

United States Department of Transportation
Federal Aviation Administration
Finding of No Significant Impact (FONSI)

Airport Traffic Control Tower (ATCT) Replacement
at
Friedman Memorial Airport
Blaine County Idaho

EAXX-021-12-ARP-1761226912

April 2026

1. Introduction

This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) and provides final agency determinations and approvals for the federal actions necessary to implement the proposed Airport Traffic Control Tower (ATCT) Replacement at Friedman Memorial Airport (SUN). This FONSI is based on the information and analysis contained in the attached Final Environmental Assessment (EA), signed March 25, 2026, which is incorporated herein by reference. This Final EA also tiers off the Final Programmatic EA (ATCT Final PEA) and FONSI/ROD issued in September 2023. This Final EA has been prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA) and in accordance with FAA Order 1050.1G *Environmental Impacts: Policies and Procedures* and US DOT Order 5610.1D *DOT's Procedures for Considering Environmental Impacts*. Although the 2023 PEA was initially developed for FAA-owned towers, the FAA determined that since the ownership of the ATCT is irrelevant to the environmental impacts, the PEA can be used for other ATCT replacement towers.

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

- Air Quality – The proposed action would result in a short-term and temporary increase in emissions and dust (particulate matter) during construction and demolition activities. In addition, a long-term reduction in emissions from reduced energy use is expected from the new ATCT.

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

In addition to confirming the above resource categories would have no significant impacts from the Proposed Action, the Final EA includes detailed site-specific analyses for the resource areas not covered by the ATCT Final PEA and FONSI/ROD.

2. Proposed Action

The FAA’s Proposed Action is to replace the existing ATCT with a modern ATCT at SUN. The Proposed Action is anticipated to include:

- Acquisition of a new lease with the Airport Authority to construct a replacement ATCT in a new location.
- Approval of a new Airport Layout Plan (ALP) incorporating the relocation of the ATCT.
- Construction and operation of a new approximately 84-foot ATCT (plus approximately 17-foot-high antennas) and associated facility support features such as fencing and vehicle parking on an approximately 0.3-acre site southeast of the terminal building.
- 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 and associated infrastructure within the Runway Object Free Area (ROFA), including portion of fence surrounding existing ATCT.
- Relocation of existing radio communications link repeater to enable project implementation.

The proposed timeframe to replace the ATCT is approximately five years from the start of construction to the air traffic services cutover and demolition of the existing ATCT. Construction is expected to begin in 2027 with the new ATCT opening in 2032.

3. Purpose and Need

This Purpose and Need is tiered from, and consistent with the ATCT Final PEA (FAA ATCT Final PEA, 2023) but focuses on the specific requirements of the SUN ATCT. The SUN ATCT is an airport-owned federal contract tower (FCT) ATCT that is eligible for replacement under the ATCT Replacement Program.

The purpose of the Proposed Action is to replace the SUN ATCT with a modern ATCT located outside airport approach surfaces and runway safety areas with an updated facility meeting FAA ATCT siting criteria guidance, providing for uninterrupted air traffic control services. The Proposed Action at this airport would provide for a modern, operationally efficient ATCT that would meet applicable FAA requirements. This replacement ATCT would enable the installation of modern and required air traffic control equipment, improve visibility of the airport property by controllers, provide adequate space and an enhanced work environment for ATCT personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design including energy efficient features, windows, and ventilation/heating systems while meeting applicable FAA requirements.

The FAA recognizes the need to provide continual air traffic control services at SUN. The existing SUN ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, does not meet personnel space requirements, does not meet modern Americans with Disabilities Act (ADA) requirements, lacks modern amenities, and has physical problems such as maintenance-intensive deficient mechanical appurtenances (i.e., heating and ventilation, plumbing). Improvements made to rectify the needs must ensure uninterrupted air traffic control services to maintain the safety of the NAS.

The existing ATCT is located on the east side of the airfield within the ROFA and it is a Part 77 transitional surface penetration. Additionally, it does not meet FAA ATCT siting criteria guidance contained in FAA Order 6480.4C, *Airport Traffic Control Tower Siting Process*. The existing ATCT is currently deficient in terms of technology, cab height, and location to support the existing and future role of the Airport.

Due to the surrounding mountainous terrain and frequent low-visibility conditions, operations at SUN are extremely technical. The ATCT substantially decreases the risk of runway incursions

and other accidents, and on-site monitoring of weather conditions provided by the ATCT is invaluable to pilots negotiating takeoffs and landings. In addition, the Airport's head-to-head operational pattern (or opposite direction operations) and single parallel taxiway necessitate substantial coordination by tower personnel to properly accommodate takeoffs and landings and maintain efficiency. An ATCT is also necessary for SUN to maintain commercial passenger service operations.

The Airport is currently undergoing a Master Plan Update (officially titled the Airport Infrastructure and Optimization Study). This Study will evaluate the potential for future Modification of Standards (MOS) that might be applied for in the future. Currently, the Airport is operating under a nonstandard Condition where the existing ATCT is located within the ROFA. The Airport and FAA are working to resolve this nonstandard condition by replacing and relocating the existing ATCT.

4. Alternatives

Representatives from the FAA and SUN conducted siting for this project in conjunction with the FAA's Virtual Immersive Siting Tower Assessment (VISTA) modeling process. The FAA and SUN representatives met virtually to participate in siting activities. The study was finalized in December 2025.

The FAA identified criteria to select and evaluate alternatives (as described in Section 3.2 of the BIL ATCT Replacement PEA). These included ATCT technical criteria and other characteristics to meet the purpose and need.

