Draft Supplemental Environmental Assessment for the Construction of a New Airport Traffic Control Tower and Base Building at Sacramento International Airport

Sacramento, California
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ACRONYMS AND ABBREVIATIONS

ACHP.....Advisory Council on Historic Preservation
ACM.....Asbestos Containing Materials
AFFF.....Aqueous Film Forming Foam
AFTIL.....Airport Facilities Terminal Integration Laboratory
AGL.....Above Ground Level
AIRFA.....American Indian Religious Freedom Act
ALP.....Airport Layout Plan
AMSL.....Above Mean Sea Level
ARFF.....Aircraft Rescue Firefighting
ARPA.....Archaeological Resources Protection Act
ASL.....Above Sea Level
AST.....Above Ground Storage Tank
ATCT.....Air Traffic Control Tower
APE.....Area of Potential Effects
AWIA.....America's Water Infrastructure Act
BCC.....Birds of Conservation Concern
bgs.....below ground surface
BIL.....Bipartisan Infrastructure Law
BLM.....Bureau of Land Management
BMP.....Best Management Practice
CAA.....The Clean Air Act
CAL-IPC.....California Invasive Plant Council
CARB.....California Air Resources Board
CEQ.....Council on Environmental Quality
CERCLA.....Comprehensive Environmental Response, Compensation, and Liability Act
CESA.....California Endangered Species Act
CFR.....Code of Federal Regulations
CO.....Carbon Monoxide
CO_2.....Carbon Dioxide
CZMA.....Coastal Zone Management Act
DOI.....Department of Interior
DOT.....Department of Transportation
EA.....Environmental Assessment
EFH.....Essential Fish Habitat
EO.....Executive Order
EPA.....U.S. Environmental Protection Agency
EPCRA.....Emergency Planning and Community Right to Know Act
ESA.....Endangered Species Act
EPCRA.....Emergency Planning and Community Right to Know Act
FAA.....Federal Aviation Administration
FBO.....Fixed-Base Operator
FEMA.....Federal Emergency Management Agency
FIRM.....Flood Insurance Rate Map
FHWA.....Federal Highway Administration
FONSI.....Finding of No Significant Impact
GHG.....Greenhouse Gas
GSS.....Giant Garter Snake
HABS.....Historic American Building Survey
HAP.....Hazardous Air Pollutants
HMS.....Hazardous Materials Survey
HREC.....Historic Recognized Environment Condition
IIJA.....Infrastructure Investment and Jobs Act
IPaC.....Information for Planning and Consultation
LOS.....Line-of-Sight
LUST.....Leaking Underground Storage Tank
MBTA.....Migratory Bird Treaty Act
n.d.....No Date
MCL.....Maximum Contaminant Levels
MOA.....Memorandum of Agreement
MOU.....Memorandum of Understanding
NAAQS.....National Ambient Air Quality Standards
NAGPRA.....Native American Graves Protection and Repatriation Act
NEPA.....National Environmental Policy Act
NFA.....No Further Action
NHL.....National Historic Landmark
NHPA.....National Historic Preservation Act of 1966
NMFS.....National Marine Fisheries Service
NO_2.....Nitrogen Dioxide Administration
NPDES.....National Pollutant Discharge Elimination System
NPL.....National Priorities List
NPPA.....Native Plant Protection Act
NPS.....National Park Service
NRHP.....National Register of Historic Places
NRI.....Nationwide Rivers Inventory
O_3.....Ozone
Pb.....Lead
PCB.....Polychlorinated Biphenyls
PFAS.....Per- and Polyfluoroalkyl Substances
PFBS.....Perfluorobutanesulfonic Acid
PFHxS.....Perfluorohexanesulfonic Acid
PFOA.....Perfluorooctanoic Acid
PFOS.....Perfluorooctane Sulfonate
P.L.....Public Law
PM.....Particulate Matter
ppm.....parts per million
PV.....Photovoltaic
PVC.....Polyvinyl Chloride

RCRA..... Resource Conservation and Recovery Act
REC..... Recognized Environment Condition
RD 1000 ..... Reclamation District 1000
ROD ..... Record of Decision
RSL..... Regional Screening Levels
SHPO..... State Historic Preservation Officer
SIP..... State Implementation Plans
SMAQMD..... Sacramento Metropolitan Air Quality Management District
SMF..... Sacramento International Airport
SMUD..... Storm Water Pollution Prevention Plan
SO_2 ..... Sulfur Dioxide
SWPPP ..... Sacramento Municipal Utility District
TCP..... Traditional Cultural Property
TERPS..... United States Standard for Terminal Instrument Procedures
THPO..... Tribal Historic Preservation Officer
TIP..... Tribal Implementation Plan
TRI ..... Toxic Release Inventory
TSCA..... Toxic Substances Control Act
U.S.C..... U.S. Code
USACE..... U.S. Army Corps of Engineers
USFWS..... U.S. Fish and Wildlife Service
USGS..... U.S. Geological Survey
UST ..... Underground Storage Tank
WHMP ..... Wildlife Hazard Management Plan
WSRA..... Wild and Scenic Rivers Act

SECTION 1 | INTRODUCTION

1.1 OVERVIEW

The Federal Aviation Administration (FAA) is proposing to replace the existing Airport Traffic Control Tower (ATCT) and administrative base building at Sacramento International Airport (SMF) in Sacramento, CA. The National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] § 4321 et seq.), requires that a federal agency prepare a statement of environmental impacts as part of the development process for projects requiring a federal action, such as funding, approving, or permitting.

In 2013, the FAA published a Final Environmental Assessment (EA) and the Finding of No Significant Impact (FONSI) and Record of Decision (ROD) for the replacement ATCT and administrative base building (Jacobsen Daniels Associates, LLC, 2013). The proposed project did not receive funding following the release of the 2013 Final EA and it was placed on hold until it was funded in 2025. The 2013 Final EA and FONSI/ROD were prepared under FAA Order 1050.1E CHG 1 *Environmental Impacts: Policies and Procedures*.[1]

Because the previous 2013 Final EA is over 10 years old and environmental laws and policies have since changed, this Draft Supplemental EA is evaluating the existing environment and analyzing the reasonably foreseeable environmental consequences of the proposed alternatives under FAA Order 1050.1G (FAA, 2025a). Due to the changes in the FAA Orders from 1050.1E to 1050.1G, some resources have been removed from analysis and others may reflect revised nomenclature or other changes. Some resources remain the same and require only minor updates. For these resources, information from the 2013 Final EA is incorporated by reference. Table 1-1 displays the 2013 Final EA resource areas analyzed and the resource area changes considered in this Draft Supplemental EA.

Table 1-1. Resource Areas Analyzed in the 2013 Final EA Compared to this 2025 Draft Supplemental EA Based on FAA Orders

2013 Final EA – Order 1050.1E	2025 Draft Supplemental EA – Order 1050.1G
Air Quality	Aviation Emissions and Air Quality
Coastal Resources	Coastal Resources
Compatible Land Use	Land Use
Department of Transportation Act: Section 4(f)	Department of Transportation Act Section 303 (referred to as "Section 4(f)") and Land and Water Conservation Fund (referred to as “Section 6(f)”)
Farmlands	Farmlands

[1] FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, was published on July 3, 2025. Projects that commence after July 3, 2025 are required to comply with FAA Order 1050.1G. While the 2013 Final EA and FONSI/ROD were completed under FAA Order 1050.1E CHG 1, this Supplemental EA was completed under FAA Order 1050.1G. This change between Orders encompasses and relies upon the Fiscal Responsibility Act of 2023; Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit Based Opportunity;* Executive Order 14154, *Unleashing American Energy*; and the Supreme Court decision in Seven County Infrastructure Coalition v. Eagle County, 605 U.S. 168 (2025). As a result, this Supplemental EA does not include an analysis of environmental justice, climate change, or cumulative impacts.

2013 Final EA – Order 1050.1E	2025 Draft Supplemental EA – Order 1050.1G
Fish, Wildlife, and Plants	Biological Resources (including fish, wildlife, and plants)
Floodplains	Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
Hazardous Materials, Pollution Prevention, and Solid Waste	Hazardous Materials, Solid Waste, and Pollution Prevention
Historical, Architectural, Archeological, and Cultural Resources	Historical, Architectural, Archeological, and Cultural Resources
Light Emissions and Visual Impacts	Visual Effects (including light emissions)
Natural Resources and Energy Supply	Natural Resources and Energy Supply
Noise	Noise and Noise-Compatible Land Use
Socioeconomics Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks	Socioeconomics and Children's Health and Safety Risks
Water Quality	Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
Wetlands	Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
Wild and Scenic Rivers	Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
Climate	NA

(FAA, 2006; FAA, 2025a)

1.2 PROPOSED ACTION

The FAA's Proposed Action is to replace the existing FAA-owned ATCT with a modern ATCT facility at SMF. Figure 1-1 provides an aerial image of the airport property. The Proposed Action includes the following activities:

- Acquisition of a new lease with the airport authority to construct an ATCT in a new location.
- Unconditional approval of portions of the Airport Layout Plan (ALP) that depict those portions of the Proposed Project subject to FAA review and approval pursuant to 49 USC §47107(a)(16).
- Construction and operation of a replacement ATCT, an administrative base building, and other associated facility support features such as a parking area and security fences.
- Extension and/or relocation of access roads and utilities to the replacement ATCT.
- Installation of modern air traffic control electronic equipment in the replacement ATCT.
- Commissioning of the replacement ATCT, cutover of air traffic services to the replacement ATCT, and decommissioning of the existing ATCT and base building.
- Demolition and disposal of the existing ATCT facility, base building, and associated infrastructure.
- The estimated construction start date to replace the ATCT is late 2026.

1.3 BACKGROUND

1.3.1 Airport Information

SMF is located in the City of Sacramento in Northern California and serves the communities of the greater Sacramento area, including El Dorado County, Placer County, Sacramento County, Sutter County, Yolo County, and Yuba County. In 2024, the airport conducted 266,621 operations for commercial service, cargo flights, private air traffic, and fixed-base operator (FBO) services (FAA, 2025d). SMF is located approximately 12 miles northwest of downtown Sacramento. The airport property was privately owned until it was sold in 1948 to Sacramento County and SMF is currently owned by the Sacramento County Airport System (Sacramento County, n.d. (b)).

The airport originally opened as Sacramento Metropolitan Airport in 1967. Over the years, significant updates have been made at SMF to meet the increasing passenger needs. Improvements in the 1980s included construction of a new cargo facility, the east runway, an FAA Inspection Field Office, and an in-flight catering facility. In 1998, the airport constructed a new Terminal A and a consolidated rental car terminal was also introduced as a new concept in the 1990s. The airport was renamed Sacramento International Airport following the opening of Terminal A. In 2008, SMF began construction of a new, larger Terminal B to replace the original B Terminal, which was completed in 2011. To date, SMF offers a total of 12 commercial air carriers and provides support facilities for FBOs, private tenants, air cargo, aircraft storage and hangars, aircraft rescue and firefighting, aircraft maintenance and repairs, deicing, and catering services (Sacramento County, n.d. (b)).

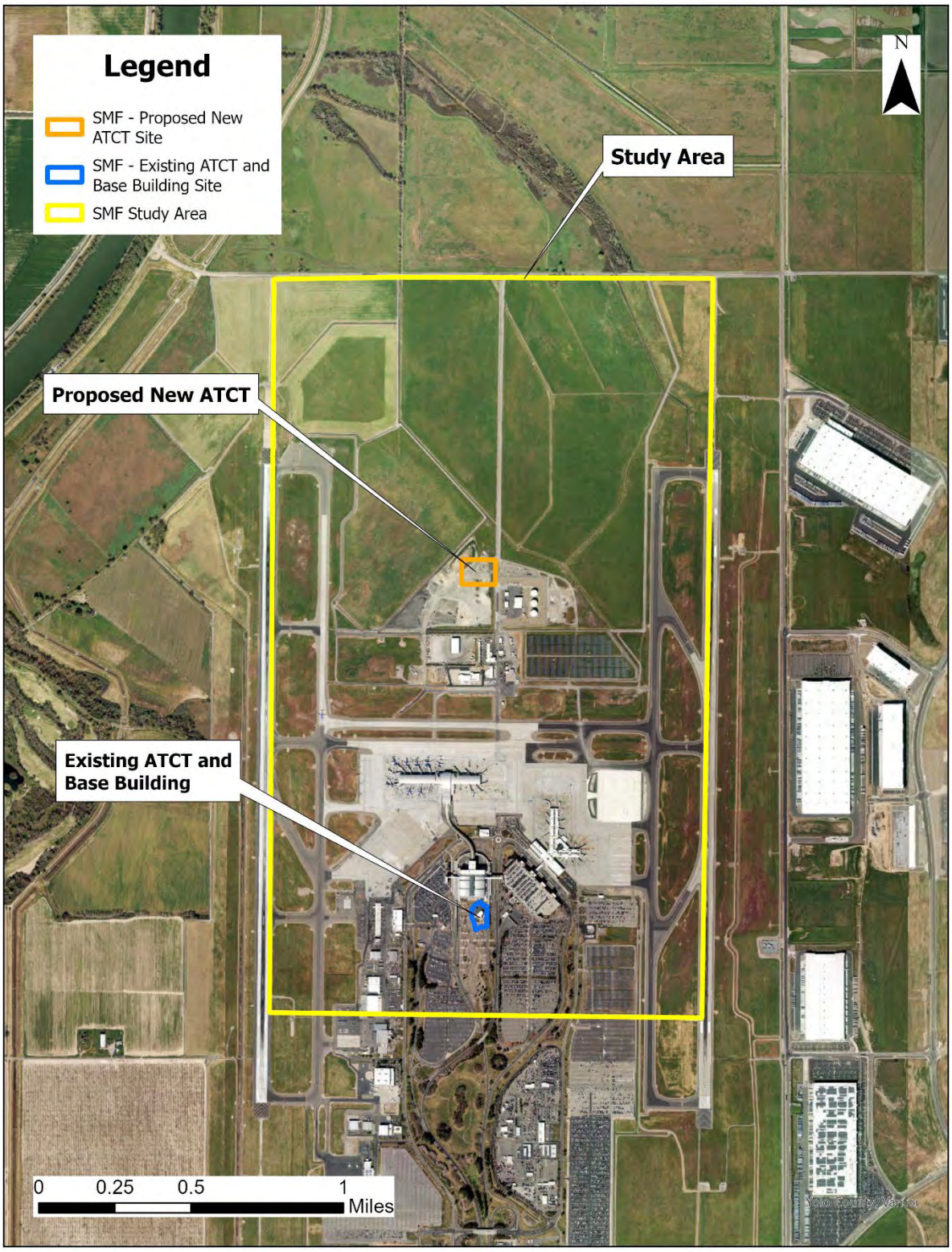

Figure 1-1. Aerial Image of the Study Area at SMF

1.3.2 Existing Airport Traffic Control Tower Information

Commissioned in 1967, the existing SMF ATCT is an I. M. Pei tower design type (Figure 1-2). The existing ATCT has a cab size of 350 square feet with a cab eye level at 125 feet above ground level (AGL) and stands a total of 175 feet AGL (FAA Air Traffic Organization Technical Operations AJW-2 AJW-2444, 2024). The existing tower is surrounded by a base building which contains FAA and ATCT offices and auxiliary spaces for personnel. Both structures are located south of Terminal B and southwest of Terminal A, between the south ends of the two main runways with vehicle access from Airport Boulevard West. The existing ATCT and base building are located in the center portion of the airport on Alan Boyd Drive at 38° 41' 26" N, 121° 35' 27" W. The ATCT operates 24 hours daily, 7 days a week with 5 to 6 personnel on duty per shift with a minimum of 3 controllers (Booz Allen Hamilton, 2025a).

Figure 1-2. Existing SMF ATCT and Base Building

SECTION 2 | PURPOSE AND NEED

2.1 PURPOSE

The SMF ATCT is an FAA-owned ATCT proposed for replacement. The purpose of the Proposed Action is to replace the SMF ATCT with a modern ATCT and base building providing for safe, efficient, and uninterrupted air traffic control services.

The Proposed Action at this airport would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements. The replacement ATCT and base building would enable the installation of modern and required air traffic control equipment, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to efficient design including energy efficient features, windows, and ventilation/heating systems while meeting applicable FAA requirements.

2.2 NEED

The FAA recognizes the need to provide continual air traffic control services at SMF. The existing SMF ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies and lacks the personnel space requirements and modern amenities. The existing ATCT is over 59 years old, and the structure has physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., electrical, grounding, and plumbing) and needs seismic upgrades. As the airport has grown, the current location of the existing ATCT has encountered line of sight issues from new construction. Improvements made to rectify these situations would ensure uninterrupted air traffic control services to maintain the safety of the National Airspace System (NAS). The existing base building surrounds the existing ATCT and is the same age as the ATCT. A new, updated administrative base building would provide offices, break rooms, and associated workspace.

SECTION 3 | ALTERNATIVES

In compliance with FAA Order 6480.4C, *Siting of Airport Traffic Control Towers (ATCT),* the FAA adheres to a siting process to provide the lowest cost ATCT that meets all siting criteria for the establishment or replacement of an ATCT facility (FAA, 2025b). This siting process takes into consideration multiple technical criteria, as prescribed in FAA Order 6480.4C.

Representatives from the FAA and SMF airport conducted siting for this project working with the Airport Facilities Terminal Integration Laboratory (AFTIL). The AFTIL developed 3-dimensional airport models and simulations for the siting team to visualize line-of-sight (LOS) from any position on the airport.

In 2009, eight sites were initially considered during the ATCT siting process as possible locations for the proposed new ATCT. All but three sites were eliminated due to height requirements, visibility issues, future airport expansion considerations, security issues, United States Standard for Terminal Instrument Procedures (TERPS) violations, and safety concerns. Of the three remaining sites, one was eliminated due to setback requirements and look-down angles and therefore not carried forward because it did not meet the technical siting criteria as outlined in FAA Order 6480.4A. Of the two remaining sites, Sites C and E, Site E was chosen as the best location for safety and future airport operations. In 2011, re-siting was conducted and Site E was determined to have safety concerns. Site C and an adjusted Site E were re-analyzed, and Site C was ultimately chosen as the recommended site. In 2023 and 2024, following FAA Order 6480.4B, additional analysis was conducted for the ATCT design on Site C, which resulted in slight shifts in tower cab position for LOS to account for future airport construction. This Draft Supplemental EA evaluates the selected site alternative, Site C as the Proposed Action for replacing the existing ATCT, which meets the current FAA ATCT siting process under FAA Order 6480.4C, and the No Action Alternative (not constructing a new ATCT and base building). Figure 3-1 displays the proposed layout of the new ATCT and base building.

3.1 ALTERNATIVE 1: PROPOSED ACTION

The Proposed Action, as determined by the siting process governed by FAA Order 6480.4C, is the construction and operation of a replacement ATCT and base building at a site referred to in the siting report as Site C. Site C, hereinafter referred to as the proposed new ATCT site, is located at a latitude of 38° 42'10.00" N and a longitude of 121° 35' 30.14" W, approximately 4,417 feet north of the existing ATCT and base building. This location was deemed most technically feasible of the siting alternatives considered based on the siting criteria (FAA Air Traffic Organization Technical Operations AJW-2 AJW-2444, 2024).

The proposed new ATCT site is located approximately 2,640 feet north of Concourse B, north of Taxiways W and Y, and between Runways 17L/35R and 17R/35L. The proposed new ATCT site is approximately 13.5 acres and consists of bare ground, gravel, and patches of old asphalt with scattered non-native and other plant species (Booz Allen Hamilton, 2025a). The proposed new ATCT cab floor elevation would be 175 feet AGL, 150 feet above mean sea level (AMSL) with a total height of 190 feet AGL (210 feet AMSL). This is the minimum height that would meet all siting criteria under the Safety Management System. At this height,

controllers would have unobstructed views of all airport-controlled areas and airborne traffic. The proposed new ATCT would have a 12-sided, 550 square foot cab. This proposed design would allow for a safe operating environment and offer better proximity to the final approach of each runway. The planned new one-story base building would be approximately 13,000 square feet and house offices, break rooms, and associated workspace (Walsh, 2025; FAA, 2025b).

An asphalt parking lot, emergency generator with above ground fuel storage tank, and perimeter fencing would be part of the Proposed Action. New subsurface power and communication lines would be extended from existing lines located on Earhart Drive or from the end of Runway 17R. Natural gas and sanitary sewer would be accessed from existing lines near Earhart Drive. Other utilities would be accessed from existing lines within the proposed new ATCT site. Vehicle access to the proposed new ATCT would be through Gate 7E (echo) located on the northeast side of the existing fence line adjacent to Alberta Road via Earhart Drive. These existing roads would be used for construction and maintenance traffic, and a paved access road would be extended to the proposed new ATCT site (FAA, 2025c; Jacobsen Daniels Associates, LLC, 2013).

3.2 ALTERNATIVE 2: NO ACTION

A No Action Alternative is required to be included in this Draft Supplemental EA consistent with FAA Order 1050.1G. The No Action Alternative is defined as maintaining the status quo (baseline conditions) without construction of a new ATCT and base building. The No Action Alternative is used to evaluate the effects of not replacing the ATCT and provides a benchmark against which other alternatives may be evaluated. Therefore, for purposes of comparative analysis in this Draft Supplemental EA, the No Action Alternative represents the conditions that would be reasonably foreseeable if Alternative 1 (Proposed Action) were not implemented.

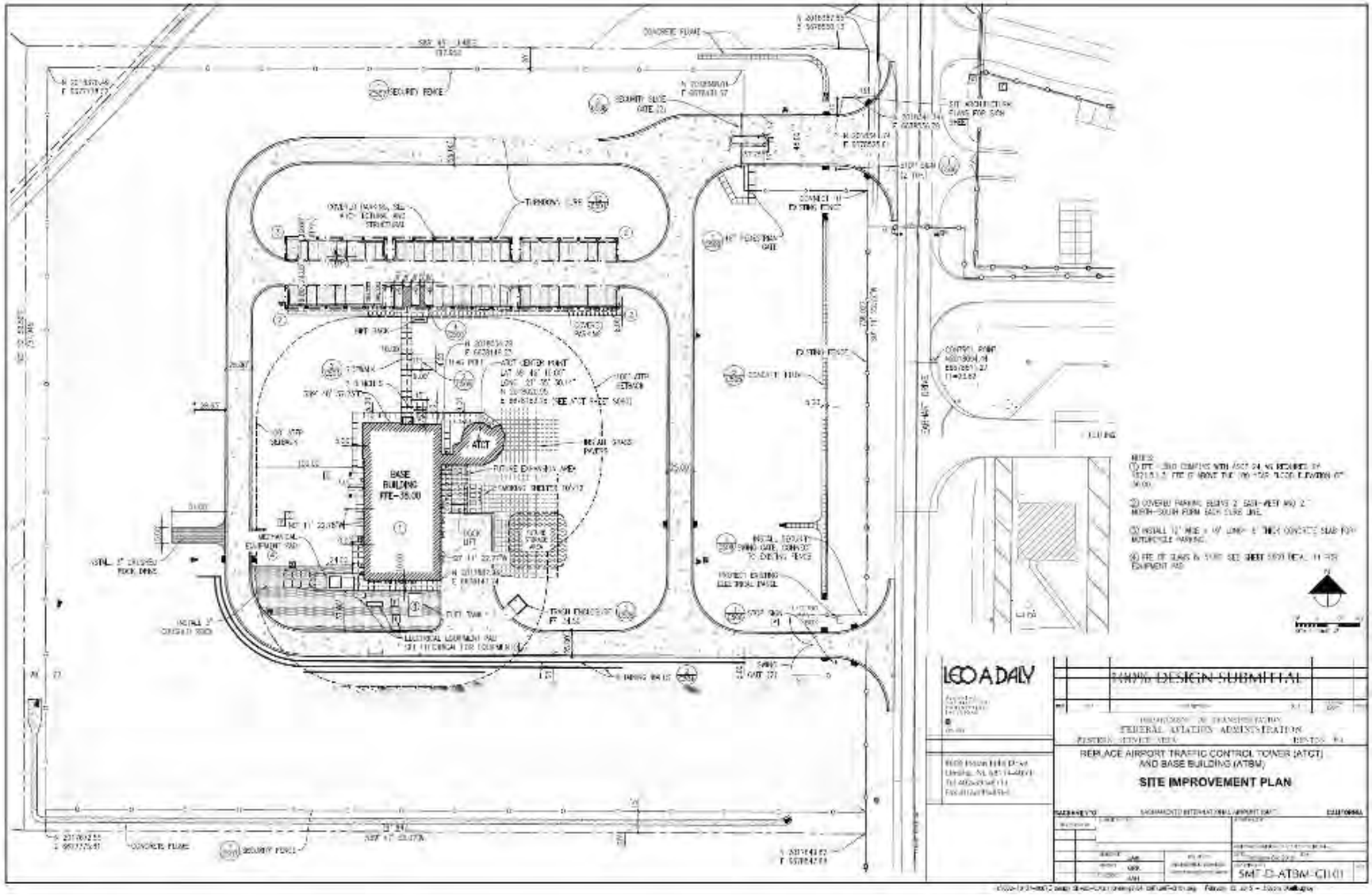

Figure 3-1. Proposed Layout of Replacement ATCT and Base Building

SECTION 4 | AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section provides documentation of existing environmental resource conditions or affected environment at SMF and surrounding area. Figure 1-1 identifies the study area for this Draft Supplemental EA. In addition, the smaller area encompassing the Proposed Action—the existing SMF ATCT and the proposed new ATCT site—is described as the project area. This section also analyzes the reasonably foreseeable environmental consequences from each alternative for each resource category.

4.1 AVIATION EMISSIONS AND AIR QUALITY

Air quality is the measure of the type and quantity of pollutants in the atmosphere, the size and topography of the airshed, and meteorological (weather) conditions. Overall, the concentration of pollutants in the atmosphere forms the basis of air quality in an area. Air quality regulations are founded on concerns that high concentrations of air pollutants can harm human health, particularly for the elderly, children, and people with compromised health conditions, in addition to causing potential damage to the natural (e.g., agricultural lands, vegetation) and built environments (e.g., buildings, infrastructure).

4.1.1 Regulatory Setting

The Clean Air Act (CAA), as amended (42 U.S.C. §§ 7401-7671q), requires the establishment of National Ambient Air Quality Standards (NAAQS) for six common air pollutants (carbon monoxide [CO], nitrogen dioxide [NO_2], ozone [O_3], particulate matter [PM], sulfur dioxide [SO_2], and lead [Pb]) (40 Code of Federal Regulations [CFR] Part 50) and designating attainment or nonattainment areas based on those NAAQS within a state. The Environmental Protection Agency (EPA) designates areas as "attainment" when meeting NAAQS or "nonattainment" when not meeting NAAQS after collecting monitoring data. In addition, the CAA requires compliance with General and Transportation Conformity regulations.[2]

Section 176(c) of the CAA (42 U.S.C. §§ 7571-7574), Determining Conformity of General Federal Actions to State or Federal Implementation Plans (40 CFR Part 93, Subpart B) identifies criteria for determining if a proposed federal action conforms to state (or federal) air quality implementation plans. The FAA is only required to demonstrate general conformity for the Proposed Action.

The CAA requires compliance with the NAAQS (40 CFR Part 50). Compliance is when the ambient outdoor levels of the NAAQS air pollutants are safe for human health, public welfare, and environment. These are further divided into primary standards to set limits to protect public health, including sensitive populations (e.g., elderly, children, asthmatics), and secondary standards to establish limits to protect from visibility issues and damage to the

[2] The Transportation Conformity Regulations apply to highways and mass transit and establish the criteria and procedures for determining whether transportation plans, programs, and projects funded under title 23 U.S.C. or the Federal Transit Act conform with the SIP (EPA, 2022d).

natural (e.g., animals, agricultural crops, vegetation) and built environments (e.g., physical structures) (EPA, 2022a).

A variety of sources generate air pollution emissions:

- Carbon dioxide (CO_2) is generated by motor vehicles and from wood burning activities.
- NO_2 is a product of combustion; observed as a brown haze.
- O_3 is formed when organic gases react with NO_2.
- Smoke includes PM.
- Fossil fuel burning results in SO_2.
- Pb from ore and metal processing and combustion of leaded fossil fuel (WHO, 2025).

Compliance with the NAAQS provides a method to enforce air quality standards by establishing measurable maximum allowable amounts. Table 4-1 identifies the primary and secondary NAAQS for the six criteria pollutants.

