U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WESTERN-PACIFIC REGION

# *FINDING OF NO SIGNIFICANT IMPACT AND RECORD OF DECISION*

**Replacement Airport Traffic Control Tower Project**

**Council on Environmental Quality Identification Number: EAXX-021-12-ARP-1755511841**

Fresno Yosemite International Airport
Fresno, Fresno County, California

For further information

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## GENERAL INFORMATION ABOUT THIS DOCUMENT

**WHAT'S IN THIS DOCUMENT?** This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact and Record of Decision (FONSI/ROD) for the proposed Replacement Airport Traffic Control Tower (ATCT) Project (Project) at Fresno Yosemite International Airport located in Fresno, California. This document includes the agency determinations and approvals for those proposed Federal actions described in the Final Environmental Assessment dated December 2025. This document discusses all alternatives considered by FAA in reaching its decision, summarizes the analysis used to evaluate the alternatives, and briefly summarizes the potential environmental consequences of the Proposed Project and the No Action Alternative, which are evaluated in detail in this FONSI/ROD. This document also identifies the environmentally preferable alternative and the agency-preferred alternative. This document also identifies applicable and required mitigation.

**BACKGROUND.** In June 2025, the City of Fresno (City) issued a Draft Environmental Assessment (Draft EA) under the supervision of the FAA. The Draft EA addressed the potential environmental effects of the proposed ATCT Replacement including various reasonable alternatives to that proposal. The Draft EA was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) [Public Law 91-190, 42 USC 4321-4347], and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures*[i] and 5050.4B, *National Environmental Policy Act (NEPA), Implementing Instructions for Airport Actions*. The City published the Notice of Availability for the Draft EA, the Draft Section 106 Memorandum of Agreement and notice of a Section 4(f) use and associated Section 4(f) evaluation on June 22, 2025. The City received six comment documents comprising 15 bracketed comments during the public comment period held between June 22, 2025 and August 6, 2025. The Final EA became a Federal document when the Responsible FAA Official signed the document on December 30, 2025.

**WHAT SHOULD YOU DO?** Read the FONSI/ROD to understand the actions that FAA intends to take relative to the proposed Replacement ATCT project at Fresno Yosemite International Airport.

**WHAT HAPPENS AFTER THIS?** The City may begin to implement the Proposed Project.

[i] On June 30, 2025, the FAA issued Order 1050.1G, FAA National Environmental Policy Act Implementing Procedures, and rescinded FAA Order 1050.1F, Environmental Impacts: Policies and Procedures. FAA Order 1050.1G provides, "FAA will apply the procedures in this Order to actions initiated on or after the effective date of this Order." Because the environmental analysis and release of the Draft EA for public comment for the Proposed Project was initiated prior to June 30, 2025, this document relies upon FAA Order 1050.1F. Any direction in FAA Order 1050.1F that is inconsistent with Executive Order (EO) 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity, EO 14154, Unleashing American Energy, or the Supreme Court's decision in Seven County Infrastructure Coalition v. Eagle County, 605 U.S. ____ (2025) is superseded and will not be followed. Finally, the Council on Environmental Quality's NEPA regulations have been rescinded and to the extent that references to these regulations remain in FAA Order 1050.1F, they are guidance. (90 FR 10610, February 19, 2025).

**U.S. DEPARTMENT OF TRANSPORTATION**
**FEDERAL AVIATION ADMINISTRATION**
**FINDING OF NO SIGNIFICANT IMPACT**
**AND**
**RECORD OF DECISION**

**PROPOSED REPLACEMENT AIRPORT TRAFFIC CONTROL TOWER PROJECT**
**FRESNO YOSEMITE INTERNATIONAL AIRPORT**
**FRESNO, CALIFORNIA**

## 1. Introduction.

This document is a Finding of No Significant Impact (FONSI) on the environment and Record of Decision (ROD) (FONSI/ROD) for the proposed Replacement Airport Traffic Control Tower (ATCT) at Fresno Yosemite International Airport (FAT), Fresno County, California. The City of Fresno, through its Aviation Department, is the sponsor for FAT. The Federal Aviation Administration (FAA) must comply with the National Environmental Policy Act of 1969 (NEPA) and other applicable statutes before being able to take the proposed federal actions. Pursuant to Section 743 of the Federal Aviation Administration Reauthorization Act of 2024 (Public Law 118-63), Congress limited FAA's approval authority to portions of the Airport Layout Plan (ALP) that meet certain statutorily defined criteria, including those portions necessary for aeronautical purposes. Therefore, FAA approval of the ALP depicting the proposed replacement ATCT is limited to approval of those portions of the ALP that depict the proposed projects within FAA's authority to approve. FAA approval of the ALP is authorized by the Airport and Airway Improvement Act of 1982, as amended (Public Laws 97-248, 100-223, and 118-63).

## 2. Purpose and Need of the Proposed Project.

Section 1.4 of the Final EA describes the purpose and need for the Proposed Project. 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. FAA's purpose and need is that an ATCT facility is established at the Airport that conforms to current FAA design and operation standards ensuring the safe and efficient use of navigable airspace in the United States pursuant to 49 USC § 47101. Below are the purpose and need criteria for replacement of the existing ATCT.

