..... Facility Security Level
LOS ..... Line of Sight
NA ..... Not Applicable
NAS ..... National Airspace System
N.D. ..... No Date
NEPA ..... National Environmental Policy Act
NMFS ..... National Marine Fisheries Service
NOAA ..... National Oceanic and Atmospheric Administration
NRHP ..... National Register of Historic Places
PEA ..... Programmatic Environmental Assessment
RTR..... Remote Transmitter / Receiver
SHPO ..... State Historic Preservation Officer
SMS ..... Safety Management System
SWPPP..... Stormwater Pollution Prevention Plan
TCPs .....Traditional Cultural Properties
USFWS..... U.S. Fish and Wildlife Service
VISTA ..... Virtual Immersive Siting Tower Assessment

SECTION 1 | INTRODUCTION

1.1 OVERVIEW

The Federal Aviation Administration (FAA) is proposing to replace the existing Airport Traffic Control Tower (ATCT) at St. Louis Regional Airport (ALN) in East Alton, Illinois. 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 Law (BIL), appropriated $25 billion (B) over a five-year period (Fiscal Year 2022 [FY22] to 2026 [FY26]) for National Airspace System (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*;[2] 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 ALN tiers[3] 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 Finding of No Significant Impact / Record of Decision (FONSI/ROD).

1.2 PROPOSED ACTION

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

- Acquisition of new lease with the airport authority to construct ATCT in a new location.

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

[2] FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, was published on June 30th, 2025. Preparation of the ATCT Final PEA (2023) and this Final EA were completed pursuant to FAA Order 1050.1F and all current Executive Orders and applicable case law.

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

- 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.

The estimated construction start date to replace the ATCT is September 2025.

1.3 BACKGROUND

1.3.1 Airport Information

The St. Louis Regional Airport (ID: ALN) is located in east central Madison County within southwestern Illinois, and serves the cities of Alton, East Alton, Bethalto, Edwardsville, St. Louis, and the southwest Illinois region. The airport is located 3 miles east of downtown East Alton. This 1,430-acre airport supports more than 80,000 operational services annually. ALN provides general aviation services and serves as a designated reliever airport to Lambert St. Louis International Airport for corporate flights. ALN offers support facilities including a fixed base operator, Enterprise Rent-A-Car, and other commercial tenants (St. Louis Regional Airport, n.d.). The airport is owned and operated by the St. Louis Regional Airport Authority.

The area around the airport is generally agricultural, residential, and commercial in nature. The Village of Bethalto borders much of the airport property, except to the south which is bordered by the City of Wood River, and the unincorporated area of Rosewood Heights which borders the western boundary. Utilities, including natural gas and electric for the airport are provided by AmerenIP and are accessible via underground conduits adjacent to the site. Water is accessible onsite and is provided by the Village of Bethalto.

1.3.2 Existing Airport Traffic Control Tower Information

Constructed in 1966, the existing FAA-owned and operated ALN ATCT is a Type “O” design ATCT (see Figure 1-2). The existing ATCT cab is 325 square feet with cab eye level at 49 feet above ground level (AGL) (FAA, 2023a). The ATCT operates daily from 7:00 am to 10:00 pm. The ATCT is located 100 feet to the south of the ALN commercial service passenger terminal at (38° 53’ 27.76” N, 90° 03’ 16.92” W).

Figure 1-1. Aerial Image of the Airport Property

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

SECTION 2 | PURPOSE AND NEED

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

2.1 PURPOSE

The ALN ATCT is an FAA-owned contract tower proposed for replacement under the ATCT Replacement Program. The purpose of the Proposed Action is to replace the ALN 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, 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.

2.2 NEED

The FAA recognizes the need to provide continual air traffic control services at ALN. The existing ALN ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, lacks the personnel space requirements, lacks modern amenities, and may have 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.

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).[4] This siting process takes into consideration multiple technical criteria, as prescribed in Order 6480.4C.

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

This tiered EA evaluates the selected site alternative and no build alternative for the proposed replacement of the ALN 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 preliminary layout plan of the proposed replacement tower site.

3.1 ALTERNATIVE 1: PROPOSED ACTION (PREFERRED ALTERNATIVE)

The Proposed Action, as determined by the siting process governed by FAA Order 6480.4C,[5] is the construction and operation of a replacement ATCT at a site identified in the siting report as Site 1. The proposed new ATCT site, hereinafter referred to as the proposed new ATCT site is located at a latitude of 38° 53' 27.79" N and a longitude of 90° 03' 21.33" W, approximately 375 feet west from the existing ATCT, within the loop of Terminal Drive. The siting report deemed this location most technically feasible of the siting alternatives considered based on the siting criteria referenced in Chapter 2 of the PEA (FAA ATCT Final PEA, 2023).

The proposed new ATCT site provides the most optimal visibility of the considered alternatives for air traffic control. The proposed tower cab floor elevation would be 100 ft AGL and 640 ft above mean sea level (AMSL). This is the minimum height that would meet all siting criteria under the Safety Management System (SMS). At this height, controllers would have unobstructed views of all airport-controlled areas and all airborne traffic. The new tower would have an 8-sided, 440 square foot cab. The proposed ATCT design includes space for three air traffic controller positions: Ground Control, Local Control, and Supervisor. Stairs would be located opposite the Ground Control position. This proposed design would allow for a safe operating environment and would include upgrades for resistance against seismic events. New utilities would be installed from existing lines within or adjacent to the site. Existing local roads would be used for construction and maintenance traffic.

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

[5] Two other sites, Site 5 and Site 6, were also considered in the siting evaluation process. Visibility and impacts were assessed and documented to determine which sites were viable. Site 5 was determined to be non-viable due to loss of airport parking and Site 6 was determined to be non-viable due to lack of infrastructure, and debris from plowing and harvesting an adjacent agricultural field (FAA, 2023b).

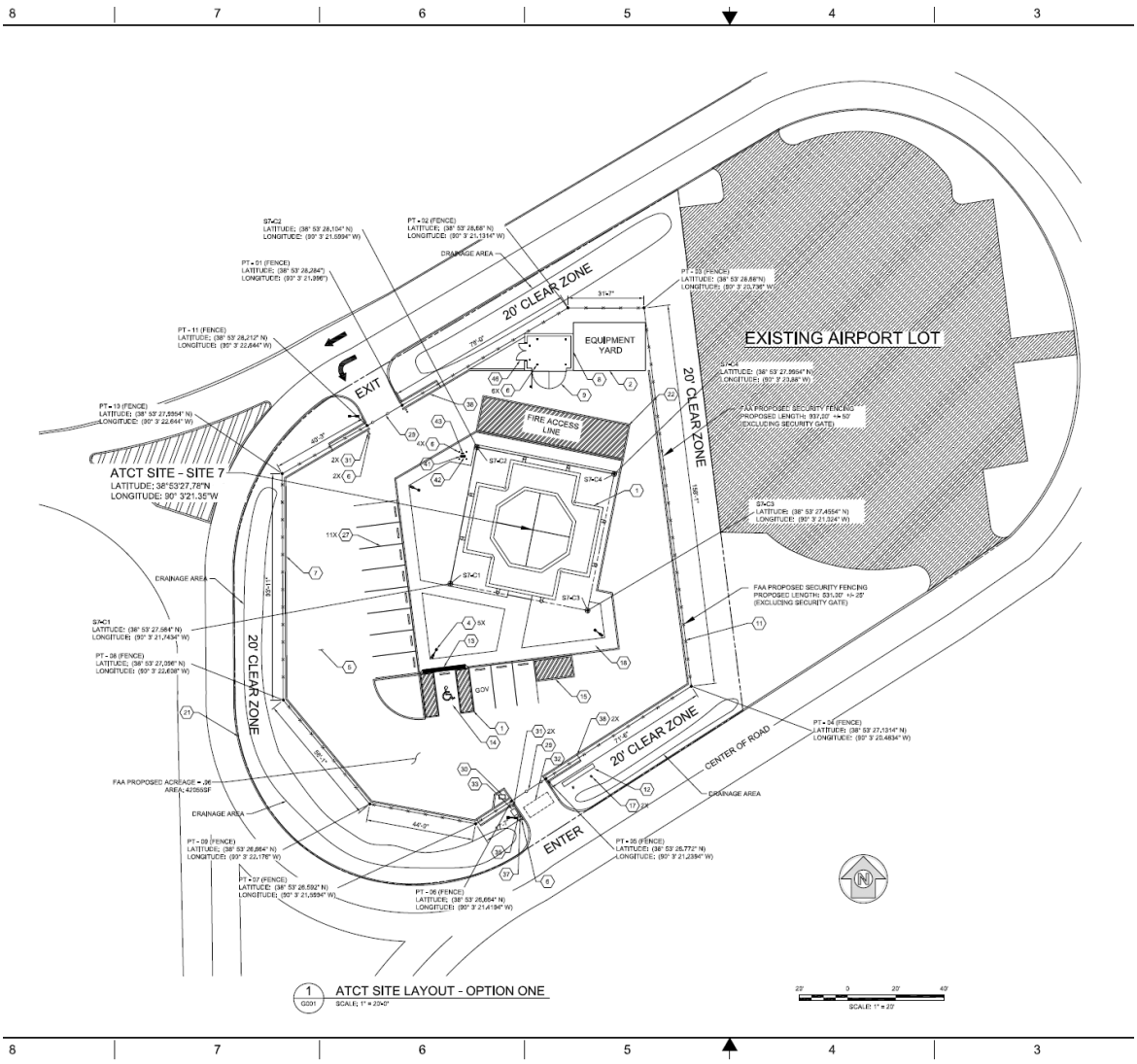

Figure 3-1. Layout of the Proposed New ALN ATCT

Source: (FAA, 2024b)

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 ALN 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 (FAA ATCT Final PEA, 2023). 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 PEA analysis.

4.1 RESOURCE CATEGORIES PREVIOUSLY CLEARED BY THE 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 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,[6] and Children's Environmental Health and Safety Risks

[6] 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 justice 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 six 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 – Section 4.2.2 includes a description of the existing environment and potential environmental consequences for coastal resources regulated by the National Oceanic and Atmospheric Administration (NOAA) under the Coastal Zone Management Act (CZMA) (16 U.S.C. §§ 1451 et seq.).
- 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.
- Department of Transportation (DOT) Act, Section 4(f) – Section 4.2.4 includes a description of the existing environment and potential environmental consequences for Section 4(f) properties on or near the ALN.
- Visual Effects – Section 4.2.5 includes a description of the existing environment and potential environmental consequences for visual effects.
- Water Resources – Section 4.2.6 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[7] or threatened[8]), and candidate[9] 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

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

[8] 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))

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

include those areas designated by the USFWS as critical habitat[10] protected by the Endangered Species Act (ESA) of 1973 (ESA; 16 U.S.C. Chapter 35 § 1531 et seq.).

4.2.1.1 Affected Environment

Vegetation

The ALN airport is in Environmental Protection Agency (EPA) Level III Ecoregion 72 (Interior River Valleys and Hills), just on the northern boundary of EPA Level III Ecoregion 39 (Ozark Highlands) (EPA, 2013). The airport study area (shown on Figure 1-1) is surrounded by property previously designated for aviation use (see Figure 4-2). The proposed new ATCT site and existing ATCT are both located in the northwest portion of the airport property, surrounded by land developed for aviation use. The proposed new ATCT site is located on previously disturbed land where a static military aircraft is on display, surrounded by mowed grass and landscaped shrubs. This proposed site is surrounded by existing airport structures, paved parking areas, runways, and road verges.

Vegetation within the study area is limited to frequently mowed grass where the static aircraft is currently located, several planted trees along the roadway median, and grassy facility yards that border the runways. The landscaped vegetation around the proposed new ATCT site consists of Sawara cypress (*Chamaecyparis pisifera*) and rose (*Rosaceae*) bushes. Grasses and forbs include Bermuda grass (*Cynodon dactylon),* little mouse-ear chickweed (*Cerastium fontanum*), and henbit deadnettle (*Lamium amplexicaule*). The existing ATCT landscaped grounds include small patches of gravel on either side of the sidewalk to the ATCT entrance, a paved parking area adjacent to the ATCT, and patches of Bermuda grass (*Cynodon dactylon*) throughout the open spaces. Trees south of the proposed ATCT site and southwest of the existing ATCT include eastern redbud (*Cercis canadensis*), eastern white pine (*Pinus strobus fastigiata*), white dogwood (*Cornus florida*), Norway spruce (*Picea abies*), red cedar (*Juniperus virginiana*), and pin oak (*Quercus palustris*). These trees would be removed to accommodate the relocation of the static aircraft. It is not anticipated that this vegetation originated of natural processes and these species are not designated as special status.