Table 4-1. California Air Resources Board and National Ambient Air Quality Standards from EPA's Nonattainment Areas for Criteria Pollutants (Green Book)

Pollutant	Primary/ Secondary	Averaging Time	The California Air Resources Board Level	EPA Level	Form
Carbon Monoxide (CO)	Primary	8 hours	9 parts per million (ppm)	9 ppm	not to be exceeded more than once per year
Carbon Monoxide (CO)	Primary	1 hour	20 ppm	35 ppm	not to be exceeded more than once per year
Lead (Pb)	Primary and secondary	Rolling 3-month average	NA	0.15 microgram (µg)/meter $(m)^3$ (1)	not to be exceeded
Nitrogen Dioxide (NO_2)	Primary	1 hour	0.18 ppm	100 parts per billion (ppb)	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
Nitrogen Dioxide (NO_2)	Primary and secondary	1 year	0.030 ppm	53 ppb (2)	annual mean
Ozone (O_3)	Primary and secondary	8 hours	0.070 ppm	0.070 ppm (3)	annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particulate Matter (PM) - $PM_{2.5}$	Primary	1 year	12 µg/m^3	12.0 µg/m^3	annual mean, averaged over 3 years
Particle Pollution (PM) – $PM_{2.5}$	Secondary	1 year	NA	15.0 µg/m^3	annual mean, averaged over 3 years
Particle Pollution (PM) – $PM_{2.5}$	Primary and secondary	24 hours	NA	35.0 µg/m^3	98th percentile, averaged over 3 years

Pollutant	Primary/ Secondary	Averaging Time	The California Air Resources Board Level	EPA Level	Form
Particulate Matter (PM) - PM_{10}	Primary and secondary	24 hours	50 µg/m^3	150 µg/m^3	not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO_2)	Primary	1 hour	0.25 ppm	75 ppb (4)	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
Sulfur Dioxide (SO_2)	Secondary	3 hours	NA	0.5 ppm	not to be exceeded more than once per year
Sulfates	NA	24 hours	25 µg/m^3	NA	NA
Hydrogen Sulfide	NA	1 hour	0.03 ppm	NA	NA
Vinyl Chloride	NA	24 hours	0.01 ppm	NA	NA

Notes:

(1) In areas designated nonattainment for the Pb standards prior to the promulgation of the current (2008) standards, and for which implementation plans to attain or maintain the current (2008) standards have not been submitted and approved, the previous standards (1.5 µg/m^3 as a calendar quarter average) also remain in effect.

(2) The level of the annual NO_2 standard is 0.053 ppm. It is shown here in terms of ppb for the purposes of clearer comparison to the 1-hour standard level.

(3) Final rule signed October 1, 2015, and effective December 28, 2015. The previous (2008) O_3 standards are not revoked and remain in effect for designated areas. Additionally, some areas may have certain continuing implementation obligations under the prior revoked 1-hour (1979) and 8-hour (1997) O_3 standards.

(4) The previous SO_2 standards (0.14 ppm 24-hour and 0.03 ppm annual) will additionally remain in effect in certain areas: (1) any area for which it is not yet 1 year since the effective date of designation under the current (2010) standards, and (2) any area for which an implementation plan providing for attainment of the current (2010) standard has not been submitted and approved and which is designated nonattainment under the previous SO_2 standards or is not meeting the requirements of a SIP call under the previous SO_2 standards (40 CFR 50.4(3)). A SIP call is an EPA action requiring a state to resubmit all or part of its State Implementation Plan to demonstrate attainment of the required NAAQS.

Source: (EPA, 2022a) (California Air Resources Board, 2024)

Under the CAA, when an area does not meet the NAAQS for a criteria pollutant, it may be subject to a formal rulemaking that designates it as a "nonattainment" area categorized based on the severity of their NAAQS exceedance from marginal, moderate, serious, severe, to extreme (EPA, 2022a). Attainment status can be described in one of four ways and determines whether air pollution control measures are required and for which criteria air pollutants an area may be in attainment for some pollutants and in nonattainment for others (40 CFR Part 81).

The four attainment classifications are:

- Attainment: Area meets the NAAQS (primary or secondary) for the pollutant.
- Nonattainment: Area that does not meet (or that contributes to a nearby area that does not meet) the NAAQS (primary or secondary) for the pollutant.
- Maintenance: Area that once violated the NAAQS (previous nonattainment areas) but currently achieves the NAAQS.

- Unclassifiable: Area that cannot be classified based on available information for the pollutant (40 CFR Part 81).

The CAA requires preparation of State Implementation Plans (SIP) for EPA approval for "nonattainment areas." A SIP includes those regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce NAAQS (or for a Tribe, a Tribal Implementation Plan [TIP]). A SIP or TIP typically includes control measures (statutes, regulations, or source-specific requirements) adopted by the state, non-regulatory components submitted by the state, or other requirements identified by the EPA to meet Section 110 or Part D of the CAA (EPA, 2022b).

In addition to the NAAQS, air quality can be impacted by hazardous air pollutants (HAP). These are chemicals that might not be as widespread but are potentially more toxic (e.g., benzene, mercury). The 1990 CAA Amendments identified a list of 188 chemicals and compounds considered as HAPs.[3]

Under 72 *Federal Register* 145, Federal Presumed to Conform Actions Under General Conformity, the FAA identified a list of actions presumed to conform to an applicable SIP for the criteria pollutants and their precursors as identified under 40 CFR Part 93.153(b)(1) and (b)(2) and in the NAAQS. With this Rule, under existing exemptions, Routine Installation and Operation of Navigation Aids, the in-kind replacement of navigational aids, such as ATCTs, are "presumed to conform because these activities would not generate emissions that exceed *de minimis* levels" (Federal Register, 2007).

California health and safety code established a program to secure data on air quality in each air basin established by the state board. The California Air Resources Board (CARB) established state area designations and criteria. CARB uses these criteria to conduct annual reviews for 10 pollutants: O_3, suspended particulate matter (PM_{10} and $PM_{2.5}$), CO, NO_2, SO_2, sulfates, Pb, hydrogen sulfide, and visibility reducing particles, see Table 4-1. There is no national standard for sulfates, hydrogen sulfide, and vinyl chloride. California designates areas in attainment and nonattainment under federal and state pollutant criteria (California Air Resources Board, 2025a).

4.1.2 Affected Environment

California follows attainment standards set by the EPA and CARB designating attainment and nonattainment areas by county. The EPA identifies Sacramento County as a non-attainment area for 8-hour Ozone (2008 and 2015 standard) and PM2.5-(24-hr 2006 standard); and a maintenance area for PM10 (1987 standard) (EPA, 2025b).

The Sacramento Metropolitan Air Quality Management District (SMAQMD) operates eight air quality monitoring stations across the county. Additionally, CARB operates one monitoring station in Sacramento County. The site closest to SMF is located at a monitoring building (Bercut Site), 8.21 miles southeast of the existing SMF ATCT. The monitoring stations test for CO_2 NO_2, and $PM_{2.5}$ data (Sacramento Metropolitan Air Quality Management

[3] A list of regulated HAPs can be found on the EPA's Air Toxics website at: http://www.epa.gov/ttn/atw/orig189.html.

District, 2025). In the past year, no NAAQS exceedances were recorded at the Bercut Monitoring site for CO_2 NO_2, $PM_{2.5}$, (California Air Resources Board, 2025b).

SMF is located in the Central Valley region of northern California. The airport is relatively flat, elevation to the west, north, and south of SMF is approximately 26.9 feet above sea level (ASL) and increases toward the downtown area of the city of Sacramento to around 33 feet ASL (AirNav, 2025). The Central Valley of California is bounded to the west by the Coast Range, the Cascade Range and Klamath Mountains to the north, and the Sierra Nevada Mountains to the east. Based on the topology, winds, and existing air quality concerns, SMF is situated where NAAQS pollutants could be collected or concentrated. Presently, SMF is at risk of becoming a nonattainment area with current air quality conditions, regulations, and geography; however, the SMAQMD continues to implement and monitor air quality improvement measures.

4.1.3 Environmental Consequences

The FAA established a significance threshold for air quality in FAA Order 1050.1G, Appendix A (FAA, 2025a).

- No Impact: Impacts to air quality would not occur as a result of the Proposed Action.
- Significant Impact: The FAA identified the significance threshold as an "action that would cause pollutant concentrations to exceed one or more of the NAAQS, as established by the Environmental Protection Agency under the Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations." (FAA, 2025a)

4.1.3.1 Alternative 1: Proposed Action

Following the CAA, the FAA identified the in-kind replacement of an ATCT as "presumed to conform because these activities would not generate emissions that exceed *de minimis* levels." Emissions generated by heavy construction equipment are negligible given the temporary nature of these activities and limited number of vehicles involved (Federal Register, 2007).

The demolition of the existing ATCT and base building and construction of the proposed new replacement ATCT and base building is unlikely to result in an exceedance of air quality standards beyond the current conditions or in more than a temporary *de minimis* increase in emissions. Sacramento County is in federal nonattainment for O_3 and $PM_{2.5}$. Air quality impacts resulting from construction related activities under the Proposed Action would be short-term and temporary[4] in nature. Emissions would not be expected to exceed NAAQS for criteria air pollutants and CARB standards as described in Table 4-1. The energy efficient design of the proposed new ATCT would result in lower long-term emissions and air pollutants from heating and cooling generation fueled by natural gas and electricity. Applying best management practices (BMP) to construction and demolition activities would prevent or reduce emissions and air pollutants from the Proposed Action.

[4] Short-term and temporary refers to the duration of the construction period of the project.

The construction of the proposed new ATCT would not increase the forecast number of future aircraft operations and no additional aircraft emissions at SMF would be expected beyond previous forecasts. No new roads would be constructed to access the proposed new ATCT site, which prevents additional emissions and introduction of particulate matter from dust into the air.

No significant impacts to air quality are expected due to the *de minimis* nature of the Proposed Action, energy efficient design of the proposed new ATCT, and application of BMPs to further protect air quality.

4.1.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be removed and replaced, and activities associated with the ATCT and base building would remain the same. No impacts to existing air quality conditions or emissions.

4.1.4 Best Management Practices

Construction and demolition-related emissions can be reduced or prevented by applying the following BMPs for emissions:

- Dust control BMPs can include, but are not limited to, spraying water to minimize dust, limiting the area of uncovered soil to the minimum needed for each activity, proper siting of staging areas to minimize fugitive dust, placement of mulch or a temporary gravel cover, using a soil stabilizer (or chemical dust suppressor), limiting the number and speed of construction vehicles at the site, and adding covers to trucks hauling dirt on or off the site.
- Revegetation or stabilization of soils immediately following ground disturbance.
- Emission BMPs for construction vehicles and equipment can include, but are not limited to, limiting vehicle idling times, usage of low or ultra-low sulfur fuel and biodiesel, conducting proper vehicle engine maintenance, and using electric instead of gas-powered tools.
- Source locally available products and materials to reduce transportation-related emissions to the site.

4.2 BIOLOGICAL RESOURCES (INCLUDING FISH, WILDLIFE, AND PLANTS)

Biological resources include native plants, animals, and their habitats. Protected and sensitive biological resources include federally listed (endangered[5] or threatened[6]), and candidate[7] species designated by the U.S. Fish and Wildlife Service (USFWS), National

[5] Endangered species are "any species which is in danger of extinction throughout all or a significant portion of its range" (ESA, Section 3(6)).

[6] Threatened species are "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range" (ESA, Section 3(20)).

[7] Candidate species are any species whose status is under review "to determine whether it warrants listing under the ESA" (ESA, Section 4).

Marine Fisheries Service (NMFS), or a State. Sensitive habitats described in this section include those areas designated by the USFWS as critical habitat[8] protected by the Endangered Species Act of 1973 (ESA; 16 U.S.C. Chapter 35 § 1531 et seq.)

4.2.1 Regulatory Setting

The ESA (16 U.S.C. §§ 1531-1544) requires federal agencies to conserve endangered species by listing endangered and threatened species of plants and animals and designating critical habitats for animal species. The ESA defines an endangered species as "any species which is in danger of extinction throughout all or a significant portion of its range" and a threatened species as "any species which is likely to become an endangered species within the foreseeable future." Section 7 of the ESA requires federal agencies, in consultation with USFWS and/or NMFS, to ensure their actions are not likely to jeopardize the continued existence of any endangered or threatened species or to result in the destruction or adverse modification of critical habitat. The ESA defines critical habitat as specific geographic areas that are essential for the conservation of a threatened or endangered species and that may require special management and protection (USFWS, 2007a).

The Fish and Wildlife Coordination Act (16 U.S.C. § 662(a)) identifies that when a federally approved or financed action may result in control or modification of the water of any stream or waterbody, the responsible federal agency must consult with the USFWS regarding the conservation of wildlife resources.

Executive Order (EO) 13112, Invasive Species, as amended EO 13751, directs federal agencies whose actions may affect the status of invasive species to use relevant programs and authorities, to the extent practicable and subject to available resources, to prevent the introduction of invasive species, and to provide for the restoration of native species and habitat conditions in ecosystems that have been invaded. Agencies are directed not to conduct actions that they believe are likely to cause or promote the introduction or spread of invasive species unless the benefits of such actions clearly outweigh the potential harm, and all feasible and prudent measures to minimize risk of harm are taken. Invasive species are defined by the EO as a non-native (regarding a particular ecosystem) organism whose introduction causes or is likely to cause economic or environmental harm, or harm to human, animal, or plant health.

The Magnuson-Stevens Fishery Conservation and Management Act of 1976, as amended by the Sustainable Fisheries Act (16 U.S.C. § 1855(b)(2) et seq.; see 50 CFR Part 600 for implementing regulations) prohibits actions that may affect essential fish habitat (EFH) defined as "those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity" for all managed species. Regional Fishery Management Councils

[8] Critical habitat refers to "(i) the specific areas within the geographical area occupied by the species, at the time it is listed in accordance with the provisions of section 4 of this Act, on which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection; and (ii) specific areas outside the geographical area occupied by the species at the time it is listed in accordance with the provisions of section 4 of this Act, upon a determination by the Secretary that such areas are essential for the conservation of the species" (ESA, Section 3(5)(A)).

throughout the country identify and describe fishery management plans to protect certain anadromous fish species. If an action would affect an EFH, an impact assessment on the affected EFH is needed. The EFH assessment and any mitigation measures are done in consultation with NMFS.

The Migratory Bird Treaty Act of 1918 (MBTA) (16 U.S.C. §§ 703-711) prohibits actions of taking, selling, or conducting other activities that would harm migratory birds, their eggs, or nests (such as removal of an active nest or nest tree). If it is determined there are no feasible alternatives to taking the migratory bird or its nest, USFWS and the Secretary of Interior must issue a permit for the taking and would require mitigation.

EO 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, directs federal agencies to further implement and strengthen the MBTA. Specifically, federal agency actions that have, or are likely to have, a measurable negative effect on migratory bird populations require development and implementation of a Memorandum of Understanding (MOU) with USFWS that promotes the conservation of migratory bird populations. The EO and MOUs are the regulatory basis for conservation actions or renewal of contracts, permits, delegations, or other third-party agreements associated with migratory birds. MOUs established under EO 13186 are published in the *Federal Register*.

Congress passed the Bald and Golden Eagle Protection Act of 1940 (amended in 1962) to protect both these avian species. The bald eagle was officially adopted as the Nation's symbol in 1782. From that time until 1940, population numbers for the bald eagle rapidly declined due to hunting, insecticide use, and habitat loss. To prevent the extinction of the bald eagle, Congress passed the Bald Eagle Act (16 U.S.C. §§ 668-668d) to prohibit the take, possession, sale, purchase, barter, or offer to sell, purchase, or barter, export, or import any part of a bald eagle, including their nests and eggs. In 1962, Congress amended the Bald Eagle Act to include golden eagles, recognizing that the declining population of the golden eagle as it was threatened with extinction. The bald eagle continues to be protected by the Bald and Golden Eagle Protection Act even though it has been delisted under the ESA in August 2007 (USFWS, n.d. (a)).

4.2.2 Affected Environment

4.2.2.1 Vegetation

The SMF airport is within the EPA Level III Ecoregion 7 (Central California Valley) and Level IV Ecoregion 7e (Sacramento/Feather Riverine Alluvium) of California (EPA, 2013). Typical vegetation within the Sacramento/Feather Riverine Alluvium includes cottonwoods and mixed willows, along with some grasslands. The xeric soils found in the ecoregion are moderately well to somewhat poorly drained and support pasture, wheat, fruit and nut orchards, and woody wetlands (Griffith, G.E., et al., 2016).

The study area, shown on Figure 1-1, is located in a fairly undeveloped agricultural region north-northwest of downtown Sacramento. The airport is surrounded by farmland, a golf course to the west, and Metro Airpark (business park zoned for industrial, manufacturing, distribution and high-tech commercial use) to the east (Buzz Oats, 2025). The existing ATCT and base building are located between runway 17R/35L to the west and runway 17L/35R to the east and is approximately 4,417 feet south of the proposed new ATCT site. The existing

ATCT site is located approximately 280 feet south of Terminal B and is situated in the curve of Airport Boulevard West. The northeast, southeast, and southwest sides of the existing ATCT and base building are surrounded by gravel and landscaping plants, primarily California lilac (*Ceanothus* sp.), and various weed species such as annual sowthistle (*Sonchus oleraceus*), mallow (*Malva* sp.), and prickly lettuce (*Lactuca serriola*).

The proposed new ATCT site consists of mostly degraded asphalt, gravel, and dirt. The area is regularly mowed and supports scattered non-native plant species. Vegetation found at the proposed new ATCT site consists of unidentified grasses, dock (*Rumex* sp.), plantain (*Plantago* sp.), mustard (*Hirschfeldia* sp.), bindweed (*Convolvulus* sp.), tarweed (*Centromadia* sp.), chamomile (*Anthemis cotula*), and trefoil (*Lotus* sp.). There are no trees, shrubs, buildings, or maintained landscape vegetation within the proposed new ATCT site (Booz Allen Hamilton, 2025a).

Vegetation is managed in compliance with the SMF Wildlife Hazard Management Plan (WHMP). Vegetation management techniques discussed in the WHMP include turf management, a controlled selection of any new vegetative species, minimal herbicide use, and removal of weeds and sagebrush (Sacramento County Department of Airports, 2025).

4.2.2.2 Wildlife and Fish

The majority of the study area is developed and used for airport operations. Other land within the study area is maintained under SMF's WHMP to reduce vegetation and habitat that may attract wildlife. Land north of the proposed new ATCT site within the study area is used for agricultural operations. Due to the previously disturbed nature of the developed area surrounding the existing ATCT and much of the study area is within an active airport, SMF would not be considered desirable, permanent habitat for wildlife. Smaller species, such as insects, reptiles, amphibians, and small mammals, could inhabit open space or structures within the airport and study area. Highly mobile species, such as birds and bats, could be transiently present, but it is unlikely most wildlife would use the proposed new ATCT site as permanent habitat.

The proposed new ATCT site is located on previously disturbed airport property consisting of mostly degraded asphalt, gravel, and dirt. High quality habitat is not present within the proposed new ATCT site. The proposed new ATCT site is surrounded by drainage ditches and one small wetland approximately 220 feet to the north. There are no aquatic resources within the vicinity of the existing ATCT site that would serve as habitat for aquatic wildlife and or fish. The nearest aquatic resource to the existing ATCT is Sacramento River, which is located approximately 2.33 miles and 1.85 miles to the west of the existing and proposed new ATCT sites, respectively. Habitat for fish and other fully aquatic species is not present in the study area (see Section 4.13).

Fauna observed during the June 2025 site visit included cliff swallow (*Petrochelidon pyrrhonota*), northern mockingbird (*Mimus polyglottos*), American white pelican (*Pelecanus erythrorynchos*), red-tailed hawk (*Buteo jamaicensis*), killdeer (*Charadrius vociferus*), Swainson's hawk (*Buteo swainsoni*), pigeon (*Columba livia*), and turkey vultures (*Cathartes aura*) and small grasshopper (*Caelifera*) (Booz Allen Hamilton, 2025a). In addition to these species, airport staff noted the following wildlife have been observed at the airport: black-tailed jackrabbit (*Lepus californicus*), coyote (*Canis latrans*), feral house cat (*Felis catus*), barn

owl (*Tyto alba*), burrowing owl (*Athene cunicularia hypugaea*), California quail (*Callipepla californica*), great egret (*Ardea alba*), peregrine falcon (*Falco peregrinus*), raven (*Corvus coras*), Western kingbird (*Tyrannus verticalis*), and Western scrub jay (*Aphelocoma californica*).

SMF is obligated to comply with the wildlife hazard management requirements, standards, and recommendations made by the FAA in Advisory Circulars. Habitat is managed under SMF's WHMP to maintain a safe operating environment. Management practices include efforts to reduce vegetation and habitat that may attract wildlife. In addition, airport staff monitor all airport structures for wildlife use and attraction and include actions to remove the attraction and/or wildlife. Existing buildings and other structures discourage nesting, perching, or roosting sites for birds (Sacramento County Department of Airports, 2025).

4.2.2.3 Special Status Species

Special status species generally occupy unique or specific habitats, such as riverine forests, wetlands, or native ecosystems. Table 4-2 displays the federally listed species within Sacramento County, California. According to the USFWS Environmental Conservation Online System (ECOS), there are 32 species known to occur in Sacramento County (USFWS, 2025a). A more focused search of the proposed and existing ATCT locations and study area using the USFWS Information for Planning and Consultation (IPaC) identified species included in the county list, although many species in the county list were not within the study area, and are noted Not Applicable (NA) in the table below. No critical habitat is located within the study area. The two USFWS species lists are provided in Appendix A.

The State of California maintains lists of state and federally listed endangered and threatened species of animals and plants for the entire state. According to the California Department of Fish and Wildlife, there are 80 federally listed animal species, 38 state listed animal species, and 62 species listed by both the state and federal agencies (State of California Natural Resources Agency, 2025a). California designated species as "fully protected" prior to the implementation of the ESA; several species still retain this designation if they are not currently identified as federally listed species (State of California Natural Resources Agency, 2025a). There are 65 federally listed plant species, 108 state listed plant species, and 117 plant species listed by both the state and USFWS (State of California Natural Resources Agency, 2025b). California classifies plants as threatened, endangered, or rare. In their WHMP, SMF maintains a list of species observed at the airport. Wildlife species observed at SMF and listed as threatened, endangered, or fully protected are also included in Table 4-2 (Sacramento County Department of Airports, 2025).

A focused search of the study area found seven federally listed species: giant garter snake (*Thamnophis gigas*), Western pond turtle (*Emys marmorata*), Western spadefoot (*Spea hammondi*), monarch butterfly (*Danaus plexippus*), valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), vernal pool fairy shrimp (*Branchinecta lynchi*), and vernal pool tadpole shrimp (*Lepidurus packardi*), listed in Table 4-2 (USFWS, 2025b).

Table 4-2. Federally Listed Species and California Listed Status

Common Name	Scientific Name	Sacramento County Federally Listed Status	Study Area Federally Listed Status	California State Listing Status
Little brown bat	*Myotis lucifugus*	Under Review	NA	NA
Riparian brush rabbit	*Sylvilagus bachmani riparius*	Endangered	NA	Endangered
Bald eagle	*Haliaeetus leucocephalus*	NA	NA	Endangered, Fully Protected
Belding's savannah sparrow	*Passerculus sandwichensis beldingi*	NA	NA	Endangered
California least tern	*Sternula antillarum browni*	Endangered	NA	Endangered
California Ridgway's rail	*Rallus obsoletus obsoletus*	Endangered	NA	Endangered
Golden eagle	*Aquila chrysaetos*	NA	NA	Fully Protected
Least Bell's vireo	*Vireo bellii pusillus*	Endangered	NA	Endangered
Peregrine falcon	*Falco peregrinus*	NA	NA	Fully Protected
Sand Hill crane	*Grus canadensis*	NA	NA	Threatened, Fully Protected
Swainson’s hawk	*Buteo swainsoni*	NA	NA	Threatened
Tricolored blackbird	*Agelaius tricolor*	NA	NA	Threatened
Western snowy plover	*Charadrius nivosus nivosus*	Threatened	NA	NA
White-tailed kite	*Elanus caeruleus*	NA	NA	Fully Protected
Yellow-billed cuckoo	*Coccyzus americanus*	Threatened	NA	NA
Giant garter snake	*Thamnophis gigas*	Threatened	Threatened	Threatened
Northwestern pond turtle	*Actinemys marmorata*	Proposed Threatened	Proposed Threatened	NA
California red-legged frog	*Rana draytonii*	Threatened	NA	NA
California tiger salamander	*Ambystoma californiense*	Threatened	NA	Threatened
Foothill yellow-legged frog	*Rana boylii*	Endangered	NA	NA
Western spadefoot	*Spea hammondii*	Proposed Threatened	Proposed Threatened	NA
Delta smelt	*Hypomesus transpacificus*	Threatened	NA	Endangered
Longfin smelt	*Spirinchus thaleichthys*	Endangered	NA	Threatened
Conservancy fairy shrimp	*Branchinecta conservatio*	Endangered	NA	NA
Vernal pool fairy shrimp	*Branchinecta lynchi*	Threatened	Threatened	NA
Vernal pool tadpole shrimp	*Lepidurus packardi*	Endangered	Endangered	NA
Monarch butterfly	*Danaus plexippus*	Proposed Threatened	Proposed Threatened	NA

Common Name	Scientific Name	Sacramento County Federally Listed Status	Study Area Federally Listed Status	California State Listing Status
Valley elderberry longhorn beetle	*Desmocerus californicus dimorphus*	Threatened	Threatened	NA
Colusa grass	*Neostapfia colusana*	Threatened	NA	Endangered
El Dorado bedstraw	*Galium californicum ssp. sierrae*	Endangered	NA	Rare
Fleshy owl's-clover	*Castilleja campestris ssp. succulenta*	Threatened	NA	Endangered
Ione (incl. Irish Hill) buckwheat	*Eriogonum apricum (incl. var. prostratum)*	Endangered	NA	Endangered
Ione manzanita	*Arctostaphylos myrtifolia*	Threatened	NA	NA
Palmate-bracted bird's beak	*Cordylanthus palmatus*	Endangered	NA	NA
Pine Hill ceanothus	*Ceanothus roderickii*	Endangered	NA	Rare
Pine Hill flannelbush	*Fremontodendron californicum ssp. decumbens*	Endangered	NA	Rare
Sacramento Orcutt grass	*Orcuttia viscida*	Endangered	NA	Endangered
Slender Orcutt grass	*Orcuttia tenuis*	Threatened	NA	Endangered
Soft bird's-beak	*Cordylanthus mollis ssp. mollis*	Endangered	NA	NA
Stebbins' morning-glory	*Calystegia stebbinsii*	Endangered	NA	Endangered

Source: (USFWS, 2025b), (USFWS, 2025a; State of California Natural Resources Agency, 2025a; State of California Natural Resources Agency, 2025b; Sacramento County Department of Airports, 2025)

The giant garter snake (GGS), federally listed as threatened, utilizes aquatic habitat that contains standing or flowing water (or has contained standing or flowing water within the last 15 days) and undisturbed uplands within 200 feet of aquatic habitat (USFWS 1997). Giant garter snakes are active between March and October (USFWS, 2025c). In July 2017, aquatic habitat in the study area was evaluated for GGS suitability (Hansen, E., 2018). The proposed new ATCT site and the existing ATCT and base building are within the lowest ranked area of probability of occupancy for GGS, according to the survey results (Hansen, E., 2018). The drainage ditch located approximately 450 feet north of the proposed new ATCT site was ranked as not expected to support GGS (Hansen, E., 2018). The drainage ditch located just south of the proposed new ATCT site along Delta Road was also determined to lack suitable habitat to support GGS (Hansen, E., 2018). The proposed new ATCT site and the existing ATCT site were determined as low-quality habitat for GGS (Hansen, E., 2018). Land to the north and east of the proposed new ATCT site has increasingly more suitable habitat for GGS. The airport supports a GGS preserve located north of SMF as mitigation for projects that could affect GGS. The SMF WHMP includes protocols for vegetation management that includes surveys and approval of sites where activities are planned to ensure the safety of GGS and other species.

The federally proposed threatened Western pond turtle occupies a variety of aquatic habitats with suitable basking sites and deep pools or submerged structures, such as logs, where it can hide from predators. Irrigation ditches near the proposed new ATCT site likely do not provide suitable aquatic habitat, but the species could utilize upland habitat with sandy soils nearby for nesting (USFWS, 2025d).

The federally proposed threatened Western spadefoot occupy the Central Valley and adjacent foothills in grasslands, and occasionally in hardwood woodlands, orchard, or vineyard habitats. Adult western spadefoot feed on insects, worms, and other invertebrates such as vernal pool fairy shrimp (*Branchinecta lynchi*). Tadpoles consume planktonic organisms, algae, and dead aquatic larvae. Other spadefoot toad species have been known to consume fairy shrimp, which are also a species of concern in the study area (California Department of Fish and Wildlife, 2000).

Adult monarch butterflies, proposed threatened, feed on the nectar of flowering plants and their larva requires milkweed plants to develop (USDA, n.d.). Monarch butterflies only reproduce where milkweed plants are located (USDA, n.d.). The species could use airport habitat for resting or feeding if flowering plants were present. However, no milkweed plants were identified during the proposed new ATCT site visit conducted in June 2025 (Booz Allen Hamilton, 2025a).

Federally listed threatened valley elderberry longhorn beetle are dependent on their host plant, the elderberry (*Sambucus nigra ssp.*), a shrub that grows in riparian areas and foothill oak woodlands in California (USFWS, 2025e). While there are no riparian areas or woodlands within the study area, the Sacramento River is located approximately 2.33 miles and 1.85 miles to the west of the existing and proposed new ATCT sites, respectively. No elderberry plants were observed at the existing ATCT and proposed new ATCT sites (Booz Allen Hamilton, 2025a).

Vernal pool fairy shrimp (threatened) and endangered vernal pool tadpole shrimp are found in vernal pools in California. Both species eat algae, bacteria, protozoa, rotifers, and bits of waste from other plants and animals present in their environments (USFWS, 2025f; USFWS, 2025g). There is one small, seasonal, potential non-jurisdictional wetland identified in a 2024 delineation, approximately 220 feet north of the proposed new ATCT site, although it is not known if this site supports vernal pool invertebrate species nor has the potential wetland been confirmed as non-jurisdictional wetland by the U.S. Army Corps of Engineers (USACE) (LSA Associates, Inc., 2024). According to the USFWS, no vernal pools are located at SMF (USFWS, 2022).