- **Existing ATCT Does Not Meet Current Standards**: The existing ATCT does not meet current FAA space and height requirements as 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, the existing ATCT does not meet current State and local building requirements, including seismic requirements as specified in the California Code of Regulations, Title 24, California Building Code, Section 2, Volume 2, Chapter 16, *Structural Design* and Section 1613, *Earthquake Loads*, and the latest State fire protection requirements as identified in 2022 California Fire Code, Title 24, Part 9. Further, the existing ATCT does not meet current Americans with Disability Act (ADA) requirements.
- **Inadequate Height and Obstructed Line of Sight**: The existing ATCT, at 80 feet in height from the ground to the cab floor, is too low, which poses an obstructed line of sight. As a result of FAT's terminal building expansion project in 2000, the existing

ATCT's southeastward line of sight is partially obstructed due to the increased height of the passenger terminal. The inability for Air Traffic Control (ATC) operators to have direct line of sight of the aircraft apron located immediately east of the terminal creates potential risks, including aircraft incursions and delayed ATC pilot instructions. Additionally, FAT experiences wrong surface landings on Runways 29R and 29L due to closely spaced runways, parallel taxiways, and Runway 29L being displaced 312 feet to provide the FAA-required separation from Clovis Avenue. ATCs are the last line of control prior to pilots landing on the wrong runway; however, the angle and height of the existing ATCT cause a parallax issue for ATCs looking at Runways 29R and 29L that does not allow them to determine if a pilot is lined up to land on the correct runway.

- **Operational Inefficiencies**: As a result of the partial obstruction of the aircraft apron immediately east of the terminal, communication with aircraft on that apron can be impeded. Due to the delay in communication with the ATCT, aircraft dwell times operating on this apron have increased.
- **Escalating Maintenance Costs**: The existing ATCT facility has reached a point where its maintenance costs are increasing significantly, and the City estimates that the ATCT needs $10 million in improvements and upgrades (City of Fresno, 2019). Aging infrastructure, equipment and systems require frequent repairs and updates. For example, the elevator in the building frequently breaks down requiring custom order parts that can have long lead times and high costs due to parts being discontinued. Additionally, the frequent breakdown of the elevator causes accessibility issues for the employees and affects staffing levels when employees cannot access the cab at the top of the ATCT. Other mechanical and electrical systems, such as the HVAC and boiler system, have exceeded their service life and require constant maintenance to remain in service. This results in disruptions to facility operations and additional high costs for emergency repairs.
- **Security Deficiencies**: The parking area around the existing ATCT facility is not adequately secured. This poses a security risk, and ATC operators have reported a breach into the existing ATCT within the last decade and numerous other attempts. 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 1399 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.

## 3. Proposed Project and Federal Action.

Section 1.3 of the Final EA provides a description of the Proposed Project evaluated in this FONSI/ROD, which includes the following major project 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 Proposed Project will be constructed in four stages over a period of two years. The stages are ATCT facility site preparation, ATCT facility construction, existing ATCT facility demolition, and parking lot reconstruction.

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 rotating beacon and antennae atop the cab.

The new ATCT facility would meet the design policy described in FAA Job Order 6480.7E, *ATCT and TRACON Design Policy*. The base building would include administrative offices and operational and storage spaces. 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. The cab would be approximately 440 square feet 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.

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.

Install New Equipment and Utility Services:

The Proposed Project would install new equipment in the new ATCT such as navigation and management systems, communications equipment, and electrical panels. New utility services would also be connected to the new 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 building to the proposed new ATCT facility.

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 new ATCT facility and the adjacent parking lot. A portion of existing fence that connects to the existing ATCT would be removed. The new ATCT would also include gate-controlled access to the parking lot and site.

FAA Actions:

FAA will take the following actions to authorize implementation of the Proposed Project:

- Unconditional approval of portions of the ALP that depict those components of the Proposed Project subject to FAA review and approval pursuant to 49 USC § 47107(a)(16).
- Determinations under 49 USC § 47115 that are associated with the eligibility of the Proposed Project for federal funding under the Infrastructure Investment and Jobs Act (IIJA) Airport Terminal Program (ATP) grant program and Airport Improvement Program (AIP) discretionary grants.

**4. Reasonable Alternatives Considered.**

Chapter 2 of the Final EA describes a two-step alternatives analysis screening process for the Proposed Project. Alternatives that met the criteria in Step 1 were retained for evaluation in Step 2 of the screening process. Alternatives that were not eliminated in Step 2 of this screening process were retained for a detailed evaluation of their environmental impacts in **Chapter 4.** This FONSI/ROD summarizes the screening process:

Step 1 – Does the Alternative Meet the Purpose and Need?

1) Does the alternative meet current standards, including FAA space and height requirements, State and local building standards, including seismic and fire requirements, and ADA requirements?
2) Does the alternative provide adequate height and unobstructed lines of sight to the aircraft apron, runways, and taxiways for ATC operators?
3) Does the alternative allow for operational efficiency through the ability for clear communication between pilots and the ATCT?
4) Does the alternative not result in high costs of repairs and disruptions to facility operations due to frequent repairs and emergency maintenance?
5) Is the alternative secure from unauthorized access as required under FAA Order 1600.69D?

Step 2 – Is the Alternative Technically and Economically Feasible to Implement?

