

*APPENDIX D*  
*SECTION 106 CONSULTATION MATERIALS*

## **Cultural Resources Assessment**

# CULTURAL RESOURCES ASSESSMENT

**FRESNO YOSEMITE INTERNATIONAL AIRPORT  
AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT IMPLEMENTATION  
CITY OF FRESNO  
FRESNO COUNTY, CALIFORNIA**



**LSA**

September 2024

# **CULTURAL RESOURCES ASSESSMENT**

## **FRESNO YOSEMITE INTERNATIONAL AIRPORT AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT IMPLEMENTATION CITY OF FRESNO FRESNO COUNTY, CALIFORNIA**

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## MANAGEMENT SUMMARY

LSA conducted a cultural resources assessment for the Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Replacement Implementation Project (Project) located in Fresno, Fresno County, California. The assessment was completed in compliance with Section 106 of the National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), and the California Environmental Quality Act (CEQA) by personnel who meet the Secretary of the Interior's Professional Qualification Standards in the fields of architectural history and archaeology.

The FAT is comprised of approximately 1,700 acres, but the Area of Potential Effects (APE) for the proposed undertaking consists of two locations totaling approximately 6 acres. A 4.20-acre portion of the APE is developed with the ATCT building, the adjacent employee parking lot, the airfield apron directly adjacent to the ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, and a landscaped area south of the ARFF facility. A 1.78-acre portion of the APE is a vacant lot located approximately 0.23 mile southwest of the ATCT, off of East Andersen Avenue, and will be used as a construction staging area. The proposed undertaking consists of the demolition of the ATCT building, which is owned by the City of Fresno (City). Construction of a new ATCT building and reconstruction of the employee parking lot and security fencing are proposed within the APE. The maintenance building and ARFF will not be modified by the proposed Project.

This study was required by the Federal Aviation Administration (FAA) and the City. The FAA is the Lead Agency for compliance with NEPA, which includes Section 106 of the NHPA. The City of Fresno is the Lead Agency for compliance with CEQA.

The purpose of the study is to provide the FAA and the City with the necessary information and analysis, as mandated by NEPA and CEQA, to determine whether the proposed undertaking would cause any adverse effects to a "historic property" or substantial adverse changes to a "historical resource." In order to identify and evaluate such resources, LSA conducted a cultural resources records search, historical background research, and carried out an intensive-level field survey. These efforts resulted in the identification of three historic-period (50 years of age or older) buildings in the APE. These buildings (the ATCT, the maintenance building, and the ARFF) were evaluated for historical significance under the criteria for listing in the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) (see Appendix A).

As a result, LSA recommends to the FAA and the City that neither the maintenance building nor the ARFF facility meet the criteria for listing in the National Register or the California Register or for designation under the Fresno Historic Preservation Ordinance. They are not "historic properties" for purposes of NEPA, including Section 106 of the NHPA, or "historical resources" under CEQA.

LSA recommends to the FAA and City that the FAT ATCT is eligible for listing in the National Register under Criterion C at the local level of significance as a highly intact representative example of the International style of architecture as applied to an airport traffic control tower and as a good example of the work of master architect and Fresno native Allen Yuen Lew, Fellow of the American Institute of Architects (FAIA). It also appears eligible for listing in the California Register under

Criterion 3 and for designation as a Historic Resource under the Fresno Historic Preservation Ordinance for the same reasons. The period of significance is 1961, when the building was first occupied. The FAT ATCT is a “historic property” for the purposes of NEPA, including Section 106 of the NHPA, and a “historical resource” for the purposes of CEQA. Pursuant to Section 106, the proposed demolition of the ATCT would be a significant adverse effect to the historic property. It would also be a substantial adverse change to the historical resource pursuant to CEQA. Demolition cannot be mitigated to a level that is less than significant.

Regarding archaeological resources, the negative results of the records search and the severely disturbed (from 5 to 25 feet in depth)/obscured nature of the Project APE suggest a very low sensitivity for in situ archaeological resources. Therefore, no further investigation or archaeological monitoring is recommended.

In the event previously undocumented archaeological resources are identified during earthmoving activities, further work in the area should be halted until the nature and significance of the find can be assessed by a qualified archaeologist.

In the event human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment.

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## INTRODUCTION

At the request of RS&H, LSA performed a cultural resources assessment for the Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Replacement Implementation Project (Project), which includes approximately 6 acres of land within the FAT in Fresno, Fresno County, California (see Figure 1). The immediate Project setting is characterized by typical airport features such as runways, hangars, the airport terminal, and parking lots. The FAT is within a larger suburban setting that includes office parks, residential neighborhoods, a golf course, and some agricultural fields.

The Federal Aviation Administration (FAA), as Lead Agency for compliance with the National Environmental Policy Act (NEPA), including Section 106 of the National Historic Preservation Act (NHPA), and the City of Fresno (City), as the Lead Agency for compliance with the California Environmental Quality Act (CEQA), required this assessment as part of the environmental review processes.

LSA performed the present study to provide the FAA and the City with the necessary information and analysis, as mandated by NEPA/Section 106 and CEQA, to determine whether the proposed Project (see Figure 2), described below, would cause any adverse effects or substantial adverse changes to any historic properties or historical resources within the Area of Potential Effects (APE; see Figure 3), also described below.

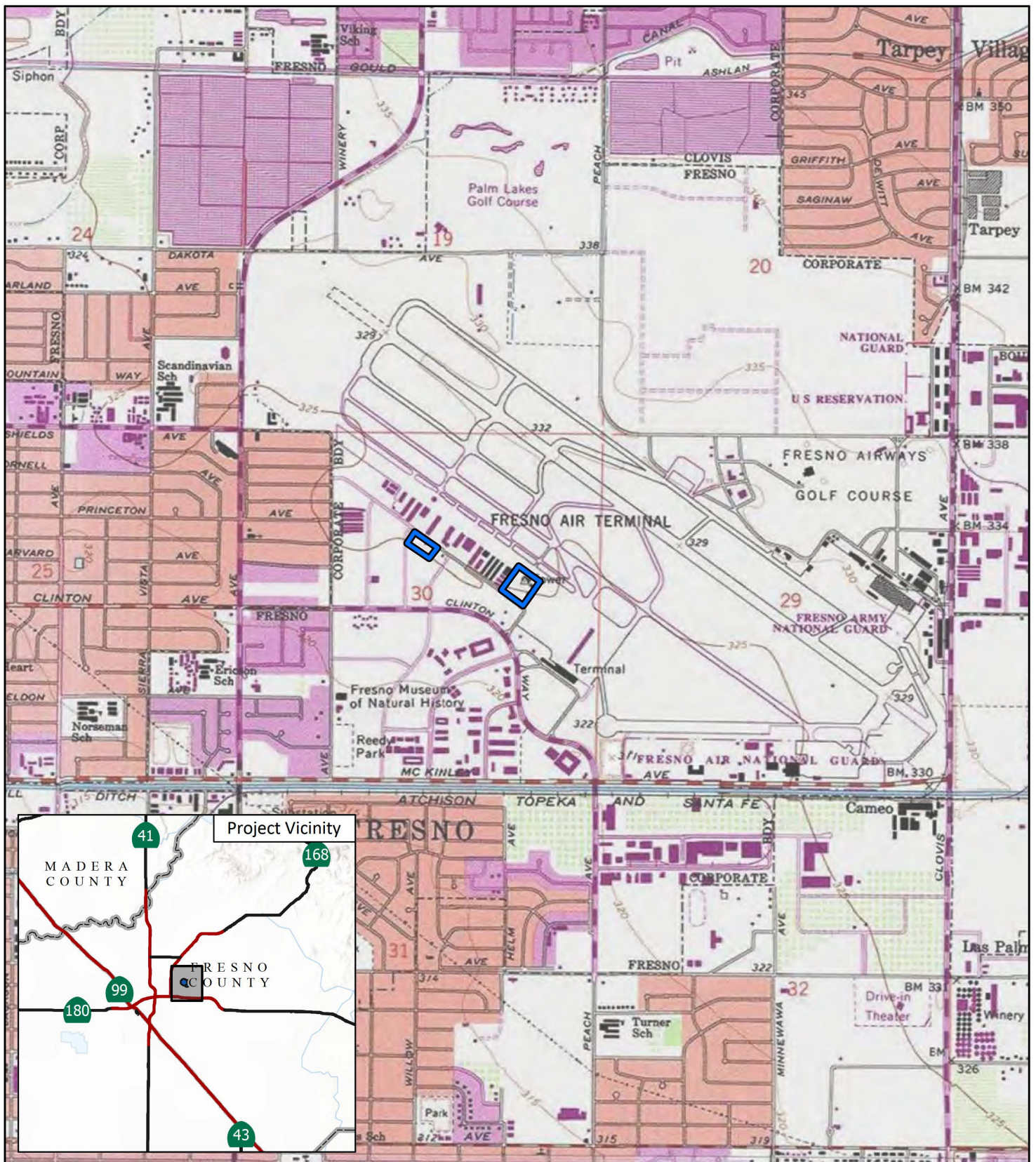
## PROJECT DESCRIPTION

The proposed Project (see Figure 2) includes the following components and activities:

- Construction of a new ATCT facility and demolition of the existing ATCT facility once the new ATCT facility is fully operational
- Installation of new equipment in the replacement ATCT and utility services to the replacement ATCT facility
- Reconstruction of the existing employee parking and installation of security fencing around the ATCT facility and accompanying employee parking lot
- Construction staging areas

The new ATCT facility would be constructed approximately 250 feet south of the existing ATCT. The new facility would have an estimated building footprint of 13,000 square feet (sq ft) and include a building at the base of the functional shaft of the tower and a control cab at the top of the functional shaft, with an airport beacon and antennae atop the cab.





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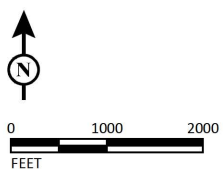
 Area of Potential Effects

FIGURE 1



SOURCE: USGS 7.5' Quad - Clovis (1981), CA

I:\2023\20230936.01\GIS\Pro\Fresno ATCT\Fresno ATCT.aprx (8/19/2024)

Fresno ATCT  
Regional and Project Location





FIGURE 2

LSA



0 50 100  
FEET

SOURCE: RS & H

I:\2023\20230936.01\G\Site\_Plan.ai (8/15/2024)

Fresno ATCT  
Proposed Project





FIGURE 3

LSA



0 150 300  
FEET

SOURCE: RS & H

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Fresno ATCT  
Area of Potential Effects



The base building would include administrative offices and spaces and a Terminal Radar Approach Control (TRACON).<sup>1</sup> The cab would be approximately 440 sq ft in size and be able to accommodate four controller positions plus a supervisor. The floor of the cab would be 150 feet tall; and the cab would be about 17 feet tall, with up to 23 feet of additional height from antennas extending above the cab, for a total ATCT height of up to 190 feet.

## AREA OF POTENTIAL EFFECTS

According to 36 Code of Federal Regulations (CFR) 800.2(c), the APE is “the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist.” The APE includes the areas of direct (i.e., physical) and indirect (i.e., visual, atmospheric, and audible) impacts. The APE encompasses a total of 5.98 acres and includes the existing ATCT, the adjacent employee parking lot, the airfield apron directly adjacent to the existing ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, a landscaped area south of the ARFF facility, and a portion (1.78 acres) of a vacant lot approximately 0.23 mile southwest of the existing ATCT off East Andersen Avenue for use as a construction staging area (see Figure 3, above). The vertical APE extends from the existing ground surface to a depth of approximately 65 feet below ground surface for piles for foundations of the new ATCT facility. All components of the proposed Project would occur within the APE.

The airport maintenance building and the ARFF facility will not be modified by the proposed Project. These two buildings are included in the APE due to their proximity to the Project components and their ages (over 45 years old).

The existing ATCT foundation is approximately 25 feet deep. Existing utilities within the APE vary in depth from 5 feet for plumbing and electrical down to approximately 21 feet for floor drains. The piles for the foundations of the new ATCT would be approximately 65 feet deep. The proposed utilities would be at the same depth as existing utilities, down to approximately 5 feet.

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<sup>1</sup> Controllers at a TRACON provide air traffic service to aircraft as they transition between an airport and the en route phase of flight and from the en route phase of flight to an airport. This includes the departure, climb, descent, and approach phases of flights.

## REGULATORY FRAMEWORK

### SECTION 106/NATIONAL HISTORIC PRESERVATION ACT

The principal federal law addressing historic properties is the NHPA, as amended (54 United States Code [USC] 300101 et seq.), and its implementing regulations (36 CFR Part 800). Section 106 requires a federal agency with jurisdiction over a proposed federal action (referred to as an “undertaking” under the NHPA) to consider the effects of the undertaking on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on the undertaking. The term “historic properties” refers to “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register” (36 CFR Part 800.16[l][1]). The implementing regulations (36 CFR Part 800) describe the process for identifying and evaluating historic properties, for assessing the potential adverse effects of federal undertakings on historic properties, and for seeking to develop measures to avoid, minimize, or mitigate adverse effects. The Section 106 process does not require the preservation of historic properties; instead, it is a procedural requirement mandating that federal agencies consider effects to historic properties from an undertaking prior to approval.

The steps of the Section 106 process are accomplished through consultation with the State Historic Preservation Officer (SHPO), federally recognized Native American tribes, local governments, and other interested parties. The goal of consultation is to identify potentially affected historic properties, assess effects to such properties, and seek ways to avoid, minimize, or mitigate any adverse effects on such properties. The agency also must provide an opportunity for public involvement (36 CFR Part 800.1[a]). Consultation with Native American tribes regarding issues related to Section 106 and other authorities (e.g., NEPA and Executive Order No. 13007) must recognize the government-to-government relationship between the federal government and Native American tribes, as set forth in Executive Order 13175, 65 Federal Register 87249 (November 9, 2000), and the Presidential Memorandum of November 5, 2009.

#### National Register of Historic Places

The National Register of Historic Places (National Register) was established by the NHPA as “an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment” (36 CFR Part 60.2) (California Office of Historic Preservation [OHP] 2022). The National Register recognizes a broad range of cultural resources that are significant at the national, State, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. As noted above, a resource that is listed in or eligible for listing in the National Register is considered a “historic property” under Section 106 of the NHPA.

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

- Are associated with events that have made a significant contribution to the broad patterns of our history;
- Are associated with the lives of persons significant in our past;
- Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- Have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as “the ability of a property to convey its significance.” The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity, a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.

Ordinarily, religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the Criteria Considerations (A–G), in addition to meeting at least one of the four significance criteria and possessing integrity.

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA applies to all discretionary projects undertaken or subject to approval by the State’s public agencies. CEQA states that it is the policy of the State of California to “take all action necessary to provide the people of this state with... historic environmental qualities... and preserve for future generations examples of the major periods of California history.” Under the provisions of CEQA, “A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.”

CEQA requires that historical resources and unique archaeological resources be taken into consideration during the CEQA planning process (14 California Code of Regulations [CCR] §15064.5; Public Resources Code [PRC] §21083.2). If feasible, adverse effects to the significance of historical resources must be avoided or the effects must be mitigated (14 CCR §15064.5[b][4]). CEQA requires that all feasible mitigation be undertaken even if it does not mitigate impacts to a less than significant level (14 CCR §15126.4 [a][1]).

## Historical Resources

The term CEQA uses for significant cultural resources is “historical resource,” which is defined as any resource that meets one or more of the following criteria:

1. Listed in, or eligible for listing in, the California Register of Historical Resources (California Register);
2. Listed in a local register of historical resources (as defined at PRC §5020.1[k]);
3. Identified as significant in a historical resource survey meeting the requirements of PRC §5024.1(g); or
4. Determined to be a historical resource by a project's lead agency (14 CCR §15064.5[a]).

A historical resource consists of "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

### California Register of Historical Resources

The California Register criteria are based on National Register criteria. For a property to be eligible for inclusion in the California Register, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The California Register requires that a resource possess integrity, which is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (OHP 2022). To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Determining the most important factor depends on the particular criterion under which the resource is considered eligible for listing (OHP 2022).

## CULTURAL SETTING

### PREHISTORY

Chronologies of prehistoric cultural change in Central California have been attempted numerous times, and several are reviewed in Moratto (2004). No single description is universally accepted as the various chronologies are based primarily on material developments identified by researchers familiar with sites in a particular region and variation exists essentially due to the differences in those items found at the sites.

A generalized cultural sequence for the Project vicinity, however, has been refined from Fredrickson's (1974) Paleo-Indian, Archaic, and Emergent sequence (Rosenthal et al. 2007). The earliest period is the Paleo-Indian (11,550 to 8,550 B.C.), followed by the Lower Archaic (8,550 to 5,550 BC), Middle Archaic (5,550 to 550 B.C.), Upper Archaic (550 BC to 1,100 AD) and, finally, the Emergent (1,100 AD to Historic).

Changes in settlement patterns and subsistence focus are viewed as cultural adaptations to a changing environment, which begins with gradual environmental warming in the late Pleistocene, followed by a brief return to pluvial conditions, and concludes with a general warming and drying trend, with periodic reversals that continue to the present (Wallace 1978a).

### ETHNOGRAPHY

The Project is within the traditional cultural territory of the Northern Yokuts (Kroeber 1925, Wallace 1978b). Tribal territories were somewhat fluid and changed over time. Like other Native American groups in Northern California, they were semi-nomadic hunter-gatherers who subsisted by exploitation of seasonably available plant and animal resources. The first written accounts of Native American groups in California were by Spanish missionaries in the late 18th century. Later documentation of the Northern Yokuts was by Barrett (1908), Cook (1955), Kroeber (1963) and many others.

### HISTORY

Fresno is located in the San Joaquin Valley which is in the southern portion of the Central Valley and part of California's "breadbasket." Fresno is the largest city by population in the San Joaquin Valley (Valley), the county seat of Fresno County, and along with Visalia, makes up one of only three densely populated urban centers in the Valley. Although the first European, a Spanish soldier named Pedro Fages, entered the Valley in 1772, the Valley remained largely unsettled throughout the Spanish/Mission (1769–1821) and Mexican/Rancho (1821–1848) periods. During the Gold Rush of 1849, the Valley was close enough to the gold fields to become a source of food products and a travel route from ports on California's south and central coast (Capstone California 2024). However, it was not until after the first irrigation canal tapped into Kings River near Centerville in 1868 that farmers were attracted to the area (Engineering With Nature 2024). In 1872, the Central Pacific Railroad established a station near a large wheat farm and founded the town of Fresno (Anonymous 2024). Fresno incorporated in 1885 (Ibid.). In the 1890s, Fresno had a thriving commercial center. It continued to grow in area and population into the early 1900s and, like much of California,

experienced a construction boom in the 1920s that was halted by the Great Depression in the 1930s.

During World War II (WWII) the economy re-opened to international trade, demand for American exports increased, and the government invested in our national defense industry, all of which benefited California. In 1941, Hammer Field was established east of the Fresno city limits and leased to the Army Air Corps (Planning Resource Associates, Inc. 2008). During the war, Hammer Field was an important training center for night flying and aviation technicians (Suzassippi 2023). In 1946, the War Assets Administration reallocated Hammer Field to the City of Fresno, which planned to use the facility as a commercial airport (Anonymous 2023b).

In the post-war years, the population in Fresno increased by 66 percent between 1940 and 1950. Fresno initially gave priority to housing needs for returning veterans and constructed public housing for them near the new Veterans Hospital in East Fresno. Soon developers started building tract homes on vacant land, expanding the city with new residential neighborhoods and related amenities like schools and shopping centers. Through the 1950s and 1960s, the city thrived. In the 1970s and 1980s, like many cities, it experienced a decline especially in the central core, but has since rebounded.

## METHODS

### RECORD SEARCH

On June 17, 2024, the cultural resources record search was completed for the APE by staff at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield. It included a review of all recorded historic and prehistoric archaeological sites and known cultural resource reports within 0.5 mile of the APE. Appendix B contains the record search results.

### ARCHIVAL RESEARCH

LSA conducted archival research during the months of September, October, and November 2023. Research methods focused on the review of a variety of primary and secondary source materials relating to the history and development of the FAT and the ATCT and the architect who designed the building. Sources included, but were not limited to, online sources, published literature in local and regional history, news articles, historic aerial photographs, historic maps, and original design plans (provided by the FAT). The City of Fresno Mid-Century Modern Historic Context (Planning Resource Associates, Inc. 2008:10-50) was also used. In addition, the following groups and individuals were contacted:

- Historic Fresno
- Fresno County Public Library Heritage Center
- San Joaquin Valley Chapter of the American Institute of Architects (AIA)
- Joe Moore (local historian)
- John Edward Powell (former Fresno architectural historian and former Lew and Patnaude employee)
- Karana Hattersley-Drayton, M.A. (Fresno-based architectural historian)
- Matthew Patnaude (son of Allen Y. Lew's partner William E. Patnaude)
- Shaunt Yemenjian (Fresno architect)

Information received from these sources is cited within the report where appropriate.

### FIELD SURVEY

On September 11, 2023, LSA architectural historian, Casey Tibbet, M.A., and LSA field photographer Dennis Lechner conducted the intensive-level architectural survey with the assistance of Richard L. Madrigal, Airports Projects Supervisor. During the survey, Mr. Madrigal provided information about the facility, while Ms. Tibbet took notes and Mr. Lechner took photographs of the exterior of the ATCT and its setting. Ms. Tibbet recorded the structural and architectural characteristics and current conditions of the building and associated features. She also conducted a reconnaissance-level survey of the maintenance building and ARFF facility, as well as the hangars adjacent to the APE. All of these are utilitarian and architecturally unremarkable. In July 2024, supplemental photography of the maintenance building and ARFF facility was provided by airport personnel.



## RESULTS

### RECORD SEARCH

Data from the SSJVIC indicate that there have been four cultural resource studies previously conducted within 0.5 mile of the proposed Project, none of which included any portion of the APE. No cultural resources are documented either within the APE or within the 0.5-mile search radius (see Appendix B).

### ARCHIVAL RESEARCH

As a result of the archival and other research, the following historical background was developed.

#### City of Fresno

Except where noted, the following information about the settlement and development of the City of Fresno is from the City of Fresno Mid-Century Modernism Historic Context (Planning Resource Associates, Inc. 2008:10-50).

Fresno Station, the precursor of the City of Fresno, was founded in May of 1872 by the Central Pacific Railroad Company. The location was reportedly selected by Leland J. Stanford, a Director for the railroad. The original town site, surveyed by Edward H. Mix, was organized on a grid with uniform blocks, 25-by-150-foot lots, and 20-foot alleys. Fresno became the County seat in 1874, kicking off a period of prosperity. The combination of fertile land, a steady water supply, and the service and mobility made possible by the railroad enabled Fresno to become the leading agricultural center in the San Joaquin Valley. In 1885, when Fresno incorporated, there was scattered development throughout an approximate six-block radius of the railroad station near the corner of H and Mariposa Streets (approximately 10 miles south of the FAT). In 1892, streetcars were introduced, and streetcar suburbs soon followed (City of Fresno 2023a).

In the 1890s, Fresno's transformation from a small town to a city with a thriving commercial center was evident. From 1890 and to 1900, the City increased in area from 2.94 square miles to 34.86 square miles and in population from 10,818 to 12,470 people. By 1910, the population had nearly doubled. In the 1920s, Fresno, like much of California, experienced a construction boom. Growth and development continued until the Great Depression.

The Depression had a significant impact on the San Joaquin Valley. Farmers from the Dust Bowl were attracted to the Valley because of its successful agricultural industry. However, Valley farmers were struggling to hold onto their land. The influx of people from the Dust Bowl caused more competition for the few available jobs. Those who could not find agricultural work sought employment in the nearby cities like Fresno but found little relief.

In 1933, President Roosevelt's New Deal introduced a number of programs to improve housing conditions and created the Public Works Administration (PWA) to distribute nearly \$6 billion (from 1933 to 1939) for public works projects. Subsequent legislation built on these programs and included the 1935 "Second New Deal", which created the Works Progress Administration (WPA).

The WPA provided almost \$5 billion for work relief for the unemployed to work on construction of airports, schools, hospitals, roads, and other buildings. In Fresno, a partnership of architects designed the majority of buildings constructed in the city under the New Deal. These projects transformed the city's civic center between 1936 and 1941 and included: the Fresno Memorial Auditorium, the United States Post Office, the Fresno County Hall of Records, the Fresno Unified School District Administration Building, and the Fresno City Hall. New Deal programs also benefited Fresno through park improvements, fire stations, sidewalks, and the construction of Chandler Field/Fresno Municipal Airport. Chandler Field, located on Kearney Boulevard approximately nine miles southwest of Fresno Yosemite International Airport, was constructed between 1936 and 1937 using WPA funds and, as of 2008, was notable as one of the most intact WPA-funded airports in the country.

WWII helped pull America out of the Depression. It re-opened the economy to international trade, increased demand for American exports, and triggered government investment in our national defense industry. The California economy in particular benefited from government war contracts, receiving almost 12 percent of all contracts and producing 17 percent of all war supplies. The 1940s saw an influx of military personnel as military bases throughout California played a significant role in defense operations. An estimated 60,000 servicemen were stationed in Fresno or at nearby facilities including the new bomber base Hammer Field (now Fresno Yosemite International Airport) and Camp Pinedale. During the war years, the City also saw an increase in Mexican agricultural laborers who were recruited to fill the gaps resulting from the military draft. At the same time, more than 1,000 American and foreign-born Japanese people in the City and County of Fresno were taken to internment camps.

Two local assembly center sites, with more than 500 buildings, were located at the Fresno County Fairgrounds and an undeveloped industrial area in Pinedale. The Fairground was the site of one of 13 temporary detention facilities for the Japanese in California. These facilities were intended as temporary confinement centers until permanent internment camps could be built in more isolated areas throughout the country. Over 5,000 Japanese Americans were confined at the Fresno location from May to October 1942.

The war not only ended the Depression in the United States but created conditions for postwar productivity and successful collaboration between the federal government, private industry, and organized labor. In the postwar years, the country experienced unprecedented growth. California, in particular, experienced unparalleled prosperity. With a population increase of 53 percent between 1940 and 1950, the demand for housing was enormous. Along with the housing demand came the need for more schools, government facilities, and improved infrastructure, not to mention amenities like shopping centers and recreational facilities. In Fresno, the population increased from 60,685 in 1940 to 91,669 in 1950, not including military personnel or the Japanese.

The postwar construction boom changed the way Americans lived and gave birth to vast postwar suburbs. In southern California, citrus groves and other agricultural lands gave way to large tracts of single-family residences primarily designed for working and middle-class families. New principles of community planning were incorporated into these neighborhood-scale, residential developments that often featured pedestrian-friendly, curvilinear streets and 300–400 nearly identical homes.

Prior to the war, the only residential development north of Shields Avenue in Fresno was the Fig Garden district (roughly 4 miles northwest of the FAT), a rural estate subdivision. After the war, Fresno initially gave priority to housing needs for returning veterans and constructed public housing for them near the new Veterans Hospital in East Fresno. However, it was not long before developers began subdividing and building tract homes on large tracts of land north of Shields Avenue, expanding the City outward. In the 1950s, there was significant growth in residential development, which was typically built near new shopping centers, schools, and office parks developing outside of the traditional downtown commercial and urban center.

A lack of housing was not the only problem that Fresno faced in the postwar years. The streets, water system, and sewer system were all inadequate to support the number of people dependent on them. By the 1950s, the Fresno-Clovis metropolitan area was growing faster than the City of Fresno, putting a strain on the County facilities as well. There was a general outcry for a more thoughtful and well-managed approach to growth. In 1956, the Fresno-Clovis Area Planning Commission was formed and was charged with preparing a general plan for the area. That same year, the Fresno City Commission formed the redevelopment agency to address problems in the inner city. Other programs initiated in the postwar years included the adoption of Fresno's uniform zoning ordinance (1960), a building code, street improvement standards, and redevelopment and neighborhood plans for various areas. In 1969, the Council of Fresno County Governments (COFCG) was established to provide intergovernmental highway planning and prepare regional plans and programs.

The ability to connect Fresno with other nearby cities, as well as larger metropolitan areas such as San Francisco and Los Angeles, was an important factor in the City's continued growth. Expansion of north-south State Routes 99 and 41, along with east-west State Routes 168 and 180, was supported as part of this regional connection program. More locally, commercial corridors such as Blackstone and Shaw Avenues created links between the urban and suburban parts of the City and were direct links to developing neighborhoods and shopping centers. However, while the City was growing outward its core was dying.

To address the problem of the depressed downtown core, in 1958 the City hired the firm of Victor Gruen and Associates to develop an urban renewal plan. The result was one of the most imaginative urban renewal plans of the period. The centerpiece of the plan was a six-block pedestrian mall and urban park designed by renowned landscape architect Garret Eckbo. Fulton Street was formerly the main shopping street in downtown Fresno but had fallen into a depressed economic state and was part of the decline of Fresno's downtown. Dedicated on September 1, 1964, Fulton Mall excluded vehicular traffic and was a mix of softscape (trees and plants) and hardscape (concrete, rock, wood, and metal). It included gardens, water features, benches, playgrounds, modern sculpture, and ceramics. At the time it opened, it was well received and nationally recognized. Initially, it appeared to solve the problem of blight in Fresno's downtown, but it suffered when Fashion Fair Mall opened 6 miles to the north in 1970; by the 1980s, most of the businesses along Fulton Mall had closed (Anonymous 2023a). In 2017, car traffic was reintroduced and many of the public amenities were removed or relocated to the sidewalks (Ibid.).

Since the 1980s, Fresno has continued to grow. It has an area of approximately 116 square miles and, as of 2020, a population of approximately 542,000 (Anonymous 2023a). It is home to more

than 70 ethnic groups, and Fresno County is ranked first in the nation for agricultural production (City of Fresno 2023b).

### Fresno Yosemite International Airport

Fresno Yosemite International Airport started out as Hammer Field. Located east of the Fresno city limits, the base was built in 1941 and leased to the Army Air Corps (Planning Resource Associates, Inc. 2008). It was named Hammer Field in honor of “Lieutenant Earl M. Hammer of San Francisco, the first California member of the army flying service to be killed in action” during World War I (*Fresno Bee* 1942). During WWII, Hammer Field was important as a training facility for night flying and aviation technicians (Suzassippi 2023). In 1946, the War Assets Administration reallocated Hammer Field to the City of Fresno, which planned to use the facility as a commercial airport (Anonymous 2023b). Construction of a passenger terminal on the northeast side of the airfield began almost immediately (*Ibid.*). The Fresno Airport Terminal opened in 1948 and flights to Los Angeles and San Francisco/Oakland were available via Trans World Airlines (TWA) and United Airlines (*Ibid.*). In the 1950s, the California Air National Guard moved to the airport and established the Fresno Air National Guard Base in the southeast corner of the airport (*Ibid.*). To accommodate the guard, a second, parallel runway was constructed in 1956 (Kimley Horn 2017).

In January 1957, it was announced that the final plans for the Fresno Air Terminal expansion program would be explained to a city commission (*Fresno Bee* 1957a). According to airport superintendent Wilmer J. Garrett, when completed, the \$2,085,000 project would allow the airport “to handle anything from helicopters to huge commercial jet airliners” (*Ibid.*). The news article reported that the runway surface was constructed to stand at least 120,000 pounds of pressure and the 8,600-foot concrete runway would easily handle jetliners; it was noted that military aircraft, including a six engine B47 intercontinental bomber, had already landed at the airport (*Ibid.*). In addition to the aircraft facilities, the new passenger terminal would have nine passenger loading gates and be more than three times the size of the existing terminal (*Ibid.*).

