APPENDIX E
SECTION 4(F) EVALUATION

APPENDIX E: DRAFT SECTION 4(F) EVALUATION FRESNO YOSEMITE INTERNATIONAL AIRPORT

AIRPORT TRAFFIC CONTROL TOWER (ATCT) REPLACEMENT

U.S. Department of Transportation
Federal Aviation Administration

Draft Section 4(f) Evaluation for the Airport Traffic Control Tower (ATCT) Fresno Yosemite International Airport Fresno, California

May 2025

This Department of Transportation Section 4(f) Evaluation is submitted for review pursuant to the following public law requirements: Section 102(2)(c) of the National Environmental Policy Act of 1969; Section 303 of 49 USC Code, Subtitle I; Section 106 of the National Historic Preservation Act of 1966.

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1 INTRODUCTION

The City of Fresno (City) is proposing to implement the construction and operation of a replacement Airport Traffic Control Tower (ATCT) (Proposed Project) at the Fresno Yosemite International Airport (FAT or Airport). The preferred alternative would construct a new ATCT and demolish the existing ATCT facility once the new ATCT facility is fully operational. This Draft Section 4(f) Evaluation describes the regulatory framework and methodology for this Section 4(f) evaluation, the purpose and need for the Proposed Project, the description of the Proposed Project, how the Proposed Project would use Section 4(f) protected properties, alternatives to avoid the use of Section 4(f) properties, coordination between FAA and the Section 4(f) official with jurisdiction (OWJ), and the preliminary determination of Section 4(f) use.

1.1 Regulatory Framework and Methodology

Section 4(f) of the U.S. Department of Transportation (U.S. DOT) Act of 1966, 49 United States Code (USC) 303(c) is a federal law that protects significant publicly owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites. Section 4(f) requirements apply to all transportation projects that require funding or other approvals by the U.S. DOT. The Federal Aviation Administration's (FAA) guidance for Section 4(f) is found in FAA Order 1050.1F, Appendix B. The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) issued Section 4(f) implementing regulations in 23 CFR Part 774 that are not binding to the FAA. However, the FAA may use them as guidance to the extent relevant to aviation. FAA Order 1050.1F, Appendix B states that "the Secretary of Transportation may approve a transportation program or project that requires the use of any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or land from any publicly or privately owned historic site of national, state, or local significance, only if there is no feasible and prudent alternative to the use of such land and the program or project includes all possible planning to minimize harm resulting from the use."

The primary steps of a Section 4(f) evaluation are as follows:

1. Identify any Section 4(f) properties within or near the project study area.
2. Determine if the project would "use" the Section 4(f) resource.
3. Analyze avoidance alternatives to determine if a feasible and prudent alternative that would avoid the use of the Section 4(f) property exists.
4. Consider all possible planning to minimize harm, including design adjustments and mitigation, if no feasible and prudent avoidance alternative exists.
5. Determine which alternative(s) causes the least overall harm to the Section 4(f) property.
6. Coordinate with the Official(s) with Jurisdiction (OWJ) over the Section 4(f) property and document all coordination efforts.

FAA will make its final Section 4(f) determination in the Final Environmental Assessment (EA) for the project, and subsequent to its consideration of public and agency comments.

1.1.1 Definitions

The following definitions are described under FAA Order 1050.1F, Appendix B, and are based on 23 CFR Part 774.

1.1.1.1 Types of Section 4(f) Properties

Resources protected under Section 4(f) include publicly owned and accessible parks and recreational areas of national, state, or local significance; publicly owned wildlife or waterfowl refuges of national, state, or local significance; and historic sites of national, state, or local significance that are publicly or privately owned.

1.1.1.2 Use of Section 4(f) Property

In the context of Section 4(f) analyses, the term "Use" includes physical or constructive use of Section 4(f) property, as described below.

Physical Use of Section 4(f) Property

A physical use would involve an actual 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.

A temporary occupancy applies to construction-related activities and is so minimal that it does not constitute a use within the meaning of Section 4(f). However, a temporary occupancy would be considered a use if:

- The duration of the occupancy of the Section 4(f) property is greater than the time needed to build a project and there is a change in ownership of the land;
- The nature and magnitude of changes to the 4(f) property are more than minimal;
- Anticipated permanent adverse physical impacts would occur and a temporary or permanent interference with Section 4(f) activities or purposes would occur;
- The land use is not fully returned to existing condition; or
- There is no documented agreement with appropriate agencies having jurisdiction over the Section 4(f) property.

Constructive Use of Section 4(f) Property

Constructive use occurs when the impacts of a project do not physically use land that is a Section 4(f) property; however, the effects from a project on the Section 4(f) property are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features, or attributes of the Section 4(f) property that contribute to its significance or enjoyment are substantially diminished. This means that the value of the Section 4(f) property, in terms of its prior significance and enjoyment, is substantially reduced or lost.

De Minimis Impact

The FAA may determine physical occupation to be *de minimis* if it does not adversely affect the activities, features, or attributes that qualify the park, recreation area, or wildlife or waterfowl refuge for protection under Section 4(f). The FAA may also determine occupation of historic

properties for which a determination of no adverse effect under Section 106 of the National Historic Preservation Act of 1966 has been rendered to be *de minimis*.

1.1.1.3 Feasible and Prudent

An alternative is feasible and prudent if it avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweigh the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the property (i.e., some Section 4(f) properties are worthy of a greater degree of protection than others).

A potential alternative is not feasible if it cannot be built as a matter of sound engineering judgment. An alternative is not prudent if:

1. It compromises the project to a degree that it is unreasonable to proceed in light of the project's stated purpose and need (i.e., the alternative doesn't address the purpose and need of the project);
2. It results in unacceptable safety or operational problems;
3. After reasonable mitigation, it still causes severe social, economic, or environmental impacts; severe disruption to established communities; severe or disproportionate impacts to minority or low-income populations; or severe impacts to environmental resources protected under other Federal statutes;
4. It results in additional construction, maintenance, or operational costs of extraordinary magnitude;
5. It causes other unique problems or unusual factors; or
6. It involves multiple factors as outlined above that, while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

1.1.1.4 All Possible Planning

All possible planning means that all reasonable measures identified in the Section 4(f) evaluation to minimize harm or mitigate adverse effects must be included in the project.

In evaluating the reasonability of measures to minimize harm, FAA Order 1050.1B, Appendix B.2, provides the following guidance.

> "… the responsible FAA official will consider the preservation purpose of the statute, the views of officials having jurisdiction over the Section 4(f) property, whether the cost of measures is a reasonable public expenditure in view of the adverse impacts on the Section 4(f) property and the benefits of the measures to the property, and impacts or benefits of the measures to communities or environmental resources outside the Section 4(f) property."

1.1.1.5 Least Overall Harm

If there is no feasible and prudent avoidance alternative to the use of Section 4(f) property then FAA may approve only the alternative that causes the least overall harm in light of the statute's preservation purpose. The least overall harm is determined by balancing the following seven factors:

1. The ability to mitigate adverse effects to each Section 4(f) property (including any measures that result in benefits to the property):
2. The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
3. The relative significance of each Section 4(f) property;
4. The views of the official(s) with jurisdiction over each Section 4(f) property;
5. The degree to which each alternative meets the purpose and need for the project;
6. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
7. Substantial differences in costs among the alternatives.

1.1.1.6 Section 6(f) of the Land and Water Conservation Fund Act

The evaluation of Section 4(f) properties includes consideration of impacts to recreational properties acquired using funds provided through the Land and Water Conservation Fund Act (LWCFA) of 1965. Section 6(f) of the LWCFA precludes the conversion of recreational lands purchased or developed with Land and Water Conservation Fund Act funds to non-recreational uses unless the conversion of land is approved by the Secretary of the Department of Interior.

1.2 Applicability to the Proposed Project

Implementation of the Proposed Project would affect one structure determined to be eligible for listing on the NRHP. This Section 4(f) Evaluation documents the evaluation of these impacts. No properties purchased or improved with Section 6(f) funds would be affected by the Proposed Project and Section 6(f) resources are not discussed further in this Section 4(f) Evaluation.

2 PURPOSE AND NEED

The following section discusses the purpose and need for the Proposed Project.