Wildlife and Fish

Due to the proposed new ATCT site being located within an active airport on a previously disturbed area, suitable habitat for wildlife species is not present. During the March 2024 site visit, airport staff noted the following species had been observed on site: deer (*Cervidae*), coyote (*Canis latrans*), sparrow (*Passeridae*), swan (*Cygnus*), hawk (*Buteo*), geese (*Anser*), and quail (*Coturnix coturnix*) (St. Louis Regional Airport, 2024). Coyotes and deer are most commonly sighted at the airport and the surrounding area. When these species are observed

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

on airport property, staff follow ALN Wildlife Hazard Management Plan guidance to safely remove them from the property. The airport maintains a Wildlife Hazard Observation Report to log species observed and document the action taken to manage presence (physically removal, honking car horn, or using pyrotechnics) (St. Louis Regional Airport, 2023)

The proposed new ATCT site is located within an area developed for the display of a static military aircraft. While stream fragments and marginal wetlands are present at the northern and southeastern boundaries of the study area, no aquatic or other native critical habitat is present within or adjacent to the existing or proposed new ATCT site. Common birds such as American robin (*Turdus migratorius*), non-native house sparrow (*Passer domesticus*), or mourning dove (*Zenaida macroura*) could use current structures for nesting or rearing of young. Highly mobile species such as birds, bats, or flying insects could be transiently present within the trees or disturbed grassy areas on-site; however, it is unlikely most wildlife would use the proposed site and existing ATCT site as permanent habitat.

ALN is obligated to comply with the Wildlife Hazard Management Plan requirements, standards, and recommendations made by the FAA in Advisory Circulars, as well as their ALN Wildlife Hazard Management Plan, to maintain a safe operating environment.

Special Status Species

Special status species generally occupy unique or specific habitat, such as riparian forests, wetlands, or native ecosystems. Due to the developed nature of the airport, it is highly unlikely any federal or state-listed threatened, endangered, or candidate species or species' critical habitat would be present within the airport study area (Figure 1-1).

Table 4-1 displays the federally listed species within Madison County, where ALN is located. According to the USFWS Environmental Conservation Online System (ECOS), there are 10 species known to occur within Madison County. A more focused search of the proposed and existing tower locations and surrounding areas using the USFWS Information for Planning and Consultation (IPaC) identified species not included in the county list, with other species from the county list not occurring, which are noted Not Applicable (NA) in the table below. Both USFWS lists are provided in Appendix A.

Table 4-1. Federally Listed Species

Common Name	Scientific Name	County Listed Status	Study Area Status
Monarch butterfly	*Danaus Plexippus*	Proposed Threatened	Proposed Threatened
Indiana bat[11]	*Myotis sodalist*	Endangered	Endangered
Pallid sturgeon	*Scaphirhynchus albus*	Endangered	NA
Spectaclecase	*Cumberlandia monodonta*	Endangered	Endangered
Northern long-eared bat	*Myotis septentrionalis*	Endangered	Endangered
Whooping crane	*Grus americana*	Experimental population, non-essential	NA

[11] The Indiana Bat (*Myotis sodalis*) is also identified as a species which may be in the vicinity of the project location according to the Illinois Department of Natural Resources Ecological Compliance Assessment Tool (EcoCat).

Common Name	Scientific Name	County Listed Status	Study Area Status
Tricolored bat	*Perimyotis subflavus*	Proposed endangered	Proposed Endangered
Least tern	*Sternula antillarum*	Recovery	NA
Decurrent false aster	*Boltonia decurrens*	Threatened	Threatened
Eastern prairie fringed orchid	*Platanthera leucophaea*	Threatened	Threatened
Eastern massauga	*Sistrurus catenatus*	NA	Threatened
Bald eagle	*Haliaeetus leucocephalus*	NA	Present

Source: (USFWS, 2023a) (USFWS, 2024b) (Illinois Department of Natural Resources, 2024)

A focused search for federally listed species within the airport study area resulted in the species listed in Table 4-1. No critical habitat for these species overlaps with the study area. Bat roosting habitat and hibernacula (places for bats to hibernate) are not present at the proposed new ATCT site. Bats could use the existing tower and/or the trees located to the south of the proposed new ATCT site as roosting habitat. Bat species could also use the proposed new ATCT site for foraging, although the sparse trees and open mowed spaces are not ideal foraging habitat.

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, n.d.). The species could use airport habitat for resting or feeding if flowering plants were present. However, no milkweed plants were identified during the site survey conducted in March 2024.

The presence of wetlands approximately 0.4-miles east of the proposed new ATCT site, and the neighboring uplands, do not present high quality habitat for these species as they are surrounded by paved runway and in a frequently disturbed area (see Section 4.2.6, Figure 4-4). No decurrent false aster or eastern prairie fringed orchid plants were identified during the site visit in March 2024. Given the disturbed nature of the land at the proposed new ATCT site and consistent mowing of the site, the available habitat and food sources are limited.

In addition to the federally listed species in Table 4-1, 21 other state listed species have been identified in Madison County (Illinois Department of Natural Resources, 2023). None of these species were observed during the site visit in March 2024. Species that are mobile, such as birds, small or flying mammals, or flying insects, could be found within the proposed new ATCT site, but due to the disturbed nature of the airport, it is unlikely that suitable habitat is present.

Migratory Birds

Illinois is located within the Mississippi Flyway for migratory birds, which many migratory species travel through as they move from wintering to nesting areas (USFWS, 2024). The USFWS lists 11 migratory birds as potentially using or passing through the project area. These species include the American golden-plover (*Pluvialis dominica*), bald eagle (*Haliaeetus leucocephalus*), black-billed cuckoo (*Coccyzus erythropthalmus*), chimney swift (*Chaetura pelagica*), lesser yellowlegs (*Tringa flavipes*), pectoral sandpiper (*Calidris melanotos*), prothonotary warbler (*Protonotaria citrea*) red-headed woodpecker (*Melanerpres erythrocephalus*), ruddy turnstone (*Arenaria interpres morinella*), rusty

blackbird (*Euphagus carolinus*), and wood thrush (*Hylocichla mustelina*). None of these species were observed during the March 2024 site visit, nor have they been documented on the ALN Wildlife Hazard Observation Report (St. Louis Regional Airport, 2024).

At ALN, the probability of presence for bald eagle is year-round, and the probability for black-billed cuckoo, chimney swift, prothonotary warbler, red-headed woodpecker, and wood thrush is likely during summer months. Probability of presence for the American golden-plover, lesser yellowlegs, pectoral sandpiper, ruddy turnstone, and rusty blackbird is less frequent throughout the year, as these species do not breed within the project area. (USFWS, 2023a)

According to the E-bird data mapping tool, the area around ALN has been surveyed and bald or golden eagles have not been observed on the airport property (The Cornell Lab of Ornithology, 2024). Because the bald eagle is a Bird of Conservation Concern in the study area, it warrants additional attention due to its inclusion in the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). Bald eagles could be migrating or breeding in the area and therefore bald eagle management guidelines would apply to any nests observed in the study area (USFWS, 2024a).

Invasive Species

According to the Illinois Department of Natural Resources (DNR), "an invasive species is any not native to a particular ecosystem, including its seeds, spores, or other biological material capable of propagating that species and whose introduction does or is likely to cause economic or environmental harm" (Illinois Department of Natural Resources, 2024). These species are often transported by human activity, and once introduced to a new location, may spread by land, water, animals, and again, humans. Invasive terrestrial plant species could be present within or surrounding the proposed new ATCT site and the existing ATCT location. Plants such as tree-of-heaven (*Ailanthus altissima*), stripe rust (*Puccinia striiformis*), wine raspberry (*Rubus phoenicolasius*), Southern corn rust (*Puccinia polysora*), red clover (*Trifolium pratense*), and white clover (*Trifolium repens*) are able to thrive in the silt loam and urban landscape present within the study area; however, these species were not observed around the existing or proposed tower sites during the March 2024 site visit (University of Georgia, 2024) (USDA, 2024).

Noxious and invasive plant species can be spread by vehicles, machinery, and wildlife, and also by natural forces such as by wind or water. The vegetation around the existing tower and at the proposed new ATCT site is well maintained and frequently mowed, thereby preventing the spread of noxious weeds and invasive plant species. 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 (FAA ATCT Final PEA, 2023) and FAA Order 1050.1 Desk Reference, Section 2.3.1 (FAA, 2020a).

Alternative 1: Proposed Action

The Proposed Action would involve construction on a previously disturbed portion of the ALN property. While the area is not completely paved, it is cleared and staged for the display of a static aircraft. The existing grass at the proposed new ATCT site is continuously mowed and disturbed to support the static aircraft display. The Proposed Action would involve removing the static aircraft and paving the proposed new ATCT site area to construct the new ATCT. It would also involve relocating the static aircraft to the south of the proposed new ATCT site, where existing trees are planted in the roadway median. These trees would be removed to accommodate the proposed replacement ATCT.

No critical or suitable habitat exists at this location and construction activities are not likely to impact any protected vegetation, wildlife and fish, migratory birds, or special status species. The airport follows an existing Wildlife Hazard Management Plan to prevent wildlife from inhabiting the airport property. These practices would continue in the same manner with the new replacement tower operations, and there would be no change in impacts to wildlife.

The proposed new ATCT site is within a developed area on the airport property with existing exterior lighting. As the proposed new ATCT site is surrounded by existing airport buildings, it is not anticipated that utility connections or new access roads would disturb additional open space or potential habitat. Although the new tower cab would be taller than the existing tower, the new exterior lighting is unlikely to result in any new effects on wildlife species. The increase of human foot traffic, vehicle traffic, and heavy equipment use during construction and demolition could introduce noxious weeds and invasive, non-native plant species within and surrounding the construction and demolition sites; however, this area is already vulnerable to vehicular and pedestrian traffic that may introduce these invasive species, impacts are not anticipated to be significant. A short-term, temporary increase in noise and lighting would occur during construction and demolition, but these impacts are not anticipated to cause a permanent increase to noise or light-sensitive species at the proposed new ATCT site following construction completion.

Based on the lack of suitable habitat and presence of existing development and aviation operations within the study area, the effect determination under the ESA would be 'No effect.' No significant impacts to biological resources are expected in the preferred alternative.

Alternative 2: No Action Alternative

Under the No Action Alternative, the existing 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 addition,

adherence to the ALN Wildlife Hazard Management Plan would help prevent wildlife from remaining on the airport property.

Vehicle and equipment cleaning prior to accessing construction and demolition sites would be required to reduce the potential introduction and spread of noxious weeds. While impacts to potential stream habitat north of the proposed new ATCT site are not anticipated, mitigation and BMPs that would prevent, reduce, or capture sediment and runoff would be applied to the construction and demolition sites to diminish or preclude impacts.

4.2.2 Coastal Resources

Coastal resources are the natural resources occurring within coastal waters and adjacent shorelands. Coastal resources include islands, transitional and intertidal areas, salt marshes, wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as fish and wildlife and their respective habitats within these areas.

While Illinois has an approved Coastal Zone Management Plan under the Coastal Zone Management Program the Illinois Coastal Zone is not located on or near the ALN airport (NOAA, 2022). The FAA has no further obligation under the CZMA (16 U.S.C. §§ 1451 et seq.) and therefore, this resource category does not require additional analysis within this EA.

4.2.3 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).

4.2.3.1 Affected Environment

In accordance with applicable federal laws and regulations, the FAA evaluated the proposed alternatives and area of potential effects (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. The APE is defined as the area shown on Figure 4-1.

The existing ATCT on the property, constructed in 1966, is of a Type "O" tower type (Figure 1-1). 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 first Type "O" tower was commissioned in February 1965 and the last in 1968 (FAA, 2021).

Booz Allen Hamilton prepared a report that evaluated the eligibility of the existing ATCT and other historic-age resources on the airport property for the National Register of Historic Places (NRHP) (Booz Allen Hamilton, 2024). This report recommended: (1) the existing ATCT as individually eligible for the NRHP under Criteria A and C; (2) the former airport terminal and administration building (now a flight school), the fire and rescue building, three T-hangars, a box hangar, the West Star Aviation hangar, and a former fixed-base operator (FBO) parts and display building (now an airport administration building) as not individually eligible for the NRHP; and (3) the Civic Memorial Airport district as not eligible for the NRHP. Due to previous ground disturbance within the project area, no archaeological work was recommended.

No historic properties are shown within a one-mile radius of the airport on the National Park Service's NRHP Database and the public-facing side of Illinois Historic & Architectural Resources Geographic Information System (NPS, 2024) (Illinois State Historic Preservation Office, n.d.).

4.2.3.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for historical, architectural, archaeological, and cultural resources impacts can be reviewed in the ATCT Final PEA (FAA ATCT Final PEA, 2023) and FAA Order 1050.1 Desk Reference, Chapter 8 (FAA, 2020a).

Alternative 1: Proposed Action

The Proposed Action would adversely impact the existing ATCT, eligible for the NRHP under Criteria A and C. The demolition of the historic existing ATCT would constitute an adverse effect. 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.

