Airport Traffic Control Tower (ATCT) Replacement Program
Chicago Rockford International Airport (RFD) ATCT
Draft Tiered Environmental Assessment (EA)

Rockford, Illinois
March 2026

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ACRONYMS AND ABBREVIATIONS

AFTIL ..... Airport Facilities Terminal Integration Laboratory
AGL ..... Above Ground Level
APE..... Area of Potential Effects
ATCT..... Airport Traffic Control Tower
BMP ..... Best Management Practice
CFR..... Code of Federal Regulations
DOT..... Department of Transportation
EA ..... Environmental Assessment
EPA..... U.S. Environmental Protection Agency
ESA..... Endangered Species Act
FAA..... Federal Aviation Administration
FEMA..... Federal Emergency Management Agency
FONSI..... Finding of No Significant Impact
IAS..... Illinois Archeological Survey
IIJA..... Infrastructure Investment and Jobs Act
NAS ..... National Airspace System
n.d. ..... No Date
NEPA ..... National Environmental Policy Act
NPS..... National Park Service
NRHP..... National Register of Historic Places
NRI ..... Nationwide Rivers Inventory
PEA..... Programmatic Environmental Assessment
P.L. ..... Public Law
RFD..... Chicago Rockford International Airport
ROD..... Record of Decision
SHPO..... State Historic Preservation Office
Sqft ..... Square Foot
SWPPP ..... Stormwater Pollution Prevention Plan
TRACON ..... Terminal Radar Approach Control Facility
U.S. ..... United States
U.S.C. ..... U.S. Code
USFWS ..... U.S. Fish and Wildlife Service

SECTION 1 | INTRODUCTION

1.1 OVERVIEW

The Federal Aviation Administration (FAA) is proposing to replace the existing Airport Traffic Control Tower (ATCT) at Chicago Rockford International Airport (RFD) in Rockford, 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, 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 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; FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*;[2] the Fiscal Responsibility Act of 2023 (P.L. 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 Environmental Assessment (EA) for RFD tiers[3] from the ATCT Final PEA and follows the FAA's updated Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, to evaluate the existing environment and analyze the reasonably foreseeable environmental consequences of the proposed alternatives at a site-specific level through the framework established by the ATCT Final PEA and FONSI/ROD (FAA ATCT Final PEA, 2023).

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[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 July 3, 2025. Projects that commence after July 3, 2025 are required to comply with FAA Order 1050.1G, while those projects already underway by that date may follow FAA Order 1050.1F. While the original PEA was completed under FAA Order 1050.1F, tiered EAs will be completed under FAA Order 1050.1G. This change between Orders encompasses and relies upon the Fiscal Responsibility Act of 2023; Executive Order 14173, Ending Illegal Discrimination and Restoring Merit Based Opportunity; Executive Order 14154, Unleashing American Energy; and the Supreme Court decision in Seven County Infrastructure Coalition v. Eagle County, 605 U.S. 168 (2025). As a result, this tiered EA does not include an analysis of environmental justice, climate change, or cumulative impacts.

[3] Tiering in accordance with NEPA is defined in FAA Order 1050.1G, Section 3-1.

1.2 PROPOSED ACTION

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

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

The estimated construction start date to replace the ATCT is in late 2026.

1.3 BACKGROUND

1.3.1 Airport Information

RFD is located approximately 68 miles northwest of Chicago, Illinois. The land that RFD is located on operated as Camp Grant, a United States (U.S.) Army facility, between 1917 and 1946. Camp Grant was operated as a training base and prisoner of war camp during World Wars I and II. In 1946, the Greater Rockford Airport Authority was created and now continues to grow as a commercial service and general aviation airport (RFD, 2025a).

RFD comprises two runways that are 10,000 feet and 8,200 feet in length. RFD offers access to aviation maintenance repair facilities and supports a large cargo shipping industry. In 2024, the airport supported 46,910 operations in total (FAA, n.d. (b)). The area surrounding RFD consists of industrial land use to the east of the airport, the Rock River to the north and west of the airport, and agricultural land use to the south of the airport.

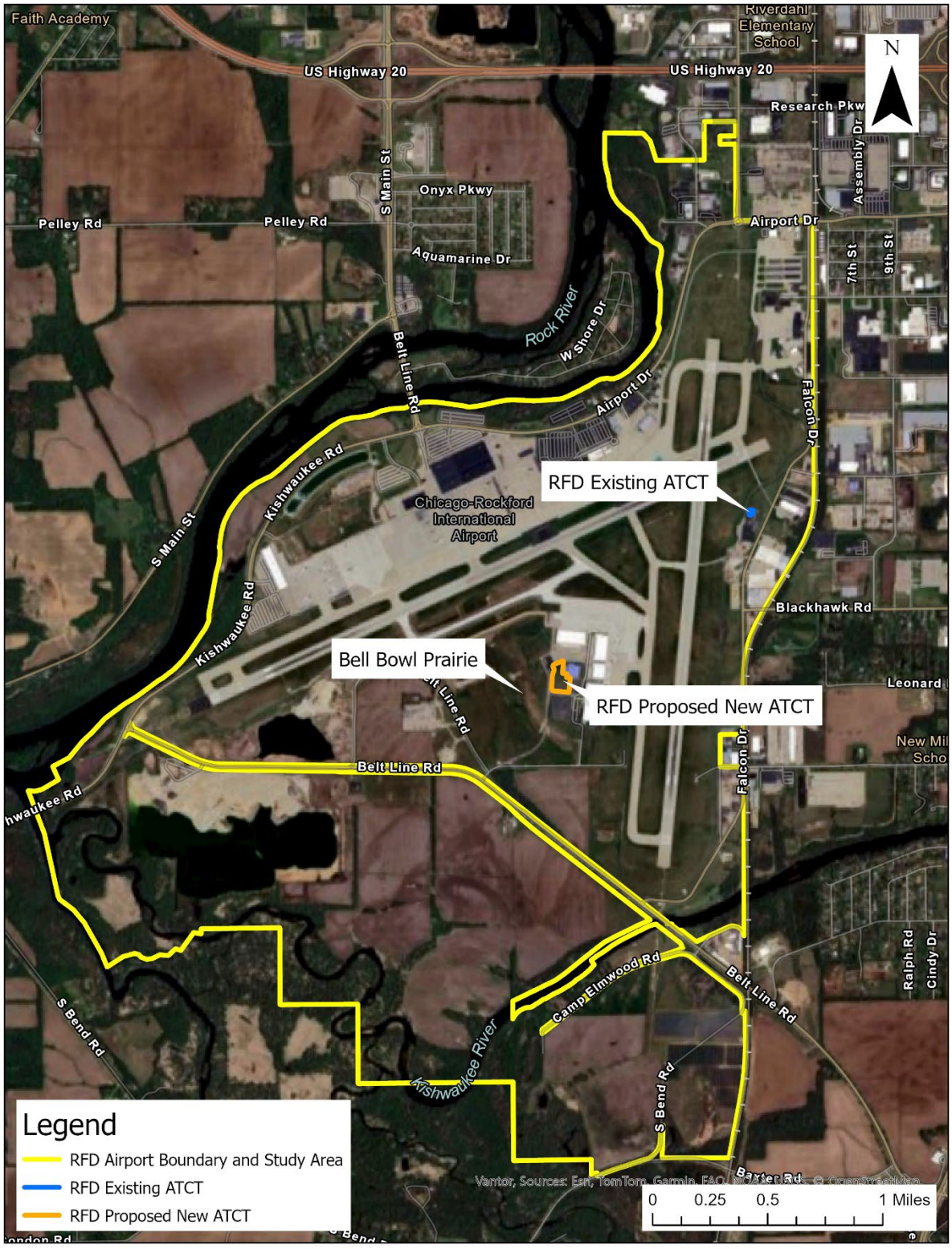

Figure 1-1. Aerial Image of Airport Property

1.3.2 Existing Airport Traffic Control Tower Information

Commissioned in 1958, the existing RFD ATCT is a non-standard design located at latitude 42° 11' 55.8" N, longitude 89° 05' 10.1" W. The existing ATCT stands with a cab floor height at approximately 43 feet above ground level (AGL) with a four-sided cab area of 350 square feet (sqft) (FAA, 2025a). The RFD ATCT is a combined ATCT/TRACON that supports space for two air traffic controllers and five TRACON staff. The ATCT's base building contains the TRACON, bathrooms, lockers, an equipment room, and a gym. Outside of the base building is a patio with a table, grill, and lounge area for staff. Asbestos remediation has been completed throughout the base building; however, signs indicate that asbestos-containing materials have been documented as still present within the building. Stairs are located at the far end of the base building hallway, away from the main entrance, to access the ATCT (FAA, 2025b).

