

APPENDIX H.
PUBLIC INVOLVEMENT

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Notice of Availability

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NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL ASSESSMENT AND 45-DAY REVIEW PERIOD

Airport Traffic Control Tower Replacement
Fresno Yosemite International Airport (FAT)
Draft Environmental Assessment

Fresno, California

Pursuant to Paragraphs 6-2.2(g) of Federal Aviation Administration (FAA) Order 1050.1F, *Environmental Impacts: Policy and Procedures*, the National Historic Preservation Act (36 CFR § 800.2), and Section 4(f) of the Department of Transportation Act of 1966, (23 CFR § 774.5), notice is hereby given by FAA and the City of Fresno (City) that a Draft Environmental Assessment (Draft EA) has been prepared to evaluate the potential environmental effects for the proposed replacement of the existing Airport Traffic Control Tower (ATCT) facility and associated infrastructure (Proposed Project) at the Fresno Yosemite International Airport (FAT or Airport) and is available for review.

The Proposed Project includes the following components:

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

The Draft EA evaluates the potential environmental effects of the Proposed Project and the No Action Alternative and has been prepared pursuant to the requirements of Section 102(2)(C) of the National Environmental Policy Act of 1969 (NEPA), FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

FAA is the lead federal agency to ensure compliance with NEPA for airport development actions and the City is the project sponsor. The Draft EA includes an analysis of reasonable alternatives, potential environmental impacts, and mitigation measures, as appropriate. FAA has preliminarily determined that the ATCT is eligible for listing on the National Register of Historic Places, and the Proposed Project would have an adverse effect on the historic property. The

adverse effect finding constitutes a Section 4(f) use under the Department of Transportation Act of 1966. This Draft EA includes the draft Section 4(f) evaluation and draft Section 106 Memorandum of Agreement.

Upon consideration of comments received on the Draft EA, the FAA will determine the adequacy of the environmental document. If further documentation is necessary, preparing an Environmental Impact Statement (EIS) or revising the Draft EA would accomplish this. If an EIS is not necessary, the FAA will prepare a Final EA and a Finding of No Significant Impact.

Public Review and Comment

The public is invited to review the Draft EA and submit comments. The purpose of the public comment period is to receive comments on the Draft EA. Comments should be as specific as possible and should be organized so that they are meaningful and make the FAA clearly aware of the commenter's views, interests, and concerns related to the Proposed Project.

Beginning on June 22, 2025, the Draft EA will be available for public review through August 6, 2025. The Draft EA can be viewed electronically on 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>. A hard copy of the Draft EA can be viewed in person during regular business hours at the locations below.

| Location Name | Address |
|---|---|
| Fresno Yosemite International Airport Administrative Office | 4995 East Clinton Way, Fresno, California 93727 |
| City Planning and Development Office | 2600 Fresno Street, Room 3043, Fresno, CA 93721 |
| FAA's Airport District Office | 2999 Oak Road Suite 200, Walnut Creek, CA 94597 |
| Betty Rodriguez Regional Library | 3040 N. Cedar Avenue, Fresno, CA 93703 |

Written comments may be submitted by email: AirportEnvironmental@fresno.gov and U.S. mail:

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

Comments received on the Draft EA and the responses to those comments will be disclosed in the Final EA. Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

All comments must be received by 5:00 p.m. PDT on August 6, 2025, to be considered for this Draft EA.

The Beaufort Gazette
 The Belleville News-Democrat
 Bellingham Herald
 Centre Daily Times
 Sun Herald
 Idaho Statesman
 Bradenton Herald
 The Charlotte Observer
 The State
 Ledger-Enquirer

Durham | The Herald-Sun
 Fort Worth Star-Telegram
 The Fresno Bee
 The Island Packet
 The Kansas City Star
 Lexington Herald-Leader
 The Telegraph - Macon
 Merced Sun-Star
 Miami Herald
 El Nuevo Herald

The Modesto Bee
 The Sun News - Myrtle Beach
 Raleigh News & Observer
 Rock Hill | The Herald
 The Sacramento Bee
 San Luis Obispo Tribune
 Tacoma | The News Tribune
 Tri-City Herald
 The Wichita Eagle
 The Olympian