In September 2024, the FAA determined a Finding of Adverse Effect due to the proposed demolition of the existing ATCT. Under Section 106 of the NHPA, on October 8, 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 on October 11, 2024 (Appendix A). The FAA received a response from the Quapaw Nation on October 16, 2024, 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. Public involvement for the Section 106 process was integrated with this project's NEPA process. The Draft EA was available for public comment through the FAA's dedicated website (https://www.faa.gov/air_traffic/atf). No comments were received.

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

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 (Appendix B). On April 11, 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 proposed mitigation measures contained therein (see Section 4.2.3.3). 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).

Alternative 2: No Action Alternative

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

4.2.3.3 Mitigation

For the Proposed Action, the FAA coordinated with the Illinois 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 included plans for a qualified contractor to complete a Level II Historic Illinois Building Survey (HIBS) in accordance with NPS guidelines (NPS, 2023).

4.2.3.4 Unanticipated Discovery

As mentioned in letters to Section 106 consulting parties, if during construction, demolition, and/or maintenance activities any unanticipated cultural resources are discovered, activities would cease in the area of the resource and the appropriate state, federal, and tribal officials would be notified and given the opportunity to review (FAA, 2020a). The uncovered resources would be protected. In compliance with all applicable laws and regulations, the FAA would coordinate with the appropriate consulting parties and consider their recommendations, conduct appropriate actions, then provide a report of those actions after they are completed (36 CFR 800.13).

4.2.4 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 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, 2020a).

4.2.4.1 Affected Environment

In general, actions that have the potential to affect Section 4(f) properties involve a physical or constructive use. Further details on what constitutes a physical or constructive occupation of the property may be found in the ATCT Final PEA (FAA ATCT Final PEA, 2023).

According to the Bureau of Land Management (BLM) National Data Viewer, there are no recreational sites or wildlife refuges listed within the ALN study area (Bureau of Land Management, 2024).

As described in Section 4.2.3, the existing ALN 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 a Section 4(f) resource (DOT, n.d.(a)).

In addition, the proposed new ATCT site overlaps with a 0.8-acre display area for a static military aircraft within Terminal Drive. The retired aircraft is a McDonnell Douglas F-4C Phantom II interceptor/fighter bomber jet that entered service in 1961. This area is accessible to the public and includes three benches, sidewalks, and a placard that describes the static aircraft (see Figure 4-1). Although this area is publicly owned and open to the public, its major purpose is not as a park, recreation area, or refuge, nor is it significant as a park, recreation area, or refuge (DOT, n.d.(b)). The static aircraft is characterized as a recreational feature used by airport visitors to learn about the locally manufactured aircraft. The area is not zoned as a parkland nor treated as such by the airport or the County. As such, this area would not be considered a park or site of local significance and therefore is not categorized as a Section 4(f) resource.[12]

[12] Note that construction of the replacement ALN ATCT would not permanently impact the static aircraft display. The static aircraft display area would be relocated approximately 220 feet south of the existing ALN ATCT and would only temporarily be unavailable during construction activities.

Figure 4-2. Static Military Aircraft at Proposed New ATCT Site

Outside the study area, the nearest Section 4(f) resource is Kutter Park, located 0.97 miles southwest of the proposed new ATCT site. This park is a 30.5-acre greenspace with a playground, nature trails, baseball fields, disc golf, and pickleball courts for public use.

No other historic properties are shown within a one-mile radius of the airport on the National Park Service's NRHP Database and the public-facing side of Illinois Historic & Architectural Resources Geographic Information System (NPS, 2024) (Illinois State Historic Preservation Office, n.d.).

4.2.4.2 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 (FAA ATCT Final PEA, 2023) and FAA Order 1050.1 Desk Reference, Section 5.3.7 (FAA, 2020a).

Alternative 1: Proposed Action

The demolition of the NRHP-eligible existing ATCT would adversely impact and result in a 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 response concurred that the ALN ATCT is eligible for the 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. Further, the response concurred with the findings that demolition of the ALN ATCT would be an adverse effect and noted the proposed mitigation to undertake a Level 2 HIBS as an "acceptable level of mitigation". The DOI response 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". The DOI expressed a continuing interest in working with the FAA to ensure impacts to resources of concern are adequately addressed (see Appendix C).

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.

Alternative 2: No Action Alternative

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

4.2.4.3 Mitigation

As described in Section 4.2.3.3, the FAA coordinated with the Illinois 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 included plans for a qualified contractor to complete a Level II HIBS in accordance with NPS guidelines (NPS, 2023).

4.2.5 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, 2020a)

4.2.5.1 Affected Environment

The proposed new ATCT site is located on existing airport property, approximately 370 feet west of the existing tower (see Figure 1-1). The site is adjacent to a paved parking lot and surrounded by the Terminal Drive access road, both areas with existing overhead lighting. The area surrounding the proposed new ATCT site consists of existing buildings including the tower, hangars, and parking lots. The nearest visual resource is the residential area located approximately 0.5-miles west of the study area. Once constructed, the new tower would be one of the highest structures in the viewshed.

Light Emission

The existing ALN ATCT operates from 7:00 AM to 10:00 PM daily and lighting of the runways, taxiways, and other airfield safety lights are controlled by air traffic controllers. At this time, the airport operates in the standard configuration at night with light emissions from the following areas: runways, taxiways, navigational aids, apron areas, parking lots, terminal building, and the tower. The study area is bordered by N Bellwood Drive and Route 255 to the west and taxiways to the east. Due to the surrounding transportation corridor and existing airport facilities, the site of the proposed new tower has existing lighting that illuminates the area at night.

Wildlife, especially nocturnal species, may be sensitive to nighttime light sources which may disrupt migratory or breeding cycles. As mentioned in Section 4.2.2, the light-sensitive Indiana bat and northern long-eared bat were not identified as a species of concern within the study area. With the limited trees (and some to be removed) within the study area, it is not likely that these mobile species would utilize habitat surrounding the tower for roosting or nesting.

Visual Resources and Visual Character

The area around the study area is characterized as airport land use, general commercial, and light industrial. Commercial properties are located along the western boundary of the airport property. Visual resources surrounding the airport property include the Rosewood Heights residential area to the west, several businesses, and agricultural fields. Aside from the 49-foot AGL existing ATCT, the tallest building near the airport property is the Bethalto water tower, located approximately 0.2-miles west of the proposed new ATCT site.

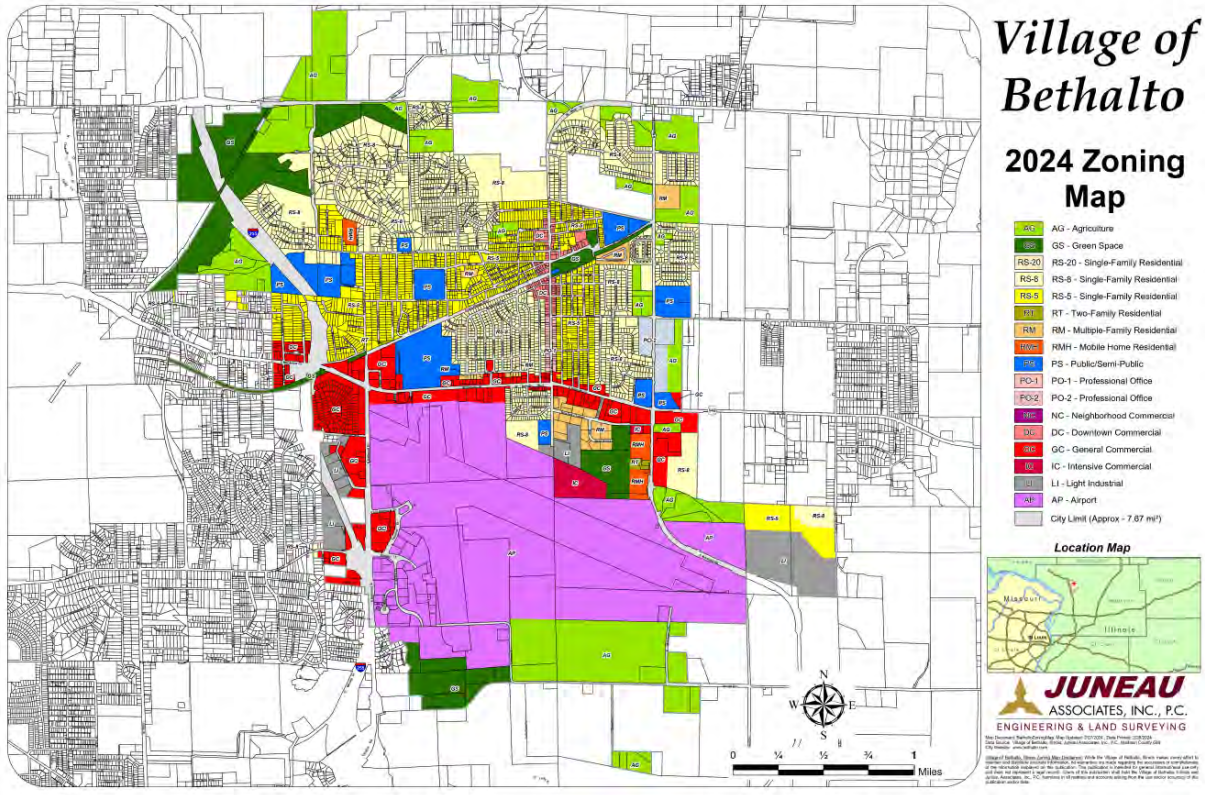

Figure 4-3. Village of Bethalto Zoning Map

Source: (Village of Bethalto, 2024)

4.2.5.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for visual resource impacts can be found in the ATCT Final PEA (FAA ATCT Final PEA, 2023) and FAA Order 1050.1 Desk Reference, Section 13.3.3 (FAA, 2020a).

Alternative 1: Proposed Action

The proposed new ATCT site is located approximately 370 feet west of the existing ATCT and is surrounded by lit roadway. As the area is equipped with existing lighting, the Proposed Action would not impose any change to light emissions in the immediate area. While light emissions may be increased temporarily during construction, the change in location of light emission from the existing tower to the new tower is not anticipated to create additional light emissions once the existing tower is decommissioned when the new tower is operational.

The proposed new tower height (top of tower) is 135 feet AGL, which is the shortest possible height that meets all siting criteria. The proposed new ATCT site provides the best line of sight (LOS) to movement areas, presence of existing infrastructure, and an unobstructed view of all areas of responsibility for the ALN airport. Therefore, this location was determined to be the best available location for visibility of airport traffic control (FAA, 2023a). The reflective surfaces of the proposed new ATCT and support building could alter the visual character of the airport area due to the tower height and change to the viewshed.

The nearest visual resource to the proposed new ATCT site is the Rosewood Heights residential area. This resource would not be impacted by the decommissioning of the existing tower and construction of the new, taller tower; the study area is greater than 0.45 miles to the east of Rosewood Heights and the new tower site would only change by 370 feet. From this distance, the visual character would remain unchanged. The changes in lighting would not affect the visual nature of the existing developed area and the existing lighting present at the airport. The Proposed Action is consistent with the visual character of the airport and would not contrast or obstruct the visual character or resources of the area. The new ATCT would replace the existing ATCT on the airport's property once the existing tower is decommissioned.

Alternative 2: No Action Alternative

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

4.2.5.3 Best Management Practices

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

4.2.6 Water Resources

Water resources 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.

4.2.6.1 Affected Environment

Wetlands

The USFWS shows the nearest wetlands as a 0.66-acre freshwater emergent wetland located 0.38 miles east of the proposed new ATCT and another 1.70-acre freshwater emergent wetland located 0.70 miles east of the proposed new ATCT and within the air operations area (AOA), shown on Figure 4-3 (USFWS, 2024c). These wetlands are situated within a grass patch surrounded by paved runway and are therefore not anticipated to be of high quality. There are no wetlands located within the immediate project area of the existing or proposed ATCTs.

Floodplains

According to the Flood Insurance Rate Map (FIRM) for the airport location, the Proposed Action is in a Zone C area identified as having minimal flooding (Federal Insurance Administration, 1980). The nearest river to the study area is the East Fork Wood River. The nearest tributary to this river is located approximately 0.5-miles northwest of the study area.

Surface Water

There are no man-made or naturally occurring ponds or lakes within the proposed project area; however, there are two small surface waters located approximately 0.4 miles east of the existing ATCT and a catchment located at the northeastern portion of the airport property. There is also a catchment that transects the airport property south of the study area. Neither of these catchments are within the immediate project area. As mentioned above, there are tributaries to East Fork Wood River within the airport property; however, these tributaries are not located near the proposed or existing ATCT sites (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 3 miles southwest of the study area. This aquifer is associated with the Mississippi River and its tributary, Wood River. The flow of groundwater within the study area is to the southwest towards the Mississippi River. (USGS, 2024a)

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 Middle Fork Vermillion River, located approximately 140 miles west of the study area near Champaign, Illinois.