Figure 1-2. Photo of Existing ATCT at RFD

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 RFD ATCT.

2.1 PURPOSE

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

The Proposed Action at RFD 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 and contractor staff, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to a sustainable design including energy efficient features, windows, and heating/ventilation systems while meeting applicable FAA requirements.

2.2 NEED

The FAA recognizes the need to provide continual air traffic control services at RFD. The existing RFD ATCT is beyond its design life and does not meet current code requirements, does not have the ability to accommodate upgrades to the latest air traffic control technologies, lacks the personnel space requirements and modern amenities, and may have physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating/ventilation systems, 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 of Airport Traffic Control Towers (ATCTs),* the FAA adheres to a siting process to provide the lowest cost ATCT that meets all siting criteria for the establishment or replacement of an ATCT facility (FAA, 2025c). This siting process takes into consideration multiple technical criteria, as prescribed in Order 6480.4C.

Representatives from the FAA and RFD conducted siting for this project working with the Airport Facilities Terminal Integration Laboratory (AFTIL) in Atlantic City, New Jersey. The AFTIL developed 3-dimensional airport models and simulations for the siting team to visualize line-of-sight from any position on the airport (FAA, 2025c). A Safety Risk Management Panel met in August 2025 and recommended the Proposed Action site and proposed new ATCT size with no hazards identified (FAA, n.d. (b)).

This tiered EA evaluates the selected site alternative (as determined by the ATCT siting process) and no build alternative for the proposed replacement of the RFD ATCT. **Error! Reference source not found.** provides an aerial image of the proposed new replacement tower at the selected site alternative.

3.1 ALTERNATIVE 1: PROPOSED ACTION (PREFERRED ALTERNATIVE)

The Proposed Action, as determined by the siting process governed by FAA Order 6480.4C, is construction and operation of a replacement ATCT at a site referred to in the siting report as Site 3a. Site 3a, hereinafter referred to as the proposed new ATCT site (latitude 42° 11' 27.25" N, longitude 89° 05' 52.55" W) is located approximately 0.82 miles southwest of the existing ATCT. The proposed new ATCT site is approximately 1.67 acres of a large, unoccupied grassy area. The proposed new ATCT site is bordered to the north, east, and south by aircraft hangars, and to the west by an open prairie area. The AFTIL meeting determined Site 3a to be most technically feasible based on criteria referenced in Chapter 2 of the ATCT Final PEA (FAA ATCT Final PEA, 2023).

The proposed new ATCT would be 190 feet AGL at the cab floor level and 225 feet AGL at the top of the tower. The proposed new ATCT provides an unobstructed view of all movement areas on the airfield and improved operating space with a proposed 650 sqft cab. This proposed design would allow for a safe operating environment and include technological and energy-efficient upgrades. A 19,500 sqft base building would be constructed to replace the existing base building and TRACON space. Existing roads would be used for construction and maintenance activities via Cessna Drive.

The Proposed Action would involve demolition of the existing ATCT and base building. Utilities that are tied to the existing ATCT would be disconnected or abandoned. Best practices for erosion and sedimentation would be implemented during the demolition process to avoid impacts to surrounding natural resources. Construction and demolition waste would be handled appropriately per any applicable state and federal regulations.

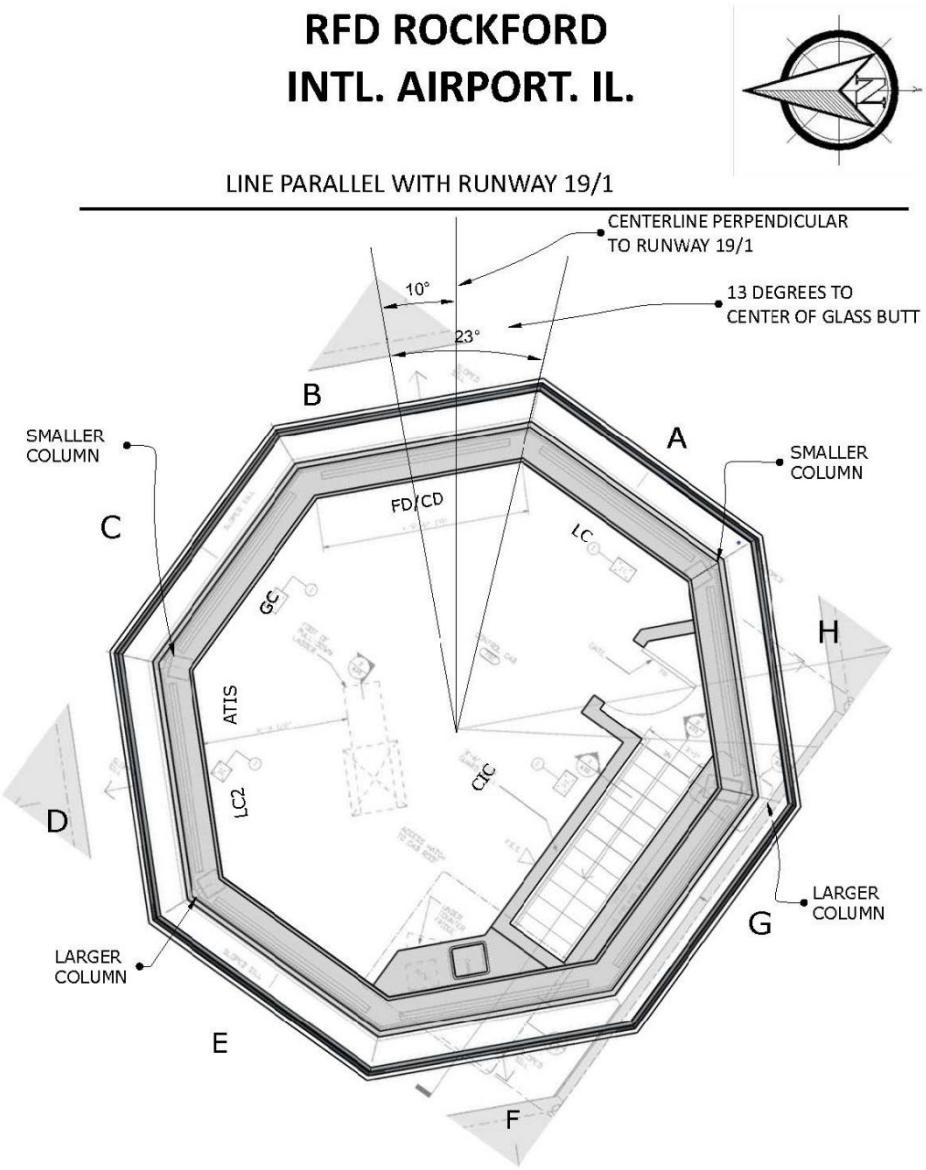

Figure 3-1. Proposed Layout of Replacement ATCT

3.2 ALTERNATIVE 2: NO ACTION

A No Action Alternative is required to be included in this EA consistent with FAA Order 1050.1G. The No Action Alternative is defined as maintaining the status quo (baseline conditions) without federal agency involvement. 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 reasonably foreseeable if Alternative 1 (Proposed Action) were not implemented.