In February 1959, Congressman B.F. Sisk of Fresno testified in support of a bill to raise the annual federal airport grants from \$63,000,000 to \$95,000,000 and told the House Interstate and Foreign Commerce Committee that Fresno’s \$4,000,000 airport improvement plan merited federal support (*Fresno Bee* 1959a). Sisk also stated that the Fresno airport served six counties and 800,000 people and was an alternative landing site for jets (*Ibid.*). In May 1959, Airport Superintendent Garrett announced that the airport had received an additional \$100,000 in federal funding bringing the total to \$774,183 (*Fresno Bee* 1959b). This amount, plus other funds already in hand, was enough for the airport to move forward with and complete construction of five buildings: a new terminal building, a concourse, a maintenance building (in the APE), a new control tower (in the APE), and a new fire house (in the APE) (*Ibid.*). In June 1959, it was announced that the City would be accepting bids for the construction of the five buildings at the Fresno airport (*Fresno Bee* 1959d). The buildings were all designed by local architect Allen Y. Lew over a 2.5-year period (*Ibid.*). The estimated cost for the construction was approximately \$1,800,000 (*Ibid.*). In December 1959, Garrett reported that despite the steel strike, construction of the terminal and control tower buildings was progressing (*Fresno Bee* 1959c). The article reported that “huge steel girders which will form the base of the control tower are in place below ground level” and the passenger tunnel to the concourse was nearing completion (*Fresno Bee* 1959c).

In May 1961, City and federal officials inspected the new, 88-foot-7-inch-tall tower building (*Fresno Bee* 1961a). The tower was expected to be in service at the beginning of September 1961 when the new passenger terminal with an open-air concourse and ground level boarding gates were scheduled to be completed (Ibid.; Kimley Horn 2017). A news article in July 1961 announced that the seven-story control tower had its first tenant: Airport Superintendent Wilmar J. Garrett and staff (*Fresno Bee* 1961b).

In March 1962, a multi-page advertisement was printed for the Fresno Air Terminal dedication. The ad provided a wealth of information about the new \$3,800,000 Fresno Air Terminal facility, which was reportedly paid for with “the retirement of airport revenue bonds, repayment to other city funds, and grants-in-aid from the Federal Government” (*Fresno Bee* 1962a:14-A). The total area occupied by the facility was 1,321 acres and the “between-runways land use program directs a 417-acre cotton allotment [that] adds \$15,000.00 net income to the city per year” (*Fresno Bee* 1962a:16-A). The one-story terminal building had 43,800 square feet of interior floor space and, in addition to the standard terminal functions, it included a dining room, a round cocktail lounge, a coffee shop, a news and gift shop, car rental facilities, and a barber shop (*Fresno Bee* 1962a:14-A). The ad also noted that the “seven story Government Agency Building houses the Federal Aviation Agency Control Tower, the Flight Service Station, Safety Standards Office, Systems Maintenance Sector, United States Weather Bureau, and the Airport Management Offices” (*Fresno Bee* 1962a:14-A). Allen Y. Lew was prominently listed as the architect of the new facility (Ibid.).

In 1978, a concourse addition was completed and, in 1986, the baggage claim area was remodeled and expanded (Kimley Horn 2017). In 1993, a \$6 million airport remodeling project was completed (*Fresno Bee* 1993a). A news article reported that this was the first major work done on the main terminal since 1962 and included a waterfall, chunky pillars, and a neon-lighted time-and-temperature canopy (Ibid.). In addition, the tunnel and escalator were replaced with a welcoming-level corridor and a section inside the lobby was removed to create an open expanse (Ibid.). In addition to updating the terminal, the remodel project removed asbestos materials and brought the terminal into compliance with the Americans with Disabilities Act (ADA) (Ibid.). Allen Y. Lew and William E. Patnaude, Inc. did the design work for the project (Ibid.). Although a number of terminal remodeling and expansion projects have been completed since 1993, the exterior of the ATCT does not appear to have been changed (Kimley Horn 2017).

## Airport Traffic Control Towers<sup>2</sup>

Federal responsibility for air traffic control began in 1936, but it was not until 1941, that the Civil Aeronautics Administration (which was dissolved with the creation of the FAA in 1958) began operating ATCTs. With continued growth in the nation’s airspace in the mid-late 20<sup>th</sup> century, it quickly became evident that airport safety and capacity had to be increased to prevent system delays. Between mid-1959 and mid-1969, the number of aircraft operations at FAA’s ATCTs had

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<sup>2</sup> Except where noted, the information in this section has been excerpted and condensed from *Bipartisan Infrastructure Law (BIL) Airport Traffic Control Tower (ATCT) Replacement Program, Programmatic Environmental Assessment, September 2023 (FAA 2023)*. Although this document is specific to FAA-owned ATCTs and does not apply to the Fresno ATCT, it is useful for understanding the evolution of ATCTs.

increased by 112 percent. By 1966, the FAA had commissioned the nation's 30<sup>th</sup> ATCT at Hillsboro, Oregon.

Prior to the 1960s, there were more than 500 unique FAA ATCT and Terminal Radar Approach Control facilities at airports located atop and collocated with airport terminal buildings. However, the early 1960s ushered in a period of architectural change for the federal government and the nation's airports (Glover 2020). "President John F. Kennedy wanted federal buildings that showed 'the dignity, enterprise, vigor and stability of the American national government,' and Congress wanted the FAA, rather than local communities, to build air traffic control towers" (Ibid.).

Starting in the mid-1960s, the FAA began implementing repeatable standard designs for ATCTs. Until 1961, the facilities were unique one-off facilities. The introduction of standard designs heralded a change in design philosophy for ATCTs with the standard ATCTs being a stand-alone building apart from the airport terminal building. The new standard designs were to serve as a uniform symbol of air safety in airports.

In 1961, an Art in Aviation Advisors Committee was appointed to advise the FAA on a program for designing towers that were pieces of architecture, as well as machinery designed as a standard unit to be used anywhere (Glover 2020). This would enable one architect to work with one engineer resulting in economy and a well-designed tower (Ibid.). Several notable architects were invited to participate in a design competition. I.M. Pei headed the firm that was chosen by the committee to design standard ATCTs. The design of ATCTs consisted of a cab and shaft in a nondirectional pentagon shape for visuals on all sides and a base building.

The creation of ATCT design types also corresponded with the advent of computer technology in the early 1960s, which transformed the capabilities of air traffic control. Throughout the 1960s and into the 1970s, the FAA worked to develop, and by the mid-1970s succeeded, in creating automation programs, using both ground and airborne radar data, for air traffic control. This placed the United States airspace system on the leading edge of technology. By the late 20<sup>th</sup> century, the FAA upgrades added safety features and worked to stay abreast of expanding traffic volume.

In the 1960s and 1970s, the FAA built several towers using the Pei firm's ATCT design. Some of those are still in use today (2023). The FAA noted the significance of the prototype Pei tower in Chicago in the 2005 O'Hare modernization Environmental Impact Statement (EIS). Despite being less than 50 years of age at the time (2005), the FAA identified the tower as potentially eligible for listing in the National Register because it represents the work of a master and was a prototype that achieved exceptional importance in global airport design. Another notable ATCT type is the Welton Becket ATCT design type, by the firm of Welton Becket and Associates, used by the FAA from 1974 to 2007.

Since the 1960s, there have been 12 unique standard FAA ATCT design types (refer to Table A).



**Table A: ATCT Standard Design Types**

ATCT Design Type	Commission Years	Number of ATCTs
Type O	1965–1968	26
Pei	1966–1976	15
Type L	1966–1969	4
Hunt/AVCO	1967–2000	84
Mock	1969–1987	23
Welton Becket	1974–2007	24
Golemon & Rolfe	1980–2007	35
Leo Daly/HNTB LAL	1987–2008	19
Leo Daly MAL	1992–2003	14
Leo Daly/HNTB IAL	2002–2014	4
Radian/2006 LAL	2002–2014	19
Radian/2006 IAL	2002–2016	4

Source: Federal Aviation Administration (2023).

ATCT = Airport Traffic Control Tower

IAL = Intermediate Activity Level

LAL = Low Activity Level

MAL = Major Activity Level

### Allen Y. Lew, FAIA

Allen Yuen Lew was born in the Chinatown area of Fresno in 1912 and graduated from Fresno High School in 1931 before earning a degree from the University of California, Berkeley in 1935 (AIA 1953; *Fresno Bee* 1962c and 1993b; Patnaude 2023). After college, he worked as a draftsman for David H. Horn (1936–1937) and Franklin & Kump (1937–1940) (Ibid.). From 1941 to 1944, Lew worked for Douglas Aircraft in Los Angeles and was a partner in the general contracting firm Lew and Lamber in Fresno from 1944 to 1951 (Ibid.). In 1952, he obtained his State registration in architecture and began practicing in Fresno (Ibid.). In 1953, he applied for and was granted individual and corporate memberships in the AIA (Ibid.).

In April 1962, just a few weeks after the dedication of the new Fresno Air Terminal, Lew won “the first Award For Excellence In Design to be presented by the San Joaquin chapter of the American Institute of Architects” (see Figures 4 and 5; *Fresno Bee* 1962b). The award was for his design of the “Air Terminal Building and Tower Structure” (see Figure 5). The terminal and ATCT, which share a Mid-Century Modern design aesthetic, were the two most architecturally interesting buildings of the five that Lew designed for the FAT at that time (see Figures 6, 7, 8, and 9).



FOR EXCELLENCE—Edwin S. Darden, left, presents an award to architect Allen Y. Lew for his design of the new Fresno Air Terminal buildings.

**Figure 4: Lew Accepting the Award for Excellence in Design (*Fresno Bee* 1962b).**



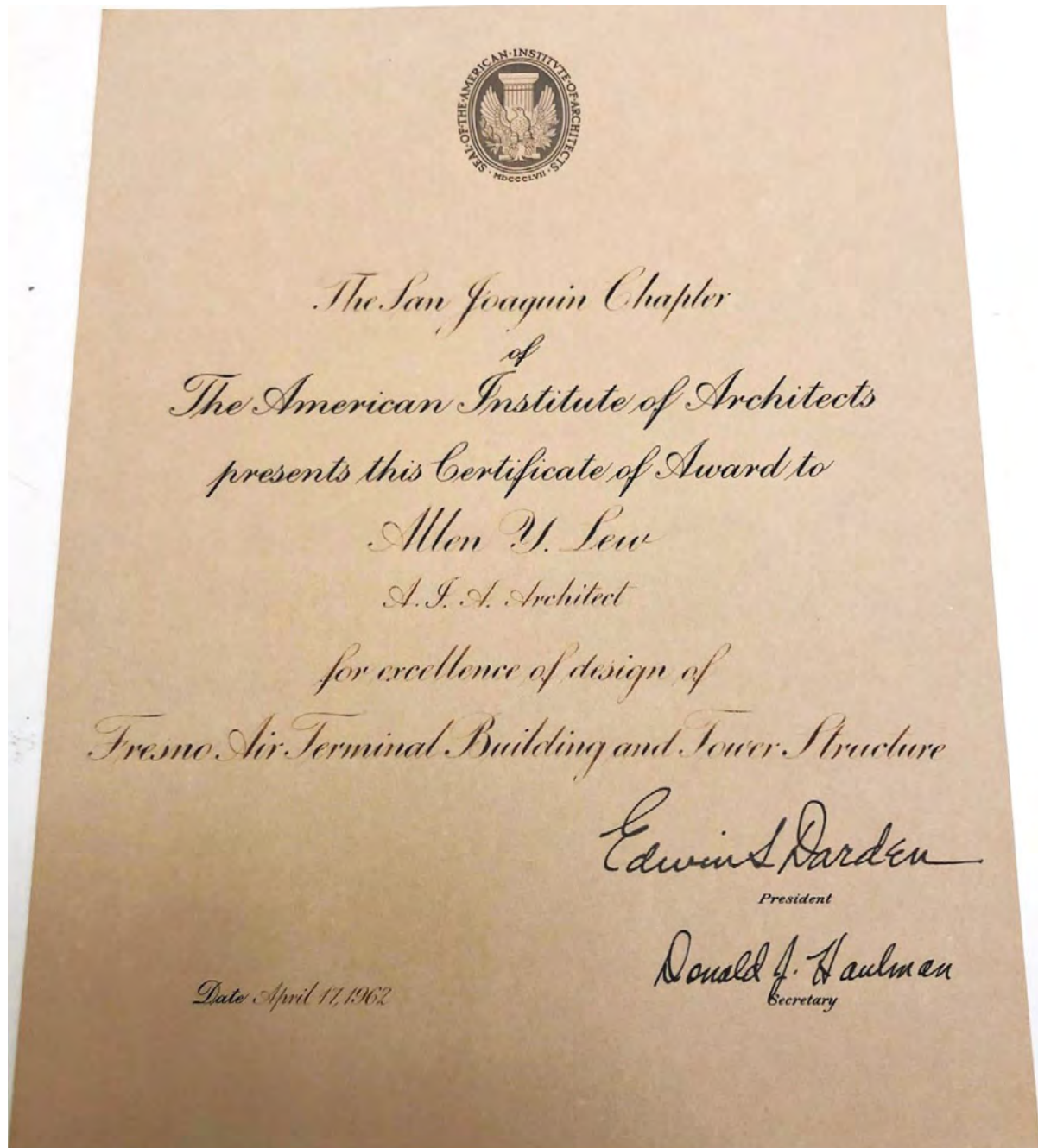


Figure 5: 1962 Award Certificate (Powell 2023).



Figure 6: Fresno Air Terminal circa 1962 (Moore 2023).



Figure 7: FAT Terminal Building circa 1962 (Moore 2023). Note the similarity of the fenestration rhythm to that of the ATCT.



**Figure 8: ATCT circa 1962 (Moore 2023).**



**Figure 9: FAT Terminal Interior with View of ATCT (Moore 2023).**



Later in 1962, Lew received another award of excellence from the AIA for the Chinese Confucius Church at West Tulare Street and Waterman Avenue in Fresno (*Fresno Bee* 1962c). “Lew combined the strict, simple Oriental lines with modern American materials which give the building both a contemporary feeling and an Oriental look for identification with its use” (*Fresno Bee* 1962c:19-F).

Lew designed a number of apartment complexes including 48 garden apartments on nearly 3 acres on Huntington Boulevard (1968) and the Huntington Holmes Redevelopment Company project that included 76 two- and three-bedroom apartment units (Planning Resources Associates, Inc. 2008). The latter was a 1.2-million-dollar development (*Ibid.*).

In 1971, Mr. Lew was nominated by the San Joaquin Chapter of the AIA for membership in the AIA College of Fellows for “his outstanding Achievement in Design and, particularly, in Public Service, as well as his substantial contribution in Service to the Profession” (AIA 1972:2). The nomination also stated that “Mr. Lew’s creative ability in Design has set a standard of excellence which has had a profound influence on both his fellow architects and fellow citizens in his area. His work has won many awards, including three awards of excellence, two awards of honor and one award of merit. Projects so honored include an Air Terminal, a Church, a Public Library, an Apartment complex, and a Residence. His solutions to these complex projects with its air of simplicity and restraint has been his outstanding stamp of achievement” (*Ibid.*). The nomination included photographs of the following buildings that provided “the ultimate evidence of Mr. Lew’s creativity and special talent in Design”: Chinese Confucius Church (1962); Fresno Air Terminal Building (1962); Sanger Library (1967); Huntington Holmes Apartments (1967); Lew Residence (1967); and Fresno State College, College Union (1969) (AIA 1972).

In 1972, Mr. Lew was admitted to the AIA College of Fellows by a jury of his peers for his “notable contribution to the advancement of the profession of architecture” (AIA 1972). “AIA Fellows are recognized with AIA’s highest membership honor for their exceptional work and contributions to architecture and society” (AIA n.d.). In 1985, he applied for and was granted Membership Emeritus status (AIA 1985). Two years later (1987), the firm of Allen Y. Lew & William E. Patnaude Inc. won a Merit award certificate from the Masonry Institute of Fresno for the enlisted personnel housing at the Lemoor Naval Air Station (*Fresno Bee* 1987).

In addition to his achievements in the field of architecture, Mr. Lew was also actively involved in the community and various organizations. He was a member of the Fresno Planning Commission and the Redevelopment Agency and a leading advocate for the plan to revitalize the downtown business and civic center including the award-winning pedestrian mall (AIA 1972). He was a member of the Chinese Benevolent Association, the Fay Wah Club of Fresno, the West Fresno Rotary Club, Boy Scouts of America, the Fresno County and City Chamber of Commerce, the Commonwealth Club, and Chinese-American Citizen Alliance (*Fresno Bee* 1962c and 1993b; AIA 1972). “Mr. Lew’s contribution to the planning of the Chinese Community Center with its churches, schools and clubhouse formed the nucleus of a continuing contribution of the Chinese cultures to the residents of the city of his birth” (AIA 1972:2a). He was also president, secretary, treasurer, and director of the San Joaquin Valley AIA and director, treasurer, and chairman of various committees of the California Council of the AIA (*Fresno Bee* 1962c.; AIA 1972). He was appointed by the Governor of California to serve a term on the original board of the Designers Qualifications Advisory Committee under the umbrella of the California Board of Architectural Examiners (AIA 1972).

Allen Y. Lew died in January 1993 at age 80 (*Fresno Bee* 1993b). According to his obituary, Mr. Lew's "architectural designs were noted for their creativity, simplicity and restraint" (*Fresno Bee* 1993b). Local historian Joe Moore echoed this. He stated that Lew's work, which was typically rectilinear and low-slung, emphasized vertical elements and often used bands of vertical glazing between walls of stucco, brick, metal or aggregate concrete. "This helped bring in natural light while limiting solar gain in Fresno's hot summers" (Moore 2023). Mr. Moore further stated that the ATCT is a good, seemingly intact example of Lew's work and is also unusual in that it is not low-slung (Moore 2023). Former Fresno architectural historian John Edward Powell stated that the ATCT "handsomely reflects the Mid-Century Modern tradition" and "remains exemplary of its idiom" (Powell 2023). Matthew Patnaude characterized Lew as an important architect who is generally underrated and overlooked especially considering the obstacles he faced as a Chinese-American (Patnaude 2023). He remembered that even in the 1960s, Mr. Lew faced racial challenges and that he designed and built his award-winning residence (1963) after being subjected to redlining (this was not verified). He noted that Lew always incorporated a bit of his Chinese heritage into his designs, most notably in the way he considered the effects of not just sunlight, but also moonlight in his projects (Ibid.). The Mid-Century Modernism Historic Context prepared for the City of Fresno in 2008, lists Lew as one of about 30 practitioners of Modernism in Fresno (Planning Resources Associates, Inc. 2008).

### International Style

The ATCT is an example of the International style of architecture. This minimalist style falls under the broad category of Modernism. It is generally devoid of regional characteristics and decorative elements (Harris 2006). It evolved mainly from the 1920s–1930s Bauhaus interdisciplinary design school in Germany and migrated to the United States with some of the German architects who relocated here during the Depression era. The style garnered interest in America around 1932 when the Museum of Modern Art featured a "Modern Architecture" exhibit highlighting buildings from around the world that shared a stark simplicity and vigorous functionalism (Christopher A. Joseph & Associates 2009:14). Henry Russell Hitchcock and Philip Johnson coined the term International Style in their catalog for the exhibit (Ibid.).

The first major example of the style in the United States was the 1932 Philadelphia Savings Fund Society Building designed by George Howe and Swiss-born, William Lescaze (Christopher A. Joseph & Associates 2009). In southern California, the first truly International style building was Columbia Square (1938) by Lescaze and E.T. Heitschmidt (Ibid.). Rudolph Schindler and Richard Neutra are two other master architects who worked extensively in southern California and are known for their International style residential and commercial designs as early as the 1930s and 1940s.

In the post-WWII years, acceptance of the style grew and became popular for larger non-residential projects. Two trends emerged, both based on philosophies associated with Bauhaus leaders Walter Gropius and Mies van der Rohe (Christopher A. Joseph & Associates 2009). The Gropius-influenced trend focused on expressing the building's function and featured screen walls, steel frames, and external glass walls without interruption (Ibid.). The Miesian-influenced trend reflected a "less is more" aesthetic that typically followed one of three subtypes: glass curtain wall skyscrapers, glass and steel pavilions, or the modular office building (Ibid.). However, both trends share several character-defining features:

- Simple geometric forms often rectilinear;
- Balance and regularity, but not necessarily symmetry;
- Reinforced concrete and steel construction with a non-structural skin;
- Unadorned, smooth wall surfaces typically of glass, steel, or stucco painted white;
- Complete absence of ornamentation and decoration;
- Often cantilevered upper floor or balcony;
- Flat roof without a ledge or eaves;
- Large areas of glass; and
- Metal window frames set flush with the exterior walls, often in horizontal bands.

In Fresno, “Ernest Kump, Jr. was a significant practitioner of the International style” (Planning Resources Associates, Inc. 2008:69). Allen Lew worked for Franklin & Kump from 1937 to 1940. Some examples of the International style in Fresno include the Fresno City Hall Annex, Fresno Unified School District office, Roosevelt High School auditorium and cafeteria buildings, the Fresno State steam power plant, and the Berkeley’s Building (Ibid.).

### Previous Studies

A review of the OHP Built Environment Resources Database (BERD), revealed that several Hammer Field/Fresno Army Airbase buildings, located at 5175 East Clinton Way within the FAT property, were evaluated in 2012 as not eligible for listing in the National Register by consensus through the Section 106 process. In 2013, a number of buildings associated with the Marine Corps Reserve Training Center, located at 5315 East Cassino Avenue within the FAT property northeast of the runways, were also evaluated as not eligible for listing in the National Register by consensus through the Section 106 process. No other buildings associated with the FAT were listed in the BERD. No listing for the FAT was found in the National Register database.

## FIELD SURVEYS

### Archaeological Survey

As the APE is completely paved/landscaped or otherwise heavily disturbed (from 5 to 25 feet in depth), there is no potential for in situ archaeological resources so it was determined that an archaeological survey would not be productive.

### Architectural Survey

During the architectural field survey three historic-period buildings were identified in the APE. They are described below.

#### *Airport Traffic Control Tower*

The International style ATCT building consists of an approximately 8,500-square-foot, one-story building with a nearly square, six-story tower (see Photos 1–5). The tower is slightly off-center and has an approximately 1,090-square-foot footprint. The one-story building and the tower both have flat roofs with no eaves. The exterior walls consist of a combination of scored, stucco-covered concrete, glass, blue polyethylene panels, and slightly green aggregate panels. All of the windows, doors, sidelights, transoms, and polyethylene panels are metal-framed. A galvanized pipe rail

secures the area around the cab on top of the tower. Fences prohibit access to all but the southwest elevation of the building.

**Southwest Elevation.** This elevation faces an adjacent parking lot and is the most understated of the four elevations (see Photo 1). From left to right, the one-story portion of this elevation includes: eight stuccoed panels and an accent of three metal posts that extend above the roof; four vertical-rectangular, windows with blue polyethylene panels above and below; and a recessed section (described in more detail below) that includes the primary entrance and a solid metal door topped by a transom and a blue polyethylene panel. The remainder of the elevation has greenish-colored aggregate panels, stuccoed panels, and two more metal post accents.



**Photo 1: Southwest elevation, view northeast (9/11/23).**

The recessed primary entrance has a glass door and windows, sidelights, and transoms all topped by a horizontal band of three, blue polyethylene panels. The entrance is sheltered under the flat roof of the building, and there is a dedication plaque on the west wall and a three-metal post accent attached to the fascia east of the entrance. The remainder of the recessed section has four rectangular cutouts in the roof to allow natural light above the metal door, which leads to an interior stairwell. The cutout part of the roof is supported by two aluminum trim columns. Together, the cutouts are approximately the width of the tower, which extends above them. This section is also accented by greenish-colored aggregate panels, which extend up and around the sides of the tower.

The tower portion of the southwest elevation is characterized by 91 (7 over 13) greenish-colored aggregate panels and an off-center, vertical stripe of alternating windows and blue polyethylene panels that extend above the stairwell door to the top of the tower. The windows consist of narrow, vertical, metal slats that are angled and have an opaque appearance. Both corners of the tower have full-height, aluminum trim. The cab on top of the tower has large, angled, tinted windows above blue polyethylene panels and a flat roof.

**Southeast Elevation.** The southeast (side) elevation is adjacent to the maintenance building (see Photo 2). The one-story portion of the elevation, from left to right, includes: four stuccoed panels; a glass door below a very small metal awning and flanked by sidelights; two stuccoed panels; and a ribbon of eight, vertical-rectangular windows with blue polyethylene panels above and below. The metal awning above the door is flanked by blue polyethylene panels and above them is a ribbon of three windows topped by a ribbon of three blue polyethylene panels.



Photo 2: Southeast elevation, view northwest (9/11/23).



The southeast elevation of the tower has 44 (4 over 11) greenish-colored aggregate panels and alternating bands of six sliding windows and six blue polyethylene panels. Both corners of the building have full-height aluminum trim. There are metal vents at the bottom of each of the panels in the first column, except for the top panel. It appears that an additional vent was added to the top of one of the panels and one of the windows has been filled in to accommodate a wall-mounted air conditioning unit. The southeast elevation of the cab has angled windows above blue polyethylene panels.

**Northeast Elevation.** The northeast (rear) elevation faces the runways (see Photos 3 and 4). The one-story portion of the building is generally characterized by a row of blue polyethylene panels above and below vertical-rectangular and horizontal-rectangular windows of varying sizes. However, there are four, large, fixed windows east of the doors that only have panels above them. There are three, metal, pole accents, identical to the ones on the southwest elevation. The entrance consists of a pair of glass doors. A thin metal canopy shelters the doors and extends northwest over the windows, ending where the elevation consists of stuccoed panels. A chain-link fence secures the doors and the adjacent landscaped area to the northwest and wraps around a portion of the northwest (side) elevation.

The tower portion of this elevation has 11 alternating rows of blue polyethylene panels (eight per row) and sliding windows (eight per row). Both corners of the building have full-height aluminum trim. The northeast elevation of the cab has three, angled windows above blue polyethylene panels.



Photo 3: Northeast elevation, view southwest (9/11/23).



**Photo 4: Northeast elevation, view south (9/11/23).**

**Northwest Elevation.** The northwest (side) elevation faces a landscaped area and a small parking area (see Photo 5). The northwest corner of this elevation is partially obscured from view by a privacy fence. The one-story portion of the building has, from left to right: what appears to be two, vertical-rectangular windows with blue polyethylene panels above and below; a window with a transom and blue polyethylene panel above; a glass door with a transom and a blue polyethylene panel above; a slanted, metal canopy above the window and door; six, full-height, stuccoed panels; a ribbon of four, vertical-rectangular windows with blue polyethylene panels above and below; and two, full-height, stuccoed panels.

The tower portion of this elevation has 11 alternating rows of six blue polyethylene panels and six sliding windows and 44 (4 over 11) greenish, aggregate panels. Both corners of the building have full-height aluminum trim. One of the windows has been filled in to accommodate an air conditioning unit and one of the top aggregate panels has a metal vent that may be an alteration. The cab has three, fixed, angled windows above three, polyethylene panels.

Overall, the ATCT appears to have only a few, minor alterations consisting of two vents and two air conditioning units on the side elevations.



**Photo 5: Northwest (side) elevation, view southeast (9/11/23).**

#### *Aircraft Rescue and Fire Fighting Facility (ARFF)*

The one-story ARFF is situated southeast of the ATCT (see Photos 6–11). It is roughly shaped like a lowercase T and has a multi-level, flat roof with parapets. The central bay has concrete block walls, and the other bays have stucco-covered walls with narrow, vertical accents flanking the windows. Fenestration appears to consist of modern, vinyl sliding windows. The central bay, which features two garage doors in the southeast elevation, is larger and taller than the other two bays which appear to house offices. This is a secured facility and only the southwest end of the building is clearly visible from the public right-of-way (ROW) (i.e., East Andersen Avenue).

**Southwest Elevation.** The southwest elevation faces the adjacent parking lot (see Photos 6 and 7). The northeast and central parts of this elevation are obscured from view by vegetation and an articulated and perforated concrete block screen wall that forms an enclosed, rectangular patio area in front of the central bay. There appears to be a freestanding, flat-roofed patio cover inside the screen wall. The southwest end of the elevation has two, horizontal-rectangular ribbon windows that are obscured from view by metal security bars.

Although the building is utilitarian and non-descript, when viewed from the parking lot, the screen wall coupled with the multi-level flat roof and smooth exterior walls give the impression of a Mid-Century Modern design aesthetic.





Photo 6: Northwest elevation (adjacent to parking lot), view southeast (9/11/23).



Photo 7: Northwest elevation, view northeast (9/11/23).

**Southwest Elevation.** The southwest elevation is the only elevation that is clearly visible from the public ROW (i.e., East Andersen Avenue). It is adjacent to a large area landscaped with grass and trees. It has a single door and several narrow, vertical accents (see Photo 8).

**Southeast Elevation.** The southeast elevation faces the airport terminal building (see Photo 9). It includes four pairs of vinyl-framed sliding and fixed windows separated by narrow vertical accents in the southeast bay, a pair of garage doors in the central bay, and, in the northwest bay, a door and a pair of vinyl-framed windows beneath a pent roof awning and a pair of vinyl-framed sliding windows. Narrow, vertical accents flank the door and windows.



Photo 8: Southwest elevation (facing E. Andersen Avenue), view northeast (7/30/24).



**Photo 9: Southeast elevation (faces the Terminal), view northwest (7/30/24).**

**Northeast Elevation.** The northeast elevation faces a freestanding, prefabricated shade structure/carport and a maintenance building. This elevation has a horizontal-rectangular ribbon window and a small vinyl-framed sliding window (see Photos 10 and 11). Similar to the other elevations, it also has narrow, vertical accents.



**Photo 10: Northeast elevation, view southwest (7/30/24).**



**Photo 11: Northeast elevation, view southeast (7/30/24).**

### *Maintenance Building*

The one-story maintenance building is southeast of the ATCT (see Photo 12). It is not visible from the public ROW and is only minimally visible from the parking lot southwest of the ATCT. The building is rectangular in plan and has a flat roof with a slightly projecting fascia. Although otherwise nondescript, the building features exterior walls with large, articulated panels and metal pole accents similar to those found on the ATCT.

The nearly symmetrical southwest (rear) elevation has a pair of metal doors set flush with the wall, three metal pole accents, a horizontal band of windows set high in the wall, and another group of three metal pole accents. The southeast (end) elevation has two bay doors. The northwest elevation, facing the runway, has three metal pole accents, a single window below a ribbon of windows set high in the wall with an air conditioning unit in one, a single door, three garage doors, what appear to be vents, and three metal pole accents. The northwest (end) elevation has what appears to be a large vent.





**Photo 12: Northeast elevation (faces runway), view southwest (9/11/23).**

## SIGNIFICANCE EVALUATION

Based on the research results discussed above, the following sections present the historical significance evaluation of the FAT ATCT, ARFF, and maintenance building and the conclusion on whether any qualifies as a “historic property” pursuant to Section 106 of the NHPA or a “historical resource” as defined by CEQA.

### DEFINITIONS

#### National Register of Historic Places

The National Register criteria for evaluation exclude properties that are less than 50 years old unless they are of exceptional importance. “Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places” (National Park Service 1995:41). In addition to meeting at least one of the National Register criteria, “historic properties must retain integrity. Within the concept of integrity, the National Register criteria recognize seven aspects or qualities that, in various combinations, define integrity” (National Park Service 1995:44). These are: location, design, setting, materials, workmanship, feeling, and association (discussed in more detail below). “To retain integrity a property will always possess several, and usually most, of the aspects” (Ibid.). Guidance for applying the National Register criteria is provided in National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation.