4.2.2.4 Migratory Birds

California is located within the Pacific Flyway for migratory birds through which migrating birds travel as they move from wintering to nesting areas (USFWS, n.d. (b)). The USFWS lists 16 migratory birds that are of particular concern which could be present seasonally within the SMF study area based on the known or extended range of the species (USFWS, 2025b).

Of the 16 species, 14 are "Birds of Conservation Concern,"[9] (BCC) which the USFWS is mandated to identify under the 1988 amendment to the Fish and Wildlife Conservation Act (USFWS, n.d. (c)). Most species have a "probability of being present" within the SMF study area for at least one week a year. Table 4-3 displays when migratory birds have the probability of being present for at least one week in the vicinity of SMF. Some migratory birds are also listed as State of California threatened, endangered, and fully protected species. The state listing status is also included in Table 4-3.

Table 4-3. Migratory Birds

Common Name and California Listing Status	Scientific Name	Highest Probability of Presence (month)
Bald eagle – CA Endangered, Fully Protected	*Haliaeetus leucocephalus*	March
Belding's savannah sparrow (BCC) – CA Endangered	*Passerculus sandwichensis beldingi*	September to April
Black tern (BCC)	*Chlidonias niger surinamenisis*	April
Bullock's oriole (BCC)	*Icterus bullockii*	April to June
California gull (BCC)	*Larus californicus*	November to February
Common yellowthroat (BCC)	*Geothlypis trichas sinuosa*	June, August, September, December
Golden eagle – CA Fully Protected	*Aquila chrysaetos*	September
Long-eared owl (BCC)	*Asio otus*	December
Northern harrier (BCC)	*Circus hudsonius*	July, September to April
Nuttall's woodpecker (BCC)	*Dryobates nuttallii*	November to January; April to September
Oak titmouse (BCC)	*Baeolophus inornatus*	November to February; May, August, September
Santa Barbara song sparrow (BCC)	*Melospiza melodia graminea*	September, November to March
Tricolored blackbird (BCC) – CA Threatened	*Agelaius tricolor*	June, August, September, December
Western grebe (BCC)	*Aechmophorus occidentalis*	November, December
Western screech-owl (BCC)	*Megascops kennicottii cardonensis*	February, June
Yellow-billed magpie (BCC)	*Pica nuttalli*	March to October, December, January

Source: (USFWS, 2025b; State of California Natural Resources Agency, 2025a)

Bald and golden eagles are not BCC in the SMF study area; however, they warrant additional attention due to their inclusion in the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). Based on their known or extended range, bald eagles have a probability of being present in one month of their breeding season, primarily in March. Golden eagles could be migrating or foraging in the area and could have a probability of presence outside of their

[9] Birds of Conservation Concern: "The 1988 amendment to the Fish and Wildlife Conservation Act mandates the U.S. Fish and Wildlife Service to identify species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act (ESA) of 1973" (USFWS, n.d. (c))

breeding season, in September. Bald and golden eagle management guidelines would apply if any nests were observed in the study area (USFWS, 2007b).

Nocturnal species, such as bats or migratory birds, may be sensitive to nighttime light sources which may disrupt migratory or breeding cycles. Existing and future lighting of the airport is discussed in Visual Resources, Section 4.12.2.1.

4.2.2.5 Invasive Species

The California Invasive Plant Council (Cal-IPC) maintains a website with a list of 331 invasive plant species (Cal-IPC, 2025). Invasive plant species can be spread by vehicles, machinery, wildlife, and by natural forces such as wind or water. Areas that are disturbed through construction, by vehicles, or fire may be vulnerable to the introduction and spread of noxious weeds. Invasive plant species can outcompete native plant species and often are not desired forage for herbivorous wildlife species when they spread into native habitat. The proposed new ATCT site supports at least three of the species on the Cal-IPC list, dock (*Rumex* sp.), plantain (*Plantago* sp.), mustard (*Hirschfeldia* sp.), and may support others (Cal-IPC, 2025). Non-native plants observed at the existing ATCT site were not among those on the Cal-IPC list (Cal-IPC, 2025).

4.2.3 Environmental Consequences

The FAA's significance threshold for biological resources would occur when "The U.S. Fish and Wildlife Service or the National Marine Fisheries Service determines that the action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat." (FAA, 2025a)

The FAA does not have a threshold of significance for non-listed species.

- No Impact: Impacts to biological resources (non-listed species) would not occur as a result of the Proposed Action.

Factors to consider when evaluating the context and intensity of reasonably foreseeable environmental impacts for biological resources include if "the action would have the potential for:

- A long-term or permanent loss of unlisted plant or wildlife species, i.e., extirpation of the species from a large project area (e.g., a new commercial service airport);
- Adverse impacts to special status species (e.g., state species of concern, species proposed for listing, migratory birds, bald and golden eagles) or their habitats;
- Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations; or
- Adverse impacts on a species' reproductive success rates, natural mortality rates, non-natural mortality (e.g., road kills and hunting), or ability to sustain the minimum population levels required for population maintenance." (FAA, 2025a)

4.2.3.1 Alternative 1: Proposed Action

The proposed new ATCT and associated parking, base building, and infrastructure would be constructed on a previously cleared portion of the SMF property with minimal existing vegetation consisting of non-native plant species. None of the plant species observed were identified as protected species. Based on the lack of native vegetation and habitat to support native plant species, the construction and demolition activities, including excavation, land clearing, and constructing the Proposed Action would not result in any direct or indirect impacts to vegetation.

Construction of the proposed new ATCT and impacts to special status species habitat from this construction would cause temporary, short-term surface disturbing activities in the span of approximately 13.5 acres involving excavation, increased vehicle traffic, and use of heavy machinery. Soil erosion, contaminant runoff, or spread of non-native invasive plant species could occur during or following the surface disturbing activities and result in indirect effects to habitat from sediment build up, contamination of soil or water, and reduction of habitat quality. Direct impacts to the small, seasonal, potential non-jurisdictional wetland 220 feet to the north of the proposed new ATCT site could occur from vehicles straying off of the project area and could damage the hydrology and integrity of the wetland, including possible habitat value for wildlife. Applying protective BMPs (see Section 4.2.3.3) to prevent inadvertent intersection of vehicles and machinery would prevent direct damage of the wetland. Applying BMPs for erosion, runoff, and the spread of invasive species would reduce or prevent possible impacts to nearby water conveyance ditches and wildlife habitat within the study area. Due to the proposed new ATCT site being located on airport property, surrounded by airport facilities, and on a previously disturbed area (asphalt, gravel, and dirt), high quality habitat for most wildlife species or quality habitat for special status species is not present. Direct impacts to wildlife habitat within the proposed new ATCT and existing ATCT sites are not expected.

Impacts to GGS from the Proposed Action are not expected due to the low quality habitat within the proposed new ATCT and existing ATCT sites; however, implementing measures from the SMF WHMP for GGS and applying appropriate measures from E. Hanson's (2018) *Standard Avoidance and Minimization Measures During Construction Activities in GGS (Thamnophis gigas) Habitat* would provide additional protections for the species during construction and demolition activities (Hansen, E., 2018; Sacramento County Department of Airports, 2025).

Impacts to the western spadefoot and western pond turtle are unlikely due to the lack of habitat for these species within the study area. Indirect impacts from the Proposed Action could occur during or following the surface disturbing activities and result in possible degradation to surrounding habitat from sediment build up, contamination of soil or water, and reduction of habitat quality. Applying BMPs for erosion, runoff, and the spread of invasive species would reduce or prevent possible impacts to habitat within or adjacent to the study area.

Due to the lack of elderberry bushes within the proposed new ATCT and existing ATCT sites, no direct or indirect impacts to the elderberry longhorn beetle are expected from the Proposed Action.

No impacts to the monarch butterfly are expected from the Proposed Action due to the minimal vegetation loss and lack of milkweed plants in the proposed new ATCT and existing ATCT sites. The removal of the landscape vegetation (*Ceanothus* sp.) surrounding the existing ATCT and base building could remove some flowering food sources for adult monarchs, but it is unlikely the amount of forage would affect the overall health of the species.

Although the small, potential non-jurisdictional, seasonal wetland to the north of the proposed new ATCT is not a documented vernal pool or confirmed by the USACE as a wetland, it could support aquatic habitat suitable for the vernal pool fairy shrimp and vernal pool tadpole shrimp. However, no vernal pools were identified within the study area. Surface disturbing activities involving excavation, increased vehicle traffic, and use of heavy machinery could result in soil erosion, contaminant runoff, or the spread of non-native invasive plant species which could indirectly affect the small seasonal wetland. Applying BMPs for erosion, runoff, and the spread of invasive species would reduce or prevent possible impacts to the small seasonal wetland. Direct impacts to the small wetland could occur from vehicles straying off the project area and could damage the integrity of the wetland, including possible habitat value for shrimp species. Applying protective BMPs to prevent inadvertent intersection of vehicles and machinery would prevent direct damage of the wetland. Based on the lack of suitable habitat and protective BMPs to prevent damage and degradation of the wetland, no direct or indirect impacts are expected to the two listed shrimp species.

In consideration of the lack of habitat within the proposed new ATCT and existing ATCT sites and no critical habitat within the study area, the effect determination under the ESA would be 'No effect' for all site-specific listed species listed in Table 4-2. As noted in FAA Order 1050.1G Appendix A and Section 7 of the ESA, consultation is not required for determinations of 'No Effect' (FAA, 2025a) (USFWS, 2007a).

A short-term, temporary increase in noise would occur during the Proposed Action activities, but these impacts are not expected to cause a permanent increase to noise and disturbance to wildlife. As described in Section 4.12, the Proposed Action would result in a change in light emissions due to the new location of the proposed new ATCT and additional height of the tower. The change in light emissions could affect nocturnal species, such as bats or migratory birds, which could be sensitive to the change in nighttime light sources. Applying BMPs to reduce light emissions would prevent disruption of nocturnal species. Construction and demolition activities would occur during daylight hours, limiting overnight light emissions and noise.

The proposed new ATCT site lacks meaningful habitat for migratory bird species to nest, forage, or breed. No impacts to migratory birds are expected from the construction of the proposed new ATCT. Demolition of the existing ATCT and base building could directly affect migratory birds or bats if those species were actively nesting on or within the existing ATCT site. Applying BMPs requiring a nesting survey of the existing ATCT and base building prior to demolition would prevent the loss of nests and species from the removal of the existing ATCT structures.

The increase of human foot traffic, vehicles, and heavy equipment during construction and demolition could introduce noxious weeds and invasive, non-native plant species within and surrounding the construction and demolition sites. The airport actively manages weedy species, which would help to prevent the growth and spread of noxious weeds. Applying BMPs would prevent or reduce the introduction or spread of invasive plant species. See Section 4.2.4 for a list of recommended BMPs.

No significant impacts to biological resources are expected from the Proposed Action due to the overall low quality habitat within the proposed new ATCT and existing ATCT sites and applying BMPs to further protect resources.

4.2.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing biological resources would occur.

4.2.4 Best Management Practices

BMPs that prevent or reduce habitat loss, disturbance of wildlife species, and erosion and runoff to habitat and water bodies would help preclude impacts to biological resources.

Measures for reducing runoff and erosion, as described below, would prevent or reduce sediment, contamination, and the introduction of non-native plant species from degrading wetlands and aquatic habitat. These measures should be implemented within the study area to avoid the potential for temporary construction impacts to adjacent wetlands and surface water.

- Use pervious surfaces and materials that allow water to infiltrate to the soil, where practicable.
- Control runoff, while ensuring the runoff control measures do not attract wildlife hazardous to aviation.
- Control waste and spoils disposal to prevent contaminating ground and surface water, while not attracting wildlife hazardous to aviation (e.g., control the use of pesticides and herbicides, maintain vegetative buffers to reduce sedimentation and delivery of chemical pollutants to the waterbody).
- Limit ground disturbance to the areas necessary for project-related construction.
- Employ erosion control measures to minimize sedimentation of surface waters.
- Restore vegetation, if appropriate, on disturbed areas to prevent soil erosion following project completion.

Protective measures to prevent direct impacts to wetlands near the proposed new ATCT site include:

- Use protective fencing to prevent vehicles from entering wetland areas.
- Surround wetlands and stormwater ditches within 200 feet of excavation sites with silt fence or straw wattles to capture silt and runoff from construction sites.

BMPs to reduce impacts from light emissions include shielding or use of baffles to reduce upward light emissions. In addition, construction and demolition activities would occur during daylight hours, limiting overnight light emissions.

BMPs to protect avian species and bats from the demolition of the existing ATCT and base building include:

- Avoiding demolition of structures during breeding or roosting seasons
- Conducting surveys or the existing structures prior to demolition to ensure no nesting birds or roosting bats are present. If migratory or special status avian or bat species are present, either (a) postpone demolition until young have fledged; or (b) relocate species if appropriate.
- Activities would occur during daylight hours, limiting noise.

Applying BMPs that prevent or reduce the introduction or spread of invasive, non-native plant species, such as use of clean fill, washing of machinery and equipment, or active management of weedy species, would help offset the establishment and spread of non-native plants during and following the construction and demolition activities.

4.3 COASTAL RESOURCES

Coastal resources are the natural resources occurring within coastal waters and adjacent shorelands. Coastal resources include islands, transitional and intertidal areas, salt marshes, wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as fish and wildlife and their respective habitats within these areas.

The SMF airport is landlocked and not adjacent to or near any coastal or inland shorelines, regulated under the Coastal Zone Management Act (CZMA) (16 U.S.C. §§ 1451 et seq.) (NOAA, 2022). Therefore, this resource category is not analyzed further within this Draft Supplemental EA.

4.4 HISTORICAL, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

Historic, and cultural resources are sites, structures, buildings, districts, or objects, associated with important historic events or people, demonstrating design or construction associated with a historically significant movement, or with the potential to yield historic or prehistoric data, that are considered important to a culture, a subculture, or a community for scientific, traditional, religious, or other reasons (NPS, 1997). Historic and cultural resources may be subdivided into the following categories: archaeological resources, architectural resources, Native resources, and Traditional Cultural Properties (TCP).

4.4.1 Regulatory Setting

There are multiple federal regulations that protect historic and cultural resources. NEPA (42 U.S.C. § 4321 et seq.), requires federal agencies to consider the effects of actions on historic and cultural resources (ACHP, 2013).

The National Historic Preservation Act of 1966 (NHPA) (Public Law [P.L.] 89–665, as amended by P.L. 96-515, 54 U.S.C. § 300101 et seq.) directs the federal government to consider the effects of its actions on historic properties listed or eligible for listing in the NRHP under Section 106 through a compliance process, set forth in the law's implementing regulations, 36 CFR Part 800. The NHPA defines historic properties as sites, structures, buildings, districts, or objects that are typically 50 years old, with some younger exceptions, which are significant within their historical context, retain their historical integrity, and are able to convey their significance. It is noteworthy, however, that the law does not necessarily mandate preservation but does mandate a carefully considered decision making process.

Conducting the Section 106 process in coordination with NEPA review of a federal action is an effective way to gather the information needed to assess broad impacts on historical, architectural, archeological, and cultural resources. Steps of the Section 106 compliance process include the following (ACHP, n.d.):

1) Establish whether the Proposed Action constitutes an undertaking. Per 36 CFR Part 800.16, an undertaking is an action funded in whole or in part under the direct or indirect jurisdiction of a federal agency. If the Proposed Action is an undertaking with the potential to affect historic properties, the appropriate State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO) and other consulting parties (stakeholders), such as relevant Tribes, are identified and consulted with on the project in good faith.
2) Identify NRHP-listed or eligible properties. Eligible historic properties in the geographic area of the Proposed Action (also known as the area of potential effects [APE]) are identified and evaluated for significance, including properties potentially eligible or listed with the NRHP that may be affected by the Proposed Action. If historic properties are not present, the federal agency seeks concurrence of the SHPO/THPO in a 30-day review period and makes information available to other consulting parties.
3) Assess effects of the Proposed Action on eligible historic properties. If the assessment determines no historic properties or no adverse effect to eligible historic properties, the SHPO/THPO and other consulting parties are informed and given a 30-day review period. If the assessment determines actual or potential adverse effect to eligible historic properties, the SHPO/THPO and other consulting parties are notified for further consultation.
4) Resolve adverse effects to eligible historic properties through consultation with the SHPO/THPO, Advisory Council on Historic Preservation (ACHP), and other consulting parties, as necessary.

Historic properties are also protected under the U.S. Department of Transportation Act of 1966 (49 U.S.C. § 303) Section 4(f) and its implementing regulations (23 CFR Part 774). If there is a physical taking of a historic property, or adverse effects that substantially impair the affected resource's historical integrity, there may be a "use" under Section 4(f). Refer to Section 4.5 for information on Section 4(f).

Other federal laws and regulations involving consideration of actions that have the potential to impact historic and cultural resources include those that affect:

- Cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (P.L. 101-601, 25 U.S.C. § 3001 et seq.), particularly the inadvertent discovery of Native American cultural items, including human remains, on federal and Tribal lands (43 CFR Parts 1025 and 262.8).
- Religious sites and objects that are important to Native Americans, including Alaska Natives and Native Hawaiians, under the American Indian Religious Freedom Act (AIRFA) of 1978 (P.L. 95–341, 42 U.S.C. § 1996).
- Sacred sites under EO 13007, Indian Sacred Sites (61 *Federal Register* 26771), which requires federal agencies to consult on a government-to-government basis with Tribes if a proposed project involves a sacred site.
- Archaeological resources as defined by the Archaeological Resources Protection Act (ARPA) of 1979 (P. L. 96–95, 16 U.S.C. § 470).
- Archaeological collections, material remains, religious remains, and associated records as defined by 36 CFR Part 79 and EO 13006.

4.4.2 Affected Environment

In accordance with applicable federal laws and regulations, the FAA evaluated the proposed alternatives and APE for historic and cultural resources. The APE is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist" (36 CFR § 800.16(d)). The FAA assessed previously identified cultural resources within the APE and the potential for unidentified resources for each alternative.

Actions that have the potential to affect historic and cultural resources typically involve construction, ground disturbance, or modification of a historic property or a property in the viewshed of a historic property or district. Other effects to consider include noise, vibration, lighting, and increased traffic. Because all actions with the potential to affect historic and cultural resources would occur within the project area, the APE is defined as the area shown on Figure 4-1.

The existing tower at SMF is the 1967, I.M. Pei standard ATCT and base building located at 6520 Alan Boyd Drive. The ATCT cab is only accessible through entry of the base building, and taking the elevator or the concrete, pentagonal staircase. The ATCT is a tall 175-foot pentagonal structural concrete building with a viewing and communications cab at the top. The pentagonal cab uses metal and glass for the space's structure. The ATCT cab has original interior finishings and equipment, and likely original windows.

Due to routine maintenance and regular equipment upgrades, the existing ATCT remains fully operational, as does the base building. As a result, the ATCT retains all aspects of its integrity, including location, setting, association, design, materials, workmanship and feeling.

The airport, existing ATCT, and administrative base building opened concurrently in 1967. SMF was the first purpose-built airport for the public constructed west of the Mississippi River. The construction of the ATCT to coincide at the same time as the airport stresses the integral role the ATCT played in the airport's infrastructure and overall association with patterns of air transportation development and aviation history. The SMF ATCT is one of 17 I.M. Pei standard design towers built.

In 2013, the FAA published a Final EA and FONSI/ROD for the replacement ATCT and administrative base building. The ATCT and administrative base building were under 50 years of age, therefore unevaluated for NRHP. In 2025, Booz Allen Hamilton prepared a report that evaluated the eligibility of the existing ATCT and base building, and two other historic-age resources on SMF airport property for the NRHP. This report serves as the FAA's Section 106 identification and evaluation document pursuant to 36 CFR § 800.4 and supports the FAA's finding of effect determination under 36 CFR § 800.5. The report recommended: (1) the existing SMF ATCT and base building as eligible for the NRHP under Criteria A and C; (2) all remaining surveyed historic-age resources within the APE not eligible for the NRHP under Criteria A, B, C or D; and (3) due to previous ground disturbance within the project area (area of disturbance), no need for an archaeological survey (Booz Allen Hamilton, 2025b).

4.4.3 Environmental Consequences

The FAA has not established a significance threshold for Historical, Architectural, Archaeological, and Cultural Resources. FAA Order 1050.1G, Appendix A notes that "the action would result in a finding of Adverse Effect through the Section 106 process. However, an adverse effect finding does not automatically trigger preparation of an Environmental Impact Statement (EIS) (i.e., a significant impact." (FAA, 2025a)

4.4.3.1 Alternative 1: Proposed Action

As discussed in Section 4.4.2, Booz Allen Hamilton prepared a report that: (1) recommended the existing SMF ATCT and base building as eligible for the NRHP under Criteria A, and C; (2) all remaining surveyed historic-age resources within the APE are recommended not eligible for the NRHP under Criteria A, B, C or D; and (3) due to previous ground disturbance within the project area (area of disturbance), no archaeological survey is recommended (Booz Allen Hamilton, 2025b).

The undertaking would adversely impact the existing SMF ATCT and base building, eligible for the NRHP under Criteria A and C. Per 36 CFR Part 800.5(a)(2)(i), "Physical destruction of or damage to all or part of the (historic) property" constitutes an adverse effect under the NHPA. The demolition of the historic existing SMF ATCT and base building would constitute an adverse effect under Section 106 of the NHPA.

Construction of the proposed new ATCT and demolition of the existing ATCT and base building would occur within previously disturbed areas of the developed airport. Past ground disturbance indicates there is little to no potential for archaeological resources within the proposed new ATCT and existing ATCT sites.

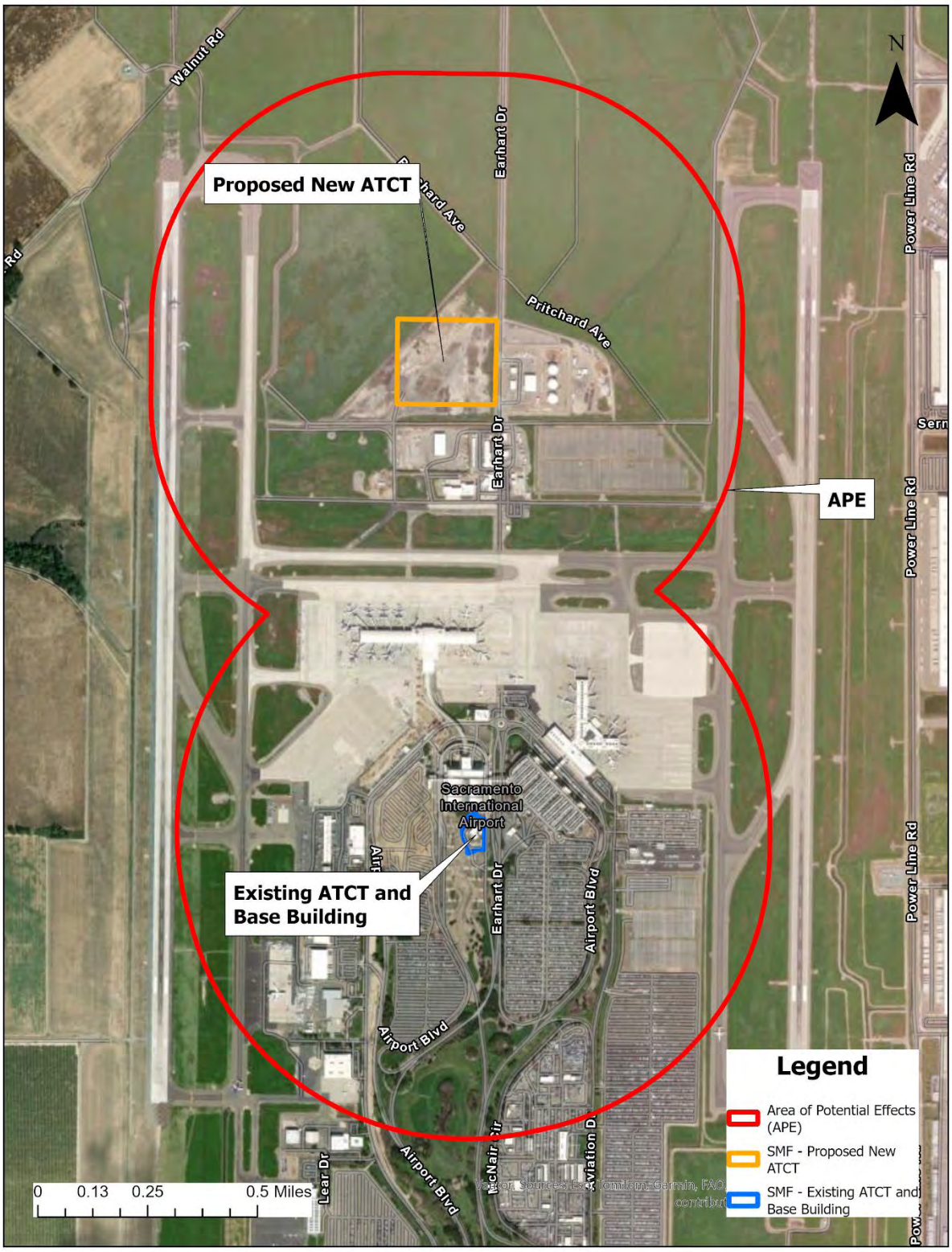

Figure 4-1. Aerial Image of the Area of Potential Effects

Concurrently with the Draft Supplemental EA public notice, the FAA initiated a Section 106 consultation under the NHPA with the California SHPO through notification of the FAA's Finding of Adverse Effect on April 3, 2026. This Section 106 consultation aims to develop and evaluate strategies to avoid, minimize, or mitigate adverse effects to this historic property with identified consulting parties. The FAA also initiated Section 106 consultation with federally and non-federally recognized tribes with known interests or affiliations within the project area and notified them of the FAA's finding on October 21, 2025. The following tribes were consulted: Shingle Springs Band of Miwok Indians; Tsi-Akim Maidu of the Taylorsville Rancheria; United Auburn Indian Community of the Auburn Rancheria; and Wilton Rancheria.

4.4.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing SMF ATCT would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing historical, architectural, archaeological, and cultural resources would occur.

4.4.4 Mitigation

For the Proposed Action, the FAA will coordinate with the California State Historic Preservation Office (SHPO) and the Sacramento County Department of Airports to resolve adverse effects on the existing SMF ATCT by developing and considering alternatives or modifications to avoid, minimize, or mitigate those effects before proceeding with the proposed undertaking. The preliminary proposed mitigation includes developing an interpretive display highlighting the state and local significance of the existing SMF ATCT. Based on feedback from the SHPO, Sacramento County Department of Airports, and other interested consulting parties, additional mitigation may be included. The proposed requirement to develop an interpretive display would be contained within a Memorandum of Agreement (MOA) drafted in cooperation with the signatories, including the California SHPO and the Sacramento County Department of Airports, and will consider input received from consulting parties during the consultation period. Details of this MOA will be shared with the public in the Final Supplemental EA.

4.4.5 Unanticipated Discovery

If unanticipated discovery of cultural resources occurs during project implementation, activities would immediately stop in the area of the resource (FAA, 2025a). The uncovered resources would be protected. In compliance with all applicable laws and regulations, the FAA would consult with the California SHPO and tribes on the discovery. The FAA would consider their recommendations, conduct appropriate actions, and then provide a report of those actions after they are completed (36 CFR § §800.13).

4.5 DEPARTMENT OF TRANSPORTATION ACT, SECTION 4(F) AND SECTION 6(F)

Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1966 (codified in 49 U.S.C. § 303 and 23 U.S.C. § 138) applies to projects that receive funding from or require approval by agencies within the DOT and provides for the consideration of certain properties of national, state, and/or local significance during transportation project development, such as

public owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites.

Before approving a transportation project requiring the use of these properties, the DOT agency must determine that there is no feasible and prudent alternative to using that land and the project includes all possible planning to minimize harm resulting from the use (FAA, 2020a).

In general, actions that have the potential to affect Section 4(f) properties involve a physical or constructive use. A physical use can include temporary occupancy for construction-related activities; physical occupation of the property; alteration of structures or facilities on the property; or a physical taking, such as purchase or a permanent easement of the property (FAA, 2020a). A constructive use involves the project's proximity significantly impacting a Section 4(f) property so the attributes that qualify the property for protection are substantially impaired; this can include the effects of noise, vibration, access restrictions, visual impacts, ecological intrusions, etc. (FHWA, n.d. (a)).

Projects that use Section 4(f) recreation or park areas "must comply with Section 6(f) of the Land and Water Conservation Fund, 16, U.S.C. § 4601-8(f), if the property was acquired or developed with financial assistance under the Land and Water Conservation Fund State Assistance Program" (FAA, 2025a). SMF is not a Section 6(f) property, therefore this resource is not analyzed in this Draft Supplemental EA.

4.5.1 Regulatory Setting

Section 4(f) of the U.S. Department of Transportation Act of 1966 (codified in 49 U.S.C. § 303 and 23 U.S.C. § 138) and its implementing regulations (23 CFR Part 774) provide for the consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development (FHWA, n.d. (a)). In 2005, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Section 6009, amended Section 4(f) to simplify the process and approval of projects having only *de minimis* impacts (or no adverse effects) on 4(f) properties (FHWA, n.d. (b)). Procedures for Section 4(f) compliance are in DOT Order 5610.1C (DOT, n.d.).