SECTION 4 | AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section provides documentation of existing environmental resource conditions or affected environment at RFD and surrounding areas. Figure 1-1 identifies the study area for this Draft EA as the Area of Operations for RFD. In addition, the smaller area encompassing the Proposed Action—the existing RFD ATCT and proposed new ATCT site—is described as the project area. This section also analyzes the reasonably foreseeable 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 reasonably foreseeable 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 reasonably foreseeable 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 REVIEWED BY THE ATCT FINAL PEA

The ATCT Final PEA and FONSI/ROD identified eight 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 reasonably foreseeable.

☒ Air Quality

☒ Climate[4]

☒ Farmlands

☒ Hazardous Materials, Solid Waste, and Pollution Prevention

☒ Land Use

☒ Natural Resources and Energy Supply

☒ Noise

☒ Socioeconomics, Environmental Justice,[5] and Children's Environmental Health and Safety Risks

[4] See footnote 2.

[5] 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 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

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

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

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

Regulatory requirements for these resource categories can be found 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[6] or threatened[7]), and candidate[8] species designated by the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service, or a State. Sensitive habitats described in this section include those

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.

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

[7] 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))

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

areas designated by the USFWS as critical habitat[9] protected by the Endangered Species Act of 1973 (ESA; 16 U.S.C. Chapter 35 § 1531 et seq.).

4.2.1.1 Affected Environment

Vegetation

RFD is on the border of the U.S. Environmental Protection Agency's (EPA) Level III Ecoregions 53 (Southeastern Wisconsin Till Plains) and 54 (Central Corn Belt Plains) (EPA, 2013). The airport is surrounded by property used for aviation, industrial, and agricultural purposes (FAA, 2025b). The midfield area at RFD contains approximately 10 acres of protected prairie habitat, known as Bell Bowl Prairie (FAA, 2022). This prairie is located just west of the proposed new ATCT site. The existing ATCT is located on landscaped grounds with rose bushes (*Rosaceae spp.*), a crabapple tree (*Malus spp.*), panicled hydrangea (*Hydrangea paniculata*), a spruce tree (*Picea spp.*), English yew (*Taxus baccata*), and bentgrass (*Agrostis capillaris*). Red daylilies (*Hemerocallis spp.*) and German garlic (*Allium senescens*) are planted along both sides of the sidewalk entrance to the ATCT. Vegetation at the proposed new ATCT site includes bird's-foot-trefoil (*Lotus conriculatus*), red clover (*Trifolium pratense*), spotted knapweed (*Centaurea stoebe*), field bindweed (*Convolvulus arvensis*), chicory (*Asteraceae spp.*), and hilo grass (*Paspalum coniugatum*). Grassy vegetation at both sites is consistently mowed (FAA, 2025b).

Wildlife and Fish

Air traffic controllers have historically observed red foxes (*vulpus vulpus*), hawks (*Accipitridae spp.*), bald eagles (*Haliaeetus leucocephalus*), seagulls (*Laridae spp.*), mice (*Mus spp.*), and other rodents (*Rodentia spp.*) on the airfield from the ATCT cab (FAA, 2025b). Other wildlife species observed at the airport between June 2024 and July 2025 includes turkey vulture (*Cathartes aura*), chimney swift (*Chaetura pelagica*), bank swallow (*Riparia riparia*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), Canada geese (*Branta canadensis*), killdeer (*Charadrius vociferus*), red-tailed hawk (*Buteo jamaicensis*), mourning dove (*Zenaida macroura*), eastern meadowlark (*Sturnella magna*), harrier hawk (*Circinae spp.*), pigeon (*Columba livia*), crow (*Corvus spp.*), sandhill crane (*Grus canadensis*), mallard (*Anas platyrhynchos*), coyote (*Canis latrans*), badger (*Taxidea taxus*), raccoon (*Procyon lotor*), and Virginia opossum (*Didelphis virginiana*) (RFD, 2025b). Wildlife strike reports at RFD between June 2024 and July 2025 indicate reported strikes with eastern meadowlark, American kestrel (*Falco sparverius*), chimney swift, mourning dove, little brown bat (*Myotis lucifungus*), and bank swallow (RFD, 2025c).

[9] 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))

Special Status Species

During the July 2025 site visit, airport personnel indicated that protected species have been observed in and around the airport. These species include snowy owl (*Bubo scandiacus*), Indiana bat (*Myotis sodalist*), wolverine (*Gulo gulo*), American white pelicans (*Pelecanus erythrorhynchos*), and bald eagles that nest along the river.

A search of special status species at the county level using the USFWS Environmental Conservation Online System and a more focused search of the study area using the USFWS Information for Planning and Consultation (IPaC) identified nine species also listed at the county level, as shown in Table 4-1. The full USFWS species lists are provided in Appendix A.

Table 4-1. Federally Listed Species

Common Name	Scientific Name	County Listed Status	Study Area Status
Western regal fritillary	*Argynnis idalia occidentalis*	Proposed Threatened	Proposed Threatened
Rusty patched bumble bee	*Bombus affinis*	Endangered	Endangered
Monarch butterfly	*Danaus plexippus*	Proposed Threatened	Proposed Threatened
Prairie bush-clover	*Lespedeza leptostachya*	Threatened	Threatened
Little brown bat	*Myotis lucifungus*	Under Review	Not Listed
Northern long-eared bat	*Myotis septentrionalis*	Endangered	Endangered
Indiana bat	*Myotis sodalis*	Endangered	Endangered
Tricolored bat	*Perimyotis subflavus*	Proposed Endangered	Not Listed
Eastern prairie fringed Orchid	*Platanthera leucophaera*	Threatened	Threatened
Hine's emerald dragonfly	*Somatochlora hineana*	Endangered	Endangered

Source: (USFWS, 2025a; USFWS, 2025b)

Proposed critical habitat is present within the study area for the rusty patched bumble bee (USFWS, 2025a). In 2022, following one alleged sighting of the rusty-patched bumble bee (*Bombus affinis*) the FAA prepared a biological assessment hat surveyed the Bell Prairie habitat within the midfield area at RFD. The biological assessment detailed the evaluation of suitability of habitat for six species: the Indiana bat, northern long-eared bat (*Myotis septentrionalis*), Hine's emerald dragonfly (*Somatochlora hineana*), eastern prairie orchid (*Platanthera leucophaea*), prairie bush clover, and rusty patched bumble bee. The biological assessment identified the presence of suitable habitat and multiple designated "high potential zones" (HPZs) for rusty patched bumble bees in the Bell Bowl Prairie area at the airport (FAA, 2022). The proposed new ATCT and existing ATCT sites are located approximately 0.06 miles east and 0.90 miles northeast of the Bell Bowl Prairie habitat, respectively. Additionally, prime habitat for the prairie bush clover (*Lespedeza leptostachya*) was identified within the Bell Bowl Prairie area at RFD. No prairie bush clover was observed during the assessment. Suitable habitat for the Indiana bat, northern long-eared bat, or Hine's emerald dragonfly were not identified within the Bell Bowl Prairie area (FAA, 2022).

Eastern prairie fringed orchids have the potential for presence within the study area and typically prefer moist soil near wetland habitat (USFWS, 2025c). Given the continually mowed vegetation and lack of wetland soil conditions within the project area, it is not likely that the eastern prairie fringed orchid is established at either the existing or proposed new

ATCT sites. No eastern prairie fringed orchid were observed within the project area during the 2025 site visit (FAA, 2025b).