Pursuant to 36 CFR Part 60.4, the quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

- A. It is associated with events that have made a significant contribution to the broad patterns of our history;
- B. It is associated with the lives of persons significant in our past;
- C. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values, or that represent a significant and distinguishable entity whose components lack individual distinction; and/or
- D. It has yielded, or may be likely to yield, information important to prehistory or history.

“Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they” meet certain criteria considerations (National Park Service 1995:2). The resource associated with this Project does not fall into these categories; therefore, these criteria considerations are not discussed further.

## California Register of Historical Resources

The California Register criteria are based on National Register criteria and also typically require that a resource be 50 years of age or older in order to be considered for historical significance. The integrity of the resource, using the seven aspects of integrity discussed below, must also be taken into consideration. "It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register" (OHP 1999).

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register (Public Resources Code, 5024.1, Title 14 CCR, Section 14 CCR, Section 4852) including the following:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the Nation.

## City of Fresno Historic Preservation Ordinance

Criteria for the City of Fresno Historic Resource designation are based on the California Register criteria. The criteria also require a resource to be more than 50 years old and retain enough integrity to convey its significance (Article 16, Section 12-1607):

(a) HISTORIC RESOURCES: Any building, structure, object or site may be designated as an Historic Resource if it is found by the Commission and Council to meet the following criteria:

- (1) It has been in existence more than fifty years, and it possesses aspects of integrity to convey its significance based upon location, design, setting, materials, workmanship, feeling or association, and:
  - (i) It is associated with events that have made a significant contribution to the broad patterns of our history; or
  - (ii) It is associated with the lives of persons significant in our past; or

- (iii) It embodies the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values; or
- (iv) It has yielded or may be likely to yield, information important in prehistory or history.

## EVALUATION

In summary, the APE is developed with the FAT ATCT, the ARFF facility, a maintenance building, a parking lot, and a landscaped area. These buildings were among the first five buildings built at the airport in the early 1960s, all of which were designed by master architect and Fresno native Allen Y. Lew, Fellow of the American Institute of Architects (FAIA). The ARFF facility and maintenance building are both relatively nondescript and utilitarian. The ATCT was designed in the International style and was completed in 1961. A review of the original design plans revealed that it has sustained only a few minor alterations. In 1962, Lew won the first Award for Excellence in Design given by the San Joaquin Valley Chapter of the AIA for the FAT terminal building and tower structure. In addition to winning a number of awards for his work, Mr. Lew was notable for his contributions to the community through his involvement on the local Planning Commission and Redevelopment Agency and his participation in numerous civic organizations.

### Significance

The buildings are evaluated below for historical significance under the criteria for listing in the National Register of Historic Places and the California Register of Historical Resources and for designation under the City's ordinance. Because all three sets of criteria are nearly identical, they have been grouped together to avoid redundancy. Refer to Appendix A for the Department of Parks and Recreation (DPR) 523 forms.

#### *Criteria A/1/1.i*

The ATCT, ARFF facility, and maintenance building were constructed in the post-WWII period, which was a time of extreme growth in California and most of the nation. During this period millions of new homes were built, along with supporting civic, commercial, and recreational amenities. The development and expansion of the FAT, including construction of the ATCT, ARFF facility, and maintenance building, were at least partially driven by the population surge in the San Joaquin Valley and the growing use of air transportation for business and recreational reasons. While the buildings are associated with this historically significant event (post-WWII boom), they did not play an important role in instigating, facilitating, or accelerating it. The buildings are not significant under these criteria.

#### *Criteria B/2/1.ii*

Research did not identify any historically significant people associated with any of these buildings. They are not significant under these criteria.



### *Criteria C/3/1.iii*

**Airport Traffic Control Tower:** The ATCT embodies many of the distinctive characteristics of the International style including its simple, rectilinear geometric form, concrete and steel construction, unadorned wall surfaces that are generally smooth, absence of ornamentation, flat roofs, large areas of glass, and bands of metal-framed windows that are flush with the exterior walls. It is a highly intact, representative example of the International style of architecture as applied to an airport traffic control tower. In addition, it is the work of master architect Allen Y. Lew, FAIA. In 1962, Lew won an Award for Excellence in Design for the FAT terminal building and tower structure. His 1971 nomination to the AIA College of Fellows was based on the work he did in the 1960s and specifically mentioned the airport in addition to noting that his solutions to complex projects had an air of simplicity and restraint that is his outstanding stamp of achievement. The ATCT is a good example of the simplicity and restraint that was the hallmark of his designs from that early period of his career. The ATCT is significant under these criteria.

**Aircraft Rescue and Fire Fighting Facility:** From the vantage point of the parking lot, the freestanding screen wall, coupled with the building's flat, multi-level roof and smooth wall surfaces, make the building appear to have a Mid-Century Modern aesthetic. However, this is essentially an illusion. Without this feature, the ARFF building is relatively non-descript and utilitarian and does not embody distinctive architectural characteristics. In addition, its integrity of materials, design, and workmanship has been compromised by replacement of most, if not all, of the windows. Although it is the work of a master architect, the focus is on function rather than style. It is an ancillary building that is not intended to be a focal point and was not included in the 1962 design award. The ARFF facility is not significant under these criteria.

**Maintenance Building:** The maintenance building is not representative of any architectural style. Although it incorporates the articulated panels and metal pole accents found on the ATCT, it is otherwise nondescript and utilitarian. It is the work of a master architect, but similar to the ARFF facility, the focus is on function rather than style. This is an ancillary building that was not intended to be a focal point and was not included in the 1962 design award. The maintenance building is not significant under these criteria.

### *Criteria D/4/1.iv*

The buildings were constructed in the post-WWII period using common methods and materials. They do not have the potential to yield new information related to prehistory or history. They are not significant under these criteria.

## **Character-Defining Features**

Based on the evaluation above, only the ATCT meets the criteria for historical significance; therefore, its integrity must be taken into consideration. In order to assess the integrity of the ATCT building, its essential physical features must be identified. These features, commonly called character-defining features (CDFs), are those that must be present in order for the building to represent or convey its significance (National Park Service 1995). The following have been identified as CDFs for the ATCT:

- Simple, rectilinear geometric forms of the horizontally oriented one-story portion of the building and the vertically oriented tower;
- Balance and regularity of design represented by the window and panel pattern on the one-story building and the alternating bands of windows and blue polyethylene panels, as well as the greenish aggregate panels on the tower;
- Cab with angled windows above blue polyethylene panels;
- Stucco and aggregate wall panels;
- Flat roofs without ledges or eaves; and
- Metal window and panel frames set flush with the exterior walls.

### Integrity

In order to qualify for listing in the National Register of Historic Places or the California Register or for designation under the City's ordinance, in addition to meeting one or more of the criteria discussed above, a resource must also retain enough integrity to convey its significance. The seven aspects of integrity are discussed below.

### Location

"Location is the place where the historic property was constructed" (National Park Service 1995:44). The ATCT is in its original location. The integrity of the location is high.

### Design

"Design is the combination of elements that create the form, plan, space, structure, and style of a property" (National Park Service 1995:44). A review of the original plans and drawings for the ATCT reveals that the design of the building has sustained only a few minor alterations (two vents and two, window-mounted air conditioning units) to the side elevations. The integrity of the design is high.

### Setting

"Setting is the physical environment of a historic property" (National Park Service 1995:45). The immediate setting consisting of the ATCT and adjacent parking lot, fire station, maintenance building, and hangars is relatively unchanged from 1961 when the building was first occupied. However, development within the larger airport facility has resulted in changes to the broader setting. These changes have minimized and/or changed views of the ATCT from the terminal and other public locations within the airport property. The integrity of the setting is moderate.

### Materials

"Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property" (National Park Service 1995:45). A review of the original plans and drawings for the ATCT reveals that the original materials

remain. There are only four very small places where the material has been changed to accommodate two window air conditioning units and two vents. The integrity of the materials is high.

### *Workmanship*

“Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory” (National Park Service 1995:45). Although the International style is characterized by simplicity in design and a lack of ornamentation, workmanship is evident in the way the aggregate panels, glass, and blue polyethylene panels are used together to create the overall design. The integrity of the workmanship is high.

### *Feeling*

“Feeling is a property’s expression of the aesthetic or historic sense of a particular period of time” (National Park Service 1995:45). The ATCT evokes a sense of stepping back in time to the glamorous age of air travel in the early post-WWII period. This is largely attributed to the International style of the building and its color palette, which features vibrant blue polyethylene panels and subtle green aggregate panels. The integrity of the feeling is high.

### *Association*

“Association is the direct link between an important historic event or person and a historic property” (National Park Service 1995:45). The ATCT retains its association with the FAT as it is still used as the ATCT for the airport. In addition, because it has sustained almost no exterior alterations, it also retains its association with master architect Allen Y. Lew, FAIA. The integrity of the association is high.

In summary, the FAT ATCT retains a high degree of integrity and meets the criteria for listing in the National Register of Historic Places and the California Register of Historical Resources and for designation as a Historic Resource under the City’s ordinance. It is significant under Criteria C/3/1.iii as a highly intact representative example of the International style of architecture as applied to an airport traffic control tower and as a good example of the work of master architect Allen Y. Lew, FAIA. Its period of significance is 1961, when it was first occupied.

## RECOMMENDATIONS

### BUILT ENVIRONMENT RESOURCES

The foregoing report has provided background information on the APE and surrounding area, outlined the methods used in the current study, and presented the results of the field survey and various avenues of research. As a result of these efforts, LSA recommends to the FAA and the City that neither the ARFF facility nor the maintenance building meet the criteria for listing in the National Register of Historic Places (National Register) or California Register of Historical Resources (California Register) or for designation under the Fresno Historic Preservation Ordinance. They are not “historic properties” for purposes of NEPA, including Section 106 of the NHPA, or “historical resources” under CEQA.

LSA also recommends to the FAA and the City that the FAT ATCT is eligible for listing in the National Register under Criterion C as a highly intact representative example of the International style of architecture as applied to an ATCT and as a good example of the work of master architect and Fresno native Allen Yuen Lew, FAIA. It also appears eligible for listing in the California Register under Criterion 3 and for designation as a Historic Resource under the Fresno Historic Preservation Ordinance for the same reasons. The period of significance is 1961, when the building was first occupied. The FAT ATCT is a “historic property” for the purposes of NEPA/Section 106 of the NHPA and a “historical resource” for the purposes of CEQA.

### Finding of Effect

Pursuant to Section 106 of the NHPA (36 CFR Part 800.5), an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Examples of adverse effects include, but are not limited to, physical destruction, alteration, relocation, change in the character of its use or features, introduction of visual, atmospheric or audible elements that diminish its integrity, and neglect that causes deterioration. Pursuant to Section 106, the proposed demolition of the ATCT would be an adverse effect to a historic property.

CEQA establishes that “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment” (PRC §21084.1). “Substantial adverse change,” according to PRC §5020.1(q), “means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.” Demolition will result in a substantial adverse change to a “historical resource” (i.e., the ATCT).

Since the ARFF facility and maintenance building are not “historic properties” under NEPA/Section 106 of the NHPA or “historical resources” pursuant to CEQA, the proposed undertaking will have No Effect/No Impact on either of them.



## ARCHAEOLOGICAL RESOURCES

The negative results of the records search and the level of disturbance (ranging from 5 to 25 feet in depth, which likely removed any subsurface resources from the APE) suggest a very low sensitivity for in situ archaeological resources. Therefore, no further investigation or archaeological monitoring are recommended.

In the event previously undocumented archaeological resources are identified during earthmoving activities, further work in the area should be halted until the nature and significance of the find can be assessed by a qualified archaeologist.

In the event human remains are encountered, State Health and Safety Code Section 7050.5. states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment.

## PROFESSIONAL QUALIFICATIONS

Ms. Tibbet has been practicing architectural history in southern and central California for 27 years. She has an M.A. in History/Historic Preservation from the University of California, Riverside. She meets the Secretary of the Interior's Professional Qualification Standards as a Historian and Architectural Historian.

Mr. Goodwin has more than 34 years of archaeological experience with both prehistoric and historic resources in northern, southern, and central California. He is a specialist in military sites and has participated in and directed many large and small projects. He received his B.A. in 1987 from San Diego State University and is a Registered Archaeologist (RA).

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- 1978b Northern Valley Yokuts. In *California*, edited by Robert F. Heizer, pp. 462–470. *Handbook of North American Indians*, volume 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

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## APPENDIX A

### DEPARTMENT OF PARKS AND RECREATION (DPR) 523 FORMS

## PRIMARY RECORD

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 3S/3CS/5S3

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7

Resource Name or #: Fresno Yosemite International Airport ATCT

**P1. Other Identifier:** Airport Traffic Control Tower (ATCT)

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted **\*a. County:** Fresno and (P2b and P2c or P2d. Attach a Location Map as necessary.)

**\*b. USGS 7.5' Quad:** Clovis, CA **Date:** 1981 **T13S; R21E; Section 30** M.D.B.M.

**c. Address:** 5175 E. Clinton Way **City:** Fresno **Zip:** 93727

**d. UTM: Zone:** 11; \_\_\_\_\_ mE/ \_\_\_\_\_ mN (G.P.S.)

**e. Other Locational Data:** (e.g., parcel #, directions to resource, elevation, etc., as appropriate): The ATCT is located approximately 330 feet north of the intersection of E. Andersen Avenue and N. Ashley Way and approximately 300 feet northeast of E. Andersen Avenue.

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)  
The International style ATCT building consists of an approximately 8,500-square-foot, one-story building with a nearly square, six-story tower. The tower is slightly off-center and has an approximately 1,090-square-foot footprint. The one-story building and the tower both have flat roofs with no eaves. The exterior walls consist of a combination of scored, stucco-covered concrete, glass, blue polyethylene panels, and slightly green aggregate panels. All of the windows, doors, sidelights, transoms, and polyethylene panels are metal-framed. A galvanized pipe rail secures the area around the cab on top of the tower. Fences prohibit access to all but the southwest elevation of the building. (See Continuation Sheet)

**\*P3b. Resource Attributes:** (List attributes and codes) HP14-Government building (airport traffic control tower)

**\*P4. Resources Present:** ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

**P5a. Photo or Drawing** (Photo required for buildings, structures, and objects.)



(See Continuation Sheet)

**P5b. Description of Photo:** (View, date, accession #) Southwest elevation, view northeast (9/11/23)

**\*P6. Date Constructed/Age and Sources:** ☒ Historic ☐ Prehistoric ☐ Both  
1961 (*Fresno Bee* 1961)

**\*P7. Owner and Address:**  
Fresno Yosemite International Airport  
5175 E. Clinton Way  
Fresno, CA 93727

**\*P8. Recorded by:** (Name, affiliation, and address)  
Casey Tibbet, M.A.  
LSA Associates, Inc.  
1500 Iowa Avenue, Suite 200  
Riverside, CA 92507

**\*P9. Date Recorded:**  
September 11, 2023

**\*P10. Survey Type:** (Describe)  
Intensive-level NEPA and CEQA compliance

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none.") Cultural Resources Assessment, Fresno Yosemite International Airport, Airport Traffic Control Tower Replacement Implementation, City of Fresno, Fresno County, California, 2024. Prepared by LSA.

**\*Attachments:** ☐ NONE ☒ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (List):



## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 7

\*NRHP Status Code 3S/3CS/5S3

\*Resource Name or # (Assigned by recorder) Fresno Yosemite International Airport ATCT

- B1. Historic Name: \_\_\_\_\_  
B2. Common Name: Airport Traffic Control Tower  
B3. Original Use: Airport Traffic Control Tower B4. Present Use: Airport Traffic Control Tower  
\*B5. Architectural Style: International  
\*B6. Construction History: (Construction date, alterations, and date of alterations)  
1957 Final plans for the Fresno airport expansion program were explained to a city commission (*Fresno Bee* 1957).  
1958 Plans for the Administration Building (control tower) were prepared by architect Allen Y. Lew, American Institute of Architects (AIA) (Lew 1958). The general contractor was Fred S. Macomber (*Fresno Bee* 1962).  
1961 The tower was complete and had its first occupant (*Fresno Bee* 1961).

- \*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_  
\*B8. Related Features: Passenger terminal and related airport facilities.

B9a. Architect: Allen Y. Lew, FAIA b. Builder: Fred S. Macomber, General Contractor

- \*B10. Significance: Themes: Architecture; Architect Area: City of Fresno  
Period of Significance: 1961 Property Type: Airport Traffic Control Tower Applicable Criteria: C  
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)  
The Fresno Yosemite International Airport (FAT) ATCT is eligible for listing in the National Register of Historic Places (National Register) under criterion C as a highly intact representative example of the International style of architecture as applied to an ATCT and as a good example of the work of master architect and Fresno native Allen Yuen Lee, Fellow of the AIA (FAIA). It also appears eligible for listing in the California Register of Historical Resources (California Register) under criterion 3 and for designation as a Historic Resource under the Fresno Historic Preservation Ordinance for the same reasons. The period of significance is 1961, when the building was first occupied.

**Historic Context.** For a detailed context refer to the related report (see P11 on page 1). In summary, the ATCT was designed in the International style by master architect and Fresno native Allen Y. Lew, FAIA. It was completed in 1961 and a review of the original design plans revealed that it has sustained only a few minor alterations. In 1962, Lew won the first Award for Excellence in Design given by the San Joaquin Valley Chapter of the AIA for the FAT terminal building and tower structure. In addition to winning a number of awards for his work, Mr. Lew was notable for his contributions to the community through his involvement on the local Planning Commission and Redevelopment Agency and his participation in numerous civic organizations. (*See Continuation Sheet*)

B11. Additional Resource Attributes: (List attributes and codes) HP37-Government buildings (airport)

- \*B12. References:  
(*See Continuation Sheet*)

B13. Remarks:

- \*B14. Evaluator: Casey Tibbet, M.A., LSA Associates, Inc., 1500 Iowa Avenue, Suite 200, Riverside, CA 92507

\*Date of Evaluation: November 2023

(Sketch Map with north arrow required.)

Refer to Location Map

(This space reserved for official comments.)

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

Page 3 of 7 \*Resource Name or #: (Assigned by recorder) Fresno Yosemite International Airport ATCT

\*Recorded by LSA Associates, Inc. \*Date: November 2023 X Continuation \_\_\_\_\_ Update \_\_\_\_\_

**P3a. Description:** (continued from page 1)

**Southwest Elevation.** This elevation faces an adjacent parking lot and is the most understated of the four elevations. From left to right the one-story portion of this elevation includes: eight stuccoed panels and an accent of three metal posts that extend above the roof; four vertical-rectangular windows with blue polyethylene panels above and below; and a recessed section (described in more detail below) that includes the primary entrance and a solid metal door topped by a transom and a blue polyethylene panel. The remainder of the elevation has greenish-colored aggregate panels, stuccoed panels, and two more metal post accents.

The recessed primary entrance has a glass door and windows, sidelights, and transoms all topped by a horizontal band of three, blue polyethylene panels. The entrance is sheltered under the flat roof of the building, and there is a dedication plaque on the west wall and a three-metal post accent attached to the fascia east of the entrance. The remainder of the recessed section has four rectangular cutouts in the roof to allow natural light above the metal door, which leads to an interior stairwell. The cutout part of the roof is supported by two aluminum trim columns. Together, the cutouts are approximately the width of the tower, which extends above them. This section is also accented by greenish-colored aggregate panels, which extend up and around the sides of the tower.

The tower portion of the southwest elevation is characterized by 91 (7 over 13) greenish-colored aggregate panels and an off-center, vertical stripe of alternating windows and blue polyethylene panels that extend above the stairwell door to the top of the tower. The windows consist of narrow, vertical, metal slats that are angled and have an opaque appearance. Both corners of the tower have full-height, aluminum trim. The cab on top of the tower has large, angled, tinted windows above blue polyethylene panels and a flat roof.

**Southeast Elevation.** The southeast (side) elevation is adjacent to the maintenance building. The one-story portion of the elevation, from left to right, includes: four stuccoed panels; a glass door below a very small metal awning and flanked by sidelights; two stuccoed panels; and a ribbon of eight, vertical-rectangular windows with blue polyethylene panels above and below. The metal awning above the door is flanked by blue polyethylene panels and above them is a ribbon of three windows topped by a ribbon of three blue polyethylene panels.

The southeast elevation of the tower has 44 (4 over 11) greenish-colored aggregate panels and alternating bands of six sliding windows and six blue polyethylene panels. Both corners of the building have full-height aluminum trim. There are metal vents at the bottom of each of the panels in the first column, except for the top panel. It appears that an additional vent was added to the top of one of the panels and one of the windows has been filled in to accommodate a wall-mounted air conditioning unit. The southeast elevation of the cab has angled windows above blue polyethylene panels.

**Northeast Elevation.** The northeast (rear) elevation faces the runways. The one-story portion of the building is generally characterized by a row of blue polyethylene panels above and below vertical-rectangular and horizontal-rectangular windows of varying sizes. However, there are four, large, fixed windows east of the doors that only have panels above them. There are three, metal, pole accents, identical to the ones on the southwest elevation. The entrance consists of a pair of glass doors. A thin metal canopy shelters the doors and extends northwest over the windows, ending where the elevation consists of stuccoed panels. A chain-link fence secures the doors and the adjacent landscaped area to the northwest and wraps around a portion of the northwest (side) elevation.

The tower portion of this elevation has 11 alternating rows of blue polyethylene panels (eight per row) and sliding windows (eight per row). Both corners of the building have full-height aluminum trim. The northeast elevation of the cab has three, angled windows above blue polyethylene panels.

**Northwest Elevation.** The northwest (side) elevation faces a landscaped area and a small parking area. The northwest corner of this elevation is partially obscured from view by a privacy fence. The one-story portion of the building has, from left to right: what appears to be two, vertical-rectangular windows with blue polyethylene panels above and below; a window with a transom and blue polyethylene panel above; a glass door with a transom and a blue polyethylene panel above; a slanted, metal canopy above the window and door; six, full-height, stuccoed panels; a ribbon of four, vertical-rectangular windows with blue polyethylene panels above and below; and two, full-height, stuccoed panels.

The tower portion of this elevation has 11 alternating rows of six blue polyethylene panels and six sliding windows and 44 (4 over 11) greenish, aggregate panels. Both corners of the building have full-height aluminum trim. One of the windows has been filled in to accommodate an air conditioning unit and one of the top aggregate panels has a metal vent that may be an alteration. The cab has three, fixed, angled windows above three, polyethylene panels.

Overall, the ATCT appears to have only a few, minor alterations consisting of two vents and two air conditioning units on the side elevations.

(See Continuation Sheet)



State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_

Page 4 of 7      \*Resource Name or #: (Assigned by recorder) Fresno Yosemite International Airport ATCT  
\*Recorded by LSA Associates, Inc.      \*Date: November 2023      X Continuation      \_\_\_\_\_ Update

**P5a. Photo** (continued from page 1)



Southeast (side) elevation, view northwest (9/11/23).



Northeast elevation, view southwest (9/11/23).



Northeast elevation, view south (9/11/23).



Northwest (side) elevation, view southeast (9/11/23).

**B10. Significance** (continued from page 2).

The building is evaluated below for historical significance under the criteria for listing in the National Register and the California Register and for designation under the City's ordinance. Because all three sets of criteria are nearly identical, they have been grouped together to avoid redundancy. (Refer to the related report for detailed information about each set of criteria.)

**Criteria A/1/1.i.** The ATCT building was constructed in the post-World War II (WWII) period, which was a time of extreme growth in California and most of the nation. During this period, millions of new homes were built, along with supporting civic, commercial, and recreational amenities. The development and expansion of the FAT, including construction of the ATCT, was at least partially driven by the population surge in the San Joaquin Valley and the growing use of air transportation for business and recreational reasons. While the ATCT is associated with this historically significant event (post-WWII boom), it did not play an important role in instigating, facilitating, or accelerating it. The ATCT is not significant under these criteria.

(See Continuation Sheet)



State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

Page 5 of 7 \*Resource Name or #: (Assigned by recorder) Fresno Yosemite International Airport ATCT

\*Recorded by LSA Associates, Inc. \*Date: November 2023 X Continuation        Update

**B10. Significance** (continued from page 4).

**Criteria B/2/1.ii.** Research did not identify any historically significant people associated with this building. It is not significant under these criteria.

**Criteria C/3/1.iii.** The ATCT embodies many of the distinctive characteristics of the International style including its simple, rectilinear geometric form, concrete and steel construction, unadorned wall surfaces that are generally smooth, absence of ornamentation, flat roofs, large areas of glass, and bands of metal-framed windows that are flush with the exterior walls. It is a highly intact, representative example of the International style of architecture as applied to an airport traffic control tower. In addition, it is the work of master architect Allen Y. Lew, FAIA. In 1962, Lew won an Award for Excellence in Design for the FAT terminal building and tower structure. His 1971 nomination to the AIA College of Fellows was based on the work he did in the 1960s and specifically mentioned the airport in addition to noting that his solutions to complex projects had an air of simplicity and restraint that is his outstanding stamp of achievement. The ATCT is a good example of the simplicity and restraint that was the hallmark of his designs from that early period of his career. The ATCT is significant under these criteria.

**Criteria D/4/1.iv.** The building was constructed in the post-WWII period using common methods and materials. It does not have the potential to yield new information related to prehistory or history. It is not significant under these criteria.

**Character-Defining Features.** In order to assess the integrity of the building, its essential physical features must be identified. These features, commonly called character-defining features (CDFs), are those that must be present in order for the building to represent or convey its significance (National Park Service 1995). The following have been identified as CDFs for the ATCT:

- Simple, rectilinear geometric forms of the horizontally oriented one-story portion of the building and the vertically oriented tower;
- Balance and regularity of design represented by the window and panel pattern on the one-story building and the alternating bands of windows and blue polyethylene panels, as well as the greenish aggregate panels on the tower;
- Cab with angled windows above blue polyethylene panels;
- Stucco and aggregate wall panels;
- Flat roofs without ledges or eaves; and
- Metal window and panel frames set flush with the exterior walls.

**Integrity.** In order to qualify for listing in the National Register or California Register or for designation under the City's ordinance, in addition to meeting one or more of the criteria discussed above, a resource must also retain enough integrity to convey its significance. The seven aspects of integrity are discussed below.

**Location.** "Location is the place where the historic property was constructed" (National Park Service 1995:44). The ATCT is in its original location. The integrity of the location is high.

**Design.** "Design is the combination of elements that create the form, plan, space, structure, and style of a property" (National Park Service 1995:44). A review of the original plans and drawings for the ATCT reveals that the design of the building has sustained only a few minor alterations (two vents and two, window-mounted air conditioning units) to the side elevations. The integrity of the design is high.

**Setting.** "Setting is the physical environment of a historic property" (National Park Service 1995:45). The immediate setting consisting of the ATCT and adjacent parking lot, fire station, maintenance building, and hangars is relatively unchanged from 1961 when the building was first occupied. However, development within the larger airport facility has resulted in changes to the broader setting. These changes have minimized and/or changed views of the ATCT from the terminal and other public locations within the airport property. The integrity of the setting is moderate.

**Materials.** "Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property" (National Park Service 1995:45). A review of the original plans and drawings for the ATCT reveals that the original materials remain. There are only four very small places where the material has been changed to accommodate two window air conditioning units and two vents. The integrity of the materials is high.

**Workmanship.** "Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory" (National Park Service 1995:45). Although the International style is characterized by simplicity in design and a lack of ornamentation, workmanship is evident in the way the aggregate panels, glass, and blue polyethylene panels are used together to create the overall design. The integrity of the workmanship is high.

(See Continuation Sheet)

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_

Page 6 of 7 \*Resource Name or #: (Assigned by recorder) Fresno Yosemite International Airport ATCT

\*Recorded by LSA Associates, Inc. \*Date: November 2023 X Continuation        Update

**B10. Significance** (continued from page 5)

**Feeling.** "Feeling is a property's expression of the aesthetic or historic sense of a particular period of time" (National Park Service 1995:45). The ATCT evokes a sense of stepping back in time to the glamorous age of air travel in the early post-WWII period. This is largely attributed to the International style of the building and its color palette, which features vibrant blue polyethylene panels and subtle green aggregate panels. The integrity of the feeling is high.

**Association.** "Association is the direct link between an important historic event or person and a historic property" (National Park Service 1995:45). The ATCT retains its association with the FAT as it is still used as the ATCT for the airport. In addition, because it has sustained almost no exterior alterations, it also retains its association with master architect Allen Y. Lew, FAIA. The integrity of the association is high.

In summary, the Fresno Yosemite International Airport ATCT retains a high degree of integrity and meets the criteria for listing in the National Register and the California Register and for designation as a Historic Resource under the City's ordinance. It is significant under Criteria C/3/1.iii as a highly intact representative example of the International style of architecture as applied to an airport traffic control tower and as a good example of the work of master architect Allen Y. Lew, FAIA. Its period of significance is 1961, when it was first occupied.

**B12. References:** (continued from page 2)

*Fresno Bee*

- 1957 Airport Expansion Plans Will Be Heard. January 20, page number missing. Provided by the Fresno County Public Library, Heritage Center in September 2023.
- 1961 New Terminal Tower Gets First Tenant. July 10, page 15.
- 1962 Advertisement for the grand opening of the airport terminal. March 25, page 15-A.

Lew, Allen Y. AIA

- 1958 Design plans for the Administration Building. Provided by and on file at the Fresno Yosemite International Airport.

National Park Service

- 1995 National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation. Website: [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf) (accessed October and November 2023).



