November 2025

Final Environmental Impact Report for the Airport Traffic Control Tower Replacement at Fresno Yosemite International Airport

City of Fresno
2600 Fresno Street
Fresno, California 93721

State Clearinghouse Number: 2024030739

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SCH: 2024030739

Prepared for

City of Fresno
2600 Fresno Street
Fresno, California 93721

Prepared by
RS&H California, Inc.

November 2025

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Table of Contents

Glossary and Abbreviations x
Executive Summary ES-1
ES.1 Background ES-1
ES.2 Project Objective ES-1
ES.3 Proposed Project ES-1
ES.4 Alternatives ES-1
ES.5 Environmental Impacts ES-1
1 Introduction 1-1
1.1 Purpose of the EIR 1-1
1.2 Environmental Impact Report Process 1-2
1.2.1 Notice of Preparation 1-2
1.2.2 Draft Environmental Impact Report and Public Review 1-2
1.2.3 Response to Comments; Final Environmental Impact Report; Project Approval 1-2
1.2.4 Notice of Determination 1-3
1.2.5 CEQA Findings and Mitigation Monitoring 1-3
1.2.6 Proposed Project Overview 1-3
1.3 Initial Study Findings 1-3
1.4 Agencies That May Use This EIR 1-4
1.5 Related National Environmental Policy Act (NEPA) Review 1-4
1.6 Organization of This EIR 1-5
1.7 Revisions Made to the Draft EIR 1-6
1.7.1 General Revisions Made Throughout the EIR 1-6
1.7.2 Table of Contents 1-6
1.7.3 Executive Summary 1-6
1.7.4 Chapter 1, Introduction 1-6
1.7.5 Chapter 2, Project Description 1-7
1.7.6 Chapter 3, Existing Conditions, Environmental Impacts, and Mitigation Measures 1-7
1.7.7 Chapter 4, Alternatives 1-8
1.7.8 Chapter 5, Impact Overview 1-8
1.7.9 Chapter 6, Public Outreach and Coordination 1-8
1.7.10 Chapter 7, References 1-9
1.7.11 Chapter 8, List of Preparers 1-9

1.7.12 Appendices 1-9
2 Project Description 2-1
2.1 Introduction 2-1
2.2 Project Location 2-1
2.3 Existing Airport 2-1
2.3.1 Existing Airport Traffic Control Tower 2-1
2.3.2 Airport Operations 2-5
2.4 Forecasts 2-5
2.5 Project Objective 2-6
2.6 Proposed Project 2-9
2.6.1 Construct New ATCT Facility and Demolish Existing ATCT Facility 2-9
2.6.2 Install New Equipment and Utility Services 2-9
2.6.3 Reconstruct Employee Parking Lot and Install Security Fencing 2-11
2.7 Staging of the Proposed Project 2-11
3 Existing Conditions, Environmental Impacts, and Mitigation Measures 3-1
3.1 Introduction 3-1
3.2 Aesthetics 3-3
3.2.1 Regulatory Setting 3-3
3.2.2 Significance Thresholds 3-5
3.2.3 Methodology 3-5
3.2.4 Existing Conditions / Environmental Setting 3-5
3.2.5 Environmental Impacts and Mitigation 3-6
3.3 Agriculture / Forest Resources 3-8
3.3.1 Regulatory Setting 3-8
3.3.2 Significance Thresholds 3-9
3.3.3 Methodology 3-9
3.3.4 Existing Conditions / Environmental Setting 3-10
3.3.5 Environmental Impacts and Mitigation 3-10
3.4 Air Quality 3-12
3.4.1 Regulatory Setting 3-12
3.4.2 Significance Thresholds 3-16
3.4.3 Methodology 3-17
3.4.4 Existing Conditions / Environmental Setting 3-18
3.4.5 Environmental Impacts and Mitigation 3-19

3.5 Biological Resources 3-24
3.5.1 Regulatory Setting 3-24
3.5.2 Significance Thresholds 3-28
3.5.3 Methodology 3-28
3.5.4 Existing Conditions / Environmental Setting 3-29
3.5.5 Environmental Impacts and Mitigation 3-29
3.6 Cultural and Tribal Resources 3-33
3.6.1 Regulatory Setting 3-33
3.6.2 Significance Thresholds 3-37
3.6.3 Methodology 3-38
3.6.4 Existing Conditions / Environmental Setting 3-39
3.6.5 Environmental Impacts and Mitigation 3-39
3.7 Energy 3-43
3.7.1 Regulatory Setting 3-43
3.7.2 Significance Thresholds 3-46
3.7.3 Methodology 3-46
3.7.4 Existing Conditions / Environmental Setting 3-47
3.7.5 Environmental Impacts and Mitigation 3-48
3.8 Geology and Soils 3-50
3.8.1 Regulatory Setting 3-50
3.8.2 Significance Thresholds 3-51
3.8.3 Methodology 3-52
3.8.4 Existing Conditions / Environmental Setting 3-52
3.8.5 Environmental Impacts and Mitigation 3-54
3.9 Greenhouse Gas Emissions 3-58
3.9.1 Regulatory Setting 3-58
3.9.2 Significance Thresholds 3-62
3.9.3 Methodology 3-63
3.9.4 Existing Conditions / Environmental Setting 3-64
3.9.5 Environmental Impacts and Mitigation 3-64
3.10 Hazards and Hazardous Materials 3-67
3.10.1 Regulatory Setting 3-67
3.10.2 Significance Thresholds 3-74
3.10.3 Methodology 3-75