4.2.6.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for water resource impacts can be found in the ATCT Final PEA (FAA ATCT Final PEA, 2023) and FAA Order 1050.1 Desk Reference, Sections 14.1.3 through 14.5.3.1 (FAA, 2020a).

Alternative 1: Proposed Action

Construction of the new ATCT would cause temporary, short term surface disturbing activities in the span of approximately four acres involving increased vehicle traffic and use of machinery. No direct impacts to wetlands would occur due to the absence of these areas within the study area. Indirect impacts to wetlands are unlikely to occur given the nearest wetland area is approximately 0.38 miles east of the proposed new ATCT site and the existing ATCT. Implementing BMPs that include erosion and sedimentation controls would reduce or prevent potential impacts to downstream waters.

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 and the existing ATCT but is unlikely due to the distance and location of the nearest tributary. Soil, sediment, or chemical runoff could directly or indirectly damage water quality, alter 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/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 ALN stormwater system. The ALN Stormwater Pollution Prevention Plan (SWPPP) notes eight primary outfalls on airport property. The existing tower and area on the west side of the airport drain northwest towards Outfall #001 discharging to a tributary to the East Fork Wood River (Hanson Professional Services, Inc., 2023). Discharging this water could result in sediment and chemical runoff where outflow occurs. 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, ALN 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 existing ATCT would not be removed and replaced, and activities associated with the existing ATCT would remain the same. No impacts to existing water resources would occur.

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

4.2.6.3 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. Descriptions of these BMPs for wetlands, surface water, and groundwater are below.

Measures for reducing runoff and erosion impacts would prevent or reduce sediment and the introduction of non-native plant species from degrading nearby water resources Avoidance and minimization measures include adjusting plans to reduce or prevent any encroachment or damage to wetlands and directing runoff from construction/demolition activities away from wetlands or other aquatic habitat. (FAA, 2020a).

- Use pervious surfaces where practicable.
- Control runoff, while ensuring the runoff control measure 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 REASONABLY FORESEEABLE IMPACTS

This site-specific analysis included an evaluation of past, present, and reasonably foreseeable 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.

The only ongoing projects at ALN are the West Star Aviation ramp expansion and Hangar 67 construction. West Star Aviation broke ground in July 2023 to construct Hangar 67 adjacent to the existing Hangar 66 on the southwest end of the airport. This expansion would allow for an increase in indoor workspace. The expansion includes 40,000 square feet of new hangar capacity, 22,300 square feet of additional back shop space, and adds 13,400 square feet of storage space. As the projects are near completion, construction is not anticipated to interfere with the construction of the replacement ATCT or contribute to cumulative

impacts. While these projects are being constructed within the study area, they are located approximately 0.5 miles south of the proposed new ATCT site. Both projects are expected to be complete well before the start of construction of the proposed new ATCT; therefore, temporary increased traffic and noise impacts from overlapping construction schedules are not anticipated.

During construction activities, minor erosion and sedimentation may occur. The proposed new ATCT would not contribute to a significant adverse cumulative impact to natural resources or energy supply. The sustainable design of the proposed new ATCT is anticipated to exhibit energy and water efficiencies, thereby reducing energy and resource supply needs.

Implementation of BMPs would further reduce the potential for any identified limited impacts.

4.4 CONCLUSION

This site-specific EA evaluates the existing environment at ALN and analyzes the potential environmental consequences of the Proposed Action. The reasonably foreseeable impacts of the proposed new replacement ATCT presented in this EA are not anticipated to result in significant impacts to either human health or the environment.

SECTION 5 | PUBLIC INVOLVEMENT

The FAA is provided a 508-compliant electronic copy of the Draft EA for review by the public on the following website: https://www.faa.gov/air_traffic/atf on October 9, 2024. Concurrently the FAA published a Notice of Availability advertisement in *The Alton Telegraph* to advertise the availability of the Draft EA to allow the public to view the document electronically and how to submit comments. The FAA did not receive any comments on the Draft EA during the 30-public comment period.

On April 11, 2025, the FAA provided its Finding of Adverse Effect and the draft MOA to the ACHP, Landmarks Illinois, IDOT, and the aforementioned potential consulting parties identified in Section 4.2.3.2 as part of the FAA's continued consultation efforts to resolve adverse effects to the existing ATCT. Concurrently, the FAA published a Notice of Availability advertisement in *The Alton Telegraph* to advertise the availability of the draft MOA and the Section 4(f) evaluation to allow the public to participate in the consultation activities and to provide comments. The FAA did not receive any additional comments on the MOA or Section 4(f) evaluation from the interested parties or the public. The FAA and consulting parties executed the MOA on June 26, 2025, to implement the proposed mitigation measures contained therein. On July 2, 2025, the ACHP acknowledged receipt of the executed Section 106 MOA (see Section 4.2.3.1 and Appendix B).

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SECTION 7 | REFERENCES

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APPENDIX A FEDERALLY LISTED SPECIES REPORTS FOR MADISON 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 and Illinois Department of Natural Resources for Madison County, Illinois. Appendix A also provides site-specific species lists, critical habitat, migratory birds, and other information.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Southern Illinois Sub-Office
Southern Illinois Sub-office
8588 Route 148
Marion, IL 62959-5822
Phone: (618) 998-5945
Email Address: Marion@fws.gov
https://www.fws.gov/office/illinois-iowa-ecological-services

In Reply Refer To: 03/25/2025 14:01:50 UTC
Project Code: 2025-0073499
Project Name: ALN

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 attached species list identifies federally threatened, endangered, proposed and candidate species that may occur within the boundary of your proposed project or may be affected by your proposed project. The list also includes designated critical habitat, if present, within your proposed project area or affected by your project. This list is provided to you as the initial step of the consultation process required under section 7(c) of the Endangered Species Act, also referred to as Section 7 Consultation. If you determine that other federally protected species not listed in this Official Species List are present in your action area, you are still responsible to analyze your potential effects to those species and consult with the U.S. Fish and Wildlife Service if consultation is required.

Under 50 CFR 402.12(e) (the regulations that implement Section 7 of the Endangered Species Act) **the accuracy of this species list should be verified after 90 days**. This verification can be completed formally or informally. You may verify the list by visiting the Information for Planning and Consultation (IPaC) website https://ipac.ecosphere.fws.gov at regular intervals during project planning and implementation and completing the same process you used to receive the attached list.

Section 7 Consultation

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the U.S. Fish and Wildlife Service

(Service) if they determine their project "may affect" listed species or designated critical habitat. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action may affect endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service to make "no effect" determinations. If you determine that your proposed action will have no effect on threatened or endangered species or their respective designated critical habitat, you do not need to seek concurrence with the Service.

Note: For some species or projects, IPaC will present you with *Determination Keys*. You may be able to use one or more Determination Keys to conclude consultation on your action for species covered by those keys.

Technical Assistance for Listed Species

1. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain information on the species life history, species status, current range, and other documents by selecting the species from the thumbnails or list view and visiting the species profile page.???????

No Effect Determinations for Listed Species

1. If there are *no* species or designated critical habitats on the Endangered Species portion of the species list: conclude "no species and no critical habitat present" and document your finding in your project records. No consultation under ESA section 7(a)(2) is required if the action would result in no effects to listed species or critical habitat. Maintain a copy of this letter and IPaC official species list for your records.
2. If any species or designated critical habitat are listed as potentially present in the **action area** of the proposed project the project proponents are responsible for determining if the proposed action will have "no effect" on any federally listed species or critical habitat. No effect, with respect to species, means that no individuals of a species will be exposed to any consequence of a federal action or that they will not respond to such exposure.
3. If the species habitat is not present within the action area or current data (surveys) for the species in the action area are negative: conclude "no species habitat or species present" and document your finding in your project records. For example, if the project area is located entirely within a "developed area" (an area that is already graveled/paved or supports structures and the only vegetation is limited to frequently mowed grass or conventional landscaping, is located within an existing maintained facility yard, or is in cultivated cropland conclude no species habitat present. Be careful when assessing actions that affect: 1) rights-of-ways that contains natural or semi-natural vegetation despite periodic mowing or other management; structures that have been known to support listed species (example: bridges), and 2) surface water or groundwater. Several species inhabit rights-of-ways, and you should carefully consider effects to surface water or groundwater, which often extend outside of a project's immediate footprint.
4. Adequacy of Information & Surveys - Agencies may base their determinations on the best evidence that is available or can be developed during consultation. Agencies must give the benefit of any doubt to the species when there are any inadequacies in the information. Inadequacies may include uncertainty in any step of the analysis. To provide adequate information on which to base a determination, it may be appropriate to conduct surveys to determine whether listed species or their habitats are present in the action area. Please contact our office for more information or see the survey guidelines that the Service has made available in IPaC.

May Effect Determinations for Listed Species

1. If the species habitat is present within the action area and survey data is unavailable or inconclusive: assume the species is present or plan and implement surveys and interpret results in coordination with our office. If assuming species present or surveys for the species are positive continue with the may affect determination process. May affect, with respect to a species, is the appropriate conclusion when a species might be exposed to a consequence of a federal action and could respond to that exposure. For critical habitat, 'may affect' is the appropriate conclusion if the action area overlaps with mapped areas of critical habitat and an essential physical or biological feature may be exposed to a consequence of a federal action and could change in response to that exposure.
2. Identify stressors or effects to the species and to the essential physical and biological features of critical habitat that overlaps with the action area. Consider all consequences of the action and assess the potential for each life stage of the species that occurs in the action area to be exposed to the stressors. Deconstruct the action into its component parts to be sure that you do not miss any part of the action that could cause effects to the species or physical and biological features of critical habitat. Stressors that affect species' resources may have consequences even if the species is not present when the project is implemented.
3. If no listed or proposed species will be exposed to stressors caused by the action, a 'no effect' determination may be appropriate – be sure to separately assess effects to critical habitat, if any overlaps with the action area. If you determined that the proposed action or other activities that are caused by the proposed action may affect a species or critical habitat, the next step is to describe the manner in which they will respond or be altered. Specifically, to assess whether the species/critical habitat is "not likely to be adversely affected" or "likely to be adversely affected."
4. Determine how the habitat or the resource will respond to the proposed action (for example, changes in habitat quality, quantity, availability, or distribution), and assess how the species is expected to respond to the effects to its habitat or other resources. Critical habitat analyses focus on how the proposed action will affect the physical and biological features of the critical habitat in the action area. If there will be only beneficial effects or the effects of the action are expected to be insignificant or discountable, conclude "may affect, not likely to adversely affect" and submit your finding and supporting rationale to our office and request concurrence.
5. If you cannot conclude that the effects of the action will be wholly beneficial, insignificant, or discountable, check IPaC for species-specific Section 7 guidance and conservation measures to determine whether there are any measures that may be implemented to avoid or minimize the negative effects. If you modify your proposed action to include conservation measures, assess how inclusion of those measures will likely change the effects of the action. If you cannot conclude that the effects of the action will be wholly beneficial, insignificant, or discountable, contact our office for assistance.
6. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

For additional information on completing Section 7 Consultation including a Glossary of Terms used in the Section 7 Process, information requirements for completing Section 7, and example letters visit the Midwest Region Section 7 Consultations website at: https://www.fws.gov/library/collections/midwest-region-section-7-consultations.

https://www.fws.gov/office/midwest-region-headquarters/midwest-section-7-technical-assistance

You may find more specific information on completing Section 7 on communication towers and transmission lines on the following websites:

- Incidental Take Beneficial Practices: Power Lines - https://www.fws.gov/story/incidental-take-beneficial-practices-power-lines
- Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning. - https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation

Tricolored Bat Update

On September 14, 2022, the Service published a proposal in the Federal Register to list the tricolored bat (Perimyotis subflavus) as endangered under the Endangered Species Act (ESA). The Service has up to 12-months from the date the proposal published to make a final determination, either to list the tricolored bat under the Act or to withdraw the proposal. The Service determined the bat faces extinction primarily due to the rangewide impacts of white-nose syndrome (WNS), a deadly fungal disease affecting cave-dwelling bats across North America. Because tricolored bat populations have been greatly reduced due to WNS, surviving bat populations are now more vulnerable to other stressors such as human disturbance and habitat loss. Species proposed for listing are not afforded protection under the ESA; however, as soon as a listing becomes effective (typically 30 days after publication of the final rule in the Federal Register), the prohibitions against jeopardizing its continued existence and "take" will apply. Therefore, if your future or existing project has the potential to adversely affect tricolored bats after the potential new listing goes into effect, we recommend that the effects of the project on tricolored bat and their habitat be analyzed to determine whether authorization under ESA section 7 or 10 is necessary. Projects with an existing section 7 biological opinion may require reinitiation of consultation, and projects with an existing section 10 incidental take permit may require an amendment to provide uninterrupted authorization for covered activities. Contact our office for assistance.

Bald and Golden Eagles

Although no longer protected under the Endangered Species Act, be aware that bald eagles are protected under the Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act, as are golden eagles. Projects affecting these species may require measures to avoid harming eagles or may require a permit. If your project is near an eagle nest or winter roost area, please contact our office for further coordination. For more information on permits and other eagle information

visit our website https://www.fws.gov/library/collections/bald-and-golden-eagle-management.