2.1 Need

The ATCT was commissioned in 1961 and has exceeded its useful life. According to U.S. DOT, the average useful life of an ATCT facility is approximately 25 to 30 years (U.S. DOT, 2008). Despite its continued service, 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. These issues pose several safety deficiencies and challenges to the Airport's ongoing maintenance efforts to keep the ATCT operational and safe for air traffic control purposes.

Below are the six 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. Operational inefficiencies;
4. Escalating maintenance costs;

5. Security deficiencies; and
6. Consistency with approved plans

2.2 Purpose

The purpose of the Proposed Project is to provide an ATCT facility that meets current FAA, State and local building standards and improves safety and operations at the Airport for ATCT operators and Airport users.

2.3 FAA Purpose and Need

FAA's purpose and need is to ensure that the Proposed Project does not derogate the safety of aircraft and airport operations at FAT. Moreover, it is the policy of the FAA under 49 U.S.C. § 47101(a)(7) that airport development projects provide for the protection and enhancement of natural resources and the quality of the environment of the United States.

3 DESCRIPTION OF PROPOSED PROJECT

The Proposed Project is the replacement of the existing ATCT facility and associated infrastructure at the Airport. The project study area is the footprint of the Proposed Project and the boundary in which all components and staging areas would be located and, therefore, where a potential for direct effects to occur. All components are located within the project study area. The Proposed Project includes the following components, which are illustrated in **Figure 1**:

- 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.

3.1 Construct New ATCT Facility and Demolish Existing ATCT Facility

The Proposed Project would construct a new ATCT facility 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 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.

The replacement ATCT facility would meet the design policy described in Federal Aviation Administration (FAA) Job Order 6480.7E, *ATCT and TRACON Design Policy*. The base building would include administrative offices and operational and storage spaces. [1] 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; 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.

[1] Operational space is for ATCs to 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.

Figure 1: Proposed Project

Source: RS&H, 2024

Access to the building would remain the same as to the existing ATCT, which is accessible from East Andersen Avenue.

Once the new ATCT is fully operational, the existing ATCT would be demolished and the site would be converted to parking to replace the parking lost because of the construction of the new ATCT.

3.2 Install New Equipment and Utility Services

The Proposed Project would install new equipment in the replacement ATCT including new ATC equipment, such as navigation and management systems, communications equipment, and electrical panels. New utility services would also be connected to the replacement ATCT facility from existing utility systems. Utilities installation to the new ATCT facility would include:

- Electrical connections from the existing electrical network under the apron to the north of the existing ATCT.
- Stormwater pipe connection from the existing stormwater drainage system under East Andersen Avenue.
- Sanitary sewer pipe connection from the existing sewer system under East Andersen Avenue.
- Water pipe connection from the existing water system under North Ashley Avenue, east of the proposed new ATCT location.

FAA duct banks that house various electrical and other conduits would be extended from their existing terminus between the existing ATCT and the Airport maintenance facility to the proposed new ATCT facility.

3.3 Reconstruct Employee Parking Lot and Install Security Fencing

The existing employee parking lot on the existing ATCT site has 48 vehicle parking spaces. The new ATCT facility would overlap with the existing parking lot, therefore the parking lot would be reconstructed in order to provide a minimum of 48 vehicle parking spaces to ensure sufficient employee parking availability.

The existing ATCT site currently only has fencing on the portion of the west side and does not have fencing enclosing the ATCT site, leaving it unsecure. Security fencing is proposed as part of the Proposed Project that would connect to the existing fence and enclose the ATCT facility and the adjacent parking lot. A portion of existing fence that connects to the existing ATCT would be removed and the ATCT would also include gate-controlled access to the parking lot and site.

4 DESCRIPTION OF SECTION 4(F) PROPERTIES

4.1 Publicly owned public parks, recreational areas, wildlife and waterfowl refuges

Based on review of mapping and City, U.S. Fish and Wildlife, and California State Parks websites, no publicly owned parks, recreational areas, or wildlife or waterfowl refuges exist within or near the project study area.

4.2 Public and private historic sites

In accordance with Section 106 of the National Historic Preservation Act, an Area of Potential Effects (APE) was established based on the project components described in **Section 3**.[2] 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 2**). 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. The APE differs from the Project Study Area in that it includes the Airport maintenance building and the ARFF facility due to their proximity to the Proposed Project. These structures would not be affected by the Proposed Project.

A Cultural Resources Assessment for the APE concluded that the existing ATCT is a historic property eligible for listing on the NRHP, thus is subject to Section 4(f).

The existing ATCT at FAT is owned by the City and is leased by the FAA. The ATCT is staffed and operated by FAA personnel. The ATCT is continuously operated 24 hours a day, 7 days a week. The existing ATCT is located on Airport property on a 2.25-acre site northwest of the passenger terminal and adjacent to the ARFF station. Access to the ATCT is not available to the public per FAA safety and security requirements. Access for ATCT personnel is available off of East Anderson Avenue.

The ATCT was commissioned in 1961 and has not undergone any major renovations or remodels, only minor alterations. The ATCT is significant under Criteria 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 Allen Y. Lew, FAIA. The ATCT retains high integrity of location, design, materials, workmanship, feeling, and association. Its period of significance is 1961, when it was first occupied. The ATCT is among five buildings that were designed by Lew at the Airport at that time, including the original terminal building.

5 USE OF SECTION 4(F) PROPERTY

The following provides an overview of the use of the Section 4(f) property associated with the Proposed Project.

5.1 Permanent Physical Use

The demolition of the existing ATCT as part of the Proposed Project would result in the removal of a structure that is eligible for listing on the NRHP. As a result, the demolition of the existing ATCT would constitute a physical use of a Section 4(f) property.

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[2] The APE varies from the project study area to include the two buildings adjacent to the existing ATCT, an Airport maintenance building and the Airport's ARFF facility, in the historic resources evaluation due to their proximity to the existing ATCT. Neither building was determined to be eligible for listing in the NRHP and are not Section 4(f) resources.

Figure 2: Area of Potential Effects

Source: RS&H, 2024

5.2 Temporary Physical Use

The Proposed Project would not result in any temporary physical use of a Section 4(f) property.

5.3 Constructive Use

The Proposed Project would not result in any constructive use of a Section 4(f) property.

5.4 De Minimis Impact

The Proposed Project would not result in a *de minimis* impact to a Section 4(f) property.

6 AVOIDANCE ALTERNATIVES

The Section 4(f) statute requires the selection of an alternative that completely avoids the use of Section 4(f) property if that alternative is deemed feasible and prudent. This section evaluates the avoidance alternatives to the Proposed Project and includes a project description, prudent and feasible avoidance alternative determination, an assessment of all possible planning to minimize harm, and a preliminary least overall harm analysis.

Initial steps to identify locations to evaluate as potential sites for a new ATCT facility began in 2010. In 2010 an ATCT Site Survey Draft Report was initiated that identified and analyzed 17 possible sites on Airport property that could accommodate the required facility size (see **Figure 3**). This analysis provides the background of the avoidance alternatives for this Section 4(f) evaluation. The sites identified in 2010 would avoid the Section 4(f) use of the existing ATCT if they would not require demolition of, or otherwise adversely affect, the existing ATCT. As such, these 17 sites are analyzed under Section 4(f) as avoidance alternatives. The 2010 draft report recommended continuing evaluation for Sites 6, 7B, 12A and 13.

A Siting Report was completed in 2024 for replacement of the ATCT that carried forward the analysis of Sites 6 and 13A, revised Sites 3 and 11 to Site X1, and revised Site 13 to Site X2 from the 2010 draft report.

If the existing ATCT is not demolished, two options are available as to how to treat the existing ATCT. Each avoidance alternative, excluding the alternative to rehabilitate the existing ATCT (Site 2) and the No Action Alternative, include these two options as described below.

- *Option A: Preserve Existing ATCT in Place*
  Option A would preserve the existing ATCT facility as a vacant building in its current location and move existing operations into a new ATCT facility. The ATCT is eligible for listing on the National Register of Historic Places (NRHP); therefore, necessary steps would be taken to ensure the long-term integrity and character-defining elements of the ATCT through repairs, restoration, and continued maintenance. See Section 3.4.5 of the EA for additional information on NRHP eligibility.