AFFIDAVIT OF PUBLICATION

| Account # | Order Number | Identification | Order PO | Cols | Depth |
|-----------|--------------|-----------------------|------------------------------|------|--------|
| 45550 | 18273 | Legal Ad - IPL0247639 | 250622_FAT_ATCT REPLACE-MENT | 2.0 | 194.0L |

ATTENTION: CITY OF FRESNO PLANNING & DEV IP
 2600 FRESNO STREET ROOM 3065
 FRESNO, CA 93721
 Gabriela.Fernandez@fresno.gov

COUNTY OF FRESNO
 STATE OF CALIFORNIA

The undersigned states:

McClatchy Newspapers in and on all dates herein stated was a corporation, and the owner and publisher of The Fresno Bee.

The Fresno Bee is a daily e-Edition and printed newspaper of general circulation now published, and on all-the-dates herein stated was published in the City of Fresno, County of Fresno, and has been adjudged a newspaper of general circulation by the Superior Court of the County of Fresno, State of California, under the date of November 28, 1994, Action No. 520058-9.

The undersigned is and on all dates herein mentioned was a citizen of the United States, over the age of twenty-one years, and is the principal clerk of the printer and publisher of said newspaper; and that the notice, a copy of which is hereto annexed, marked Exhibit A, hereby made a part hereof, was published in The Fresno Bee in each issue thereof (in type not smaller than nonpareil), on the following dates.

2.0 insertion(s) published on:

06/22/25 Print, 06/29/25 Print

[Print Tearsheet Link](#)

[Marketplace Link](#)



Sherry Chasteen

Sherry Chasteen



Amanda Rodela

Sworn to and subscribed before
 me on

Jun 30, 2025, 10:41 AM ED



Online Notary Public. This notarial act involved the use of online audio/video communication technology. Notarization facilitated by SIGNiX®

Comments received on the Draft EA and the responses to those comments will be disclosed in the Final EA. Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

All comments must be received by 5:00 p.m. PDT on August 6, 2025, to be considered for this Draft EA.

IPL0247639

Jun 22,29 2025

**DRAFT ENVIRONMENTAL ASSESSMENT
NOTICE OF AVAILABILITY CONTACT LIST**

California Department of Transportation, Division of Aeronautics
Office of Aviation Planning
Matthew Friedman, Office Chief
Aeronautics@dot.ca.gov

California State Historic Preservation Office
Tristan Tozer
tristan.tozer@parks.ca.gov

Central Valley Regional Water Quality Control Board
Patrick Pulupa, Executive Director
Patrick.Pulupa@waterboards.ca.gov

City of Fresno, Planning and Historic Preservation Commission
Jennifer Clark, Director of Development
jennifer.clark@fresno.gov / jennifer.laird@fresno.gov

Department of the Interior
Office of Environmental Policy and Compliance
Vallejo Regional Office
Viktoriya Sirova, REO
viktoriya_sirova@ios.doi.gov

Fresno City and County Historical Society
Elizabeth Laval, President
elaval@valleyhistory.org

Fresno County Airport Land Use Commission
Brenda Thomas
bthomas@fresnocog.org

Fresno County Council of Governments
Robert Phipps, Executive Director
robert@fresnocog.org

Fresno County, Development Services
Chris Motta, Division Manager
CMotta@fresnocountyca.gov

From: [Bouler, Karin](#)
To: Aeronautics@dot.ca.gov
Subject: Notice of Availability of Draft EA for the FAT Airport Traffic Control Tower Replacement
Date: Monday, June 23, 2025 6:10:01 AM
Attachments: [250622 FAT ATCT Replacement Draft EA NOA v3.0.pdf](#)

Mr. Matthew Friedman,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on Sunday, June 22, 2025, and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Thank you,
Karin Bouler

From: [Jacobson, Nani M \(FAA\)](#)
To: ["OHP, CALSHPO@Parks"](#)
Cc: ["Tozer, Tristan@Parks"](#)
Subject: Fresno Yosemite International Airport - Proposed Airport Traffic Control Tower Replacement - Draft Environmental Assessment Notice of Availability
Attachments: [FAT_ATCT_Replacement_NEPA_NOA_20250622.pdf](#)

Hello,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on June 22, 2025 and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Sincerely,

Nani M. Jacobson, M.Sc.