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries

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:

Southern Illinois Sub-Office
Southern Illinois Sub-office
8588 Route 148
Marion, IL 62959-5822
(618) 998-5945

PROJECT SUMMARY

Project Code: 2025-0073499
Project Name: ALN
Project Type: Airport - New Construction
Project Description: ATCT Replacement
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@38.8895486,-90.04503336532812,14z

Counties: Madison County, Illinois

ENDANGERED SPECIES ACT SPECIES

There is a total of 9 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.

Project code: 2025-0073499 03/25/2025 14:01:50 UTC

MAMMALS

NAME	STATUS
Indiana Bat *Myotis sodalis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat *Perimyotis subflavus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

REPTILES

NAME	STATUS
Eastern Massasauga (=rattlesnake) *Sistrurus catenatus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2202	Threatened

CLAMS

NAME	STATUS
Spectaclecase (mussel) *Cumberlandia monodonta* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7867	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
Western Regal Fritillary *Argynnis idalia occidentalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Decurrent False Aster *Boltonia decurrens* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7705	Threatened

9 of 11

Project code: 2025-0073499 03/25/2025 14:01:50 UTC

NAME	STATUS
Eastern Prairie Fringed Orchid *Platanthera leucophaea*	Threatened

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/601

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.

IPAC USER CONTACT INFORMATION

Agency: Federal Aviation Administration
Name: Madison Clark
Address: 1349 West Peachtree St NW
Address Line 2: Suite 1400
City: Atlanta
State: GA
Zip: 30309
Email clark_madison@bah.com
Phone: 7813722592

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

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)

EcoCAT
Ecological Compliance Assessment Tool

Applicant:	Federal Aviation Administration	*IDNR Project Number:*	2504570
Contact:	Marissa Carvalho	*Date:*	10/07/2024
Address:	10101 Hillwood Pkwy. Fort Worth, TX 76177		
Project:	St. Louis Regional Airport (ALN) Airport Traffic Control Tower Replacement		
Address:	8 Terminal Dr, East Alton		

Description: Replacement of existing Airport Traffic Control Tower (ATCT), demolition of existing ATCT

Natural Resource Review Results

This project was submitted for information only. It is not a consultation under Part 1075.

The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location:

Indiana Bat *(Myotis sodalis)*

Location
The applicant is responsible for the accuracy of the location submitted for the project.

County: Madison

Township, Range, Section:
5N, 9W, 13

IL Department of Natural Resources Contact
Impact Assessment Section
217-785-5500
Division of Ecosystems & Environment

Government Jurisdiction
Other

Disclaimer

The Illinois Natural Heritage Database cannot provide a conclusive statement on the presence, absence, or condition of natural resources in Illinois. This review reflects the information existing in the Database at the time of this inquiry, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, compliance with applicable statutes and regulations is required.

Terms of Use

By using this website, you acknowledge that you have read and agree to these terms. These terms may be revised by IDNR as necessary. If you continue to use the EcoCAT application after we post changes to these terms, it will mean that you accept such changes. If at any time you do not accept the Terms of Use, you may not continue to use the website.

IDNR Project Number: 2504570

1. The IDNR EcoCAT website was developed so that units of local government, state agencies and the public could request information or begin natural resource consultations on-line for the Illinois Endangered Species Protection Act, Illinois Natural Areas Preservation Act, and Illinois Interagency Wetland Policy Act. EcoCAT uses databases, Geographic Information System mapping, and a set of programmed decision rules to determine if proposed actions are in the vicinity of protected natural resources. By indicating your agreement to the Terms of Use for this application, you warrant that you will not use this web site for any other purpose.

2. Unauthorized attempts to upload, download, or change information on this website are strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986 and/or the National Information Infrastructure Protection Act.

3. IDNR reserves the right to enhance, modify, alter, or suspend the website at any time without notice, or to terminate or restrict access.

Security

EcoCAT operates on a state of Illinois computer system. We may use software to monitor traffic and to identify unauthorized attempts to upload, download, or change information, to cause harm or otherwise to damage this site. Unauthorized attempts to upload, download, or change information on this server is strictly prohibited by law.

Unauthorized use, tampering with or modification of this system, including supporting hardware or software, may subject the violator to criminal and civil penalties. In the event of unauthorized intrusion, all relevant information regarding possible violation of law may be provided to law enforcement officials.

Privacy

EcoCAT generates a public record subject to disclosure under the Freedom of Information Act. Otherwise, IDNR uses the information submitted to EcoCAT solely for internal tracking purposes.

APPENDIX B SECTION 106 CONSULTATION AND MEMORANDUM OF AGREEMENT (MOA)

This appendix contains the correspondence for the Section 106 consultation and the signed MOA.

From: Wallace, Carol
To: aaron.commowith@faa.gov
Cc: Salerno, Jennifer M-CTR (FAA); Salerno, Jennifer [USA]; Williams, Courtney CTR (FAA); Williams, Courtney [USA]; Baker, Rita E
Subject: [External] Section 106 Consultation for Proposed FAA ATCT - East Alton, IL
Date: Wednesday, November 13, 2024 4:07:24 PM
Attachments: image001.png
MOA template for Federal 106 - 5-30-24.docx
Section 106 Guide to Adverse Effects.pdf

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Aaron,

Thank you for your letter regarding consultation to resolve the adverse effect of the Airport Traffic Control Tower Replacement, SHPO Log #00110082. According to our October 11, 2024 letter: The Airport Traffic Control Tower (ATCT) is individually eligible for listing on the National Register of Historic Places at the local and State level of significance under Criteria A for Communications and Criteria C as a 1966 constructed Type O Tower designed by I. M. Pei. The proposal to demolish this tower constitutes an adverse effect as defined in 36 CFR 800.5.

Would you provide your availability for the next few weeks, and I'll schedule a Webex to discuss consultation? I've attached our standard MOA template and our Guide to Adverse Effects for your convenience.

CJ Wallace
Regulatory Review & Compliance
217-761-0104 Remote
217-785-5027 Office

HISTORIC Preservation DIVISION

MEMORANDUM OF AGREEMENT AMONG
THE FEDERAL AVIATION ADMINISTRATION
AND THE ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE ST. LOUIS REGIONAL AIRPORT
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT
8 TERMINAL DRIVE, EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)

WHEREAS, the Federal Aviation Administration (FAA) plans to undertake replacement of the St. Louis Regional Airport (ALN) Airport Traffic Control Tower (ATCT), including construction and operation of a new ATCT and demolition of the existing ATCT (Tower), at 8 Terminal Drive, East Alton, IL 62024 (Project); and

WHEREAS, the project requires FAA funding and involves FAA property, thereby making the Project an Undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, 54 U.S.C. § 306108, and its implementing regulations (36 CFR Part 800) (Act); and

WHEREAS, the FAA is the lead agency for complying with Section 106 of the NHPA; and

WHEREAS, the FAA has defined the Undertaking's area of potential effect (APE), as defined at 36 CFR part 800.16(d), to correspond to the geographic area within which the Undertaking may directly or indirectly cause alterations in the character or use of historic properties; and

WHEREAS, the FAA has consulted with the Illinois State Historic Preservation Office (SHPO), a Division of the Illinois Department of Natural Resources (IDNR), pursuant to the Act; and

WHEREAS, the SHPO currently resides within IDNR (Office), and the Director of IDNR is the duly designated State Historic Preservation Officer (Officer); and

WHEREAS, on October 11, 2024, the Officer has determined that no historic archaeological properties will be affected by the Undertaking; and

WHEREAS, the FAA has determined that the Tower at 8 Terminal Drive, East Alton, IL 62024 is eligible to be listed on the National Register of Historic Places (NRHP); and

WHEREAS, the FAA has determined that the Undertaking will have an adverse effect on the Tower that is eligible for the NRHP; and

WHEREAS, on October 11, 2024, the Officer concurred with the FAA that the Tower is individually eligible for listing on the NRHP and that the Undertaking will have an adverse effect on the Tower; and

WHEREAS, the public was notified of the Undertaking and given an opportunity to comment on the adverse effect in a notice published in the *Alton Telegraph* and on the FAA's dedicated Air Traffic Facilities website (https://www.faa.gov/air_traffic/atf) on October 9, 2024 with no comments received; and

WHEREAS, on April 11, 2025, the FAA notified potential consulting parties of the adverse effect determination, and on May 12, 2025, the St. Louis Regional Airport has chosen to participate in the consultation to resolve the adverse effect; and

WHEREAS, on April 11, 2025, the FAA notified Tribal Nations of the adverse effect determination, and none have chosen to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1) and 36 CFR § 800.10(b), the FAA has notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect determination, and on April 29, 2025, the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, the FAA and the Officer agree that the Undertaking shall be implemented in accordance with the following stipulations in this Memorandum of Agreement (Agreement) in order to mitigate the adverse effects of this Undertaking to the NRHP-eligible property.

STIPULATIONS

The FAA, in coordination with the Officer, shall ensure that the following measures are carried out:

I. MITIGATION PLAN (Historic Illinois Buildings Survey [HIBS])

A. The FAA shall retain a historical contractor(s) of its choice (Contractor) who meets the Secretary of the Interior's Qualifications (36 CFR Part 61, https://www.nps.gov/history/local-law/arch_stnds_9.htm) to complete a Level II Historic Illinois Buildings Survey (HIBS) according to the measures described below.

1. The FAA will ensure that the mitigation is completed by the Contractor, as stipulated in I. Mitigation Plan.
2. The recordation must follow the HIBS guidelines established by the Officer, according to the specifications listed in Attachment A.
3. The Contractor must coordinate with the FAA prior to the initiation of the work to ensure that expectations are understood.
4. Fieldwork, in the form of a site visit, draft photography, measurements, and final photography must take place before the Project may commence.
5. Upon completion of draft photography, the Contractor shall digitally submit the images and copies of field notes to the FAA for review and comment. The FAA

will submit these materials to the Officer for review and comment.

6. Upon FAA and Officer confirmation in writing that all of the final HIBS photographs to complete HIBS recordation has been collected, the demolition of the existing Tower may commence.
7. The Contractor shall prepare and email a 95% draft of the HIBS recordation in .pdf format to the FAA for review and comment. The FAA will submit these materials to the Officer for review and comment.
8. When the FAA and the Officer accept the 95% draft submission, in writing, the Contractor shall incorporate into the recordation any comments that the FAA and Officer provide and complete the final documentation.
9. Upon completion of the final documentation, the FAA shall submit the following to the Officer:
   a. One archival clamshell of sufficient size to encapsulate the HIBS recordation.
   b. One copy of the HIBS recordation, on archival materials, according to HIBS specifications for deposit in the Abraham Lincoln Presidential Library and Museum.
   c. One digital record (download, link, flash drive, CD, or DVD) with the complete HIBS recordation for posting on the SHPO website.

II. DURATION

This Agreement shall expire two years from the data of execution of this Agreement or at such time as all of its terms are satisfied. Prior to such time, the FAA may consult with the other signatories to reconsider the terms of the Agreement and amend it in accordance with Stipulation VII AMENDMENTS below. .

III. POST-REVIEW DISCOVERIES

If potential historic properties are encountered or unanticipated effects on historic properties found during implementation of the Undertaking, the FAA shall immediately consult with the Officer and Tribes and make reasonable efforts to avoid, minimize, or mitigate adverse effects to such properties. In the event of an unanticipated encounter of human remains or burials, the FAA must immediately stop work within 100 feet of the area, notify the Coroner, Officer, and Tribes, and comply with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) and pertinent sections of the Human Remains Protection Act (20 ILCS 3440).

IV. MONITORING AND REPORTING

Each year following the execution of this Agreement until it expires or is terminated, the FAA shall provide all parties to this Agreement a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in the

FAA's efforts to carry out the terms of this Agreement.

V. DISPUTE RESOLUTION

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

A. Forward all documentation relevant to the dispute, including any timely advice or comments regarding the dispute from the signatories and concurring parties and the FAA's proposed resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. The FAA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FAA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the Agreement and provide them and the ACHP with a copy of such written response.

C. The FAA's responsibility to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.

VI. AMENDMENTS

This Agreement may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy is signed by all of the signatories.

VII. TERMINATION

If any signatory to this Agreement determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulations VI and VII above. If within thirty (30) days an amendment cannot be reached, any signatory may terminate the Agreement upon written notification to the other signatories.

Once this Agreement is terminated, and prior to work continuing on the Undertaking, the FAA must either (a) execute a Memorandum of Agreement pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36

CFR § 800.7. The FAA shall notify the signatories as to the course of action it will pursue.

VIII. COUNTERPARTS; FACSIMILE OR .PDF SIGNATURES

This Agreement may be executed in counterparts, each of which shall be considered an original and together shall be one and the same Agreement. A facsimile or .pdf copy of this Agreement and any signatures thereon will be considered for all purposes as an original.