  Through the relocation of ATC operations to a new facility, the existing ATCT would not be required to meet the current FAA space and height requirements detailed in FAA Order 6480.7E, *Airport Traffic Control Tower (ATCT) and Terminal Radar Approach Control (TRACON) Design Policy* and FAA Order 6480.4B, *Airport Traffic Control Tower Siting Criteria*. Additionally, because the structure would remain vacant, extensive improvements to the ATCT would not be required to bring the building up to code to

Figure 3: Initial Potential ATCT Sites Identified

Source: City of Fresno, 2010; City of Fresno, 2024; RS&H, 2024

meet current State and local building requirements, such as seismic, fire, and ADA standards due to the potential for the City provide exceptions for historical structures.

Rehabilitation of the existing ATCT structure would be made with the goal of limiting alterations and repairs in an effort to preserve the features that convey its historic values and maintain eligibility on the NRHP. Rehabilitation would follow *The Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (U.S. Department of the Interior, 2017). Preservation would include measures to protect and stabilize the structure while using appropriate materials and techniques to preserve features that contribute to the eligibility of the ATCT as a historic resource, as identified in the Cultural Resources Analysis (Appendix D of the EA). Because limited alterations have been made to the structure since it was constructed and the elements of the original construction remain largely intact, it is assumed that restoration and reconstruction would not be required to revert any features back to its original state.

After necessary repairs are made and restoration is completed, preservation of the existing ATCT would involve ongoing maintenance to prevent deterioration of the aging structure.

- *Option B: Retain Existing ATCT for Another Use at FAT*
  Retaining the existing ATCT for other uses would include all of the preservation, repairs, and rehabilitation identified under Option A. Additionally, because ATC operations would be relocated to a new facility, this option would also not require that the existing ATCT meet the current FAA space and height requirements. However, Option B is different from Option A, because the facility would then be repurposed for a use other than an ATCT and the building would need to be updated to meet current State and local building requirements, such as seismic, fire, and ADA standards. Therefore, this option would require extensive upgrades and repairs that could negatively affect features that contribute to the eligibility of the ATCT as a historic resource.

  Following repairs and restoration of the existing ATCT, the building could be reused for other Airport facilities, such as office space. Because of the location of the existing ATCT on Airport property, adjacent to an active airfield (i.e., an aircraft movement area), the facility could not be converted into a facility that would allow for or require public access. FAA Advisory Circular (AC) 150/5300-13B, Airport Design, states that, "Part 139[3] airports must provide safeguards that prevent unauthorized person entry to the movement area. This includes installation of fencing, provision of access controls, and conformance to the Transportation Security Administration's approved airport security program."

All alternatives discussed in **Sections 6.1 through 6.12** would completely avoid the use of a Section 4(f) property. These sections include an assessment of the feasibility and prudence of

[3] 14 CFR Part 139 requires FAA to issue airport operating certificates to airports that: serve scheduled and unscheduled air carrier aircraft with more than 30 seats; serve scheduled air carrier operations in aircraft with more than 9 seats but less than 31 seats; and the FAA Administrator requires to have a certificate. FAT operates under a Part 139 certificate.

these alternatives. In summary, the preliminary determination is that none of these avoidance alternatives would be feasible and prudent as per the criteria provided in FAA Order 1050.F and 23 CFR 774.17.

Site identifiers are consistent with the sites identified in the 2010 draft report (see **Figure 3**).

6.1 Site 1 with Option A or Option B

6.1.1 Description

Site 1 is located approximately 320 feet northwest of the existing ATCT (see **Figure 3**). Thus, construction at this location would not require the demolition of the existing ATCT. The site has an existing fixed-base operator (FBO) that is under a long-term lease. Because of the long-term lease agreement, use of this site would require condemnation for an ATCT to be constructed.

6.1.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. Although design of an ATCT at this site was not developed, it is assumed that this alternative would be feasible to construct.

6.1.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Site 1 would result in an ATCT that meets the following Proposed Project needs:

   1. Meets current FAA, State, and local building standards, even though the existing facility would continue to not meet this need;

   3. Allows for operational efficiency; and

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   2. Provides inadequate height and obstructed lines of sight because the existing ATCT, if not demolished, would likely impede views of the ends of Runways 29R and 29L due to the required limitations on how far into the airfield the new ATCT could be constructed without encroaching on the building restriction line of the airfield. The building restriction line is an FAA-required boundary that denotes the suitable building area at an airport based on airfield safety standards. The building restriction line encompasses the runway protection zones, the runway object free area, the runway visibility zone, navigational aid (NAVAID) critical areas, areas required for terminal instrument procedures, and ATCT clear line of sight;

   4. Results in high costs of repairs to the existing facility in order to preserve the integrity of the building; and

   6. Is not consistent with approved Airport plans to demolish the existing ATCT and does not continue to show this as the location of an FBO (City of Fresno, 2019a).

2. Safety or Operational Considerations

As stated above, the FBO site would result in obstructed lines of sight due to the proximity and location of the existing ATCT. This results in potential safety risks, including aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing an ATCT at Site 1.

4. Cost

   Additional costs are associated with Site 1 due to the cost to condemn the current FBO tenant. However, because the FBO site is already developed and utility infrastructure is present, it is unlikely to result in costs of an extraordinary magnitude.

5. Unique Problems or Unusual Factors

   The FAA and the City determined that Site 1 would result in a unique problem because the site is already developed and occupied by an Airport tenant under a long-term lease agreement.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need for the Proposed Project and has the unique problem of being occupied by an existing FBO tenant with a long-term lease. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.1.4 Avoidance Alternative Determination

Site 1 would avoid use of the Section 4(f) property; however, it is deemed not prudent because it would not meet the purpose and need of the Proposed Project, would result in potential safety risks, and would result in a unique problem due to the site being occupied with a long-term lease.

6.2 Site 10 with Option A or Option B

6.2.1 Description

Site 10 is located on the immediate northeast side of the existing ATCT within the airfield (see **Figure 3**). Thus, construction at this location would not require the demolition of the existing ATCT. The site is paved and is used as an aircraft apron and for airside vehicle parking.

6.2.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. An ATCT facility at this site would encroach on the building restriction line of the airfield, which is an FAA-required boundary that denotes the suitable building area at an Airport based on airfield safety standards. Therefore, Site 10 is not feasible to construct.

6.2.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Site 10 would result in an ATCT that meets the following Proposed Project needs:

2. Provides adequate height and unobstructed line of sight;

3. Allows for operational efficiency; and

5. Is secure from unauthorized access.

This alternative would not meet the following Proposed Project needs:

1. Does not provide an ATCT that meets current FAA, State, and local building standards because the new ATCT would be located within the building restriction line of the airfield, which would not meet FAA safety standards;

4. Results in high costs of repairs to the existing facility in order to preserve the integrity of the building; and

6. Is not consistent with approved Airport plans to demolish the existing ATCT and that continue to show this location as an aircraft apron (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, Site 10 would result in the new ATCT being located within the building restriction line of the airfield, which would not meet FAA safety standards.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   Because this site is already developed and utility infrastructure is present, this alternative is unlikely to result in costs of an extraordinary magnitude.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative is not feasible to construct and would not meet the purpose and need for the Proposed Project. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.2.4 Avoidance Alternative Determination

Site 10 would avoid use of the Section 4(f) property; however, it is deemed to not be feasible to construct and is not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks.

6.3 Site 9 with Option A or Option B

6.3.1 Description

Site 9 is located north of the airfield and towards the east end of the Airport, south of East Westover Avenue (see **Figure 3**). Thus, construction at this location would not require the demolition of the existing ATCT. The site is currently vacant and is east of a general aviation (GA) area that includes a helicopter tenant, SkyLife Air Ambulance, and SkyWest Airlines FBO.

6.3.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. Although design of an ATCT at this site was not developed, it is assumed that an ATCT on this site would be feasible to construct.