Environmental Protection Specialist, SFO-ADO
Federal Aviation Administration, Western Pacific Region
2999 Oak Rd, Suite 200
Walnut Creek, CA 94597
Phone: 925-546-6434

From: [Bouler, Karin](#)
To: Patrick.Pulupa@waterboards.ca.gov
Subject: Notice of Availability of Draft EA for the FAT Airport Traffic Control Tower Replacement
Date: Monday, June 23, 2025 6:11:12 AM
Attachments: [250622 FAT ATCT Replacement Draft EA NOA v3.0.pdf](#)

Mr. Patrick Pulupa,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on Sunday, June 22, 2025, and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Thank you,
Karin Bouler

From: [Bouler, Karin](#)
To: [Jennifer Clark](#)
Cc: [Jennifer Laird](#); [Ashley Atkinson](#)
Subject: Notice of Availability of Draft EA for the FAT Airport Traffic Control Tower Replacement
Date: Monday, June 23, 2025 6:12:41 AM
Attachments: [250622_FAT_ATCT Replacement Draft EA_NOA_v3.0.pdf](#)

Ms. Jennifer Clark,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on Sunday, June 22, 2025, and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Thank you,
Karin Bouler

From: [Jacobson, Nani M \(FAA\)](#)
To: ["viktoriya_siروا@ios.doi.gov"](mailto:viktoriya_siروا@ios.doi.gov)
Subject: Fresno Yosemite International Airport - Proposed Airport Traffic Control Tower Replacement - Draft Environmental Assessment Notice of Availability
Attachments: [FAT ATCT Replacement NEPA NOA 20250622.pdf](#)

Hello,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on June 22, 2025 and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Sincerely,

Nani M. Jacobson, M.Sc.

Environmental Protection Specialist, SFO-ADO
Federal Aviation Administration, Western Pacific Region
2999 Oak Rd, Suite 200
Walnut Creek, CA 94597
Phone: 925-546-6434

From: [Bouler, Karin](#)
To: bthomas@fresnocog.org
Subject: Notice of Availability of Draft EA for the FAT Airport Traffic Control Tower Replacement
Date: Monday, June 23, 2025 6:14:34 AM
Attachments: [250622 FAT ATCT Replacement Draft EA NOA v3.0.pdf](#)

Ms. Brenda Thomas,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on Sunday, June 22, 2025, and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Thank you,
Karin Bouler

From: [Bouler, Karin](#)
To: [Elizabeth Laval](#)
Subject: Notice of Availability of Draft EA for the FAT Airport Traffic Control Tower Replacement
Date: Monday, June 23, 2025 6:13:38 AM
Attachments: [250622 FAT ATCT Replacement Draft EA NOA v3.0.pdf](#)

Ms. Elizabeth Laval,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on Sunday, June 22, 2025, and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Thank you,
Karin Bouler

From: [Bouler, Karin](#)
To: bthomas@fresnocog.org
Subject: Notice of Availability of Draft EA for the FAT Airport Traffic Control Tower Replacement
Date: Monday, June 23, 2025 6:14:34 AM
Attachments: [250622 FAT ATCT Replacement Draft EA NOA v3.0.pdf](#)

Ms. Brenda Thomas,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on Sunday, June 22, 2025, and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Thank you,
Karin Bouler

From: [Bouler, Karin](#)
To: rhipps@fresnocog.org
Subject: Notice of Availability of Draft EA for the FAT Airport Traffic Control Tower Replacement
Date: Monday, June 23, 2025 6:15:53 AM
Attachments: [250622 FAT ATCT Replacement Draft EA NOA v3.0.pdf](#)

Mr. Robert Phipps,

In accordance with the National Environmental Policy Act of 1969 (42 United States Code [USC.] §§ 4321-4335, as amended), Section 106 of the National Historic Preservation Act (54 USC 306108), and Section 4(f) of the Department of Transportation Act (49 USC 303[c]), the FAA and City of Fresno are issuing the Draft Environmental Assessment (EA), Draft Section 106 Memorandum of Agreement and Draft Section 4(f) Evaluation for the proposed Airport Traffic Control Tower (ATCT) Replacement Project at the Fresno Yosemite International Airport (FAT) for a 45-day public and agency comment period. The comment period begins on Sunday, June 22, 2025, and ends on August 6, 2025. Please see the attached Notice of Availability (NOA) for where you can access the Draft EA and instructions on how to provide comments.