Under Section 4(f), the DOT agency is responsible for consulting with the relevant agencies and officials with jurisdiction over the Section 4(f) properties. When a draft Section 4(f) evaluation is prepared, it must be provided to the officials with jurisdiction over Section 4(f) properties, the Department of Interior (DOI), and other agencies, as appropriate, for a minimum 45-day review period. Section 4(f) evaluations and determinations must reflect consultation with these parties. The DOT agency must document evidence of concurrence or efforts to obtain concurrence of federal, state, or local officials having jurisdiction over Section 4(f) properties regarding the project's use plans to minimize harm of the Section 4(f) property (FAA, 2020a).

Section 4(f) intersects with the NHPA. Both Section 4(f) and NHPA's Section 106 mandate the consideration of historic properties, or historic sites listed on or eligible for listing on the NRHP. Coordination between the Section 106 process and Section 4(f) evaluation is effective for project-level NEPA documentation, since the Section 106 process identifies, evaluates, and determines impacts on historic properties within a project area. Section 106 findings

can also support Section 4(f) determinations for historic sites. Please refer to Section 4.10.1 for more information on the Section 106 process.

For historic properties, under Section 4(f), the official having jurisdiction over the Section 4(f) property is the relevant SHPO or, if located on Tribal land, the relevant THPO or appropriate Tribal representative. If the ACHP is involved in Section 106 consultation for a property, the ACHP is also an official having jurisdiction over the Section 4(f) property. If the property is a National Historic Landmark (NHL), the NPS is also an official with jurisdiction over the Section 4(f) property (23 CFR 774.17). Although there is an overlap between Section 4(f) and Section 106, there are key differences. Section 106 identifies historic properties within a project area and considers the project's effects on them, while Section 4(f) considers whether there is a use of historic properties and requires historic sites to be avoided when possible. Please note that an adverse effect finding under the NHPA's Section 106 and a use under Section 4(f) are not the same. Section 4(f) applies to the actual use or occupancy of a historic site, whereas Section 106 assesses adverse effects on historic properties. Unlike Section 106, under Section 4(f), DOT agencies must avoid the use of historic sites when a prudent and feasible avoidance alternative is available. If there is no prudent or feasible alternative to avoid use, the agency must employ planning to minimize harm to historic sites (FHWA, n.d. (a)).

4.5.2 Affected Environment

There are no recreational sites or wildlife refuges identified within the study area (Bureau of Land Management, 2024). According to the Bureau of Land Management (BLM) National Data Viewer, the nearest Section 4(f) resource is Teal Bend Golf Course, approximately 1.05 miles southwest of the proposed new ATCT site and 1.05 miles northwest of the existing ATCT site, and outside the study area. As this golf course is under public use, it is categorized as a Section 4(f) resource. The next closest recreational area is Elkhorn Regional Park, approximately 3 miles southwest of the proposed new ATCT site and 2.25 miles southwest of the existing ATCT site. Neither resource is within the APE analyzed for the Proposed Action.

As described in Section 4.4.2, the existing SMF ATCT and administrative base building are eligible for listing on the NRHP per the integrity aspects and criteria found in 36 CFR § 60.4 under Criteria A and C for its association with early national FAA guidelines in the 1960's for construction and implementation of a NAS and as a well-preserved example of a modern master architect-designed ATCT. Therefore, the SMF NRHP-eligible existing ATCT and NRHP-eligible administrative base building are considered Section 4(f) resources (DOT n.d.(a)).

No historic properties listed on the NRHP are shown within a 1-mile radius of the study area on the NPS NRHP Database. As discussed in Section 4.4.2, aside from the existing ATCT administrative base building, there are no other properties eligible for or listed in the NRHP within the airport property (NPS, 2025a).

4.5.3 Environmental Consequences

Detailed guidance on significance thresholds and effects determinations for Section 4(f) resources impacts can be found in the FAA Order 1050.1G, Appendix A (FAA, 2025a).

- No Impact: Use of a Section 4(f) property would not occur, or such resources are not present.
- Significant Impact: "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.[10] Resources that are protected by Section 4(f) are publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, and publicly or privately owned land from an historic site of national, state, or local significance. Substantial impairment occurs when the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished." (FAA, 2025a)

4.5.3.1 Alternative 1: Proposed Action

The viewshed for the publicly owned Section 4(f) resource, Teal Bend Golf Club, is not within the APE and therefore would not be affected by the Proposed Action. The golf course would remain unchanged throughout the existing ATCT demolition activities and construction of the proposed new ATCT. No impacts to 4(f) resources outside of the APE are expected under the Proposed Action.

The demolition of the existing NRHP-eligible ATCT and NRHP-eligible administrative base building would result in a physical use of the Section 4(f) properties. The FAA has determined that there is no feasible and prudent alternative that would avoid the use of these two Section 4(f) properties. The project includes all possible planning to minimize harm resulting from the physical use, including proposed mitigation requirements under Section 106 of the NHPA that would need to be fulfilled (see Section 4.4.4).

4.5.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing SMF ATCT and base building would not be removed and replaced, and activities associated with the ATCT and base building would remain the same. No impacts to existing DOT Section 4(f) resources would occur.

4.5.4 Mitigation

The FAA prepared a Section 4(f) evaluation and is consulting with the California SHPO during the Section 106 consultation to identify measures to avoid or minimize the harm of impacts before proceeding with the project. The FAA is coordinating with DOI to review the project on the resulting Section 4(f) evaluation. The FAA anticipates the mitigation outlined in the

[10] Minimal physical use does not always equate to de minimis. NEPA practitioners may find it useful to refer to the definition of "use" in 23 CFR § 774.17, where that definition is instructive in relation to the nature of the project under consideration by the FAA. However, because the following definition may not always appropriately address the nature of impacts that are associated with uses of the air space, the definition is not controlling.

draft MOA would inform the Section 4(f) finding in consultation with the DOI (see Section 4.4.4). The Draft Section 4(f) findings are included in Appendix B and the Final Section 4(f) findings and MOA will be included in the Final Supplemental EA.

4.6 FARMLANDS

Farmland is agricultural land considered important and protected by federal, state, and local regulations. Farmland resources are considered to be prime, unique, or of statewide/local importance as defined by 7 CFR Part 657.5. Farmland resources within the study area have remained consistent with the description and analysis in the 2013 *Environmental Assessment – Proposed Airport Traffic Control Tower (ATCT) and Administrative Base Building Construction and Operation, Sacramento International Airport – Sacramento, California*. This resource section is incorporated by reference and can be reviewed in the 2013 Final EA (Jacobsen Daniels Associates, LLC, 2013). Based on analysis in the 2013 Final EA and condition of the existing resources, the Proposed Action would not result in significant impacts to farmland resources.

4.7 HAZARDOUS MATERIALS, SOLID WASTE, AND POLLUTION PREVENTION

A hazardous material is "any substance or material that has been determined to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce" (FAA, 2020b). Hazardous materials include hazardous wastes and hazardous substances, in addition to petroleum and natural gas substances and materials per 49 CFR § 172.101. The Resource Conservation and Recovery Act (RCRA) implementing regulations define a solid waste "as any discarded material that meets specific regulatory requirements and can include such items as refuse and scrap metal, spent materials, chemical by-products, and sludge from industrial and municipal wastewater and water treatment plants." (FAA, 2020b)

Hazardous waste is a type of solid waste defined under the implementing regulations of RCRA (see 40 CFR § 261.3 subpart C-D) that possesses at least one of the following four characteristics: ignitibility, corrosivity, reactivity, or toxicity or is identified in one of four lists, which contains a list of specific types of solid waste that the EPA has deemed hazardous. RCRA imposes stringent requirements on the handling, management, and disposal of hazardous waste, especially in comparison to requirements for non-hazardous wastes (FAA, 2020b).

Pollution prevention describes methods used to avoid, prevent, or reduce pollutant discharges or emissions through strategies such as using fewer toxic inputs, redesigning products, altering manufacturing and maintenance processes, and conserving energy.

4.7.1 Regulatory Setting

The RCRA (42 U.S.C. §§ 6901-6992k) amended the Solid Waste Disposal Act to establish guidelines for hazardous waste and non-hazardous solid waste management activities in the U.S. RCRA also gives the EPA the authority to regulate the generation, storage, treatment, and disposal of waste as well as address environmental problems that could result from

underground storage tanks storing hazardous substances (40 CFR Parts 240-299). The RCRA database is updated regularly with relevant information regarding hazardous and solid waste compliance, and violation notices.

The Toxic Substances Control Act (TSCA) (15 U.S.C. §§ 2601-2697), as amended by the Lautenberg Chemical Safety Act (P.L. 114–182), provides the EPA with the authority to regulate the production, importation, use, and disposal of chemicals defined as toxic, including lead, radon, asbestos, and polychlorinated biphenyls (PCB), that have the potential to cause unreasonable risk of injury to public health or the environment (40 CFR Parts 745, 761, and 763). This Act also mandates the EPA to execute risk-based chemical assessments with clear and enforceable deadlines.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments Re-authorization Act of 1986 and the Community Environmental Response Facilitation Act of 1992 (42 U.S.C. §§ 9601-9675), establishes joint and several liabilities for those parties responsible for hazardous substance releases to pay cleanup costs and establishes a trust fund to finance cleanup costs in situations in which no responsible party could be identified. Enables the creation of the National Priorities List (NPL), a list of sites with known releases or threatened releases of hazardous substances in the United States and its territories, used to guide the EPA in determining which sites warrant further investigation. As conditions of a sale, release, or transfer of federal lands or facilities used to store hazardous materials or where a release or disposal of hazardous materials has occurred, federal agencies must: identify those lands or facilities, and complete waste or contaminate clean-up of these lands or facilities (40 CFR Parts 300, 311, 355, 370, and 373).

The Emergency Planning and Community Right to Know Act (EPCRA), as amended by America's Water Infrastructure Act (AWIA) (42 U.S.C. §§ 11001-11050), requires hazardous chemical emergency planning by federal, state, and local governments, Indian tribes, and industry. EPCRA also requires industry to report on the storage, use, and releases of hazardous chemicals to federal, state, and local governments. The 2018 AWIA revisions require that community water systems receive prompt notification of any reportable release of an EPCRA extremely hazardous substance or a CERCLA hazardous substance that potentially affects their source water and have access to Tier II information (i.e., hazardous chemical inventory data) (40 CFR Parts 350-372).

The Solid Waste Disposal Act, as amended by the Federal Facilities Compliance Act (42 U.S.C. § 6961), waives any immunity otherwise applicable to federal agencies for substantive or procedural requirement in connection with a federal, state, interstate, or local solid waste or hazardous waste regulatory programs (40 CFR Part 22).

The Hazardous Materials Transportation Act (49 U.S.C. §§ 5101-5128) establishes procedures, reporting requirements, and approval processes for the transport of hazardous materials by common, contract, and private carriers and by aircraft, railcar, vessel, and motor vehicle (49 CFR Parts 100-185).

The Oil Pollution Act (33 U.S.C. §§ 2701-2762) requires oil storage facilities and vessels to submit to the EPA plans detailing how the facilities would respond to large oil discharges. EPA has published regulations for aboveground storage facilities. The Oil Pollution Act also

requires the development of Area Contingency Plans to prepare and plan for oil spill response on a regional scale (40 CFR Parts 109-116).

The Pollution Prevention Act (42 U.S.C. §§ 13101-13109) requires pollution prevention and source reduction control so that wastes would have less effect on the environment while in use and after disposal. Source reduction is defined by the EPA as practices that can reduce hazardous substances from being released into the environment prior to recycling, treatment, or disposal (i.e., equipment or technology modifications, product redesign).

Executive Order 12088, Federal Compliance with Pollution Control Standards, directs federal agencies to comply with applicable pollution control standards for prevention, control, and abatement of environmental pollution. EO 12088 also requires agencies to consult with EPA and state and local agencies on the best techniques and methods available for prevention, control, and abatement of environmental pollution (43 *Federal Register* 47707).

The Council on Environmental Quality (CEQ) Memorandum on Pollution Prevention (58 *Federal Register* 6478) and NEPA (42 U.S.C. §§ 4321) provide guidance to federal agencies on incorporating pollution prevention principles, techniques, and mechanisms into planning and decision-making processes and evaluating and reporting those efforts in documents prepared pursuant to NEPA.

4.7.2 Affected Environment

According to a November 2023 Asbestos Facility Re-Inspection Summary, the existing SMF ATCT contains asbestos containing materials (ACM) in media such as floor tiles throughout the ATCT and pipe insulation (FAA, 2023). Given the age of the existing ATCT and base building, it is possible that lead-based paint and PCBs remain present and may be encountered during demolition.

The FAA maintains a Part 139 Airport Certification Status List identifying airports which use or have used military-specification fire-fighting foams that are fluorinated, known as per- and polyfluoroalkyl substances (PFAS) (FAA, 2025e). The presence of SMF on this list indicates that site operations may have handled foams containing PFAS in the past. The FAA historically mandated the use of fluorinated firefighting foams. After 2018, fluorinated foams are no longer mandated; however, the use of these chemicals is not currently prohibited (DOT, 2019). The EPA designated two types of PFAS, known as perfluorooctane sulfonate (PFOS) and/or perfluorooctanoic acid (PFOA), as “hazardous substances” under CERCLA (EPA, 2024; EPA, 2017). PFAS constituents are commonly found in aqueous film forming foam (RFA) which, when sprayed, can permeate soil and groundwater. Hazardous materials, including an Aqueous Film Forming Foam (AFFF) discharge site, within the study area are shown on Figure 4-2.

Following an October 2019 study by RS&H California, Inc. (RS&H) PFAS was found in soil and groundwater at SMF locations identified as being used for aircraft rescue firefighting (ARFF) training. The Central Valley Water Quality Control Board requested additional sampling after reviewing the 2019 study. In order to collect information on the vertical and horizontal extent of PFAS contamination at SMF, soil and groundwater samples were collected for analysis of 31 PFAS analytes. Of the 41 soil samples collected from the

monitoring well borings, perfluorohexanesulfonic acid (PFHxS) was the most abundant constituent detected. Additionally, PFOS, PFOA, and other PFAS compounds were detected above reporting limits. PFOA, perfluorobutanesulfonic acid (PFBS), PFHxS, and PFOS were detected above Central Valley Water Quality Control Board reporting limits in all 24 of the groundwater samples taken. Other PFAS compounds that currently do not have reporting limits were also detected in the groundwater samples above the laboratory quantitation values (RS&H California, Inc., 2024).

A Phase I Environmental Site Assessment (Phase I) at the proposed new ATCT site was completed in 2024 identifying one recognized environment condition (REC) associated with the likely presence of PFAS at an adjoining property approximately 1,000 feet south of the proposed new ATCT and 3,485 feet northwest of the existing ATCT site (see Figure 4-2). It was recommended that a Phase II Environmental Site Assessment (Phase II) be conducted to further investigate the extent of the likely PFAS contamination at the proposed new ATCT site (Booz Allen Hamilton, 2024).

The Phase I audit identified two historic recognized environment conditions (HREC). A previous 2014 Phase I identified these HRECs as RECs (Jacobsen Daniels Associates, LLC, 2014). One of the HRECs was a 1986 underground storage tank (UST) release at the Chevron Bulk Fuel terminal, approximately 1,500 feet south of the proposed new ATCT site and approximately 4,300 feet north of the existing ATCT site (Figure 4-2). Soil and water sampling, tank removal, and remediation occurred in 2021 to clean up the release. The facility received the final Closure/No Further Action (NFA) determination from the Central Valley Regional Water Control Board in 2021 and has therefore met the closure requirements under 40 CFR 280.70 (EPA, 2025a). The other HREC, a 2006 waste oil release, occurred at the SMF maintenance facility, approximately 350 feet south of the proposed new ATCT site and approximately 3,500 feet north of the existing ATCT site (see Figure 4-2). The 1,000-gallon waste oil UST was removed in May 2007, and it was recommended that the soil be left in place. On August 29, 2018, the facility received the final NFA letter from the Sacramento County, Environmental Management Department and has therefore received regulatory closure (Booz Allen Hamilton, 2024).

In 2012, a Phase II was conducted at the proposed new ATCT site to evaluate groundwater and soil conditions and identify any National Pollutant Discharge Elimination System (NPDES) requirements and/or disposal and treatment requirements that could be applicable during the proposed new ATCT construction activities. This Phase II also evaluated groundwater and soil conditions to identify any additional sampling and analysis that may be required for the proposed new ATCT construction activities. No compounds were detected in the composite soil or groundwater at concentrations of concern. The Phase II concluded that no soil or groundwater disposal or treatment requirements were required for the proposed new ATCT construction activities, and no further soil or groundwater analyses were recommended (CDM Smith, 2012).

In 2025, a new Phase II was completed to determine if the likely presence of petroleum constituents (benzene, toluene, ethylbenzene, xylene [BTEX], and lead) and/or PFAS in soil and/or groundwater has adversely affected the proposed new ATCT site. Three soil borings were advanced to 15-17.5 feet below ground surface (bgs). Groundwater was encountered at depths of approximately 10 feet bgs, and temporary groundwater wells were set to sample

shallow groundwater. Soil data from this investigation were compared to EPA residential and commercial/industrial Regional Screening Levels (RSL); exceedances of PFAS were identified in shallow subsurface soils along the eastern boundary of the site and beneath the proposed new ATCT site. Groundwater data from the investigation were compared to EPA Maximum Contaminant Levels (MCL) with exceedances identified in groundwater along the eastern boundary of the site and beneath the proposed new ATCT site (see Phase II Environmental Site Assessment, Appendix C for complete sampling results) (Booz Allen Hamilton, 2025c).

One Toxic Release Inventory (TRI) site is identified approximately 1,600 feet southeast of the proposed new ATCT and 2,800 feet north of the existing ATCT site. This site is registered to Allied Aviation Fueling Co. Inc. and lists ethylbenzene and naphthalene as in use (see Figure 4-2). EPA records show annual releases of at least 50 pounds of each chemical per year, mostly into the air, from 2012 to 2021 (EPA, 2025b; EPA, 2021).

A total of 73 registered hazardous waste generators are within the study area and the 1 mile buffer surrounding the study area. Of these sites, 23 are within the study area and the remaining 50 are within 1 mile of the study area (EPA, 2025b). SMF is a registered large quantity generator of hazardous waste. Hazardous waste is generally stored within the fuel tank farm to the east of the proposed new ATCT site and the airport maintenance facility to the south of the proposed new ATCT site (Jacobsen Daniels Associates, LLC, 2014). There are no violations of concern listed within the study area (EPA, 2025d).

The EPA UST finder online map was reviewed for USTs located in the project area. All USTs must be registered and monitored with the California State Water Resources Board, Division of Water Quality - Underground Storage Tank Program (California Division of Water Quality, 2025). The EPA UST finder online map identified three active USTs within the study area (see Figure 4-2). None of the USTs are present within the existing ATCT or proposed new ATCT sites (EPA, 2025c).

The SMF Maintenance Division operates three active USTs within the study area. These active USTs contain diesel and unleaded gasoline and are located approximately 1,500 feet south of the proposed new ATCT site and 3,000 feet north of the existing ATCT site. There were two reported leaking underground storage tanks (LUST) present within the study area. One waste oil LUST, identified in both Phase Is, was reported in 2006 and received a letter of NFA in 2018. One unleaded gasoline LUST case was closed in 1995 (California State Water Resources Control Board, 2025a). These USTs are now inactive and have been issued regulatory closure (EDR Lightbox, 2025). Due to the inactive and closed nature of the two LUSTs, no further action to remove the LUSTs within the study area is required at this time. There are three active above ground storage tanks (AST) within the study area, located approximately 525 feet east of the proposed new ATCT site and approximately 0.83 miles from the existing ATCT site at Allied Aviation Fueling Co, Inc. No leaks have been recorded associated with these ASTs (Jacobsen Daniels Associates, LLC, 2014).

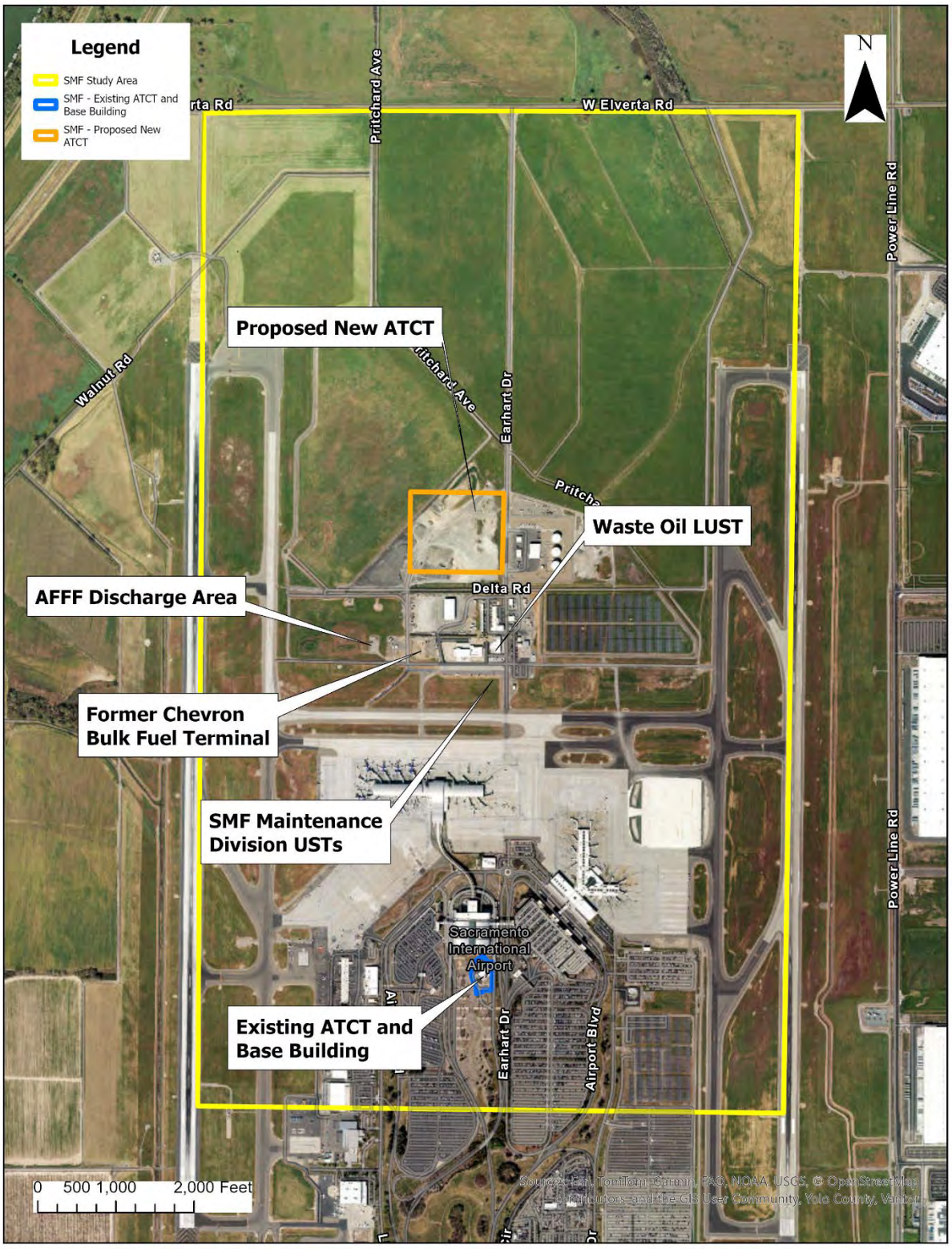

Figure 4-2. Hazardous Materials within the SMF Study Area

4.7.3 Environmental Consequences

The FAA has not established a significance threshold for hazardous materials, solid waste, or pollution prevention (FAA, 2025a).

- No Impact: Impacts from hazardous materials, solid waste, and pollutants would not occur as a result of the Proposed Action.

Factors to consider include if the action has the potential to:

- "Violate applicable Federal, state, Tribal, or local laws or regulations regarding hazardous materials and/or solid waste management;
- Involve a contaminated site (including but not limited to a site listed on the National Priorities List). Contaminated sites may encompass relatively large areas. However, not all of the grounds within the boundaries of a contaminated site are contaminated, which leaves space for siting a facility on non-contaminated land within the boundaries of a contaminated site. Further, construction that does not impact existing caps or ongoing monitoring within contaminated areas may not also result in releases of contaminated material. An EIS may not be required in these instances. See the Desk Reference for mitigating impacts below significant levels (e.g., modifying an action to site it on non-contaminated grounds within a contaminated site). Therefore, if appropriately mitigated, actions within the boundaries of a contaminated site would not have significant impacts
- Produce appreciably larger quantities or increased types of hazardous waste;
- Generate appreciably larger quantities or types of solid waste;
- Use a different method of waste collection, treatment, storage, or disposal that, as an action, would adversely impact the site, surroundings, or affected community, and/or would exceed extant state, Tribal, or local capacity;
- Adversely affect human health and the environment (through activities described in the action and their fidelity with federal, state, Tribal, or local laws or regulations regarding hazardous materials and/or solid waste management)." (FAA, 2025a)

4.7.3.1 Alternative 1: Proposed Action

Demolition of the existing ATCT and base building could expose hazardous materials such as asbestos, lead-based paint, and PCBs. Exposure of these materials could lead to hazardous conditions for workers and the nearby environment. Applying BMPs prior to demolition to identify where these materials are present and enacting plans to safely contain and dispose of these materials could reduce or prevent exposure to these materials and support safe disposal.

Demolition of the existing ATCT and base building could generate solid waste which could include hazardous materials. Solid waste could also be generated by the construction of the proposed new ATCT, which may include building materials and construction waste. Solid waste generated by the Proposed Action would be stored at the proposed new ATCT site in a contractor staging area until the waste can be properly transported off site to a Sacramento

County Hazardous Waste Drop-off Center for disposal in accordance with local, state and federal solid waste disposal guidelines.

Construction of the proposed new ATCT, base building, and associated infrastructure would result in ground disturbance, excavation, and removal of soils from the site. It is unlikely that these activities would intersect with the HRECs, USTs, LUSTs, ASTs, and associated materials within the study due to the distance and location of these areas from the proposed new ATCT site.

Excavation and installation of foundational components at the proposed new ATCT site would disturb subsurface soils at a depth of approximately 12 feet bgs and could possibly interface with the expected groundwater table. If groundwater is encountered, this could lead to contaminant intrusion from the PFAS identified in subsurface soils and shallow groundwater within the proposed new ATCT site. If PFAS contaminated soils are encountered during construction of the proposed new ATCT, a site-specific strategy would be implemented, pursuant to regulatory requirements developed by the California Regional Water Quality Board that would reduce or prevent further spread of these contaminants in the soil. If contaminated groundwater is encountered, the site-specific strategy would be implemented that would reduce or prevent further spread of these contaminants in the groundwater.

There may be short-term impacts to groundwater at the existing ATCT site if hazardous materials are discovered during the demolition and removal of the existing ATCT and base building; however, BMPs are included in Section 4.7.4 to describe an action plan for the proper removal if this were to occur.

The Proposed Action would not disturb RCRA or TRI facilities because the generators are not located at the existing or proposed new ATCT. Construction and demolition activities at the proposed new and existing ATCT sites are not expected to have an impact on the existing TRI or hazardous waste generating facilities.

Construction and excavation equipment would use petroleum products, such as oil, gasoline or diesel fuel, and lubricants. These materials would be handled, stored, disposed of, and managed following FAA, local, state, and federal fuel storage and hazardous material disposal requirements. The Proposed Action would not result in significant impacts from hazardous materials, solid waste, and pollution prevention.

4.7.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be removed and replaced, and activities associated with the ATCT would remain the same.

There are safety concerns for the No Action Alternative of leaving the existing facilities as is.

- The existing ATCT and base building were constructed prior to the banned use of lead-based paint in 1978 (CDC, 2022). Leaving the paint in place would increase the risk of exposure to employees as the paint deteriorates.
- PCBs are defined by the EPA as a group of man-made organic chemicals that consist of carbon, hydrogen and chlorine atoms and were manufactured in several construction and industrial materials from 1929-1979, PCBs pose a similar concern of exposure over time (EPA, 2022c).

- Asbestos is a fibrous mineral that has been used in a variety of building construction materials such as floor tile, insulation, drywall, and siding (EPA, 2022c). Leaving these materials in place would increase the risk of exposure to employees.

Leaving the existing facilities as is could increase the risk of exposure over time if these hazardous materials are present.

4.7.4 Best Management Practices

Measures to avoid or reduce impacts related to hazardous materials, solid waste, and pollutants include the following:

- Inquire with the California Regional Water Quality Board regarding the results of the 2025 Phase II in order to determine if further groundwater monitoring or in-situ waste characterization is needed prior to construction.
- Conduct a Hazardous Materials Survey (HMS) prior to demolition activities and conduct abatement activities, as necessary.
- Implement any on-site treatment, engineering, or administrative controls that may be applied to reduce the hazards posed by wastes encountered.
- Employ safety protocols for workers if hazardous materials are encountered.
- Develop a project specific hazardous materials response plan and/or a spill prevention, control, and countermeasure plan to identify those precautions, training requirements, and response measures that would be taken to prevent and contain releases of hazardous materials.
- Appropriately dispose of soil and groundwater that contain PFAS. Precautions should be implemented during the construction of the proposed new ATCT to limit or eliminate exposures and ensure that waste fluids (including fluids generated during dewatering and runoff) are properly managed and disposed.
- Employ source reduction strategies such as recovering, recycling, or composting waste materials.
- Find markets for recovered, recycled, or composted products, or other wastes that are usable for producing energy or other activities.
- Recycling of construction debris associated with the action.
- Incorporate recommendations provided by federal, state, Tribal, or local agencies responsible for managing any known contaminated sites.