IX. DISTRIBUTION OF AGREEMENT

In order to meet the requirements of Section 106, 36 CFR § 800.6(b)(1)(iv), upon the execution of this Agreement and prior to approving the Undertaking, the FAA must transmit to the ACHP the executed Agreement along with the documentation specified in Section 800.11(f).

EXECUTION of this Agreement and implementation of its terms is evidence that the FAA has taken into account the effects of this Undertaking on historic properties and afforded the Officer and the ACHP an opportunity to comment.

MEMORANDUM OF AGREEMENT AMONG
THE FEDERAL AVIATION ADMINISTRATION
AND THE
ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE ST. LOUIS REGIONAL AIRPORT
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT 8 TERMINAL DRIVE,
EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)

SIGNATORY

FEDERAL AVIATION ADMINISTRATION

Signature: EDITH A BOWDISH Digitally signed by EDITH A BOWDISH Date: 2025.06.18 11:53:36 -05'00' Date: _____

Name: Edith Bowdish

Title: Manager, CSA ES Engineering Support Group, AJW-2C16

MEMORANDUM OF AGREEMENT AMONG
THE FEDERAL AVIATION ADMINISTRATION
AND THE
ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE ST. LOUIS REGIONAL AIRPORT
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT 8 TERMINAL DRIVE,
EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)

SIGNATORY

ILLINOIS DEPUTY STATE HISTORIC PRESERVATION OFFICER (OFFICER)

By: Carey L. Mayer Digitally signed by Carey L. Mayer Date: 2025.06.17 15:48:02 -05'00' Date: 6/17/2025

Carey L. Mayer, AIA
Deputy State Historic Preservation Officer
Illinois Department of Natural Resources

MEMORANDUM OF AGREEMENT AMONG
THE FEDERAL AVIATION ADMINISTRATION
AND THE
ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE ST. LOUIS REGIONAL AIRPORT
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT 8 TERMINAL DRIVE,
EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)

CONCURRING PARTY

ST. LOUIS REGIONAL AIRPORT

Signature: Danny Adams Digitally signed by Danny Adams Date: 2025.06.25 10:45:43 -05'00' Date: _____

Name: Danny Adams

Title: Airport Director

July 2, 2025

Aaron Comrov
Environmental Team Lead
Federal Aviation Administration

Ref: *St. Louis Regional Airport Air Traffic Control Tower Replacement*
Alton, Madison County, Illinois
ACHP Project Number: 022636

Dear Mr. Comrov:

On June 27, 2025, the Advisory Council on Historic Preservation (ACHP) received a copy of the executed Section 106 agreement document (Agreement) for the referenced undertaking. In accordance with 36 CFR § 800.6(b)(1)(iv), the ACHP acknowledges receipt of the Agreement. The filing of the Agreement and implementation of its terms fulfills the requirements of Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800).

We appreciate receiving a copy of this Agreement for our records. Please ensure that all consulting parties are provided a copy of the executed Agreement in accordance with 36 CFR § 800.6(c)(9). If you have any questions or require additional assistance, please contact Bill Marzella at (202) 517-0209 or by e-mail at bmarzella@achp.gov and reference the ACHP Project Number above.

Sincerely,

Lucrecia Brooks
Historic Preservation Technician
Office of Federal Agency Programs

APPENDIX C SECTION 4(F) EVALUATION AND CORRESPONDENCE

This appendix contains the DOT Section 4(f) evaluation and concurrence correspondence received from DOI.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

May 7, 2025

4112.1
ER 25/0166

Aaron Comrov
Federal Aviation Administration (FAA)
2300 East Devon Avenue, Suite 450
Des Plaines, IL 60018

RE: St. Louis Regional Airport Air Traffic Control Tower Draft DOT 303(c) Section 4(f) Evaluation, East Alton, IL

Dear Aaron Comrov,

The U.S. Department of the Interior (Department), including the National Park Service (NPS), has reviewed the draft Section 4(f) evaluation for the replacement of an Airport Traffic Control Tower (ATCT) at St. Louis Regional Airport (ALN) in East Alton, Illinois. The purpose of the Proposed Action is to replace the ALN ATCT with a modern ATCT providing for uninterrupted air traffic control services.

The project sponsor is the Federal Aviation Administration (FAA) as the lead federal agency. The draft Section 4(f) evaluation considers the effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project. Only potential effects to National Register of Historic Places (NRHP)-eligible resources were analyzed in this evaluation. No other Section 4(f) resources such as publicly owned parks, recreation areas, and wildlife and waterfowl refuges were presented in this determination.

The evaluation considered three alternatives. The No Action Alternative would not meet the purpose and need to replace the ALN ATCT and is therefore, not a feasible and prudent alternative. The Retain Existing ATCT Alternative would build a new ATCT in a different location while retaining the existing ATCT. This alternative could result in compromises to air traffic safety, would be prohibitive and inconsistent with the mission of the FAA, and is therefore not a feasible and prudent alternative. The Proposed Action Alternative (preferred alternative) would demolish the existing ATCT and replace it with a new, modern, and sustainable ATCT facility. The preferred alternative was the only alternative that met the purpose and need and could incorporate mitigation efforts to minimize overall harm to Section 4(f) resources.

Section 4(f) Determinations
The NRHP evaluation identified one historic site, the existing ATCT, as a Section 4(f) resource. No other historic or archaeological sites are located within the project area. The FAA determined that the construction of a new ATCT under the Proposed Action Alternative would have an indirect adverse effect and constructive use on the existing ATCT by obstructing its viewshed and eliminating its integrity of setting and association. They also found that removal and demolition of the existing ATCT would result in a direct, adverse effect and permanent use of the Section 4(f) resource. To mitigate impacts of the preferred alternative, the FAA consulted and developed a draft Memorandum of Agreement (MOA) with the Illinois State Historic Preservation Officer (SHPO), and other consulting parties under Section 106 of the National Historic Preservation Act (NHPA). The MOA contains mitigation requirements for the impacts to the Section 4(f) resource. The FAA found there was no feasible and prudent avoidance alternative to the use of the existing ATCT and included all possible planning to minimize harm.

Section 4(f) Comments
The NPS reviewed the draft Section 4(f) evaluation for the ATCT project at ALN and has made the following comments. The control tower is eligible for the NRHP under Criterion C (36 CFR 60.4) as it was designed by master architect I.M. Pei. It is also eligible under Criterion A for its historical representation of the construction and implementation of a FAA National Air Space. The ATCT is not nationally significant but is significant at the local and state level. No National Historic Landmarks (NHLs) are in the area. NPS concurs with the findings of the consultant and the SHPO that demolition of the control tower would be an adverse effect. The SHPO's proposed mitigation for the adverse effect is to undertake level 2 Historic Illinois Building Survey (HIBS) documentation. As determined by the Historical Architect for the NPS Midwest Region, this is an acceptable level of mitigation.

The Department's review concurs 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. The Department recommends that coordination continue with all consulting parties and the project follow the agreed upon measures outlined in the finalized Section 106 MOA.

The Department has a continuing interest in working with the FAA to ensure impacts to resources of concern are adequately addressed. For matters related to these comments, please coordinate with Hanna Daly, Regional Environmental Coordinator, NPS serving Department of Interior Regions 3, 4, and 5 (hanna_daly@nps.gov). We appreciate the opportunity to provide these comments.

Sincerely,

JOHN NELSON Digitally signed by JOHN NELSON
Date: 2025.05.07 13:09:38 -04'00'

John V. Nelson
Regional Environmental Officer

Electronic distribution: aaron.comrov@faa.gov

Airport Traffic Control Tower (ATCT) Replacement Program

St. Louis Regional Airport (ID: ALN) ATCT Department of Transportation (DOT) Section 303(c) Section 4(f) Evaluation

East Alton, Illinois

June 2025

This DOT 4(f) Evaluation (also referred to as a Section 303(c) Evaluation) is submitted for review pursuant to the following public law requirements: Section 102(2)(c) of the National Environmental Policy Act of 1969; 49 United States Code (U.S.C.) §47106, Section 303 of 49 U.S.C., Subtitle I; and Section 106 of the National Historic Preservation Act of 1966.

Table of Contents

SECTION 1 | INTRODUCTION

The Federal Aviation Administration (FAA) is proposing to replace the existing Airport Traffic Control Tower (ATCT) at St. Louis Regional Airport (ALN) in East Alton, Illinois. The FAA's Proposed Action is to replace the existing FAA-owned ATCT with a modern, sustainable ATCT facility at ALN providing for uninterrupted air traffic control services. See Section 1.3, Project Description, for activities involved with the ATCT replacement.

The FAA prepared this Department of Transportation (DOT) Section 4(f) Evaluation to include as an appendix to the Environmental Assessment (EA). This document includes the regulatory context, descriptions of the proposed project and its purpose and need, determination of Section 4(f) applicability, Section 4(f) property and use, measures taken to minimize harm, alternatives analysis, mitigation of impacts, and coordination with Officials having jurisdiction of DOT Section 4(f) lands regarding potential effects of the proposed project.

1.1 Regulatory Context

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

DOT Section 4(f):

> Provides that the Secretary of Transportation may approve a transportation program or project requiring the use of publicly owned land off a public park, recreation area or wildlife or waterfowl refuge of national, state or local significance, or land of a historic site of national, State, or local significance, only if there no feasible and prudent alternative to the using of that land and the program or project includes all possible planning to minimize harm resulting from the use.

Specifically, programs or projects requiring the use of Section 4(f) lands cannot be approved by the FAA unless:

- There are no prudent and feasible alternatives to the property's use and
- The project includes all possible planning to minimize harm; or
- After avoidance, minimization, and mitigation will result in a de minimis impact to the property.

FAA Order 1050.1F identifies definitions for "feasible and prudent" that follow the Federal Highway Administration (FHWA)/Federal Transit Administration (FTA) regulation (23 CFR § 774.17):

> "(1) a feasible and prudent alternative is one that avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially

outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the property (i.e., some Section 4(f) properties are worthy of a greater degree of protection than others).

(2) an alternative is not feasible if it cannot be built as a matter of sound engineering judgment.

(3) an alternative is not prudent if it:

- Compromises the project to such a degree that it is unreasonable to proceed with the project in view of its stated purpose and need (i.e., the alternative does not address the purpose and need of the project);
- Results in unacceptable safety or operational problems;
- Causes, after reasonable mitigation:
  - Severe social, economic, or environmental impacts,
  - Severe disruption to established communities,
  - Severe or disproportionate impacts to minority or low-income populations, or
  - Severe impacts to environmental resources protected under other Federal statutes;
- Results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
- Causes other unique problems or unusual factors; or
- Involves multiple factors above that, although individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude." (FAA, 2015)

A "use" of a Section 4(f) property occurs when:

- Land is permanently incorporated into a transportation project.
- There is temporary occupancy of land that is adverse in terms of the statute's preservation purpose.
- There is a constructive use of the property.
- The attributes of the property are substantially impaired.

When historic properties are involved, the FAA determines whether Section 4(f) compliance applies and whether a use will occur and whether a de minimis determination can be made for historic properties. A de minimis finding can only be made for impacts to a historic property when the following criteria is met:

- The Section 106 process results in a "no adverse effect" or "no historic properties affected" from the State Historic Preservation Officer (SHPO).

- The SHPO is informed of the *de minimis* impact determination by the FAA based on Section 106 concurrence.

For significant impacts to historic properties that are not considered *de minimis*, avoidance alternatives are required to be evaluated to provide justification and prove there are no feasible and prudent alternatives to use the Section 4(f) property. The project must address all possible planning to minimize harm to the resource.

1.2 PROJECT DESCRIPTION

The FAA's Proposed Action is to replace the existing FAA-owned Airport Traffic Control Tower (ATCT) with a modern, sustainable ATCT facility at St. Louis Regional Airport (ID: ALN). The Proposed Action is anticipated to include the following activities:

- Acquisition of new lease with the airport authority to construct ATCT in 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 United States Code (U.S.C.) §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.

The St. Louis Regional Airport (ID: ALN) (see Figure 1-1) is located in east central Madison County within southwestern Illinois and serves the cities of Alton, East Alton, Bethalto, Edwardsville, St. Louis, and the southwest Illinois region. The airport is located approximately 3 miles east of downtown East Alton. This 1,430-acre airport supports more than 80,000 operational services annually. ALN provides general aviation (GA) air services and serves as a designated reliever airport to Lambert St. Louis International Airport for corporate flights. ALN also offers support facilities including a fixed base operator, Enterprise Rent-A-Car, and other commercial tenants (St. Louis Regional Airport, n.d.). The St. Louis Regional Airport Authority owns and operates the airport.