Thank you,
Karin Bouler

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Public and Agency Comments and Response to Comments

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H.1 INTRODUCTION

This appendix contains a list of comments submitted on the Draft Environmental Assessment (EA) during the 45-day comment period¹, between June 22 and August 6, 2025, and responses to those comments.

Table H-1 provides a list of commenters grouped by agencies and the public, as applicable. Within the groupings, commenters are organized in alphabetical order.

Section H.2 contains copies of the six comment letters received during the comment period and the responses to those comments. Commenters had the opportunity to provide comments in written and electronic formats. The Federal Aviation Administration (FAA) solicited comments through public notices and accepted comments in writing via U.S. mail or electronically via email. Each written comment is presented as it was received by the FAA and any misspellings have not been corrected. Each written comment is numbered in the margin of the comment submission, and the responses to all comments follow that comment submission.

Table H-1: List of Commenters

| Commenter Number | Name | Affiliation | Date | Submission Type |
|------------------|------------------|--|-----------|-----------------|
| <i>Agencies</i> | | | | |
| A-1 | Ashley Atkinson | City of Fresno Planning and Development / Historic Preservation Commission (HPC) | 7/28/2025 | Electronic |
| A-2 | Julianne Polanco | California State Historic Preservation Officer (SHPO) | 8/19/2025 | Electronic |
| A-3 | Viktoriya Sirova | U.S. Department of the Interior (DOI) | 8/4/2025 | Electronic |
| A-4 | Jacob Torrez | San Joaquin Valley Air Pollution Control District (SJVAPCD) | 8/5/2025 | Electronic |
| <i>Public</i> | | | | |
| P-1 | Brian Stepanek | - | 6/30/2025 | Electronic |
| P-2 | Brian Stepanek | - | 7/9/2025 | Electronic |

¹ The typical review period for a Draft EA is 30 days. However, Section 4(f) requires a 45-day review period for the U.S. Department of the Interior (DOI) and the Official with Jurisdiction (OWJ), which is the California State Historic Preservation Officer (SHPO). As the Section 4(f) evaluation was provided as an appendix, the review period for the Draft EA was also extended to 45 days.

H.2 COMMENTS AND RESPONSE TO COMMENTS ON THE DRAFT EA

Commenter A-1

City of Fresno Planning and Development / Historic Preservation Commission

From: Ashley Atkinson <Ashley.Atkinson@fresno.gov>
Sent: Wednesday, August 6, 2025 5:00 PM
To: Airport Environmental <AirportEnvironmental@fresno.gov>
Cc: Bouler, Karin <Karin.Bouler@rsandh.com>; Jennifer Clark <Jennifer.Clark@fresno.gov>
Subject: [External] comments on the Draft EA for the Airport Traffic Control Tower

External Sender: Please use caution with links and attachments.

At its meeting on Monday, July 28, the City of Fresno Historic Preservation Commission reviewed and commented on the Draft Environmental Assessment for the Airport Traffic Control Tower (ATCT). Their comments are summarized below:

- 1 *The Commissioners took turns voicing their concerns regarding the demolition of the ATCT and associated loss of history. They asked about the alternatives researched and requested an option that does not require complete removal of the tower. A suggestion was made that the tower be considered for use as an aviation museum, citing possible Measure P funds as a funding source. If none of their suggestions were possible, the Commission asked that the ATCT be dismantled and either put together somewhere else, or parts used in the new design. They concluded the discussion on the importance of the tower and its cultural heritage value.*
- 2
- 3

Ashley Atkinson | AICP | Assistant Director
 Planning & Development Department
2600 Fresno Street | Fresno CA 93721
 559.621.8492
Ashley.Atkinson@Fresno.gov



Resources: [Planning & Development](#)