3.10.4 Existing Conditions / Environmental Setting 3-75
3.10.5 Environmental Impacts and Mitigation 3-77
3.11 Hydrology and Water Quality 3-82
3.11.1 Regulatory Setting 3-82
3.11.2 Significance Thresholds 3-89
3.11.3 Methodology 3-89
3.11.4 Existing Conditions / Environmental Setting 3-90
3.11.5 Environmental Impacts and Mitigation 3-94
3.12 Land Use and Planning 3-99
3.12.1 Regulatory Setting 3-99
3.12.2 Significance Thresholds 3-100
3.12.3 Methodology 3-101
3.12.4 Existing Conditions / Environmental Setting 3-101
3.12.5 Environmental Impacts and Mitigation 3-101
3.13 Mineral Resources 3-102
3.13.1 Regulatory Setting 3-102
3.13.2 Significance Thresholds 3-103
3.13.3 Methodology 3-103
3.13.4 Existing Conditions / Environmental Setting 3-103
3.13.5 Environmental Impacts and Mitigation 3-103
3.14 Noise 3-104
3.14.1 Background 3-104
3.14.2 Regulatory Setting 3-106
3.14.3 Significance Thresholds 3-110
3.14.4 Methodology 3-111
3.14.5 Existing Conditions / Environmental Setting 3-111
3.14.6 Environmental Impacts and Mitigation 3-112
3.15 Population and Housing 3-114
3.15.1 Regulatory Setting 3-114
3.15.2 Significance Thresholds 3-115
3.15.3 Methodology 3-115
3.15.4 Existing Conditions / Environmental Setting 3-115
3.15.5 Environmental Impacts and Mitigation 3-115
3.16 Public Services 3-117

3.16.1 Regulatory Setting 3-117
3.16.2 Significance Thresholds 3-118
3.16.3 Methodology 3-118
3.16.4 Existing Conditions / Environmental Setting 3-119
3.16.5 Environmental Impacts and Mitigation 3-119
3.17 Recreation 3-121
3.17.1 Regulatory Setting 3-121
3.17.2 Significance Thresholds 3-122
3.17.3 Methodology 3-122
3.17.4 Existing Conditions / Environmental Setting 3-122
3.17.5 Environmental Impacts and Mitigation 3-123
3.18 Transportation 3-124
3.18.1 Regulatory Setting 3-124
3.18.2 Significance Thresholds 3-125
3.18.3 Methodology 3-126
3.18.4 Existing Conditions / Environmental Setting 3-126
3.18.5 Environmental Impacts and Mitigation 3-126
3.19 Utilities / Service Systems 3-128
3.19.1 Regulatory Setting 3-128
3.19.2 Significance Thresholds 3-131
3.19.3 Methodology 3-131
3.19.4 Existing Conditions / Environmental Setting 3-131
3.19.5 Environmental Impacts and Mitigation 3-133
3.20 Wildfire 3-136
3.20.1 Regulatory Setting 3-136
3.20.2 Significance Thresholds 3-136
3.20.3 Methodology 3-137
3.20.4 Existing Conditions / Environmental Setting 3-137
3.20.5 Environmental Impacts and Mitigation 3-137
4 Alternatives 4-1
4.1 Alternatives Screening Process 4-1
4.1.1 Factor 1 Screening: Meeting Project Objectives 4-2
4.1.2 Factor 2 Screening: Constructability, Cost, and Airfield Operational Functionality Considerations 4-2

4.1.3 Factor 3 Screening: Environmental Impacts 4-3
4.2 Alternatives Development 4-3
4.2.1 Alternative 1: Site X2 (Proposed Project) 4-4
4.2.2 Alternative 2: Rehabilitate Existing ATCT for Continued Use at FAT 4-7
4.2.3 Alternative 3: Site X1 4-7
4.2.4 Alternative 4: Site 13A 4-7
4.2.5 Alternative 5: Site 6 4-8
4.2.6 Alternative 6: Across the Airfield from the Existing ATCT 4-8
4.2.7 No Project Alternative 4-8
4.3 Alternatives Screening 4-9
4.3.1 Factor 1 Screening 4-9
4.3.2 Factor 2 Screening 4-14
4.3.3 Factor 3 Screening 4-17
4.4 No Project Alternative 4-18
4.4.1 Environmental Impacts 4-18
4.5 Environmentally Superior Alternative 4-21
5 Impact Overview 5-1
5.1 Significant and Unavoidable Adverse Impacts 5-1
5.2 Significant Irreversible Environmental Changes 5-1
5.3 Growth-Inducing Impacts 5-1
5.3.1 Elimination of Obstacles to Population Growth 5-2
5.3.2 Growth Inducement 5-2
5.4 Cumulative Impacts 5-3
5.4.1 Aesthetics 5-3
5.4.2 Agriculture / Forest Resources 5-3
5.4.3 Air Quality 5-3
5.4.4 Biological Resources 5-6
5.4.5 Cultural and Tribal Resources 5-6
5.4.6 Energy 5-6
5.4.7 Geology and Soils 5-7
5.4.8 Greenhouse Gas Emissions 5-7
5.4.9 Hazards and Hazardous Materials 5-7
5.4.10 Hydrology and Water Quality 5-8
5.4.11 Land Use and Planning 5-8

5.4.12 Mineral Resources 5-9
5.4.13 Noise 5-9
5.4.14 Population and Housing 5-9
5.4.15 Public Services 5-9
5.4.16 Recreation 5-9
5.4.17 Transportation 5-10
5.4.18 Utilities / Service Systems 5-10
5.4.19 Wildfire 5-11
6 Public Outreach and Coordination 6-1
6.1 Public Outreach Efforts 6-1
6.1.1 Scoping 6-1
6.1.2 Draft Environmental Impact Report 6-1
7 References 7-1
1.1 Introduction Chapter 7-1
1.2 Project Description Chapter 7-1
1.3 Existing Conditions, Environmental Impacts, and Mitigation Measures Chapter 7-1
1.4 Alternatives Chapter 7-8
1.5 Impact Overview Chapter 7-8
1.6 Public Outreach and Coordination Chapter 7-9
1.7 List of Preparers Chapter 7-9
8 List of Preparers 8-1
8.1 City of Fresno 8-1
8.1.1 Fresno Yosemite International Airport 8-1
8.1.2 Planning and Development 8-1
8.2 RS&H California, Inc. 8-1