State of California - Resource Agency  
DEPARTMENT OF PARKS AND RECREATION  
LOCATION MAP

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_

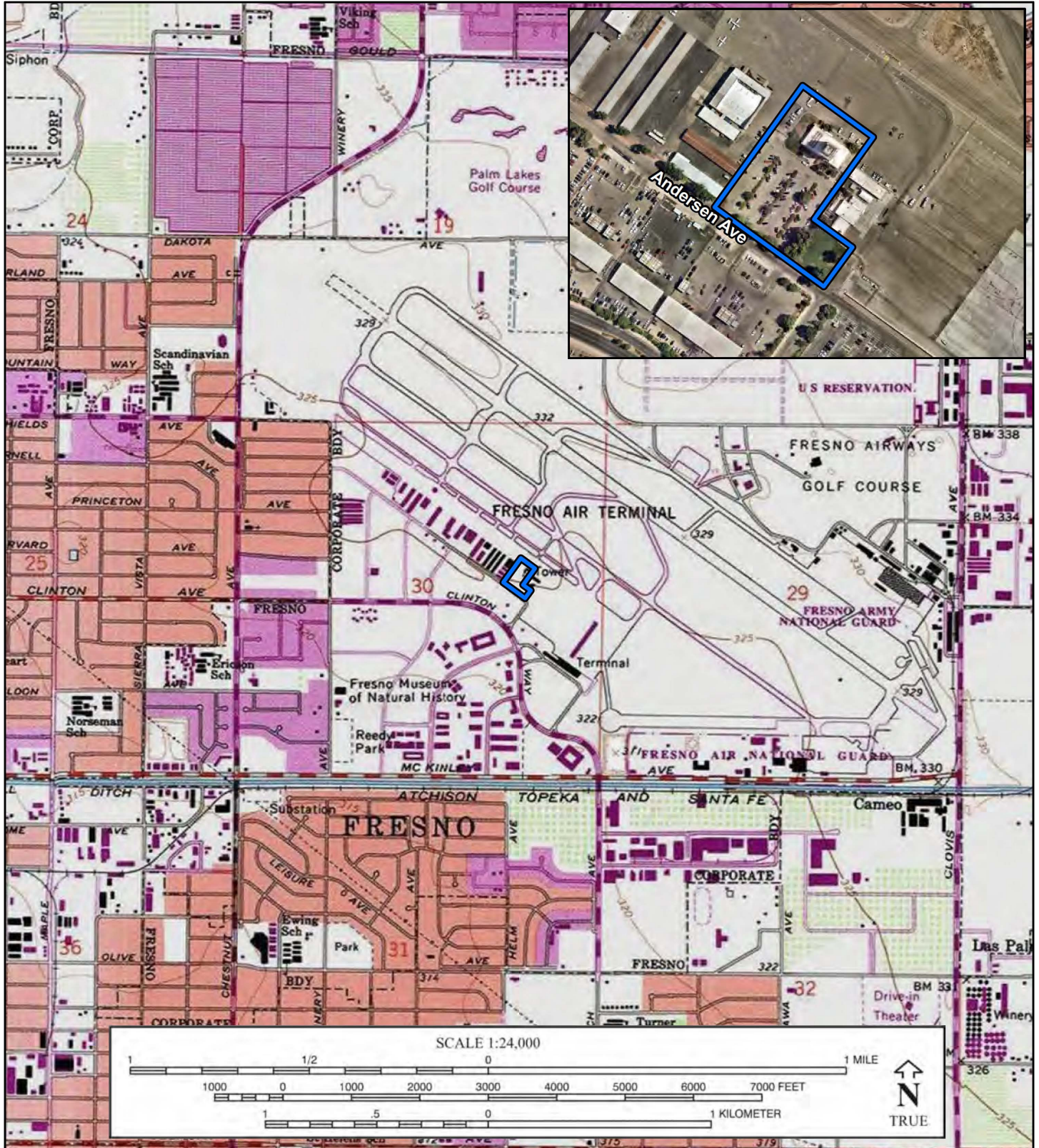
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\*Resource Name or \_\_\_\_\_ Fresno Yosemite International Airport ATCT

\*Map Name: USGS 7.5' Quad, Clovis; Nearmap

\*Scale: 1:24000

\*Date of Map: 1981; 2023



J:\20230936.01\GIS\Pro\Fresno ATCT\Fresno ATCT.aprx (9/27/2023)

DPR 523J (1/95)

\*Required Information



## PRIMARY RECORD

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Y/6Z

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 4

Resource Name or #: Fresno Yosemite International Airport ARFF

P1. Other Identifier: Aircraft Rescue and Fire Fighting facility (ARFF)

\*P2. Location: ☐ Not for Publication ☒ Unrestricted \*a. County: Fresno and (P2b and P2c or P2d. Attach a Location Map as necessary.)

\*b. USGS 7.5' Quad: Clovis, CA Date: 1981 T13S; R21E; Section 30 M.D.B.M.

c. Address: 5175 E. Clinton Way City: Fresno Zip: 93727

d. UTM: Zone: 11; \_\_\_\_\_mE/ \_\_\_\_\_mN (G.P.S.)

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate): The ARFF is located north of the intersection of E. Andersen Avenue and N. Ashley Way and approximately 130 feet northeast of E. Andersen Avenue.

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The one-story ARFF is situated southeast of the airport traffic control tower (ATCT). It is roughly shaped like a lowercase T and has a multi-level, flat roof with parapets. The central bay has concrete block walls, and the other bays have stucco-covered walls with narrow, vertical accents flanking the windows. Fenestration appears to consist of modern, vinyl sliding windows. The central bay, which features two garage doors in the southeast elevation, is larger and taller than the other two bays which appear to house offices. This is a secured facility and only the southwest end of the building is clearly visible from the public right-of-way (ROW) (East Andersen Avenue).

The southwest elevation faces the adjacent parking lot. The northeast and central parts of this elevation are obscured from view by vegetation and an articulated and perforated concrete block screen wall that forms an enclosed, rectangular patio area in front of the central bay. There appears to be a freestanding, flat-roofed patio cover inside the screen wall. The southwest end of the elevation has two, horizontal-rectangular ribbon windows that are obscured from view by metal security bars. Although the building is utilitarian and non-descript, when viewed from the parking lot, the screen wall coupled with the multi-level flat roof and smooth exterior walls give the impression of a Mid-Century Modern design aesthetic. (See Continuation Sheet)

\*P3b. Resource Attributes: (Original uses) HP14-Government building (fire station)

\*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



(See Continuation Sheet)

P5b. Description of Photo: (View, date, accession #) **Top:** northwest elevation (adjacent to parking lot), view southeast (9/11/23). **Bottom:** southeast elevation (facing the terminal), view northwest (7/30/24)

\*P6. Date Constructed/Age and Sources: ☒ Historic ☐ Prehistoric ☐ Both  
1961 (*Fresno Bee* 1961)

\*P7. Owner and Address:  
Fresno Yosemite International Airport  
5175 E. Clinton Way  
Fresno, CA 93727

\*P8. Recorded by: (Name, affiliation, and address)  
Casey Tibbet, M.A.  
LSA Associates, Inc.  
1500 Iowa Avenue, Suite 200  
Riverside, CA 92507

\*P9. Date Recorded: September 11, 2023, with supplemental photographs taken in July 2024.

\*P10. Survey Type: (Describe) Intensive-level Section 106 and CEQA compliance

\*P11. Report Citation: (Cite survey report and other sources, or enter "none.") Cultural Resources Assessment, Fresno Yosemite International Airport, Airport Traffic Control Tower Replacement Implementation, City of Fresno, Fresno County, California, 2024. Prepared by LSA.

\*Attachments: ☐ NONE ☒ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (List):

## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 4

\*NRHP Status Code 6Y/6Z

\*Resource Name or # (Assigned by recorder) Fresno Yosemite International Airport ARFF

- B1. Historic Name: \_\_\_\_\_  
B2. Common Name: \_\_\_\_\_  
B3. Original Use: Aircraft Rescue and Fire Fighting facility B4. Present Use: Same  
\*B5. Architectural Style: Vernacular with a Mid-Century Modern influence  
\*B6. Construction History: (Construction date, alterations, and date of alterations)  
1959 Funding was obtained for construction of five new buildings at the airport, including the ARFF. Construction on all five was anticipated to start in August 1959 (*Fresno Bee* 1959a). All five buildings were designed by architect Allen Y. Lew, Fellow of the American Institute of Architects (FAIA) (*Fresno Bee* 1959b).  
1961 In July construction of the ARFF was underway (*Fresno Bee* 1961).  
\*B7. Moved? ☒No ☐Yes ☐Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_  
\*B8. Related Features:  
B9a. Architect: Allen Y. Lew, FAIA b. Builder: Fred S. Macomber, General Contractor  
\*B10. Significance: Theme: \_\_\_\_\_ Area: \_\_\_\_\_  
Period of Significance: \_\_\_\_\_ Property Type: \_\_\_\_\_ Applicable Criteria: NA  
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)  
The Fresno Yosemite International Airport ARFF is not eligible for listing in the National Register of Historic Places (National Register) or the California Register of Historical Resources (California Register) under any criteria or for designation as a Historic Resource under the local ordinance. It is not a "historic property" pursuant to Section 106 of the National Historic Preservation Act (NHPA) or a "historical resource" as defined by the California Environmental Quality Act (CEQA). (See *Continuation Sheet*)

**Historic Context.** For a detailed context refer to the related report (see P11 on page 1).

**B11. Additional Resource Attributes:** (List attributes and codes) HP37-Government buildings (airport)

**\*B12. References:**

*Fresno Bee*

- 1959a Fresno Airport Gets \$100,000 More US Funds. May 5, page 21.  
1959b City Will Ask Bids On Five New Buildings At Airport. June 5, page 19.  
1961 New Terminal Tower Gets First Tenant. July 10, page 6-B.

**B13. Remarks:**

\*B14. Evaluator: Casey Tibbet, M.A., LSA Associates, Inc., 1500 Iowa Avenue, Suite 200, Riverside, CA 92507

\*Date of Evaluation: August 2024

(Sketch Map with north arrow required.)

Refer to Location Map

(This space reserved for official comments.)



State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

Page 3 of 4      \*Resource Name or #: (Assigned by recorder) Fresno Yosemite International Airport ARFF

\*Recorded by LSA Associates, Inc.      \*Date: August 2024      X Continuation      \_\_\_\_\_ Update

**\*P3a. Description:** (continued from page 1)

The southwest elevation is the only elevation that is clearly visible from the public ROW (East Andersen Avenue). It is adjacent to a large area landscaped with grass and trees. It has a single door and several narrow, vertical accents. The southeast elevation faces the airport terminal building. It includes four pairs of vinyl-framed sliding and fixed window separated by narrow vertical accents in the southeast bay, a pair of garage doors in the central bay, and, in the northwest bay, a door and a pair of vinyl-framed windows beneath a pent roof awning and a pair of vinyl-framed sliding windows. Narrow, vertical accents flank the door and windows. The northeast elevation faces a freestanding, prefabricated shade structure/carport and a maintenance building. This elevation has a horizontal-rectangular ribbon window and a small vinyl-framed sliding window. Like the other elevations, it has narrow, vertical accents.

**P5a. Photo** (continued from page 1)



Northwest elevation (adjacent to parking lot), view southeast (9/11/23)

**\*B10. Significance:** (continued from page 2)

The building is evaluated below for historical significance under the criteria for listing in the National Register and the California Register and for designation under the City's ordinance. Because all three sets of criteria are nearly identical, they have been grouped together to avoid redundancy. (Refer to the related report for detailed information about each set of criteria.)

**Criteria A/1/1.i.** The ARFF building was constructed in the post-World War II (WWII) period, which was a time of extreme growth in California and most of the nation. During this period, millions of new homes were built, along with supporting civic, commercial, and recreational amenities. The development and expansion of the FAT, including construction of the ARFF, was at least partially driven by the population surge in the San Joaquin Valley and the growing use of air transportation for business and recreational reasons. While the ARFF is associated with this historically significant event (post-WWII boom), it did not play an important role in instigating, facilitating, or accelerating it. The ARFF is not significant under these criteria.

**Criteria B/2/1.ii.** Research did not identify any historically significant people associated with this building. It is not significant under these criteria.

**Criteria C/3/1.iii.** From the vantage point of the parking lot, the freestanding screen wall, coupled with the building's flat, multi-level roof and smooth wall surfaces, make the building appear to have a Mid-Century Modern aesthetic. However, this is essentially an illusion. Without this feature, the ARFF building is relatively non-descript and utilitarian and does not embody distinctive architectural characteristics. In addition, its integrity of materials, design, and workmanship has been compromised by replacement of most, if not all, of the windows. Although it is the work of a master architect, the focus is on function rather than style. It is an ancillary building that is not intended to be a focal point and was not included in the 1962 design award. The ARFF facility is not significant under these criteria.

**Criteria D/4/1.iv.** The building was constructed in the post-WWII period using common methods and materials. It does not have the potential to yield new information related to prehistory or history. It is not significant under these criteria.



State of California - Resource Agency  
DEPARTMENT OF PARKS AND RECREATION  
LOCATION MAP

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_

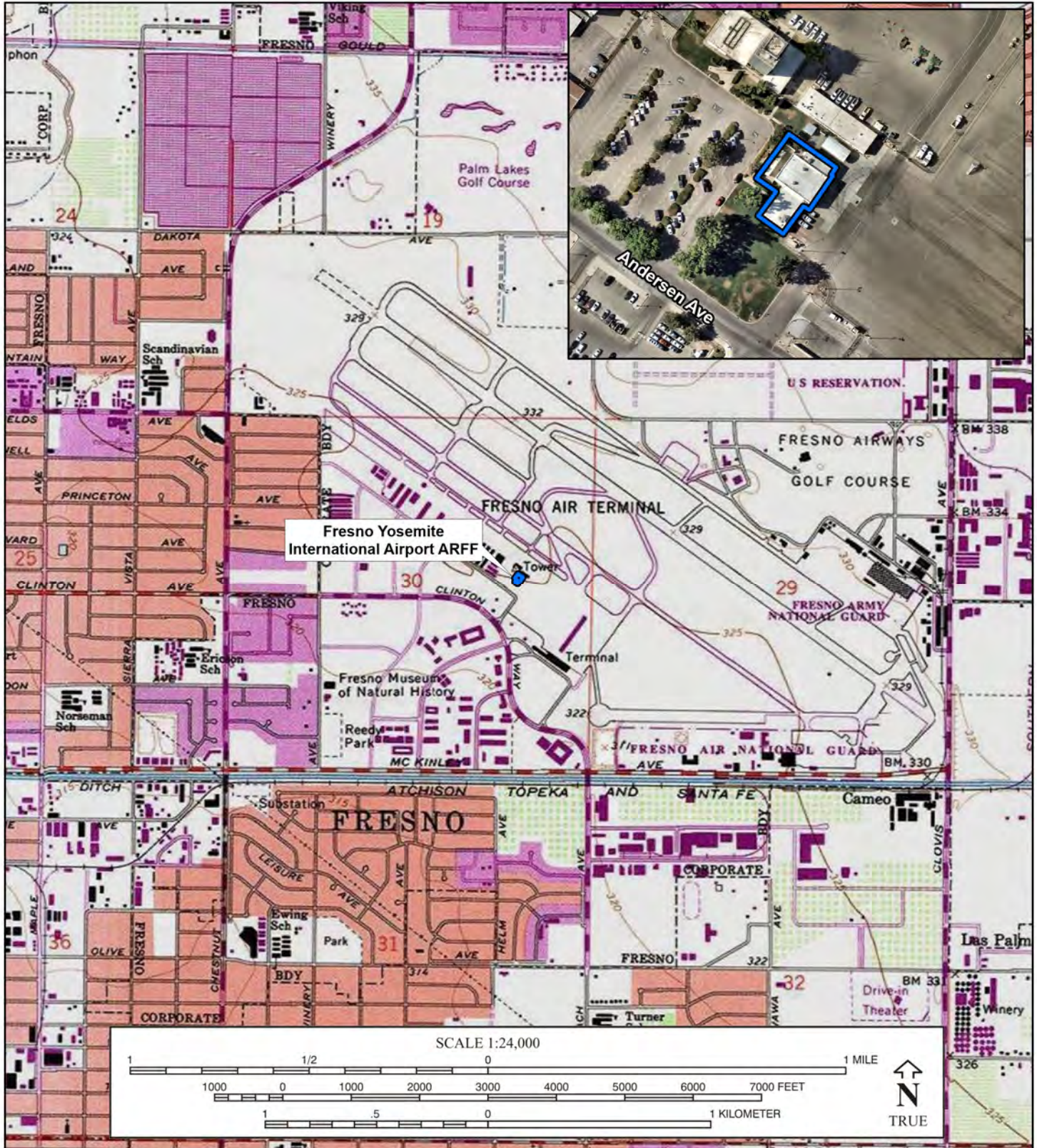
Page 4 of 4

\*Resource Name or \_\_\_\_\_ Fresno Yosemite International Airport ARFF

\*Map Name: USGS 7.5' Quad, Clovis; Nearmap

\*Scale: 1:24000

\*Date of Map: 1981; 2024





## PRIMARY RECORD

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Y/6Z

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 4

Resource Name or #: Fresno Yosemite International Airport Maintenance Building

P1. Other Identifier: \_\_\_\_\_

\*P2. Location: ☐ Not for Publication ☒ Unrestricted \*a. County: Fresno and (P2b and P2c or P2d. Attach a Location Map as necessary.)

\*b. USGS 7.5' Quad: Clovis, CA Date: 1981 T13S; R21E; Section 30 M.D.B.M.

c. Address: 5175 Clinton Way City: Fresno Zip: 93727

d. UTM: Zone: 11; \_\_\_\_\_mE/ \_\_\_\_\_mN (G.P.S.)

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate): This maintenance building is located southeast of the Airport Traffic Control Tower (ATCT) and northeast of E. Andersen Avenue and the Aircraft Rescue and Fire Fighting facility.

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

This one-story maintenance building is not visible from the public right-of-way and is only minimally visible from the parking lot southwest of the ATCT. The building is rectangular in plan and has a flat roof with a slightly projecting fascia. Although otherwise nondescript, the building features exterior walls with large, articulated panels and metal pole accents similar to those found on the adjacent ATCT. The nearly symmetrical southwest (rear) elevation has a pair of metal doors set flush with the wall, three metal pole accents, a horizontal band of windows set high in the wall, and another group of three metal pole accents. The southeast (end) elevation has two bay doors. The northwest elevation, facing the runway, has three metal pole accents, a single window below a ribbon of windows set high in the wall with an air conditioning unit in one, a single door, three garage doors, what appear to be vents, and three metal pole accents. The northwest (end) elevation has what appears to be a large vent.

\*P3b. Resource Attributes: (Original uses) HP14-Government building (airport maintenance building)

\*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo: (View, date, accession #) Northeast elevation (facing runway), view southwest (9/1/23)

\*P6. Date Constructed/Age and Sources: ☒ Historic ☐ Prehistoric ☐ Both  
1961 (*Fresno Bee* 1961)

\*P7. Owner and Address:  
Fresno Yosemite International Airport  
5175 E. Clinton Way  
Fresno, CA 93727

\*P8. Recorded by: (Name, affiliation, and address)  
Casey Tibbet, M.A.  
LSA Associates, Inc.  
1500 Iowa Avenue, Suite 200  
Riverside, CA 92507

\*P9. Date Recorded: September 11, 2023, with supplemental photographs taken in July 2024.

\*P10. Survey Type: (Describe) Intensive-level Section 106 and CEQA compliance

\*P11. Report Citation: (Cite survey report and other sources, or enter "none.") Cultural Resources Assessment, Fresno Yosemite International Airport, Airport Traffic Control Tower Replacement Implementation, City of Fresno, Fresno County, California, 2024. Prepared by LSA.

\*Attachments: ☐ NONE ☒ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (List):

## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 4

\*NRHP Status Code 6Y/6Z

\*Resource Name or #: Fresno Yosemite International Airport Maintenance Building

B1. Historic Name: \_\_\_\_\_

B2. Common Name: \_\_\_\_\_

B3. Original Use: Maintenance building B4. Present Use: Same

\*B5. Architectural Style: Vernacular

\*B6. Construction History: (Construction date, alterations, and date of alterations)

1959 Funding was obtained for construction of five new buildings at the airport, including this maintenance building. Construction on all five was anticipated to start in August 1959 (*Fresno Bee* 1959a). All five buildings were designed by architect Allen Y. Lew, Fellow of the American Institute of Architects (FAIA) (*Fresno Bee* 1959b).

1961 The ATCT and the Aircraft Rescue and Fire Fighting (ARFF) facility were under construction and anticipated to be completed by August 1961. The maintenance building, which is adjacent to the ATCT and ARFF, was likely completed about the same time as these buildings (*Fresno Bee* 1961).

\*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\*B8. Related Features:

B9a. Architect: Allen Y. Lew, FAIA b. Builder: Fred S. Macomber, General Contractor

\*B10. Significance: Theme: \_\_\_\_\_ Area: \_\_\_\_\_

Period of Significance: \_\_\_\_\_ Property Type: \_\_\_\_\_ Applicable Criteria: NA

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

This Fresno Yosemite International Airport maintenance building is not eligible for listing in the National Register of Historic Places (National Register) or the California Register of Historical Resources (California Register) under any criteria or for designation as a Historic Resource under the local ordinance. It is not a "historic property" pursuant to Section 106 of the National Historic Preservation Act (NHPA) or a "historical resource" as defined by the California Environmental Quality Act (CEQA). (See *Continuation Sheet*)

**Historic Context.** For a detailed context refer to the related report (see P11 on page 1).

**B11. Additional Resource Attributes:** (List attributes and codes) HP37-Government buildings (airport)

\*B12. References:

*Fresno Bee*

1959a Fresno Airport Gets \$100,000 More US Funds. May 5, page 21.

1959b City Will Ask Bids On Five New Buildings At Airport. June 5, page 19.

1961 New Terminal Tower Gets First Tenant. July 10, page 6-B.

**B13. Remarks:**

\*B14. Evaluator: Casey Tibbet, M.A., LSA Associates, Inc., 1500 Iowa Avenue, Suite 200, Riverside, CA 92507

\*Date of Evaluation: August 2024

(Sketch Map with north arrow required.)

Refer to Location Map

(This space reserved for official comments.)

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_

Page 3 of 4

\*Resource Name or #: (Assigned by recorder) Fresno Yosemite International Airport  
Maintenance Building

\*Recorded by LSA Associates, Inc. \*Date: August 2024 ☒ Continuation ☐ Update

**\*B10. Significance** (continued from page 2)

The building is evaluated below for historical significance under the criteria for listing in the National Register and the California Register and for designation under the City's ordinance. Because all three sets of criteria are nearly identical, they have been grouped together to avoid redundancy. (Refer to the related report for detailed information about each set of criteria.)

**Criteria A/1/1.i.** The maintenance building was constructed in the post-World War II (WWII) period, which was a time of extreme growth in California and most of the nation. During this period millions of new homes were built, along with supporting civic, commercial, and recreational amenities. The development and expansion of the FAT, including construction of the maintenance building, were at least partially driven by the population surge in the San Joaquin Valley and the growing use of air transportation for business and recreational reasons. While the building is associated with this historically significant event (post-WWII boom), it did not play an important role in instigating, facilitating, or accelerating it. The building is not significant under these criteria.

**Criteria B/2/1.ii.** Research did not identify any historically significant people associated with this building. It is not significant under these criteria.

**Criteria C/3/1.iii.** The maintenance building is not representative of any architectural style. Although it incorporates the articulated panels and metal pole accents found on the ATCT, it is otherwise nondescript and utilitarian. It is the work of a master architect, but similar to the ARFF facility, the focus is on function rather than style. This is an ancillary building that was not intended to be a focal point and was not included in the 1962 design award. The maintenance building is not significant under these criteria.

**Criteria D/4/1.iv.** The building was constructed in the post-WWII period using common methods and materials. It does not have the potential to yield new information related to prehistory or history. It is not significant under these criteria.



State of California - Resource Agency  
**DEPARTMENT OF PARKS AND RECREATION**  
**LOCATION MAP**

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_

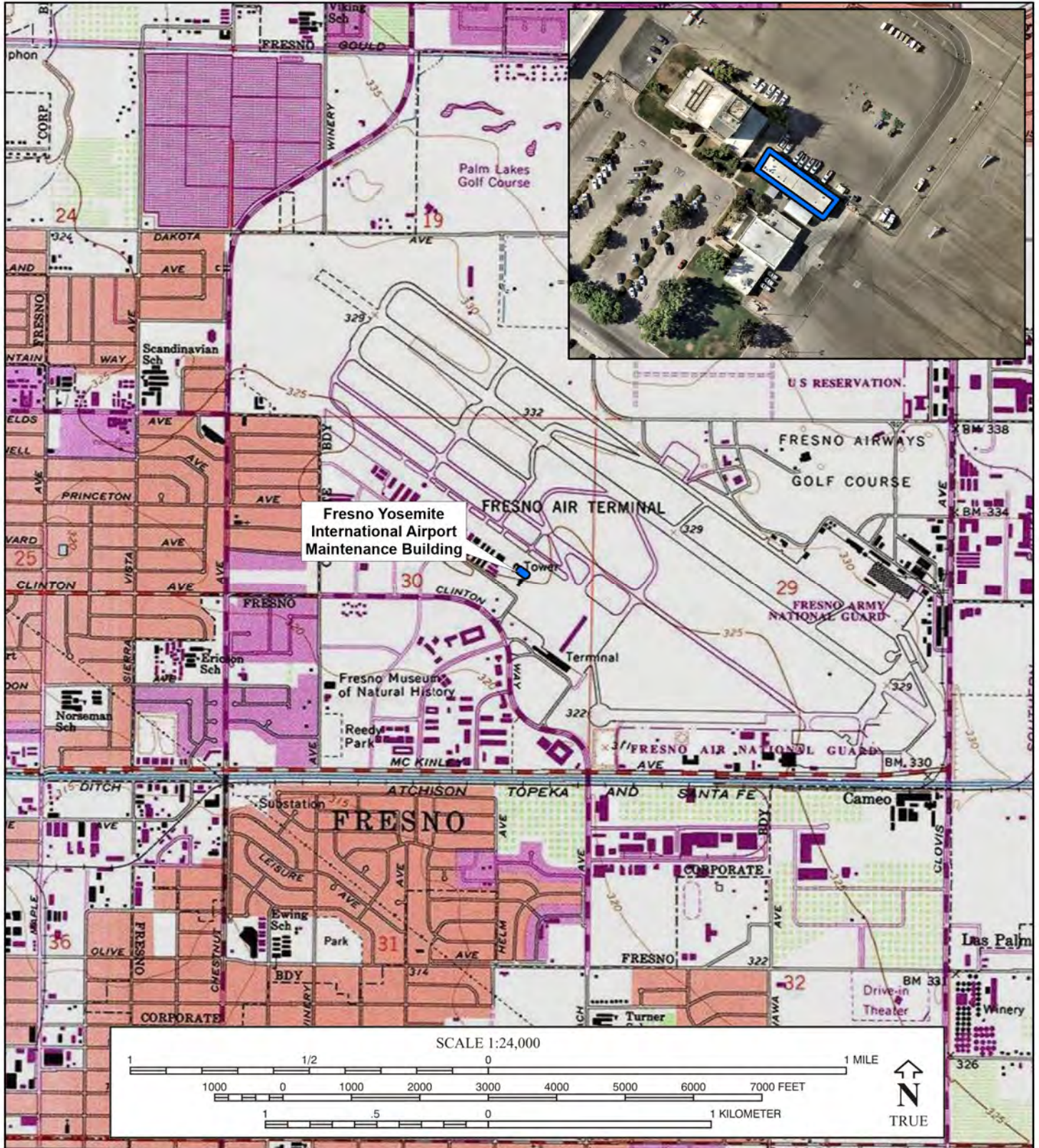
Page 4 of 4

\*Resource Name or Fresno Yosemite International Airport Maintenance Building

\*Map Name: USGS 7.5' Quad, Clovis; Nearmap

\*Scale: 1:24000

\*Date of Map: 1981; 2024



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## APPENDIX B

### RECORDS SEARCH RESULTS

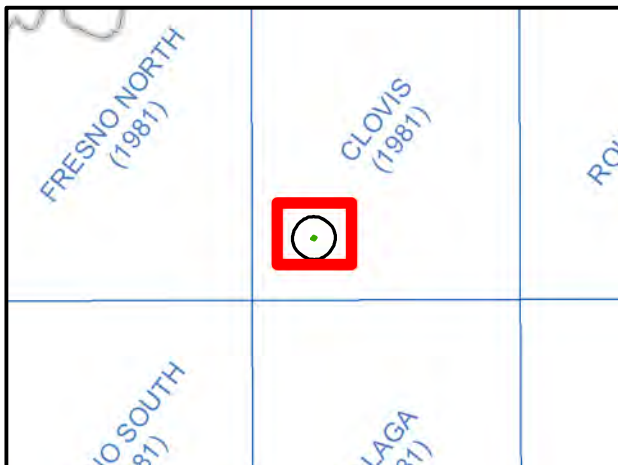
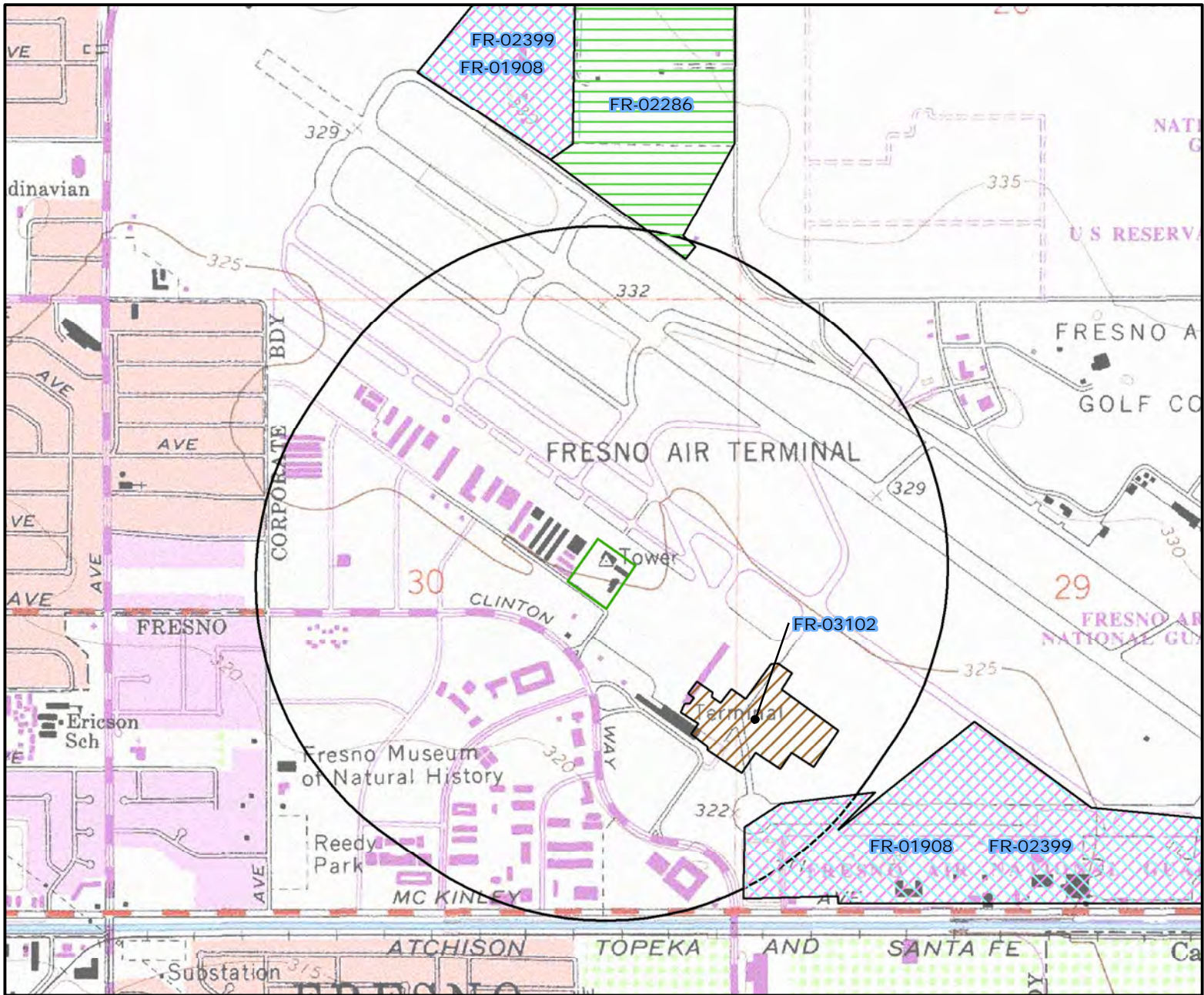


California  
Historical  
Resources  
Information  
System



Fresno  
Kern  
Kings  
Madera  
Tulare

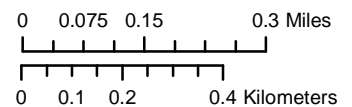
Southern San Joaquin Valley Information Center  
California State University, Bakersfield  
Mail Stop: 72 DOB  
9001 Stockdale Highway  
Bakersfield, California 93311-1022  
(661) 654-2289  
E-mail: ssjvic@csub.edu  
Website: www.csub.edu/ssjvic



May depict confidential cultural resource locations. Do not distribute.

Map pages depicting no data have been excluded.