1) Technically Feasible: This screening criteria includes the identification of a material effect on airfield operations, including ATC operations, using federal advisory circulars,

orders, regulations, and design guidelines to determine whether an alternative would be technically feasible to implement. Additionally, an alternative that would not introduce potential conflicts or hazards is considered to be more viable than an alternative that would.
2) Economically Feasible: This screening criteria includes whether the alternative would be economically feasible to implement. If the alternative would not be reasonable to construct, the alternative would not be economically feasible to implement. “Reasonable to construct” is defined as an alternative that could be implemented using sound engineering judgement, with costs that would not be disproportionately greater than the costs of other alternatives.

Section 2.3 of the Final EA describes the range of alternatives analyzed under the screening process. Six potential project alternatives and the No Action Alternative were analyzed under Step 1. With the exception of Alternative 2, each alternative includes three options on how the existing ATCT can be treated. These options are (A) preserve the existing ATCT in place, (B) retain the existing ATCT for other uses and (C) demolish the existing ATCT.

Section 2.4 of the Final EA provides the evaluation of seven potential project alternatives. Alternatives 1, 3 and 4, all with Option C, met the purpose and need of the Proposed Project and were advanced to the Step 2 screening process. The No Action Alternative failed to meet the purpose and need for the Proposed Project, however, the No Action Alternative was carried forward in the assessment of environmental impacts as required by FAA Order 1050.1F. Table 2-1 in the Final EA summarizes the results of the Step 1 alternatives screening process.

Alternative 1 passed Step 2 of the alternatives screening process. Alternative 3 was determined to not be economically feasible to implement, and Alternative 4 was determined to not be technically feasible to implement. Therefore, Alternative 1 and the No Action Alternative were analyzed in the Environmental Consequences chapter of the Final EA for detailed impact analysis. Table 2-2 in the Final EA summarizes the results of the Step 2 alternatives screening process.

**5. Environmental Consequences.**

Chapter 4 of the Final EA identifies and evaluates the potential environmental impacts and avoidance, minimization and mitigation measures for the Proposed Project and No Action Alternative. The FAA reviewed the Final EA and determined that it adequately describes the potential impacts of the Proposed Project. No new issues surfaced as a result of the public review.

The Final EA analyzed the following environmental impact categories for the project completion year (2029) and five years after project completion (2034): Air Quality; Climate; Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund, Section 6(f); Hazardous Materials, Solid Waste and Pollution Prevention; Historical, Architectural, Archaeological, and Cultural Resources; Land Use; Natural Resources and Energy Supply; Noise and Noise-Compatible Land Use; and Visual Effects.

The Final EA discloses that the Proposed Project would not have the potential to affect the following resource categories, and therefore these were not evaluated: Biological

Resources; Coastal Resources; Farmlands; Socioeconomics and Children's Environmental Health; and Water Resources.

**A. Air Quality.**

Section 4.2 of the Final EA provides analysis of air quality for the No Action Alternative and the Proposed Project. Section 4.2.1 of the Final EA states FAT is designated as nonattainment for $O_3$, $PM_{10}$ and $PM_{2.5}$ and attainment for CO, $NO_2$, $SO_2$, and Pb. An action would cause a significant air quality impact if pollutant concentrations would exceed one or more of the National Ambient Air Quality Standards (NAAQS) established by U.S. Environmental Protection Agency (USEPA) under the Clean Air Act (CAA) for any of the time periods analyzed or would increase the frequency or severity of any such existing violations. The CAA requires that all Federal actions conform to a State Implementation Plan (SIP). Conformity is defined as demonstrating that an action conforms to the SIP and does not cause or contribute to any new violation of the NAAQS. A General Conformity Determination for the Proposed Project is required if the total direct and indirect pollutant emissions resulting from a Proposed Project are above *de minimis* emissions threshold levels specified in the General Conformity Regulations.

Section 4.2.3.1 of the Final EA states that under the No Action Alternative, construction of the Proposed Project would not occur and there would be no changes to aircraft operations, therefore there would be no new air quality impacts. Section 4.2.3.2 of the Final EA provides the construction and operational analysis for air quality for the Proposed Project. The Proposed Project will not increase landside or airside capacity at the airport when related to the No Action Alternative. Therefore, no changes to aircraft operational emissions associated with the implementation of the Proposed Project would occur. Table 4-2 in the Final EA summarizes the total annual construction emissions in tons per year per the NAAQS and San Joaquin Valley Air Pollution Control District (SJVAPCD) for the Proposed Project. This table shows that *de minimis* thresholds are not exceeded for the various criteria pollutants for the construction years of 2027 and 2028. Thus, the Proposed Project emissions would not cause or contribute to an exceedance of the NAAQS or SJVAPCD thresholds and the Proposed Project emissions would not cause or contribute to an exceedance of the NAAQS or delay timely attainment of the NAAQS. Since the Proposed Project for both construction and operations do not exceed *de minimis* thresholds, the project is presumed to conform to the SIP, and no General Conformity Determination was required for this Proposed Project. Further, indirect beneficial impacts to air quality may result because the new ATCT would be more energy efficient and produce less emissions than the existing ATCT via new construction techniques, better insulation of the structure, more efficient windows, and new generation stationary sources.