The little brown bat, northern long-eared bat, Indiana bat, and tricolored bat (*Perimyotis subflavus*) are listed as potentially present in Winnebago County and little brown and Indiana bats have been observed at RFD (USFWS, 2025b; RFD, 2025c). All four bat species hibernate in caves or mines during the winter. The little brown bat is typically found roosting in trees and artificial structures in the summer and foraging around bodies of water (USFWS, 2025d). The northern long-eared bat is typically found roosting underneath peeling bark and within tree crevices during the summer and foraging in forested areas (USFWS, 2025e). The Indiana bat is typically found roosting in forested areas near wetland habitats and foraging in similar forested habitat (USFWS, 2025f). The tricolored bat is typically found roosting in leaf clusters and artificial structures and forages along forest edges and waterways (USFWS, 2025g). No critical habitat for these bat species is located within the study area (USFWS, 2025a). Wetland areas surround the study area which attract insects and could provide foraging habitat for bat species. Although no roosting habitat is present at the proposed new ATCT site, the existing ATCT and spruce tree present potential roosting habitat for bats within the project area. During the site visit, airport staff noted having seen bats present at RFD so it is likely that bats are transiently present within the study area (FAA, 2025b). Given the disturbed nature of the land, lack of habitat, and consistent mowing at the proposed new ATCT site, it is unlikely that bats are permanently present within the project area.

Adult monarch butterflies (*Danaus plexippus*) feed on the nectar of flowering plants and their larvae require milkweed (*Asclepias spp.*) plants to develop. Monarch butterflies only reproduce where milkweed plants are located (USDA, 2025). The species could use habitat within the study area for resting or feeding in areas where flowering plants are present, including the Bell Bowl Prairie area. No milkweed plants were identified during the July 2025 site visit; thus, it is unlikely that monarch butterflies are present within the project area (FAA, 2025b).

Western regal fritillary (*Speyeria idalia*) is a butterfly species found in native grassland habitat that requires flowering species for feeding. Larval growth is dependent on violet species (*Viola spp.*) (USFWS, 2024a). The Bell Bowl Prairie habitat area within the study could support this species; however, no prairie habitat is located within the project area.

Hine's Emerald dragonfly (*Somatochlora hineana*) are found primarily around aquatic, wetland environments for foraging and larval development (USFWS, 2025h). While no wetland area is located within the project area, the riverine and wetland areas surrounding the study area could provide habitat for this species.

Migratory Birds

Illinois is located within the Mississippi Flyway for migratory birds (USFWS, 2023). The USFWS lists 15 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*), bobolink (*Dolichonyx oryzivorus*), chimney swift (*Chaetura pelagica*), grasshopper sparrow (*Ammodramus savannarum perpallidus*), henslow's sparrow (*Centronyx henslowii*), lesser yellowlegs (*Tringa flavipes*), pectoral sandpiper (*Calidris melanotos*), prairie loggerhead

shrike (*Lanius ludovicianus excubitorides*), prothonotary warbler (*Protonotaria citrea*), red-headed woodpecker (*Melanerpes erythrocephalus*), semipalmated sandpiper (*Calidris pusilla*), upland sandpiper (*Bartramia longicauda*), and wood thrush (*Hylocichla mustelina*) (USFWS, 2025a).

Within the study area, the probability of presence for the black-billed cuckoo, bobolink, chimney swift, grasshopper sparrow, henslow's sparrow, prothonotary warbler, red-headed woodpecker, semipalmated sandpiper, and wood thrush is likely during the summer. The probability of presence for American golden-plover, lesser yellowlegs, pectoral sandpiper, and prairie loggerhead shrike is likely during the spring. The probability of presence for the upland sandpiper is likely during the spring and summer. The probability of presence for the bald eagle is likely all year.

The bald eagle is not a Bird of Conservation Concern in the study area; however, this species 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; bald eagle management guidelines would apply if any nests were observed in the study area (USFWS, 2024b). No bald eagle nests were observed during the site visit; however, air traffic controllers mentioned bald eagles nesting near the river and observing bald eagles around the airport and within the study area.

Invasive Species

The Center for Invasive Species and Ecosystem Health at the University of Georgia lists 45 vegetative species as invasive in the state of Illinois (University of Georgia, 2016). None of the listed invasive species were observed within the project area during the 2025 site visit.

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 1050.1G, Appendix A (FAA, 2025d).

Alternative 1: Proposed Action

Under the Proposed Action, the proposed new ATCT would be constructed on a previously cleared portion of the study area. This site consists of mowed grass adjacent to an existing parking lot. No tree removal is expected during construction of the proposed new ATCT.

None of the vegetation identified during the July 2025 site visit were determined to be protected species and no animal species were observed in the trees. Suitable roosting trees for the northern long-eared and Indiana bats are typically defined as trees within 1,000 feet of densely forested areas. Both the existing and proposed new ATCT sites are not located near densely forested areas (USFWS, n.d. (a); USFWS, n.d. (b)). The little brown bat and tricolored bat prefer to roost in tall deciduous hardwood trees, unlike the spruce and crabapple trees at the existing ATCT site (USFWS, 2025d; USFWS, 2025g). Given the lack of preferred habitat and the distance of these sites to forested habitat and foraging resources, impacts to any existing or potential roosting habitat for the 'under review' little brown bat and the endangered northern long-eared bat, endangered Indiana bat, and proposed-endangered tricolored bat species are not expected.

The western regal fritillary and monarch butterflies could likely use the Bell Bowl Prairie portion of the study area as habitat. The flowering plant surrounding the existing ATCT could also provide a nectar source for these insects. Based on the lack of violet species and overall number of flowering species at the project area, the Proposed Action is not likely to have an effect on the western regal fritillary. Based on the lack of milkweed species within the study area, the Proposed Action is not likely to have an effect on the monarch butterfly.

While habitats for prairie bush clover and the eastern prairie fringed orchid is present within the study area, these species were not observed within the project area. Prime habitat for these species is located within the Bell Bowl Prairie and closer to the wetland areas respectively. Given the lack of these habitats within the project area, the Proposed Action is not likely to impact these species.

There is no wetland habitat within or around the project area, thus it is unlikely that the Hine's emerald dragonfly would be present. Therefore, the Proposed Action is not likely to have an effect on this dragonfly species.

Critical habitat for the rusty patched bumble bee exists within the study area in the Bell Bowl Prairie and the species could forage at landscaped floral resources located at the existing ATCT site. As the prime habitat for the rusty-patched bumble bee is constrained to the nearby Bell Bowl Prairie, which is not included in the project area, it is unlikely that removal of vegetation at the existing and proposed new ATCT sites would have an impact on this species. The Proposed Action is not likely to impact the rusty patched bumble bee.

The increase of human foot traffic, vehicle traffic, and heavy equipment used during construction and demolition activities could introduce noxious weeds and invasive plant species to the existing and proposed new ATCT sites. Since these areas are already vulnerable to vehicle and pedestrian traffic with the potential to introduce these species, impacts are not expected to be significant.

There are no impacts to biological resources expected 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 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 waterbodies 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.

Vehicle and equipment cleaning should occur prior to accessing construction and demolition sites to reduce potential introduction and spread of noxious weeds.

In order to maintain native species to the RFD area throughout the process of constructing the proposed new ATCT and demolishing the existing ATCT, landscaping activities would be conducted only with native species to Winnebago County.

4.2.2 Historical, Architectural, Archeological, and Cultural Resources

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

4.2.2.1 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. Because all actions with the potential to affect historic and cultural resources occur within the project area, the APE is defined as the area shown on Figure 4-1.