-  Project Area
-  Record Search radius



SSJV Information Center Record Search 24-266  
Requester: Rory Goodwin; LSA  
Project Name: Fresno Airport RCTC (# 20240936.01)  
USGS 7.5' Quad(s): Clovis  
County: Fresno



6/17/2024

Rory Goodwin  
LSA Associates, Inc.  
1500 Iowa Ave, Suite 200  
Riverside, CA 92507

Re: Fresno Airport ACTC Project/LSA # 20230936.01  
Records Search File No.: 24-266

The Southern San Joaquin Valley Information Center received your record search request for the project area referenced above, located on Clovis USGS 7.5' quads. The following reflects the results of the records search for the project area and the 0.5 mile radius:

As indicated on the data request form, the locations of resources and reports are provided in the following format: ☒ custom GIS maps ☐ GIS data

Resources within project area:	None
Resources within 0.5 mile radius:	None
Reports within project area:	None
Reports within 0.5 mile radius:	FR-01908, 02286, 02399, 03102

**Resource Database Printout (list):** ☐ enclosed ☐ not requested ☒ nothing listed

**Resource Database Printout (details):** ☐ enclosed ☒ not requested ☐ nothing listed

**Resource Digital Database Records:** ☐ enclosed ☒ not requested ☐ nothing listed

**Report Database Printout (list):** ☒ enclosed ☐ not requested ☐ nothing listed

**Report Database Printout (details):** ☐ enclosed ☒ not requested ☐ nothing listed

**Report Digital Database Records:** ☐ enclosed ☒ not requested ☐ nothing listed

**Resource Record Copies:** ☐ enclosed ☐ not requested ☒ nothing listed

**Report Copies:** ☐ enclosed ☐ not requested ☒ nothing listed

**OHP Built Environment Resources Directory:** ☐ enclosed ☒ not requested ☐ nothing listed

**Archaeological Determinations of Eligibility:** ☐ enclosed ☒ not requested ☐ nothing listed

**CA Inventory of Historic Resources (1976):** ☐ enclosed ☒ not requested ☐ nothing listed



**Caltrans Bridge Survey:** Not available at SSJVIC; please see  
<https://dot.ca.gov/programs/environmental-analysis/cultural-studies/california-historical-bridges-tunnels>

**Ethnographic Information:** Not available at SSJVIC

**Historical Literature:** Not available at SSJVIC

**Historical Maps:** Not available at SSJVIC; please see  
<http://historicalmaps.arcgis.com/usgs/>

**Local Inventories:** Not available at SSJVIC

**GLO and/or Rancho Plat Maps:** Not available at SSJVIC; please see  
<http://www.glorerecords.blm.gov/search/default.aspx#searchTabIndex=0&searchByTypeIndex=1> and/or  
<http://www.oac.cdlib.org/view?docId=hb8489p15p;developer=local;style=oac4;doc.view=items>

**Shipwreck Inventory:** Not available at SSJVIC; please see  
<https://www.slc.ca.gov/shipwrecks/>

**Soil Survey Maps:** Not available at SSJVIC; please see  
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

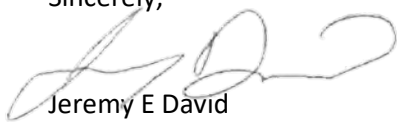
The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Invoices for Information Center services will be sent under separate cover from the California State University, Bakersfield Accounting Office.

Thank you for using the California Historical Resources Information System (CHRIS).

Sincerely,



Jeremy E David  
Assistant Coordinator

## Report List

SSJVIC Record Search 24-266

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
FR-01908		1999	Unknown	Desprition of Proposed Action and Alternatives Environmental Assessment for Short-Term Consturction Project at the 144th Fighter Wing, California Air National Guard Fresno Yosemite International Airport, Fresno, California	Air National Guard, Environmental Division	
FR-02286		2006	Donaldson, Milford Wayne	Multiple Construction Projects at the Fresno Aviation Classification Repair Activity Depot, California	Department of Parks and Recreation	
FR-02399		2010	Unknown	144th Fighter Wing California Air National Guard, Fresno Air National Guard Base, Draft Final Integrated Cultural Resources Management Plan 2009-2013	HDR/e2M	
FR-03102	Submitter - PN: 53602	2020	Laurie, Leroy, Gibson, Heather, and Carr, Paula Juelke	Cultural Resources Report for the Fresno-Yosemite International Airport Terminal Expansion/Remodel and East Terminal Apron Reconfiguration, Fresno, Fresno County, California	SWCA Environmental Consultants	

## **Tribal Consultation Documentation**





U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [aerieways@aol.com](mailto:aerieways@aol.com)

Ed Ketchum  
Vice Chairperson  
Amah Mutsun Tribal Band

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Vice Chairperson Ketchum:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

The City is the owner and operator of FAT and owns the ATCT facility. The City is proposing to implement the Proposed Project, which includes the following major components:

- Construct new airport traffic control tower (ATCT), including the Terminal Radar Approach Control Facilities (TRACON)
- Install new equipment in the replacement ATCT
- Extend utility services to the replacement ATCT
- Reconstruct existing parking lot for the replacement ATCT
- Install security fencing around the replacement ATCT facility
- Demolish the existing ATCT, including the TRACON
- Construction staging areas.

The FAA is the lead Federal Agency for Native American consultation for the Proposed Project. Your name and contact information were provided to us by the California Native American Heritage Commission. Tribal sovereignty, culture, traditional values, and customs will be respected at all times during the consultation process.

### **Consultation Initiation**

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to the Proposed Project. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources as project planning and alternatives are developed and refined. We are available to discuss the details of the proposed project with you.

### Project Information

The existing ATCT was commissioned in 1961 to support safe and efficient operation of the nation's airspace. The Proposed Project is needed to replace the existing ATCT facility, which no longer functions as intended and does not meet current building code requirements. The height of the existing ATCT is too low, which results in a partially obstructed line of sight due to the increased height of the nearby passenger terminal. Additionally, due to the facilities age, maintenance projects and costs increase each year, and it is not feasible to bring the facility up to current FAA and building code standards. The ATCT facility is also not adequately secured, which poses a security risk to operators responsible for the safety of the airspace. To address these needs, the Proposed Project would construct a new ATCT and TRACON that would comply with current FAA standards and requirements. The Proposed Project consists of construction of a new ATCT approximately 250 feet south of the existing ATCT (see Exhibit 1). The new facility would have an estimated building footprint of 13,000 square feet and include a base building at the base of the functional shaft of the tower and a control cab at the top of the functional shaft with an airport beacon and antennae atop the cab. Once the new ATCT is fully operational, the existing ATCT would be demolished. The Proposed Project also includes installation of utilities to the new ATCT, reconfiguration of the existing parking lot and extension of security fencing to enclose the ATCT facility and parking lot.

### Area of Potential Effect

All components and activities associated with the Proposed Project would occur within the Area of Potential Effect (APE). The APE includes the areas of direct (physical) and indirect (visual, atmospheric, and audible) impacts. The horizontal APE encompasses a total of 5.98 acres and includes the existing ATCT and TRACON, the adjacent employee parking lot, the airfield apron directly adjacent to the existing ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, a landscaped area south of the ARFF facility, and 1.78 acres of a vacant lot approximately 0.23 miles southwest of the existing ATCT off E. Andersen Avenue for use as a construction staging area (see Exhibit 2). The Airport maintenance building and the ARFF facility will not be modified by the Proposed Project. These two buildings are included in the APE due to their proximity to the project components and their age (over 45 years old) and will be included in the historic resource evaluation for the Proposed Project. The vertical APE extends from the existing ground surface to a depth of approximately 65 feet below ground surface (bgs) for the piles for foundations of the new ATCT.

### Confidentiality

We understand that you may have concerns about the confidentiality of information on areas or resources of traditional, religious, and cultural importance to your Tribe. We are available to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

### FAA Contact Information

Your timely response within 30-days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you wish to provide comments related to this proposed project, please contact me at the San Francisco Airports District Office by phone at (925) 546-6434 or by e-mail at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov).

Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport

Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)







U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [vjltestingcenter@aol.com](mailto:vjltestingcenter@aol.com)

Valentin Lopez  
Chairperson  
Amah Mutsun Tribal Band  
P.O. Box 5272  
Galt, CA 95632

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Lopez:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

The City is the owner and operator of FAT and owns the ATCT facility. The City is proposing to implement the Proposed Project, which includes the following major components:

- Construct new airport traffic control tower (ATCT), including the Terminal Radar Approach Control Facilities (TRACON)
- Install new equipment in the replacement ATCT
- Extend utility services to the replacement ATCT
- Reconstruct existing parking lot for the replacement ATCT
- Install security fencing around the replacement ATCT facility
- Demolish the existing ATCT, including the TRACON
- Construction staging areas.

The FAA is the lead Federal Agency for Native American consultation for the Proposed Project. Your name and contact information were provided to us by the California Native American Heritage Commission. Tribal sovereignty, culture, traditional values, and customs will be respected at all times during the consultation process.

### **Consultation Initiation**

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to the Proposed Project. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources as project planning and alternatives are developed and refined. We are available to discuss the details of the proposed project with you.

### Project Information

The existing ATCT was commissioned in 1961 to support safe and efficient operation of the nation's airspace. The Proposed Project is needed to replace the existing ATCT facility, which no longer functions as intended and does not meet current building code requirements. The height of the existing ATCT is too low, which results in a partially obstructed line of sight due to the increased height of the nearby passenger terminal. Additionally, due to the facilities age, maintenance projects and costs increase each year, and it is not feasible to bring the facility up to current FAA and building code standards. The ATCT facility is also not adequately secured, which poses a security risk to operators responsible for the safety of the airspace. To address these needs, the Proposed Project would construct a new ATCT and TRACON that would comply with current FAA standards and requirements. The Proposed Project consists of construction of a new ATCT approximately 250 feet south of the existing ATCT (see Exhibit 1). The new facility would have an estimated building footprint of 13,000 square feet and include a base building at the base of the functional shaft of the tower and a control cab at the top of the functional shaft with an airport beacon and antennae atop the cab. Once the new ATCT is fully operational, the existing ATCT would be demolished. The Proposed Project also includes installation of utilities to the new ATCT, reconfiguration of the existing parking lot and extension of security fencing to enclose the ATCT facility and parking lot.

### Area of Potential Effect

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)







U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [ledgerrobert@ymail.com](mailto:ledgerrobert@ymail.com)

Robert Ledger  
Chairperson  
Dumna Wo-Wah Tribal Government  
2191 West Pico Ave.  
Fresno, CA 93705

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Ledger:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

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- Demolish the existing ATCT, including the TRACON
- Construction staging areas.

The FAA is the lead Federal Agency for Native American consultation for the Proposed Project. Your name and contact information were provided to us by the California Native American Heritage Commission. Tribal sovereignty, culture, traditional values, and customs will be respected at all times during the consultation process.

### **Consultation Initiation**

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to the Proposed Project. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources as project planning and alternatives are developed and refined. We are available to discuss the details of the proposed project with you.

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [2deedominguez@gmail.com](mailto:2deedominguez@gmail.com)

Delia Dominguez  
Chairperson  
Kitanemuk & Yowlumne Tejon Indians  
115 Radio Street  
Bakersfield, CA 93305

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Dominguez:

### **Native American Consultation**

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [canutes@verizon.net](mailto:canutes@verizon.net)

Katherine Perez  
Chairperson  
Northern Valley Yokut / Ohlone Tribe  
P.O. Box 717  
Linden, CA 95236

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Perez:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport

Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)







U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [huskanam@gmail.com](mailto:huskanam@gmail.com)

Timothy Perez  
Tribal Compliance Officer  
Northern Valley Yokut / Ohlone Tribe  
P.O. Box 717  
Linden, CA 95236

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Mr. Perez:

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [fbeihn@nfr-nsn.gov](mailto:fbeihn@nfr-nsn.gov)

Fred Beihn  
Chairperson  
North Fork Rancheria of Mono Indians  
P.O. Box 929  
North Fork, CA 93643

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Beihn:

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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Western-Pacific Region  
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2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [mstalter@nfr-nsn.gov](mailto:mstalter@nfr-nsn.gov)

Mary Stalter  
Environmental/Heritage Manager  
North Fork Rancheria of Mono Indians  
P.O. Box 929  
North Fork, CA 93643

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Stalter:

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### Project Information

The existing ATCT was commissioned in 1961 to support safe and efficient operation of the nation's airspace. The Proposed Project is needed to replace the existing ATCT facility, which no longer functions as intended and does not meet current building code requirements. The height of the existing ATCT is too low, which results in a partially obstructed line of sight due to the increased height of the nearby passenger terminal. Additionally, due to the facilities age, maintenance projects and costs increase each year, and it is not feasible to bring the facility up to current FAA and building code standards. The ATCT facility is also not adequately secured, which poses a security risk to operators responsible for the safety of the airspace. To address these needs, the Proposed Project would construct a new ATCT and TRACON that would comply with current FAA standards and requirements. The Proposed Project consists of construction of a new ATCT approximately 250 feet south of the existing ATCT (see Exhibit 1). The new facility would have an estimated building footprint of 13,000 square feet and include a base building at the base of the functional shaft of the tower and a control cab at the top of the functional shaft with an airport beacon and antennae atop the cab. Once the new ATCT is fully operational, the existing ATCT would be demolished. The Proposed Project also includes installation of utilities to the new ATCT, reconfiguration of the existing parking lot and extension of security fencing to enclose the ATCT facility and parking lot.

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### FAA Contact Information

Your timely response within 30-days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you wish to provide comments related to this proposed project, please contact me at the San Francisco Airports District Office by phone at (925) 546-6434 or by e-mail at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov).

Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport

Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)







U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [hairey@chukchansi-nsn.gov](mailto:hairey@chukchansi-nsn.gov)

Heather Airey  
Tribal Historic Preservation Officer  
Picayune Rancheria of the Chukchansi Indians  
P.O. Box 2226  
Oakhurst, CA 93644

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Airey:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

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- Demolish the existing ATCT, including the TRACON
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### Consultation Initiation

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [council@chukchansi-nsn.gov](mailto:council@chukchansi-nsn.gov)

Tracey Hopkins  
Chairperson  
Picayune Rancheria of the Chukchansi Indians  
P.O. Box 2226  
Oakhurst, CA 93644

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Hopkins:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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**Federal Aviation  
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Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
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Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [spowers@tachi-yokut-nsn.gov](mailto:spowers@tachi-yokut-nsn.gov)

Shana Powers  
Tribal Historic Preservation Officer  
Santa Rosa Rancheria Tachi Yokut Tribe  
P.O. Box 8  
Lemoore, CA 93245

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Powers:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport

Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)







U.S Department  
of Transportation  
**Federal Aviation  
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Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [smccarty@tachi-yokut-nsn.gov](mailto:smccarty@tachi-yokut-nsn.gov)

Samantha McCarty  
Cultural Specialist II  
Santa Rosa Rancheria Tachi Yokut Tribe  
P.O. Box 8  
Lemoore, CA 93245

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Ms. McCarty:

### **Native American Consultation**

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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July 1, 2024

VIA EMAIL [nescalone@tachi-yokut-nsn.gov](mailto:nescalone@tachi-yokut-nsn.gov)

Nichole Escalon  
Cultural Specialist I  
Santa Rosa Rancheria Tachi Yokut Tribe  
P.O. Box 8  
Lemoore, CA 93245

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Escalon:

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [mhcordova@tmr.org](mailto:mhcordova@tmr.org)

Michelle Heredia-Cordova  
Chairperson  
Table Mountain Rancheria  
P.O. Box 410  
Friant, CA 93626

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Heredia-Cordova:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

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- Demolish the existing ATCT, including the TRACON
- Construction staging areas.

The FAA is the lead Federal Agency for Native American consultation for the Proposed Project. Your name and contact information were provided to us by the California Native American Heritage Commission. Tribal sovereignty, culture, traditional values, and customs will be respected at all times during the consultation process.

### **Consultation Initiation**

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to the Proposed Project. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources as project planning and alternatives are developed and refined. We are available to discuss the details of the proposed project with you.



### Project Information

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### Area of Potential Effect

All components and activities associated with the Proposed Project would occur within the Area of Potential Effect (APE). The APE includes the areas of direct (physical) and indirect (visual, atmospheric, and audible) impacts. The horizontal APE encompasses a total of 5.98 acres and includes the existing ATCT and TRACON, the adjacent employee parking lot, the airfield apron directly adjacent to the existing ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, a landscaped area south of the ARFF facility, and 1.78 acres of a vacant lot approximately 0.23 miles southwest of the existing ATCT off E. Andersen Avenue for use as a construction staging area (see Exhibit 2). The Airport maintenance building and the ARFF facility will not be modified by the Proposed Project. These two buildings are included in the APE due to their proximity to the project components and their age (over 45 years old) and will be included in the historic resource evaluation for the Proposed Project. The vertical APE extends from the existing ground surface to a depth of approximately 65 feet below ground surface (bgs) for the piles for foundations of the new ATCT.

### Confidentiality

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### FAA Contact Information

Your timely response within 30-days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you wish to provide comments related to this proposed project, please contact me at the San Francisco Airports District Office by phone at (925) 546-6434 or by e-mail at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov).

Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport

Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)







U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [rpennell@tmr.org](mailto:rpennell@tmr.org)

Bob Pennell  
Cultural Resource Director  
Table Mountain Rancheria  
P.O. Box 410  
Friant, CA 93626

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Mr. Pennell:

### **Native American Consultation**

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [davealvarez@sbcglobal.net](mailto:davealvarez@sbcglobal.net)

David Alvarez  
Chairperson  
Traditional Choinumni Tribe  
2415 E. Houston Avenue  
Fresno, CA 93720

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Alvarez:

### **Native American Consultation**

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





U.S Department  
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Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [neil.peyron@tulerivertribe-nsn.gov](mailto:neil.peyron@tulerivertribe-nsn.gov)

Neil Peyron  
Chairperson  
Tule River Indian Tribe  
P.O. Box 589  
Porterville, CA, 93258

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Peyron:

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport

Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)







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Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [kerri.vera@tulerivertribe-nsn.gov](mailto:kerri.vera@tulerivertribe-nsn.gov)

Kerri Vera  
Environmental Department  
Tule River Indian Tribe  
P.O. Box 589  
Porterville, CA, 93258

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Vera:

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport



Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





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July 1, 2024

VIA EMAIL [joey.garfield@tulerivertribe-nsn.gov](mailto:joey.garfield@tulerivertribe-nsn.gov)

Joey Garfield  
Tribal Archaeologist  
Tule River Indian Tribe  
P.O. Box 589  
Porterville, CA, 93258

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Mr. Garfield:

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Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
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Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





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2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

July 1, 2024

VIA EMAIL [kwood8934@aol.com](mailto:kwood8934@aol.com)

Kenneth Woodrow  
Chairperson  
Wuksachi Indian Tribe/Eshom Valley Band  
1179 Rock Haven Ct.  
Salinas, CA, 93906

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Chairperson Woodrow:

### **Native American Consultation**

The Federal Aviation Administration (FAA) and the City of Fresno (City), will be preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969, as amended, for the Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport).

The City is the owner and operator of FAT and owns the ATCT facility. The City is proposing to implement the Proposed Project, which includes the following major components:

- Construct new airport traffic control tower (ATCT), including the Terminal Radar Approach Control Facilities (TRACON)
- Install new equipment in the replacement ATCT
- Extend utility services to the replacement ATCT
- Reconstruct existing parking lot for the replacement ATCT
- Install security fencing around the replacement ATCT facility
- Demolish the existing ATCT, including the TRACON
- Construction staging areas.

The FAA is the lead Federal Agency for Native American consultation for the Proposed Project. Your name and contact information were provided to us by the California Native American Heritage Commission. Tribal sovereignty, culture, traditional values, and customs will be respected at all times during the consultation process.

### **Consultation Initiation**

With this letter, the FAA is seeking input on concerns that uniquely or significantly affect your Tribe related to the Proposed Project. Early identification of Tribal concerns, or known properties of traditional, religious, and cultural importance, will allow the FAA to consider ways to avoid or minimize potential impacts to Tribal resources as project planning and alternatives are developed and refined. We are available to discuss the details of the proposed project with you.



### Project Information

The existing ATCT was commissioned in 1961 to support safe and efficient operation of the nation's airspace. The Proposed Project is needed to replace the existing ATCT facility, which no longer functions as intended and does not meet current building code requirements. The height of the existing ATCT is too low, which results in a partially obstructed line of sight due to the increased height of the nearby passenger terminal. Additionally, due to the facilities age, maintenance projects and costs increase each year, and it is not feasible to bring the facility up to current FAA and building code standards. The ATCT facility is also not adequately secured, which poses a security risk to operators responsible for the safety of the airspace. To address these needs, the Proposed Project would construct a new ATCT and TRACON that would comply with current FAA standards and requirements. The Proposed Project consists of construction of a new ATCT approximately 250 feet south of the existing ATCT (see Exhibit 1). The new facility would have an estimated building footprint of 13,000 square feet and include a base building at the base of the functional shaft of the tower and a control cab at the top of the functional shaft with an airport beacon and antennae atop the cab. Once the new ATCT is fully operational, the existing ATCT would be demolished. The Proposed Project also includes installation of utilities to the new ATCT, reconfiguration of the existing parking lot and extension of security fencing to enclose the ATCT facility and parking lot.

### Area of Potential Effect

All components and activities associated with the Proposed Project would occur within the Area of Potential Effect (APE). The APE includes the areas of direct (physical) and indirect (visual, atmospheric, and audible) impacts. The horizontal APE encompasses a total of 5.98 acres and includes the existing ATCT and TRACON, the adjacent employee parking lot, the airfield apron directly adjacent to the existing ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, a landscaped area south of the ARFF facility, and 1.78 acres of a vacant lot approximately 0.23 miles southwest of the existing ATCT off E. Andersen Avenue for use as a construction staging area (see Exhibit 2). The Airport maintenance building and the ARFF facility will not be modified by the Proposed Project. These two buildings are included in the APE due to their proximity to the project components and their age (over 45 years old) and will be included in the historic resource evaluation for the Proposed Project. The vertical APE extends from the existing ground surface to a depth of approximately 65 feet below ground surface (bgs) for the piles for foundations of the new ATCT.

### Confidentiality

We understand that you may have concerns about the confidentiality of information on areas or resources of traditional, religious, and cultural importance to your Tribe. We are available to discuss these concerns and develop procedures to ensure the confidentiality of such information is maintained.

### FAA Contact Information

Your timely response within 30-days of receipt of this correspondence will greatly assist us in incorporating your concerns into project planning. If you wish to provide comments related to this proposed project, please contact me at the San Francisco Airports District Office by phone at (925) 546-6434 or by e-mail at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov).

Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport

Exhibit 1: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 2: Proposed Area of Potential Effect (APE)





**From:** [Valentin Lopez](#)  
**To:** [Jacobson, Nani M \(FAA\)](#)  
**Subject:** Re: Native American Consultation Initiation - Proposed Air Traffic Control Tower Replacement at Fresno Yosemite International Airport  
**Date:** Tuesday, July 2, 2024 7:58:01 AM

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**CAUTION:** This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Project is outside our traditional territory, we have no comments.  
Val

On Monday, July 1, 2024 at 02:55:03 PM PDT, Jacobson, Nani M (FAA) <nani.m.jacobson@faa.gov> wrote:

Dear Chairperson Lopez:

The Federal Aviation Administration is initiating consultation with the Amah Mutsun Tribal Band regarding a proposed Air Traffic Control Tower Replacement project at Fresno Yosemite International Airport. The attached letter provides project information and graphic depictions of the proposed project study area and Area of Potential Effect. I am available to answer any questions that you may have regarding the proposed project at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov) or (925) 546-6435.

Sincerely,

***Nani M. Jacobson, M.Sc.***

Environmental Protection Specialist, SFO-ADO

Federal Aviation Administration, Western Pacific Region

2999 Oak Rd, Suite 200

Walnut Creek, CA 94597

Phone: 925-546-6434



U.S Department  
of Transportation

**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

### **Phone Log/ Conversation - Section 106 Tribal Consultation**

**Subject:** Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

**Purpose of Call:** The Federal Aviation Administration (FAA) and the City of Fresno (City) are preparing federal environmental documentation under the National Environmental Policy Act (NEPA) of 1969 and Section 106 of the National Historic Preservation Act, for the proposed replacement of the Airport Traffic Control Tower (ATCT) at the Fresno Yosemite International Airport (FAT or Airport). FAT is located in the City and County of Fresno. The Proposed Project is not on tribal land and is not a traditional cultural property<sup>1</sup>.

The FAA is the lead Federal agency for Government-to-Government consultation, and the City is the Airport sponsor (Sponsor). This phone call continues Government-to-Government consultation initiated with FAA's letter dated July 1, 2024 which included the draft Area of Potential Effect and request for input on concerns that uniquely or significantly affect your Tribe related to the Proposed Project.

FAA has recommended the ATCT as eligible for listing on the National Register for Historic Places. The proposed project would replace, then demolish, this historic property. Pursuant to 36 CFR Part 800.5, the proposed demolition of the ATCT will adversely affect the building from being eligible for listing on the National Register of Historic Places (NRHP). Potential measures to avoid, minimize, or mitigate the adverse effect to the existing ATCT were considered. Alternatives to demolition of the existing ATCT were evaluated and dismissed due to factors including safety, feasibility, and ongoing maintenance requirements and associated costs. Therefore, FAA, in coordination with the City and consulting parties, developed a draft Memorandum of Agreement (MOA) to identify minimization and mitigation measures. The MOA is a legally binding document that outlines the minimization and mitigation stipulations for the demolition of the existing ATCT and resolution of the adverse effects related to the proposed undertaking.

FAA is seeking continued consultation on the determination of eligibility, proposed finding of adverse effect and draft MOA for resolution of the adverse effect related to the proposed undertaking. The draft MOA will be included for agency, tribal and public review as an appendix to the draft Environmental Assessment (EA), being prepared under NEPA. The draft EA is anticipated to be issued for review in early summer 2025. Pursuant to 36 CFR §800.8, the FAA intends to complete the Section 106 process in conjunction with the NEPA process.

I can provide project documentation, including the Cultural Resources Assessment and the draft MOA, to you for review. Additionally, I will notify you of the issuance of the Draft EA, which includes documentation on the determination of eligibility, adverse effect finding and Draft MOA.

---

<sup>1</sup> [NPS QuickGuide TCP.pdf](#)

**1. North Fork Rancheria of Mono Indians**

**Date of Call:** 05/05/2025

**Time of Call:** 3:45 PM

**Duration:** 2 Minutes

**Participants:** Fred Beihn, Chairperson; Nani Jacobson, SFO ADO

**Feedback and Questions:** Left detailed voicemail to call me back if he'd like to discuss the proposed project further.

**Next Steps:** None.

**2. North Fork Rancheria of Mono Indians**

**Date of Call:** 05/05/2025

**Time of Call:** 12:45 PM

**Duration:** 10 Minutes

**Participants:** Daniel Aguayo, Environmental/Heritage Manager; Nani Jacobson, SFO ADO

**Feedback and Questions:** Mr. Aguayo has taken the position of Ms. Stalter and did not receive the initial notification emailed to Ms. Stalter on 7/1/2024. Reviewed information above. Mr. Aguayo will expedite his review and response.

**Next Steps:** Send initial notification and additional information completed since then. Initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/5/2025.

**3. Picayune Rancheria of the Chukchansi Indians**

**Date of Call:** 05/05/2025

**Time of Call:** 3:50 PM

**Duration:** 5 Minutes

**Participants:** Heather Airey, Tribal Historic Preservation Officer; Nani Jacobson, SFO ADO

**Feedback and Questions:** Reviewed information above. Ms. Airey requested the initial notification letter to be resent. I offered to also send additional information completed since last July.

**Next Steps:** Send initial notification and additional information completed since then. Initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/5/2025.

**4. Picayune Rancheria of the Chukchansi Indians**

**Date of Call:** 05/05/2025

**Time of Call:** 4:00 PM

**Duration:** 5 Minutes

**Participants:** Tricia, Assistant to Tracey Hopkins, Chairperson; Nani Jacobson, SFO ADO

**Feedback and Questions:** Reviewed information above. Tricia requested the initial notification letter to be resent. I offered to also send additional information completed since last July.

**Next Steps:** Send initial notification and additional information completed since then. Initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/5/2025.

**5. Santa Rosa Rancheria Tachi Yokut Tribe**

**Date of Call:** 05/05/2025

**Time of Call:** 4:20 PM

**Duration:** 10 Minutes

**Participants:** Nichole Escalon, Tribal Historic Preservation Officer; Nani Jacobson, SFO ADO

**Feedback and Questions:** Ms. Escalon took over as the THPO from Ms. Powers. Reviewed information above. Ms. Escalon requested the initial notification letter to be resent. I offered to also send additional information completed since last July. Based on the location of the airport, she believes the tribe will defer to Table Mountain Rancheria, however she will review the



information. Copy Samantha McCarty, Cultural Resources Specialist, on the email communication.

**Next Steps:** Send initial notification and additional information completed since then. Initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/5/2025.

**6. Table Mountain Rancheria**

**Date of Call:** 05/06/2025

**Time of Call:** 1:15 PM]

**Duration:** 5 Minutes

**Participants:** Venessa Cabrera, Assistant to Michelle Heredia-Cordova, Chairperson; Nani Jacobson, SFO ADO

**Feedback and Questions:** Reviewed information above. Vanessa requested the initial notification letter to be resent. I offered to also send additional information completed since last July.

**Next Steps:** Send initial notification and additional information completed since then. Initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/6/2025.

**7. Table Mountain Rancheria**

**Date of Call:** 05/06/2025

**Time of Call:** 9:00 AM

**Duration:** N/A

**Participants:** Bob Pennell, Cultural Resource Director; Nani Jacobson, SFO ADO

**Feedback and Questions:** Was not able to connect through the phone.

**Next Steps:** Resent initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/6/2025.

**8. Tule River Indian Tribe**

**Date of Call:** 05/06/2025

**Time of Call:** 10:30 AM

**Duration:** N/A

**Participants:** Neil Peyron, Chairperson; Nani Jacobson, SFO ADO

**Feedback and Questions:** No answer, no voicemail.

**Next Steps:** Resent initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/6/2025.

**9. Tule River Indian Tribe**

**Date of Call:** 05/06/2025

**Time of Call:** 10:35 AM

**Duration:** N/A

**Participants:** Kerri Vera, Environmental Department; Nani Jacobson, SFO ADO

**Feedback and Questions:** No answer, no voicemail.

**Next Steps:** Resent initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/6/2025.

**10. Tule River Indian Tribe**

**Date of Call:** 05/06/2025

**Time of Call:** 10:40 AM

**Duration:** N/A

**Participants:** Joey Garfield, Tribal Archaeologist; Nani Jacobson, SFO ADO

**Feedback and Questions:** No answer, no voicemail.

**Next Steps:** Resent initial consultation email, Cultural Resources Assessment and draft MOA emailed on 5/6/2025.

## **SHPO Consultation Documentation**





U.S Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

August 19, 2024

Julianne Polanco  
California State Historic Preservation Officer  
Office of Historic Preservation  
Department of Parks and Recreation 1  
725 23rd Street, Suite 100  
Sacramento, CA 95816-7100

VIA EMAIL: [CALSHPO.ohp@parks.ca.gov](mailto:CALSHPO.ohp@parks.ca.gov)  
Attention: Mr. Tristan Tozer

Subject: Proposed Air Traffic Control Tower Replacement Project at Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Polanco:

The Federal Aviation Administration (FAA) is initiating National Historic Preservation Act, Section 106 consultation with you regarding the Proposed Air Traffic Control Tower Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT/Airport). The FAA and City and County of Fresno (City) are preparing an Environmental Assessment under the National Environmental Policy Act (NEPA) of 1969, as amended. The FAA is the lead Federal Agency for NEPA and Section 106 of the National Historic Preservation Act, and the City is the Airport Sponsor.