6.3.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Site 9 would result in an ATCT that meets the following Proposed Project needs:

   1. Meets current FAA, State, and local building standards, even though the existing facility would continue to not meet this need;

   4. Does not result in high costs of repairs and facility disruptions due to continuous maintenance; and

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   2. Provides inadequate height and obstructed lines of sight because it would not be possible to discern between the ends of Runway 11L and Runway 11R due to the angle and distance between an ATCT at this location and the runway ends. ATCTs located on this side of the airfield would also be facing into the sun in the afternoon, resulting in glare;

   3. Due to the inability for Air Traffic Controllers (ATCs) to discern between the ends of Runways 11L and 11R would also result in operational inefficiencies due to delay in relaying information to pilots; and

   6. Is not consistent with approved Airport plans to demolish the existing ATCT and that show this location as a GA development site (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, this alternative would result in obstructed lines of sight due to the site location and distance to the ends of Runway 11L and Runway 11R. This results in potential safety risks, including aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   This site is currently not developed, so the construction of this alternative would potentially involve complex site conditions (grading, excavation, foundation work, utility relocations, etc.). Utilities would have to be extended from the facilities at the FBO site across from East Aircorp Way to reach the northeast side of the Airport site. Therefore, due to the condition of

the site and a longer construction duration to account for the site conditions, this alternative would result in disproportionately higher costs due to construction methods or materials.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need for the Proposed Project and has additional costs associated with construction on an undeveloped site. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.3.4 Avoidance Alternative Determination

Site 9 would avoid use of the Section 4(f) property; however, it is deemed not prudent because it would not meet the purpose and need of the Proposed Project, would result in potential safety risks, and would result in additional costs to construct on an undeveloped site.

6.4 Sites 4, 7, 7A, and 7B with Option A or Option B

6.4.1 Description

Sites 4, 7, 7A, and 7B are located north of the airfield and southwest of East Airways Boulevard (see **Figure 3**). Thus, construction at this location would not require the demolition of the existing ATCT. The site is currently vacant and is south of an existing hangar facility. The floor of the cab would be 94 feet tall; the cab floor to the top of the ATCT would be approximately 20 feet for a total ATCT height of approximately 124 feet

6.4.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. Due to the location of this site, in relation to future Airport development and existing visual obstructions, the height of a tower at this site would encroach into the precision approach protection zone. The precision approach is what guides planes vertically, down to the runway. Therefore, Sites 4, 7, 7A, and 7B are not feasible to construct.

6.4.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Sites 4, 7, 7A, and 7B would result in an ATCT that meets the following Proposed Project need:

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   1. Does not meet current FAA, State, and local building standards because the new ATCT would encroach into the precision approach protection zone, which would not meet FAA safety standards;

   2. Provides inadequate height and obstructed lines of sight because it would have obstructed views of the ends of Runways 29R and 29L because of trees located offsite at the adjacent golf course and the location on the airfield would result in glare issue

from the sun for ATCs. Further, ATCTs located on this side of the airfield would be facing into the sun in the afternoon, resulting in glare;

3. The obstructed lines of sight of the ends of Runways 29R and 29L would also result in operational inefficiencies due to delay in relaying information to pilots;

4. Results in high costs of repairs to the existing facility in order to preserve the integrity of the building; and

6. Is not consistent with approved Airport plans to demolish the existing ATCT and that show this location as future hangar development (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, Sites 4, 7, 7A, and 7B would encroach into the precision approach protection zone and result in obstructed lines of sight due to obstructed lines of sight of the ends of Runways 29R and 29L. This is not consistent with FAA safety standards and results in potential aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   This site is currently not developed; therefore, construction of this alternative would potentially involve complex site conditions (grading, excavation, foundation work, utility relocations, etc.). Utilities would have to be extended from the hangar facility to the northwest of the site or from the animal shelter facilities across East Airways Boulevard. Additionally, the extra height needed for an ATCT at this site would result in additional costs. Therefore, due to the condition of the site, a longer construction duration to account for the site conditions, and the required height of the ATCT, this alternative would result in disproportionately higher costs due to construction methods or materials.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative is not feasible to construct, would not meet the purpose and need, and has additional costs associated with construction on an undeveloped site and from the height of the ATCT. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.4.4 Avoidance Alternative Determination

Sites 4, 7, 7A, and 7B would avoid use of the Section 4(f) property; however, they are deemed to be not feasible to construct and is not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks and additional costs.

6.5 Site 8 with Option A or Option B

6.5.1 Description

Site 8 is located north of the airfield and southwest of East Airways Boulevard (see **Figure 3**). Thus, construction at this location would not require the demolition of the existing ATCT. The site is currently vacant and is north of an aircraft apron associated with a cargo facility.

6.5.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. Due to the location of this site, in relation to future Airport development and existing visual obstructions, a tower at this site would need to be so tall that it would encroach into the precision approach protection zone. Therefore, this alternative is not feasible to construct.

6.5.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Site 8 would result in an ATCT that meets the following Proposed Project need:

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   1. Does not meet current FAA, State, and local building standards because the new ATCT would encroach into the precision approach protection zone, which would not meet FAA safety standards;

   2. Provides inadequate height and obstructed lines of sight because it would have obstructed views of the ends of Runways 29R and 29L because of trees located offsite at the adjacent golf course and the location on the airfield would result in glare issue from the sun for ATCs. ATCTs located on this side of the airfield would also be facing into the sun in the afternoon, resulting in glare;

   3. The obstructed lines of sight of the ends of Runways 29R and 29L would also result in operational inefficiencies due to delay in relaying information to pilots;

   4. Results in high costs of repairs to the existing facility in order to preserve the integrity of the building; and

   6. Is not consistent with approved Airport plans to demolish the existing ATCT and that show this location as future cargo development (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, Site 8 would encroach into the precision approach protection zone and result in obstructed lines of sight due to obstructed lines of sight of the ends of Runways 29R and 29L. This is not consistent with FAA safety standards and results in potential aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

No severe social, economic, environmental, or community impacts would occur by implementing an ATCT at Site 8.

4. Cost

   This site is currently not developed, so construction of this alternative would potentially involve complex site conditions (grading, excavation, foundation work, utility relocations, etc.). Utilities would have to be extended from the cargo facility to the south of the site or from the animal shelter facilities across East Airways Boulevard. Additionally, the extra height needed for an ATCT at this site would result in additional costs. Therefore, due to the condition of the site, a longer construction duration to account for the site conditions, and the required height of the ATCT, this alternative would result in disproportionately higher costs due to construction methods or materials.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative is not feasible to construct, would not meet the purpose and need, and has additional costs associated with construction on an undeveloped site and from the height of the ATCT. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.5.4 Avoidance Alternative Determination

Site 8 would avoid use of the Section 4(f) property; however, it is deemed not feasible to construct and is not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks and additional costs.

6.6 Site 13 with Option A or Option B

6.6.1 Description

Site 13 would construct a new ATCT facility at a similar location that overlaps with the Proposed Project, (see **Figure 3**); however, the existing ATCT would not be demolished. Site 13 is approximately 250 feet south of the existing ATCT on a parcel that is adjacent to the ARFF station, an airport maintenance building, and a vehicle parking lot. The new facility would have an estimated building footprint of 13,000 sq ft. The floor of the cab would be 150 feet tall; 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 approximately 190 feet. Access to the new facility would remain the same as to the existing ATCT, which is accessible from East Andersen Avenue.

6.6.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. This alternative would be feasible to construct.

6.6.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

Site 13 would result in an ATCT that meets the following Proposed Project needs:

1. Meets current FAA, State, and local building standards, even though the existing facility would continue to not meet this need; and

5. Is secure from unauthorized access.

This alternative would not meet the following Proposed Project needs:

2. Provides inadequate height and obstructed lines of sight because the existing ATCT would block the line of sight from the new ATCT to a portion of Taxiway A;

3. The obstructed lines of sight would also result in operational inefficiencies due to the potential disruption between pilot and ATC communication;

4. Results in high costs of repairs and refurbishments to the existing facility in order to preserve the integrity of the building; and

6. Is not consistent with approved Airport plans to demolish the existing ATCT (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, this site would result in obstructed lines of sight to a portion of Taxiway A. This results in potential aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   Utility services to the new facility would be connected from existing utility systems, as shown in **Figure 1**. The new ATCT facility would be constructed adjacent to existing buildings. Utility connections are accessible, and in close proximity, and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT. Because Site 13 is already developed and utility infrastructure is present, it is unlikely to result in costs of an extraordinary magnitude.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need and would result in potential safety risks. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.6.4 Avoidance Alternative Determination

Site 13 would avoid use of the Section 4(f) property; however, it is deemed not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks.

6.7 Site 2

6.7.1 Description

Site 2 would include retaining the existing ATCT at its current location (see **Figure 3**) and continuing its use as the FAT ATCT. The building would be required to be updated to meet current State and local building requirements, such as seismic, fire, and ADA standards. However, because the facility would also continue to be used for ATC operations, the ATCT would be rehabilitated to meet the current FAA space and height requirements detailed in FAA Order 6480.7E, *Airport Traffic Control Tower (ATCT) and Terminal Radar Approach Control (TRACON) Design Policy*. To meet these requirements, the height of the existing 94-foot tower would need to be increased by approximately 65 feet to meet line-of-sight requirements and the cab would need to be expanded from approximately 350 sq ft to 440 sq ft to meet cab size requirements based on Airport activity and staffing levels. Therefore, this option would require extensive upgrades and repairs that could negatively affect features that contribute to the eligibility of the ATCT as a historic resource, including extending the height of the tower and expanding or replacing the cab at the top of the tower.