Appropriate measures are required during project execution to alert workers of the potential for contamination and provide guidance for proper notification if a spill or release occurs. In such an event, the site would cease operations until protective measures are implemented and the appropriate regulatory authorities are consulted.

If hazardous materials (oil, gas, petroleum) were required or encountered during construction or demolition, detailed plans would be developed on the handling, storage, disposal, and management of hazardous materials at the construction site and transportation to and from the construction area.

If more than 220 pounds of hazardous waste are expected to be generated, the Department of Toxic Substances Control requires all businesses and large quantity generators to pre-register for disposal (Sacramento County, 2025a).

4.8 LAND USE

Land use is considered within the airport and for the land surrounding an airport. Land surrounding airports may be used in a variety of ways, such as for agriculture, an open space buffer surrounding an airport, industrial use for manufacturing or commercial operations, or residential development. Land use is important when planning airport actions and should consider the existing use of the lands that could be affected by airport operations and projects, and future uses of adjacent lands. Ownership of the land in addition to local, county, state, Tribal, or federal laws and zoning regulations provide direction for how the land may be used or developed.

Land use within the study area has remained consistent with the description and analysis in the 2013 *Environmental Assessment – Proposed Airport Traffic Control Tower (ATCT) and Administrative Base Building Construction and Operation, Sacramento International Airport – Sacramento, California*. This resource section is incorporated by reference and can be reviewed in the 2013 Final EA (Jacobsen Daniels Associates, LLC, 2013). Based on analysis in the 2013 Final EA and condition of the existing resources, the Proposed Action would not result in significant impacts to land use.

4.9 NATURAL RESOURCES AND ENERGY SUPPLY

The term natural resources often refers to finite forms of energy generating materials (coal, natural gas, oil, etc.) that are federally regulated for efficiency and conservation. Natural resources can also refer to water, wood, aggregate, and asphalt.

Public services and utilities are the essential systems that support daily operations in a community and cover a broad array of public services, such as electricity, water, wastewater, and solid waste. Utility lines often cross or run along stream corridors, either overhead or underground. Public services and utilities include fire protection, law enforcement, Emergency Medical Services, schools, water, wastewater, sanitation, solid waste disposal, stormwater drainage, electric utilities, natural gas, and telephone/telecommunications.

There are no specific federal requirements in place to regulate the consumption and use of natural resources and energy supply, it is the policy of the FAA to encourage the development of facilities that exemplify the highest standards of design, including principles of sustainability. All elements of the transportation system should be designed with a view to their aesthetic impact, conservation of resources such as energy, pollution prevention, harmonization with the community and environment, and sensitivity to the concerns of the traveling public (USFWS, 2007a).

4.9.1 Regulatory Setting

The Energy Independence and Security Act (42 U.S.C. § 17001 et seq.) requires federal agencies to take actions to move the U.S. toward greater energy independence and security.

The Energy Policy Act (42 U.S.C. § 15801 et seq.) requires federal agencies to take actions to ensure jobs for our future with secure, affordable, and reliable energy.

4.9.2 Affected Environment

The use of natural resources and energy for this project would involve raw materials, electricity, fuel, and water. Quantities and specific types of materials would be determined closer to construction of the proposed new ATCT, but materials would likely include steel, wood, concrete, asphalt, gravel, sand, glass, polyvinyl chloride (PVC) pipe, sealants, and paint. The materials are not unusual and should be easily sourced from local or regional suppliers.

In 2017, SMF began generating electricity within the study area from two photovoltaic (PV) arrays (Sacramento County, n.d. (c)). The east array is located south of the employee and county vehicle parking lots, east of Aviation Drive and west of Taxiway A. The north array is south of the jet fuel farm and Delta Road, north of Cy Homer Road, west of Taxiway D, and east of Earhart Drive. The two sites combined cover approximately 15 acres and generate approximately 15,550,000 kilowatt hours a year. These PV arrays produce about 35 percent of the electricity used at SMF (Sacramento County Department of Airports, n.d. (a)).

Public services and utilities at SMF consist of water, storm drainage, sanitary sewer, jet fuel, electrical and communications, and natural gas systems. Potable water is provided through the City of Sacramento's water supply. Stormwater surface runoff is captured by a series of open channels and pipes, directed through water quality facilities, such as oil/water separators and sand filters, and then transported toward the southwest of the property to the Airport West Ditch (Environmental Science Associates, 2021). Sacramento Area Sewer District provides wastewater collection services at the Airport.

The Sacramento Municipal Utility District (SMUD) provides electrical service to SMF from two 69 kilovolt lines (one line that follows Elverta Road and one that follows Del Paso Road) and both connect into a SMUD substation (which has automatic transfer capability). Pacific Gas and Electric Company provides natural gas service to SMF. Three main underground pipelines transport natural gas throughout SMF, all at under 60 pounds per square inch of pressure. Jet fuel is delivered to the SMF fuel farm by a 12-inch underground fuel line that runs along Power Line Road (Jacobsen Daniels Associates, LLC, 2020).

On-site water wells are used to provide landscape irrigation and auxiliary water for backup fire suppression. Gasoline and other fuel is stored at SMF facilities for vehicles and on-site combustion engines. Small batteries for vehicles and other various equipment are also used for routine airport facility operations and maintenance (Jacobsen Daniels Associates, LLC, 2013).

4.9.3 Environmental Consequences

As noted in the FAA Order 1050.1G, Appendix A, the FAA has not established a significance threshold for natural resources and energy supply (FAA, 2025a).

- No Impact: Impacts to natural resources and energy supply would not occur as a result of the Proposed Action.

Factors to consider: "The action would have the potential to cause demand to exceed available or future supplies of these resources or adversely impact extant federal, Tribal, state, or local resource planning already in place (e.g., negatively impact energy efficiency, clean or renewable energy, or natural resource or sustainability planning in place in the area of interest by a federal, state, Tribal, or local government entity)" (FAA, 2025a).

4.9.3.1 Alternative 1: Proposed Action

The proposed new ATCT would be constructed with consumable materials that could be locally sourced. Consumption of these natural resources is expected to be stable and is not expected to deplete supplies or have an impact on overall demands of the region. Availability from local suppliers would be considered in the planning stages prior to construction. In the unlikely event that the materials are scarce or unusual, the FAA would identify appropriate alternatives for sourcing the materials. During construction activities, energy, water, and fuel consumption could temporarily increase. To ensure local capacity to sustain this increase, energy managers would be consulted to review demand and usage for the duration of construction activities.

In addition to generated energy, fuel would be used to transport the necessary construction materials and to run the heavy equipment and construction vehicles. Beyond this standard use, it is not expected that a major increase of fuel would be consumed. Demolition and removal of the existing ATCT and base building would require short-term use of machinery and equipment, powered by fossil fuels and electricity. Components of the existing ATCT and base building would be repurposed or recycled whenever possible, reducing waste of resources.

The proposed new ATCT is designed to be thermally efficient and use less energy than the existing ATCT. The proposed new ATCT would also implement efficient plumbing appliances, reducing overall potable water consumption. With completion of the proposed new ATCT, it is likely that long-term beneficial impacts would result because the new ATCT would consume less energy and natural resources. Consumption and impacts to natural resources would be evaluated and monitored prior to and during the Proposed Action. Due to the expected energy efficiency of the proposed new ATCT, applying BMPs, and the short-term use of energy and construction materials, no significant impacts are expected to natural resources and energy resources.

4.9.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be replaced and removed, and energy consumption would remain the same. Outdated materials and design of the existing ATCT and base building would not be able to realize energy efficiency and conservation goals of the new ATCT proposed by Alternative 1.

4.9.4 Best Management Practices

The sustainable design of the proposed new ATCT considers several measures to prevent or reduce impacts to natural resources and energy supply, which include the following:

- Incorporate energy efficient design features when planning new construction, such as all-electric building systems and thermally efficient facades.

- Ensure that vehicle trips are combined or reduced.
- Use repurposed materials or high-recycled steel and metal products.
- Use of energy efficient equipment.
- Use of materials and products free from chemicals known to pose health risks.
- Use of renewable mass timber when usable.
- When feasible, incorporate ground-source heating and cooling.

4.10 NOISE AND NOISE-COMPATIBLE LAND USE

As described in the FAA's 1050.1 Desk Reference, "sound is a physical phenomenon consisting of pressure fluctuations that travel through a medium, such as air, and are sensed by the human ear. Noise is considered unwanted sound that can disturb routine activities (e.g., sleep, conversation, student learning) and can cause annoyance." (FAA, 2020c)

Noise can come from several sources and at varying frequencies and may be continuous or intermittent, persistent, or occasional. Noise and sound share the same physical aspects; however, noise is generally considered a disturbance, whereas sound is defined as a particular auditory effect produced by a given source (e.g., motor running). Sound is interpreted as either pleasant (e.g., bird song) or unpleasant (e.g., jackhammer), depending on the listener's current activity, past experience, and attitude toward the source.

4.10.1 Regulatory Setting

The Airport and Airway Improvement Act of 1982 (49 U.S.C. § 47101 et seq.) authorizes funding for noise mitigation and noise compatibility planning and projects, and establishes certain requirements related to noise-compatible land use for federally funded airport development projects.

The Aviation Safety and Noise Abatement Act of 1979 (49 U.S.C. § 47501 et seq.) directs the FAA to establish, by regulation, a single system for measuring noise and determining the exposure of people to noise; which includes noise intensity, duration, frequency, and time of occurrence; and to identify land uses normally compatible with various noise exposures (14 CFR Part 150).

4.10.2 Affected Environment

Noise sensitive receptors, such as schools and homes, are not located within 1 mile of the study area. The existing ATCT and base building are located over 4.5 miles from a place of worship and over 3.4 miles from two schools. The nearest school, Northlake TK-8 School (2.83 miles southeast of the study area), is located near Interstate 5 (I-5) and Highway 99, two busy north-south highways that could be used by construction vehicles to access surface streets to enter the study area. Construction access and future access to the proposed new ATCT would be through West Elverta Road to Earhart Drive from the north end of the airport property. According to the DOT's National Transportation Noise Map, I-5 and Highway 99 had noise levels averaging between 45.0 to 79.9 dB (DOT - Bureau of Transportation Statistics, 2020). Residents in proximity of SMF are accustomed to ongoing noise emissions from the airport property due to traffic on I-5 and Highway 99 and aircraft overhead. SMF

actively addresses noise concerns through programs to monitor aircraft at the airport, by measuring noise levels outside of the airport, and via their noise website (Sacramento County Department of Airports, n.d. (b)).

4.10.3 Environmental Consequences

For some noise analyses, it is necessary to include noise sources other than aircraft departures and arrivals. Here, the relevant noise to consider is construction noise. FAA Order 1050.1G includes significant thresholds for noise related to aircraft operations at an airport; however, the FAA does not have a threshold of significance for construction noise. According to the previous FAA Order 1050.1F, a noise sensitive area is "an area where noise interferes with normal activities associated with its use. Normally noise sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas, areas with wilderness characteristics, wildlife refuges, and cultural and historical sites." In general, special consideration needs to be given to the evaluation of the significance of noise impacts on noise sensitive areas within Section 4(f) properties (including, but not limited to, noise sensitive areas within national parks; national wildlife and waterfowl refuges; and historic sites, including TCPs) where the land use compatibility guidelines in 14 CFR Part 150 are not relevant to the value, significance, and enjoyment of the area in question. For example, the DNL 65 dB threshold in the guidelines does not adequately address the impacts of noise on visitors to areas within a national park or national wildlife and waterfowl refuge where other noise is very low and a quiet setting is a generally recognized purpose and attribute, and due to the nature of the resource has limited options for mitigation.

4.10.3.1 Alternative 1: Proposed Action

A temporary increase in noise generation would be expected with construction and demolition activities involved with the Proposed Action. Noise associated with demolishing and constructing a new ATCT would be the highest at the construction and demolition sites and along access roads leading to and from the sites. Additional noise sources would likely include the presence and operation of construction vehicles, operation of construction and demolition equipment on site, and the operation of generators as power sources. Noise levels would temporarily exceed natural (ambient) sounds but would not exceed typical noise levels produced by heavy equipment (construction vehicles). The short-term, temporary increase in construction noise would take place during daytime working hours and avoid early morning and evening hours. Major concerns would not likely be raised by stakeholders or nearby residential communities due to the ongoing presence of noise and vehicle traffic at SMF.

Once construction of the new ATCT is complete, it is expected that noise would return to levels equivalent to those prior to demolition and construction. Noise due to air traffic control employee vehicle access would remain at existing levels but be relocated from Airport Boulevard and Earhart Drive (south) at the existing ATCT and base building to the proposed new ATCT site using Earhart Drive (north) and West Elverta Road. The proposed new ATCT would not change the flight operations (number of arrivals or departures), fleet mix, flight paths, or landing or takeoff procedures at SMF airport and would not lead to increased noise levels.

The proposed new ATCT and existing ATCT sites are not located near any wildlife refuges or historic sites that could be impacted by an increase in noise. No significant long-term noise impacts from construction or demolition activities would occur. Overall, based on the temporary nature of the Proposed Action and implementation of BMPs, no significant impacts from noise are expected.

4.10.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be replaced and removed, and ATCT activities would remain the same. Noise levels would remain the same as current conditions. The No Action Alternative would not change existing noise conditions or impact surrounding areas. The No Action Alternative would not require any construction or demolition activities. No impacts of noise would occur from the No Action Alternative.

4.10.4 Best Management Practices

Measures to reduce or prevent impacts from noise include the following construction related actions:

- Construct noise barriers or acoustic shielding to mitigate ground-level noise.
- Use of proper mufflers for construction equipment.
- Limit construction activities to daytime hours.
- Apply measures to limit noise from machinery or trucks as they traverse streets in noise sensitive areas.

4.11 SOCIOECONOMICS AND CHILDREN'S HEALTH AND SAFETY RISKS

The socioeconomics of a project encompass economic or social aspects, or a combination of both. Elements such as employment, housing, population, and public services are socioeconomic attributes considered in a NEPA document (FAA, 2025a).

4.11.1 Regulatory Setting

The Uniform Relocation Assistance and Real Property Acquisitions Policy Act of 1970 (42 U.S.C. § 61 et seq.) contains provisions that must be followed if acquisition of real property or displacement of people would occur as a result of implementing the selected alternative (49 CFR Part 24).

EO 13045, Protection of Children from Environmental Health Risks and Safety Risks (62 *Federal Register* 19885), directs federal agencies to analyze their policies, programs, activities, and standards for any environmental health or safety risks that may disproportionately affect children. Included in these categories are risks to health or safety that are attributable to products or substances that a child is likely to encounter or ingest, such as air, food, water, recreational waters, soil, or products they might use or be exposed to.

4.11.2 Affected Environment

SMF is located in the northwest corner of Sacramento County (Figure 4-4). Sacramento County encompasses approximately 984 square miles with approximately 1.6 million

residents in 2025 (Sacramento County, 2025b). Major types of employment in the county include hospitals and healthcare, state government, aerospace and semiconductor manufacture, utility contractors, real estate, and education (State of California Employment Development Department, 2025). The City of Sacramento is the capital city of California and is also the seat of Sacramento County (Sacramento County, n.d (a)). In January 2025, the city of Sacramento had a population of 527,979 (Sacramento County, 2025b).

Figure 4-3. Sacramento and Surrounding Counties

The study area is located within the SMF property, on land owned and managed by Sacramento County. No private residences, schools, daycares, or hospitals are within the study area or within 1 mile of the study area (EPA, 2025b). Other than the existing ATCT and base building, no other structures are proposed to be removed or demolished. The land surrounding the study area is primarily agricultural, although several businesses are located directly east of SMF, interspersed with agricultural operations. Further east is continued agriculture with new residential development in the Northlake neighborhood to the east-southeast, approximately 1.25 miles from the perimeter of the study area. Scattered homes are present to the west which are located along the Sacramento River and within agricultural lands. A fire station is located at SMF, and Sacramento Fire Department 3 is located approximately 4 miles west of the airport.

Approximately 28 people reside within 1 mile surrounding SMF and the study area. The area beyond the 1 mile buffer to the north, south, and west continue with low population density between 0 to 221 people per square mile. Beyond the 1-mile buffer in the residential

neighborhoods to the east-southeast, the estimated population density increases from 1,539 to 13,404 people per square mile (Public Environmental Data Partners, 2025a).

The percentage of the population who are considered low income within a 1-mile buffer surrounding the study area is approximately 4% and have a very low unemployment rate of 0%. No children under 5 years old are within 1 mile of the study area, 18% are over age 64, and 100% are white or non-Hispanic (Public Environmental Data Partners, 2025b).

Existing conditions which could lead to health effects to children include airborne contaminants, cancer causing and other harmful chemicals, and contaminated water. Within the study area and 1 mile surrounding the study area, several possible items of concern for children may be present.

As described in Section 4.1, the study area and 1-mile buffer surrounding the study area is a non-attainment area for Ozone (1-hr 1979 standard; 8-hr 1997, 2008, and 2015 standard) and $PM_{2.5}$ (24-hr 2006 standard) and a maintenance area for PM_{10} (1987 standard). The Sacramento River, within 1 mile of the study area, is identified as an impaired stream with mercury, pesticides, PCBs, temperature, and total toxics present (EPA, 2025b).

As detailed in Section 4.7, one TRI site is identified within the study area, which lists ethylbenzene and naphthalene as in use. Both chemicals are traced to cancer and other health effects. EPA records show annual releases of at least 50 pounds of each chemical, mostly into the air, from 2012 to 2021 (EPA, 2025b; EPA, 2021). A total of 73 hazardous waste RCRA facilities are within the study area and the 1 mile buffer surrounding the study area. Of these sites, 23 are within the study area and the remaining 50 are within 1 mile of the study area (EPA, 2025b).

4.11.3 Environmental Consequences

Effects to socioeconomics and children's environmental health and safety risks would vary due to the location of the airport and the existing conditions surrounding the location. Site-specific analysis would identify if any significant effects could occur.

The FAA has not established significance thresholds for socioeconomics and children's environmental health and safety risks; however, the FAA has identified factors to consider when evaluating the context and intensity of reasonably foreseeable environmental impacts for socioeconomics and children's environmental health and safety risks. The determination that significant impacts exist in the socioeconomic impact category is normally dependent on whether the potential socioeconomic impact(s) are interrelated with or inseparable from a physical or natural environmental effect. Note these factors are not intended to be thresholds. If these factors exist, there is not necessarily a significant impact; rather, the FAA must evaluate these factors considering context and intensity to determine if there are significant impacts.

The FAA has also identified factors to consider when evaluating the context and intensity of reasonably foreseeable environmental impacts for children's environmental health and safety (FAA, 2025a).

- No Impact: Impacts to socioeconomics and children's environmental health and safety would not occur as a result of the Proposed Action.

Factors to consider that may be applicable to socioeconomic resources, if they are interrelated with natural or physical environmental impacts (see 40 CFR § 1508.14), include, but are not limited to, situations in which "the action would have the potential to:

- Disrupt or divide the physical arrangement of an established community.
- Cause extensive relocation when sufficient replacement housing is unavailable.
- Cause extensive relocation of community businesses that would cause severe economic hardship for affected communities.
- Disrupt local traffic patterns and substantially reduce the levels of service of roads serving an airport and its surrounding communities.
- Produce a substantial change in the community tax base." (FAA, 2025a)

The factor to consider that may be applicable to children's environmental health and safety is when "the action would have the potential to lead to a disproportionate health or safety risk to children" (FAA, 2025a).

4.11.3.1 Alternative 1: Proposed Action

Under the Proposed Action, a slight increase in local employment could occur during construction; however, the workforce could originate from existing businesses with current employees, having a minimal effect on local employment levels. Expenditures to local economies and businesses could show a slight increase during the implementation of construction of the proposed new ATCT, with purchases of materials, fuels, and equipment from the local area. Construction of the new ATCT and demolition of the existing ATCT and base building would likely have minor short-term increases in employment and local expenditures until the activities are complete. No permanent jobs are expected to result from the Proposed Action.

Temporary, minor increases of construction vehicle noise and traffic may occur during daytime hours but would be less than significant due to the project being located on an active airport. Operation and staffing of the proposed new ATCT would be the same or similar to previous conditions. The Proposed Action would not cause the relocation of residences, businesses, hospitals, or schools.

Construction and demolition activities could unearth or disturb hazardous materials. Applying BMPs described in Section 4.7.4 would prevent or reduce possible effects from hazardous materials during construction and demolition activities. No long-term effects or significant impacts to socioeconomics and children's environmental health and safety risks would occur.

4.11.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be replaced and removed, and activities would remain the same. No changes would occur to the existing socioeconomic and children's environmental health and safety risk conditions. No impacts to socioeconomics or children's environmental health and safety risks from the No Action Alternative would occur.

4.12 VISUAL EFFECTS

Visual effects are considered under two categories: light emissions and visual resources/character. Light emissions from outdoor lighting in parking lots, streets, and within businesses or homes affect the darkness of the night sky, particularly in rural areas where fewer light sources are present. Visual character is the overall description of an area, such as rural, farmland, urban, coastal, or mountainous (FAA, 2020d).

4.12.1 Regulatory Setting

There are no special purpose laws or requirements for visual effects. Some visual resources are protected under federal, state, or local regulations. Protected visual resources may include, but are not limited to:

- Federal, state, or local scenic roadways/byways.
- Wild and scenic rivers.
- National scenic areas.
- Scenic easements.
- Trails protected under the National Trails System Act or similar state or local regulations.
- Biological resources.
- Parks, recreation areas, and wildlife/waterfowl refuges.
- Historic properties.
- Features protected under other federal, state, or local regulations (FAA, 2020d).

4.12.2 Affected Environment

The airport is located within an unincorporated area of Sacramento County, west of the City of Sacramento jurisdictional boundary (Sacramento County, 2025c). The proposed new ATCT site is located approximately 4,417 feet north from the existing ATCT and is positioned in the northern portion of the study area on existing airport property (Figure 1-1). The surrounding area to the north is characterized as agricultural with mowed vegetation to the west between the proposed ATCT site and Taxiway A, adjacent to Runway17R/35L. To the east is a paved parking area adjacent to a fuel storage facility, and further east is mowed vegetation, Taxiway D, and Runway 17L/35R.

The existing ATCT and base building are adjacent to Airport Boulevard and other roads, airport structures and facilities, and parking lots with Concourse B directly to the north. The closest sensitive receptors are Teal Bend Golf Club to the west and the Northlake neighborhood to the southeast. The landscape is relatively flat with only a gradual increase of approximately 5 feet from the proposed new ATCT site to Teal Bend Golf Club and consistent elevation toward the Northlake neighborhood. The surrounding landscape is generally agricultural fields with some industrial facilities directly east of the airport along Power Line Road.

4.12.2.1 Light Emission

The proposed new ATCT site is within an undeveloped area where overhead lighting is absent. The land to the north of the proposed new ATCT site does not have existing lighting.

The fuel farm to the east of the proposed new ATCT site and the fire station and offices directly south of the site have exterior lighting and illuminated parking lots.

The existing SMF ATCT operates 24 hours a day, 7 days a week. The existing ATCT site has exterior lights on the base building and overhead lights in the parking lot which are illuminated overnight. Other light emissions at SMF are from runways, taxiways, navigational aids, apron areas, parking lots, FBOs, terminal buildings, the fire station, roadways, and other airport facilities and businesses. The airport is located adjacent to I-5, a major north-south transportation corridor. Exit ramps from I-5 to SMF are illuminated with overhead lighting, as are the surface roads accessing the airport.

The nearest sensitive receptor is the Teal Bend Golf Club, approximately 1.0 mile to the southwest of the proposed new ATCT and approximately 1.0 mile northwest of the existing ATCT. The golf course ranges approximately 1 to 10 feet higher in elevation than the proposed new ATCT site. The perimeter of the golf course is vegetated with trees, obscuring the view of SMF. The next nearest sensitive receptor is the Northlake residential neighborhood, located approximately 2.2 miles southeast of the proposed new ATCT site and 1.9 miles southeast of the existing ATCT site. The existing ATCT is visible from surface roads near the Northlake neighborhood and could be visible from some of the westernmost residences.

Some wildlife may be sensitive to nighttime lighting, such as bats and migratory birds. Impacts to wildlife from nighttime light emissions are analyzed in Section 4.2.3.1.

4.12.2.2 Visual Resources and Visual Character

Most of the lands surrounding the study area are characterized and zoned as agricultural (Sacramento County, 2025c). The area east of SMF and Powerline Road, between Elverta Road to the north, I-5 to the south, and Metro Air Parkway to the east, is a Special Planning Area, with the majority of parcels zoned as Light Manufacturing and Distribution District and Airport Manufacturing and Distribution District (Sacramento County, 2025c). Lands further southeast of the airport are zoned industrial and residential (Sacramento County, 2025c).

Other features within the study area include active runways and taxiways, two airport terminals and concourses, maintenance buildings, a fuel farm, fire station, aircraft storage hangars, and FBO buildings. At this time, the tallest structure within the immediate viewshed of the airport is the existing ATCT itself, with a total height of 175 feet AGL. Once constructed, at 190 feet AGL, the proposed new ATCT would be the highest structure in the area.

As described in the previous section, the nearest sensitive receptor is the Teal Bend Golf Club, and the next nearest sensitive receptor is the Northlake residential neighborhood. The tress surrounding the golf club obscure direct views of SMF and the existing ATCT from most locations within the course. The existing ATCT is visible from surface roads near the Northlake neighborhood and could be visible from some of the westernmost residences.

4.12.3 Environmental Consequences

The FAA has not established a significance threshold for visual effects. The factors listed below may be considered when determining impacts from light emissions and to visual resources and visual character.

- No Impact: Impacts to visual effects would not occur as a result of the Proposed Action.

For light emissions, factors to consider include the extent the action has the potential to:

- "Create annoyance or interfere with normal activities from light emissions; and
- Affect the visual character of the area due to the light emissions, including the importance, uniqueness, and aesthetic value of the affected visual resources." (FAA, 2025a)

For visual resources and visual character, factors to consider include the extent the action has the potential to:

- "Affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources.
- Contrast with the visual resources and/or visual character in the study area.
- Block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations." (FAA, 2025a)

4.12.3.1 Alternative 1: Proposed Action

The Proposed Action would involve construction of the proposed new ATCT, base building, and parking lot on previously cleared airport property. Although areas surrounding the proposed new ATCT site have existing nighttime lighting, the new lighting for the parking lot and exterior of the buildings would result in an increase in light emissions. Applying BMPs for lighting design and color would reduce the upward direction of light and help reduce the overall impacts of light emissions to the immediate surrounding area. Based on the distance from the airport and the overall existing light sources at SMF, it is unlikely that the sensitive receptors would experience a noticeable increase in nighttime light emissions from the Proposed Action.

Wildlife, especially nocturnal species, may be sensitive to nighttime light sources which may disrupt migratory or breeding cycles. As mentioned in Section 4.2.2, the light-sensitive little brown bat is identified as species of concern within the study area, in addition to numerous bird species. Applying BMPs to prevent or reduce overall light emissions and directing nighttime lighting downward could reduce disruptive light sources and impacts to migrating or breeding wildlife. Overall, the Proposed Action would not result in significant impacts from light emissions.

Changes to visual resources and visual character from construction of the proposed new ATCT and removal of the existing ATCT and base building would not affect or obstruct visually important resources. Although the new proposed ATCT height (190 ft AGL) would be approximately 15 feet AGL higher than the existing SMF ATCT, it would not contrast with

the area's overall visual character upon completion due to the area being an active airport. However, the new proposed ATCT site is north of SMF's existing terminals and facilities, the new location would be a change to the overall viewshed due to the location and updated tower design. In addition, the reflective surfaces of the proposed new ATCT could alter the visual character and viewshed. The closest sensitive receptor, Teal Bend Golf Club, would likely receive minimal to no effects from the shift in location of proposed new ATCT, base building, and parking area due to the viewshed being obscured by trees. The line of sight between the Northlake residential neighborhood and proposed new ATCT is not obscured by trees but could be partially or completely obscured by existing or future industrial buildings in the Special Planning Area. The current viewshed includes SMF, and although there would be a change to the viewshed due to the new location and design of the proposed new ATCT, the overall form and function of the landscape would be similar to the existing conditions. Impacts from the Proposed Action would not conflict with the existing viewshed and overall visual resources and would be minimal to the sensitive receptors and surrounding landscape.

4.12.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing visual resources would occur.

4.12.4 Best Management Practices

BMPs that could be applied to reduce impacts to visual resources from light emissions include shielding or use of baffles to reduce upward light emissions.

4.13 WATER RESOURCES

Water resources encompass wetlands, floodplains, surface water, groundwater, and wild and scenic rivers. These resources provide drinking water, irrigation, and other water uses for communities, in addition to recreation and transportation opportunities, and habitat for vegetation and wildlife species.

4.13.1 Regulatory Setting

The Clean Water Act (33 U.S.C. §§ 1251-1387) establishes the basic structure for regulating the discharge of pollutants into waters of the United States and the NPDES permit program.

The Fish and Wildlife Coordination Act (16 U.S.C. §§ 661-667d) requires federal agencies to consult with the USFWS, NMFS, and appropriate state fish and wildlife agencies regarding the conservation of wildlife resources when proposed federal or applicant projects may result in control or modification of the water of any stream or other water body (including wetlands).

EO 11990, Protection of Wetlands (42 *Federal Register* 26961), requires federal agencies to "avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative." The stated purpose of

EO 11990 is to "minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands."