Section 4.2.4 of the Final EA states that the Proposed Project would not cause significant impacts to air quality when compared to the No Action alternative, therefore no avoidance, minimization, or mitigation measures are required. However, this section includes minimization measures the City will implement to control dust and emissions to further minimize air emissions.

In response to the San Joaquin Valley Air Pollution Control District comments, Table 2-4 was updated with the following permits to be obtained by the City:

- Authority to Construct

- Construction Notification Form and Dust Control Plan
- Permit to Operate

**B. Climate.**

Section 4.3 of the Final EA provides analysis of climate for the No Action Alternative and the Proposed Project. Section 4.3.1 of the Final EA states there are no established significance thresholds for aviation-related Green House Gas (GHG) emissions. FAA Order 1050.1F does not identify specific factors to consider in making a significance determination for GHG emissions. Section 4.3.2 of the Final EA states evaluation of the Proposed Project's climate impacts are consistent with the air quality analysis.

Section 4.3.3.1 of the Final EA states that under the No Action Alternative, construction of the Proposed Project would not occur and there would be no changes to existing ATCT emissions, therefore there would be no new impacts to climate. Section 4.3.3.2 of the Final EA provides the construction and operational impacts on the climate for the Proposed Project. Table 4-3 of the Final EA discloses that GHG emissions are estimated to be from 179 to 375 metric tons of carbon dioxide equivalent (mtCO2e) per year during the 2-year construction period. The Proposed Project would be constructed with energy-efficient and modern building materials and equipment. This would result in the new ATCT using less energy and, therefore, emitting less GHG emissions compared to the No Action Alternative.

The Final EA concludes that construction and operation of the Proposed Project would not have a significant impact on climate, therefore no avoidance, minimization or mitigation measures are required.

**C. Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund, Section 6(f) Resources**

Section 4.4 of the Final EA provides analysis of Section 4(f) resources for the No Action Alternative and the Proposed Project. Section 4.4.1 of the Final EA provides the FAA's significance threshold for Section 4(f), which states that a significant impact would occur if "the action involves more than a minimal physical use of a Section 4(f) resource or constitutes a 'constructive use' based on an FAA determination that the aviation project would substantially impair the Section 4(f) resource." Section 4.4.2 of the Final EA states a Section 4(f) Evaluation was completed for the use of a Section 4(f) resource. Appendix E of the Final EA provides the Section 4(f) Evaluation. The evaluation included the following:

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

Section 4.4.3 of the Final EA identifies the existing ATCT as a historic property eligible for listing on the National Register of Historic Places (NRHP). In September 2024, the FAA determined that the proposed demolition of this historic resource would result in an adverse effect on the resource (see Appendix D in the Final EA). Section 4.4.4 states, under the No Action Alternative, there would be no physical or constructive use of a DOT Section 4(f) resource. This section also states that 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, constituting a physical use of a Section 4(f) resource.

Section 4.4.9 of the Final EA discloses the FAA's Section 4(f) determination 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 was completed through the Proposed Project's Section 106 process through the execution of a Section 106 Memorandum of Agreement (MOA). 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, as described in Section 4.4.7 of the Final EA and Chapter 6 of the Section 4(f) Evaluation (see Appendix E of the Final EA).

During the comment period, the U.S. Department of Interior (DOI) Office of Environmental Policy and Compliance and the California State Historic Preservation Officer (SHPO) submitted letters concurring with the finding in the Section 4(f) Evaluation that there is no feasible and prudent alternative to the physical use (demolition) of the existing ATCT, a Section 4(f) property (see **Appendix E** and **Appendix H**).

Section 3.4.3 of the Final EA states there are no Section 6(f) resources that have received funding from the Land and Water Conservation Fund (LWCF) Act within the Project Study Area. Therefore, the Proposed Project would not affect any LWCF Section 6(f) resources.

**D. Hazardous Materials, Solid Waste, and Pollution Prevention.**

Section 4.5 of the Final EA provides analysis of hazardous materials, solid waste, and pollution prevention for the No Action Alternative and the Proposed Project. Section 4.5.1 of the Final EA states there are no established significance thresholds for hazardous materials, solid waste, and pollution prevention. As discussed in Section 3.4.4, there is potential past contamination at the Proposed Project site associated with prior uses including agriculture, aircraft operations and rental car facilities. These activities are associated with contaminants such as petroleum products, arsenate, pesticides, herbicides, and VOCs. This section also discloses that asbestos-containing wastes were removed from the existing ATCT, and it could also contain lead-based paint (LBP) and polychlorinated bipheyls (PCBs). Additionally, per- and polyfluoroalkyl substances (PFAS) could be located in shallow soils associated with the adjacent ARFF facility.

Section 4.5.3.1 of the Final EA states under the No Action Alternative, no construction of any of the new facilities or improvements planned under the Proposed Project would occur. Thus, no significant impacts to hazardous materials, solid waste or pollution prevention would occur. Section 4.5.3.2 of the Final EA states construction activities for the Proposed Project would use lubricants and fuels

for the operation of construction equipment. Construction activities would also disturb soils and demolish the existing ATCT, both of which may contain hazardous materials. Operation of the Proposed Project would provide benefits of eliminating staff exposure to LBP and PCBs potentially located in the existing ATCT.