6.7.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. This alternative would be feasible to construct.

6.7.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Site 2 would require extensive upgrades and repairs. As indicated by FAA and Airport personnel, the existing ATCT is “outdated and in need of nearly $10M in improvements and upgrades” (City of Fresno, 2019a). Assuming the upgrades and repairs can successfully bring the existing ATCT up to current FAA space and height requirements and State and local building standards, Site 2 would result in an ATCT that meets the following Proposed Project needs:

   1. Meets current FAA, State, and local building standards;

   2. Provides adequate height and unobstructed lines of sight;

   3. Allows for operational efficiency by removing the partial obstruction of the aircraft apron immediately east of the terminal through the increase in the tower height accomplished during the improvements and upgrades to the existing ATCT; and

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   4. Results in high costs of repairs and disruptions to facility operations due to continuous maintenance; and

   6. Is not consistent with approved Airport Plans to demolish the existing ATCT.

2. Safety or Operational Considerations

Because the existing ATCT was constructed in 1961, it is likely to contain lead paint and polychlorinated biphenyl (PCBs). These materials would be encountered during the extensive renovations needed to rehabilitate the ATCT. Lead-based paint was used extensively prior to 1978 and leaving the paint in place would increase the risk of exposure to employees as the paint deteriorates posing a potential danger to human and environmental health. PCBs were manufactured in several construction and industrial materials between 1929 and 1979. Leaving PCB containing materials in place increases the risk of employee exposure over time as materials deteriorate. Additionally, due to the level of rehabilitation required to bring the existing ATCT up to current standards, ATC operations are likely to be interrupted throughout the construction process. Therefore, this alternative would have safety considerations related to human and environmental health and operational considerations due to interruption of ATC operations.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   The cost of rehabilitating the existing ATCT for continued use is expected to be similar to the cost of replacement.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need and would result in potential safety risks. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.7.4 Avoidance Alternative Determination

Site 2 would avoid use of the Section 4(f) property; however, it is deemed not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks.

6.8 Sites 3 and 11 with Option A or Option B

6.8.1 Description

Sites 3 and 11 are located at the intersection of East Andersen Avenue and North Fine Avenue on the southwest side of the airfield in a small remote parking lot surrounded by vacant land, approximately 1,340 feet northwest of the existing ATCT (see **Figure 3**). Access to the building would be provided from East Andersen Avenue or North Fine Avenue.

The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 3**. The floor of the cab would be 200 feet tall; 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 240 feet. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

6.8.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. This alternative would be feasible to construct.

6.8.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Sites 3 and 11 would result in an ATCT that meets the following Proposed Project needs:

   1. Meets current FAA, State, and local building standards, even though the existing facility would continue to not meet this need;

   2. Is of adequate height and unobstructed line of sight;

   3. Allows for operational efficiency; and

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   4. Results in high costs of repairs to the existing facility in order to preserve the integrity of the building; and

   6. Is not consistent with approved Airport plans to demolish the existing ATCT and that continue to show this location as an aircraft apron (City of Fresno, 2019a).

2. Safety or Operational Considerations

   Sites 3 and 11 would not result in any safety or operational considerations.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   The height of the structure at this location would be approximately 50 feet taller than the height required at other alternative locations. Additionally, as the site is undeveloped, the construction of this alternative would potentially involve complex site conditions (grading, excavation, foundation work, utility relocations, etc.). Utilities would have to be extended from the facilities either across East Andersen Avenue or North Fine Avenue to reach Sites 3 and 11. Therefore, due to the condition of the site, a longer construction duration to account for the site conditions, and the required height of the ATCT, this alternative would result in disproportionately higher costs due to construction methods or materials.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need and has additional costs associated with construction on an undeveloped site and from the height of the ATCT. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.8.4 Avoidance Alternative Determination

Sites 3 and 11 would avoid use of the Section 4(f) property; however, they are deemed not feasible to construct and not prudent because it would not meet the purpose and need of the Proposed Project and would result in additional costs.

6.9 Site 13A with Option A or Option B

6.9.1 Description

Site 13A is located within the parking lot of the existing ATCT, approximately 140 feet southwest of the existing facility (see **Figure 3**). The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 3**. The floor of the cab would be 150 feet tall; 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. Access to the new facility would remain the same as to the existing ATCT, which is accessible from East Andersen Avenue. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

6.9.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. This alternative would be feasible to construct.

6.9.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Site 13A would result in an ATCT that meets the following Proposed Project needs:

   1. Meets current FAA, State, and local building standards, even though the existing facility would continue to not meet this need; and

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   2. Provides inadequate height and obstructed lines of sight because the existing ATCT would block the line of sight from the new ATCT to a portion of Taxiway A;

   3. Results in operational inefficiencies due to the potential disruption between pilot and ATC communication based on the obstructed lines of sight;

   4. Results in high costs of repairs and refurbishments to the existing facility in order to preserve the integrity of the building; and

   6. Is not consistent with approved Airport plans to demolish the existing ATCT (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, this site would result in obstructed lines of sight due to obstructed lines of sight to a portion of Taxiway A. This results in potential aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   Utility services to the new facility would be connected to the new facility from existing utility systems. Similar to the Proposed Project, utility connections are accessible in close proximity and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT. Because Site 13A is already developed and utility infrastructure is present, it is unlikely to result in costs of an extraordinary magnitude.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need and would result in potential safety risks. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.9.4 Avoidance Alternative Determination

Site 13A would avoid use of the Section 4(f) property; however, it is deemed not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks.

6.10 Site 6 with Option A or B

6.10.1 Description

Site 6 is located within the parking lot of the existing ATCT, approximately 100 feet south of the existing facility (see **Figure 3**). The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 3**. The floor of the cab would be 100 feet tall; 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 140 feet. Access to the new facility would remain the same as to the existing ATCT, which is accessible from East Andersen Avenue. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

6.10.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. This alternative would be feasible to construct.

6.10.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Site 6 would result in an ATCT that meets the following Proposed Project needs:

   1. Meets current FAA, State, and local building standards, even though the existing facility would continue to not meet this need; and

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   2. Provides inadequate height and obstructed lines of sight because Site 6 would not correct the parallax issue identified under need 2 because from the new ATCT, ATCs would continue to not be able to determine if a pilot is lined up to land on Runway 29R or Runway 29L;

   3. Results in operational inefficiencies from impeded communication between pilots and ATCs;

   4. Results in high costs of repairs and refurbishments to the existing facility in order to preserve the integrity of the building; and

   6. Is not consistent with approved Airport plans to demolish the existing ATCT (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, this site would result in obstructed lines of sight due to obstructed lines of sight to the ends of Runways 29R and 29L, resulting in a parallax issue. This results in potential aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   Utility services to the new facility would be connected to the new facility from existing utility systems. Similar to the Proposed Project, utility connections are accessible in close proximity and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT. Because Site 6 is already developed and utility infrastructure is present, it is unlikely to result in costs of an extraordinary magnitude.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need and would result in potential safety risks. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.10.4 Avoidance Alternative Determination

Site 6 would avoid use of the Section 4(f) property; however, it is deemed not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks.

6.11 Sites 5, 12, and 12A with Option A or B

6.11.1 Description

Sites 5, 12, and 12A are located across the airfield from the existing ATCT on a vacant parcel off North Cargo Lane (see **Figure 3**). The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 3**. The floor of the cab would be 120 feet tall; 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 160 feet. Access to the building would be provided from North Cargo Lane via East Airways Boulevard. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

6.11.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. Due to the location of this site, in relation to future Airport development and existing visual obstructions, a tower at this site would need to be so tall that it would encroach into the precision approach protection zone. The precision approach is what guides planes vertically, down to the runway. Therefore, this alternative is not feasible to construct.