List of Tables

Table ES-1: Summary of Environmental Impact Levels of Significance and Mitigation Measures ES-2
Table 1-1: Anticipated Project Approvals 1-4
Table 2-1: Fresno Yosemite International Airport Operations and Enplanements 2-6
Table 2-2: Fresno Yosemite International Airport Forecast 2-6
Table 2-3: Anticipated Construction Schedule of the Proposed Project 2-12

Table 3-1: Federal and State Ambient Air Quality Standards 3-13

Table 3-2: Estimated Operational Pollutant Emissions from the Existing ATCT (tons per year)..... 3-19

Table 3-3: De Minimis Emission Thresholds 3-20

Table 3-4: Total Annual Construction Emissions of Proposed Project Compared to NAAQS and SJVAPCD Standards (tons per year) 3-21

Table 3-5: Operation Emissions Estimates and Net Change from Existing Emissions Estimates Compared to NAAQS and SJVAPCD Standards (tons per year)..... 3-22

Table 3-6: Federal and State Candidate, Sensitive, or Special Status Species in the Clovis Quadrangle 3-30

Table 3-7: Estimated Operational Greenhouse Gas Emissions from the Existing ATCT (Metric tons per year)..... 3-64

Table 3-8: Proposed Project Construction-Related Greenhouse Gas Emissions (Metric tons per year) 3-65

Table 3-9: Operation GHG Emissions Estimates and Net Change from Existing GHG Emissions Estimates (Metric tons per year) 3-65

Table 3-10: Potential Pollutants and Pollutant Sources from Industrial Activities..... 3-93

Table 3-11: Common Outdoor and Indoor Noise Levels..... 3-105

Table 3-12: Federal Vibration Damage Thresholds of Significance for Land use..... 3-107

Table 3-13: Federal Vibration Annoyance Thresholds of Significance for Land Use..... 3-107

Table 3-14: Ambient Noise Levels..... 3-110

Table 4-1: Factor 1 Screening Results 4-15

Table 4-2: Factor 2 Screening Results 4-17

Table 4-3: Factor 3 Screening Results 4-18

Table 5-1: Cumulative Projects 5-5

List of Figures

Figure 2-1: Airport Location..... 2-2

Figure 2-2: Existing Airport Traffic Control Tower at Fresno Yosemite International Airport 2-3

Figure 2-3: View of Existing Airport Traffic Control Tower Facility 2-4

Figure 2-4: Proposed Project 2-10

Figure 2-5: Proposed Haul Routes..... 2-13

Figure 3-1: Project Study Area 3-2

Figure 3-2: Existing Surface Waters..... 3-91

Figure 3-3 Existing Floodplains 3-95
Figure 4-1: Alternatives Considered 4-5
Figure 5-1: Cumulative Study Area 5-4

Appendices

Appendix A: Notice of Preparation and Scoping Comments
Appendix B: Air Quality Detailed Emissions Inventory
Appendix C: Cultural and Tribal Resources
Appendix D: Phase I Environmental Site Assessment
Appendix E: Notice of Availability and Response to Comments
Appendix F: Mitigation Monitoring and Report Program

Glossary and Abbreviations

#

μg/m^3 – micrograms per cubic meter

A

AB – Assembly Bill

AC – Advisory Circular

ACM – Asbestos Containing Material

ADA – Americans with Disability Act

ADAP – Airport Development Aid Program

AHERA – Asbestos Hazard Emergency Response Act

AIA – Airport Influence Area

Airport – Fresno Yosemite International Airport

ALP – Airport Layout Plan

ALUC – Airport Land Use Commission

ALUCP – Airport Land Use Compatibility Plan

ANCA – Airport Noise and Capacity Act of 1990

AOA – Airport Operations Area

APE – Area of Potential Effects

APS – Alternative Planning Strategy

ARFF – Aircraft Rescue and Firefighting Station

ASCE – American Society of Civil Engineers

ASHRAE – American Society of Heating, Refrigerating, and Air-Conditioning Engineers

AST – Aboveground Storage Tank

ATC – Air Traffic Control

ATCT – Airport Traffic Control Tower

ATP – Airport Terminal Program

B

BAAQMD – Bay Area Air Quality Management District

Basin Plan – Central Valley Regional Water Quality Control Board Plan

BFE – Base Flood Elevation

bgs – below ground surface

BMP – Best Management Practice

C

CAA – Clean Air Act

CAAA – Clean Air Act Amendments of 1990

CAAQS – California Ambient Air Quality Standards

CAL FIRE – California Department of Forestry and Fire Protection

CalEEMod – California Emissions Estimator Model

CalEPA – California Environmental Protection Agency

CALGreen – California Green Building Standards Code

Cal/OSHA – California Occupational Safety and Health Administration

CalRecycle – California Department of Resources Recycling and Recovery

Caltrans – California Department of Transportation

CAP – Climate Action Plan

CARB – California Air Resources Board

CARE – Community Air Risk Evaluation

CBC – California Building Code

CCAA – California Clean Air Act

CCAP – Climate Change Action Plan

CCR – California Code of Regulations

CDFW – California Depart of Fish and Wildlife

CEC – California Energy Commission

CEI – Construction Emissions Inventory

CESA – California Endangered Species Act

CEQA – California Environmental Quality Act

CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act of 1980, also called the Superfund Act