DOT Order 5660.1A, Preservation of the Nation's Wetlands, implements the guidelines set forth in EO 11990. Transportation facilities should be planned, constructed, and operated to ensure the protection and enhancement of wetlands to the fullest extent practicable.

EO 11988, Floodplain Management (42 *Federal Register* 26951), requires federal agencies to avoid, to the extent possible, the long and short-term adverse impacts associated with the occupancy and modification of 100-year floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.

DOT Order 5650.2, Floodplain Management and Protection, implements the guidelines set forth in EO 11988. This DOT Order states that DOT agencies should ensure that proper consideration is given to avoid and mitigate adverse floodplain impacts in agency actions, planning programs, and budget requests.

The Safe Drinking Water Act (42 U.S.C. §§ 300(f)-300j-26) prohibits federal agencies from funding actions that would contaminate any EPA-designated sole source aquifer or its recharge area (40 CFR Parts 141-149).

The Wild and Scenic Rivers Act (WSRA) (16 U.S.C. §§ 1271-1287) preserves certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations and established the National Wild and Scenic River System, which consists of those rivers and river segments deemed by Congress to have one of more "outstandingly remarkable" scenic, recreational, geologic, fish and wildlife, historic or cultural values. Rivers in the system are classified based on the degree of development present along the river, and whether the river is wild, scenic, or recreational.

California-specific laws and policies that apply to water resources include the following:

- The California State Water Resources Control Board (SWRCB) oversees the water quality management across the state by implementing regulations and programs to protect water resources and public health. The SWRCB develops and enforces regulations, including setting contamination standards and monitoring compliance (California State Water Resources Control Board, 2025b).
- The Porter-Cologne Water Quality Control Act established guidelines for maintaining water quality standards and regulating pollution in surface and groundwater. The State Water Board develops water quality control plans to preserve water integrity (Legal Clarity California, 2024).

4.13.2 Affected Environment

4.13.2.1 Wetlands

No wetlands were observed within the proposed new ATCT site; however, a small isolated, seasonal wetland, which was dry at the time of observation in June, was pointed out by airport personnel outside of the perimeter of the site (Booz Allen Hamilton, 2025a). According to a 2024 airport sponsored wetland delineation report, this is a 0.04-acre potential non-jurisdictional wetland located approximately 220 feet north of the proposed new ATCT site (LSA Associates, Inc., 2024). This small potential wetland is not shown on

current USFWS National Wetland Inventory maps. Until USACE concurs with the findings of the wetland delineation, jurisdictional and non-jurisdictional determinations are noted as "potential" for these features. This potential wetland met the vegetation and hydrology wetland features (LSA Associates, Inc., 2024). Figure 4-5 displays the potential wetlands identified during the 2024 wetland delineation and Figure 4-6 includes the wetlands identified on the USFWS wetland mapper.

Several linear drainage ditches and canals are located within the study area (USFWS, 2025h). Some of these features have been identified as potential jurisdictional waters, see Figure 4-5. The closest confirmed jurisdictional ditch is approximately 235 feet north-northeast of the boundary of the proposed new ATCT site (LSA Associates, Inc., 2024; USFWS, 2025h). The USFWS Wetland Inventory mapper shows the nearest non-linear wetland as a 1.11-acre Freshwater Forested/Shrub Wetland located 1,900 feet east of the proposed new ATCT site within the study area (Figure 4-6); however, this location was not identified as a potential wetland during the 2024 delineation (USFWS, 2025h; LSA Associates, Inc., 2024).

4.13.2.2 Floodplains

According to the Flood Insurance Rate Map (FIRM) for the airport location, the Proposed Action is in a special flood hazard area, Zone A99 without base flood elevation, which is defined by the Federal Emergency Management Agency (FEMA) as an area protected by a federal protection system such as levees, dams, or dikes. (FEMA, 2023).

4.13.2.3 Surface Water

There are no man-made or naturally occurring ponds or lakes within the study area. The Sacramento River is located approximately 1.15 miles to the northwest of the proposed new ATCT site and approximately 1.75 miles northwest of the existing ATCT site. This river is identified as an impaired stream with mercury, pesticides, PCBs, temperature, and total toxics present (EPA, 2025b).

The study area is within Reclamation District 1000 (RD 1000) within the Natomas Basin surrounding the Sacramento River. The airport is surrounded and transected by drainage ditches leading to detention pond at the southern end of the airport property, outside the study area. These drainage ditches are part of the drainage system to convey storm runoff from the study area. Storm drains and detention basins at the southern end of SMF hold and deliver runoff to RD 1000 ditches. The RD 1000 ditches are conveyed to pump stations and pumped to an outlet at the Sacramento River located approximately 1.24 miles to the west of the proposed new ATCT site and approximately 1.80 miles from the existing ATCT site (LSA Associates, Inc., 2024).

The airport maintains a Storm Water Pollution Prevention Plan (SWPPP) "to address permitting of stormwater discharges associated with industrial activity at SMF". This plan describes the existing conditions of the stormwater system and provides BMPs to prevent or reduce stormwater pollution at SMF. Minimum BMPs described in the SWPPP are routinely applied by SMF personnel and airport tenants to maintain stormwater quality (Environmental Science Associates, 2021).

The SMF SWPPP describes drainage as separated into a northern, western, and an eastern watershed with five major drainage ditches and one irrigation canal. These ditches function

as drainage ditches and are connected to other ditches in the drainage network that flow to the RD 1000 which pumps water into the Sacramento River. SMF and various airport tenants maintain several oil/water separators located throughout the study area and are a component of the stormwater drainage system. The existing ATCT site and central portion of the airport drain south towards the West Lindberg Ditch. The proposed new ATCT and area surrounding the site drain east toward the P-Drain ditch (Environmental Science Associates, 2021).

4.13.2.4 Groundwater

The 2012 Phase II advanced three borings at the proposed new ATCT site to groundwater and collected grab groundwater samples before abandoning the boring (CDM Smith, 2012). The presumed groundwater flow is south/southwest toward the Sacramento River. At the time of the 2025 Phase II, the depth to groundwater was determined to be approximately 9.5-10 feet bgs (Booz Allen Hamilton, 2025c).

The greater Sacramento area sources water from the Sacramento River, reservoirs, wells, and aquifers. SMF is not located on any sole source aquifers. The nearest aquifer is the Central Valley Aquifer System located approximately 5.34 miles to the northeast (USGS, n.d.).

4.13.2.5 Wild and Scenic Rivers

There are no wild or scenic rivers located near SMF. The nearest river listed as wild and/or scenic is the Lower American River located approximately 8.48 miles southeast of SMF (NWSRS, 2025).

Rivers inventoried for inclusion under the National Wild and Scenic Rivers Act but have not been designated under the Act may have segments included in the Nationwide Rivers Inventory (NRI). These river segments meet at least one of the "outstandingly remarkable values" and are afforded some protections from impacts of federal actions, but do not receive the same protection and management as the designated Wild and Scenic Rivers (National Wild and Scenic Rivers System, 2024). The nearest NRI segment is approximately 26 miles southeast of SMF on the Cosumnes River (NPS, 2025b).

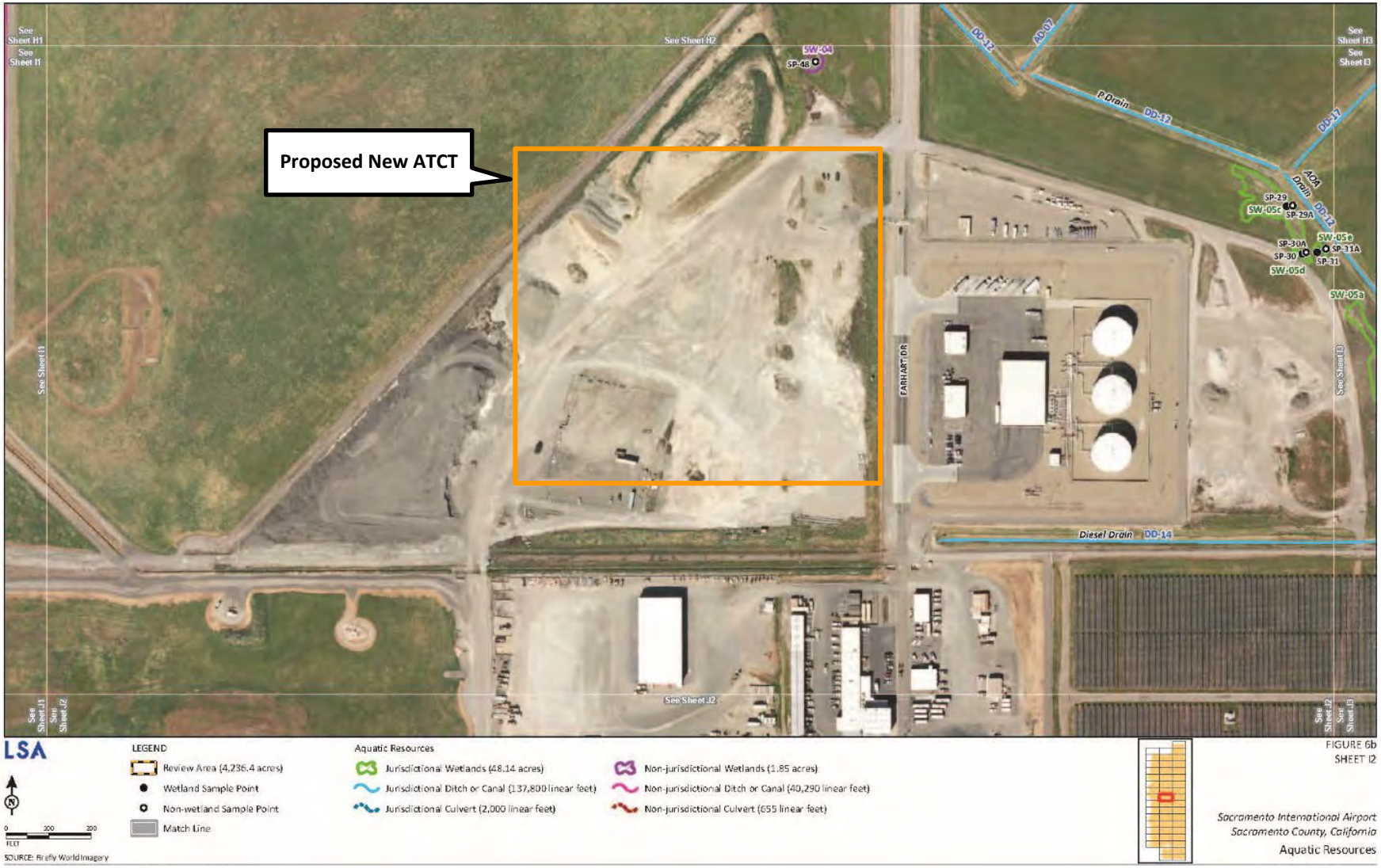

Figure 4-4. Potential Wetlands Identified Near the Proposed New ATCT Site from the 2024 Delineation at SMF

Source: (LSA Associates, Inc., 2024)

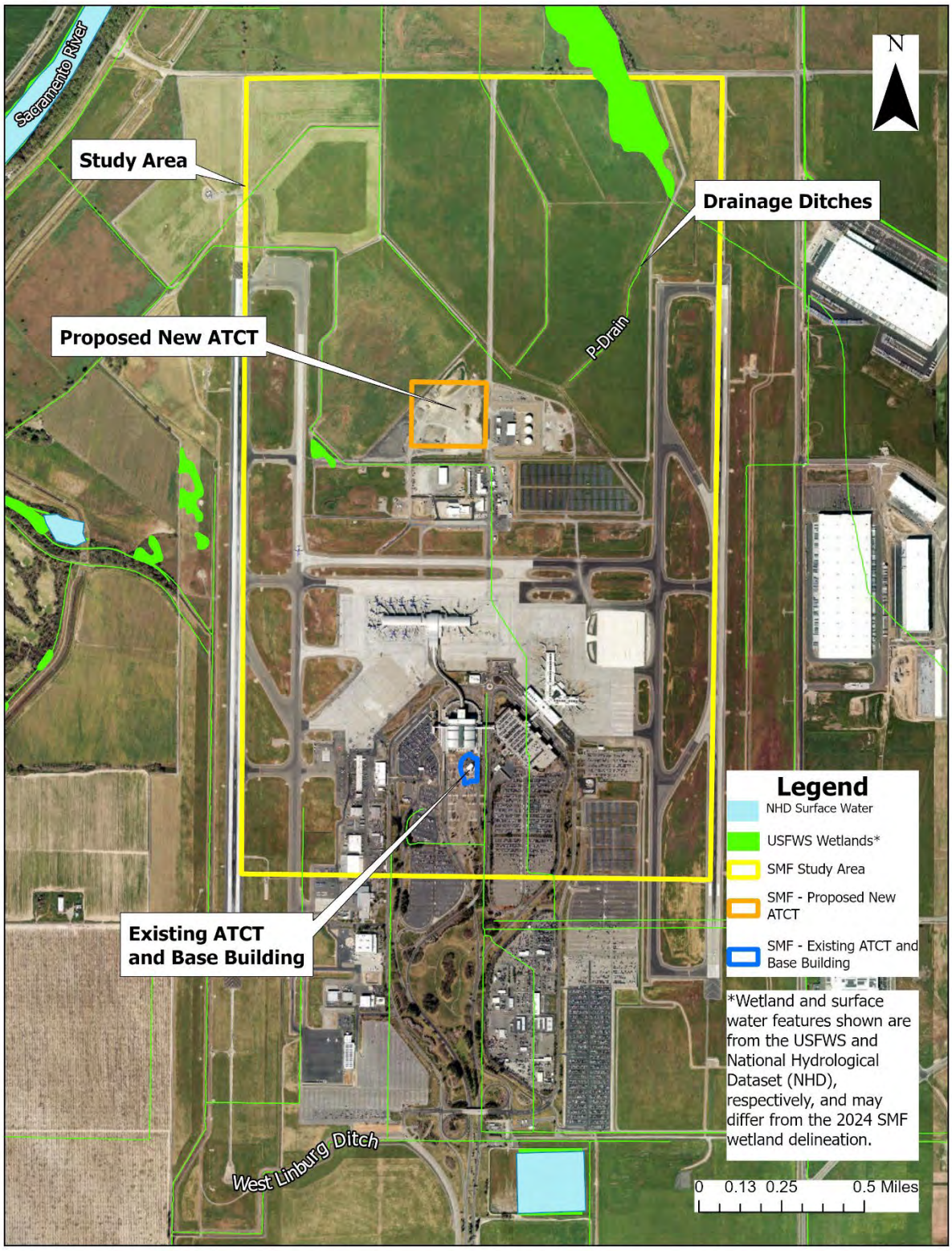

Figure 4-5. Aerial Image of Wetlands and Surface Water Features near SMF

4.13.3 Environmental Consequences

Significance criteria for water resources are included in the "Significant Impact" descriptions in the bullet lists below.

- No Impact: Current water quality, hydrologic conditions, wetlands, floodplains, and wild and scenic rivers would not be altered, or conditions do not exist for impacts to occur.
- Significant Impact – Wetlands:
  - If an action would "1. adversely affect a wetland's function to protect the quality or quantity of municipal water supplies, including surface waters and sole source and other aquifers;
  - 2. Substantially alter the hydrology needed to sustain the affected wetland system's values and functions or those of a wetland to which it is connected;
  - 3. Substantially reduce the affected wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety or welfare (the term welfare includes cultural, recreational, and scientific resources or property important to the public);
  - 4. Adversely affect the maintenance of natural systems supporting wildlife and fish habitat or economically important timber, food, or fiber resources of the affected or surrounding wetlands;
  - 5. Promote development of secondary activities or services that would cause the circumstances listed above to occur; or
  - 6. Be inconsistent with applicable state wetland strategies." (FAA, 2025a)
- Significant Impact – Floodplains: "The action would cause notable adverse impacts on natural and beneficial floodplain values," as defined in Paragraph 4.k of DOT Order 5650.2, *Floodplain Management and Protection"* (FAA, 2025a).
- Significant Impact – Surface Water: "The action would 1. Exceed water quality standards established by federal, state, local, and Tribal regulatory agencies; or contaminate public drinking water supply such that public health may be adversely affected" (FAA, 2025a). Factors to consider include if an action would have the potential to "Adversely affect natural and beneficial water resource values to a degree that substantially diminishes or destroys such values; adversely affect surface waters such that the beneficial uses and values of such waters are appreciably diminished or can no longer be maintained, and such impairment cannot be avoided or satisfactorily mitigated; or present difficulties based on water quality impacts when obtaining a permit or authorization" (FAA, 2025a).
- Significant Impacts – Groundwater: "The action would: 1. Exceed ground water quality standards established by Federal, state, local, and Tribal regulatory agencies; or 2. Contaminate an aquifer used for public water supply such that public health may be adversely affected." (FAA, 2025a) Factors to consider include if an action would have the potential to "Adversely affect natural and beneficial groundwater values to a degree that substantially diminishes or destroys such values; adversely affect groundwater quantities such that the beneficial uses and values of such

groundwater are appreciably diminished or can no longer be maintained, and such impairment cannot be avoided or satisfactorily mitigated; or present difficulties based on water quality impacts when obtaining a permit or authorization" (FAA, 2025a).

- Significant Impacts – Wild and Scenic Rivers: The FAA has not established a significance threshold for wild and scenic rivers. Factors to consider include if the "action would have an adverse impact on the values for which a river was designated (or considered for designation) through: destroying or altering a river's free-flowing nature; a direct and adverse effect on the values for which a river was designated (or under study for designation); introducing a visual, audible, or other type of intrusion that is out of the character with the river or would alter outstanding features of the river's setting; causing the river's water quality to deteriorate; allowing the transfer or sale of property interests without restrictions needed to protect the river or the river corridor (which cannot exceed an average of 320 acres per mile which, if applied uniformly along the entire designated segment, is one-quarter of a mile on each side of the river); or any of the above impacts preventing a river on the Nationwide Rivers Inventory (NRI) or a Section 5(d) river that is not included in the NRI from being including in the Wild and Scenic River System or causing a downgrade in its classification (e.g., from wild to recreational)" (FAA, 2025a).

4.13.3.1 Alternative 1: Proposed Action

Construction of the proposed new ATCT would cause temporary, short-term surface disturbing activities in the span of approximately 13.5 acres due to excavation, increased vehicle traffic, and use of machinery. Soil erosion, contaminant runoff, or spread of non-native, invasive plant species could occur during or following the surface disturbing activities and result in indirect effects to wetlands from sediment build up, contamination of soil or water, and reduction of habitat quality. Direct impacts to the small, isolated, potential wetland to the north of the proposed new ATCT could occur from vehicles straying off of the project area and disrupting soil, hydrology, or vegetation within the wetland. Applying protective BMPs to prevent inadvertent intersection of vehicles and machinery would prevent direct damage of the wetland. Applying BMPs for erosion, runoff, and the spread of invasive species would reduce or prevent possible indirect impacts to wetlands. See Section 4.13.4 for a list of recommended BMPs.

No impacts to floodplains are likely to result from the Proposed Action due to the location of the study area and the levee system preventing flooding at SMF.

Disruption of soil surfaces, introduction of non-native plant species, and contamination of soils from chemicals such as PFAS, hydraulic fluids, or petroleum leaks could occur during ground disturbing activities. Runoff containing contaminated soil could result in offsite interface with surface waters downstream through stormwater conveyance systems. Soil, sediment, or chemical runoff could directly or indirectly damage water quality, alter habitat from sediment build-up, or cause changes to the ecosystems from the introduction of non-native species. Applying BMPs, such as spill/leak monitoring, erosion, and runoff prevention could reduce or prevent impacts to surface water from excavation and construction.

The increased presence of heavy construction equipment, fuels, chemicals, or solvents could impact groundwater quality in the event of a spill or release. The severity would depend on its location, volume, duration of the spill or leak and site personnel's ability to respond appropriately. Applying BMPs, such as spill/leak monitoring and runoff prevention, could reduce or prevent impacts to groundwater from excavation and construction.

Excavation volume and depth for foundation structural components is unknown at this time. Groundwater, and potentially hazardous materials (see Section 4.7.2), would likely be encountered during excavation and construction activities given the approximate depth to groundwater at 9.5-10 feet bgs. If groundwater is encountered and pumping is required, the water may require analysis to determine if contamination is present before being discharged offsite through the airport's stormwater system. Groundwater or groundwater flow could be disrupted at the excavation sites and where structural components are placed; however, these impacts would be temporary in nature. Implementing runoff and contamination prevention BMPs could reduce or prevent impacts to groundwater from excavation and construction.

There are no Wild or Scenic Rivers or NRI segments within the study area. No impacts to these resources are expected from the Proposed Action due to the large distance from the study area to these rivers.

4.13.3.2 Alternative 2: No Action Alternative

Under the No Action Alternative, the existing ATCT and base building would not be removed and replaced, and activities associated with the ATCT would remain the same. No impacts to existing water resources would occur.

4.13.4 Best Management Practices

BMPs to offset unavoidable impacts to water resources allow for onsite absorption of rainwater such as permeable surfaces, allowing natural drainage processes, and erosion prevention measures. Descriptions of recommended BMPs for wetlands, surface waters, and groundwater are described below.

The Sacramento Region has developed a Storm Water Quality Design Manual for construction activities within Sacramento County. This document provides planning tools and requirements to reduce urban runoff pollution to the maximum extent practicable from new development and redevelopment projects (City of Sacramento, 2018).

The SMF SWPPP BMPs provide measures to protect water quality within SMF and surrounding storm discharge systems, wetlands, and surface water, in compliance with the California Industrial General Permit Order to be issued for the Proposed Action at SMF (Environmental Science Associates, 2021).

Protective measures to prevent direct impacts to wetlands near the proposed new ATCT site could include:

- Use of protective fencing to prevent vehicles from entering wetland areas.
- Surround wetlands and stormwater ditches within 200 feet of excavation sites with silt fence or straw wattles to capture silt and runoff from sites.

Measures for reducing runoff and erosion, as described below, would prevent or reduce sediment and the introduction of non-native plant species from degrading nearby wetlands and surface waters. These measures should be implemented within the proposed new ATCT construction site and relevant locations within the study area to avoid the potential for temporary construction impacts to adjacent wetlands and the Sacramento River.

- Use pervious surfaces where practicable.
- Control runoff, while ensuring the runoff control measures do not attract wildlife hazardous to aviation.
- Control waste and spoils disposal to prevent contaminating ground and surface water, while not attracting wildlife hazardous to aviation (e.g., control the use of pesticides and herbicides, maintain vegetative buffers to reduce sedimentation and delivery of chemical pollutants to the waterbody).
- Limit ground disturbance to the areas necessary for project-related construction.
- Employ erosion control measures to minimize sedimentation of surface waters.
- Restore vegetation or stabilize soils on disturbed areas to prevent soil erosion following project completion.

BMPs to reduce direct impacts to groundwater include, but are not limited to, the following:

- Protect water quality of surface water runoff that may infiltrate into the ground.
- Restore vegetation or stabilize soils on disturbed areas to prevent soil erosion following project completion.
- Limit the area of new impervious surfaces to the areas necessary for project-related construction.

4.14 CONCLUSION

This Draft Supplemental EA evaluates the existing environment at SMF and analyzes the reasonably foreseeable environmental consequences of the Proposed Action. Implementation of the Proposed Action as presented in this Draft Supplemental EA would not result in reasonably foreseeable significant impacts to the environment.

SECTION 5 | PUBLIC INVOLVEMENT

The FAA is providing a 508-compliant electronic version of this Draft Supplemental EA for review by the public on the following website: https://www.faa.gov/air_traffic/atf. Comments may be submitted to the FAA lead Patrick Walsh (Patrick.Walsh@faa.gov). A Notice of Intent advertisement published in the *Sacramento Bee* identifies the availability of the Draft Supplemental EA to allow the public to view the document electronically and how to submit comments.

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SECTION 7 | REFERENCES

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APPENDIX A | FEDERALLY LISTED SPECIES REPORTS FOR SACRAMENTO COUNTY AND STUDY AREA

This appendix contains the lists of threatened, endangered, candidate, or species under review by the U.S. Fish and Wildlife Service for Sacramento County, California. Appendix A also provides the protected species list, critical habitat, and other information.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To: 10/31/2025 15:35:03 UTC
Project Code: 2025-0104980
Project Name: SMF EA

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
(916) 414-6600

PROJECT SUMMARY

Project Code: 2025-0104980
Project Name: SMF EA
Project Type: Airport - Maintenance/Modification
Project Description: EA
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@38.69595855,-121.5910010003494,14z

Counties: Sacramento County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

REPTILES

NAME	STATUS
Giant Garter Snake *Thamnophis gigas* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4482	Threatened
Northwestern Pond Turtle *Actinemys marmorata* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

NAME	STATUS
Western Spadefoot *Spea hammondii* Population: Northern DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Valley Elderberry Longhorn Beetle *Desmocerus californicus dimorphus* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7850	Threatened

CRUSTACEANS

NAME	STATUS
Vernal Pool Fairy Shrimp *Branchinecta lynchi* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened
Vernal Pool Tadpole Shrimp *Lepidurus packardi* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2246	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Federal Aviation Administration
Name: Leah Wise
Address: 901 15th street
City: Washington
State: DC
Zip: 20005
Email wise_leah@bah.com
Phone: 6076612124

You have indicated that your project falls under or receives funding through the following special project authorities:

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)

ECOS Environmental Conservation Online System

Conserving the Nature of America

ECOS / Species Reports / Species County Report

Listed species believed to or known to occur in Sacramento, California

This report includes species only if they have a **Spatial Current Range** in ECOS.

The following report contains species that are known to or are believed to occur in this county, based on the species current range, as defined by the USFWS. The definition of current range that the FWS uses is the general geographic area where we know or suspect that a species currently occurs.

This list of species by county cannot be used for consultation purposes. To obtain an official list of species that should be considered during consultation, please visit IPaC.