6.11.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of an avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   Sites 5, 12, and 12A would result in an ATCT that meets the following Proposed Project needs:

   1. Meets current FAA, State, and local building standards, even though the existing facility would continue to not meet this need; and

   5. Is secure from unauthorized access.

   This alternative would not meet the following Proposed Project needs:

   2. Provides inadequate height and obstructed lines of sight because Sites 5, 12, and 12A would present new line of sight issues due to the location and angle of an ATCT at this location. From the new ATCT, ATCs would have difficulty discerning between Taxiways A and B and would continue to have a parallax issue at Runway 29L because of the increased distance from the runway end. Additionally, the angle of the new ATCT would result in the afternoon/evening sun in the eyes of the ATCs;

   3. The obstructed lines of sight would also result in operational inefficiencies due to delay in relaying information to pilots;

   4. Results in high costs of repairs to the existing facility in order to preserve the integrity of the building; and

6. Is not consistent with approved Airport plans to demolish the existing ATCT and that show this location as future hangar or cargo development (City of Fresno, 2019a).

2. Safety or Operational Considerations

   As stated above, this site would result in obstructed lines of sight due to difficulty discerning between Taxiways A and B and the continued parallax issue at Runway 29L. This results in potential aircraft incursions and delayed ATC pilot instructions.

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts would occur by implementing this alternative.

4. Cost

   Sites 5, 12, and 12A are currently not developed, so construction of this alternative would potentially involve complex site conditions (grading, excavation, foundation work, utility relocations, etc.). Utilities would have to be extended from the hangar facility to the northwest of the site or from the animal shelter facilities across East Airways Boulevard. Additionally, the extra height needed for an ATCT at this site would result in additional costs. Therefore, due to the condition of the site, a longer construction duration to account for the site conditions, and the required height of the ATCT, this alternative would result in disproportionately higher costs due to construction methods or materials.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet the purpose and need and has additional costs associated with construction on an undeveloped site. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.11.4 Avoidance Alternative Determination

Sites 5, 12, and 12A would avoid use of the Section 4(f) property; however, it is deemed not prudent because it would not meet the purpose and need of the Proposed Project and would result in potential safety risks and additional costs.

6.12 No Action Alternative

6.12.1 Description

Under the No Action Alternative, the existing ATCT facility would not be demolished or undergo any major renovations or repairs. The existing ATCT would continue to be used for ATC operations. The City would not construct a new ATCT facility, new equipment would not be installed, and no other improvements would be made at the site. The City would continue to pay for regular maintenance and repairs to infrastructure, equipment, and systems that break down. The facility would not meet current FAA space and height requirements, and it would not be brought up to State and local building requirements.

6.12.2 Evaluation of Feasibility

Section 4(f) states that an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. FAA and the City determined that the No Build Alternative would be feasible from an engineering perspective, because no construction would be required to implement the alternative.

6.12.3 Evaluation of Prudence

Section 1.1.1.3 lists the Section 4(f) criteria used by FAA to determine the prudence of a full avoidance alternative.

1. Effectiveness in Meeting Purpose and Need

   The No Action Alternative would not meet any of the Proposed Project needs:

   1. Would not provide a new ATCT facility or undergo any major renovations or repairs to meet current FAA, State, and local building standards;

   2. Would not result in a facility that provides adequate height and unobstructed lines of sight because the existing parallax issue for ATCs looking at Runways 29R and 29L is not corrected and ATCs would not be able to determine if a pilot is lined up to land on the correct runway;

   3. Would not allow for operational efficiency;

   4. Would continue to require high cost repairs and result in disruptions to facility operations due to continuous maintenance;

   5. Would continue to not be secure from unauthorized access; and

   6. Is not consistent with approved Airport plans that call for a new ATCT facility.

2. Safety or Operational Considerations

   Because the existing ATCT was constructed in 1961, it is likely to contain lead paint and polychlorinated biphenyl (PCBs). These materials would be encountered during the extensive renovations needed to rehabilitate the ATCT. Lead-based paint was used extensively prior to 1978 and leaving the paint in place would increase the risk of exposure to employees as the paint deteriorates posing a potential danger to human and environmental health. PCBs were manufactured in several construction and industrial materials between 1929 and 1979. Leaving PCB containing materials in place increases the risk of employee exposure over time as materials deteriorate. Additionally, ATC operations are likely to be interrupted with required ongoing maintenance and repairs. Therefore, this alternative would have safety considerations related to human and environmental health and operational considerations due to interruption of ATC operations

3. Social, Economic, Environmental, or Community Impacts

   No severe social, economic, environmental, or community impacts, would occur by implementing this alternative.

4. Cost

   Costs associated with the No Action Alternative would be associated with regular maintenance and required repairs, including the purchase of special-order parts. Additional

costs may also be attributed to staffing shortages related to the lack of ADA access to the ATCT cab when the elevator is out of order. Therefore, while this alternative would have lower construction costs, there would be ongoing costs of unknown magnitude.

5. Unique Problems or Unusual Factors

   No unique problems or unusual factors exist.

6. Cumulative Impacts of Extraordinary Magnitude

   This alternative would not meet all the purpose and need and would result in potential safety risks. When considered together, this results in cumulative impacts of extraordinary magnitude.

6.12.4 Avoidance Alternative Determination

The No Action Alternative would avoid use of the Section 4(f) property, but it is deemed not prudent because it does not meet the purpose and need of the Proposed Project and would result in potential safety risks.

6.13 Preliminary All Possible Planning to Minimize Harm Analysis

In addition to a determination that there is no feasible and prudent alternative that avoids the use of a Section 4(f) resource, the Section 4(f) regulations also states that FAA may not approve the use of a Section 4(f) resource unless it determines that the proposed action includes all possible planning, as defined in 23 CFR 774.17, to minimize harm to the property resulting from such use.

In evaluating the measures to minimize harm, FAA will consider the preservation purpose of the Section 4(f) statute and:

- The view of the OWJ over the Section 4(f) property;
- Whether the cost of the measures is a reasonable public expenditure in light of the adverse impacts of the project on the Section 4(f) property and the benefits of the measure to the property; and
- Any impacts or benefits of the measures to communities or environmental resources outside of the Section 4(f) property.

Avoidance alternatives and options to alternatives were identified based on comments received from the City's Historic Preservation Commission (HPC) during the scoping period for the California Environmental Quality Act (CEQA) Environmental Impact Report (EIR) in April 2024. Commenters requested that all options to retain the existing ATCT and avoid demolition be evaluated, including retaining the tower as a historic feature or for another use. From these comments, Options A and B were developed and Site 2 was advanced for evaluation in the EA as Alternative 2.

Project staff consulted with SHPO and identified two consulting parties during the development of the Proposed Project, the City's Planning and Development Department and HPC and the Fresno County Historical Society (FCHS). Through consultation and coordination with SHPO and the consulting parties, mitigation measures were developed to avoid, minimize, and/or mitigate adverse effects from construction and operation of the Proposed Project.

On November 18, 2024, FAA and the City held a consultation meeting with SHPO to review the Proposed Project and inform SHPO, as the OWJ over the Section 4(f) property, of the proposed use of the Section 4(f) resource. Following the meeting with SHPO, a draft Section 106 Memorandum of Agreement (MOA) was prepared to document mitigation measures for the adverse effect on the historic property. Comments from SHPO and the consulting parties were solicited on the draft MOA. A meeting was held on January 31, 2025, between FAA, the City, SHPO, and the consulting parties to review comments on the draft MOA, identify how comments are being addressed, discuss mitigation measures, and to identify next steps.

The consultation process, including meetings, is ongoing and will continue to proceed through execution of the MOA. Appendix B of the Environmental Assessment (EA) includes the Section 106 consultation materials to date, including the draft MOA.

Preliminary All Possible Planning to Minimize Harm Determination: Based on the summary within this section, FAA has preliminarily determined in accordance with 23 CFR 774.17 that all possible planning to minimize harm will be conducted and implemented through the completion of the project's Section 106 process with the execution of the Project's MOA prior to the issuance of the National Environmental Policy Act (NEPA) decision document.

6.14 Preliminary Least Overall Harm Analysis

Per 23 CFR 774.3(c), if the Section 4(f) analysis for a property that would be used by a project concludes that there is no feasible and prudent avoidance alternative, then FAA may approve, from among the remaining alternatives that use Section 4(f) property, only the alternative that causes the least overall harm in light of the statute's preservation purpose. If the assessment of least overall harm finds that two or more alternatives are substantially equal, FAA can approve any of those alternatives. To determine which of the alternatives would cause the least overall harm, FAA must compare seven factors set forth in 23 CFR 774.3(c)(1) concerning the alternatives under consideration (see **Section 1.1.1.5** for a description of those seven criteria).