The Final EA analyzed the Proposed Action Alternative (as determined by the ATCT siting process) and the No Action Alternative for the proposed replacement of the SUN ATCT. Other alternatives which were considered in the siting report were not carried forward as they did not meet the technical siting criteria as outlined in FAA Order 6480.4C, Siting of Airport Traffic Control Towers.

The Proposed Action includes construction and operation of a replacement ATCT located approximately 1,070 feet southwest of the existing ATCT. The Proposed ATCT location is an open lot that has been graded and is covered by asphalt and gravel. The proposed tower cab floor is 65 feet above ground level (AGL) and 5,368 feet above mean sea level (MSL), with a total tower height of 84 feet AGL. This is the minimum height that would meet all siting criteria under the Safety Management System. The four-sided tower is anticipated to have an approximately 500 square foot cab on a 32 feet by 28 feet rectangular shaft. The proposed design is expected to include space for four air traffic controller positions. This proposed design would allow for a safe operating environment and would include upgrades

for resistance against seismic events that have potential to occur in the area. New utilities (water, power, gas, telephone) would be placed from existing lines within the study area. Existing local roads would be used for construction and maintenance traffic. The Proposed Action also includes demolition of the existing SUN ATCT and the associated inner portion of perimeter fence surrounding the ATCT site. Upon demolition of the existing ATCT, the site would be converted to match similar conditions of the surrounding area. Utilities that tie to the existing ATCT would be disconnected or abandoned.

In addition to the Proposed Action, the Final EA analyzed the No Action Alternative. The No Action Alternative would maintain the status quo (baseline conditions) without federal agency involvement. The No Action Alternative represents the conditions that would be anticipated if the Proposed Action were not implemented. Under the No Action Alternative, replacement, and demolition of the existing ATCT would not occur. The existing ATCT would continue to be in use for air traffic control operations. New, modern equipment would not be available, and improvements to the safety, efficiency, and resiliency of the NAS would not be realized at SUN. 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. The No Action Alternative would not meet the purpose and need for the project.

5. Affected Environment

The Airport is located in Blaine County, Idaho, directly south of the City of Hailey's urban core, west of State Highway 75, east of the Wood River, and less than two miles north of the City of Bellevue. The Friedman Memorial Airport Authority (FMAA or Sponsor) operates and manages the Airport.

SUN is a commercial service airport serving several airlines and general aviation traffic. The geography surrounding the Airport presents a unique situation for aircraft utilizing SUN. The runway slopes uphill to the north, favoring landings from and takeoffs to the south. Based on these factors and the physical constraints of the Airport's airspace due to mountainous terrain, departures at the Airport are predominately to the south on Runway 13 and arrivals from the south on Runway 31. This "one-way-in/one-way-out" operation is utilized by commercial airline aircraft and most of the large general aviation aircraft fleet, including corporate jets.

6. Environmental Consequences

The FAA identified and evaluated potential environmental impacts in the SUN Airport ATCT Replacement Final EA. The Proposed Action will not change flight patterns, altitudes, or aircraft traffic volumes. Noise levels will be unchanged. The Final EA tiers off of the ATCT Final PEA and FONSI/ROD (September 2023) which identified that ATCT replacement is not anticipated to have significant impacts to any environmental impact category identified in in FAA Order 1050.1G. A site-specific evaluation validated that significant impacts are not anticipated to these resource categories.

The Final EA included detailed site-specific analyses for: biological resources (including fish, wildlife, and plants), coastal resources, historical, architectural, archaeological, and cultural resources, Department of Transportation Section 4(f) resources, visual effects, and water resources.

Based on the analysis within the Final EA, the FAA determined there would be no significant impact to the environment from implementation of the Proposed Action. That said, the following minimization measures will be implemented with the Proposed Action.

The Sponsor will include an Inadvertent Discovery Plan as a contract provision. In the unlikely event that cultural resources are discovered during construction, demolition, and/or maintenance activities, activity would cease in the area of the resource and the FAA and SHPO would be notified and given the opportunity to review. The uncovered resources would be protected. In compliance with all applicable laws and regulations, the FAA would consult with the SHPO on the discovery. The FAA would consider their recommendations, conduct appropriate actions, then provide a report of those actions after they are completed (36 CFR 800.13).

The Sponsor would contractually obligate the contractor to obtain and adhere to an Idaho Pollutant Discharge Elimination System (IPDES) Construction General Permit (CGP), as required by law. Grading plans and stormwater design would follow FAA standards for airfield construction (FAA AC 150/5370-10H, *Standards for Specifying Construction of Airports*).

7. Public Involvement

The proposed project was discussed at multiple FMAA Board Meetings, which are open to the public. Airport staff provided project status updates to the FMAA Board at the meetings on October 7, 2025; January 6, 2026; February 3, 2026; and March 3, 2026.

On December 30, 2025, the FMAA provided an electronic copy of the EA for public review on the following website: <https://iflysun.com/atct-replacement/>. The FMAA published a Notice of Availability in the *Idaho Mountain Express* Newspaper on Wednesday January 14, 2026. The formal public comment period concluded on February 14, 2026. Four comments were submitted by community members. None of the comments provided new information that would necessitate additional analysis in the FEA. The comments received and the responses to each comment can be found in Appendix E of the EA.

8. Finding

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

This decision does not constitute a commitment of funds under the AIP; however, it does fulfill the environmental prerequisites to approve applications for grants of AIP funds for the proposed project in the future (49 U.S.C § 47101).

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

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