The area around the airport is generally agricultural, residential, and commercial in nature. The Village of Bethalto borders much of the airport property, except for the southern airport boundary which is bordered by the City of Wood River, and the unincorporated area of Rosewood Heights which borders the western boundary. Utilities, including natural gas and electric, for the airport are provided by AmerenIP and are accessible via underground

conduits adjacent to the site. Water is accessible onsite and is provided by the Village of Bethalto.

Constructed in 1966, the existing FAA-owned ALN ATCT is a Type "O" design, Tier 4 facility, Facility Security Level (FSL) 2, ATCT (see Figure 3-1). The existing ATCT cab is 325 square feet with cab eye level at 49 feet above ground level (AGL) (FAA, 2023a). The ATCT operates daily from 7:00 am to 10:00 pm. The ATCT is located 100 feet to the south of the ALN commercial service passenger terminal, at 38° 53' 27.76" N, 90° 03' 16.92" W.

Figure 1-1. Aerial Image of the ALN Airport Property

1.3 PURPOSE AND NEED

1.3.1 Purpose

The ALN ATCT is an FAA-owned and operated tower proposed for replacement under the ATCT Replacement Program. The purpose of the Proposed Action is to provide ALN 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, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in energy savings, water efficiency, reduced carbon emissions, and improved indoor air quality.

1.3.2 Need

The FAA recognizes the need to provide continual air traffic control services at ALN. The existing ALN ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, lacks the personnel space requirements and modern amenities, and has 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.

1.4 IDENTIFICATION OF DOT SECTION 4(F) RESOURCES

To identify historic sites, the FAA enlisted Booz Allen Hamilton to prepare a report, *St. Louis Regional Airport (ALN) Airport Traffic Control Tower (ATCT) Facility National Register of Historic Places Eligibility Evaluation* (Booz Allen Hamilton, 2024). The report identified historic sites in the vicinity of ALN and evaluated the eligibility of the existing ATCT and other historic-age resources on the airport property by applying the National Register of Historic Places (NRHP) criteria in accordance with the National Park Service's guidelines (National Park Service, 1997). The NRHP evaluation identified one historic site, the existing ATCT, as a Section 4(f) resource. No other historic or archaeological sites are located within the project area. The SHPO concurred with the report's recommendations on October 11, 2024 (Appendix A).

The existing ALN ATCT (Figure 3-1) 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 the implementation of a NAS and as a well-preserved example of a modern master architect-designed ATCT. No previously recorded archeological resources were identified within or directly adjacent to the project area. Based on previous environmental reviews, no historic or cultural resources were previously identified within the APE (Booz Allen Hamilton, 2024).

Figure 3-2. Photo of Existing Type "O" ATCT at ALN

The proposed new ATCT site overlaps with a 0.8-acre display area for a static military aircraft within Terminal Drive. The retired aircraft is a McDonnell Douglas F-4C Phantom II interceptor/fighter bomber jet that entered service in 1961. This area is accessible to the public and includes three benches, sidewalks, and a placard that describes the static aircraft. Although this area is publicly owned and open to the public, its major purpose is not as a park, recreation area, or refuge, nor is it significant as a park, recreation area, or refuge (DOT, n.d.(b)). The static aircraft allows airport visitors to learn about the locally manufactured aircraft. The area is not zoned as a parkland nor treated as such by the airport or the County. As such, this area would not be considered a park or site of local significance and therefore is not categorized as a Section 4(f) resource.[1]

The EA did not identify any public parks, recreation areas, wildlife, or waterfowl refuges within the project area.

[1] Note that construction of the replacement ALN ATCT would not permanently impact the static aircraft display. The static aircraft display area would be relocated approximately 220 feet south of the existing ALN ATCT and would only temporarily be unavailable during construction activities.

1.5 PROPOSED PROJECT USE OF SECTION 4(F) PROPERTY

The project proposes to permanently demolish the NRHP-eligible structure. This action has an "adverse effect" to the historic structure as described in 36 CFR 800.5(a)(2)(i) of the regulations implementing Section 106 of the National Historic Preservation Act (NHPA) due to the change in character of the property's use. This adverse effect constitutes a "use" of the Section 4(f) property beyond the de minimis use as described above. Demolition of the NRHP-eligible existing ATCT would result in a permanent use of the Section 4(f) property.

SECTION 2 | ALTERNATIVES

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

2.1 METHODOLOGY FOR DETERMINATION OF IMPACTS

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

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 the certain properties of national, state, and/or local significance during transportation project development, such as:

- **Publicly owned parks.** This includes publicly owned land, open to the public, used as a public park.
- **Recreational areas.** This includes publicly owned land, open to the public, used as a recreational area, like a baseball complex, tennis court, or other recreational facility.
- **Wildlife and waterfowl refuges.** This includes publicly owned land used as a wildlife and waterfowl refuge that is open to the public.
- **Public and private historic sites.** This includes publicly or privately owned land of an historic site listed or eligible for listing on the National Register of Historic Places (NRHP) and considered a historic property under the National Historic Preservation Act of 1966 (NHPA) (P.L. 89–665, as amended by P.L. 96-515, 54 U.S.C. §300101 et seq.) and its implementing regulations (36 CFR Part 800).

In general, actions that have the potential to affect Section 4(f) resources involve a physical or constructive use. A physical use can include temporary occupancy for construction-related activities; physical occupation of the property; alteration of structures or facilities on the property; or a physical taking, such as purchase or a permanent easement of the property (FAA, 2020). A constructive use involves the project's proximity significantly impacting a Section 4(f) property so the attributes that qualify the property for protection are substantially impaired; this can include the effects of noise, vibration, access restrictions, visual impacts, ecological intrusions, etc.

The alternatives identified in this section include the Proposed Action and those that avoid the use of all Section 4(f) properties. The FAA evaluated these alternatives to determine if they would meet feasible and prudent guidelines.

Before approving a transportation project requiring the use of these properties, the FAA 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.

Feasibility refers to whether the alternative can be built as a matter of sound engineering judgement. An alternative would not be considered prudent if it:

- Compromises the project to a degree that it is unreasonable if it does not meet the purpose and need for the project.
- Results in unacceptable safety or operational problems.
- After reasonable mitigation is considered, severe social, economic, or environmental impacts; or severe impacts to environmental resources protected under other federal statutes.
- Results in additional construction, maintenance, or operational costs of extraordinary magnitude.
- Causes other unique problems or unusual factors; or
- Involves multiple factors as outlined above that, while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude (FHWA, 2024).

2.2 Alternative 1: Proposed Action (Preferred Alternative)

The Proposed Action is to demolish the existing ATCT after construction and commissioning of the proposed new ATCT. The demolition would include asbestos abatement and removal of other hazardous materials and proper disposal of the existing ATCT facility and associated infrastructure. Based on the location of the proposed new ATCT, the FAA found the Proposed Action to have an adverse effect under Section 106 for the existing ALN ATCT due to the direct effects of removal/demolition of the ATCT constituting a physical use under Section 4(f). To mitigate impacts of the preferred alternative, the FAA consulted and developed a Memorandum of Agreement (MOA) with the SHPO, and other consulting parties under Section 106 of the NHPA (see Sections 3 and 4). The MOA contains mitigation requirements for the impacts to the Section 4(f) resource (see Section 3).

2.3 Alternative 2: No Action

The No Action Alternative is defined as maintaining the status quo (baseline conditions) without federal agency action. 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. Alternative 2, the No Action Alternative, would not meet the purpose and need to replace the ALN ATCT. As this alternative does not meet the purpose and need, Alternative 2 is not a feasible and prudent alternative,

2.4 Alternative 3: Retain Existing ATCT

Under this alternative, demolition of the existing ALN ATCT would not occur and the tower would remain as is. The proposed new replacement ATCT would be constructed on the proposed new ATCT site to continue air traffic control services. The FAA would decommission and abandon the existing ALN ATCT for operational use. This alternative includes removing any valuable materials from the interior and exterior of the existing ALN ATCT. Access to the tower would be closed with fencing to address potential security concerns created by this alternative. Leaving the existing ATCT in place would present two

major issues: line of sight obstructions to the controllers occupying the proposed new ATCT and a significant investment of FAA resources and operational budget to maintain the existing ATCT as a vacant facility, which ultimately distracts from the FAA's core mission. Both issues could result in air traffic safety being compromised. Alternative 3 would be prohibitive and inconsistent with the mission of the FAA and is not a feasible and prudent alternative.

SECTION 3 | MITIGATION

As previously described, the FAA evaluated several alternatives that considered avoidance and minimization of effects for the existing ALN ATCT. Complete avoidance would not achieve the purpose and need for the project; therefore, mitigation measures for impacts to the ATCT have been developed during the Section 106 consultation process and included in the signed MOA prepared for this project (Appendix B). With the executed MOA, the FAA plans to implement the mitigation measure contained therein. The following is a summary of the agreed upon mitigation measure in the MOA:

> The FAA shall complete a Level II Historic Illinois Buildings Survey (HIBS) following the HIBS guidelines. The FAA shall provide a copy of the HIBS recordation, on archival materials according to HIBS specifications, for deposit in the Abraham Lincoln Presidential Library and Museum. A digital record with the complete HIBS recordation would be provided to the IL SHPO for posting on their website.

SECTION 4 | CONSULTATION AND COORDINATION

The FAA consulted with the Illinois SHPO and U.S. Department of Interior (DOI) to solicit comments on this project regarding Section 4(f). On April 11, 2025, the FAA provided DOI with the opportunity to review the Draft Section 4(f) Evaluation. On May 7, 2025, the FAA received concurrence from DOI on the Section 4(f) evaluation (Appendix C).

In addition, under Section 106 of the NHPA, on October 8, 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, 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 on October 11, 2024 (Appendix A). The FAA received a response from the Quapaw Nation on October 16, 2024, stating that the Quapaw Nation Historic Preservation Program believes that the undertaking will have no effect on known properties of cultural or sacred significance to the Quapaw Nation. No other parties have responded. Public involvement for the Section 106 process was integrated with this project's NEPA process. The Draft EA was available for public comment through the FAA's dedicated website (https://www.faa.gov/air_traffic/atf). No comments were received.

In coordination with the Illinois SHPO and other consulting parties, the FAA developed a MOA to resolve the proposed undertaking's adverse effect including agreed upon mitigation to resolve the undertaking's adverse effect under Section 106. On April 11, 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 agreed upon mitigation measure contained therein (Appendix B).

SECTION 5 | FINDING

Based on the information evaluated in this document, and after careful and thorough consideration, the FAA determined that there are no feasible and prudent alternatives to the use of DOT Section 4(f) resources (the existing ATCT). The Proposed Action includes efforts to minimize impacts to DOT Section 4(f) resources through consultation with the SHPO and development of an MOA. Mitigation for the adverse impact to the ATCT would include a Level II Historic Illinois Buildings Survey of the existing ATCT. Results of the survey would be archived with the Illinois SHPO and in the Abrahm Lincoln Presidential Library and Museum. The MOA has been signed before finalization of the EA documentation (Appendix B). All possible planning to minimize and mitigate harm is being incorporated into the project in accordance with Section 4(f) requirements.

SECTION 6 | LIST OF PREPARERS

This Section 4(f) Evaluation was prepared by:

FAA

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

Booz Allen Hamilton

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M.S., Environmental Studies, American University
B.S., Biology, University of Maryland at College Park

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

Courtney Williams – Cultural Resources Specialist
M.A., Historical Archaeology, University of Massachusetts Boston
B.A., Anthropology, College of William & Mary
B.S., Environmental Science, College of William & Mary

SECTION 7 | REFERENCES

Booz Allen Hamilton. (2024). *St. Louis Regional Airport (ALN) Airport Traffic Control Tower (ATCT) Facility National Register of Historic Places Eligiblity Evaluation.* Arlington, VA: Booz Allen Hamilton.

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APPENDIX A | SHPO COORDINATION

Illinois Department of Natural Resources
www.dnr.illinois.gov

Madison County
East Alton
Airport Traffic Control Tower Replacement
8 Terminal Dr.
SHPO Log #001100824

October 11, 2024

Aaron Comrov
Federal Aviation Administration
2300 E. Devon Ave.
Room 450
Des Plaines, IL 60018

We have reviewed the information provided regarding the above referenced project. Our review is required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties." The Airport Traffic Control Tower (ATCT) is individually eligible for listing on the National Register of Historic Places at the local and State level of significance under Criteria A for Communications and Criteria C as a 1966 constructed Type O Tower designed by I. M. Pei.

The proposal to demolish this tower constitutes an adverse effect as defined in 36 CFR 800.5.

At this time, you should work with this office to develop a plan to mitigate this adverse effect. Please note that the tower must not be demolished prior to the resolution of the disposition of this historic property.

Please contact CJ Wallace, Cultural Resources Coordinator, at (217) 785-5027 or at Carol.Wallace@illinois.gov with any questions.