CERS – California Environmental Reporting System

CFGC – California Fish and Game Commission

CFR – Code of Federal Regulation

CGP – Construction General Permit

CGS – California Geological Survey

CH_4 – Methane

CIP –Capital Improvement Program

City – City of Fresno

CIWMA – California Integrated Waste Management Act of 1989

CIWMB – California Integrated Waste Management Board

cm – centimeter

CNEL – Community Noise Equivalent Level

CNPS – California Native Plant Society

CO – Carbon Monoxide

CO_2 – Carbon Dioxide

CO_2e – Carbon Dioxide Equivalent

COG – Council of Governments

CPUC – California Public Utilities Commission

CRHR – California Register of Historical Resources

CRPR – California Rare Plant Ranks

CUPA – Fresno Certified Unified Public Agency

CVRWQCB – Central Valley Regional Water Quality Control Board

CWA – Clean Water Act

D

dB – decibels

dBA – A-weighted sound level

DNL – Day-Night Average Sound Level

DOD – Department of Defense

DPU – Department of Public Utilities

DTSC – Department of Toxic Substances Control

DWR – California Division of Water Resources

E

EIR – Environmental Impact Report

EPCRA – Emergency Planning and Community Right-to-Know Act

ESA – Endangered Species Act

EV – Electric Vehicle

F

F.G.C. – California Fish and Game Code

FAA – Federal Aviation Administration

FAIA – Fellow of the American Institute of Architects

FAR – Federal Aviation Regulations

FAT – Fresno Yosemite International Airport

FBO – Fixed Base Operators

FCOG – Fresno County Council of Governments

FEMA – Federal Emergency Management Agency

FFD – City of Fresno Fire Department

FID – Fresno Irrigation District

FIRM – Flood Insurance Rate Map

FMFCD – Fresno Metropolitan Flood Control District

FMMP – Farmland Mapping and Monitoring Program

FOE – Finding of Effect

FPPA – Farmland Protection Policy Act

ft – feet

FTA – Federal Transit Administration

G

GA – General Aviation

GHG – Greenhouse Gas

GSA – Groundwater Sustainability Agency

GSP – Groundwater Sustainability Plan

GWP – Global Warming Potential

H

HABS – Historic American Building Survey

HAP – Hazardous Air Pollutants

HAZWOPER – Hazardous Waste Operations and Emergency Response

HCP – PG&E San Joaquin Valley Operation and Maintenance Habitat Conservation Plan

HFC – Hydrofluorocarbons

HMBP – Hazardous Materials Business Plan

HMMP – Hazardous Materials Management Plan

HMRT – Hazardous Materials Response Team

HMTA – Hazardous Materials Transportation Act of 1975

HMTUSA – Hazardous Materials Transportation Uniform Safety Act

HPC – City of Fresno Historic Preservation Commission

HSWA – Hazardous and Solid Waste Amendments of 1984

HVAC – Heating, Ventilation and Air Conditioning

HWCL – Hazardous Waste Control Law

I

IEPR – Integrated Energy Policy Report

Ignitability – ability to ignite by open flame

IGP – Industrial General Permit

IRA – Inflation Reduction Act of 2022

L

LBP – Lead-based Paint

Ldn – Day-Night Average Sound Level

LEA – law enforcement agencies

LEED™ – Leadership in Energy Efficient Design

L_{max} – Maximum sound level

LOS – Level of Service

LPG – Liquified Petroleum Gas

LUST – Leaking Underground Storage Tank

LWCF – Land and Water Conservation Fund

M

m – meter

mg – milligram

mgd – million gallons per day

MLD – Most Likely Descendant

MMRP – Mitigation Monitoring and Reporting Plan

MOA – Memorandum of Agreement

MPO – Metropolitan Planning Organization

MRZ – Mineral Resource Zone

MS4 – municipal separate storm sewer system

$mtCO_2e$ – metric tons of carbon dioxide equivalents

MY – model year

N

N_2O – Nitrogen

NAAQS – National Ambient Air Quality Standards

NAHC – Native American Heritage Commission

NAL – numeric action level

NEHRP – National Earthquake Hazards Reduction Program

NEPA – National Environmental Policy Act

NESHAP – National Emissions Standards for Hazardous Air Pollutants

NESWTF – Northeast Surface Water Treatment Facility

NFHL – National Flood Hazard Layer

NFIP – National Flood Insurance Program

NHPA – National Historic Preservation Act

NMFS – National Marine Fisheries Service

NO_2 – Nitrogen Dioxide

NOD – Notice of Determination

NOP – Notice of Preparation

NO_X – Nitrogen Oxides

NPDES – National Pollutant Discharge Elimination System

NPIAS – National Plan of Integrated Airports Systems

NPL – Federal National Priorities List

NRHP – National Register of Historic Places

O

O_3 – Ozone

OEHHA – California Office of Environmental Health Hazards Assessment

OPR – Governor's Office of Planning and Research

OSHA – Occupational Safety and Health Administration

P

Pb – Lead

PCB – Polychlorinated Biphenyls

PCE – tetrachloroethylene

PDT – Pacific Daylight Time

PEIR – City of Fresno General Plan Program Environmental Impact Report

PFAS – Per- and Polyfluoroalkyl Substances

PFOA – Perfluorooctanoic Acid

PG&E – Pacific Gas & Electric Company

Phase I ESA – Phase I Environmental Site Assessment

PM – Particulate Matter

ppm – parts per million

PPV – peak particle velocity

PQS – Professionally Qualified Staff

PRC – Public Resource Code

Q

QSD – Qualified SWPPP Developer

QSP – Qualified SWPP Practitioner

R

RCRA – Resource Conservation and Recovery Act of 1976

Reactivity – ability for materials and waste to generate vapors when mixed with water