Response to Commenter A-1

1. During the preparation of the Environmental Assessment (EA) and the Section 4(f) Evaluation, multiple alternatives were evaluated to determine if there was an alternative location for the proposed new ATCT and if there was an option other than demolition for the existing ATCT. Section 4(f) of the U.S. DOT Act of 1966, 49 USC 303(c), requires the selection of an alternative that completely avoids the use of Section 4(f) property if that alternative is deemed feasible and prudent. A total of 17 potential site locations for the ATCT were evaluated along with the No Action Alternative as the avoidance alternatives in the Section 4(f) Evaluation. Additionally, under each alternative site location, two options for what would occur with the existing ATCT were evaluated that would avoid demolition. Option A would rehabilitate and preserve the existing ATCT in place as a vacant building at FAT. Option B would rehabilitate the existing ATCT and repurpose it for another use other than an ATCT. Repurposed uses could include publicly accessible uses, such as an aviation museum, or restricted uses, such as office

space for City or Airport employees. The Section 4(f) alternatives analysis included an assessment of the feasibility and prudence of these alternatives. 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. Ultimately, the Section 4(f) alternatives analysis determined that Option A and Option B would not be feasible and prudent because it would impede views from the new ATCT, the cost of repairs and ongoing maintenance would be prohibitive, and it is not consistent with approved Airport plans. Additionally, the Section 4(f) avoidance alternatives evaluation determined that there is no feasible and prudent alternative that would avoid the physical use of the Section 4(f) property (see Chapter 6 in **Appendix E** for additional information).

The EA evaluated six alternatives in addition to the No Action Alternative. With the exception of Alternative 2, each alternative identified in the EA included three options for how the existing ATCT can be treated. These options were: Option A, preserve the ATCT in place; Option B, retain the existing ATCT for other uses, as described above, and Option C, demolish the existing ATCT facility once the new ATCT is fully operational. Alternative 2 included retaining the existing ATCT at its current location and continuing its use as the FAT ATCT. A two-step screening process was used to identify and evaluate a range of reasonable alternatives. In Step 1, each alternative was analyzed to determine whether the alternative could achieve the purpose and need for the Proposed Project. Alternatives that do not meet the criteria in Step 1 were eliminated from further consideration. Alternatives that met the criteria in Step 1 were retained for evaluation in Step 2 of the screening process. In Step 2, each alternative was analyzed to determine whether it would be technically and economically feasible to implement. Alternatives that did not meet the criteria in Step 2 were eliminated from further consideration. Alternatives that were not eliminated in Step 2 of this screening process were retained for a detailed evaluation of their environmental impacts.

Option A and Option B, associated with Alternatives 1, 4, 5, and 6, did not advance beyond Step 2 screening because they would result in the existing ATCT blocking the line of sight from the new ATCT to a portion of Taxiway A. This obstruction would also result in both options not allowing for operational efficiency due to the potential disruption between pilot and Air Traffic Control (ATC) communication. Additionally, Alternative 2 to rehabilitate the existing ATCT for continued use at FAT and Options A and B associated with Alternatives 1, 3, 4, 5, and 6 would result in high costs of repairs to the existing facility in order to preserve the integrity of the building. This would not meet the purpose and need of the Proposed Project. Therefore, Alternative 2 and Options A and B were eliminated from further consideration.

2. As described in the response to Comment #1 above, public use of the existing ATCT, including repurposing the existing ATCT, such as for a museum, was evaluated during preparation of the EA and the Section 4(f) Evaluation. However, it was determined that reuse of the existing ATCT would not be feasible in part because public access poses a security risk to airfield personnel, ATCs, and members of the public. Unauthorized individuals could gain access to the existing ATCT and compromise the safety of the airspace and FAA personnel within the facility. FAA Advisory Circular (AC) 150/5300-

13B, Airport Design, states that, “Part 139² 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.” Additionally, FAA Order 1600.69D, *FAA Facility Security Management Program*, identifies the required security countermeasures that must be in place at FAA facilities. At an ATCT, pedestrian access to the site must be deterred through the use of landscaping, fencing, and other barriers to restrict pedestrian access. FAA Order 1600.69D also requires that countermeasures are in place, such as access-controlled parking, to prohibit unauthorized vehicle access to the site. Additionally, the current ATCT was built in 1961 and, based on the results of the Phase I ESA (see **Appendix F** of the EA), potential safety concerns associated with leaving the existing tower in place include the following:

- Continued possible exposure of employees to lead-based paint. 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.
- Continued possible exposure of employees to Polychlorinated Biphenyls (PCBs). 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.

Therefore, the alternatives that included reuse of the existing ATCT were determined to not meet the purpose and need of the Proposed Project, specifically in regards to FAA safety requirements, and were screened from further review.