Sincerely,

Carey L. Mayer

Carey L. Mayer, AIA
Deputy State Historic Preservation Officer

APPENDIX B | MEMORANDUM OF AGREEMENT

**MEMORANDUM OF AGREEMENT AMONG
THE FEDERAL AVIATION ADMINISTRATION
AND THE ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE ST. LOUIS REGIONAL AIRPORT
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT
8 TERMINAL DRIVE, EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)**

WHEREAS, the Federal Aviation Administration (FAA) plans to undertake replacement of the St. Louis Regional Airport (ALN) Airport Traffic Control Tower (ATCT), including construction and operation of a new ATCT and demolition of the existing ATCT (Tower), at 8 Terminal Drive, East Alton, IL 62024 (Project); and

WHEREAS, the project requires FAA funding and involves FAA property, thereby making the Project an Undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, 54 U.S.C. § 306108, and its implementing regulations (36 CFR Part 800) (Act); and

WHEREAS, the FAA is the lead agency for complying with Section 106 of the NHPA; and

WHEREAS, the FAA has defined the Undertaking's area of potential effect (APE), as defined at 36 CFR part 800.16(d), to correspond to the geographic area within which the Undertaking may directly or indirectly cause alterations in the character or use of historic properties; and

WHEREAS, the FAA has consulted with the Illinois State Historic Preservation Office (SHPO), a Division of the Illinois Department of Natural Resources (IDNR), pursuant to the Act; and

WHEREAS, the SHPO currently resides within IDNR (Office), and the Director of IDNR is the duly designated State Historic Preservation Officer (Officer); and

WHEREAS, on October 11, 2024, the Officer has determined that no historic archaeological properties will be affected by the Undertaking; and

WHEREAS, the FAA has determined that the Tower at 8 Terminal Drive, East Alton, IL 62024 is eligible to be listed on the National Register of Historic Places (NRHP); and

WHEREAS, the FAA has determined that the Undertaking will have an adverse effect on the Tower that is eligible for the NRHP; and

WHEREAS, on October 11, 2024, the Officer concurred with the FAA that the Tower is individually eligible for listing on the NRHP and that the Undertaking will have an adverse effect on the Tower; and

WHEREAS, the public was notified of the Undertaking and given an opportunity to comment on the adverse effect in a notice published in the *Alton Telegraph* and on the FAA's dedicated Air Traffic Facilities website (https://www.faa.gov/air_traffic/atf) on October 9, 2024 with no comments received; and

WHEREAS, on April 11, 2025, the FAA notified potential consulting parties of the adverse effect determination, and on May 12, 2025, the St. Louis Regional Airport has chosen to participate in the consultation to resolve the adverse effect; and

WHEREAS, on April 11, 2025, the FAA notified Tribal Nations of the adverse effect determination, and none have chosen to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1) and 36 CFR § 800.10(b), the FAA has notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect determination, and on April 29, 2025, the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, the FAA and the Officer agree that the Undertaking shall be implemented in accordance with the following stipulations in this Memorandum of Agreement (Agreement) in order to mitigate the adverse effects of this Undertaking to the NRHP-eligible property:

STIPULATIONS

The FAA, in coordination with the Officer, shall ensure that the following measures are carried out:

I. MITIGATION PLAN (Historic Illinois Buildings Survey [HIBS])

A. The FAA shall retain a historical contractor(s) of its choice (Contractor) who meets the Secretary of the Interior's Qualifications (36 CFR Part 61, https://www.nps.gov/history/local-law/arch_stnds_9.htm) to complete a Level II Historic Illinois Buildings Survey (HIBS) according to the measures described below.

1. The FAA will ensure that the mitigation is completed by the Contractor, as stipulated in I. Mitigation Plan.
2. The recordation must follow the HIBS guidelines established by the Officer, according to the specifications listed in Attachment A.
3. The Contractor must coordinate with the FAA prior to the initiation of the work to ensure that expectations are understood.
4. Fieldwork, in the form of a site visit, draft photography, measurements, and final photography must take place before the Project may commence.
5. Upon completion of draft photography, the Contractor shall digitally submit the images and copies of field notes to the FAA for review and comment. The FAA

will submit these materials to the Officer for review and comment.

6. Upon FAA and Officer confirmation in writing that all of the final HIBS photographs to complete HIBS recordation has been collected, the demolition of the existing Tower may commence.
7. The Contractor shall prepare and email a 95% draft of the HIBS recordation in .pdf format to the FAA for review and comment. The FAA will submit these materials to the Officer for review and comment.
8. When the FAA and the Officer accept the 95% draft submission, in writing, the Contractor shall incorporate into the recordation any comments that the FAA and Officer provide and complete the final documentation.
9. Upon completion of the final documentation, the FAA shall submit the following to the Officer:
   a. One archival clamshell of sufficient size to encapsulate the HIBS recordation.
   b. One copy of the HIBS recordation, on archival materials, according to HIBS specifications for deposit in the Abraham Lincoln Presidential Library and Museum.
   c. One digital record (download, link, flash drive, CD, or DVD) with the complete HIBS recordation for posting on the SHPO website.

II. DURATION

This Agreement shall expire two years from the data of execution of this Agreement or at such time as all of its terms are satisfied. Prior to such time, the FAA may consult with the other signatories to reconsider the terms of the Agreement and amend it in accordance with Stipulation VII AMENDMENTS below. .

III. POST-REVIEW DISCOVERIES

If potential historic properties are encountered or unanticipated effects on historic properties found during implementation of the Undertaking, the FAA shall immediately consult with the Officer and Tribes and make reasonable efforts to avoid, minimize, or mitigate adverse effects to such properties. In the event of an unanticipated encounter of human remains or burials, the FAA must immediately stop work within 100 feet of the area, notify the Coroner, Officer, and Tribes, and comply with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) and pertinent sections of the Human Remains Protection Act (20 ILCS 3440).

IV. MONITORING AND REPORTING

Each year following the execution of this Agreement until it expires or is terminated, the FAA shall provide all parties to this Agreement a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in the

CFR § 800.7. The FAA shall notify the signatories as to the course of action it will pursue.

VIII. COUNTERPARTS; FACSIMILE OR .PDF SIGNATURES

This Agreement may be executed in counterparts, each of which shall be considered an original and together shall be one and the same Agreement. A facsimile or .pdf copy of this Agreement and any signatures thereon will be considered for all purposes as an original.

IX. DISTRIBUTION OF AGREEMENT

In order to meet the requirements of Section 106, 36 CFR § 800.6(b)(1)(iv), upon the execution of this Agreement and prior to approving the Undertaking, the FAA must transmit to the ACHP the executed Agreement along with the documentation specified in Section 800.11(f).

EXECUTION of this Agreement and implementation of its terms is evidence that the FAA has taken into account the effects of this Undertaking on historic properties and afforded the Officer and the ACHP an opportunity to comment.

FAA's efforts to carry out the terms of this Agreement.

V. DISPUTE RESOLUTION

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

A. Forward all documentation relevant to the dispute, including any timely advice or comments regarding the dispute from the signatories and concurring parties and the FAA's proposed resolution, to the ACHP. The ACHP shall provide the FAA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. The FAA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FAA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the Agreement and provide them and the ACHP with a copy of such written response.

C. The FAA's responsibility to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute remain unchanged.

VI. AMENDMENTS

This Agreement may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy is signed by all of the signatories.

VII. TERMINATION

If any signatory to this Agreement determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulations VI and VII above. If within thirty (30) days an amendment cannot be reached, any signatory may terminate the Agreement upon written notification to the other signatories.

Once this Agreement is terminated, and prior to work continuing on the Undertaking, the FAA must either (a) execute a Memorandum of Agreement pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36

MEMORANDUM OF AGREEMENT AMONG
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AND THE
ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE ST. LOUIS REGIONAL AIRPORT
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT 8 TERMINAL DRIVE,
EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)

SIGNATORY

ILLINOIS DEPUTY STATE HISTORIC PRESERVATION OFFICER (OFFICER)

By: Carey L. Mayer Digitally signed by Carey L. Mayer Date: 2025.06.17 15:48:02 -05'00' Date: 6/17/2025

Carey L. Mayer, AIA
Deputy State Historic Preservation Officer
Illinois Department of Natural Resources

MEMORANDUM OF AGREEMENT AMONG
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AND THE
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EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)

SIGNATORY

FEDERAL AVIATION ADMINISTRATION

Signature: EDITH A BOWDISH Digitally signed by EDITH A BOWDISH Date: 2025.06.18 11:53:36 -05'00' Date: _____

Name: Edith Bowdish

Title: Manager, CSA ES Engineering Support Group, AJW-2C16

MEMORANDUM OF AGREEMENT AMONG
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EAST ALTON, IL 62024, ILLINOIS
(SHPO LOG # 001100824)

CONCURRING PARTY

ST. LOUIS REGIONAL AIRPORT

Signature: Danny Adams Digitally signed by Danny Adams Date: 2025.06.25 10:45:43 -05'00' Date: _____

Name: Danny Adams

Title: Airport Director

APPENDIX C | SECTION 4(F) COORDINATION

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

May 7, 2025

4112.1
ER 25/0166

Aaron Comrov
Federal Aviation Administration (FAA)
2300 East Devon Avenue, Suite 450
Des Plaines, IL 60018

RE: St. Louis Regional Airport Air Traffic Control Tower Draft DOT 303(c) Section 4(f) Evaluation, East Alton, IL

Dear Aaron Comrov,

The U.S. Department of the Interior (Department), including the National Park Service (NPS), has reviewed the draft Section 4(f) evaluation for the replacement of an Airport Traffic Control Tower (ATCT) at St. Louis Regional Airport (ALN) in East Alton, Illinois. The purpose of the Proposed Action is to replace the ALN ATCT with a modern ATCT providing for uninterrupted air traffic control services.

The project sponsor is the Federal Aviation Administration (FAA) as the lead federal agency. The draft Section 4(f) evaluation considers the effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project. Only potential effects to National Register of Historic Places (NRHP)-eligible resources were analyzed in this evaluation. No other Section 4(f) resources such as publicly owned parks, recreation areas, and wildlife and waterfowl refuges were presented in this determination.

The evaluation considered three alternatives. The No Action Alternative would not meet the purpose and need to replace the ALN ATCT and is therefore, not a feasible and prudent alternative. The Retain Existing ATCT Alternative would build a new ATCT in a different location while retaining the existing ATCT. This alternative could result in compromises to air traffic safety, would be prohibitive and inconsistent with the mission of the FAA, and is therefore not a feasible and prudent alternative. The Proposed Action Alternative (preferred alternative) would demolish the existing ATCT and replace it with a new, modern, and sustainable ATCT facility. The preferred alternative was the only alternative that met the purpose and need and could incorporate mitigation efforts to minimize overall harm to Section 4(f) resources.

Section 4(f) Determinations
The NRHP evaluation identified one historic site, the existing ATCT, as a Section 4(f) resource. No other historic or archaeological sites are located within the project area. The FAA determined that the construction of a new ATCT under the Proposed Action Alternative would have an indirect adverse effect and constructive use on the existing ATCT by obstructing its viewshed and eliminating its integrity of setting and association. They also found that removal and demolition of the existing ATCT would result in a direct, adverse effect and permanent use of the Section 4(f) resource. To mitigate impacts of the preferred alternative, the FAA consulted and developed a draft Memorandum of Agreement (MOA) with the Illinois State Historic Preservation Officer (SHPO), and other consulting parties under Section 106 of the National Historic Preservation Act (NHPA). The MOA contains mitigation requirements for the impacts to the Section 4(f) resource. The FAA found there was no feasible and prudent avoidance alternative to the use of the existing ATCT and included all possible planning to minimize harm.

Section 4(f) Comments
The NPS reviewed the draft Section 4(f) evaluation for the ATCT project at ALN and has made the following comments. The control tower is eligible for the NRHP under Criterion C (36 CFR 60.4) as it was designed by master architect I.M. Pei. It is also eligible under Criterion A for its historical representation of the construction and implementation of a FAA National Air Space. The ATCT is not nationally significant but is significant at the local and state level. No National Historic Landmarks (NHLs) are in the area. NPS concurs with the findings of the consultant and the SHPO that demolition of the control tower would be an adverse effect. The SHPO's proposed mitigation for the adverse effect is to undertake level 2 Historic Illinois Building Survey (HIBS) documentation. As determined by the Historical Architect for the NPS Midwest Region, this is an acceptable level of mitigation.

The Department's review concurs 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. The Department recommends that coordination continue with all consulting parties and the project follow the agreed upon measures outlined in the finalized Section 106 MOA.

The Department has a continuing interest in working with the FAA to ensure impacts to resources of concern are adequately addressed. For matters related to these comments, please coordinate with Hanna Daly, Regional Environmental Coordinator, NPS serving Department of Interior Regions 3, 4, and 5 (hanna_daly@nps.gov). We appreciate the opportunity to provide these comments.

Sincerely,

JOHN NELSON Digitally signed by JOHN NELSON
Date: 2025.05.07 13:09:36 -05'00'

John V. Nelson
Regional Environmental Officer

Electronic distribution: aaron.conrov@faa.gov