The existing ATCT on the property, commissioned in 1958, is a non-standard tower type. The RFD non-standard ATCT design is separate from the seven historic age, standard design types for ATCTs used by the FAA since the mid-1960s. The date of construction for non-standard ATCTs covers a broad range, with some having been constructed prior to the formation of the FAA in 1958, while others were constructed simultaneously with the FAA's implementation of its standard design program. Unlike standard design towers, non-standard towers are not characterized by a unifying architectural style, layout, materials, or overall design. The design of the non-standard towers, including height, and the presence or lack of a base building, varies widely and is reflective of the individual needs of the airport it serves (FAA, 2021).

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

Booz Allen Hamilton prepared a report, *Greater Rockford International Airport Traffic Control Tower Historic Resources Survey, Winnebago County, Illinois*, evaluating the eligibility of the existing ATCT and eight other historic-age resources on RFD airport property for the National Register of Historic Places (NRHP). This report recommended the: (1) existing ATCT as not individually eligible for the NRHP; and (2) remaining surveyed historic age resources within the APE as not eligible for the NRHP under Criteria A, B, C, or D. Due to previous ground disturbance within the project area (area of disturbance), no archaeological work was recommended.

RFD was historically the site of Camp Grant and vestiges of its operation in the area of the ATCT have since been removed by prior development and earthmoving activities (RFD, 2025a). No National Historic Landmarks, NRHP-listed, or NRHP-eligible properties were identified within the study area on the National Park Service's (NPS) NRHP Database and Illinois's Historic and Architectural Resources Geographic Information System. A total of 15 previous cultural investigations, and 24 archaeological sites were recorded within the study area. A total of 2 Illinois Archaeological Survey (IAS) Mounds, and no IAS Cemeteries were identified within the study area (Ilinois State Museum, 2025; National Park Service, 2025).

4.2.2.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for historical, architectural, archaeological, and cultural resource impacts can be found in the ATCT Final PEA (FAA ATCT Final PEA, 2023) and FAA Order FAA Order 1050.1G, Appendix A (FAA, 2025d).

Alternative 1: Proposed Action

As discussed in Section 4.2.2.1, Booz Allen prepared a report recommending the (1) existing ATCT as not individually eligible for the NRHP; (2) remaining surveyed historic age resources within the APE as not eligible for the NRHP under Criteria A, B, C, or D. Due to previous ground disturbance within the project area (area of disturbance), no archaeological work was recommended (Booz Allen Hamilton, 2025).

The existing ATCT is not considered eligible for the NRHP, and therefore, the demolition of the property would not 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.

Concurrently with the Draft EA public notice, the FAA initiated the Section 106 consultation under the National Historic Preservation Act with the Illinois State Historic Preservation Office (SHPO) through notification of the FAA's Finding of No Historic Properties Affected on March 24, 2026 (see Appendix B). The FAA also initiated Section 106 consultation with federally recognized Tribes with known interests or affiliations within the project area and notified them of the FAA's findings on March 24, 2026. The following tribes were consulted: Citizen Potawatomi Nation, Forest County Potawatomi Community, Wisconsin, Hannahville Indian Community, Michigan, Ho-Chunk Nation of Wisconsin, Kickapoo Tribe of Oklahoma, Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians of Michigan, Menominee Indian Tribe of Wisconsin, and the Miami Tribe of Oklahoma. On March 24, 2026, the FAA initiated Section 106 consultation with RFD and the Rockford Historical Society.

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 historical, architectural, archaeological, and cultural resources would occur.

4.2.2.3 Unanticipated Discovery

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

4.2.3 Department of Transportation Act, Section 4(f)

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

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

4.2.3.1 Affected Environment

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

There are two Section 4(f) resources near the airport. Pinetree Park is a public park located along the Rock River approximately 1.13 miles northwest of the proposed new ATCT site. Kilbuck Bluffs Forest Preserve is a public nature preserve located approximately 1.5 miles south of the proposed new ATCT site, partially within the southern boundary of the study area. No additional Section 4(f) resources are mapped within or around the study area per the Bureau of Land Management (BLM, 2025).

4.2.3.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for Section 4(f) resource impacts can be found in the ATCT Final PEA (FAA ATCT Final PEA, 2023) and FAA Order 1050.1G, Appendix A (FAA, 2025d).

Alternative 1: Proposed Action

The Proposed Action would be limited to the project area and therefore would avoid ground disturbance at both Section 4(f) resources. Any temporary increase in construction traffic to complete the Proposed Action would not affect recreational uses of Pinetree Park or Kilbuck Bluffs Forest Preserve, as the nearest public recreational areas located more than 1 mile from

the project area and access to the Section 4(f) resources differs from access to the existing and proposed new ATCT sites. These recreational areas would remain unchanged throughout the existing ATCT demolition activities and construction of the new ATCT. Any noise or visual impacts from the Proposed Action would not alter the recreational enjoyment of these resources. The Proposed Action would have no impact on DOT Section 4(f) resources

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 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, 2020c).

4.2.4.1 Affected Environment

The proposed new ATCT site is located approximately 0.82 miles southwest of the existing ATCT. As such, the proposed new ATCT is within the same viewshed of the existing ATCT and the remainder of the airport operational area. The land surrounding the study area is zoned as 'medium industrial,' 'light industrial,' and 'aviation industrial' (City of Rockford, 2024). There are no visual receptors within the study area, as the study area is the airport property which includes land used for aviation operations. The nearest sensitive receptors are residential areas adjacent to the study area including Winnebago Court (approximately 0.32 miles east of the study area), Arthur L Johnson Subdivision which is a residentially zoned area (approximately 0.40 miles east of the study area), and an unnamed residential area approximately 0.42 miles southeast of the study area just south of the Kishwaukee River along Will James Road. These neighborhoods could be considered sensitive receptors to visual changes from the Proposed Action. Light emissions are a highly subjective resource due to the difference in perception and value that a user associated with the specific feature surrounding landscape.

Light Emission

The existing RFD ATCT operates 24 hours per day with lighting controlled by air traffic controllers. Lighting at the existing ATCT includes safety indicator lights and security lights for entrances and parking. The proposed new ATCT would be adjacent to lighted structures and hangars. There is currently no lighting infrastructure at the proposed new ATCT site.

Wildlife, especially nocturnal species, may be sensitive to nighttime light sources which may disrupt migratory or breeding cycles. As mentioned in Section 4.2.1, the light sensitive little brown bat, northern long-eared bat, tricolored bat, and Indiana bat are species identified as potentially present around RFD.

Visual Resources and Visual Character

Visual resources around the proposed new ATCT site are consistent with those around the existing ATCT at RFD. The existing and proposed new ATCT sites are located on airport property, which is zoned as 'medium industrial' with adjacent properties zoned as 'light industrial' and 'airport industrial' (City of Rockford, 2024). The nearest residentially-zoned area is the Arthur L. Johnson subdivision, located approximately 0.40 miles east of the study area. This subdivision would be considered the nearest non-airport facility, visual resource to the study area. Visual resources within the study area surrounding the existing and proposed new ATCT sites include airport hangars, runways, and other industrial properties supporting aircraft operations.

4.2.4.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for visual resource impacts can be found in the ATCT Final PEA (FAA ATCT Final PEA, 2023) and FAA Order 1050.1G, Appendix A (FAA, 2025d).

Alternative 1: Proposed Action

The Proposed Action would involve construction of the proposed new ATCT on existing paved and unimproved land approximately 0.82 miles southwest of the existing ATCT. The proposed new ATCT would be approximately 147 feet taller than the existing ATCT and would involve similar operational and security lighting. Once the existing ATCT is demolished, there would be no permanent increase in light emissions within the study area. While the nearest residential area is approximately 0.40 miles east from the study area, it is located approximately 0.87 miles east of the proposed new ATCT site. As the nearest residential area is approximately 0.87 miles from the proposed new ATCT site, visual and lighting concerns are not anticipated. Although visual receptors, such as neighborhoods and subdivisions, may notice a change in the location of the ATCT after the Proposed Action is completed, the proposed new ATCT would remain within the airport operational area and would therefore not impose an impact to the overall viewshed.