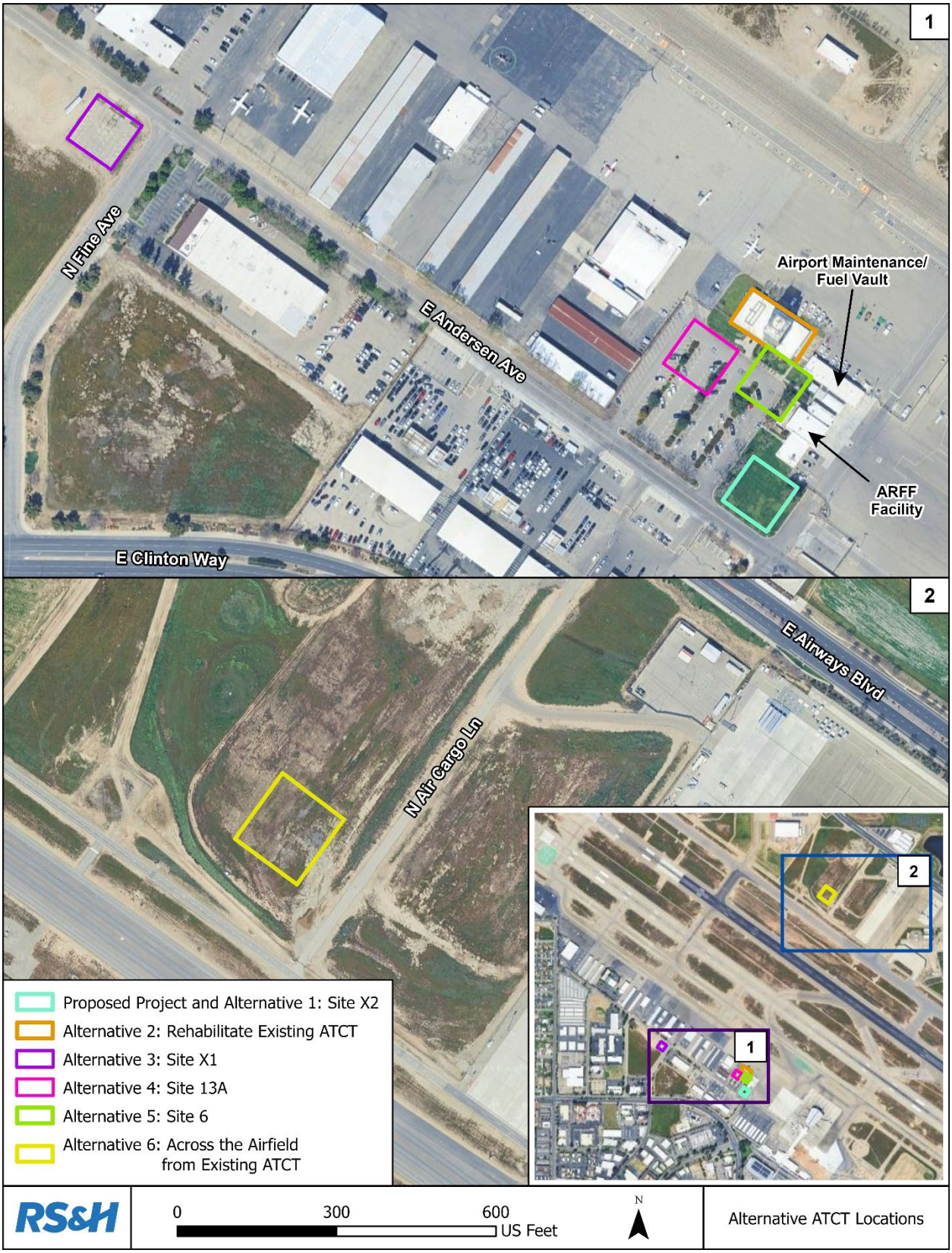
The consultation process, including meetings, is ongoing and will continue to proceed through execution of the MOA. A final determination of least overall harm requires the completion of the process to determine all possible planning to minimize harm. Because the ATCT is a Section 106 resource, all possible planning to minimize harm will be completed when the Section 106 process concludes with an executed MOA. The MOA will specify how the Proposed Project will resolve the preliminary adverse effect it would have on the ATCT.

The Draft EA evaluates a total of six alternatives in addition to the No Action Alternative. With the exception of Alternative 2, each alternative identified in the EA includes three options on how the existing ATCT can be treated. These options are: Option A, preserve the ATCT in place; Option B, retain the existing ATCT for other uses, as described in **Section 6**; and Option C, demolish the existing ATCT facility once the new ATCT is fully operational.

The six alternatives in the EA are shown in **Figure 4** and described below.

1. Alternative 1: Site X2 with Options A, B, and C. Alternative 1 (Site X2) would construct a new ATCT facility approximately 250 feet south of the existing ATCT on a parcel that is also adjacent to the ARFF station, an Airport maintenance building, and a vehicle parking lot. The new facility would have an estimated building footprint of 13,000 sq ft and be approximately 190 feet tall. Access to the new facility would remain the same as

Figure 4: ATCT Alternatives Evaluated in the Environmental Assessment



Source: RS&H, 2024; City of Fresno, 2024; CTBX, 2024

to the existing ATCT, which is accessible from East Andersen Avenue. Site X2 was developed from Site 13, which was identified in the 2010 draft study (**Section 6.6**) and was evaluated in the 2024 Siting Study.

2. Alternative 2: Rehabilitate Existing ATCT for Continued Use at FAT. Alternative 2 would include retaining the existing ATCT at its current location and continuing its use as the FAT ATCT. The ATCT would be required to be updated to meet current State and local building requirements, such as seismic, fire, and ADA standards. However, because the facility would also continue to be used for ATC operations, the ATCT would be rehabilitated to meet the current FAA space and height requirements detailed in FAA Order 6480.7E, *Airport Traffic Control Tower (ATCT) and Terminal Radar Approach Control (TRACON) Design Policy*. To meet these requirements, the height of the existing 94-foot tower would need to be increased by approximately 65 feet to meet line-of-sight requirements and the cab would need to be expanded from approximately 350 sq ft to 440 sq ft to meet cab size requirements based on Airport activity and staffing levels. Therefore, this option would require extensive upgrades and repairs that could negatively affect features that contribute to the eligibility of the ATCT as a historic resource, including extending the height of the tower and expanding or replacing the cab at the top of the tower. Alternative 2 is at the same location as Site 2 (**Section 6.7**) which was identified in the 2010 draft study.
3. Alternative 3: Site X1 with Options A, B, and C. Alternative 3 (Site X1) is located at the intersection of East Andersen Avenue and North Fine Avenue on the southwest side of the airfield in a small remote parking lot surrounded by vacant land, approximately 1,340 feet northwest of the existing ATCT. Access to the building would be provided from East Andersen Avenue or North Fine Avenue. The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for Alternative 1. The floor of the cab would be 200 feet tall; 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 240 feet. Site X1 was developed from Sites 3 and 11, which were identified in the 2010 draft study (**Section 6.8**) and was evaluated in the 2024 Siting Study.
4. Alternative 4: Site 13A with Options A, B, and C. Alternative 4 (Site 13A) is located within the parking lot of the existing ATCT, approximately 140 feet southwest of the existing facility. The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for Alternative 1. The floor of the cab would be 150 feet tall; 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. Access to the new facility would remain the same as to the existing ATCT, which is accessible from East Andersen Avenue. Site 13A was identified in the 2010 draft study (**Section 6.9**) and evaluated in the 2024 Siting Study.
5. Alternative 5: Site 6 with Options A, B, and C. Alternative 5 (Site 6) is located within the parking lot of the existing ATCT, approximately 100 feet south of the existing facility. The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for Alternative 1. The floor of the cab would be 100 feet tall; 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 140 feet. Access to the new facility would remain the same as to the existing ATCT, which is accessible from East Andersen Avenue. Site 6 was identified in the 2010 draft study (**Section 6.10**) and evaluated in the 2024 Siting Study.