CSV

Show 10 entries Search:

33 Species Listings

Group	Name	Population	Status	Lead Region	Lead Office	Recovery Plan	Recovery Plan Action Status
Birds	western snowy plover (Charadrius nivosus nivosus)	Pacific Coast population DPS-U.S.A. (CA, OR, WA), Mexico (within 50 miles of Pacific coast)	Threatened	8	Arcata Fish and Wildlife Office	Final Recovery Plan for the Western Snowy Plover	Implementation Progress
Flowering Plants	Palmate-bracted bird's beak (Cordylanthus palmatus)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Upland Species of the San Joaquin Valley, California	Implementation Progress
Insects	Monarch butterfly (Danaus plexippus)	Wherever found	Proposed Threatened	3	Assistant Regional Director-Ecological Services		
Flowering Plants	Slender Orcutt grass (Orcuttia tenuis)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress
Flowering Plants	Colusa grass (Neostapfia colusana)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress
					Indiana		

Mammals	Little brown bat (Myotis lucifugus)	Wherever found	Under Review	3	Indiana Ecological Services Field Office		
Birds	California least tern (Sternula antillarum browni)	Wherever found	Endangered	8	Carlsbad Fish and Wildlife Office	Revised California Least Tern Recovery Plan	Implementation Progress
Flowering Plants	Ione manzanita (Arctostaphylos myrtifolia)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office		
Flowering Plants	Pine Hill flannelbush (Fremontodendron californicum ssp. decumbens)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan Amendment for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress
Flowering Plants	Pine Hill flannelbush (Fremontodendron californicum ssp. decumbens)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress

	(Ambystoma californiense)	California)			Wildlife Office	Segment of the California Tiger Salamander (Ambystoma californiense)	Progress
Amphibians	California red-legged frog (Rana draytonii)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office	Recovery Plan for the California Red-legged Frog (Rana aurora draytonii)	Implementation Progress
Amphibians	Foothill yellow-legged frog (Rana boylii)	California, Sierra Nevada Mountains south of American River sub-basin south to Transverse Range, Kern County	Endangered	8	Sacramento Fish and Wildlife Office	Foothill yellow-legged frog recovery outline	Implementation Progress
Flowering Plants	El Dorado bedstraw (Galium californicum ssp. sierrae)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan Amendment for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress
Flowering Plants	El Dorado bedstraw (Galium californicum ssp. sierrae)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress

Group	Name	Population	Status	Lead Region	Lead Office	Recovery Plan	Recovery Plan Action Status
Flowering Plants	Soft bird's-beak (Cordylanthus mollis ssp. mollis)	Wherever found	Endangered	8	San Francisco Bay-Delta Fish and Wildlife	Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California	Implementation Progress
Flowering Plants	Ione (incl. Irish Hill) buckwheat (Eriogonum apricum (incl. var. prostratum))	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office		
Reptiles	Northwestern Pond Turtle (Actinemys marmorata)	Wherever found	Proposed Threatened	8	Sacramento Fish and Wildlife Office		
Amphibians	California tiger Salamander (Ambystoma	U.S.A. (CA - Central California)	Threatened	8	Sacramento Fish and Wildlife	Recovery Plan for the Central California Distinct Population Segment of the	Implementation Progress

Show 10 entries Search:

33 Species Listings

Group	Name	Population	Status	Lead Region	Lead Office	Recovery Plan	Recovery Plan Action Status
Crustaceans	Conservancy fairy shrimp (Branchinecta conservatio)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress
Fishes	Delta smelt (Hypomesus transpacificus)	Wherever found	Threatened	8	San Francisco Bay-Delta Fish and Wildlife	Recovery Plan for the Sacramento-San Joaquin Delta Native Fishes	Implementation Progress
Amphibians	Western spadefoot (Spea hammondii)	Northern Distinct Population Segment	Proposed Threatened	8	Sacramento Fish and Wildlife Office		
Flowering Plants	Sacramento Orcutt grass (Orcuttia viscida)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress
Birds	Yellow-billed Cuckoo (Coccyzus americanus)	Western DPS: U.S.A. (AZ, CA, CO (western), ID, MT (western), NM (western), NV, OR, TX (western), UT, WA, WY (western)); Canada (British Columbia (southwestern); Mexico (Baja California, Baja California Sur, Chihuahua, Durango (western), Sinaloa, Sonora)	Threatened	2	Arizona Ecological Services Field Office		
Birds	Least Bell's vireo (Vireo bellii pusillus)	Wherever found	Endangered	8	Carlsbad Fish and Wildlife Office	Draft Recovery Plan for the Least Bell's Vireo	Implementation Progress
Flowering Plants	Fleshy owl's-clover (Castilleja campestris ssp. succulenta)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress

Crustaceans	Vernal pool fairy shrimp (Branchinecta lynchi)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress
Reptiles	Giant garter snake (Thamnophis gigas)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office	Recovery Plan for the Giant Garter Snake (Thamnophis gigas)	Implementation Progress
Flowering Plants	Sacramento Orcutt grass (Orcuttia viscida)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress
Birds	Yellow-billed Cuckoo (Coccyzus americanus)	Western DPS: U.S.A. (AZ, CA, CO (western), ID, MT (western), NM (western), NV, OR, TX (western), UT, WA, WY (western)); Canada (British Columbia (southwestern); Mexico (Baja California, Baja California Sur, Chihuahua, Durango (western), Sinaloa, Sonora)	Threatened	2	Arizona Ecological Services Field Office		

Group	Name	Population	Status	Lead Region	Lead Office	Recovery Plan	Recovery Plan Action Status
Crustaceans	Vernal pool tadpole shrimp (Lepidurus packardi)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon	Implementation Progress
Flowering Plants	Pine Hill ceanothus (Ceanothus roderickii)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress
Flowering Plants	Stebbins' morning-glory (Calystegia stebbinsii)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress
Birds	California Ridgway's rail (Rallus obsoletus obsoletus)	Wherever found	Endangered	8	San Francisco Bay-Delta Fish and Wildlife	Recovery Plan for Tidal Marsh Ecosystems of Northern and Central	Implementation Progress

Flowering Plants	El Dorado bedstraw (Galium californicum ssp. sierrae)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan Amendment for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress
Flowering Plants	El Dorado bedstraw (Galium californicum ssp. sierrae)	Wherever found	Endangered	8	Sacramento Fish and Wildlife Office	Recovery Plan for Gabbro Soil Plants of the Central Sierra Nevada Foothills	Implementation Progress
Fishes	Longfin Smelt (Spirinchus thaleichthys)	San Francisco Bay-Delta Distinct Population Segment	Endangered	8	San Francisco Bay-Delta Fish and Wildlife	Recovery Outline for the San Francisco Bay-Delta Distinct Population Segment of the Longfin Smelt	Implementation Progress
Insects	Valley elderberry longhorn beetle (Desmocerus californicus dimorphus)	Wherever found	Threatened	8	Sacramento Fish and Wildlife Office	Revised Recovery Plan for Valley Elderberry Longhorn Beetle (Desmocerus californicus dimorphus)	Implementation Progress

APPENDIX B | SECTION 106 CONSULTATION

U.S. Department of Transportation
Federal Aviation Administration

United States Department of Transportation
FEDERAL AVIATION ADMINISTRATION
Air Traffic Organization
Engineering Services
2200 South 216th Street
Des Moines, WA 98198

AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT PROJECT

April 3, 2026

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act and Finding of Adverse Effect for the Proposed Replacement Airport Traffic Control Tower (ATCT) at the Sacramento International Airport, Sacramento, California

Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Dear Ms. Polanco:

Introduction

The Federal Aviation Administration (FAA), in accordance with Section 106 of the National Historic Preservation Act of 1966 and implementing regulations (36 Code of Federal Regulations [CFR] Part 800), invites you to participate in consultation for the proposed construction of a new Airport Traffic Control Tower (ATCT) at Sacramento International Airport (SMF), Sacramento, California. This letter's purpose is to initiate Section 106 consultation with your office in accordance with 36 CFR § 800.3(c) and solicit any comments you may have about the proposed undertaking.

This project is a FAA funded undertaking under Section 106 to construct a new ATCT and demolish the existing ATCT and administrative base building at SMF. The FAA plans to align its review process for Section 106 with the requirements of the National Environmental Policy Act (NEPA). The proposed undertaking would occur within SMF in Sacramento, California (see Exhibit 1 – Project Area and Area of Potential Effects).

Description of the Undertaking

The FAA is proposing to build and operate an ATCT at latitude 38° 42' 10.00" N, longitude 121° 35' 30.14" W, located approximately 4,600 feet north from the existing ATCT located at 5620 Alan Boyd Drive (see Exhibit 2 – Site Plans). Total acreage of the project area is 15.74-acres, including the 2.24-acre area of the existing ATCT and the 13.5-acre area of the proposed new ATCT. The proposed undertaking would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements.

The existing SMF ATCT and base building are beyond their useful design life and have reached their operational and functional capability. The existing ATCT does not have the ability to accommodate

upgrades to the latest air traffic control technologies, lacks personnel space requirements and modern amenities, and exhibits physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation). The proposed new ATCT would enable the installation of modern and required air traffic control equipment, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design while meeting applicable FAA requirements. The proposed new base building would provide offices, break rooms, and associated workspace.

The proposed new tower cab floor elevation would be 175 feet above ground level and 150 feet above mean sea level. This is the minimum height that would meet all siting criteria under the Safety Management System. At this height, controllers would have unobstructed views of all airport-controlled areas and all airborne traffic with existing infrastructure. The proposed new ATCT would have a 12-sided, 550 square foot cab. This proposed design would allow for a safe operating environment and includes upgrades for resistance against seismic events.

For new construction, site access for the project would use Alberta Road and Earhart Road, and staging areas would consist of existing parking lots and previously disturbed areas adjacent to and within the project area. For the demolition of the existing ATCT and base building, site access for the project would occur via Airport Boulevard West, west of the existing ATCT, and staging areas would consist of the existing parking lot. To provide uninterrupted air traffic control services, the existing ATCT and base building would be demolished after commissioning of the new ATCT is completed.

Area of Potential Effects

The Area of Potential Effects (APE), as defined at 36 CFR 800.16(d), is the geographic area or areas within which the undertaking may directly or indirectly cause alterations in the character or use of any historic properties. Actions that have the potential to affect historic properties include construction and ground disturbance as well as noise, vibration, and visual effects.

Based on the potential for direct and indirect effects, the APE for the proposed undertaking includes a 0.5-mile radius around the location of the proposed new ATCT and the existing SMF ATCT sites. Within the project area, construction, demolition, maintenance, and usage effects may occur (see Exhibit 1). New utilities would be placed from existing utility lines within the APE. Existing airport perimeter, maintenance, and public access roads would be used for construction and maintenance traffic.

The proposed ATCT would be visible from much of the surrounding area. The design intention for the proposed ATCT is to create an efficient, low maintenance facility which meets the operational requirements of the airport, harmonizes with the surrounding environment, and is consistent in character with the existing and proposed airport facilities.

Historic Property Identification

The SMF Airport was first established and began operation in 1967. Commissioned in 1967, the existing ATCT on the property is an I.M. Pei standard tower type. The Pei standard ATCT design consists of a non-occupied pentagonal cast-in-place concrete shaft supporting a pentagonal prefabricated, aluminum framed cab. The Pei standard ATCT design was constructed from the late 1960s into the early 1970s and derives its name from renowned architect I.M. Pei.

Booz Allen Hamilton (Booz Allen) prepared a report, *Airport Traffic Control Tower Replacement, Historic Resources Report for Sacramento International Airport (SMF), Sacramento, California*, evaluating the National Register eligibility of the existing SMF ATCT, administrative base building, and other historic-

age resources on the airport property (see Exhibit 3). This report serves as the FAA's Section 106 identification and evaluation document pursuant to 36 CFR § 800.4 and supports the FAA's finding of effect determination under 36 CFR § 800.5. Booz Allen recommended the existing ATCT and base building as individually eligible for the National Register of Historic Places (NRHP) under Criteria A and C, and the United Cargo building and the former fire station, as not individually eligible for the NRHP. Due to previous ground disturbance within the project area, no archaeological work was recommended.

There are two archeological sites recorded within SMF Airport: P-34-005004, Reclamation District 1000, and P-34-005225, the Sacramento River Tribal Cultural Landscape. Due to routine construction and demolition at SMF, the two archeological sites are unlikely to yield new information in the future. Both sites are within the APE.

Assessment of Effects

Construction of the proposed ATCT would occur within the developed SMF airport property. The proposed site is located within the airport operations area at latitude 38° 42' 10.00" N, longitude 121° 35' 30.14" W. The existing ATCT and base building proposed for demolition are in the project area located at 5620 Alan Boyd Drive and are historic properties considered eligible for the NRHP. The demolition of the historic existing SMF ATCT and base building would constitute an adverse effect.

The proposed ATCT's construction would have no adverse effect on other historic-age resources remaining at SMF.

Construction of the proposed ATCT and demolition of the existing SMF ATCT and base building would occur within previously disturbed areas of the developed airport. Therefore, it is unlikely that undisturbed cultural resources remain within the project area. If, however, during construction or maintenance activities, any cultural resources are discovered, construction would cease and the appropriate state, federal, and tribal officials would be notified and given the opportunity to review, determine its significance, and implement any necessary mitigation measures.

The FAA proposes a Finding of Adverse Effect due to the proposed demolition of the NRHP eligible SMF ATCT and base building. In accordance with 36 CFR § 800.6, the FAA is consulting with you and other Section 106 consulting parties to develop and evaluate strategies to avoid, minimize, or mitigate adverse effects to this historic property, with the goal of developing a Memorandum of Agreement with the California State Historic Preservation Office (SHPO) and other potential consulting parties for mitigation of the adverse effect. This information would be shared with the public in the Final Supplemental Environmental Assessment.

Section 106 Consultation

In accordance with 36 CFR § 800.3, the FAA has identified the California SHPO as a Section 106 consulting party. The FAA identified and separately initiated consultation with the following federally and non-federally recognized Tribes with known interests in the area on October 21, 2025: Wilton Rancheria, United Auburn Indian Community of the Auburn Rancheria, Shingle Springs Band of Miwok Indians and Tsi-Akim Maidu of the Taylorsville Rancheria. On November 5, 2025, the Wilton Rancheria responded to the FAA's initiation of consultation stating that although the project is within the ancestral territory of the Wilton Rancheria, the Tribe does not have any comments and does not wish to open consultation at this time. On December 10, 2025, the Shingle Springs Band of Miwok Indians responded stating that the Tribe would like to be added as a consulting party in identifying any Tribal Cultural Properties that may exist within the APE. Concurrently with this submittal, the FAA continued consultation with the identified Tribes regarding the proposed project.

The FAA is also initiating consultation with the Sacramento County Department of Airports, the Sacramento Historical Society, and the Center for Sacramento History. Invited parties have 30 days to respond and provide comments.

The FAA integrated the public involvement for this proposed undertaking with this project's NEPA process. Information on the Draft Environmental Assessment for the SMF ATCT is available through a dedicated website location at: https://www.faa.gov/air_traffic/atf.

Request for Comment and Concurrence

As outlined above, the purpose of this letter is to seek your concurrence with the APE and the FAA's Finding of Adverse Effect and invite your views on the effects. We request that you review the information and respond within 30 days of receiving this letter. If you should need any further information or wish to discuss the project, please contact Patrick Walsh at (206) 231-2695 or Patrick.Walsh@FAA.gov.

Sincerely,

Vincent Nguyen

On behalf of Patrick Walsh
Lead General Engineer/Environmental Engineer
Federal Aviation Administration
AJW-2W16E – EOSH Support Center

CC: Monica Newman, Executive Secretary, Office of Historic Preservation

Enclosures

Exhibit 1 – Project Area and Area of Potential Effects
Exhibit 2 – Site Plans
Exhibit 3 – *Airport Traffic Control Tower Replacement, Historic Resources Report for Sacramento International Airport (SMF), Sacramento, California*

U.S. Department of Transportation
Federal Aviation Administration

United States Department of Transportation
FEDERAL AVIATION ADMINISTRATION
Air Traffic Organization
Engineering Services
2200 South 216th Street
Des Moines, WA 98198

AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT PROJECT

April 3, 2026

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act and Finding of Adverse Effect for the Proposed Replacement Airport Traffic Control Tower (ATCT) at the Sacramento International Airport, Sacramento, California

Cindy Nichol
Director of Airports
Sacramento County Department of Airports
6900 Airport Boulevard
Sacramento, CA 95837

Dear Ms. Nichol:

Introduction

The Federal Aviation Administration (FAA), in accordance with Section 106 of the National Historic Preservation Act of 1966 and implementing regulations (36 Code of Federal Regulations [CFR] Part 800), invites you to participate in consultation for the proposed construction of a new Airport Traffic Control Tower (ATCT) at Sacramento International Airport (SMF), Sacramento, California. This letter's purpose is to initiate Section 106 consultation with your office in accordance with 36 CFR § 800.3(c) and solicit any comments you may have about the proposed undertaking.

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The existing SMF ATCT and base building are beyond their useful design life and have reached their operational and functional capability. The existing ATCT does not have the ability to accommodate

upgrades to the latest air traffic control technologies, lacks personnel space requirements and modern amenities, and exhibits physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation). The proposed new ATCT would enable the installation of modern and required air traffic control equipment, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design while meeting applicable FAA requirements. The proposed new base building would provide offices, break rooms, and associated workspace.

The proposed new tower cab floor elevation would be 175 feet above ground level and 150 feet above mean sea level. This is the minimum height that would meet all siting criteria under the Safety Management System. At this height, controllers would have unobstructed views of all airport-controlled areas and all airborne traffic with existing infrastructure. The proposed new ATCT would have a 12-sided, 550 square foot cab. This proposed design would allow for a safe operating environment and includes upgrades for resistance against seismic events.

For new construction, site access for the project would use Alberta Road and Earhart Road, and staging areas would consist of existing parking lots and previously disturbed areas adjacent to and within the project area. For the demolition of the existing ATCT and base building, site access for the project would occur via Airport Boulevard West, west of the existing ATCT, and staging areas would consist of the existing parking lot. To provide uninterrupted air traffic control services, the existing ATCT and base building would be demolished after commissioning of the new ATCT is completed.

Area of Potential Effects

The Area of Potential Effects (APE), as defined at 36 CFR 800.16(d), is the geographic area or areas within which the undertaking may directly or indirectly cause alterations in the character or use of any historic properties. Actions that have the potential to affect historic properties include construction and ground disturbance as well as noise, vibration, and visual effects.

Based on the potential for direct and indirect effects, the APE for the proposed undertaking includes a 0.5-mile radius around the location of the proposed new ATCT and the existing SMF ATCT sites. Within the project area, construction, demolition, maintenance, and usage effects may occur (see Exhibit 1). New utilities would be placed from existing utility lines within the APE. Existing airport perimeter, maintenance, and public access roads would be used for construction and maintenance traffic.

The proposed ATCT would be visible from much of the surrounding area. The design intention for the proposed ATCT is to create an efficient, low maintenance facility which meets the operational requirements of the airport, harmonizes with the surrounding environment, and is consistent in character with the existing and proposed airport facilities.

Historic Property Identification

The SMF Airport was first established and began operation in 1967. Commissioned in 1967, the existing ATCT on the property is an I.M. Pei standard tower type. The Pei standard ATCT design consists of a non-occupied pentagonal cast-in-place concrete shaft supporting a pentagonal prefabricated, aluminum framed cab. The Pei standard ATCT design was constructed from the late 1960s into the early 1970s and derives its name from renowned architect I.M. Pei.

Booz Allen Hamilton (Booz Allen) prepared a report, *Airport Traffic Control Tower Replacement, Historic Resources Report for Sacramento International Airport (SMF), Sacramento, California*, evaluating the National Register eligibility of the existing SMF ATCT, administrative base building, and other historic-

age resources on the airport property. This report serves as the FAA's Section 106 identification and evaluation document pursuant to 36 CFR § 800.4 and supports the FAA's finding of effect determination under 36 CFR § 800.5. Booz Allen recommended the existing ATCT and base building as individually eligible for the National Register of Historic Places (NRHP) under Criteria A and C, and the United Cargo building and the former fire station, as not individually eligible for the NRHP. Due to previous ground disturbance within the project area, no archaeological work was recommended.

There are two archeological sites recorded within SMF Airport: P-34-005004, Reclamation District 1000, and P-34-005225, the Sacramento River Tribal Cultural Landscape. Due to routine construction and demolition at SMF, the two archeological sites are unlikely to yield new information in the future. Both sites are within the APE.

Assessment of Effects

Construction of the proposed ATCT would occur within the developed SMF airport property. The proposed site is located within the airport operations area at latitude 38° 42' 10.00" N, longitude 121° 35' 30.14" W. The existing ATCT and base building proposed for demolition are in the project area located at 5620 Alan Boyd Drive and are historic properties considered eligible for the NRHP. The demolition of the historic existing SMF ATCT and base building would constitute an adverse effect.

The proposed ATCT's construction would have no adverse effect on other historic-age resources remaining at SMF.

Construction of the proposed ATCT and demolition of the existing SMF ATCT and base building would occur within previously disturbed areas of the developed airport. Therefore, it is unlikely that undisturbed cultural resources remain within the project area. If, however, during construction or maintenance activities, any cultural resources are discovered, construction would cease and the appropriate state, federal, and tribal officials would be notified and given the opportunity to review, determine its significance, and implement any necessary mitigation measures.

The FAA proposes a Finding of Adverse Effect due to the proposed demolition of the NRHP eligible SMF ATCT and base building. In accordance with 36 CFR § 800.6, the FAA is consulting with you and other Section 106 consulting parties to develop and evaluate strategies to avoid, minimize, or mitigate adverse effects to this historic property, with the goal of developing a Memorandum of Agreement with the California State Historic Preservation Office and other potential consulting parties for mitigation of the adverse effect. This information would be shared with the public in the Final Supplemental Environmental Assessment.

Section 106 Consultation

In accordance with 36 CFR § 800.3, the FAA has identified the Sacramento County Department of Airports as a Section 106 consulting party. On October 21, 2025, the FAA identified and initiated consultation with the following federally and non-federally recognized Tribes with known interests in the area: Wilton Rancheria, United Auburn Indian Community of the Auburn Rancheria, Shingle Springs Band of Miwok Indians, and Tsi-Akim Maidu of the Taylorsville Rancheria. On November 5, 2025, the Wilton Rancheria responded to the FAA's initiation of consultation stating that although the project is within the ancestral territory of the Wilton Rancheria, the Tribe does not have any comments and does not wish to open consultation at this time. On December 10, 2025, the Shingle Springs Band of Miwok Indians responded stating that the Tribe would like to be added as a consulting party in identifying any Tribal Cultural Properties that may exist within the APE. Concurrently with this submittal, the FAA continued Consultation with the identified Tribes regarding the proposed project.

The FAA will also initiate consultation with the California State Historic Preservation Office, the Sacramento Historical Society, and the Center for Sacramento History. Invited parties have 30 days to respond and provide comments.

The FAA integrated the public involvement for this proposed undertaking with this project's NEPA process. Information on the Draft Supplemental Environmental Assessment for the SMF ATCT is available through a dedicated website location at: https://www.faa.gov/air_traffic/atf.

Request for Comment and Concurrence

As outlined above, the purpose of this letter is to seek your input with the APE and the FAA's Finding of Adverse Effect and invite your views on the effects. We request that you review the information and respond within 30 days of receiving this letter. If you should need any further information or wish to discuss the project, please contact Patrick Walsh at (206) 231-2695 or Patrick.Walsh@FAA.gov.

Sincerely,

Vincent Nguyen

On behalf of Patrick Walsh
Lead General Engineer/Environmental Engineer
Federal Aviation Administration
AJW-2W16E – EOSH Support Center

CC: Glen Rickelton, Senior Airport Manager, Planning & Development, Department of Airports

Enclosures

Exhibit 1 – Project Area and Area of Potential Effects
Exhibit 2 – Site Plans

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

United States Department of Transportation
FEDERAL AVIATION ADMINISTRATION
Air Traffic Organization
Engineering Services
2200 South 216th Street
Des Moines, WA 98198

AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT PROGRAM

October 21, 2025

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act and Notification of Finding of Adverse Effect for the Proposed Replacement Airport Traffic Control Tower (ATCT) at the Sacramento International Airport, Sacramento, California

Regina Cuellar
Chairperson
Shingle Springs Band of Miwok Indians
5281 Honpie Road
Placerville, CA 95667

Dear Chairperson Cuellar:

Introduction

The Federal Aviation Administration (FAA), in accordance with Section 106 of the National Historic Preservation Act of 1966 and implementing regulations (36 Code of Federal Regulations [CFR] Part 800), invites you to participate in consultation for the proposed replacement of the FAA-managed Airport Traffic Control Tower (ATCT) at Sacramento International Airport (SMF) at 6900 Airport Boulevard, Sacramento, California. In accordance with 36 CFR 800.3(g), the FAA is initiating a Section 106 consultation for the project and interested in knowing if the Shingle Springs Band of Miwok Indians attaches religious or cultural significance to the locations shown on the enclosed so that we may appropriately consider your interests. This letter is also to notify your Tribe of the FAA's finding.

Under the ATCT Replacement Program (Program), the FAA plans to replace existing FAA-managed ATCTs with modern facilities at airports across the nation. The Infrastructure Investment and Jobs Act (Public Law 117-58), formerly referred to as the Bipartisan Infrastructure Law (BIL), provided funding to improve ATCTs nationwide.

This project is a component of the Program and is an undertaking under Section 106 to construct a new ATCT and demolish the existing ATCT at SMF. The FAA will be coordinating its review under Section 106 with its compliance under the National Environmental Policy Act (NEPA). The proposed undertaking would occur within Sacramento International Airport, Sacramento, California (see Exhibit 1 – Project Area and Area of Potential Effects).

Description of the Undertaking

The FAA is proposing to build and operate an ATCT at latitude 38° 42' 10.00" N and a longitude of 121° 35' 30.14" W, located 4,600 feet north from the existing ATCT located at 5620 Alan Boyd Drive (see Exhibit 2 – Site Plans). Total acreage of the project area is 4.24-acres, including the 2.24-acre area of the existing ATCT and the 2-acre area of the proposed new ATCT. The proposed undertaking would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements.

The existing ATCT is beyond its useful design life and has reached its operational and functional capability. The existing ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, lacks personnel space requirements and modern amenities, and exhibits physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation). The proposed ATCT would enable the installation of modern and required air traffic control equipment, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design while meeting applicable FAA requirements.

The proposed tower cab floor elevation would be 175 feet (ft) above ground level and 150 ft above mean sea level. This is the minimum height that would meet all siting criteria under the Safety Management System. At this height, controllers would have unobstructed views of all airport-controlled areas and all airborne traffic with existing infrastructure. The proposed new ATCT would have a 12-sided, 550 square foot cab. This proposed design would allow for a safe operating environment and would include upgrades for resistance against seismic events.

For new construction, site access for the project would occur using Alberta Road and Earhart Road and staging areas would consist of parking lots and previously disturbed areas adjacent to and within the project area. For the demolition of the existing ATCT, site access for the project would occur via Airport Boulevard West, west of the existing ATCT, and staging areas would consist of the existing parking lot. To provide uninterrupted air traffic control services, the existing ATCT would be demolished after construction of the new ATCT is completed.

Area of Potential Effects

The Area of Potential Effects (APE), as defined at 36 CFR 800.16(d), is the geographic area or areas within which the undertaking may directly or indirectly cause alterations in the character or use of any historic properties. Actions that have the potential to affect historic properties include construction and ground disturbance as well as noise, vibration, and visual effects.

Based on the potential for direct and indirect effects, the APE for the proposed undertaking includes a 0.5-mile radius around the location of the proposed ATCT and the existing ATCT. Within the project area, construction, demolition, maintenance, and usage effects may occur (see Exhibit 1). New utilities would be placed from existing utility lines within the APE. Existing airport perimeter, maintenance, and public access roads would be used for construction and maintenance traffic.

The proposed ATCT would be visible from much of the surrounding area. The design intention for the proposed ATCT is to create an efficient, low maintenance facility which meets the operational requirements of the airport, harmonizes with the surrounding environment, and is consistent in character with the existing and proposed airport facilities.

Historic Property Identification

The SMF Airport was first established and began operation in 1967. The existing ATCT on the property is an I.M. Pei standard tower type and commissioned in 1967. It is greater than 45 years of age and is likely unevaluated for eligibility for the NRHP. The SMF Pei tower was the second design the FAA commissioned, and I.M. Pei & Associates' design included a non-occupied pentagonal cast-in-place concrete shaft supporting a pentagonal prefabricated, aluminum framed cab. The first I.M Pei tower was constructed in 1966 and the last in 1976.

Booz Allen Hamilton (Booz Allen) prepared a report, *Airport Traffic Control Tower Replacement Program, Historic Resources Report for Sacramento International Airport (SMF), Sacramento, California*. The report evaluated the eligibility of the existing ATCT and other historic-age resources on the airport property. Booz Allen recommended the existing ATCT as individually eligible for the NRHP under Criteria A and C; and the existing ATCT base building, the United Cargo building, and the historic fire station, as not individually eligible for the NRHP. Due to previous ground disturbance within the project area, no archaeological work was recommended.

There are two archeological sites recorded within the Sacramento International Airport. The first is P-34-005004, Reclamation District 1000. The second is P-34-005225, the Sacramento River Tribal Cultural Landscape. Due to routine construction and demolition at SMF, the two archeological sites are unlikely to yield new information potential. Both sites are within the APE.

Assessment of Effects

Construction of the proposed ATCT would occur within the developed airport property. The proposed site is located within the airport operations area at latitude 38° 42' 10.00" N and a longitude of 121° 35' 30.14" W. The existing ATCT proposed for demolition is in the project area at 5620 Alan Boyd Drive and is a historic property considered eligible for the NRHP. The demolition of the historic existing ATCT would constitute an adverse effect.

The proposed ATCT's construction would have no adverse effect on other historic-age resources remaining at SMF, including the existing ATCT base building, the United Cargo building, and former fire station, as they are considered not eligible for the NRHP.

Construction of the proposed ATCT and demolition of the existing ATCT would occur within previously disturbed areas of the developed airport. Therefore, it is unlikely that undisturbed cultural resources remain within the project area. If, however, during construction or maintenance activities, any cultural resources are discovered, construction would cease and the appropriate state, federal, and tribal officials would be notified and given the opportunity to review, determine its significance, and implement any necessary mitigation measures.

Request for Information and Comments

As outlined above, the purpose of this letter is to determine whether Shingle Springs Band of Miwok Indians attach religious or cultural significance to the locations within the APE, so that we may appropriately consider your interests. Also, the FAA is notifying your Tribe of our Finding of Adverse Effect.

We request that you review the information and respond within 30 days of receiving this letter if your Tribe is interested in formally consulting with the FAA about this proposed undertaking. If you should need any further information or wish to discuss the project, please contact Patrick Walsh at (206) 231-2695 or at Patrick.Walsh@FAA.gov.

Respectfully,

PATRICK M WALSH Digitally signed by PATRICK M WALSH Date: 2025.10.17 11:24:11 -07'00'

Patrick Walsh
Lead General Engineer/Environmental Engineer
Federal Aviation Administration
AJW-2W16E – EOSH Support Center
Federal Aviation Administration

CC: James Sarmento, Executive Director of Cultural Resources, jsarmento@ssband.org; Dustin Murray, Tribal Administrator, dumurray@ssband.org; Melissa Tayaba, Vice Chairperson, matayaba@ssband.org; Krystal Moreno, TEK Program Manager, kmoreno@ssband.org

Enclosures
Exhibit 1 – Project Location and Area of Potential Effects
Exhibit 2 – Site Plans

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APPENDIX C | DEPARTMENT OF TRANSPORTATION DRAFT SECTION 4(F) EVALUATION

Airport Traffic Control Tower (ATCT) Replacement Project

Sacramento International Airport (SMF) ATCT Draft Department of Transportation (DOT) Section 303(c) Section 4(f) Evaluation

Sacramento, California
April 2026

This DOT 4(f) Evaluation (also referred to as a Section 303(c) Evaluation) is submitted for review pursuant to the following public law requirements: Section 102(2)(c) of the National Environmental Policy Act of 1969; 49 United States Code (U.S.C.) §47106, Section 303 of 49 U.S.C., Subtitle I; and Section 106 of the National Historic Preservation Act of 1966.

Table of Contents

SECTION 1 | INTRODUCTION

The Federal Aviation Administration (FAA) is proposing to replace the existing Airport Traffic Control Tower (ATCT) and administrative base building at Sacramento International Airport (Airport ID: SMF) in Sacramento, California. The FAA's Proposed Action is to replace the existing FAA-owned ATCT with a modern, ATCT facility at Sacramento International Airport. See Section 1.2, Project Description, for activities involved with the ATCT replacement.

The FAA prepared this Draft Department of Transportation (DOT) Section 4(f) Evaluation as an appendix to the Supplemental Environmental Assessment (SEA). This document includes the regulatory context, descriptions of the proposed project and its purpose and need, determination of Section 4(f) applicability, Section 4(f) property and use, measures taken to minimize harm, alternatives analysis, mitigation of impacts, and coordination with Officials having jurisdiction of DOT Section 4(f) lands regarding potential effects of the proposed project.