To avoid, minimize and mitigate hazardous materials impacts, Section 4.5.4 of the Final EA states that all work will be conducted in compliance with the State's NPDES permit and Airport's SWPPP and BMPs. This section also identifies measures to avoid, minimize and mitigate potential impacts from hazardous materials, as follows:

1) Conduct a pre-demolition survey
2) Conduct a limited soil investigation
3) Develop plans to protect human health and the environment from use, handling and storage of hazardous materials prior to construction:
    - Hazardous Materials Management Plan: describes the proper use, handling, and storage practices and procedures for hazardous materials management
    - Spill Prevention Control and Countermeasures Plan: details how project storage facilities for petroleum products would be constructed, operated, and maintained.
    - Site Management Plan: provides guidelines to protect human health during grading and construction activities will be prepared.
    - Hazardous Materials Contingency Plan: addresses potential contamination in soil, soil vapor, and groundwater from releases on or near the Proposed Project, as well as the potential for existing hazardous materials on site (e.g., drums and tanks).
    - Health and Safety Plan: outlines measures to protect construction workers and the public from exposure to hazardous materials during demolition and construction activities.
4) Ensure proper removal, handling, storage, transport, treatment and disposal of hazardous materials.
5) Conduct worker hazardous materials training.

**E. Historic, Architectural, Archaeological, and Cultural Resources.**

Section 4.6 of the Final EA provides analysis of historical, architectural, archaeological, and cultural resources for the No Action Alternative and the Proposed Project. Section 4.6.1 of the Final EA states FAA is required to consider impacts of any action that would result in a finding of Adverse Effect to Historic Properties. As documented in Section 4.6.2 of the Final EA, the FAA delineated an Area of Potential Effect (APE) for the proposed undertaking and determined that the existing ATCT is eligible for inclusion on the National Register of Historic Places (NRHP) and the Proposed Project would have an adverse effect on the historic property. In July and August 2024, FAA consulted with 11 federal and non-federal tribes and the California SHPO on the proposed APE. The California SHPO concurred with the APE by letter dated September 10, 2024 (see Appendix D to the Final EA). One response was received from the Amah Mutsun Tribal Band stating the proposed project is outside of the tribe's traditional territory and they have no comments. No other comments from Native American Tribes have been received by FAA for the proposed undertaking.

Section 4.6.3.1 of the Final EA states that under the No Action Alternative, no construction of any of the new facilities or planned improvements would occur. Thus, the No Action Alternative would not adversely affect any properties listed or eligible

for listing on the NRHP. Section 4.6.3.2 of the Final EA discloses the FAA's Finding of Adverse Effect based on the eligibility of the existing ATCT for the NRHP and because the Proposed Project would result in the demolition of the NRHP-eligible existing ATCT. In August 2024, FAA provided the Finding of Adverse Effect to the California SHPO. The California SHPO concurred with the FAA's determination on October 24, 2024.

In coordination with the California SHPO and other consulting parties, the FAA developed a Section 106 MOA to resolve the proposed undertaking's adverse effect, including agreed upon mitigation to resolve the undertaking's adverse effect under Section 106. In December 2024, FAA initiated consultation with the following consulting parties: City of Fresno Historic Preservation Commission (HPC) and Fresno County Historical Society (FCHS). FAA included the Draft Section 106 MOA for review and comment by the consulting parties as part of this consultation. The HPC provided comments on the Draft Section 106 MOA related to the demolition and historical context of the ATCT and mitigation measures. The City of Fresno Planning & Development Department requested to be included as a consulting party. Additionally, the FAA notified the ACHP of the determination of adverse effect and intention to enter into a Section 106 MOA, and the ACHP chose not to participate in the consultation.

In January 2025, FAA provided the Draft Section 106 MOA to the California SHPO for review and comment. In March 2025, the California SHPO provided comments on the Draft Section 106 MOA related to signatories and the duration of the MOA, as well as several administrative revisions. In May 2025, FAA continued tribal consultation by providing the Finding of Adverse Effect on the existing ATCT and the Draft Section 106 MOA for review. No comments from Native American Tribes were received by FAA. Refer to Appendix D of the Final EA for consultation letters and responses.

During the NEPA public comment period, the City of Fresno Planning and Development and HPC provided comments on the Draft EA related to the demolition of the ATCT. The specific responses to these comments are provided in Appendix H to the Final EA. Following the comment period for the Draft EA and Draft Section 106 MOA, the Final Section 106 MOA was circulated for signatures by the FAA, California SHPO, and consulting parties. The FAA and California SHPO executed the MOA on December 12, 2025. On December 30, 2025, the ACHP acknowledged receipt of the executed Section 106 MOA (see Appendix D to the Final EA).

Section 4.6.4 of the Final EA provides the following mitigation measures included in the Section 106 MOA that will be implemented by the City and the consulting parties:

- Measure 1: Prepare documentation of the existing ATCT to meet modified Historic American Building Survey (HABS) Level II-like standards. Submit the HABS documentation to SHPO, the FCHS, and the Fresno County Public Library.
- Measure 2: Prepare and provide educational information to the public regarding the existing ATCT in the form of interpretive signage to be placed within the Airport terminal building. The interpretive sign will include a narrative historic context, historic photographs, and, if feasible, salvaged architectural elements of the existing ATCT.
- Measure 3: Prepare and provide educational information to the public regarding the existing ATCT in the form of an exhibit at an FCHS building and electronically

provided education materials to the FCHS. The exhibit and materials will focus on the history and importance of the ATCT as an International style building designed by the prominent architect, Allen Y. Lew. The exhibit and materials will include narrative historic context and historic photographs.