6. Alternative 6: Across the Airfield from the Existing ATCT with Options A, B, and C. Alternative 6 is located across the airfield from the existing ATCT on a vacant parcel off North Cargo Lane. The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for Alternative 1. The floor of the cab would be 120 feet tall; 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 160 feet. Access to the building would be provided from North Cargo Lane via East Airways Boulevard. Alternative 6 was developed from Sites 5, 12, and 12A, which were identified in the 2010 draft study (**Section 6.11**).

Of the six alternatives evaluated in the EA, three of the alternatives would meet the purpose and need of the Proposed Project but would result in the physical use of the ATCT. These alternatives are Alternative 1: Site X2 with Option C (Proposed Project), Alternative 3: Site X1 with Option C and Alternative 4: Site 13A with Option C. Following is a description of these alternatives that remained under consideration.

6.14.1 Alternative 1: Site X2 with Option C (Proposed Project)

Using the seven factors to determine least overall harm, the Alternative 1: Site X2 with Option C would:

1. Mitigate adverse effects to the Section 4(f) property through the implementation of the MOA;
2. Result in no remaining harm, after implementation of the MOA, to the protected activities, attributes, or features that qualify the ATCT as a Section 4(f) property;
3. Affect the existing ATCT property, which is the same property affected by all alternatives, so is of equal relative significance;
4. Incorporate the views of the OWJ over the Section 4(f) property as part of the MOA process;
5. Meet all six needs for the Proposed Project;
6. Have no significant adverse effects on other resources not protected by Section 4(f); and
7. Have similar cost to construct as Alternative 4.

6.14.2 Alternative 3: Site X1 with Option C

Using the seven factors to determine least overall harm, Alternative 3: Site X1 with Option C would:

1. Mitigate adverse effects to the Section 4(f) property through the implementation of the MOA;
2. Result in no remaining harm, after implementation of the MOA, to the protected activities, attributes, or features that qualify the ATCT as a Section 4(f) property;

3. Affect the existing ATCT property, which is the same property affected by all alternatives, so is of equal relative significance;
4. Incorporate the views of the OWJ over the Section 4(f) property as part of the MOA process;
5. Meet all six needs for the Proposed Project;
6. Have additional or more substantial adverse effects on other resources not protected by Section 4(f) because Alternative 3 would disrupt landside operations as a result of the need to develop additional landside infrastructure; and
7. Be the costliest of all alternatives. Due to the height of the structure and the condition of the site, this alternative would result in disproportionately higher costs of construction when compared to other alternatives, would be subject to unavoidable complex site conditions, and would result in higher costs due to construction methods or materials, and would have a longer construction duration.

6.14.3 Alternative 4: Site 13A with Option C

Using the seven factors to determine least overall harm, Alternative 4: Site 13A with Option C would:

1. Mitigate adverse effects to the Section 4(f) property through the implementation of the MOA;
2. Result in no remaining harm, after implementation of the MOA, to the protected activities, attributes, or features that qualify the ATCT as a Section 4(f) property;
3. Affect the existing ATCT property, which is the same property affected by all alternatives, so is of equal relative significance;
4. Incorporate the views of the OWJ over the Section 4(f) property as part of the MOA process;
5. Meet all six needs for the Proposed Project;
6. Have additional or more substantial adverse effects on other resources not protected by Section 4(f) because Alternative 4 would result in disruptions to ATC operations from vibrations, construction noise, construction emissions, or staging; and
7. Have similar cost to construct as the Proposed Project.

6.14.4 Conclusion of Least Overall Harm Analysis

Looking at the seven factors described in **Section 1.1.1.5** and detailed above, when comparing the three alternatives that meet the purpose and need, Alternative 3: Site X1 with Option C would have additional or more substantial adverse effects on other resources not protected by Section 4(f) and would be the costliest. Alternative 4: Site 13A with Option C would have additional or more substantial adverse effects on other resources not protected by Section 4(f). Alternative 1: Site X2 with Option C would not result in any additional adverse effects on other resources not protected by Section 4(f) and would not be the costliest. Therefore, when comparing the evaluation of the seven factors that are used to determine which of the alternatives would cause the least overall harm, Alternative 1: Site X2 with Option C has been preliminarily determined to be the alternative with the least overall harm. The final least overall

harm analysis determination is based on the execution of the MOA and will be included in the Final EA.

7 COORDINATION

7.1 Department of Interior

To comply with Section 4(f), FAA initiated consultation with SHPO as the OWJ with jurisdiction over the Section 4(f) resource. The FAA will initiate consultation with DOI OEPC with the release of the Draft EA, including the Section 4(f) Evaluation, for a 45-day public and agency comment period. The FAA determined there are no feasible and prudent alternatives to the physical use of the existing ATCT, a Section 4(f) resource, and that the Proposed Project includes all possible planning to minimize harm resulting from such physical use. The Proposed Project includes mitigation measures to resolve adverse effects to the existing ATCT, which are included in a draft MOA (see **Appendix D** to this EA).

7.2 Officials with Jurisdiction and Section 106 Consulting Parties

FAA hosted an online kickoff meeting on November 18, 2024, with the City of Fresno and its consultants and SHPO to discuss the Section 106 process and inform SHPO about the preparation of the MOA and the use of a Section 4(f) resources.

The FAA sent out invitations to the following two potential consulting parties on December 5, 2024: (1) City of Fresno HPC and (2) the FCHS.

On January 31, 2025, FAA held an online consultation meeting with the City of Fresno (representatives from the Airport and the Planning and Development Department as a Consulting Party and as liaisons to the HPC), the City's consultants, the FCHS, and SHPO. Participants discussed input received from the Consulting Parties on the draft MOA, MOA stipulations, and mitigation measures. Mitigation measures were refined through subsequent coordination and outlined in the draft MOA.

In addition, the FAA sent out Native American consultation invitations on July 1, 2024 to the following 11 tribal communities that have an interest in Fresno County: (1) Amah Mutsun Tribal Band; (2) Dumna Wo-Wah Tribal Government; (3) Kitanemuk & Yowlumne Tejon Indians; (4) Northern Valley Yokut, Ohlone Tribe; (5) North Fork Rancheria of Mono Indians; (6) Picayune Rancheria of the Chukchansi Indians; (7) Santa Rosa Rancheria Tachi Yokut Tribe; (8) Table Mountain Rancheria; (9) Traditional Choinumni Tribe; (10) Tule River Indian Tribe; and (11) 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.

The FAA notified the Advisory Council on Historic Preservation (ACHP) of the determination of adverse effect and intention to enter into a MOA specified documentation on December 5, 2024. The ACHP chose not to participate in the consultation on December 20, 2024.

7.3 Public

A Draft EA was prepared during the NEPA process. FAA published a notice of availability for the Draft EA, including the Section 4(f) Evaluation, in the Fresno Bee and on the Airport's website (https://flyfresno.com/statistics/) on **June 20, 2025**. The Draft EA, including the Section 4(f)

Evaluation, is being made available for a 45-day review period (ending at **5:00 p.m. Pacific Daylight Time August 4, 2025**) at the Airport's Administrative Office, the City Planning and Development office, at the Betty Rodriguez Regional Library in Fresno, California, at the FAA's Airport District Office in Walnut Creek, California, and the Airport's website (https://flyfresno.com/statistics/), and the City's Planning website (https://www.fresno.gov/planning/plans-projects-under-review/#airport-tower-relocation-project).

Written comments may be emailed to AirportEnvironmental@fresno.gov or by mail to the following address:

Fresno-Yosemite International Airport
ATTN: Francisco Partida
Address: 4995 East Clinton Way
Fresno, California 93727-1525

Comments on the Draft EA, including the Section 4(f) Evaluation, will be addressed, as appropriate, in the Final EA. The Final EA will be made available at the Airport's Administrative Office, the City Planning and Development office, at the Betty Rodriguez Regional Library in Fresno, California, at the FAA's Airport District Office in Walnut Creek, California, on the Airport's website, and the City's Planning website.

8 PRELIMINARY SECTION 4(F) DETERMINATION

Based on the analysis completed, FAA and the City determined that the Proposed Project would result in a physical use to a Section 4(f) resource and there is no feasible and prudent alternative that would avoid this use. In addition, FAA determined that all possible planning to minimize harm will be completed through the Proposed Project's Section 106 process through the execution of a Section 106 Agreement. FAA and the City determined that Alternative 1: Site X2 with Option C will be the alternative that will result in the least overall harm to the historic resource.

ATTACHMENT 1: SECTION 4(F) CONSULTATION MATERIALS