ROG – Reactive Organic Gases

RTP – Regional Transportation Plan

RTR – remote transmitter/receivers

RWQCB – Regional Water Quality Control Board

RWRF – Fresno-Clovis Regional Wastewater Facility

S

SARA – Superfund Amendments and Reauthorization Act of 1986

SB – Senate Bill

SCS – Sustainable Communities Strategy

SDFCMP – Storm Drainage and Flood Control Master Plan

SDWA – Safe Drinking Water Act

SESWTF – Southeast Surface Water Treatment Facility

SFHA – Special Flood Hazard Area

SGMA – Sustainable Groundwater Management Act

SHMA – Seismic Hazards Mapping Act

SHPO – State Historic Preservation Officer

SIP – State Implementation Plan

SJVAB – San Joaquin Valley Air Basin

SJVAPCD – San Joaquin Valley Air Pollution Control District

SMARA – Surface Mining and Reclamation Act

SPCC – Spill Prevention, Control, and Countermeasure

sq ft – square feet

SR – State Route

SSO – sanitary sewer overflow

SSMP – Sewer System Management Plans

SO_2 – Sulfur Dioxide

SO_X – Sulfur

SWPPP – Stormwater Pollution Prevention Plan

SWRCB – California State Water Resources Control Board

T

TAF – Terminal Area Forecast

TCE – trichloroethylene

Tech Ops – FAA Technical Operation

THPO – Tribal Historic Preservation Officer

TMDL – Total Maximum Daily Load

Toxicity – ability to be poisonous

TRACON – Terminal Radar Approach Control

TSA – Transportation Security Administration

TSCA – Toxic Substances Control Act

U

U.S. DOT – U.S. Department of Transportation

UWMP – Urban Water Management Plan

USC – United States Code

USDA – U.S. Department of Agriculture

USEPA – U.S. Environmental Protection Agency

USFWS – U.S. Fish and Wildlife Service

USGS – U.S. Geological Survey

UST – Underground Storage Tanks

V

VdB – vibration decibels

VHFHSZ – Very High Fire Hazard Severity Zone

VMT – Vehicle Miles Traveled

W

Waveforms – minute vibrations

WMD – Wastewater Management Division

Executive Summary

ES.1 Background

The purpose of this Environmental Impact Report (EIR) is to analyze the potential environmental impacts of the implementation of the Airport Traffic Control Tower (ATCT) Replacement (Proposed Project) at the Fresno Yosemite International Airport (FAT or Airport).

ES.2 Project Objective

In compliance with Section 15124(b) of the CEQA Guidelines, the City is required to identify its objective(s) associated with the Proposed Project. The City has identified the following objective to be achieved through the implementation of the Proposed Project.

> Provide an ATCT facility that meets current FAA, State, and local building standards and improves safety and operations at the Airport for ATCT operators and Airport users.

ES.3 Proposed Project

The Proposed Project is the replacement of the existing ATCT facility and associated infrastructure at the Airport.

The Proposed Project includes the following components:

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

ES.4 Alternatives

As required under Section 15126(d) of the CEQA Guidelines, an EIR must discuss a range of reasonable alternatives to the Proposed Project that potentially would feasibly attain most of the basic objectives of the project while avoiding or lessening significant environmental effects. The City considered other potential project alternatives, as discussed in **Chapter 4**; however, the Proposed Project was determined to be the Environmentally Superior Alternative.

ES.5 Environmental Impacts

The environmental impact analysis is based on changes that could occur as a result of implementation of the Proposed Project. **Table ES-1** presents the results of the environmental consequences analyses for the Proposed Project. For each environmental impact category, the table identifies whether any significant impacts would occur as a result of the Proposed Project. With implementation of mitigation measures, one impact would be considered significant and unavoidable.

Table ES-1: Summary of Environmental Impact Levels of Significance and Mitigation Measures

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
Aesthetics			
3.2.5.1	Have a substantial adverse effect on a scenic vista	No impact	None
3.2.5.2	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	No impact	None
3.2.5.3	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality	No impact	None
3.2.5.4	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	Less than significant	None
Agriculture / Forest Resources			
3.3.5.1	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monito-ring Program of the California Resources Agency, to non-agricultural use	No impact	None
3.3.5.2	Conflict with existing zoning for agricultural use, or a Williamson Act contract	No impact	None
3.3.5.3	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in	No impact	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
	Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))		
3.3.5.4	Result in the loss of forest land or conversion of forest land to non-forest use	Less than significant	None
3.3.5.5	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use	Less than significant	None
Air Quality			
3.4.5.1	Conflict with or obstruct implementation of the applicable air quality plan	Less than significant	None
3.4.5.2	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	Less than significant	None
3.4.5.3	Expose sensitive receptors to substantial pollutant concentrations	Less than significant	None
3.4.5.4	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	No impact	None
Biological Resources			
3.5.5.1	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish	No impact	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
	and Game or U.S. Fish and Wildlife Service		
3.5.5.2	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service	No impact	None
3.5.5.3	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	No impact	None
3.5.5.4	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	No impact	None
3.5.5.5	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	No impact	None
3.3.5.6	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan	No impact	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
Cultural and Tribal Resources			
3.6.5.1	Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5	Significant and unavoidable	Mitigation Measure CUL-1: Execution of a Memorandum of Agreement MOA Measure 1: Prepare documentation of the existing ATCT to meet modified Historic American Building Survey (HABS) Level II-like standards. Submit the HABS documentation to the State Historic Preservation Officer (SHPO), the Fresno County Historical Society, and the Fresno County Public Library. MOA Measure 2: Prepare and provide educational information to the public regarding the existing ATCT in the form of interpretive signage to be placed within the Airport terminal building. The interpretive sign will include a narrative historic context, historic photographs, and, if feasible, salvaged architectural elements of the existing ATCT. MOA Measure 3: Prepare and provide educational information to the public regarding the existing ATCT in the form of an exhibit at a Fresno County Historical Society building and electronically provided education materials to the Fresno County Historical Society. The exhibit and materials will focus on the history and importance of the ATCT as an International style building designed by the prominent architect, Allen Y. Lew. The exhibit and materials will include narrative historic context and historic photographs. MOA Measure 4: Prepare a historic context for posting on the City website that discusses the development of the existing ATCT and the background and importance of the architect who designed the ATCT.
3.6.5.2	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5	Less than significant with mitigation incorporated	Mitigation Measure CUL-2: Inadvertent Discovery of Archaeological Resources If previously unknown resources are discovered during construction, all earth-moving activity within and around the