1.1 REGULATORY CONTEXT

Section 303 was initially codified in Title 49 of the United States Code (U.S.C.) 1653 (Section 4(f) of the USDOT Act of 1966). In 1983, Section 1653(f) was reworded and recodified as Title 49 U.S.C. 303, but still commonly referred to as DOT Section 4(f). Congress amended DOT Section 4(f) in 2005 when it enacted the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy of Users. FAA procedural requirements for Section 4(f) compliance are set forth in DOT Order 5610.1D, *DOT's Procedures for Considering Environmental Impacts* (U.S. DOT, 2025).

DOT Section 4(f) provides that the Secretary of Transportation may approve a transportation program or project requiring the use of publicly owned land off a public park, recreation area or wildlife or waterfowl refuge of national, state or local significance, or land of a historic site of national, State, or local significance, only if there no feasible and prudent alternative to the using of that land and the program or project includes all possible planning to minimize harm resulting from the use.

Specifically, programs or projects requiring the use of Section 4(f) lands cannot be approved by the FAA unless:

- There are no prudent and feasible alternatives to the property's use and
- The project includes all possible planning to minimize harm; or

The Federal Highway Administration (FHWA)/Federal Transit Administration (FTA) regulation defines "feasible and prudent" as:

> (1) A feasible and prudent alternative is one that avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.

(2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.

(3) An alternative is not prudent if it:

i. It compromises the project to such a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;

ii. It results in unacceptable safety or operational problems;

iii. After reasonable mitigation, it still causes:

A. Severe social, economic, or environmental impacts,

B. Severe disruption to established communities,

C. Severe or disproportionate impacts to minority or low-income populations, or

D. Severe impacts to environmental resources protected under other Federal statutes;

i. It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;

ii. It causes other unique problems or unusual factors; or

iii. It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude." (23 CFR § 774.17)

A "use" of a Section 4(f) property occurs when:

- Land is permanently incorporated into a transportation project.
- There is temporary occupancy of land that is adverse in terms of the statute's preservation purpose.
- There is a constructive use of the property that substantially impairs the enjoyment or functional attributes of the resource.

Actions that have the potential to affect Section 4(f) properties involve a physical or constructive use. A physical use can include temporary occupancy for construction-related activities; physical occupation of the property; alteration of structures or facilities on the property; or a physical taking, such as purchase or a permanent easement of the property (FAA, 2020). A constructive use involves the project's proximity significantly impacting a Section 4(f) property so the attributes that qualify the property for protection are substantially impaired; this can include the effects of noise, vibration, access restrictions, visual impacts, ecological intrusions, etc. (FHWA, 2024).

When historic properties are involved, the FAA determines whether Section 4(f) compliance applies and whether a use would occur and whether a *de minimis* determination can be made for historic properties.

A *de minimis* finding may not be made when there is a constructive use. A *de minimis* finding can only be made for physical use impacts to a historic property when the following criteria are met:

- The Section 106 process results in a "no adverse effect" or "no historic properties affected" from the State Historic Preservation Officer (SHPO).
- The SHPO is informed of the *de minimis* impact determination by the FAA based on Section 106 concurrence.
- The U.S. DOT has considered views from participating consulting parties involved in the Section 106 process (FHWA, 2024).

For significant impacts to historic properties that are not considered *de minimis*, avoidance alternatives are required to be evaluated to provide justification and prove there are no feasible and prudent alternatives to use the Section 4(f) property. The project must address all possible planning to minimize harm to the resource.

1.2 PROJECT DESCRIPTION

The FAA's Proposed Action is to replace the existing FAA-owned ATCT with a modern ATCT facility at Sacramento International Airport, California. The Proposed Action is anticipated to include the following activities:

- Acquisition of new lease with the airport authority to construct an ATCT in a new location.
- Unconditional approval of portions of the Airport Layout Plan (ALP) that depict those portions of the Proposed Project subject to FAA review and approval pursuant to 49 United States Code (U.S.C.) §47107(a)(16).
- Construction and operation of a replacement ATCT, an administrative base building, and other associated facility support features such as a parking area and security fences.
- Extension and/or relocation of access roads and utilities to the replacement ATCT.
- Installation of modern air traffic control electronic equipment in the replacement ATCT.
- Commissioning of the replacement ATCT, cutover of air traffic services to the replacement ATCT, and decommissioning of the existing ATCT and administrative base building.
- Demolition and disposal of the existing ATCT facility, ATCT base building, and associated infrastructure.
- Modification and/or relocation of existing National Airspace System (NAS) facilities or airport structures necessary to enable project implementation.

Sacramento International Airport (SMF) (Figure 1-1) is in Sacramento County within Northern California and serves the communities of the greater Sacramento area including El Dorado, Placer, Sacramento, Sutter, Tolo, and Yuba counties. SMF is located approximately

12 miles northwest of downtown Sacramento. SMF reports approximately 148,318 operations annually with mostly commercial service, cargo flights, private air traffic, and fixed-base operator (FBO) services (Booz Allen Hamilton, 2025). SMF is owned by the County of Sacramento. The area around SMF is generally agricultural with commercial buildings located east of the airport.

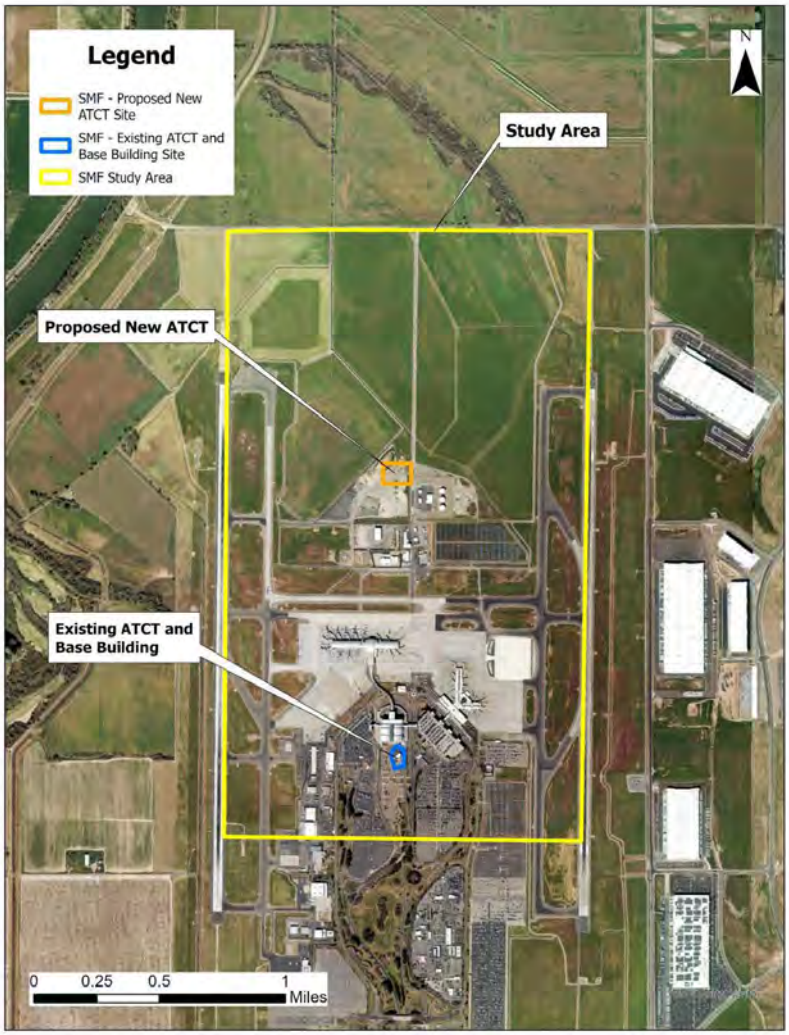

Figure 1-1. Aerial Image of the SMF Airport Property

Constructed in 1967, the existing SMF ATCT is an I.M. Pei design type with an attached base building constructed concurrently with the ATCT (Figure 1-2). The SMF ATCT is accessible only through the base building. The existing ATCT cab is 350 square feet with cab eye level at 125 feet above ground level (AGL) and stands at a total of 175 feet AGL (FAA Air Traffic Organization Technical Operations AJW-2 AJW-2444, 2024). The ATCT operates 24 hours daily with 5 to 6 personnel on duty per shift. The existing ATCT is located in the center portion of the airport on Alan Boyd Drive (38° 41' 26" N, 121° 35' 27" W) (Booz Allen Hamilton, 2025).

Figure 1-2. Photo of Existing Type "O" ATCT at SMF

The base building is a one-story, rectangular, flat roof building on a concrete foundation that faces north. The structure is built into the side of a slight hill. The exterior walls and roof are concrete. The north façade is five bays delineated with a concrete wall perpendicular to the façade. Each bay has aluminum clad fixed-windows, and the entrance is on the northwest side of the base building (Booz Allen Hamilton, 2026).

No public parks, recreation areas, wildlife, or waterfowl refuges were identified within the project area (the area of disturbance of the Proposed Action). Due to the nature of this project, the primary focus was upon a historic site.

1.3 PURPOSE AND NEED

1.3.1 Purpose

The SMF ATCT is an FAA-owned and operated tower proposed for replacement under the ATCT Replacement Program. The purpose of the Proposed Action is to provide SMF with an updated ATCT and base building providing for uninterrupted air traffic control services. The proposed tower location provides unobstructed views of all controlled airport surface areas along with maximum visibility of all airborne traffic.

The Proposed Action at this airport would provide for a modern, operationally efficient ATCT and base building that would meet all applicable FAA requirements. This replacement ATCT and base building would enable the installation of modern and required air traffic control equipment, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design including energy efficient features, windows, and ventilation/heating systems while meeting applicable FAA requirements.

1.3.2 Need

The FAA recognizes the need to provide continual air traffic control services at SMF. The existing SMF ATCT does not have the ability to accommodate upgrades to the latest air traffic control technologies, lacks the personnel space requirements and modern amenities, and has physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation, plumbing). Improvements made to rectify this situation would ensure uninterrupted air traffic control services to maintain the safety of the NAS.

1.4 IDENTIFICATION OF DOT SECTION 4(F) RESOURCES

To identify historic sites, Booz Allen prepared a report, *Airport Traffic Control Tower Replacement, Cultural – Historic Resources Report for Sacramento International Airport (SMF)* (Booz Allen Hamilton, 2025). This report serves as the FAA's Section 106 identification and evaluation document pursuant to 36 CFR § 800.4 and supports the FAA's finding of effect determination under 36 CFR § 800.5. The report identified historic sites in the vicinity of SMF and evaluated the eligibility of the existing ATCT, base building, and other historic-age resources on the airport property by applying the National Register of Historic Places (NRHP) criteria in accordance with the National Park Service's guidelines (NPS, 1997). The NRHP evaluation identified one historic site, the existing ATCT and base building, as a Section 4(f) resource. No other NRHP-eligible historic sites or archaeological sites are located within the project area.

The FAA initiated Section 106 consultation with the California SHPO on the report's recommendations on April 3, 2026 (Appendix A). The existing SMF ATCT and base building (Figure 1-2) are eligible for listing on the NRHP per the integrity aspects and criteria found in 36 CFR § 60.4 under Criteria A and C for its association with early national FAA guidelines

in the 1960's for construction and the implementation of a NAS and as a well-preserved example of a modern master architect-designed ATCT. No previously recorded archaeological resources were identified within or directly adjacent to the project area. Based on previous environmental reviews, no historic or cultural resources were previously identified within the Area of Potential Effects (Booz Allen Hamilton, 2025). The SEA did not identify any public parks, recreation areas, wildlife, or waterfowl refuges within the project area.

1.5 PROPOSED PROJECT USE OF SECTION 4(F) PROPERTY

The project proposes to permanently demolish the NRHP-eligible tower structure and base building. This action has an "adverse effect" to the historic structures as described in 36 CFR 800.5(a)(2)(i) of the regulations implementing Section 106 of the National Historic Preservation Act (NHPA) due to the change in character of the property's use. This adverse effect constitutes a "physical use" of the Section 4(f) property beyond the *de minimis* use as described above. Demolition of the NRHP-eligible existing ATCT and base building would result in a permanent use of the Section 4(f) property.

SECTION 2 | ALTERNATIVES

This section describes the methodology used for determining impacts to Section 4(f) resources and provides details on the alternatives considered including potential impacts. Methods to minimize or mitigate impacts to the preferred alternative are also included.

2.1 METHODOLOGY FOR DETERMINATION OF IMPACTS

The FAA evaluated each DOT Section 4(f) resource for potential impacts associated with each of the alternatives considered. The potential impact criteria evaluated for each site included direct impacts and constructive use impacts.

Section 4(f) of the U.S. DOT Act of 1966 (codified in 49 U.S.C. §303 and 23 U.S.C. §138) applies to projects that receive funding from or require approval by agencies within the DOT and provides for the consideration of the certain properties of national, state, and/or local significance during transportation project development, such as:

- **Publicly owned parks.** This includes publicly owned land, open to the public, used as a public park.
- **Recreational areas.** This includes publicly owned land, open to the public, used as a recreational area, like a baseball complex, tennis court, or other recreational facility.
- **Wildlife and waterfowl refuges.** This includes publicly owned land used as a wildlife and waterfowl refuge that is open to the public.
- **Public and private historic sites.** This includes publicly or privately owned land of an historic site listed or eligible for listing on the National Register of Historic Places (NRHP) and considered a historic property under the National Historic Preservation Act of 1966 (NHPA) (Public Law [P.L.] 89–665, as amended by P.L. 96-515, 54 U.S.C. §300101 et seq.) and its implementing regulations (36 CFR Part 800).

In general, actions that have the potential to affect Section 4(f) resources involve physical or constructive use. A physical use can include temporary occupancy for construction-related activities; physical occupation of the property; alteration of structures or facilities on the property; or a physical taking, such as purchase or a permanent easement of the property (FAA, 2020). A constructive use involves the project's proximity significantly impacting a Section 4(f) property so the attributes that qualify the property for protection are substantially impaired; this can include the effects of noise, vibration, access restrictions, visual impacts, ecological intrusions, etc.

The alternatives identified in this section include the Proposed Action and those that avoid the use of all Section 4(f) properties. The FAA evaluated these alternatives to determine if they would meet feasible and prudent guidelines.

Before approving a transportation project requiring the use of these properties, the FAA must determine that there is no feasible and prudent alternative to using that land and the project includes all possible planning to minimize harm resulting from the use.

Feasibility refers to whether the alternative can be built as a matter of sound engineering judgement. An alternative would not be considered prudent if it:

- Compromises the project to a degree that it is unreasonable if it does not meet the purpose and need for the project;
- Results in unacceptable safety or operational problems;
- After reasonable mitigation is considered, severe social, economic, or environmental impacts; or severe impacts to environmental resources protected under other federal statutes;
- Results in additional construction, maintenance, or operational costs of extraordinary magnitude;
- Causes other unique problems or unusual factors; or
- Involves multiple factors as outlined above that, while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude (FHWA, 2024).

2.2 ALTERNATIVE 1: PROPOSED ACTION (PREFERRED ALTERNATIVE)

The Proposed Action is to demolish the existing ATCT and base building after construction and commissioning of the proposed new ATCT. The demolition would include asbestos abatement and removal of other hazardous materials and proper disposal of the existing ATCT, base building facilities, and associated infrastructure. The FAA found the Proposed Action to have an adverse effect under Section 106 for the existing SMF ATCT and base building due to the direct effects of removal/demolition of the ATCT and base building. These actions constitute a physical use of the historic site under Section 4(f). To mitigate impacts of the Proposed Action, the FAA is initiating consultation and developing a draft Memorandum of Agreement (MOA) with the California SHPO and other consulting parties under Section 106 of the NHPA. The MOA would contain mitigation requirements for the impacts to the Section 4(f) resource (see Section 3).

2.3 ALTERNATIVE 2: NO ACTION

The No Action Alternative is defined as maintaining the status quo (baseline conditions) without federal agency involvement. The No Action Alternative is used to evaluate the effects of not replacing the ATCT and base building and provides a benchmark against which other alternatives may be evaluated. Alternative 2, the No Action Alternative, would not meet the purpose and need to replace the SMF ATCT and base building. As this alternative does not meet the purpose and need, Alternative 2 is not a feasible and prudent alternative.

2.4 ALTERNATIVE 3: RETAIN EXISTING ATCT

Under this alternative, demolition of the existing SMF ATCT and base building would not occur and the tower and base building would remain as is. The proposed new replacement ATCT would be constructed on the proposed site to continue air traffic control services. The FAA would decommission and abandon the existing SMF ATCT and base building for

operational use. This alternative includes removing any valuable materials from the interior and exterior of the existing SMF ATCT and base building. Access to the tower and base building would be closed with fencing to address potential security concerns created by this alternative. Leaving the existing ATCT in place would present a significant investment of FAA resources and operational budget to maintain the existing ATCT and base building as a vacant facility, which ultimately distracts from the FAA's core mission. Alternative 3 would be prohibitive and inconsistent with the mission of the FAA.

SECTION 3 | MITIGATION

As previously described, the FAA evaluated several alternatives that considered avoidance and minimization of effects for the existing SMF ATCT and base building. Complete avoidance would not achieve the purpose and need for the project; therefore, the FAA is consulting with the California State Historic Preservation Office (SHPO) and other Section 106 consulting parties to develop and evaluate strategies to avoid, minimize, or mitigate adverse effects to this historic property, with the goal of developing a Memorandum of Agreement (MOA). After the MOA is executed, the FAA would implement the proposed mitigation measures contained therein.

The preliminary proposed mitigation includes developing an interpretive display highlighting the state and local significance of the existing SMF ATCT. Based on feedback from the SHPO and other interested consulting parties, additional mitigation may be included.

SECTION 4 | CONSULTATION AND COORDINATION

The FAA has undergone consultation with the California SHPO and U.S. Department of Interior (DOI) to solicit comments on this project regarding Section 4(f) (Appendix A). The FAA is providing the DOI with an opportunity to review this Draft 4(f) Evaluation.

Under Section 106 of the NHPA, on April 3, 2026, the FAA initiated consultation for the proposed undertaking and shared its Finding of Adverse Effect with potential Section 106 consulting parties, including the California SHPO, Sacramento County Department of Airports, Shingle Springs Band of Miwok Indians, T'si-Akin Maidu of the Taylorsville Rancheria, United Auburn Indian Community of the Auburn Rancheria, and Wilton Rancheria.

In coordination with the California SHPO and other consulting parties, the FAA will be developing a draft MOA to resolve the proposed undertaking's adverse effect. The draft MOA will include proposed mitigation to resolve the undertaking's adverse effect under Section 106 (see Section 113).

The FAA integrated public involvement for the Section 106 process with this project's NEPA process. The FAA published the Draft SEA for public comment on April 3, 2026, and provided notice through the FAA's dedicated website (www.faa.gov/air_traaffic/atf) and the *Sacramento Bee* newspaper.

SECTION 5 | FINDING

Based on the information evaluated in this document, and after careful and thorough consideration, the FAA determined that there are no feasible and prudent alternatives to the use of DOT Section 4(f) resources (existing ATCT and base building). The Proposed Action would include efforts to minimize impacts to DOT Section 4(f) resources through consultation with the California SHPO and development of a MOA. The preliminary proposed mitigation includes developing an interpretive display highlighting the state and local significance of the existing SMF ATCT. Based on feedback from the SHPO and other interested consulting parties, additional mitigation may be included.

The FAA is preparing a Section 106 MOA and consulting with the California SHPO, and other interested consulting parties, regarding proposed mitigation measures to the identified Section 4(f) property. The MOA would be executed and signed before finalization of the SEA documentation. All possible planning to minimize harm is being incorporated into the project in accordance with Section 4(f) requirements.

SECTION 6 | LIST OF PREPARERS

This Draft Section 4(f) Evaluation was prepared by:

FAA

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SECTION 7 | REFERENCES

Booz Allen Hamilton. (2025). *Sacramento International Airport (SMF), Sacramento, CA, Airport Traffic Control Tower Replacement Site Visit.*

Booz Allen Hamilton. (2026). *Airport Traffic Control Tower Replacement Program Cultural-Historic Resources Report for Sacramento International Airport, Sacramento, California.*

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APPENDIX A | SHPO COORDINATION

U.S. Department of Transportation
Federal Aviation Administration

United States Department of Transportation
FEDERAL AVIATION ADMINISTRATION
Air Traffic Organization
Engineering Services
2200 South 216th Street
Des Moines, WA 98198

AIRPORT TRAFFIC CONTROL TOWER REPLACEMENT PROJECT

April 3, 2026

Re: Initiation of Consultation under Section 106 of the National Historic Preservation Act and Finding of Adverse Effect for the Proposed Replacement Airport Traffic Control Tower (ATCT) at the Sacramento International Airport, Sacramento, California

Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Dear Ms. Polanco:

Introduction

The Federal Aviation Administration (FAA), in accordance with Section 106 of the National Historic Preservation Act of 1966 and implementing regulations (36 Code of Federal Regulations [CFR] Part 800), invites you to participate in consultation for the proposed construction of a new Airport Traffic Control Tower (ATCT) at Sacramento International Airport (SMF), Sacramento, California. This letter's purpose is to initiate Section 106 consultation with your office in accordance with 36 CFR § 800.3(c) and solicit any comments you may have about the proposed undertaking.

This project is a FAA funded undertaking under Section 106 to construct a new ATCT and demolish the existing ATCT and administrative base building at SMF. The FAA plans to align its review process for Section 106 with the requirements of the National Environmental Policy Act (NEPA). The proposed undertaking would occur within SMF in Sacramento, California (see Exhibit 1 – Project Area and Area of Potential Effects).

Description of the Undertaking

The FAA is proposing to build and operate an ATCT at latitude 38° 42' 10.00" N, longitude 121° 35' 30.14" W, located approximately 4,600 feet north from the existing ATCT located at 5620 Alan Boyd Drive (see Exhibit 2 – Site Plans). Total acreage of the project area is 15.74 acres, including the 2.24-acre area of the existing ATCT and the 13.5-acre area of the proposed new ATCT. The proposed undertaking would provide for a modern, operationally efficient ATCT that would meet all applicable FAA requirements.

The existing SMF ATCT and base building are beyond their useful design life and have reached their operational and functional capability. The existing ATCT does not have the ability to accommodate

upgrades to the latest air traffic control technologies, lacks personnel space requirements and modern amenities, and exhibits physical problems such as maintenance-intensive deficient mechanical appurtenances (e.g., heating and ventilation). The proposed new ATCT would enable the installation of modern and required air traffic control equipment, provide adequate space and an enhanced work environment for FAA personnel, lower operating costs, and improve environmental performance, resulting in reduced energy consumption due to an efficient design while meeting applicable FAA requirements. The proposed new base building would provide offices, break rooms, and associated workspace.

The proposed new tower cab floor elevation would be 175 feet above ground level and 150 feet above mean sea level. This is the minimum height that would meet all siting criteria under the Safety Management System. At this height, controllers would have unobstructed views of all airport-controlled areas and all airborne traffic with existing infrastructure. The proposed new ATCT would have a 12-sided, 550 square foot cab. This proposed design would allow for a safe operating environment and includes upgrades for resistance against seismic events.

For new construction, site access for the project would use Alberta Road and Earhart Road, and staging areas would consist of existing parking lots and previously disturbed areas adjacent to and within the project area. For the demolition of the existing ATCT and base building, site access for the project would occur via Airport Boulevard West, west of the existing ATCT, and staging areas would consist of the existing parking lot. To provide uninterrupted air traffic control services, the existing ATCT and base building would be demolished after commissioning of the new ATCT is completed.

Area of Potential Effects

The Area of Potential Effects (APE), as defined at 36 CFR 800.16(d), is the geographic area or areas within which the undertaking may directly or indirectly cause alterations in the character or use of any historic properties. Actions that have the potential to affect historic properties include construction and ground disturbance as well as noise, vibration, and visual effects.

Based on the potential for direct and indirect effects, the APE for the proposed undertaking includes a 0.5-mile radius around the location of the proposed new ATCT and the existing SMF ATCT sites. Within the project area, construction, demolition, maintenance, and usage effects may occur (see Exhibit 1). New utilities would be placed from existing utility lines within the APE. Existing airport perimeter, maintenance, and public access roads would be used for construction and maintenance traffic.

The proposed ATCT would be visible from much of the surrounding area. The design intention for the proposed ATCT is to create an efficient, low maintenance facility which meets the operational requirements of the airport, harmonizes with the surrounding environment, and is consistent in character with the existing and proposed airport facilities.

Historic Property Identification

The SMF Airport was first established and began operation in 1967. Commissioned in 1967, the existing ATCT on the property is an I.M. Pei standard tower type. The Pei standard ATCT design consists of a non-occupied pentagonal cast-in-place concrete shaft supporting a pentagonal prefabricated, aluminum framed cab. The Pei standard ATCT design was constructed from the late 1960s into the early 1970s and derives its name from renowned architect I.M. Pei.

Booz Allen Hamilton (Booz Allen) prepared a report, *Airport Traffic Control Tower Replacement, Historic Resources Report for Sacramento International Airport (SMF), Sacramento, California*, evaluating the National Register eligibility of the existing SMF ATCT, administrative base building, and other historic-

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age resources on the airport property (see Exhibit 3). This report serves as the FAA's Section 106 identification and evaluation document pursuant to 36 CFR § 800.4 and supports the FAA's finding of effect determination under 36 CFR § 800.5. Booz Allen recommended the existing ATCT and base building as individually eligible for the National Register of Historic Places (NRHP) under Criteria A and C, and the United Cargo building and the former fire station, as not individually eligible for the NRHP. Due to previous ground disturbance within the project area, no archaeological work was recommended.

There are two archeological sites recorded within SMF Airport: P-34-005004, Reclamation District 1000, and P-34-005225, the Sacramento River Tribal Cultural Landscape. Due to routine construction and demolition at SMF, the two archeological sites are unlikely to yield new information in the future. Both sites are within the APE.

Assessment of Effects

Construction of the proposed ATCT would occur within the developed SMF airport property. The proposed site is located within the airport operations area at latitude 38° 42' 10.00" N, longitude 121° 35' 30.14" W. The existing ATCT and base building proposed for demolition are in the project area located at 5620 Alan Boyd Drive and are historic properties considered eligible for the NRHP. The demolition of the historic existing SMF ATCT and base building would constitute an adverse effect.

The proposed ATCT's construction would have no adverse effect on other historic-age resources remaining at SMF.

Construction of the proposed ATCT and demolition of the existing SMF ATCT and base building would occur within previously disturbed areas of the developed airport. Therefore, it is unlikely that undisturbed cultural resources remain within the project area. If, however, during construction or maintenance activities, any cultural resources are discovered, construction would cease and the appropriate state, federal, and tribal officials would be notified and given the opportunity to review, determine its significance, and implement any necessary mitigation measures.

The FAA proposes a Finding of Adverse Effect due to the proposed demolition of the NRHP eligible SMF ATCT and base building. In accordance with 36 CFR § 800.6, the FAA is consulting with you and other Section 106 consulting parties to develop and evaluate strategies to avoid, minimize, or mitigate adverse effects to this historic property, with the goal of developing a Memorandum of Agreement with the California State Historic Preservation Office (SHPO) and other potential consulting parties for mitigation of the adverse effect. This information would be shared with the public in the Final Supplemental Environmental Assessment.

Section 106 Consultation

In accordance with 36 CFR § 800.3, the FAA has identified the California SHPO as a Section 106 consulting party. The FAA identified and separately initiated consultation with the following federally and non-federally recognized Tribes with known interests in the area on October 21, 2025: Wilton Rancheria, United Auburn Indian Community of the Auburn Rancheria, Shingle Springs Band of Miwok Indians and Tsi-Akim Maidu of the Taylorsville Rancheria. On November 5, 2025, the Wilton Rancheria responded to the FAA's initiation of consultation stating that although the project is within the ancestral territory of the Wilton Rancheria, the Tribe does not have any comments and does not wish to open consultation at this time. On December 10, 2025, the Shingle Springs Band of Miwok Indians responded stating that the Tribe would like to be added as a consulting party in identifying any Tribal Cultural Properties that may exist within the APE. Concurrently with this submittal, the FAA continued consultation with the identified Tribes regarding the proposed project.

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The FAA is also initiating consultation with the Sacramento County Department of Airports, the Sacramento Historical Society, and the Center for Sacramento History. Invited parties have 30 days to respond and provide comments.

The FAA integrated the public involvement for this proposed undertaking with this project's NEPA process. Information on the Draft Environmental Assessment for the SMF ATCT is available through a dedicated website location at: https://www.faa.gov/air_traffic/atf.

Request for Comment and Concurrence

As outlined above, the purpose of this letter is to seek your concurrence with the APE and the FAA's Finding of Adverse Effect and invite your views on the effects. We request that you review the information and respond within 30 days of receiving this letter. If you should need any further information or wish to discuss the project, please contact Patrick Walsh at (206) 231-2695 or Patrick.Walsh@FAA.gov.

Sincerely,

Vincent Nguyen

On behalf of Patrick Walsh
Lead General Engineer/Environmental Engineer
Federal Aviation Administration
AJW-2W16E – EOSH Support Center

CC: Monica Newman, Executive Secretary, Office of Historic Preservation

Enclosures

Exhibit 1 – Project Area and Area of Potential Effects
Exhibit 2 – Site Plans
Exhibit 3 – *Airport Traffic Control Tower Replacement, Historic Resources Report for Sacramento International Airport (SMF), Sacramento, California*

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