Changes to the ATCT height and removal of the existing ATCT would not affect or obstruct visually important resources. Although the proposed new ATCT would be 147 feet taller than the existing RFD ATCT, it would not contrast with the area's visual character upon completion due to the study area being an active airport. The Proposed Action would have no impact on visual resources.

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 effects would occur.

4.2.5 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.

4.2.5.1 Affected Environment

Wetlands

RFD encompasses an area that includes wetlands associated with the Rock River to the north and the Kishwaukee River to the south. The wetlands surrounding the Rock and Kishwaukee Rivers are primarily freshwater forested/shrub wetlands and freshwater emergent wetlands (see Figure 4-2). One additional man-made wetland feature within the study area is an approximately 24.46-acre pond, located 0.78 miles west of the proposed new ATCT site (USFWS, 2025i). The nearest wetland area to the existing ATCT is a freshwater forested/shrub wetland located approximately 0.65 miles northwest. Although there are wetlands within the study area, there are no wetland features located within the project area.

Floodplains

The majority of the study area is located within an area of minimal flood risk. The southernmost area of the study area is located within flood zone AE which represents a 100-year floodplain, or a 1% annual chance of flooding. Along the Kishwaukee and Rock Rivers, the floodplain is mapped as a regulatory floodway, which is maintained to accommodate floodwater. Some small areas along the perimeter of the 100-year floodplain to the north and south of RFD are mapped as 500-year floodplain (FEMA, 2025). Neither the existing ATCT site nor the proposed new ATCT site are located within any Federal Emergency Management Agency (FEMA) designated floodplains. The proposed new ATCT site is located approximately 450 feet east of the 100- and 500-year floodplain. The existing ATCT site is located approximately 0.57 miles southeast from the Rock River's 100-year floodplain.

Surface Water

Surface water features within the study area include a retention pond approximately 0.78 miles west of the proposed new ATCT site, a stormwater retention pond approximately 1.0 miles northwest of the proposed ATCT site, and the Kishwaukee River approximately 0.83 miles south of the proposed ATCT site (see Figure 4-3).

Stormwater within the study area flows through 18 drainage basins that either flow south to the Kishwaukee River or north to the Rock River. The existing ATCT is located within drainage basin 13 and the proposed new ATCT site is located within drainage basin 11. Stormwater from drainage basins 11 and 13 discharges to culverts along Beltline Road at outfalls 11 and 13 respectively. Stormwater from these outfalls ultimately reaches the Kishwaukee River (RFD, 2025d).

Groundwater

The study area does not overlay any sole source aquifers (EPA, 2023). The study area is located over the Cambrian-Ordovician principal aquifer system which supplies water to 26 million people across seven states (USGS, 2025a; USGS, 2017). No active groundwater well sites are mapped around RFD; however, one groundwater well along the north boundary of the study area was sampled occasionally between 1968 and 1985 and returned to a groundwater range of 20 to 65 feet bgs (USGS, 2025b).

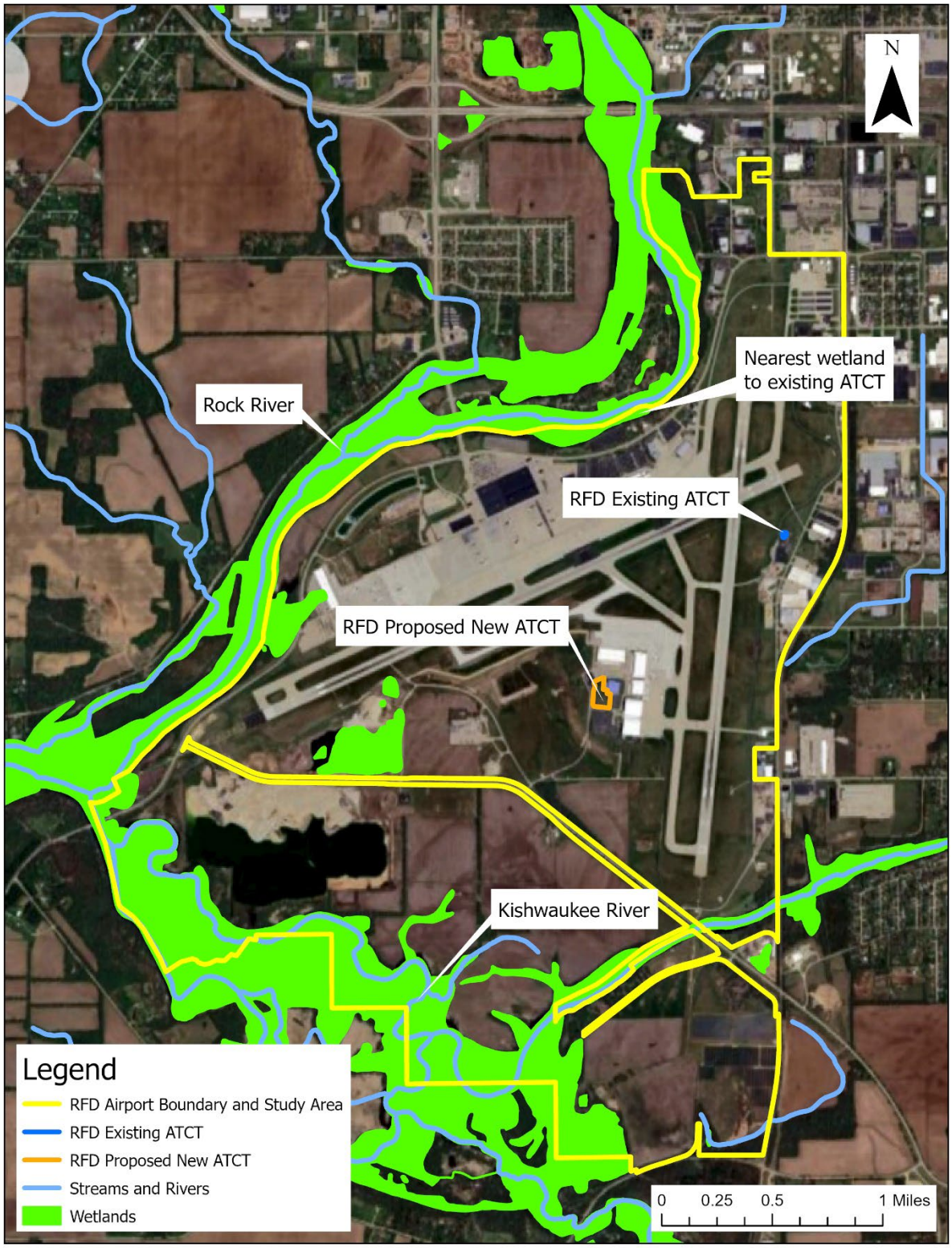

Figure 4-4. Aerial Image of Wetlands and Surface Water Features near RFD Airport

Wild and Scenic Rivers

There are no wild and scenic rivers located near RFD. The nearest river classified as wild and scenic is the Middle Fork Vermilion River located approximately 150 miles southeast of the study area (National Wild and Scenic Rivers System, 2025).

Rivers inventoried for inclusion under the National Wild and Scenic Rivers Act but have not been designated under the Act may have segments included in the Nationwide Rivers Inventory (NRI). These river segments meet at least one of the "outstandingly remarkable values" and are afforded some protections from impacts of federal actions, but do not receive the same protection and management as the designated Wild and Scenic Rivers (National Wild and Scenic Rivers System, 2024). The nearest NRI river segment is the Kishwaukee River located approximately 0.83 miles south of the proposed ATCT site. The Kishwaukee River is recognized for its remarkable recreational and scenic characteristics (NPS, 2025). The Kishwaukee River receives recreation use and the lower portion of the river flows through the scenic Kishwaukee River Gorge.