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
			immediate discovery area will be halted until a qualified archaeologist assesses the nature and significance of the find. If there is ever any doubt or confusion upon discovery of cultural materials, the contractor supervisor and crew should temporarily halt work until the proper personnel can be notified and the situation clarified. If the discovered resources are determined to be potentially eligible for listing in the CRHR, then they must be addressed under the procedures set forth in CEQA Guidelines Section 15064.5. If significant resources are encountered and avoidance is infeasible, then data recovery through excavation will be conducted. If the cultural materials are of Native American origin, the Airport will contact the Native American Heritage Commission (NAHC) and a data recovery plan will be prepared and implemented.
3.6.5.3	Disturb any human remains, including those interred outside of formal cemeteries	Less than significant with mitigation incorporated	Mitigation Measure CUL-3: Inadvertent Discovery of Human Remains If human remains are discovered, Health and Safety Code Section 7050.5 requires that further disturbances and activities must cease in the vicinity of the discovery and the county coroner must be contacted. Pursuant to Public Resources Code (PRC) Section 5097.98, if the remains are thought to be Native American, the coroner must notify the NAHC, who must then notify the Most Likely Descendent.
3.6.5.4	Cause a substantial adverse change in the significance of a tribal resource	Less than significant with mitigation incorporated	Mitigation Measure CUL-4: Inadvertent Discovery of Tribal Resources Same mitigation measures as identified in Mitigation Measure CUL-2: Inadvertent Discovery of Archaeological Resources
Energy			
3.7.5.1	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of	Less than significant	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
	energy resources, during project construction or operation		
3.7.5.2	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	No impact	None
Geology and Soils			
3.8.5.1	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	-	-
-	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42	No impact	None
-	Strong seismic ground shaking	Less than significant	None
-	Seismic-related ground failure, including liquefaction	Less than significant	None
-	Landslides	No impact	None
3.8.5.2	Result in substantial soil erosion or loss of topsoil	Less than significant	None
3.8.5.3	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse	Less than significant	None
3.8.5.4	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property	Less than significant	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
3.8.5.5	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water	No impact	None
3.8.5.6	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature	Less than significant with mitigation incorporated	Mitigation Measure GEO-1: Unanticipated Discovery of Paleontological Resources Subsequent to a preliminary City review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for unique paleontological/geological resources shall be conducted. The following procedures shall be followed: If unique paleontological/geological resources are not found during either the field survey or literature search excavation and/or construction activities can commence. In the event that unique paleontological/geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
			resources recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study. If unique paleontological/geological resources are found during the field survey or literature review, the resources shall be inventoried and evaluated for significance. If the resources are found to be significant, mitigation measures shall be identified by the qualified paleontologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include a paleontological monitor. The monitoring period shall be determined by the qualified paleontologist. If additional paleontological/geological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.
Greenhouse Gas Emissions			
3.9.5.3	Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment	Less than significant	None
3.9.5.4	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs	Less than significant	None
Hazards and Hazardous Materials			
3.10.5.1	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	Less than significant with mitigation incorporated	<u>Mitigation Measure HAZ-1: Hazardous Materials Plans.</u> • Hazardous Materials Management Plan (HMMP): describes the proper use, handling, and storage

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
			practices and procedures for hazardous materials management • Spill Prevention Control and Countermeasures (SPCC) Plan: details how project storage facilities for petroleum products would be constructed, operated, and maintained. • Site Management Plan (SMP): provides guidelines to protect human health during grading and construction activities will be prepared. • Hazardous Materials Contingency Plan (HMCP): address potential contamination in soil, soil vapor, and groundwater from releases on or near the Proposed Project, as well as the potential for existing hazardous materials on site (e.g., drums and tanks). • Health and Safety Plan (HASP): outline measures to protect construction workers and the public from exposure to hazardous materials during demolition and construction activities. <u>Mitigation Measure HAZ-2: Pre-Demolition Survey.</u> A pre-demolition survey will be performed to identify hazardous building materials including ACM, LBP, and PCBs. The results of the survey will determine what hazardous materials are present and be the basis for the development of a comprehensive Hazardous Materials Management Plan (HMMP). <u>Mitigation Measure HAZ-3: Limited Soil Investigation.</u> As recommended in the Phase I ESA and based on the results of the potential for ACM, LBP, PCBs, and PFAS identified within the Project Study Area, a limited soil investigation will be conducted prior to construction to evaluate and address hazardous materials in soil that could be disturbed through construction activities within the Project Study Area. The

