

FEDERAL AVIATION ADMINISTRATION



FINDING OF NO SIGNIFICANT IMPACT/ RECORD OF DECISION

for the
Proposed Airport Traffic Control Tower (ATCT) Replacement
at
Lawton-Fort Sill Regional Airport (LAW), Lawton, Oklahoma

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT
AND
RECORD OF DECISION
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT AT
LAWTON-FORT SILL REGIONAL AIRPORT (LAW), LAWTON, OKLAHOMA**

I. INTRODUCTION

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

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

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

- Air Quality – The Proposed Action would result in a short-term and temporary increase in emissions and dust (particulate matter) during construction and demolition activities. In addition, a long-term reduction in emissions from reduced energy use is expected from the new ATCT.
- Climate – The Proposed Action would result in a short-term increase in greenhouse (GHG) emissions during construction and demolition activities, and a long-term reduction in GHG emissions from reduced energy use the new ATCT.
- Farmlands – The Proposed Action is not within prime farmlands and would not involve the disturbance, conversion, or removal of any prime farmlands.

¹ On June 30, 2025, the FAA rescinded its NEPA implementation procedures in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and issued new NEPA implementing procedures in FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*. The FAA ATCT Final PEA (2023) and LAW Draft EA applied FAA Order 1050.1F and provided appropriate citations to that Order, where appropriate. There are no material changes to the analysis of environmental effects for the issuance and implementation of the FAA ATCT Final PEA and this Final EA caused by the updated FAA’s NEPA implementing procedures.

- Hazardous Materials, Solid Waste, and Pollution Prevention – The Proposed Action would result in short-term and temporary impacts during construction and use of fuels and chemicals, and short-term and temporary impacts from demolition and removal of waste or other unknown materials from the existing ATCT site.
- Land Use – The Proposed Action would not require any changes to land use as described in the airport master plan.
- Natural Resources and Energy Supply – The Proposed Action would result in long-term beneficial impacts from reductions in energy use.
- Noise – The Proposed Action would result in short-term and temporary impacts during construction and demolition activities from equipment and vehicle noise.
- Socioeconomics, Environmental Justice², and Children’s Environmental Health and Safety Risks – The proposed action would result in short-term and temporary impacts during construction and demolition from minimal increases in employment, materials, or equipment purchases.

The LAW Final EA included site-specific analyses for the five resource areas not covered by the ATCT Final PEA and FONSI/ROD; these are historic and cultural resources, visual effects, biological resources, Section 4(f) resources, and water resources.

II. PROPOSED ACTION

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

- Construction and operation of a replacement ATCT and other associated facility support features such as a parking area and security fencing.
- Extension and/or relocation of access roads and utilities to the replacement ATCT.
- Installation of modern air traffic control electronic equipment in the replacement ATCT.
- Commissioning of the replacement ATCT, cutover of air traffic services to the replacement ATCT, and decommissioning of the existing ATCT.
- Demolition and disposal of existing ATCT facilities and associated infrastructure.
- Modification and/or relocation of existing National Airspace System (NAS) facilities or airport structures necessary to enable project implementation.

III. PURPOSE AND NEED OF THE PROPOSED ACTION

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

Section 2 of the Final EA stated the purpose and need of the Proposed Action, which tiers from the purpose and need described in the ATCT Final PEA. The purpose of the Proposed Action is to replace the

² On January 21, 2025, President Trump issued Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*. Due to the rescission of prior Executive Orders regarding environmental justice and the recent action by the Council on Environmental Quality (CEQ) to rescind the NEPA implementing regulations, it is no longer a legal requirement or the policy of the federal government to conduct an environmental analysis. Any prior data gathering, analysis, or discussion regarding environmental justice is not relevant for purposes of evaluating the NEPA significance of this project, nor did it play any role in agency decision-making.

LAW ATCT with a modern ATCT providing for uninterrupted air traffic control services. The LAW ATCT is an FAA-owned ATCT eligible for replacement under the ATCT Replacement Program.

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

IV. ALTERNATIVES CONSIDERED

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

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

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

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

V. ENVIRONMENTAL CONSIDERATIONS AND MITIGATION

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

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

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

The Proposed Action is not located within close proximity to any coastal resources; therefore, analysis of this resource is not included in the EA. The Proposed Action is not anticipated to have any impacts to visual effects. Short-term construction activities could have temporary, minor impacts to biological resources and water resources. Biological resources could be impacted through contaminated runoff or the introduction of invasive species through seed transfer. Water resources could be impacted downstream through erosion, contaminated runoff, or sedimentation from the construction site. The Proposed Action would have an adverse effect on historical and cultural, and Section 4(f) resources. The Oklahoma SHPO concurred with the FAA's findings for the eligibility of the LAW ATCT and the recommendation of an adverse effect from the proposed ATCT undertaking. The Proposed Action would involve demolition of the existing LAW ATCT, thus resulting in an adverse effect on historical and cultural, and Section 4(f) resources.

In May 2025, the FAA determined a Finding of Adverse Effect for the proposed demolition of the existing LAW ATCT as the tower is eligible for listing under the National Register of Historic Places (NRHP) under Criterion A and C for its association with early national FAA guidelines for construction and implementation of a NAS and as a well-preserved example of a modern master architect-designed ATCT. Under Section 106 of the National Historic Preservation Act (NHPA), in May 2025, the FAA initiated consultation for the proposed undertaking and shared its Finding of Adverse Effect with Section 106 consulting parties including the Oklahoma SHPO, the Apache Tribe of Oklahoma, Caddo Nation of Oklahoma, Cheyenne and Arapaho Tribes, Oklahoma, Comanche Nation, Oklahoma, Delaware Tribe of Indians, Kiowa Indian Tribe of Oklahoma, Osage Nation, Quapaw Nation and Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma. The SHPO concurred in a letter with the FAA's findings; however, the SHPO also recommended a hangar (Resource 1L) on the airport property as eligible for listing. The FAA updated the evaluation and agreed to align with the SHPO's recommendation of Resource 1L as eligible for listing under the NRHP. The FAA received no responses from the potential consulting parties during the 30-day public comment period.

In coordination with the Oklahoma SHPO and Oklahoma Archeological Survey, the FAA developed a Memorandum of Agreement (MOA) to resolve the proposed undertaking's adverse effect through agreed upon mitigation activities. In August 2025, the FAA provided its Finding of Adverse Effect and the draft MOA to the Advisory Council on Historic Preservation (ACHP) and the aforementioned potential consulting parties as part of the FAA's continued consultation efforts to resolve adverse effects to the existing ATCT. On August 19, 2025, the ACHP acknowledged receipt of the draft Section 106 MOA and stated this agreement "fulfills the requirements of Section 106 of the National Historic Preservation Act and its implementing regulations." The FAA and consulting parties executed the MOA on September 11,

2025. Mitigation measures in the MOA include installation of an interpretive display and publication of a webpage highlighting the state and local significance of the ATCT.

The proposed demolition of the NRHP-eligible existing ATCT would impact and result in a permanent use of the Section 4(f) property. As such, the FAA prepared a Draft Section 4(f) evaluation and consulted with the Department of Interior (DOI) to identify measures to avoid or minimize the harm of impacts before proceeding with the project. On September 15, 2025, the FAA received concurrence from DOI that “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. Upon receiving DOI concurrence, the FAA executed the MOA and prepared a Final Section 4(f) evaluation to include the established mitigation measures.

Based on the information assessed in the Final Section 4(f) evaluation, 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.

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

VI. FINDING

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

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

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

Edith A. Bowdish
Infrastructure Engineering Group Manager
Central Service Area

RIGHT OF APPEAL

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