4.2.5.2 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for water resources impacts can be found in the ATCT Final PEA (FAA ATCT Final PEA, 2023) and FAA Order 1050.1G, Appendix A (FAA, 2025d).

Alternative 1: Proposed Action

The Proposed Action would cause temporary, short-term surface disturbing activities in the span of approximately 1.67 acres involving increased vehicle traffic and use of machinery at the proposed new and existing ATCT sites.

No direct impacts to wetlands would occur as the existing and proposed new ATCT sites are not located on or near any identified wetland features. Indirect impacts to wetlands are unlikely to occur given the nearest wetland feature is approximately 0.65 miles northwest of the existing ATCT site and approximately 0.78 miles west of the proposed new ATCT site.

No direct impacts to floodplains would occur as the existing and proposed ATCT sites are not located within any floodplains. Construction of the proposed new ATCT would increase impervious surface area from the new ATCT and parking areas. Given the minimal amount of added impervious surface area and existing drainage management, permanent impacts to water flow, retention, or storage within the floodplain are not anticipated.

No direct impacts to surface waters would occur as the existing and proposed new ATCT sites are not located near any surface water features. Disruption of surface soils and contamination of soils from chemicals, such as hydraulic fluids or petroleum leaks, could occur during ground disturbing activities. As mentioned in Section 4.2.5.1 Surface Water, runoff from the project area drains to the south of the airport. Therefore, no indirect impacts to the Rock River would be anticipated. Runoff containing contaminated soil could result in offsite interface with surface water in the Kishwaukee River through the outfalls south of the airport. Soil, sediment, or chemical runoff could indirectly or directly impact water quality, alter habit from sediment accumulation, or cause changes to the ecosystem from the introduction of non-native species.

The increased presence of heavy construction equipment, fuels, chemicals, or solvents during construction and demolition activities could affect groundwater if spills or leaks were to occur. The severity of the impact would depend on the volume or duration of the release and ability to respond appropriately. Although these impacts are not anticipated, applying BMPs, such as spill/leak monitoring and runoff prevention, could reduce or prevent impacts to groundwater and surface water from excavation and construction.

Excavation volume and depth for foundation structural components is unknown at this time. Given the depth is also unknown at the proposed new ATCT site, groundwater could be encountered during excavation and construction activities. If this were to occur and pumping is required to extract water and continue construction, groundwater would be pumped into the RFD's stormwater system. Disruption of groundwater and groundwater flow could occur at excavation sites and where structural components are installed; 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.

No impacts to wild or scenic rivers are expected from the Proposed Action as there are no wild or scenic rivers near the study area. The Kishwaukee River, listed in the NRI, although nearby would not be expected to be impacted by runoff containing contaminated soil as described above.

No direct impacts to wetlands, floodplains, surface water, groundwater, or wild and scenic rivers are expected to result from the Proposed Action. Sediment or contamination runoff could indirectly impact local wetland, surface water, and groundwater resources but is not anticipated.

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 water resources would occur.

4.2.5.3 Best Management Practices

BMPs to offset unavoidable impacts to water resources allow for onsite absorption of rainwater such as permeable surfaces, allowing natural drainage processes, and erosion prevention measures. Descriptions of recommended management practices for these wetlands, surface water, and groundwater are described below.

RFD operates under a general National Pollutant Discharge Elimination System permit issued by the Illinois Environmental Protection Act. This permit allows for stormwater discharge and RFD's Stormwater Pollution Prevention Plan (SWPPP) describes water testing requirements for all stormwater discharge. The SWPPP indicated that construction disturbing one or more acres requires the application for a General Storm Water Permit for Construction Site Activities. Through this application process, a separate SWPPP would be developed for the construction site activities to mitigate any potential impacts (RFD, 2025d).

General measures for reducing runoff and erosion, as described below, would prevent or reduce sediment and the introduction of non-native plant species from degrading nearby wetlands. These measures should be implemented within the study area to avoid the potential for temporary construction impacts to surface water and wetland features.

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

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

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

4.3 CONCLUSION

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

SECTION 5 | Public Involvement

The FAA is providing a 508-compliant electronic copy of this draft EA for review by the public on the following website: https://www.faa.gov/air_traffic/atf. Comments may be submitted to the FAA, Aaron.Comrov@faa.gov. One March 24, 2026, the FAA published a Notice of Availability in the *Rockford Register Star* newspaper to advertise the availability of the EA to allow the public to view the document electronically and how to submit comments. The public comment period ends at the close of business on April 24, 2026.

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APPENDIX A | Federally Listed Species Reports for Winnebago County and the Study Area

This appendix contains the lists of threatened, endangered, candidate, or species under review by the U.S. Fish and Wildlife Service for Winnebago 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
Illinois-Iowa Ecological Services Field Office
Illinois & Iowa Ecological Services Field Office
1511 47th Ave
Moline, IL 61265-7022
Phone: (309) 757-5800 Fax: (309) 757-5807

In Reply Refer To: 08/08/2025 16:31:23 UTC
Project Code: 2025-0133326
Project Name: RFD ATCT Replacement EA

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.

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 ECOSPHERE 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.

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/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.

Other Trust Resources and Activities

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
- Wetlands

OFFICIAL SPECIES LIST

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

This species list is provided by:

Illinois-Iowa Ecological Services Field Office
Illinois & Iowa Ecological Services Field Office
1511 47th Ave
Moline, IL 61265-7022
(309) 757-5800

PROJECT SUMMARY

Project Code: 2025-0133326
Project Name: RFD ATCT Replacement EA
Project Type: Airport - New Construction
Project Description: Research for preparing an Environmental Assessment of the proposed ATCT replacement project at RFD.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@42.19711334999995,-89.10145761888637,14z

Counties: Winnebago 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.

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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.

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

BIRDS

NAME	STATUS
Whooping Crane *Grus americana* Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non-Essential

INSECTS

NAME	STATUS
Hine's Emerald Dragonfly *Somatochlora hineana* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7877	Endangered
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
Rusty Patched Bumble Bee *Bombus affinis* There is **proposed** critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9383	Endangered
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
Eastern Prairie Fringed Orchid *Platanthera leucophaea* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/601	Threatened
Prairie Bush-clover *Lespedeza leptostachya* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4458	Threatened

CRITICAL HABITATS

There is 1 critical habitat wholly or partially within your project area under this office's jurisdiction.

NAME	STATUS
Rusty Patched Bumble Bee *Bombus affinis* https://ecos.fws.gov/ecp/species/9383#crithab	Proposed

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.

WETLANDS

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

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

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

FRESHWATER EMERGENT WETLAND

- PEM1C

FRESHWATER POND

- PUBGx
- PUBFx

LAKE

- L1UBHx

IPAC USER CONTACT INFORMATION

Agency: Federal Aviation Administration
Name: Joe Naughton
Address: 901 15th St NW
Address Line 2: Washington, DC, 20005
City: Washington
State: DC
Zip: 20005
Email [redacted]
Phone: [redacted]

U.S. Fish & Wildlife Service

ECOS

ECOS / Species Reports / Species County Report

Listed species believed to or known to occur in Winnebago, Illinois

This report includes species only if they have a **Spatial Current Range** in ECOS.

The following report contains species that are known to or are believed to occur in this county, based on the species current range, as defined by the USFWS. The definition of current range that the FWS uses is the general geographic area where we know or suspect that a species currently occurs.

This list of species by county cannot be used for consultation purposes. To obtain an official list of species that should be considered during consultation, please visit IPaC.