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
			investigation will follow requirements of the SJVAPCD and a soil investigation plan will be developed by a qualified contractor prior to the start of any testing. The plan will identify the testing protocols, the locations where samples will be collected, the contaminants that will be tested for, and the standards used to determine if contamination is present. If contamination is found to exceed applicable regulatory thresholds, cleanup of contaminated sites, including the implementation of engineering controls, will be completed by the City before construction. <u>Mitigation Measure HAZ-4: Removal, Handling, Storage, Transport, Treatment and Disposal.</u> Materials identified during the pre-demolition survey will be abated prior to demolition and disposed of at a landfill authorized to accept such waste. Any project-related demolition activities that have the potential to expose construction workers and/or the public to ACMs, LBP, or PCBs will be conducted in accordance with applicable regulations. The removal, handling, storage, transport, and treatment or disposal of contaminated materials from the limited soil investigation will be subject to federal and State requirements related to hazardous waste. There are two operating commercial hazardous waste facilities in California. The Kettleman Hills facility is located in Kings County, approximately 60 miles from FAT and accepts solid, semi-solid, liquid hazardous, and extremely hazardous wastes. Kettleman Hills is the only facility in California that is permitted to dispose of PCBs. The facility is open and has capacity available (Department of Toxic Substances Control, 2025). <u>Mitigation Measure HAZ-5:</u> <u>Worker Hazardous Material Procedures Training.</u> Prior to construction, workers will be trained in hazardous material procedures by a HAZWOPER-certified trainer selected by the

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
			contractor and approved by the City to minimize the potential exposure of the public and site workers to potential hazardous materials.
3.10.5.2	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment	Less than significant with mitigation incorporated	The same measures listed above for **Section 3.10.5.1** would apply.
3.10.5.3	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school	No impact	None
3.10.5.4	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment	No impact	None
3.10.5.5	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area	Less than significant	None
3.10.5.6	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	Less than significant	None
3.10.5.7	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires	No impact	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
Hydrology and Water Quality			
3.11.5.1	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality	Less than significant	None
3.11.5.2	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin	Less than significant	None
3.11.5.3	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces that would:	-	-
-	Result in substantial erosion or siltation on- or off-site	Less than significant	None
-	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site	Less than significant	None
-	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff	Less than significant	None
-	Impede or redirect flood flows	No impact	None
3.11.5.4	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation	No impact	None
3.11.5.5	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan	No impact	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
Land Use and Planning			
3.12.5.1	Physically divide an established community	No impact	None
3.12.5.2	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	No impact	None
Mineral Resources			
3.13.5.1	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state	No impact	None
3.13.5.2	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan	No impact	None
Noise			
3.14.6.1	Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards	Less than significant	None
3.14.6.2	Generate excessive groundborne vibration or groundborne noise levels	Less than significant	None
3.14.6.3	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels	Less than significant	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
Population and Housing			
3.15.5.1	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)	No impact	None
3.15.5.2	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere	No impact	None
Public Services			
3.16.5.1	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	-	-
-	Fire protection	No impact	None
-	Police protection	No impact	None
-	Schools	No impact	None
-	Parks	No impact	None
-	Other public facilities	No impact	None
Recreation			
3.17.5.1	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated	No impact	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
3.17.5.2	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment	No impact	None
Transportation			
3.18.5.1	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	No impact	None
3.18.5.2	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)	No impact	None
3.18.5.3	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	No impact	None
3.18.5.4	Result in inadequate emergency access	No impact	None
Utilities / Service Systems			
3.19.5.1	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects	Less than significant	None
3.19.5.2	Not having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years	No impact	None
3.19.5.3	A determination by the wastewater treatment provider, which serves or may serve the project that it does not have	No impact	None

Section of EIR	Impact	Level of Significance	Mitigation Measure(s)
	adequate capacity to serve the project's projected demand in addition to the provider's existing commitments		
3.19.5.4	Generate solid waste in excess of state or local standards, or in excess of the capacity to serve the project's projected demand in addition the provider's existing commitments	Less than significant	None
Wildfire			
3.20.5.1	Substantially impair an adopted emergency response plan or emergency evacuation plan	No impact	None
3.20.5.2	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire	No impact	None
3.20.5.3	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment	No impact	None
3.20.5.4	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes	Less than significant	None

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1 Introduction

1.1 Purpose of the EIR

The City of Fresno (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Environmental Impact Report (EIR) for the Airport Traffic Control Tower (ATCT) Replacement (Proposed Project) at the Fresno Yosemite International Airport (FAT or Airport) in compliance with CEQA and CEQA Guidelines. Because the Proposed Project would require discretionary approvals by the City, the Proposed Project is subject to CEQA. Based on the preparation of the Notice of Preparation (NOP) in March 2024, it was determined that the Proposed Project may have significant effect on the environment and that an EIR should be prepared pursuant to CEQA.

The City, which owns and operates the Airport, has commissioned the EIR for the following purposes:

- To evaluate the environmental effects associated with implementation of the Proposed Project, as required by CEQA;
- To inform the general public, the local community, and responsible federal, state, and local agencies of the nature of the Proposed Project, its potentially significant environmental effects, feasible mitigation measures to mitigate those effects, and its potentially reasonable and feasible alternatives;
- To enable the Fresno City Council to consider the environmental consequences of the Proposed Project; and
- To facilitate responsible agencies in issuing permits and approvals for the Proposed Project.

As described in CEQA and CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental impacts where feasible. Where impacts cannot be mitigated to less-than-significant levels, public agencies have an obligation to balance a project's significant impacts on the environment against other factors, including economics, social, technological, legal, and other benefits.

This EIR is an informational document, and it identifies the Proposed Project's potentially significant impacts on the environment, the manner in which those significant impacts can be avoided or significantly lessened, any significant and unavoidable impacts that cannot be mitigated, and a range of reasonable alternatives to the Proposed Project that potentially would feasible attain the project objectives but which would avoid or substantially lessen any of the project's significant environmental effects.

CEQA requires the Lead Agency to consider the information in an EIR, along with any other relevant information, in making its decision on a project. Although this EIR does not determine the ultimate decision (i.e., approval) regarding implementation of the Proposed Project, the City is required to consider the information in this EIR and to make findings regarding each significant effect that is identified in this EIR.