The City, as the owner and operator of FAT and the ATCT facility, is seeking FAA approval of an Airport Layout Plan (ALP)<sup>1</sup> for the proposed development. FAA ALP approval is a federal undertaking as defined in 36 CFR §800.16(y). Therefore, the FAA is initiating consultation with the State Historic Preservation Officer (SHPO) pursuant to §800.3(c)(3) and is requesting concurrence with FAA's delineation of the proposed Areas of Potential Effects (APE) as defined in §800.16(d).

#### Airport Location and Proposed Project Information

The Airport is located within the city of Fresno, approximately five miles northeast of downtown Fresno and adjacent to the city of Clovis. The Airport is accessed from the south via East Clinton Way. Major roadways near the Airport include State Route (SR) 168 to the west and SR 180 to the south. Exhibit 1 shows the Airport location.

The existing ATCT was commissioned in 1961 to support safe and efficient operation of the nation's airspace. Exhibit 2 shows the location of the existing ATCT on the airport. The Proposed Project is needed to replace the existing ATCT facility, which no longer functions as intended and does not meet current building code requirements. The height of the existing ATCT is too low, which results in a partially obstructed line of sight due to the increased height of the nearby passenger terminal. Additionally, due to the facilities age, maintenance projects and costs increase each year, and it is not feasible to bring the facility up to current FAA and building code standards. The ATCT facility is also not adequately secured, which poses a security risk to operators responsible for the safety of the airspace.

To address these needs, the Proposed Project would construct a new ATCT and TRACON that would comply with current FAA standards and requirements. The Proposed Project consists of construction of a new ATCT approximately 250 feet south of the existing ATCT (see Exhibit 3). The new facility would have an estimated building footprint of 13,000 square feet and include a base building at the base of the functional shaft of the tower and a control cab at the top of the functional shaft with an airport beacon and antennae atop the cab. Once the new ATCT is fully operational, the existing ATCT would be demolished. The Proposed Project also includes installation of utilities to the new ATCT, reconfiguration of the existing parking lot and extension of security fencing to enclose the ATCT facility and parking lot.

#### Area of Potential Effects

All components and activities associated with the Proposed Project would occur within the Area of Potential Effects (APE). The APE includes the areas of direct (physical) and indirect (visual, atmospheric, and audible) impacts (see Exhibit 4). The horizontal APE encompasses a total of 5.98 acres and includes the existing ATCT and TRACON, the adjacent employee parking lot, the airfield apron directly adjacent to the existing ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, a landscaped area south of the ARFF facility, and 1.78 acres of a vacant lot approximately 0.23 miles southwest of the existing ATCT off E. Andersen Avenue for use as a construction staging area. The Airport maintenance building and the ARFF facility will not be modified by the Proposed Project. These two buildings are included in the APE due to their proximity to the project components and their age (over 45 years old) and will be included in the historic resource evaluation for the Proposed Project. The vertical APE extends from the existing ground surface to a depth of approximately 65 feet below ground surface (bgs) for the piles for foundations of the new ATCT.

FAA seeks concurrence with the APE within 30 days of receipt of this letter. Your attention to this matter is appreciated. If you have questions or concerns, please contact me at the San Francisco Airports District Office by phone at (925) 546-6434 or by e-mail at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov).

Sincerely,

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures

Cc:  
Francisco Partida, Fresno Yosemite International Airport  
Karin Boulter, RS&H

Exhibit 1: Airport Location





[illegible]



Exhibit 3: Proposed New Airport Traffic Control Tower



Source: RS&H, 2024



Exhibit 4: Proposed Area of Potential Effect (APE)







**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000

FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov

[www.ohp.parks.ca.gov](http://www.ohp.parks.ca.gov)

September 10, 2024

Reply in Reference To: FAA\_2024\_0819\_001

*Submitted Via Electronic Mail*

Nani Michelle Jacobson  
Environmental Protection Specialist  
Federal Aviation Administration  
Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office  
2000 Oak Road, Suite 200  
Walnut Creek, CA 94597

Re: Proposed Air Traffic Control Tower Replacement Project, Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Jacobson:

The Federal Aviation Administration (FAA) is initiating consultation with the State Historic Preservation Officer (SHPO) in order to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulations at 36 CFR Part 800. The FAA is requesting SHPO comments on the proposed Area of Potential Effects (APE) for the above-referenced undertaking. In addition to your August 19, 2024 letter, you have provided aerial images of the proposed APE.

The City of Fresno, as the owner and operator of Fresno Yosemite International Airport (FAT), is seeking FAA approval of an Airport Layout Plan for the proposed development of FAT. As part plan, the existing Air Traffic Control Tower (ATCT) and Terminal Radar Approach Control (TRACON) facilities will be demolished and replaced.

The APE includes the areas of direct (physical) and indirect (visual, atmospheric, and audible) impacts. The horizontal APE encompasses a total of 5.98 acres and includes the existing ATCT and TRACON, the adjacent employee parking lot, the airfield apron directly adjacent to the existing ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, a landscaped area south of the ARFF facility, and 1.78 acres of a vacant lot approximately 0.23 miles southwest of the existing ATCT off E. Andersen Avenue for use as a construction staging area. The Airport maintenance building and the ARFF facility will not be modified as part of the undertaking. These two buildings are included in the APE due to their proximity to the project components and their age (over 45 years old) and will be included in the historic resource evaluation for the undertaking. The vertical APE extends from the existing

ground surface to a depth of approximately 65 feet below ground surface for the piles for foundations of the new ATCT.

Having reviewed your submittal, please consider the following comment:

- The APE, as described in your letter and shown on images included with said letter, appears adequately delineated to account for direct and indirect effects to historic properties.

If you have any questions or comments, please contact staff historian Tristan Tozer at (916) 894-5499 or [Tristan.Tozer@parks.ca.gov](mailto:Tristan.Tozer@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a horizontal line.

Julianne Polanco  
State Historic Preservation Officer



U.S Department  
of Transportation

**Federal Aviation  
Administration**

Western-Pacific Region  
San Francisco Airports Division Office

Federal Aviation Administration  
2000 Oak Road, Suite 200  
Walnut Creek, CA 94597

September 13, 2024

Ms. Julianne Polanco  
State of California  
State Historic Preservation Officer  
Office of Historic Preservation  
1725 23rd Street, Suite 100,  
Sacramento, California 95816-7100

VIA EMAIL: [CALSHPO.ohp@parks.ca.gov](mailto:CALSHPO.ohp@parks.ca.gov)  
Attention: Mr. Tristan Tozer

Dear Ms. Polanco:

**Proposed Airport Traffic Control Tower Replacement Project  
Fresno Yosemite International Airport  
Fresno, Fresno County, California  
Section 106 Coordination  
Reference: FAA\_2024\_0819\_001**

The City of Fresno (City) and the Federal Aviation Administration (FAA) are preparing federal environmental documentation for the proposed replacement of the Airport Traffic Control Tower (ATCT) at the Fresno Yosemite International Airport (FAT or Airport). FAT is located in the City and County of Fresno. Your office previously concurred with FAA's Area of Potential Effect by letter dated August 19, 2024.

FAA is providing the following background information to assist you in reviewing FAA's determinations of eligibility and findings of effect related to the proposed undertaking.

**1. Background Information.**

The City and FAA are preparing an environmental assessment for the proposed undertaking under the National Environmental Policy Act of 1969. The Federal action is approval of the City's Airport Layout Plan and approval of an application for federal funding assistance for the proposed undertaking.

The proposed project is needed to address numerous operational, safety and security issues with the existing ATCT, as described in our August 19, 2024 letter. To address these needs, the proposed project includes the following components:

- Construction of a new ATCT facility and demolition of the existing ATCT facility once the new ATCT facility is fully operational,



- Installation of new equipment in the replacement ATCT and utility services to the replacement ATCT facility, and
- Reconstruction of the existing employee parking and installation of security fencing around the ATCT facility and accompanying employee parking lot.

All components are located within the APE.

## **2. Native American Consultation.**

On May 10, 2024, FAA received a listing of Native American contacts for the proposed undertaking from the California Native American Heritage Commission. The Commission recommended FAA contact 11 Tribes: two representatives from the Amah Mutsun Tribal Band; one representative from the Dumna Wo-Wah Tribal Government; one representative from the Kitanemuk & Yowlumne Tejon Indians; two representatives from the North Fork Rancheria of Mono Indians; two representatives from the Northern Valley Yokut / Ohlone Tribe; two representatives from the Picayune Rancheria of the Chukchansi Indians; three representatives from the Santa Rosa Rancheria Tachi Yokut Tribe; two representatives from Table Mountain Rancheria; one representative from the Traditional Choinumni Tribe; three representatives from the Tule River Indian Tribe; and one representative from the Wuksachi Indian Tribe/Eshom Valley Band.

On July 1, 2024, FAA provided detailed information about the Area of Potential Effects (APE) and the proposed undertaking to the email addresses provided by the Commission for the tribal contacts listed above. FAA received one response from Chairperson Valentin Lopez of the Amah Mutsun Tribal Band stating the proposed project is outside of the tribes traditional territory and they have no comments. No other comments from Native American Tribes have been received by FAA for the proposed undertaking.

## **3. National Register Eligibility Determinations.**

LSA, based in California, the City's archaeological and historic resources consultant, was tasked to identify and evaluate the proposed undertaking's effect on historic properties. LSA prepared the enclosed *Cultural Resources Assessment, Fresno Yosemite International Airport, Airport Traffic Control Tower Replacement Implementation*, dated September 2024.

On June 17, 2024, the cultural resources record search was completed for the APE by staff at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield. It included a review of all recorded historic and prehistoric archaeological sites and known cultural resource reports within 0.5 mile of the APE. The SSJVIC reports there are no records of any archaeological or historic architectural resources within the APE or within 0.5 mile of the APE.

While the SSJVIC did not report any previously recorded historic architectural resources within the APE for the proposed undertaking, LSA's architectural field survey identified three historic-period buildings located within the APE: the ATCT; the Aircraft Rescue and Fire Fighting Facility (ARFF); and the Maintenance Building, all completed in the early 1960's. None of these three sites have been assigned Primary numbers by the SSJVIC or recorded on Department of Parks and Recreation (DPR) forms.

The Significance Evaluation of these structures begins on page 36 of the Cultural Resources Assessment. The Cultural Resources Assessment evaluation of these three resources notes these buildings were among the first five buildings constructed at the airport in the early 1960s and were designed by master architect Allen Y. Lew. The Cultural Resources Assessment evaluates each structure under the four criteria for evaluation as defined in 36 CFR 60.4 and finds the ATCT is significant under Criteria C as a highly intact representative example of the International style of architecture as applied to an airport traffic control tower. In addition, it is the work of master architect Allen Y. Lew, FAIA, and is a good example of the simplicity and restraint that was the hallmark of his designs from that early period of his career. The ARFF and the Maintenance Building are not representative of any architectural style or characteristics and are not eligible for listing in the NRHP.

Based on the information contained within the Cultural Resources Assessment, the FAA determined the ATCT **is eligible** for listing on the National Register of Historic Places (NRHP), under Criterion C, and the ARFF and Maintenance Facility are **not eligible** for inclusion in the NRHP.

**FAA seeks the California SHPO's concurrence with these determinations.**

#### **4. Assessment of Adverse Effects on Historic Properties.**

Pursuant to Section 106 of the NHPA (36 CFR Part 800.5), the proposed demolition of the ATCT **will adversely affect** the building from being eligible for listing on the NRHP under 36 CFR Part 800.5(a)(1). Since the ARFF facility and maintenance building are not historic properties under Section 106 of the NHPA, the proposed undertaking **will not adversely affect** these buildings.

**FAA seeks the California SHPO's concurrence with these findings.**

We request your written concurrence with our determination of eligibility and finding of effect within 30-days of receipt of this letter. Should we not hear from your office within 30-days, pursuant 36 CFR 800.5(c)(1) we will consider a no reply as concurrence with FAA's determination and findings for the proposed undertaking and will continue consultation under 36 CFR 800.6(a).

If you have any further questions about this matter, please call me at (925) 546-6434.

Sincerely,

Nani Jacobson  
Environmental Protection Specialist

Enclosures: Cultural Resources Assessment – dated September 2024

Cc:  
Francisco Partida, Fresno Yosemite International Airport  
Karin Boulter, RS&H



**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov [www.ohp.parks.ca.gov](http://www.ohp.parks.ca.gov)

October 24, 2024

Reply in Reference To: FAA\_2024\_0819\_001

*Submitted Via Electronic Mail*

Nani Michelle Jacobson  
Environmental Protection Specialist  
Federal Aviation Administration  
Western-Pacific Region  
Office of Airports  
San Francisco Airports District Office  
2000 Oak Road, Suite 200  
Walnut Creek, CA 94597

Re: Finding of Effect, Proposed Air Traffic Control Tower Replacement Project, Fresno  
Yosemite International Airport, Fresno County, California

Dear Ms. Jacobson:

The Federal Aviation Administration (FAA) is continuing consultation with the State Historic Preservation Officer (SHPO) in order to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulations at 36 CFR Part 800. The FAA is requesting SHPO concurrence with three determinations of eligibility and an adverse effect finding. In addition to your September 13, 2024 letter, you have provided the following cultural resource assessment in support of the undertaking:

- *Cultural Resources Assessment, Fresno Yosemite International Airport, Air Traffic Control Tower Replacement Implementation, City of Fresno, Fresno County, California* (LSA: September 2024)

In previous consultation, SHPO agreed that the FAA's delineation of the Area of Potential Effects (APE) for the undertaking was of a sufficient scale to account for direct and indirect effects to historic properties. The FAA has since evaluated three properties in the APE: the Air Traffic Control Tower (ATCT), Aircraft Rescue and Fire Fighting Facility (ARFF), and the Maintenance Building. The Cultural Resources Assessment notes that these buildings were among the first five buildings constructed at the airport in the early 1960s and were designed by master architect Allen Y. Lew. The Cultural Resources Assessment concludes that the ATCT is eligible for listing on the National Register of Historic Places (NRHP) under Criteria C as a highly intact representative example of the International Style of architecture as applied to an airport traffic control tower. In addition, it is the work of master architect Allen Y. Lew, FAIA, and is a good example of the simplicity and restraint that was the hallmark of his designs from that



early period of his career. The ARFF and the Maintenance Building are not representative of any architectural style or characteristics and are not eligible for listing in the NRHP.

The FAA consulted with Native American tribes identified by the California Native American Heritage Commission as potentially have additional cultural knowledge of the project area, as summarized in your letter. The FAA received one response from Chairperson Valentin Lopez of the Amah Mutsun Tribal Band stating the proposed project is outside of the tribe's traditional territory and they have no comments. No other comments were received.

The negative results of the records search and the level of disturbance (ranging from 5 to 25 feet in depth, which likely removed any subsurface resources from the APE) suggest a very low sensitivity for in situ archaeological resources.

Having reviewed your submittal, please consider the following comment:

- SHPO concurs that the ATCT is eligible for listing on the NRHP.
- SHPO concurs that the ARFF and Maintenance Building are ineligible for listing on the NRHP.
- SHPO concurs that the demolition of the ATCT will adversely affect historic properties.

SHPO understands that the FAA will continue consultation under 36 CFR § 800.6 (a). If you have any questions or comments, please contact staff historian Tristan Tozer at (916) 894-5499 or [Tristan.Tozer@parks.ca.gov](mailto:Tristan.Tozer@parks.ca.gov).

Sincerely,



Julianne Polanco  
State Historic Preservation Officer

**Advisory Council on Historic  
Preservation Consultation**



**Advisory Council on Historic Preservation  
Electronic Section 106 Documentation Submittal System (e106) Form  
MS Word format**

**Send to: *e106@achp.gov***

**Please review the instructions at [www.achp.gov/e106-email-form](http://www.achp.gov/e106-email-form) prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.**

**I. Basic information**

**1. Purpose of notification.** Indicate whether this documentation is to:

- ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☒ Invite the ACHP to participate in a Section 106 consultation
- ☐ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☐ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☐ Other, please describe

[Click here to enter text.](#)

**2. ACHP Project Number** (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): NA

**3. Name of federal agency** (If multiple agencies, list them all and indicate whether one is the lead agency):

Federal Aviation Administration (FAA)

**4. Name of undertaking/project** (Include project/permit/application number if applicable):

Airport Traffic Control Tower (ATCT) Replacement Project at Fresno Yosemite International Airport (FAT)

**5. Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

FAT is owned and operated by the City of Fresno (City) and is located in Fresno, Fresno County, California.

**6. Name and title of federal agency official and contact person for this undertaking**, including email address and phone number:

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 ☐ Washington, DC 20001-2637

Phone: 202-517-0200 ☐ Fax: 202-517-6381 ☐ [achp@achp.gov](mailto:achp@achp.gov) ☐ [www.achp.gov](http://www.achp.gov)



Federal Aviation Administration  
 Western-Pacific Region, San Francisco Airports Division Office  
[Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov)  
 (925) 546-6434

## II. Information on the Undertaking\*

**7. Describe the undertaking and nature of federal involvement** (if multiple federal agencies are involved, specify involvement of each):

### Proposed Project Description

The Federal Aviation Administration (FAA), as the lead federal agency, is examining the environmental impacts due to the Proposed Airport Traffic Control Tower (ATCT) Replacement Project at Fresno Yosemite International Airport (FAT) (Proposed Project). The Proposed Project and its associated actions are subject to the National Historic Preservation Act (NHPA) and its implementing regulations under 36 Code of Federal Register (CFR) part 800 (as amended) as well as the National Environmental Policy Act (NEPA). In accordance with 36 CFR § 800.8, the FAA is intending to complete Section 106 in conjunction with the NEPA process.

The Proposed Project would construct a new ATCT facility at FAT that would comply with current FAA standards and requirements. The Proposed Project consists of construction of a new ATCT approximately 250 feet south of the existing ATCT. The new facility would have an estimated building footprint of 13,000 square feet and include a base building at the base of the functional shaft of the tower and a control cab at the top of the functional shaft with an airport beacon and antennae atop the cab. Once the new ATCT is fully operational, the existing ATCT would be demolished. The Proposed Project also includes installation of utilities to the new ATCT, reconfiguration of the existing parking lot and extension of security fencing to enclose the ATCT facility and parking lot.

### Federal Involvement

This project is seeking FAA approval of an Airport Layout Plan (ALP) and federal funding for portions of the Proposed Project; therefore, it is an undertaking subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966.

## **8. Describe the Area of Potential Effects (APE):**

All components and activities associated with the Proposed Project would occur within the Area of Potential Effects (APE). The APE includes the areas of direct (physical) and indirect (visual, atmospheric, and audible) impacts (see **Attachment 1**). The horizontal APE encompasses a total of 5.98 acres the existing ATCT and TRACON, the adjacent employee parking lot, the airfield apron directly adjacent to the existing ATCT, an airport maintenance building, the Aircraft Rescue and Fire Fighting (ARFF) facility, a landscaped area south of the ARFF facility. It also includes a 1.78 acres vacant lot approximately 0.23 miles southwest of the existing ATCT off E. Andersen Avenue for use as a construction staging area. The Airport maintenance building and the ARFF facility will not be modified by the Proposed Project. These two buildings are included in the APE due to their proximity to the project components and their age (over 45 years old) and will be included in the historic resource evaluation for the Proposed Project. The vertical APE extends from the existing ground surface to a depth of approximately 65 feet below ground surface (bgs) for the piles for foundations of the new ATCT.

On July 1, 2024, FAA provided detailed information about the APE and the Proposed Project to 11 tribes. No comments were received on the APE (see **Attachment 5**). Consultation was initiated with the California State Historic Preservation Officer (SHPO) on August 19, 2024, and concurrence requested for

the APE. SHPO concurred with the recommended APE on September 10, 2024 (see **Attachment 2**).

## **9. Describe steps taken to identify historic properties:**

A Cultural Resources Assessment for the Proposed Project was completed by LSA Associates, Inc., in September 2024. The Cultural Resources Assessment is included in **Attachment 3**.

On June 17, 2024, the cultural resources record search was completed for the APE by staff at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield. It included a review of all recorded historic and prehistoric archaeological sites and known cultural resource reports within 0.5 mile of the APE. The SSJVIC reports there are no records of any archaeological or historic architectural resources within the APE or within 0.5 mile of the APE.

While the SSJVIC did not report any previously recorded historic architectural resources within the APE for the proposed undertaking, LSA's architectural field survey identified three historic-period buildings located within the APE: the ATCT; the Aircraft Rescue and Fire Fighting Facility (ARFF); and the Maintenance Building, all completed in the early 1960's. None of these three sites have been assigned Primary numbers by the SSJVIC or recorded on Department of Parks and Recreation (DPR) forms.

The Cultural Resources Assessment evaluation of these three resources notes these buildings were among the first five buildings constructed at the airport in the early 1960s and were designed by master architect Allen Y. Lew. The Cultural Resources Assessment evaluates each structure under the four criteria for evaluation as defined in 36 CFR 60.4 and finds the ATCT is significant under Criteria C as a highly intact representative example of the International style of architecture as applied to an airport traffic control tower. In addition, it is the work of master architect Allen Y. Lew, FAIA, and is a good example of the simplicity and restraint that was the hallmark of his designs from that early period of his career. The ARFF and the Maintenance Building are not representative of any architectural style or characteristics and are not eligible for listing in the NRHP.

Based on the information contained within the Cultural Resources Assessment, the FAA determined the ATCT is eligible for listing on the National Register of Historic Places (NRHP), under Criterion C, and the ARFF and Maintenance Facility are not eligible for inclusion in the NRHP.

## **10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):**

See Attachments 1 through 4:

Attachment 1: Section 106 Consultation Documentation to SHPO, August 19, 2024

Attachment 2: Section 106 Consultation Documentation to FAA, September 10, 2024

Attachment 3: Section 106 Consultation Documentation to SHPO (includes the Cultural Resources Assessment), September 13, 2024

Attachment 4: Section 106 Consultation Documentation to FAA, October 24, 2024

## **11. Describe the undertaking's effects on historic properties:**

Based on the enclosed information of the Proposed Project, the FAA determined that a Section 106 finding of *Adverse Effect* is applicable for the Proposed Project. As part of the Proposed Project the historic property, the existing ATCT, would be demolished once the replacement ATCT becomes operational. The FAA provided the adverse effect finding for the ATCT to SHPO on September 13, 2024 (see **Attachment 3**) and SHPO concurred with the FAA's finding on October 24, 2024 (see **Attachment 4**).

**12. Explain how this undertaking would adversely affect historic properties** (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

The Proposed Project would demolish the existing ATCT, which is eligible for listing on the NRHP under Criterion C. In compliance with Section 106 requirements, potential measures to avoid, minimize, or mitigate adverse impacts to the existing ATCT were considered. Accordingly, FAA, in coordination with SHPO, consulting parties, and the City, are developing a Memorandum of Agreement (MOA) to document the commitment, both by statute and by federal regulation, of the FAA and the City to carry out the undertaking in accordance with the terms of the agreement in satisfaction of its responsibilities under Section 106. The MOA includes the mitigation that is agreed upon by all consulting parties and the SHPO to resolve adverse effects of the Proposed Project.

**13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public,** including any correspondence from the SHPO and/or THPO.

See Attachments:

Attachment 2: Section 106 Consultation Documentation to FAA, September 10, 2024

Attachment 4: Section 106 Consultation Documentation to FAA, October 24, 2024

Attachment 5: Tribal Consultation Documentation, July 1, 2024

### **III. Additional Information**

**14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation.** Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

The FAA consulted with the following 11 tribal communities on the Proposed Project and APE during the Section 106 process: two representatives from the Amah Mutsun Tribal Band; one representative from the Dumna Wo-Wah Tribal Government; one representative from the Kitanemuk & Yowlumne Tejon Indians; two representatives from the North Fork Rancheria of Mono Indians; two representatives from the Northern Valley Yokut / Ohlone Tribe; two representatives from the Picayune Rancheria of the Chukchansi Indians; three representatives from the Santa Rosa Rancheria Tachi Yokut Tribe; two representatives from Table Mountain Rancheria; one representative from the Traditional Choinumni Tribe; three representatives from the Tule River Indian Tribe; and one representative from the Wuksachi Indian Tribe/Eshom Valley Band. One response was received from Chairperson Valentin Lopez of the Amah Mutsun Tribal Band stating the proposed project is outside of the tribe's traditional territory and they have no comments. See **Attachment 5** for documentation of Tribal Consultation completed to date.

The FAA initiated consultation with SHPO on August 19, 2024, with review and concurrence of the APE. Consultation continued with review of the Cultural Resources Assessment and concurrence on the determination of eligibility and adverse effect finding. SHPO concurred with both on October 24, 2024. FAA and the City held a consultation with SHPO on November 18, 2024, and no unresolved concerns or issues were raised.

The FAA invited two parties to provide comments on the Draft MOA as consulting parties The City of Fresno Historic Preservation Commission (HPC) and the Fresno County Historical Society (FCHS). The Proposed Project was introduced to the HPC during the California State environmental review process, prior to initiating Section 106, and the HPC provided initial comments on the scope of the Proposed



Project. The City also initiated contact with the FCHS to develop mitigation measures that would result in preparing and placing an exhibit detailing the history of the existing ATCT and its architect at the FCHS's Fresno Republican Printery Building in Fresno, California. No unresolved concerns or issues were raised. The FAA and the City will continue to coordinate with these two parties and SHPO to finalize mitigation measures and the MOA.

City of Fresno Historic Preservation Commission  
 2600 Fresno Street, Room 3065  
 Fresno, CA 93721  
[\(559\) 621-8439](tel:(559)621-8439)  
[historic.preservation@fresno.gov](mailto:historic.preservation@fresno.gov)

Fresno County Historical Society  
 7160 West Kearney Blvd.  
 Fresno, CA 93706  
[\(559\) 441-0862](tel:(559)441-0862)  
[elaval@valleyhistory.org](mailto:elaval@valleyhistory.org)

**15. Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:**

Section 106 documentation will be available on the FAT website as part of the issuance of the Draft Environmental Assessment (EA) for public and agency review, anticipated for release in early to mid-2025.

**16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:**

No. However, the Proposed Project is listed on the Federal Infrastructure Projects Permitting Dashboard as a Project: [Fresno Yosemite International Airport - Airport Traffic Control Tower \(ATCT\) Replacement | Permitting Dashboard](#)

**The following are attached to this form (check all that apply):**

- ☒ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☒ Additional historic property information
- ☒ Consulting party list with known contact information
- ☐ Other: [Click here to enter text.](#)



December 20, 2024

Nani M. Jackson  
Environmental Protection Specialist  
Federal Aviation Administration  
2999 Oak Road  
Suite 200  
Walnut Creek, CA 94597

Ref: *Airport Traffic Control Tower Replacement at Fresno Yosemite International Airport  
City of Fresno, Fresno County, California  
ACHP Project Number: 021886*

Dear Ms. Jackson:

On December 5, 2024, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the California SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact Bill Marzella at (202) 517-0209 or by e-mail at

bmarzelle@achp.gov and reference the ACHP Project Number above.

Sincerely,

A handwritten signature in cursive script, reading "Lucrecia Brooks", enclosed within a rectangular border.

Lucrecia Brooks  
Historic Preservation Technician  
Office of Federal Agency Programs



## **Draft Memorandum of Agreement**

**MEMORANDUM OF AGREEMENT  
BETWEEN  
THE FEDERAL AVIATION ADMINISTRATION (FAA) AND THE CALIFORNIA STATE  
HISTORIC PRESERVATION OFFICER (SHPO)  
REGARDING THE  
REPLACEMENT OF THE AIRPORT TRAFFIC CONTROL TOWER (ATCT) AT FRESNO  
YOSEMITE INTERNATIONAL AIRPORT, FRESNO, CALIFORNIA**

**WHEREAS**, the Federal Aviation Administration (FAA) and the City of Fresno (City) are proposing to replace the Airport Traffic Control Tower (ATCT) (Undertaking) at the Fresno Yosemite International Airport (FAT); and

**WHEREAS**, the City is requesting that the FAA approve a proposed revision to the FAT Airport Layout Plan and intends to seek federal funding support for implementation of the Undertaking; and

**WHEREAS**, the FAA and the City determined the existing ATCT has exceeded its useful life and found no viable use for the specialized structure; and

**WHEREAS**, the Undertaking is the construction of a new ATCT and demolition of the existing ATCT once the new ATCT is fully operational; and

**WHEREAS**, the FAA is responsible for completing the requirements of Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, 54 United States Code (U.S.C.) § 306108, and its implementing regulations, 36 Code of Federal Regulations (CFR) § 800; and

**WHEREAS**, in letters dated July 1, 2024, the FAA initiated consultation with 11 tribal communities identified by the Native American Heritage Commission (NAHC) and provided the draft Area of Potential Effects (APE) for review under the Section 106 process and no comments were received on the draft APE. Documentation of outreach to tribal communities is located in Attachment 3; and

**WHEREAS**, the FAA determined and documented the APE for the Undertaking in consultation with the SHPO in accordance with 36 C.F.R. § 800.4(a). A map of the APE is located in Attachment 1; and

**WHEREAS**, the ATCT is eligible for listing in the National Register of Historic Places (NRHP) under Criterion C as a highly intact representative example of the International style of architecture as applied to an airport traffic control tower. The eligibility recommendation was concurred on by the SHPO in a letter dated October 24, 2024. The cultural resources assessment with eligibility determination and SHPO concurrence with the eligibility determination are located in Attachment 2; and

**WHEREAS**, the FAA determined that the Undertaking would result in an *adverse effect* to the ATCT and consulted with the SHPO pursuant to 36 CFR 800.6(a)(1). The determination was concurred on by the SHPO in a letter dated October 24, 2024. The finding of adverse effect and SHPO concurrence with the finding of adverse effect are located in Attachment 2; and

**WHEREAS**, in letters dated December 5, 2024, the FAA contacted the City of Fresno Historic Preservation Commission (HPC), within the purview of the City's Planning Department, and the

Fresno County Historical Society (FCHS) to invite them to participate in the NHPA Section 106 consultation pursuant to 36 CFR § 800.3(f)(3). FAA notified HPC and FCHS of the *adverse effect* finding and requested input on this finding and the draft Agreement. The consulting party letters submitted to HPC and FCHS are located in Attachment 4; and

**WHEREAS**, the HPC responded on January 7, 2025, and provided comments requesting: that Stipulations in the Agreement be modified to include a detailed acknowledgement of the historical and civic context in which the ATCT was constructed; expansion of the stipulations to include community engagement, educational outreach, and an expansion of details on Allen Y. Lew's broader body of work in Fresno; commitment to preservation of archival materials, photographs, and any salvaged architectural elements for public display; and ongoing engagement with Native American tribes; and

**WHEREAS**, the FCHS provided comments: that they are eager to collaborate on the exhibit under Stipulation IV; they can incorporate the exhibit into the permanent Chinese artifact exhibit; request alternatives that avoid demolition of the tower; and request salvaging some of the existing ATCT to include in the exhibit at FCHS. The responses and input from HPC and FCHS are located in Attachment 4; and

**WHEREAS**, the following Stipulations in the Agreement were modified in coordination with the City to include relevant and feasible input from the HPC and FCHS: (1) language was added to Stipulation III that says that salvaged architectural elements of the existing ATCT would be included, if feasible; (2) additional language stating that educational materials collected during exhibit development would be submitted to the FCHS was added to Stipulation IV.; and (3) language specific to Native American resources was added to Stipulation VIII.; and

**WHEREAS**, FAA notified the Advisory Council on Historic Preservation (ACHP) of the *adverse effect* finding and invited the ACHP to participate in the NHPA Section 106 consultation pursuant to 36 CFR § 800.6(a)(1)(i)(A). The ACHP responded on December 20, 2024, and declined to participate; and

**WHEREAS**, the SHPO is authorized to enter into this Agreement in order to fulfill its role of advising and assisting federal agencies in carrying out their responsibilities under Section 106 of the NHPA, as amended, 54 U.S.C. 306108 and pursuant to 36 CFR Part 800, the regulations implementing NHPA Section 106, at 36 CFR §§ 800.2(c)(1)(i) and 800.6(b); and

**WHEREAS**, an Environmental Assessment (EA) is being prepared under the National Environmental Policy Act of 1969 (NEPA). Pursuant to 36 CFR § 800.8(c)(1)(iv), the FAA intends to involve the public in accordance with the NEPA process; and

**NOW THEREFORE**, the FAA and SHPO, collectively referred to as Signatories, agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the Undertaking on historic properties and further agree that these stipulations shall govern the Undertaking and all of its parts until this Agreement expires or is terminated.