CSV

Show All entries Search:

12 Species Listings

Group	Name	Population		Status	Lead Region
Insects	Western regal fritillary (Argynnis idalia occidentalis)	Wherever found	Proposed Threatened	6	South Dakota Ecological Services Field Office
Mammals	Northern Long-Eared Bat (Myotis septentrionalis)	Wherever found	Endangered	3	Minnesota-Wisconsin Ecological Services Field Office

Mammals	Little brown bat (Myotis lucifugus)	Wherever found	Under Review	3	Indiana Ecological Services Field Office
Flowering Plants	Eastern prairie fringed orchid (Platanthera leucophaea)	Wherever found	Threatened	3	Chicago Ecological Service Field Office
Birds	Whooping crane (Grus americana)	U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY)	Experimental Population, Non-Essential	2	Assistant Regional Director-Ecological Services
Insects	Rusty patched bumble bee (Bombus affinis)	Wherever found	Endangered	3	Minnesota-Wisconsin Ecological Services Field Office
Insects	Hine's emerald dragonfly (Somatochlora hineana)	Wherever found	Endangered	3	Chicago Ecological Service Field Office
Insects	Regal fritillary (Speyeria idalia)	Wherever found	Resolved Taxon	6	South Dakota Ecological Services Field Office

Insects	Monarch butterfly (Danaus plexippus)	Wherever found	Proposed Threatened	3	Assistant Regional Director-Ecological Services
Mammals	Tricolored bat (Perimyotis subflavus)	Wherever found	Proposed Endangered	5	Pennsylvania Ecological Services Field Office
Flowering Plants	Prairie bush-clover (Lespedeza leptostachya)	Wherever found	Threatened	3	Minnesota-Wisconsin Ecological Services Field Office
Mammals	Indiana bat (Myotis sodalis)	Wherever found	Endangered	3	Indiana Ecological Services Field Office

Showing 1 to 12 of 12 entries Previous 1 Next

APPENDIX B | SHPO COORDINATION

U.S. Department of Transportation
Federal Aviation Administration

U.S. Department of Transportation
FEDERAL AVIATION ADMINISTRATION
Great Lakes Regional Office
Des Plaines, IL 60018

AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT PROGRAM

March 24, 2026

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act and Finding of No Historic Properties Affected for the Proposed Replacement Airport Traffic Control Tower (ATCT) at the Chicago Rockford International Airport, Rockford, Illinois

Carey L. Mayer
Deputy State Historic Preservation Officer
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702

Dear Ms. Mayer:

Introduction

The Federal Aviation Administration (FAA), in accordance with Section 106 of the National Historic Preservation Act of 1966 and implementing regulations (36 Code of Federal Regulations [CFR] Part 800), invites you to participate in consultation for the proposed construction of a new Airport Traffic Control Tower (ATCT) at Chicago Rockford International Airport (RFD), Rockford, Illinois. This letter's purpose is to initiate Section 106 consultation with your office in accordance with 36 CFR 800.3(c) and solicit any comments you may have about the proposed undertaking.

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

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

Description of the Undertaking

The FAA is proposing to build and operate an ATCT on 1.67 acres at latitude 42° 11' 27.25" N and a longitude of 89° 05' 52.55" W, approximately 0.82 miles southwest of the existing ATCT (see Exhibit 2 – Site Plans). The proposed undertaking would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements.

The existing ATCT is beyond its useful design life and has reached its operational and functional capability. The existing ATCT does not have the ability to accommodate upgrades to the latest air traffic

control technologies, lacks personnel space requirements and modern amenities, and exhibits physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation, plumbing). The proposed new 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 while meeting applicable FAA requirements.

The proposed tower cab floor elevation would be 190 feet above ground level (AGL), and the top of the tower would be 225 feet AGL. This is the minimum height that would meet all siting criteria under the Safety Management System. At this height, controllers would have unobstructed views of all airport-controlled areas and all airborne traffic with existing infrastructure. The tower would have an 8-sided, 650 square foot cab. The proposed design includes space for controller movement and combining air traffic controller positions. A 19,500 square foot base building would be constructed to replace the existing base building and Terminal Radar Approach Control Facility space.

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

Area of Potential Effects

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

Based on the potential for direct and indirect effects, the APE for the proposed undertaking includes a 0.75-mile radius around the location of the proposed ATCT and a 0.5-mile radius around the existing ATCT. Within the project area, construction, demolition, maintenance, and usage effects may occur (see Exhibit 1). New utilities would be placed from existing utility lines within the APE. Existing airport perimeter, maintenance, and public access roads would be used for construction and maintenance traffic.

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

Historic Property Identification

The RFD airport was first developed in 1947 on the property of Camp Grant, a World War I and World War II era Army infantry training base. Constructed in 1958, the existing ATCT is of a non-standard design. The non-standard ATCT design is separate from the seven historic-age standard design types for ATCTs used by the FAA since the mid-1960s. The date of construction for non-standard ATCTs covers a broad range, with some having been constructed prior to the formation of the FAA in 1958, while others were constructed simultaneously with the FAA's implementation of its standard design program. Unlike standard design towers, the non-standard towers are not characterized by a unifying architectural style, layout, materials, or overall design. The design of the non-standard towers, including height, and the presence or lack of a base building, varies widely and is reflective of the individual needs of the airport it serves.

Booz Allen Hamilton prepared a report, *Chicago Rockford International Airport Traffic Control Tower Historic Resources Survey, Winnebago County, Illinois*, evaluating the eligibility of the ATCT and eight other historic-age resources. This report recommended the: (1) existing ATCT as not individually eligible for the National Register of Historic Places (NRHP); and (2) remaining surveyed historic age resources within the APE as not eligible for the NRHP under Criteria A, B, C, or D. Due to previous ground disturbance within the project area (area of disturbance), no archaeological work was recommended.

No historic properties are listed within the study area on the National Park Service's (NPS) NRHP Database.

A cultural resources records search was conducted of the Illinois Historic and Architectural Resources Geographic Information System (HARGIS) on September 25, 2025. This search found a total of 15 previous cultural investigations, and 24 archaeological sites were within the study area. A total of 2 Illinois Archaeological Survey (IAS) Mounds, and no IAS Cemeteries were identified within the study area.

Assessment of Effects

Construction of the proposed new ATCT and demolition of the existing ATCT would occur within the developed airport property and APE. The proposed new ATCT site is located within the airport operations area at latitude 42° 11' 27.25" N and a longitude of 89° 05' 52.55" W. The existing ATCT to be demolished was determined individually ineligible for the NRHP. No historic properties would be impacted by the demolition or new construction.

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

The FAA proposes a Finding of No Historic Properties Affected for this proposed project.

Section 106 Consultation

In accordance with 36 CFR 800.3, the FAA has identified other parties to participate as Section 106 consulting parties, including the Chicago Rockford International Airport and the Rockford Historical Society. The FAA identified and will separately initiate consultation with the following federally recognized Tribes with known interests in the area, Citizen Potawatomi Nation; Forest Country Potawatomi Community, Wisconsin; Hannahville Indian Community, Michigan; Ho-Chunk Nation of Wisconsin; Kickapoo Tribe of Oklahoma; Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians of Michigan; Menominee Indian Tribe of Wisconsin; and Miami Tribe of Oklahoma. Invited parties will have 30 days to respond and provide comments.

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

Request for Comment and Concurrence

As outlined above, the purpose of this letter is to seek your concurrence with the FAA's Finding of No Historic Properties Affected and invite your views on the effects. We request that you review the

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

Sincerely,

Aaron Comrov

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

CCs:

Enclosures

Exhibit 1 – Project Area and Area of Potential Effects
Exhibit 2 – Site Plans
Exhibit 3 – *Chicago Rockford International Airport Traffic Control Tower Historic Resources Survey, Winnebago County, Illinois*