3. The ATCT is eligible for the National Register of Historic Places under Criterion C as a highly intact representative example of the International style of architecture as applied to an ATCT and as a good example of the work of master architect Allen Y. Lew, FAIA. The ATCT retains high integrity of location, design, materials, workmanship, feeling, and association. As discussed in the Cultural Resources Assessment (Appendix D of the EA) and Section 3.4.5 of the EA, the existing ATCT is a representative example of the International style of architecture as applied to an ATCT and that part of the high integrity that it retains is due to the location and association of the existing ATCT at FAT. Therefore, relocating the existing ATCT to another location would result in an Adverse Effect to the existing tower due to loss of integrity. As evaluated in the EA, reusing or relocating the existing ATCT is not feasible, however, based on feedback from the HPC, Stipulation 3 in the Section 106 Memorandum of Agreement (MOA) provides interpretive signage located in the airport terminal that will include a narrative historic context, historic photographs, and, if feasible, salvaged architectural elements of the existing ATCT.

² 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.

Commenter A-2
Julianne Polanco
California State Historic Preservation Officer



State of California • Natural Resources Agency

Gavin Newsom, Governor

DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer
 1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
 Telephone: (916) 445-7000 FAX: (916) 445-7053
 calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

August 19, 2025

In reply refer to: FAA_2024_0819_001

VIA Email

Nani Michelle Jacobson
 Environmental Protection Specialist
 Federal Aviation Administration
 2000 Oak Road, Suite 200
 Walnut Creek, CA 94597

Subject: Review of Draft Section 4(f) Evaluation for Airport Traffic Control Tower Replacement, Fresno Yosemite International Airport, Fresno County, California

Dear Ms. Jacobson:

1

The Federal Aviation Administration (FAA) is continuing consultation regarding the above-referenced undertaking. The FAA previously consulted with the State Historic Preservation Officer (SHPO) in September of 2024 and the State Historic Preservation Officer (SHPO) concurred with an Adverse Effect finding for the project on October 24, 2024. The FAA is currently seeking SHPO comments on a *Draft Section 4(f) Evaluation for the Airport Traffic Control Tower, Fresno Yosemite International Airport, Fresno County*. The FAA and the City of Fresno have determined there is no feasible and prudent alternative that would avoid physical use (demolition) of the Fresno Yosemite International Airport Air Traffic Control Tower (ATCT), a property eligible for listing on the National Register of Historic Places (NRHP).

Based on review of the submitted documentation, SHPO agrees that there is no feasible and prudent alternative to physical use of a Section 4(f) property.

If you have any questions, please contact Tristan Tozer at (916) 894-5499 or Tristan.tozer@parks.ca.gov.

Sincerely,

Julianne Polanco
 State Historic Preservation Officer

Response to Commenter A-2

1. Your concurrence with the Section 4(f) determination is acknowledged.

Commenter A-3
Viktoriya Sirova
U.S. Department of the Interior



United States Department of the Interior

OFFICE OF THE SECRETARY
 Office of Environmental Policy and Compliance
 1323 Club Drive
 Vallejo, CA 94592

August 4, 2025

IN REPLY REFER TO:
 ER 25/0320
 4111

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

Subject: U.S. Department of the Interior Comments – DRAFT Section 4(f) Evaluation for the
 Airport Traffic Control Tower, Fresno Yosemite International Airport, Fresno,
 California

Dear Nani Jacobson:

1 The U.S. Department of the Interior (Department), as required by the Department of Transportation Act of 1966 (49 U.S.C. §303 and 23 U.S.C. §138), has reviewed the May 2025 *Draft Section 4(f) Evaluation for the Airport Traffic Control Tower, Fresno Yosemite International Airport, Fresno, California* prepared by the U.S. Department of Transportation Federal Aviation Administration (FAA).

The City of Fresno proposes to construct and operate a replacement Airport Traffic Control Tower (ATCT) at the Fresno Yosemite International Airport (Airport). The existing ATCT facility is proposed to be demolished once a new ATCT facility is fully operational. The existing ATCT is deemed eligible for listing on the National Register of Historic Places (NHR). The FAA and City of Fresno have determined there is no feasible and prudent alternative that would avoid physical use of the NHR-eligible property, and that the proposed project, which includes demolition of the latter, would result in the least overall harm to the historic resource.