## **STIPULATIONS**

The FAA, in coordination with the City, will ensure that the following stipulations are carried out:

### **I. Professional Qualification Standards**



The City will ensure that all actions prescribed by this Agreement are carried out by, or under the direct supervision of, qualified professional(s) who meet the appropriate standards in the applicable disciplines as outlined in the *Secretary of the Interior's Professional Qualifications Standards* (36 CFR § 61).

## II. Historic American Building Survey Documentation of the ATCT

- A. The City will prepare documentation of the ATCT to meet modified Historic American Building Survey (HABS) Level II standards. The HABS Level II standards are defined in the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. Level II documentation will include:
  - 1. High resolution, archival-quality photographs will be taken to document the ATCT's present appearance. Major structural and decorative details will be photographed using large-format black and white film and processed following the National Park Service guidelines for prints;
  - 2. A written report will be created to describe the history and architecture, following the outline format for HABS Level II documentation;
  - 3. A U.S. Geological Survey topographic map will identify the location of the ATCT; and
  - 4. A copy of the as-built drawings.
- B. The City will submit a draft of the modified HABS Level II documentation electronically to the SHPO. The SHPO will have 30 calendar days upon receipt to review and comment on a draft of the documentation.
- C. Upon acceptance of the draft documentation by the SHPO, or determination by the SHPO that the documentation is sufficient, demolition of the ATCT may commence.
- D. Within 45 days of the acceptance of the draft documentation by the SHPO, final documentation, including archival prints of photo documentation, will be provided to the SHPO by the City. Final print documentation will be printed on archival paper, and negatives will be provided to the SHPO. The City will provide digital files to the SHPO, the Fresno County Historical Society, and the Fresno County Public Library.
- E. The final documentation will be submitted to the HABS Collection in the Library of Congress.

## III. Interpretive Signage

- A. To provide educational information to the public upon completion of the ATCT demolition, and for its use and purpose within the airport, the City will design and install interpretive signage detailing the history of the ATCT, as well as the history of FAT.

- B. The City will develop the interpretive signage content and design, in consultation with SHPO. The interpretive sign will include narrative historic context, historic photographs, and, if feasible, salvaged architectural elements of the existing ATCT.
- C. The City will submit a draft design plan for the interpretive sign to SHPO electronically. The draft design plan will include, but is not limited to, information on size, location, materials, design, and content of the interpretive sign. SHPO will have 30 calendar days to provide comments on the draft design plan. If SHPO does not provide comments within 30 calendar days, the City will note that there was no response from SHPO and proceed according to the submitted plan.
- D. The City will consult with SHPO to address comments provided in accordance with Stipulation III.B and submit a final design plan electronically for SHPO comment. SHPO will have 30 calendar days to accept or ask for clarification, additional information or recommend changes to final design plan.
- E. The City will install the interpretive sign within the passenger terminal building. The final location of the interpretive sign will be determined by the City.

IV. Exhibit and Educational Materials with the Fresno County Historical Society (FCHS)

- A. To provide educational information to the public upon completion of the ATCT demolition, the City will work with FCHS to design and install an exhibit at the Republican Printery Co. Building detailing the history of the ATCT, focusing on the history and importance of the ATCT as an International style building designed by the prominent architect, Allen Y. Lew.
- B. The City will develop the exhibit content and design, in consultation with SHPO and FCHS. The exhibit will include narrative historic context and historic photographs.
- C. The City will submit a draft design plan for the exhibit to SHPO electronically. The draft design plan will include, but is not limited to, information on size, location, materials, design, and content of the exhibit. SHPO will have 30 calendar days to provide comments on the draft design plan. If SHPO does not provide comments within 30 calendar days, the City will note that there was no response from SHPO and proceed according to the submitted plan.
- D. The City will consult with SHPO to address comments provided in accordance with Stipulation IV.B and submit a final design plan electronically for SHPO comment. SHPO will have 30 calendar days to accept or ask for clarification, additional information or recommend changes to final design plan.
- E. The City will install the exhibit within the Republican Printery Co. Building at 2130 Kern Street, Fresno, CA 93721. The final location of the exhibit will be determined through coordination with the City and FCHS.
- F. The City will provide educational materials collected during the exhibit development process to FCHS electronically for FCHS to incorporate the ATCT's legacy into any educational programs they provide.

V. Preparation of the City Website Information

To provide educational information to the public, the City will prepare a historic context for posting to the City website. The historic context will discuss the development of the ATCT and the background and importance of the architect who designed the ATCT.

VI. Dispute Resolution

- A. Should the Signatories object within 30 days to any plans or other documents provided by the City or others for review pursuant to this Agreement, or to any actions proposed or initiated by the City pursuant to this Agreement, the City shall consult with the objecting party to resolve the objection. If the City determines that the objection cannot be resolved, the City shall forward all documentation relevant to the dispute to the FAA. The FAA will notify and consult with the Signatories to resolve the objection within 30-calendar days
- B. If the objection is resolved during the 30-calendar day consultation period, the FAA will document the resolution and proceed in accordance with the terms of each resolution.
- C. If the FAA determines the objection cannot be resolved, the FAA shall forward all documentation relevant to the dispute to the ACHP. Within 30-calendar days after receipt of all pertinent documentation, the ACHP will:
  1. Provide FAA with recommendations, which the FAA will take into account in reaching a final decision regarding the dispute. Prior to reaching a final decision on the dispute, FAA, shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the Signatories to this Agreement, and provide ACHP and Signatories with a copy of the written response. The FAA will then proceed according to its final decision.
  2. If the ACHP does not provide its advice regarding the dispute within 30-calendar days, the FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching a final decision, the FAA will prepare a written response that takes into account any timely comments regarding the dispute from the Signatories and will provide the ACHP and Signatories a copy of the written response. The FAA will then proceed according to its final decision.
  3. The FAA's responsibility to carry out all other actions subject to the terms of this Agreement that are not subject of the dispute remain unchanged.

VII. Amendments

- A. Any Signatory to this Agreement may request that this Agreement be amended, whereby the parties will consult to consider whether such revision is necessary, pursuant to 36 CFR. § 800.6(c)(7).
- B. The Agreement may be amended only upon the written agreement of the Signatories. FAA shall file a copy of the amended Agreement with the ACHP, as required by 36 CFR § 800.6(c)(7). Review periods for amendments shall not exceed 30-calendar days.



#### VIII. Inadvertent Discoveries

In the event that a previously unidentified resource is encountered during this undertaking, or if an unanticipated effect to a known historic property results from the undertaking, the City will halt activities in the vicinity of the resource and notify the FAA. The FAA shall comply with 36 CFR 800.13(b) by notifying the SHPO and invite comment from signatories to the Agreement. In the case of prehistoric or historic Native American sites, the FAA shall notify appropriate state and federally recognized tribal leaders. The agency's notifications will include a description of unanticipated effects, an eligibility recommendation or a proposed schedule for assessing eligibility, and if appropriate, a process to resolve potential adverse effects.

#### IX. Monitoring and Reporting

Each year following the execution of this Agreement, until it expires or is terminated, the City will provide all Signatories with a summary report detailing the implementation/completion of the Undertaking and Stipulations. The reporting will include any notable coordination successes or problems encountered.

#### X. Termination of Agreement

- A. If any signatory to this Agreement determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment. If within 30 calendar days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the Agreement upon written notification to the other signatories.
- B. Once the Agreement is terminated, and prior to work continuing on the undertaking, FAA must either (a) execute an Agreement pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FAA shall notify the signatories as to the course of action it will pursue.

#### XI. Duration

The effective date of this Agreement shall be the date of the last signature by a signatory. Unless amended in accordance with Stipulation VII or terminated in accordance with Stipulation X, this Agreement will remain in effect for five years. If the terms of this Agreement are not carried out within five (5) years following its date of execution by the Signatory Parties, the FAA will consult with the other parties to this Agreement to reconsider its terms at least six months prior to such time. Reconsideration may include the continuation of the Agreement as originally executed, amendment of the Agreement in accordance with Stipulation VII above, or termination. In the event of termination, the FAA will notify the other Agreement parties in writing and, if it chooses to continue with the Undertaking, shall reinitiate review of the Undertaking in accordance with 36 CFR Part 800.

**MEMORANDUM OF AGREEMENT  
BETWEEN  
THE FEDERAL AVIATION ADMINISTRATION (FAA) AND THE CALIFORNIA STATE  
HISTORIC PRESERVATION OFFICER (SHPO)  
REGARDING THE  
REPLACEMENT OF THE AIRPORT TRAFFIC CONTROL TOWER (ATCT) AT FRESNO  
YOSEMITE INTERNATIONAL AIRPORT, FRESNO, CALIFORNIA**

Execution of this Agreement, filing of the Agreement with the ACHP pursuant to 36 CFR § 800.6(b)(1)(iv), and the implementation of its terms is evidence that the FAA has taken into account the effects of the Undertaking on historic properties protected under Section 106 of NHPA and has afforded the ACHP an opportunity to comment on the Undertaking pursuant to that Act.

SIGNATORY PARTY:

FEDERAL AVIATION ADMINISTRATION  
Federal Lead Agency

By: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name:

**MEMORANDUM OF AGREEMENT  
BETWEEN  
THE FEDERAL AVIATION ADMINISTRATION (FAA) AND THE CALIFORNIA STATE  
HISTORIC PRESERVATION OFFICER (SHPO)  
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SIGNATORY PARTY:

CALIFORNIA STATE HISTORIC PRESERVATION OFFICER  
Federal Agency Compliance

By: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name:



**MEMORANDUM OF AGREEMENT  
BETWEEN  
THE FEDERAL AVIATION ADMINISTRATION (FAA) AND THE CALIFORNIA STATE  
HISTORIC PRESERVATION OFFICER (SHPO)  
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REPLACEMENT OF THE AIRPORT TRAFFIC CONTROL TOWER (ATCT) AT FRESNO  
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Execution of this Agreement, filing of the Agreement with the ACHP pursuant to 36 CFR § 800.6(b)(1)(iv), and the implementation of its terms is evidence that the FAA has taken into account the effects of the Undertaking on historic properties protected under Section 106 of NHPA and has afforded the ACHP an opportunity to comment on the Undertaking pursuant to that Act.

INVITED SIGNATORY:

CITY OF FRESNO  
Project Sponsor and State Lead Agency

By: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name:

**MEMORANDUM OF AGREEMENT  
BETWEEN  
THE FEDERAL AVIATION ADMINISTRATION (FAA) AND THE CALIFORNIA STATE  
HISTORIC PRESERVATION OFFICER (SHPO)  
REGARDING THE  
REPLACEMENT OF THE AIRPORT TRAFFIC CONTROL TOWER (ATCT) AT FRESNO  
YOSEMITE INTERNATIONAL AIRPORT, FRESNO, CALIFORNIA**

Execution of this Agreement, filing of the Agreement with the ACHP pursuant to 36 CFR § 800.6(b)(1)(iv), and the implementation of its terms is evidence that the FAA has taken into account the effects of the Undertaking on historic properties protected under Section 106 of NHPA and has afforded the ACHP an opportunity to comment on the Undertaking pursuant to that Act.

INVITED SIGNATORY:

FRESNO COUNTY HISTORICAL SOCIETY  
Consulting Party

By: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name:

FILED:

Advisory Council on Historic Preservation

By: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name:

DRAFT



**Consultation and Outreach for the  
Memorandum of Agreement**

## MEETING AGENDA: Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Relocation Section 106 Consultation

---

**Project:** FAT ATCT Relocation

**Meeting Date & Time:** November 18, 2024

**Meeting Place:** Microsoft Teams

**Participants:** Francisco Partida, FAT; Tristan Tozer, SHPO; Nani Jacobson, FAA; Karin Bouler, RS&H; Byron Chavez, RS&H; Dave Full, RS&H; Bart Gover, RS&H; Casey Tibbet, LSA Associates

**Subject:** FAT ATCT Section 106 Consultation

---

1. **Welcome and Introductions**
2. **Project Overview**
3. **APE, National Register Eligibility Determinations, Findings**
4. **Next Steps**
5. **Project Milestones**
6. **Proposed Mitigation**
7. **Action Items**

## MEETING MINUTES: Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Relocation Section 106 Consultation

---

**Project:** FAT ATCT Relocation

**Meeting Date & Time:** November 18, 2024, 11:00 am PST

**Meeting Place:** Microsoft Teams

**Participants:** Francisco Partida, FAT; Tristan Tozer, SHPO; Nani Jacobson, FAA; Karin Bouler, RS&H; Byron Chavez, RS&H; Dave Full, RS&H; Bart Gover, RS&H; Casey Tibbet, LSA Associates

**Subject:** FAT ATCT Section 106 Consultation

---

### 1. Welcome and Introductions

- Participants introduced themselves (see above identified participants).
- The meeting agenda was briefly reviewed (reference Attachment 1 for the PowerPoint slides).

### 2. Project Overview

#### Proposed Project

- A description of the Proposed Project was provided.
  - The Proposed Project would construct a new ATCT facility, install new equipment and utility connections, reconstruct the existing employee parking lot, and demolish the old ATCT.
- The construction of a new ATCT facility at FAT has been evaluated over the past 20 years. This is the first time that the effort has reached the environmental phase.

#### Purpose and Need

- The purpose and need of the Proposed Project is that the existing ATCT:
  - Does not meet current Standards: including ADA, Building Code, and FAA standards;
  - Is of inadequate height and has an obstructed line of sight to a portion of the airfield;
  - Is operationally deficient;
  - Has escalating maintenance costs associated with the outdated facilities; and
  - Is not a secure facility.
  - Maintain consistency with approved Airport plans, including the Master Plan.



- Francisco noted that the aging facilities result in personnel issues when the elevator breaks down because the elevator parts are no longer in production and have to be special ordered. Because several personnel are unable to safely climb six flights of stairs to reach the tower, they are unable to report to work while the elevator is down, resulting in strains on staffing levels. Additionally, given that the facility is no longer at FAA standards, the FAA will not enter into a long-term lease at the existing ATCT.

#### Alternatives Analysis

- A brief history of the various alternatives for the Proposed Project and the identified alternatives was presented and includes: the preferred alternative, four other locations at FAT, and the No Action Alternative.
- The Alternatives Analysis will be included in the Draft Environmental Assessment (EA) and in the Section 4(f) evaluation.

#### Area of Potential Effects (APE)

- The APE was described as including all elements identified under the Project Description.

### **3. APE, National Register Eligibility Determinations, Findings**

- The cultural report and finding of effect were summarized.
- The existing ATCT is eligible because of the International style of architecture and because of the architect who designed it, Allen Lew.
- The effect determination was that the Proposed Project would have an adverse effect.
- SHPO concurred with the APE on September 10, 2024.
- SHPO concurred with the finding of adverse effect on October 24, 2024.

### **4. Next Steps**

#### Section 106 Consultation

- A draft Memorandum of Agreement (MOA) that includes proposed mitigation is under development and will be the next submittal to SHPO.

#### Section 4(f) Evaluation Consultation

- Because the existing ATCT is eligible for listing on the National Register of Historic Places (NRHP), it is a Section 4(f) resource.
- There will be a “physical use” of the Section 4(f) resource (the existing ATCT) due to the demolition of the existing ATCT resulting in an adverse effect determination under Section 106.
- SHPO was notified that they are the Official with Jurisdiction (OWJ) under Section 4(f) because the existing ATCT is a historic property.
- The Section 4(f) evaluation will include the purpose and need, alternatives analysis to determine if there is no feasible and prudent alternative to avoid the “use” of the Section 4(f) property, and all possible planning to minimize harm.

- The Section 4(f) evaluation will be included as an appendix to the Draft EA and SHPO review will occur concurrently with the 45-day Public Draft EA comment period.
- The mitigation included in the MOA prepared during the Section 106 consultation process will be used to document the FAA and City's commitment to minimize harm.

## 5. Project Milestones

- Completed, in progress, and anticipated project milestones were reviewed.
- Draft MOA
  - Tristan clarified that prior to SHPO providing comments on the Draft MOA, they want to see that consultation and outreach has occurred to other interested parties (e.g., the City of Fresno, preservation groups, historical societies). The Draft MOA should include comments received and responses to those comments.
    - There is not a standard timeframe that is required for interested parties to respond, however discussed requesting 30 calendar days for comments. Comments received after the 30 days will be addressed and provided to SHPO, as appropriate.
    - Outreach will also go to the Advisory Council of Historic Preservation in Washington to see if they would like to participate in this consultation, though, they probably do not.
    - The SHPO's MOA review process ideally takes 30 days, but is dependent on workload and other factors. Under regulations there is no set review period or timeframe for resolution. SHPO advises that this could take a couple of rounds of review.
    - .
    - After SHPO submits comments to FAA, the MOA would be circulated to interested parties for another review, this could occur during the Draft EA comment period, depending on SHPO comments.
    - The Project will continue to seek efficiencies and promote transparency between Section 106 and NEPA processes.
- The Draft Environmental Assessment (EA) will include the Section 4(f) evaluation, which will be available for review by SHPO during the 45-day comment period. The anticipated release date of the Draft EA is February/March 2025.
- The Final EA and Finding of No Significant Impacts (FONSI) will be prepared following the close of the comment period on the Draft EA. The Final EA/FONSI is expected to be completed in July 2025.

## **6. Proposed Mitigation**

- Mitigation will continue to be coordinated with SHPO, the City's Historic Preservation Commission, and the Fresno County Historical Society (FCHS) through consultation on the draft MOA.
- Proposed mitigation measures for inclusion in the MOA were summarized and include:
  - Historic American Building Survey (HABS), Level II
  - Interpretive sign and plaque commemorating existing ATCT in FAT terminal
  - Exhibit with permanent Chinese artifacts exhibit that the FCHS is developing. The location would be in a building recently purchased by FCHS for the artifacts exhibit.
  - Website materials on FAT website and potentially on FCHS website with QR code to link it.
- SHPO commented that they like to see the public exhibits, however they will provide formal comments during their review.

## **7. Action Items**

- The FAA will provide the Draft MOA to interested parties for review and comment prior to submittal to SHPO.
- The Draft MOA will likely be submitted to SHPO after the interested party review, targeted for January 2025.
  - Another FAA consultation has been recently submitted to SHPO for review, so submittal in January should fit the SHPO review schedule well.
- Section 4(f) - Mitigation identified during the Section 106 consultation process and documented in the MOA will be included in the Section 4(f) evaluation to document the FAA and City's commitment to minimize harm, as required by Section 4(f).



November 18, 2024

# Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Relocation

Section 106 Consultation





# Agenda

1. Welcome and Introductions
2. Project Overview
3. APE, National Register Eligibility Determinations, Findings
4. Next Steps
5. Project Milestones
6. Proposed Mitigation
7. Action Items



# Welcome and Introductions

- Fresno Yosemite International Airport (FAT) / City of Fresno
- California State Historic Preservation Officer (SHPO)
- Federal Aviation Administration (FAA)
- RS&H California, Inc. (RS&H)
- LSA Associates, Inc. (LSA)



# Project Overview – Project Description

- The Proposed Project is for the replacement of the existing ATCT facility and associated infrastructure at the Airport.
- The Proposed Project includes the following components:
  - Construction of a new ATCT facility and demolition of the existing ATCT facility once the new ATCT facility is fully operational.
  - Installation of new equipment in the replacement ATCT and utility services to the replacement ATCT facility.
  - Reconstruction of the existing employee parking and installation of security fencing around the ATCT facility and accompanying employee parking lot.



# Project Overview – Purpose and Need



- The ATCT was commissioned in 1961 and has exceeded its useful life.
- Parts of the ATCT facility, including the elevator and HVAC system, no longer function as intended and/or no longer meet current building code requirements.
- Key Reasons why the existing ATCT needs to be replaced:
  1. Existing ATCT Does Not Meet Current Standards
  2. Inadequate Height and Obstructed Line of Sight
  3. Operation Deficiencies
  4. Escalating Maintenance Costs
  5. Security Deficiencies
  6. Consistency with Approved Plan

# Project Overview – Alternatives Analysis

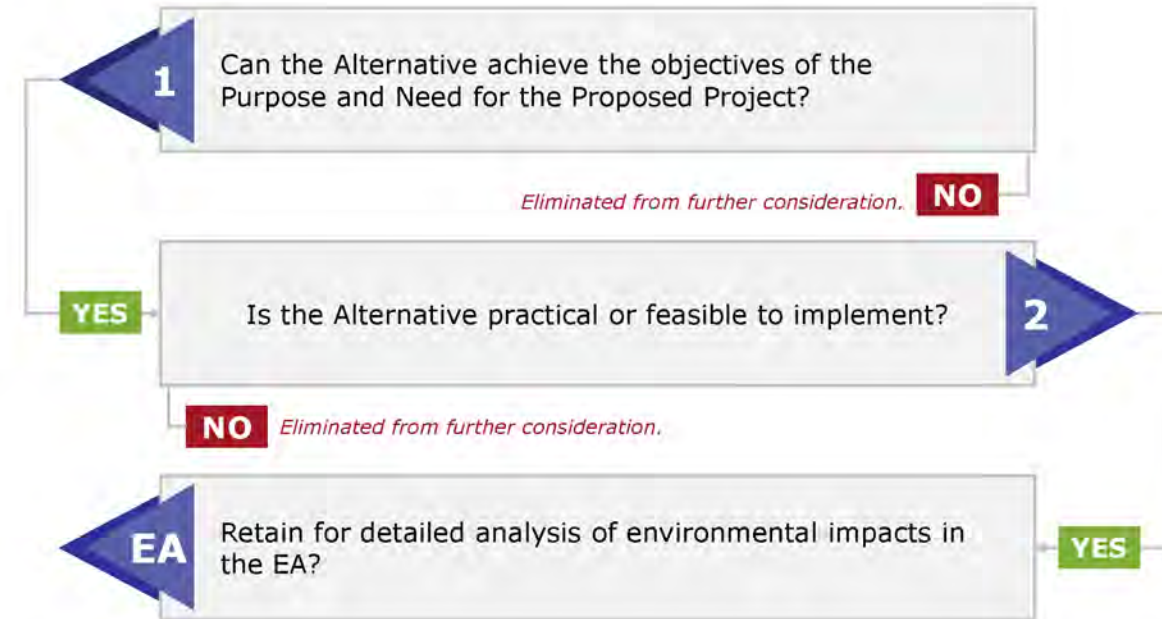


## – Alternatives to be Evaluated

- Preferred Alternative (Site X2)
- Rehabilitate Existing ATCT for Continued Use at FAT
- ATCT in other locations at FAT
  - 4 alternative locations
  - Keep existing ATCT for other use, preservation of existing ATCT in place, or demolish existing ATCT
- No Action
  - The existing ATCT remains and continues its existing use. Regular maintenance required.

## – Two-Step Screening Process

1. Does the alternative meet the purpose and need for the project?
  2. Is the alternative practical or feasible to implement?
- If yes to both, retain for detailed analysis of environmental impacts in the environmental assessment (EA)





# Project Overview – Area of Potential Effects (APE)



- SHPO concurrence received September 10, 2024
- The APE includes:
  - Areas of direct (physical) impacts
  - Areas of indirect (visual, atmospheric, and audible) impacts
- Horizontal APE:
  - Total of 5.98 acres
  - Existing ATCT facility
  - Adjacent employee parking lot
  - Airfield apron directly adjacent to ATCT
  - Airport Maintenance Building
  - Aircraft Rescue and Fire Fighting (ARFF) facility
  - Landscaped area south of ARFF
  - 1.78 acres of vacant lot for construction staging
- Vertical APE
  - Existing ground surface to a depth of 65 feet below ground surface (bgs)



# APE, National Register Eligibility Determinations, Findings



- Cultural Resources Report, prepared by LSA, completed in September 2024
  - Record search completed by staff at the Southern San Joaquin Valley Information Center (SSJVIC)
    - No records of any archaeological or historic architectural resources within the APE or within 0.5 mile of the APE
  - Architectural Field Survey
    - Existing ATCT
    - The Airport Maintenance Building
    - Aircraft Rescue and Fire Fighting (ARFF) Facility
  - Existing ATCT
    - Eligible for listing in the National Register of Historic Places (NRHP) under Criterion C
    - Highly intact representative of the International style of architecture as applied to an ATCT
    - Work of master architect Allen Y. Lew, FAIA
  - Airport Maintenance Building and ARFF Facility
    - Not representative of any architectural style or characteristics
    - Not eligible for listing in the NRHP
  - Pursuant to Section 106 of the NHPA (36 CFR Part 800.5), the proposed demolition of the ATCT will **adversely affect** the building from being eligible for listing on the NRHP under 36 CFR Part 800.5(a)(1).

# Next Steps



- Section 106 Consultation
  - Memorandum of Agreement – Review and approval by SHPO, FAA, and FAT/City
- Section 4(f) Evaluation and Consultation
  - Section 4(f) of the U.S. DOT Act of 1966 (49 U.S.C. § 303) protects significant publicly owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites.
  - Determination of “use” of Section 4(f) resources (existing ATCT)
    - Physical use = physical taking of Section 4(f) property through purchase of land or a permanent easement, physical occupation of a portion or all of the property, or alteration of structures or facilities on the property
    - The proposed demolition of the existing ATCT is an adverse effect on the historic resource under Section 106 = Section 4(f) physical use
  - Roles
    - FAA = federal lead agency, Section 4(f) lead
    - SHPO = official with jurisdiction (OWJ), review of Section 4(f) evaluation and approval of Section 4(f) with finding
    - Department of the Interior = Section 4(f) approval authority
    - FAT/City of Fresno = project sponsor
    - RS&H Team = document preparation and analysis



## Next Steps (2 of 2)



### – Section 4(f) Documentation and Consultation (continued)

- Section 4(f) Evaluation – prepared if there is a Section 4(f) “use”
  - Purpose and need for the project
  - Alternatives analysis to determine that there are no feasible and prudent alternatives to the use of the Section 4(f) property
    - Prudent and feasible alternative = one that avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property
  - The FAA may approve only the alternative meets the purpose and need and causes the least overall harm to the Section 4(f) property if there is no feasible and prudent alternative to the project.
  - Includes all measures to minimize harm, or mitigation measures
- Mitigation of potential adverse impacts to historic sites usually consists of measures necessary to preserve the historic integrity of the site and agreed to in accordance with 36 CFR part 800 by the FAA, the SHPO, and other consulting parties.
- Evaluation is included as an addendum to the EA.
- Public review is required – will occur concurrently with public review of Draft EA (45 days)
- Review by the Department of the Interior to occur concurrently with public review of Draft EA (45 days)

# Project Milestones – Completed



- May 10, 2024 – listing of Native American contacts received from the California Native American Heritage Commission [Tribal Consultation/Section 106]
- July 1, 2024 – consultation initiated with 11 tribes [Tribal Consultation/Section 106]
  - One response received from Chairperson Valentin Lopez of the Amah Mutsun Tribal Band stating the proposed project is outside of the tribe's traditional territory and they have no comments.
  - No other comments received.
- July 8, 2024 – Initiated preparation of Draft Environmental Assessment (EA) [National Environmental Policy Act (NEPA)]
- August 19, 2024 – APE submitted to SHPO for concurrence [Section 106]
- September 10, 2024 – SHPO concurred with APE [Section 106]
- September 13, 2024 – Request for concurrence with determination of eligibility and finding of effect submitted to SHPO [Section 106]
- October 24, 2024 – SHPO concurred with determination of eligibility and finding of effect [Section 106]

## Project Milestones – In Progress or Anticipated

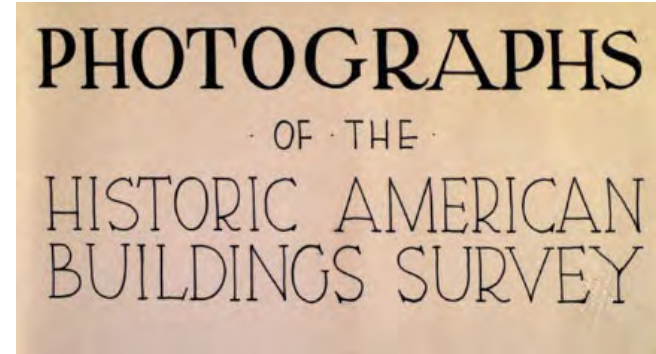


- November 18, 2024 – Initial consulting parties meeting [Section 106]
- December 2024 – Anticipated submittal of draft Memorandum of Agreement (MOA) for California State Historic Preservation Officer (SHPO) review [Section 106]
- January 2025 – Anticipated SHPO review of Draft MOA completed [Section 106]
- February-March 2025 – Anticipated release of Draft EA with Section 4(f) Evaluation and public comment period (45 days) [NEPA and Section 4(f)]
  - Includes SHPO and DOI review of Section 4(f) evaluation
- July 2025 – Anticipated Final EA / Finding of No Significant Impacts (FONSI) [NEPA and Section 4(f)]



# Proposed Mitigation

- Coordination on mitigation with SHPO, City's Historic Preservation Commission, and Fresno County Historical Society
- Develop Memorandum of Agreement (MOA) through continued consultation with SHPO
- MOA will include mitigation measures to address the adverse effect to the existing ATCT:
  - Measure 1: Historic American Building Survey (HABS), Level II
  - Measure 2: Interpretive sign and plaque commemorative of the existing ATCT in the FAT terminal
  - Measure 3: Include an exhibit with the permanent Chinese artifacts exhibit that the Fresno County Historical Society (FCHS) is developing. Location is at building newly purchased by FCHS for the Chinese artifacts exhibit.
  - Measure 4: FAT website materials
- Open Discussion



# Action Items



## – Next submittals and schedule:

- Early-mid December 2024 – submit Draft Memorandum of Agreement to SHPO
- Early 2025 – Release of Public Draft EA with Section 4(f) evaluation for public and agency comment

# Thank you

Nani Jacobson, M. Sc.  
Environmental Protection Specialist  
Federal Aviation Administration – SFO-ADO  
(925) 546-6434  
Nani.M.Jacobson@faa.gov

Francisco Partida  
Assistant Director of Aviation  
City of Fresno / Fresno Yosemite International Airport  
(559) 621-4500  
Francisco.Partida@fresno.gov







U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
San Francisco Airports Division Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

December 5, 2024

Historic Preservation Commission  
Chair James W. Sponsler  
City of Fresno  
2600 Fresno St., Room 3065  
Fresno, CA 93721

Via Email at: [historic.presevation@fresno.gov](mailto:historic.presevation@fresno.gov)

**Re: Invitation to Section 106 Consultation for the Fresno Yosemite International Airport (FAT)  
Airport Traffic Control Tower (ATCT) Replacement Project, Fresno, California**

Dear Chair Sponsler,

The Federal Aviation Administration (FAA) is in the process of consulting under Section 106 of the National Historic Preservation Act (NHPA) regarding the Proposed Airport Traffic Control Tower (ATCT) Replacement Project at Fresno Yosemite International Airport (FAT) (Proposed Project). The Proposed Project would address numerous operational, safety and security issues with the existing ATCT, as detailed in the August 19, 2024, letter from the FAA to the California State Historic Preservation Officer (SHPO) initiating Section 106 consultation (see Attachment 1). The Proposed Project includes construction of a new ATCT approximately 250 feet south of the existing ATCT and demolition of the existing ATCT (see Attachment 1, Exhibit 3).