- Measure 4: Prepare a historic context for posting on the City website that discusses the development of the existing ATCT and the background and importance of the architect who designed the ATCT.

Due to prior disturbance within the APE where construction of the Proposed Project would occur, archaeological resources are unlikely to be present. However, in the event of an unanticipated discovery of previously unidentified archaeological resources, the City will halt activities in the vicinity of the resource and notify the FAA. The FAA shall comply with 36 CFR 800.13(b) by notifying the SHPO and inviting comments from signatories to the MOA. In the case of prehistoric or historic Native American sites, the FAA shall notify appropriate state and federally recognized tribal leaders. The agency's notifications will include a description of unanticipated effects, an eligibility recommendation or a proposed schedule for assessing eligibility, and, if appropriate, a process to resolve potential adverse effects. Appendix D of the Final EA includes correspondence with the California SHPO, tribes and consulting parties and the executed Section 106 MOA.

**F. Land Use.**

Section 4.7 of the Final EA provides analysis of impacts to land use for the No Action Alternative and the Proposed Project. Section 4.7.1 of the Final EA states there are no established significance thresholds for land use impacts, rather these are dependent on the significance of other impacts. Section 4.7.2 of the Final EA states the City of Fresno General Plan and Airport Master Plan were reviewed to determine consistency with the Proposed Project and No Action Alternative.

Section 4.7.3.1 of the Final EA states under the No Action Alternative, construction of the proposed new facilities or improvements would not occur. Therefore, no changes to the ALP and local zoning would occur. Section 4.7.3.2 of the Final EA states that the Proposed Project would not result in a land use change and is consistent with City land use designations and Airport Master Plan.

Section 4.7.4 of the Final EA states that since construction and implementation of the Proposed Project would not result in changes to or effect on land use, no avoidance, minimization or mitigation measures are required.

**G. Natural Resources and Energy Supply.**

Section 4.8 of the Final EA provides analysis of natural resources and energy supply for the No Action Alternative and the Proposed Project. Section 4.8.1 of the Final EA states there are no established significance thresholds for natural resources and energy supply. Section 4.8.2 of the Final EA states evaluation of the Proposed Project's impact on the use of natural resources and energy supplies are evaluated in terms of construction activity and building efficiency.

Section 4.8.3.1 of the Final EA states that under the No Action Alternative these resources would only be used for general maintenance purposes and operation of the existing ATCT and would have no new impacts. Section 4.8.3.2 of the Final EA

states construction of the Proposed Project would use natural resources including soil, oil and water. On and off-road equipment and vehicles would consume energy, primarily fossil fuels, however energy consumption would not exceed market supplies and are localized to the project site. The new ATCT facility will be more energy efficient and use few natural resources than the existing ATCT due to using energy-efficient materials, construction practices and equipment. The Proposed Project would have no significant impact on natural resources and energy supply.

Section 4.8.4 of the Final EA states the City will ensure conformance with the following measures:

- Constructed using energy-efficient and modern building materials and construction practices
- Installation of new equipment in accordance with California Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608).
- Meet CALGreen requirements (CCR, Title 24, part 11), which includes mandatory measures for nonresidential development in a variety of categories (e.g., materials conservation and resource efficiency).
- Comply with CCR, Title 24, Part 6 building regulations, including: compliance with American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) 90.1 national standards; efficiency requirements for elevators and digital controls; and energy efficiency measures pertaining to building envelopes, mechanical systems, lighting (indoor, outdoor, and signage), electrical power distribution, and solar readiness.
- Conform to the standards of FAA Order 1053.1C, *Energy and Water Management Program for FAA Buildings and Facilities* (FAA, 2017), which establishes energy conservation standards for airport buildings and facilities.

**H. Noise and Noise-Compatible Land Use.**

Section 4.9 of the Final EA provides analysis of impacts on noise sensitive areas for the No Action Alternative and the Proposed Project. Section 4.9.1 of the Final EA states “a significant noise impact would occur if the action would increase noise by DNL 1.5 dB or more for a noise-sensitive area that is [already] exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.” Section 4.9.2 of the Final EA states that neither the No Action Alternative nor the Proposed Project would result in any changes to aircraft operations, runway configuration, arrival/departures procedures, or runway use percentages. Therefore, there would be no change in aircraft noise exposure, and an aircraft noise analysis is not required. FHWA’s Roadway Construction Noise Model (RCNM) methodologies were used to assess construction noise.

Section 4.9.3.1 of the Final EA states, under the No Action Alternative, the Proposed Project would not be constructed, and regular maintenance and repairs would not result in any perceptible noise changes, nor impacts on noise sensitive areas. Section 4.9.3.2 of the Final EA states construction of the Proposed Project would generate temporary increased noise during construction activities such as demolition, construction, use of generators, and construction vehicle operations. Due to the distance from the closest sensitive noise receptor, the noise level would not likely be

perceptible over typical ambient noise levels of aircraft operations at the FAT, and the impact on noise levels from construction of the Proposed Project would not be significant. Section 4.9.3.2 of the Final EA states the City of Fresno Municipal Code, Section 10-109 provides for the issuance of a permit to exempt construction work completely if an application to do so is approved.