The Department, through the National Park Service (NPS), concurs that there is no feasible and prudent alternative to physical use (demolition) of a Section 4(f) property (the existing ATCT).

TRANSMITTED ELECTRONICALLY – NO HARDCOPY TO FOLLOW

This NHR-eligible property lies outside of NPS lands or areas of interest.

If you have specific questions related to our comments, please contact Danette Woo at Danette_Woo@nps.gov. For all other questions, please contact me at Viktoriya_Sirova@ios.doi.gov.

Sincerely,

**VIKTORIY
A SIROVA**
Digitally signed by
VIKTORIYA SIROVA
Date: 2025.08.04
14:58:13 -07'00'
Viktoriya Sirova
Regional Environmental Officer

Electronic distribution: AirportEnvironmental@fresno.gov

cc: Melissa Stedeford, National Park Service: Melissa_Stedeford@nps.gov
Danette Woo, National Park Service: Danette_Woo@nps.gov

Response to Commenter A-3

1. Your concurrence with the Section 4(f) determination is acknowledged.

Commenter A-4
 Jacob Torrez
 San Joaquin Valley Air Pollution Control District



August 5, 2025

Francisco Partida
 City of Fresno
 Airports Department
 4995 East Clinton Way
 Fresno, CA 93727

**Project: Draft Environmental Assessment – Fresno Yosemite Airport (FAT)
 Airport Traffic Control Tower (ATCT) Replacement**

District CEQA Reference No: 20250820

Dear Mr. Partida:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Assessment (EA) from the City of Fresno (City) for the proposed project. Per the EA, the project consists of the demolition of the existing ATCT and construction of a new ATCT 250 feet south of the existing ATCT (Project). The Project is located at the Fresno Yosemite Airport in Fresno, CA.

The District offers the following comments at this time regarding the Project:

1

1) Electric Infrastructure

To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District recommends that the City install electric vehicle chargers at project sites, and at strategic locations.

Please visit <https://ww2.valleyair.org/grants/charge-up> for more information.

Samir Sheikh
 Executive Director/Air Pollution Control Officer

Northern Region
 4800 Enterprise Way
 Modesto, CA 95356-8718
 Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
 1990 E. Gettysburg Avenue
 Fresno, CA 93726-0244
 Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
 34946 Flyover Court
 Bakersfield, CA 93308-9725
 Tel: (661) 392-5500 FAX: (661) 392-5585

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2

2) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations>. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

3

2a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (559) 230-5888.

4

2b) District Rule 9510 - Indirect Source Review (ISR)

The District has reviewed the information provided and determined that there is no construction of a new building, facility, or structure, or reconstruction of a building, facility, or structure for the purpose of increasing capacity or activity. Therefore, the project does not meet the definition of a "Development Project", as defined in District Rule 9510 section 3.13, and District Rule 9510 requirements and related fees do not apply to the Project.

5

2c) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)

The Project will be subject to District Rule 4002 since the Project will include demolition, renovation, and removal of existing structures. To protect the public from uncontrolled emissions of asbestos, this rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Any asbestos present must be handled in accordance with established work practice standards and disposal requirements.

Information on how to comply with District Rule 4002 can be found online at:
<https://ww2.valleyair.org/compliance/demolition-renovation/>.

6

2d) District Rule 4601 (Architectural Coatings)

The Project will be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at:
<https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf>

7

2e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

7

The application for both the Construction Notification and Dust Control Plan can be found online at: <https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx>

Information about District Regulation VIII can be found online at:
<https://ww2.valleyair.org/dustcontrol>

8

2f) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

If you have any questions or require further information, please contact Jacob Torrez by e-mail at Jacob.torrez@valleyair.org or by phone at (559) 230-6558.

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs



For: Daniel Martinez
Program Manager

Response to Commenter A-4

1. The Proposed Project is not a dwelling and will not be publicly accessible, therefore it is not eligible for the Charge Up! Incentive program. However, the City will evaluate opportunities during final design to install electric-charging infrastructure in the parking lot that will be reconstructed for the new ATCT.
2. The City will comply with all current required San Joaquin Valley Air Pollution District's (SJVAPCD) rules, regulations, and permits. The City will coordinate with SJVAPCD prior to construction and operation of the Proposed Project. Applicable permits and approvals were added to Table 2-4 in the EA.
3. The City will comply with SJVAPCD Rule 2010 and Rule 2201 in relation to the Proposed Project. The City would coordinate with SJVAPCD to apply and obtain Authority to Construct (ATC) and Permit to Operate (PTO), as necessary, prior to construction of the Proposed Project. The ATC and PTO were added to Table 2-4 in the EA.
4. The statement that SJVAPCD Rule 9510 does not apply to the Proposed Project is acknowledged.