The demolition of the existing ATCT is an “undertaking” subject to Section 106 and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.4, FAA determined the existing ATCT is eligible for listing on the National Register of Historic Places (NRHP) under Criterion C, Architecture, and demolition of the structure would adversely affect the building from being eligible for listing on the NHRP (see Attachment 3). In a letter dated October 24, 2024, SHPO concurred with FAA’s eligibility determination for the ATCT and *adverse effect* to the historic property (see Attachment 4).

In compliance with Section 106 requirements, potential measures to avoid, minimize, or mitigate adverse effects to the existing ATCT were considered. Alternatives to demolition of the existing ATCT were evaluated and dismissed due to factors including safety, feasibility, and ongoing maintenance requirements and associated costs. Therefore, FAA, in coordination with the City of Fresno (City), developed a Draft Memorandum of Agreement (MOA) to identify minimization and mitigation measures. The MOA is a legally binding document that outlines the minimization and mitigation stipulations for the demolition of the existing ATCT.

FAA and the City identified you as potentially having an interest in the undertaking. Pursuant to 36 CFR § 800.2(c) and § 800.3(f), the FAA is inviting you to participate in the Section 106 consultation process as a consulting party. As a consulting party, your organization has the opportunity to provide input to the FAA regarding the historic property. The FAA is seeking your input on the *adverse effect* finding for the ATCT. Attachment 3 provides a summary of the *adverse effect* finding and the full Cultural Resources Assessment. Additionally, FAA is providing the Draft MOA to your organization for input prior to submittal to SHPO and the public for review and comment (see Attachment 5). Should you determine your organization does not want to be a consulting party, FAA will continue to coordinate with you during the planning phase of the Proposed Project.

The Proposed Project and its associated activities are also subject to the National Environmental Policy Act (NEPA). The FAA is preparing an Environmental Assessment (EA) to evaluate potential impacts on the human environment from the Proposed Project. The FAA will notify you when the Draft EA is issued for public and agency comment. Pursuant to 36 CFR § 800.8, the FAA intends to complete the Section 106 process in conjunction with the NEPA process.

Your timely response within 30 days of receipt of this correspondence will greatly assist us in completing the Section 106 and NEPA processes. In your response, please include your organization's response to becoming a consulting party and provide your organization's comments on the *adverse effect* finding and Draft MOA. FAA and the City will schedule a meeting with all consulting parties upon completion of the 30-day review period. Please contact me at the San Francisco Airports District Office by phone at (925) 546-6434 or by e-mail at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov).

Sincerely,

A handwritten signature in black ink that reads "Nani Jacobson". The signature is written in a cursive, flowing style.

Nani M. Jacobson  
Environmental Protection Specialist

Enclosures:

Attachment 1: Section 106 Consultation Documentation to SHPO, August 19, 2024  
Attachment 2: Section 106 Consultation Documentation to FAA, September 10, 2024  
Attachment 3: Section 106 Consultation Documentation to SHPO, September 13, 2024  
Attachment 4: Section 106 Consultation Documentation from SHPO, October 24, 2024  
Attachment 5: Draft Memorandum of Agreement

Cc:

Francisco Partida, Fresno Yosemite International Airport  
Karin Boulter, RS&H



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
San Francisco Airports Division Office

Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

December 5, 2024

Fresno County Historical Society  
President Elizabeth Laval  
7160 West Kearney Blvd.  
Fresno, CA 93706

Via Email at: [elaval@valleyhistory.org](mailto:elaval@valleyhistory.org)

Re: Invitation to Section 106 Consultation for the Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Replacement Project, Fresno, California

Dear President Laval:

The Federal Aviation Administration (FAA) is in the process of consulting under Section 106 of the National Historic Preservation Act (NHPA) regarding the Proposed Airport Traffic Control Tower (ATCT) Replacement Project at Fresno Yosemite International Airport (FAT) (Proposed Project). The Proposed Project would address numerous operational, safety and security issues with the existing ATCT, as detailed in the August 19, 2024, letter from the FAA to the California State Historic Preservation Officer (SHPO) initiating Section 106 consultation (see Attachment 1). The Proposed Project includes construction of a new ATCT approximately 250 feet south of the existing ATCT and demolition of the existing ATCT (see Attachment 1, Exhibit 3).

The demolition of the existing ATCT is an “undertaking” subject to Section 106 and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.4, FAA determined the existing ATCT is eligible for listing on the National Register of Historic Places (NRHP) under Criterion C, Architecture, and demolition of the structure would adversely affect the building from being eligible for listing on the NHRP (see Attachment 3). In a letter dated October 24, 2024, SHPO concurred with FAA’s eligibility determination for the ATCT and *adverse effect* to the historic property (see Attachment 4).

In compliance with Section 106 requirements, potential measures to avoid, minimize, or mitigate adverse effects to the existing ATCT were considered. Alternatives to demolition of the existing ATCT were evaluated and dismissed due to factors including safety, feasibility, and ongoing maintenance requirements and associated costs. Therefore, FAA, in coordination with the City of Fresno (City), developed a Draft Memorandum of Agreement (MOA) to identify minimization and mitigation measures. The MOA is a legally binding document that outlines the minimization and mitigation stipulations for the demolition of the existing ATCT.

FAA and the City identified you as potentially having an interest in the undertaking. Pursuant to 36 CFR § 800.2(c) and § 800.3(f), the FAA is inviting you to participate in the Section 106 consultation process as a consulting party. As a consulting party, your organization has the opportunity to provide input to the FAA regarding the historic property. The FAA is seeking your input on the *adverse effect* finding for the ATCT. Attachment 3 provides a summary of the *adverse effect* finding and the full Cultural Resources Assessment. Additionally, FAA is providing the Draft MOA to your organization for input prior to submittal to SHPO and the public for review and comment (see Attachment 5). A proposed mitigation measure described under Stipulation IV of the Draft MOA would design and install an exhibit at a Historical Society building and requires coordination with your organization. Therefore, you are also requested to become a signatory to the MOA pursuant to 36 CFR § 800.6(c)(ii). Should you determine your organization does not want to be a consulting party, FAA will continue to coordinate with you during the planning phase of the Proposed Project to further develop and finalize the proposed exhibit identified under Stipulation IV.



2600 Fresno Street, Third Floor, Room 3065  
Fresno, California 93721-3604  
(559) 621-8003

**Jennifer K. Clark, AICP**  
Director

January 6, 2025

Nani M. Jacobson, M.Sc.  
Environmental Protection Specialist, SFO-ADO  
Federal Aviation Administration, Western Pacific Region  
2999 Oak Rd, Suite 200  
Walnut Creek, CA 94597

Re: Tower Replacement Section 106 Consultation, Adverse Effect Determination and  
Draft MOA

Dear Ms. Jacobson:

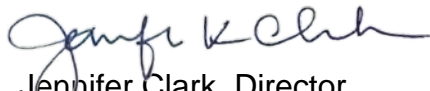
The City of Fresno is in receipt of the Section 106 consultation request regarding the proposed Air Traffic Control Tower (ATCT) Replacement Project (Proposed Project) at Fresno Yosemite International Airport, Fresno County, CA (FAT) that was addressed to the City of Fresno's Historic Preservation Commission (HPC).

Please be advised that the HPC consists of members of the public appointed by the City of Fresno, not professional staff. The HPC reviews projects in a quasi-judicial capacity, while decisions are ultimately made by the Fresno City Council. A letter of response from HPC Chair James Sponsler is attached.

Going forward, please address all correspondence regarding Section 106 consultation on this project to City of Fresno Planning & Development Department staff. In addition, the City of Fresno Planning & Development Department requests to be a consulting party.

If you have further questions regarding this matter, please contact me at (559) 621-8003 or [jennifer.clark@fresno.gov](mailto:jennifer.clark@fresno.gov), or Assistant Director Ashley Atkinson at (559) 621-8492 or [ashley.atkinson@fresno.gov](mailto:ashley.atkinson@fresno.gov).

Sincerely,

  
Jennifer Clark, Director  
Planning and Development  
[Jennifer.Clark@fresno.gov](mailto:Jennifer.Clark@fresno.gov)

Attachment: December 13, 2024 Letter from James Sponsler, Chair, Historic Preservation Commission

cc: Francisco Partida – Fresno Yosemite International Airport  
Karin Bouler – RS&H

December 13, 2024

Nani M. Jacobson  
Environmental Protection Specialist  
San Francisco Airports District Office  
Federal Aviation Administration  
2999 Oak Road, Suite 200  
Walnut Creek, CA 94597

**Re: Section 106 Consultation for the Fresno Yosemite International Airport (FAT)  
Airport Traffic Control Tower Replacement Project**

Dear Ms. Jacobson,

On behalf of the Historic Preservation Commission, we thank you for the opportunity to provide feedback regarding the proposed demolition of the historic Airport Traffic Control Tower (ATCT) at Fresno Yosemite International Airport (FAT). We appreciate the detailed information provided in your December 5, 2024 letter and accompanying documentation. After review, we submit the following comments and concerns regarding the findings of adverse effects and the Draft Memorandum of Agreement (MOA).

**Broader Historical Context and Civic Contributions**

We urge the FAA to include in the MOA a detailed acknowledgment of the historical and civic context in which the existing ATCT was constructed. Specifically:

- **Role of Mayor Arthur Selland:** As mayor during Fresno's transformative period, Arthur Selland's leadership in fostering economic growth, civic improvement, and infrastructure modernization should be highlighted. His administration set the stage for projects like the overall modernization of the city including the Fulton Mall, and Fresno Convention Center. The ATCT, which was designed by Allen Y. Lew to symbolize Fresno's embrace of mid-century modernism and its aspirations as a regional hub is a part of this role and is significant in its own right and in the broader fabric of the period.
- **Legacy of Allen Y. Lew:** The ATCT is a prominent example of the work of Allen Y. Lew, a master architect whose designs were instrumental in shaping Fresno's architectural landscape. Lew was recognized for his innovative and modernist approach, blending functional efficiency with aesthetic simplicity. His work

extended beyond Fresno, gaining national attention for his adherence to International style principles and contributions to civic architecture. Highlighting Lew's legacy as part of the mitigation measures would underscore the ATCT's significance not only as a functional structure but also as a landmark of mid-century architectural excellence.

### **Mitigation Measures and Public Awareness**

While we commend the Draft MOA's inclusion of Historic American Building Survey (HABS) documentation, interpretive signage, and exhibits, we recommend strengthening these measures by:

- **Community Engagement:** Ensuring broader community input during the development of interpretive signage and exhibits to reflect diverse perspectives.
- **Educational Outreach:** Partnering with local organizations like schools and historical societies to incorporate the ATCT's legacy into educational programs.
- **Architectural Legacy of Allen Y. Lew:** Including interpretive materials that emphasize Lew's broader body of work, such as the Fresno Municipal Auditorium and other significant designs, to educate the public on his role in elevating Fresno's architectural identity.

### **Concerns About Demolition Alternatives**

The report indicates that alternatives to demolition were evaluated and dismissed due to concerns about safety, feasibility, and cost. However, it is unclear whether adaptive reuse or alternative site configurations were sufficiently explored. We request additional details on:

- The specific safety and feasibility challenges that precluded alternative preservation approaches.
- The costs associated with retrofitting the current ATCT to meet modern standards compared to its demolition and replacement.

### **Commitment to Legacy Preservation**

The relocation of the new High-Efficiency Control Tower (HECT) to a different site underscores the importance of retaining the legacy of the original ATCT. We recommend including a clause in the MOA committing to the preservation of archival materials, photographs, up to and including acquisition if necessary, and any salvaged architectural elements for public display. This preservation will be able to tell the story of the significance of the ATCT to the broader growth of Fresno, the legacy of Allen Y. Lew, the legacy of Arthur Selland, and aviation history in Fresno.



## **Inadvertent Discoveries and Native American Consultation**

We support the FAA's approach to addressing inadvertent discoveries during construction. However, we encourage ongoing engagement with Native American tribes to ensure any unrecorded cultural resources are respectfully addressed.

The Fresno ATCT represents more than an architectural landmark; it embodies a critical period in Fresno's development as a modern urban center. While we recognize the necessity of modernizing the airport's infrastructure, we believe the mitigation measures must adequately honor and preserve the ATCT's historical and cultural significance. We look forward to discussing these recommendations further at the proposed consulting parties' meeting.

Please do not hesitate to contact us with any questions or for clarification of the above points.

Sincerely,



James Sponsler

Chair, Historic Preservation Commission

City of Fresno

Email: [jwsponsler@sbcglobal.net](mailto:jwsponsler@sbcglobal.net)

Phone: 559-355-1549

cc:

Francisco Partida, Fresno Yosemite International Airport

Karin Bouler, RS&H

The Proposed Project and its associated activities are also subject to the National Environmental Policy Act (NEPA). The FAA is preparing an Environmental Assessment (EA) to evaluate potential impacts on the human environment from the Proposed Project. The FAA will notify you when the Draft EA is issued for public and agency comment. Pursuant to 36 CFR § 800.8, the FAA intends to complete Section 106 in conjunction with the NEPA process.

Your timely response within 30 days of receipt of this correspondence will greatly assist us in completing the Section 106 and NEPA processes. In your response, please include your organization's response to becoming a consulting party and provide your organization's comments on the *adverse effect* finding and Draft MOA. FAA and the City will schedule a meeting with all consulting parties upon completion of the 30-day review period. Please contact me at the San Francisco Airports District Office by phone at (925) 546-6434 or by e-mail at [Nani.M.Jacobson@faa.gov](mailto:Nani.M.Jacobson@faa.gov).

Sincerely,



Nani M. Jacobson  
Environmental Protection Specialist

Enclosures:

Attachment 1: Section 106 Consultation Documentation to SHPO, August 19, 2024  
Attachment 2: Section 106 Consultation Documentation to FAA, September 10, 2024  
Attachment 3: Section 106 Consultation Documentation to SHPO, September 13, 2024  
Attachment 4: Section 106 Consultation Documentation from SHPO, October 24, 2024  
Attachment 5: Draft Memorandum of Agreement

Cc:

Francisco Partida, Fresno Yosemite International Airport  
Karin Boulter, RS&H

## MEETING AGENDA: Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Replacement Section 106 Consulting Parties

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**Project:** FAT ATCT Replacement

**Meeting Date & Time:** January 31, 2025; 11 a.m. PST

**Meeting Place:** Microsoft Teams

**Participants:** Nani Jacobson, FAA; Francisco Partida, FAT; Tristan Tozer, SHPO; Jennifer Clark, City of Fresno / Historic Preservation Commission; Ashley Atkinson, City of / Historic Preservation Commission; Elizabeth Laval, Fresno County Historical Society; Karin Bouler, RS&H; Byron Chavez, RS&H; Dave Full, RS&H; Bart Gover, RS&H; Casey Tibbet, LSA Associates

**Subject:** FAT ATCT Section 106 Consultation

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1. **Welcome and Introductions**
2. **Project Overview**
3. **Section 106 Consultation / Memorandum of Agreement**
4. **Review of the Memorandum of Agreement**
5. **Proposed Mitigation**
6. **Project Milestones**
7. **Action Items**



## MEETING AGENDA: Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Replacement Section 106 Consulting Parties

---

**Project:** FAT ATCT Replacement

**Meeting Date & Time:** January 31, 2025; 11 a.m. PST

**Meeting Place:** Microsoft Teams

**Participants:** Nani Jacobson, FAA; Francisco Partida, FAT; Tristan Tozer, SHPO; Jennifer Clark, City of Fresno / Historic Preservation Commission; Ashley Atkinson, City of / Historic Preservation Commission; ~~Elizabeth Laval, Fresno County Historical Society~~; Karin Boulter, RS&H; Byron Chavez, RS&H; Dave Full, RS&H; Bart Gover, RS&H; Casey Tibbet, LSA Associates

**Subject:** FAT ATCT Section 106 Consultation

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### 1. Welcome and Introductions

- Participants introduced themselves (see above identified participants)
  - Elizabeth Laval, Fresno County Historical Society (FCHS), was unexpectedly unable to attend
- The meeting agenda was briefly reviewed (reference Attachment 1 for the PowerPoint slides)

### 2. Project Overview

- An overview of the Proposed Project was provided.
  - The Proposed Project would replace the existing ATCT facility and associated infrastructure.
  - The existing ATCT needs replacement because it:
    1. Does not meet current standards,
    2. Is not of adequate height and does not provide unobstructed line of sight,
    3. Results in operational inefficiencies,
    4. Has escalating maintenance costs,
    5. Has security deficiencies, and
    6. Is consistent with approved Airport plans to replace.
- Summaries of the Area of Potential Effects (APE), National Register of Historic Places (NRHP) eligibility determinations, and finding of adverse effect were provided.
  - The cultural report was completed in September 2024 and included a record search and architectural field survey.

- The existing ATCT is eligible for the NRHP under Criterion C because it is a highly intact representative of the International style of architecture and because of the architect who designed it, Allen Lew.
- The two buildings adjacent to the existing ATCT, an Airport maintenance building and the aircraft rescue and fire fighting (ARFF) facility, were determined to not be eligible for the NRHP.
- The effect determination was that the Proposed Project would have an adverse effect.

### **3. Section 106 Consultation / Memorandum of Agreement**

- Under Section 106, a Memorandum of Agreement (MOA) has been drafted.
- The MOA is legally binding and serves to:
  - Identify specific mitigation measures to address an adverse effect,
  - Identify responsible party or parties for each mitigation measure, and
  - Document compliance with Section 106.
- The roles of each of the parties were identified as:
  - FAA is the federal lead agency and a signatory of the MOA.
  - The California State Historic Preservation Officer (SHPO) is the Section 106 reviewing and approval agency, and is also a signatory of the MOA.
  - The City of Fresno, FAT, is the project sponsor and a signatory of the MOA.
  - The City of Fresno Department of Planning and Development and Historic Preservation Commission (HPC) is a consulting party.
  - The FCHS is a consulting party and a signatory to the MOA because of their involvement with one of the proposed mitigation measures.
  - The RS&H Team is leading the analysis and document preparation.

### **4. Review of the Memorandum of Agreement**

- The City of Fresno Planning and Development Department in coordination with the City HPC provided input on the Draft MOA, which were reviewed. Responses to the comments were also addressed. See attached slides (Attachment 1) for the full list of comments and responses.
- No comments have been received to date from the FCHS.
  - The attendees agreed that feedback received during past conversations between the project team and Ms. Laval will be included as part of the Section 106 consultation. See Attachment 2 to these meeting minutes for a summary of this feedback.
- Revisions to the Draft MOP based on the input received were summarized and included the following:

- Language was added to the interpretive signage mitigation measure that says that salvaged architectural elements of the existing ATCT would be included, if feasible.
  - Additional language stating that educational materials collected during exhibit development would be submitted to the FCHS was added to the mitigation measure that includes an exhibit with the FCHS.
  - Language specific to Native American resources was added to the inadvertent discoveries stipulation.
- Confirmation was provided to SHPO that the input and responses had been shared with FAA.
- SHPO expressed uncertainty about the feasibility of salvaging elements of the ATCT considering possible presence of hazardous materials.
  - Confirmation was provided that “if feasible” is included in the measure language.

## 5. Proposed Mitigation

- Mitigation measures were reviewed based on the prior addressed revisions.
- SHPO commented that a variety of mitigation measures, as is proposed, are preferred and seem reasonable.
- The City of Fresno agreed with SHPO that the mitigation measures proposed are complementary of each other and reasonable.

## 6. Project Milestones

- Completed, in progress, and anticipated project milestones were reviewed.
- Draft MOA
  - The Draft MOA was submitted to SHPO for review on January 10, 2025.
  - SHPO advised that review of the Draft MOA will not be completed by February 10, 2025. SHPO suggested that the end of February is when they expect to have their review of the Draft MOA completed. SHPO does not anticipate any substantive comments, mostly editorial language and to flush out the annual reporting section.
  - A discussion as to which parties are signatories and which are *invited* signatories was had. SHPO advised keeping only the FAA and SHPO as signatories for MOA and moving the City of an invited signatory with FCHS.
    - Agreement between all parties was made to move the City to an invited signatory in the MOA.
  - FAA asked SHPO if they can have the public review period on the Draft EA begin without SHPO review completed. SHPO indicated that the Draft MOA would then need to go through a separate 30-day public review period.



## **7. Action Items**

- Draft MOA still under review with SHPO, expected completion by Friday, February 28, 2025.
- The City will be changed to an invited signatory in the MOA.

January 31, 2025

# Fresno Yosemite International Airport (FAT) Airport Traffic Control Tower (ATCT) Relocation

Section 106 Consultation





# Agenda

1. Welcome and Introductions
2. Project Overview
3. Section 106 Consultation / Memorandum of Agreement
4. Review of the Memorandum of Agreement
5. Proposed Mitigation
6. Project Milestones
7. Action Items





# Welcome and Introductions

- Federal Aviation Administration (FAA)
- Fresno Yosemite International Airport (FAT) / City of Fresno
- California State Historic Preservation Officer (SHPO)
- City of Fresno, Planning and Development / Historic Preservation Commission
- Fresno County Historical Society
- RS&H California, Inc. (RS&H)
- LSA Associates, Inc. (LSA)

# Project Overview

- The Proposed Project is for the replacement of the existing ATCT facility and associated infrastructure at the Airport.
- Key Reasons why the existing ATCT needs to be replaced:
  1. Existing ATCT Does Not Meet Current Standards
  2. Inadequate Height and Obstructed Line of Sight
  3. Operation Deficiencies
  4. Escalating Maintenance Costs
  5. Security Deficiencies
  6. Consistency with Approved Plan



# APE, National Register Eligibility Determinations, Findings



- Cultural Resources Report, prepared by LSA, completed in September 2024
  - Record search completed by staff at the Southern San Joaquin Valley Information Center (SSJVIC)
    - No records of any archaeological or historic architectural resources within the APE or within 0.5 mile of the APE
  - Architectural Field Survey
    - Existing ATCT
    - The Airport Maintenance Building
    - Aircraft Rescue and Fire Fighting (ARFF) Facility
  - Existing ATCT
    - Eligible for listing in the National Register of Historic Places (NRHP) under Criterion C
    - Highly intact representative of the International style of architecture as applied to an ATCT
    - Work of master architect Allen Y. Lew, FAIA
  - Airport Maintenance Building and ARFF Facility
    - Not representative of any architectural style or characteristics
    - Not eligible for listing in the NRHP
  - Pursuant to Section 106 of the NHPA (36 CFR Part 800.5), the proposed demolition of the ATCT will **adversely affect** the building from being eligible for listing on the NRHP under 36 CFR Part 800.5(a)(1).



# Section 106 Consultation – Memorandum of Agreement



## – Memorandum of Agreement (MOA)

- The MOA is a legally binding document that serves three purposes:
  1. Identifies specific mitigation measures to address an adverse effect
  2. Identifies the responsible party or parties for each mitigation measure
  3. Documents compliance with Section 106

## – Roles

- FAA = federal lead agency, MOA signatory
- SHPO = Section 106 review and approval agency, MOA signatory
- FAT/City of Fresno = project sponsor, MOA signatory
- City of Fresno Department of Planning and Development / Historic Preservation Commission = consulting party, review of MOA
- Fresno County Historical Society = consulting party, mitigation development (exhibit and educational material) MOA signatory
- RS&H Team = document preparation and analysis

# Review of Draft Memorandum of Agreement – City / Historic Preservation Commission Comments



Comment	Response
Broader Historical Context and Civic Contributions: Include detailed acknowledgement of the historical and civic context in which the ATCT was constructed, including role of Mayor Arthur Selland and legacy of Allen Y. Lew.	The historical context on the ATCT and information on the legacy of Allen Y. Lew is included in the Cultural Resources Assessment to the extent that it is relevant to the Proposed Project and ATCT at FAT. Similarly, relevant information will be included in the exhibits and materials developed as mitigation.
Mitigation Measures and Public Awareness: Expansion of the stipulations to include community engagement, educational outreach, and an expansion of details on Allen Y. Lew’s broader body of work in Fresno	Community engagement is included during the public review process for both the NEPA EA and the CEQA EIR, giving the public two opportunities for comment and input. Educational outreach has been incorporated through the development of exhibits at both the Airport terminal and with the Fresno County Historical Society (FCHS). Language was added to the MOA to clarify and to include submittal of the electronic materials created during mitigation development to the FCHS and on the City website. See prior comment response for discussion on expanding the details of Allen Y. Lew.

# Review of Draft Memorandum of Agreement – City / Historic Preservation Commission Comments (continued)



Comment	Response
Concerns about Demolition Alternatives: Additional detail on the alternatives analysis.	The Draft EA will provide a chapter that details the alternatives analysis.
Commitment to Legacy Preservation: Include clause committing to the preservation of archival materials, photographs, up to and including acquisition if necessary, and any salvaged architectural elements for public display	The MOA was revised to include that the interpretive signage would include salvaged architectural elements of the existing ATCT, if feasible.
Ongoing engagement with Native American tribes	Native American tribes have been contacted twice: 1) during the Section 106 process (FAA lead), and 2) during the State Assembly Bill 52 process (City lead). Consultation was declined both times. Additional inadvertent discovery language has been added specific for the tribes: <i>In the case of prehistoric or historic Native American sites, the FAA shall notify appropriate state and federally recognized tribal leaders.</i>



# Review of Draft Memorandum of Agreement – Fresno County Historical Society Comments



Comment	Response
To come	

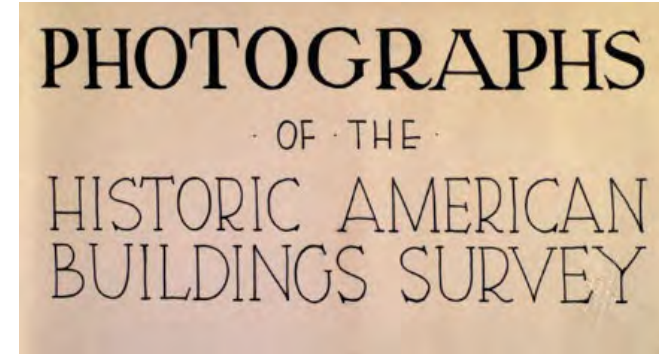
# Revisions to Draft Memorandum of Agreement



- Interpretive Signage
  - Added that the signage would include, if feasible, salvaged architectural elements of the existing ATCT
- Exhibit and Educational Materials with FCHS
  - Added that the City will provide any educational materials collected during the exhibit development process to FCHS electronically for FCHS to incorporate the ATCT's legacy into any educational programs they provide
- Inadvertent Discoveries
  - Added language specific to Native American inadvertent discoveries
- [potential for more to come after FCHS feedback]

# Proposed Mitigation

- Coordination on mitigation with SHPO, City of Fresno / Historic Preservation Commission, and Fresno County Historical Society
- Develop Memorandum of Agreement (MOA) through continued consultation with SHPO
- MOA will include mitigation measures to address the adverse effect to the existing ATCT:
  - Measure 1: Historic American Building Survey (HABS), Level II
  - Measure 2: Interpretive sign and plaque commemorative of the existing ATCT in the FAT terminal
  - Measure 3: Include an exhibit with the permanent Chinese artifacts exhibit that the Fresno County Historical Society (FCHS) is developing. Location is at building newly purchased by FCHS for the Chinese artifacts exhibit.
  - Measure 4: FAT website materials
- Open Discussion





# Project Milestones – Completed



- May 10, 2024 – listing of Native American contacts received from the California Native American Heritage Commission [Tribal Consultation/Section 106]
- July 1, 2024 – consultation initiated with 11 tribes [Tribal Consultation/Section 106]
  - One response received from Chairperson Valentin Lopez of the Amah Mutsun Tribal Band stating the proposed project is outside of the tribe's traditional territory and they have no comments.
  - No other comments received.
- July 8, 2024 – Initiated preparation of Draft Environmental Assessment (EA) [National Environmental Policy Act (NEPA)]
- August 19, 2024 – APE submitted to SHPO for concurrence [Section 106]
- September 10, 2024 – SHPO concurred with APE [Section 106]
- September 13, 2024 – Request for concurrence with determination of eligibility and finding of effect submitted to SHPO [Section 106]
- October 24, 2024 – SHPO concurred with determination of eligibility and finding of effect [Section 106]

## Project Milestones – Completed, In Progress, or Anticipated



- November 18, 2024 – Section 106 and Section 4(f) meeting with SHPO [Section 106]
- December 5, 2024 – Submitted draft Memorandum of Agreement (MOA) to consulting parties for input [Section 106]
- January 10, 2025 – Submitted revised draft MOA for California State Historic Preservation Officer (SHPO) review [Section 106]
- January 31, 2025 – Consulting parties meeting [Section 106]
- February 10, 2025 – Anticipated SHPO review of Draft MOA completed [Section 106]
- March 2025 – Anticipated release of Draft EA with Section 4(f) Evaluation and Draft MOA. Includes public comment period (45 days) [NEPA]
- June 2025 – Anticipated Final EA / Finding of No Significant Impacts (FONSI) [NEPA]
- July 2025 – Anticipated NEPA Decision Document issued

## Q&A and Action Items





# Thank you

Nani Jacobson, M. Sc.  
Environmental Protection Specialist  
Federal Aviation Administration – SFO-ADO  
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Francisco Partida  
Assistant Director of Aviation  
City of Fresno / Fresno Yosemite International Airport  
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**Attachment 2 – Correspondence with FCHS**

- On Wednesday, October 23, 2024, project architectural historian Casey Tibbet spoke with Ms. Laval in her role as president of the FCHS to discuss the potential mitigation measure for inclusion in the MOA that would provide an exhibit of the history of the existing ATCT with the FCHS. Ms. Laval was eager to collaborate on the exhibit and discussed incorporating it into the FCHS's existing Chinese artifact exhibit. Ms. Laval mentioned that FCHS had purchased a building for their archive and the Chinese artifact exhibit will be moving to that location permanent, so it is a good idea to expand the exhibit to include Allen Lew. Based on this conversation, a mitigation measure has been identified and is included in the MOA to develop an exhibit with the permanent Chinese artifacts exhibit that FCHS is developing.

Additional feedback on the Proposed Project was also provided by Ms. Laval, who stated that she was opposed to the demolition because the ATCT is eligible for the NRHP, so alternatives to retain the tower should be evaluated, but was happy to have been contacted about participating in the mitigation process. Ms. Laval said that it would be nice to salvage some of the existing ATCT to include in the exhibit at FCHS, if the ATCT was to be demolished. This comment was also made by the City/HPC and has been incorporated into the MOA to say that salvaged architectural elements will be included in the exhibits, if feasible.

- On Friday, January 17, 2025, Karin Bouler (RS&H) of the City's consultant team contacted Ms. Laval to confirm FCHS's interest in participating in the Section 106 process to develop the mitigation measure at the FCHS facility. This contact was conducted after the requested review period for the Draft MOA had ended (input was requested by January 6, 2025). Ms. Laval confirmed her interest in participating in the Section 106 process, including working with FAA and the City to develop the mitigation measure with FCHS. Ms. Laval also reiterated her appreciation to have been contacted for input even after the requested review period had ended.