Section 4.9.4 states that since the Proposed Project would not result in significant impacts, no avoidance, minimization or mitigation measures are required.

**I. Visual Effects.**

Section 4.10 of the Final EA provides analysis of impacts on visual resources from the No Action Alternative and the Proposed Project. Sections 4.10.1 and 4.10.2 of the Final EA state that the FAA has not established thresholds to determine the significance of light emissions and visual resources in FAA Order 1050.1F. The methodology for analysis of visual effects identifies existing resources, then analyzes the extent to which the No Action Alternative and Proposed Project would interfere with these resources.

Sections 4.10.1.3 and 4.10.2.3 of the Final EA state under the No Action Alternative, no construction or operation activities would impact light-sensitive land uses, visual resources or visual character. For the Proposed Project, new light sources would include outside lighting for safety and security and lighting the parking facility. The new ATCT would result in a change to the visual character of the Airport, however, because an ATCT has been present within the study area, construction of a new, taller ATCT in a slightly different location would result in minimal, if any, impacts to visual resources. Therefore, the Proposed Project would not result in a viewshed change for residents or communities off-Airport property.

Sections 4.10.1.4 and 4.10.2.4 state that since the Proposed Project would not result in impacts from light emissions or impacts to the visual resources or visual character of the area, no avoidance, minimization or mitigation measures are required.

**6. Environmentally Preferable Alternative and FAA Preferred Alternative.**

In connection with its decision to approve the proposed ALP revisions, the FAA considered the environmental impacts from the Proposed Project (Alternative 1, Site X2, Option C) and the No Action Alternative. Based on the analysis of environmental impacts in the Final EA, the No Action Alternative has fewer environmental effects than the Proposed Project and thus would be the environmentally preferred alternative. In addition to identifying the environmentally preferred alternative, the FAA also identifies the FAA preferred alternative. In selecting the agency's preferred alternative, the FAA considers a variety of factors, including the ability of the alternatives to satisfy the purpose and need of the project and environmental impacts of the alternatives examined in the EA. The No Action Alternative does not meet the purpose and need for the Proposed Project, whereas the Proposed Project fully satisfies the purpose and need. Furthermore, after mitigation, there are no significant impacts associated with the Proposed Project. Finally, the Proposed Project would be more energy efficient and produce less air emissions, and it may reduce ATCT staff exposure to hazardous materials located in the existing ATCT.

Thus, the FAA's preferred alternative is the Proposed Project as defined in the Final EA and this FONSI/ROD. FAA selected this alternative because it meets the purpose and

need of the Proposed Project, with various mitigation measures resulting in no significant adverse environmental effects.

**7. Public Participation.**

The City issued a Notice of Availability (NOA) for the Draft EA, Draft Section 106 MOA and Draft Section 4(f) Evaluation on June 22, 2025. The City published the NOA in the *Fresno Bee*, the local newspaper in the vicinity of the airport. The Draft EA was available on the City 's Planning web site at: Plans & Projects Under Review – City of Fresno and the Airport's website at: Statistics - Fresno Yosemite International Airport | FAT | Fresno, CA. The Draft EA was also available for review at the local library, the Administrative Building at FAT and FAA's Airports District Office in Walnut Creek, California. The newspaper Affidavit of Publication of the Draft EA are included in Appendix H of the Final EA. The Draft EA was available for review and comment by the public, government agencies, and interested parties until the close of the comment period on August 6, 2025, for a total of 45 days. The NOA was also sent to Federal and non-federal tribes, Section 106 consulting parties and the DOI.

The City received a total of six comments comprising 15 bracketed comments. The submittals and responses to these comments are presented in Appendix H. No issues were raised in these comments that resulted in a change in a determination of effects.

**8. Inter-agency Coordination.**

In accordance with 49 USC § 47101(h), the FAA coordinated with the DOI regarding the use of a Section 4(f) property. During the comment period for the Draft EA, the DOI concurred with FAA's determination that there is no feasible and prudent alternative to physical use (demolition) of a Section 4(f) property (the existing ATCT). The FAA determined no further coordination with the USEPA is necessary because the Proposed Project does not involve construction of a new airport, new runway or major runway extension that has a significant impact on natural resources including fish and wildlife; natural, scenic, and recreational assets; water and air quality; or another factor affecting the environment.

**9. Reasons for the Determination that the Proposed Project will have No Significant Impacts.**

The attached Final EA examines each of the various environmental resources that were determined to be present at the project location or had the potential to be impacted by the Proposed Project. The proposed Replacement ATCT Project at FAT would not cause any environmental impacts which, after mitigation, would exceed any thresholds of significance as defined by FAA Orders 1050.1F and 5050.4B. Based on the information contained in the Final EA, the FAA determined that the Proposed Project meets the purpose and need for the proposed project, would not cause any significant environmental impacts that cannot be mitigated, and is the most reasonable, feasible and prudent alternative. The FAA decided to approve the Proposed Project as it is described in Section 3 of this FONSI/ROD, and inclusive of the mitigation measures identified in Section 5.

## 10. Agency Findings and Determinations.

The FAA makes the following findings and determinations for this project based on information and analysis set forth in the Final EA and other portions of the administrative record.