5. The City will comply with SJVAPCD Rule 4002 as it relates to the Proposed Project. Any asbestos detected would be handled according to applicable local, state, and federal laws and policies.
6. The City will comply with SJVAPCD Rule 4601 regarding architectural coatings in the new ATCT.
7. This City will review and comply with SJVAPCD Regulation VIII and submit a Construction Notification Form and Dust Control Plan, as applicable, prior to construction of the Proposed Project. The form and plan were added to Table 2-4 in the EA.
8. The City will review SJVAPCD Rule 4641, along with other SJVAPCD rules and regulations, and comply with all required rules, regulations, and permits, as applicable.

Commenter P-1

Brain Stepanek

From: Brian S <flyfresno@yahoo.com>
Sent: Monday, June 30, 2025 3:38:02 PM
To: AirportEnvironmental@fresno.gov <AirportEnvironmental@fresno.gov>
Subject: Comments on new control tower

External Email: Use caution with links and attachments

1

Hi,

I am writing to provide public comment about the new control tower at FAT. I am a commercial airline pilot for a major airline that operates at FAT, but am providing comments on behalf of myself, not my employer. I want to make sure that the new control tower will have D-ATIS and CPDLC. With the high topography east of FAT, it's often difficult to receive FAT's ATIS when coming from the east until much closer than is normal at non D-ATIS airports without high terrain. While FAT usually uses 29 L/R, occasionally 11 L/R is used, even when there are not strong winds from the SE, and 29 L/R is sometimes used when there is a small tailwind. D-ATIS would allow pilots to know for sure which direction the airport is landing (as well as receive other important information) much earlier than is currently possible. This would in turn increase safety at FAT as pilots can have plenty of time to set up for the appropriate approach and landing. CPDLC increases safety because it provides a textual clearance, which eliminates mistakes in transmission. As the FAA plans for the new tower, I hope that you include these two features that will greatly increase safety when operating into and out of FAT.

Thank you very much,

Brian Stepanek

Response to Commenter P-1

1. The type of equipment included within the new ATCT is outside the scope of the EA. The City forwarded this comment to the FAA Air Traffic Organization (ATO) for review and consideration during the final design phase of the Proposed Project, which will follow completion of the NEPA process.

Commenter P-2

Brian Stepanek



Re: Comments on new control tower

From Brian S <flyfresno@yahoo.com>
Date Wed 7/9/2025 12:02 PM
To Airport Environmental <AirportEnvironmental@fresno.gov>

External Email: Use caution with links and attachments

1

Hi,

Want to make sure you received these comments (see below)?

On Monday, June 30, 2025 at 05:38:02 PM CDT, Brian S <flyfresno@yahoo.com> wrote:

Hi,

I am writing to provide public comment about the new control tower at FAT. I am a commercial airline pilot for a major airline that operates at FAT, but am providing comments on behalf of myself, not my employer. I want to make sure that the new control tower will have D-ATIS and CPDLC. With the high topography east of FAT, it's often difficult to receive FAT's ATIS when coming from the east until much closer than is normal at non D-ATIS airports without high terrain. While FAT usually uses 29 L/R, occasionally 11 L/R is used, even when there are not strong winds from the SE, and 29 L/R is sometimes used when there is a small tailwind. D-ATIS would allow pilots to know for sure which direction the airport is landing (as well as receive other important information) much earlier than is currently possible. This would in turn increase safety at FAT as pilots can have plenty of time to set up for the appropriate approach and landing. CPDLC increases safety because it provides a textual clearance, which eliminates mistakes in transmission. As the FAA plans for the new tower, I hope that you include these two features that will greatly increase safety when operating into and out of FAT.

Thank you very much,

Brian Stepanek

Response to Commenter P-2

1. The commenter was informed that his comments had been received.