**a.** Independent and Objective Evaluation. The FAA independently and objectively evaluated this Proposed Project. As described in the Final EA, the Proposed Project and the No Action Alternative were studied extensively to determine the potential impacts and appropriate mitigation measures for those impacts. The FAA provided input, advice, and expertise throughout the analysis, along with administrative and legal review of the project.

**b.** Air Quality. FAT is located in Fresno County, California. This air basin is classified by the USEPA as a non-attainment area for $O_3$, $PM_{10}$ and $PM_{2.5}$. As shown in Table 4-2, construction emissions in 2027and 2028 would be below *de minimis* thresholds. Airport operational emissions will not change since there would be no change in the number and type of aircraft operating at FAT resulting from the Proposed Project. Since emissions are less than *de minimis*, a general conformity determination is not required, and implementation of the Proposed Project will not have a significant impact on air quality.

**c.** Department of Transportation Act, Section 4(f). Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966, 49 U.S.C. §303(c), is a federal law that protects publicly owned parks, recreation areas, wildlife and/or waterfowl refuges, as well as significant historic sites, whether publicly or privately owned. Section 4(f) requirements apply to all transportation projects that require funding or other approvals by the USDOT. As a USDOT agency, FAA must comply with Section 4(f). FAA cannot approve a transportation project that uses a Section 4(f) property unless FAA determines that there is no feasible and prudent avoidance alternative to the use of land from the Section 4(f) property, and the action includes all possible planning to minimize harm to the property resulting from such use.

The FAA determined that the demolition of the existing ATCT as part of the Proposed Project would result in an adverse effect to a historic site, constituting a physical use of a Section 4(f) property. FAA determined that there is no feasible and prudent alternative to the physical use of the Section 4(f) property and all possible planning to minimize harm was completed through the Proposed Project's Section 106 process through the execution of a Section 106 MOA.

The Final Section 4(f) Evaluation is included in Appendix E and summarized in Section 4.4 of the Final EA. The measures to minimize harm to Section 4(f) resources are included in Section 4.4.6 of the Final EA and Stipulations found in the Section 106 MOA in Attachment D. Accordingly, FAA finds that the Project meets the requirements of Section 4(f).

**d**. National Historic Preservation Act. FAA determined the existing ATCT is a historic property eligible for listing on the National Register of Historic Places. Further, FAA finds demolition of the historic property, as part of the Proposed Project, will adversely affect this historic property. FAA conducted the required consultation with the California State Historic Preservation Officer and consulting parties, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. The

Project's measures to resolve adverse effects, including mitigation measures, are specified in the Project's Section 106 MOA (see Appendix D of the Final EA). FAA, in coordination with the City, will ensure stipulations in the Section 106 MOA are carried out during the Project's implementation.

FAA finds that the Project has satisfied the requirements of Section 106 of the National Historic Preservation Act.

**11. Decision and Orders.**

Based on the information in this FONSI/ROD and supported by detailed discussion in the Final EA, the FAA has selected the Proposed Project as the FAA's Preferred Alternative. The FAA must select one of the following choices:

- Approve agency actions necessary to implement the Proposed Project, or
- Disapprove agency actions to implement the Proposed Project.

Approval signifies that applicable federal requirements relating to the proposed airport development and planning have been met. Approval permits the City of Fresno Aviation Department to proceed with implementation of the Proposed Project and associated mitigation measures. Disapproval would prevent the City of Fresno Aviation Department from implementing the Proposed Project within FAT.

Under the authority delegated to me by the Administrator of the Federal Aviation Administration, I find that the project is reasonably supported. I, therefore, direct that action be taken to carry out the agency actions discussed more fully in Section 3 of this FONSI/ROD:

- Unconditional approval of the ALP to depict the proposed improvements subject to FAA approval pursuant to 49 U.S.C. 47107(a)(16).
- Determinations under 49 USC § 47115 that are associated with the eligibility of the Proposed Project for federal funding under the IIJA ATP grant program and AIP discretionary grants.

As a condition of approval of this FONSI/ROD, the Fresno County Department of Airports shall implement all the mitigation measures identified in the various subsections entitled *Avoidance, Minimization, and Mitigation Measures* in the Final EA.

This order is issued under applicable statutory authorities, including 49 USC §§ 40101(d), 40103(b), 40113(a), 44701, 44706, 44718(b), and 47101 et seq.

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information, I find the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and other applicable requirements. I also find the proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to section 102(2)(C) of NEPA. As a result, FAA will not prepare an Environmental Impact Statement for this action.

**APPROVED:**

AMY LEANDRA CHOI

Digitally signed by AMY LEANDRA CHOI
Date: 2026.01.05 09:44:59 -08'00'

Amy L. Choi — Date

Manager, San Francisco Airports District Office
Western-Pacific Region, SFO-600

**DISAPPROVED:**

Amy L. Choi — Date

Manager, San Francisco Airports District Office
Western-Pacific Region, SFO-600

*RIGHT OF APPEAL*

*This FONSI/ROD constitutes a final order of the FAA Administrator and is subject to exclusive judicial review under 49 U.S.C. § 46110 by the U.S. Circuit Court of Appeals for the District of Columbia or the U.S. Circuit Court of Appeals for the circuit in which the person contesting the decision resides or has its principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.*