The City must certify the EIR before approving the Proposed Project. This EIR was prepared in accordance with Section 15151 of the CEQA Guidelines, which defines the standards for EIR adequacy as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and good faith effort at full disclosure.*

1.2 Environmental Impact Report Process

1.2.1 Notice of Preparation

Comments on the scope of this EIR were solicited from identified responsible and trustee agencies, as well as interested parties, through the publication of the NOP. The NOP was posted in the Fresno Bee, to the City's Planning and Development website, and the State Clearinghouse CEQAnet website on March 19, 2024, and circulated for a 30-day review period. The scoping period began on March 22, 2024, and comments were due to the City on April 22, 2024, at 5:00pm Pacific Daylight Time (PDT). A copy of the NOP and the comments received during the scoping period are included in **Appendix A**.

1.2.2 Draft Environmental Impact Report and Public Review

Publication of the Draft EIR began a public review and comment period. The City provided a 45-day review period, as required by Section 15105(a) of the CEQA Guidelines, that ran from September 10 to October 27, 2025. Upon publication, the Draft EIR was made available to federal, state, and local agencies as well as to interested organizations and members of the public for review. All written comments or questions about the Draft EIR could be addressed to the following:

Email: AirportEnvironmental@fresno.gov

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

1.2.3 Response to Comments; Final Environmental Impact Report; Project Approval

After the 45-day public comment period closed, the City responded to all written comments received on the Draft EIR. The Response to Comments was prepared as a separate document from the EIR and included in **Appendix E**. The Final EIR will be considered by the City Council

during a public hearing and will be certified if it is found to comply with CEQA. After certification of the Final EIR, the City will consider the merits of the Proposed Project for approval.

1.2.4 Notice of Determination

If the Proposed Project is approved, the City will file a Notice of Determination (NOD) within five business days, which will be available to the public and posted within 24 hours of receipt at the Fresno County Clerk-Recorder's Office for 30 days and on the State Clearinghouse CEQAnet website. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval of the Proposed Project under CEQA Guidelines Section 15094(g).

1.2.5 CEQA Findings and Mitigation Monitoring

CEQA requires that when a public agency approves a project and finds that changes or alterations have been incorporated into the project to mitigate and avoid the significant environmental effect identified in the EIR, the agency must also adopt a reporting or monitoring program for those measures that it has adopted or made a condition of project approval. Findings explain the connection between the analysis in the environmental document and the decisions by the decision-makers. The reporting or monitoring program must be designed to ensure compliance during project implementation. The mitigation monitoring and reporting program (MMRP) for this EIR was prepared and is included in **Appendix F**. The MMRP must be adopted concurrently with the certification of the Final EIR.

1.2.6 Proposed Project Overview

The Proposed Project is the replacement of the existing ATCT facility and associated infrastructure at the Airport. The Proposed Project would construct a new ATCT facility, install new equipment in the new ATCT and utility services to the new ATCT, reconstruct the existing employee parking lot, install security fencing around the new ATCT facility and accompanying employee parking lot, and demolish the existing ATCT once the new facility is fully operational. A detailed description of the Proposed Project is presented in **Chapter 2**.

1.3 Initial Study Findings

An Initial Study was prepared and included with the NOP in March 2024 (see **Appendix A**). Based in part on the Initial Study, the City found that preparation of the Draft EIR was required because the Proposed Project could have potentially significant impacts associated with the topics of aesthetics, air quality, cultural resources, geology, greenhouse gas emissions, hazardous materials, hydrology, noise, and energy and utilities. The Initial Study concluded that the below resources would not require further analysis in the Draft EIR; however, *South Fresno Community Alliance, Plaintiff and Appellant, v. City of Fresno, et al.* (2024; No. 21CECG03237), vacated the certification of the City's General Plan Program EIR (PEIR), of which the Initial Study cited, and each of these resources are evaluated in **Chapter 3** of this EIR.

- Agriculture and Forestry Resources
- Biological Resources
- Land Use/Planning
- Mineral Resources
- Population/Housing
- Public Services

- Recreation
- Transportation
- Wildfire

1.4 Agencies That May Use This EIR

The EIR is a public information document used in the planning and decision-making process. CEQA requires that all federal, state, and local agencies consider the environmental consequences of projects over which they have discretionary authority. The following agencies may use this EIR in connection with their decision-making on issuing discretionary approvals for this Proposed Project. The agencies and approvals for which these agencies are responsible are listed in **Table 1-1**.

Table 1-1: Anticipated Project Approvals

Agency(ies)	Approvals
City of Fresno	Building and Demolition Permits
Central Valley Regional Water Quality Control Board (CVRWQCB)	Construction General Permit *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ,* (CGP) identified as NPDES No. CAS000002
CVRWQCB	California State Water Resources Control Board (SWRCB) Industrial General Permit
Department of the Interior (DOI)	U.S. Department of Transportation (U.S. DOT), Section 4(f) Evaluation
Federal Aviation Administration (FAA)	Determinations under 49 United States Code (USC) §§ 47115 and 47124 associated with the eligibility of the Proposed Project for federal funding under the IIJA FAA FTC Grant Program and AIP discretionary grants
Fresno County Airport Land Use Commission (ALUC)	Consistency Determination
State Historic Preservation Officer (SHPO)	Finding of Effect (FOE) and Memorandum of Agreement (MOA) under Section 106 of the National Historic Preservation Act (NHPA)

Source: RS&H, 2025

1.5 Related National Environmental Policy Act (NEPA) Review

The Proposed Project would result in a change to the Airport Layout Plan (ALP) and may involve the use of Infrastructure Investment and Jobs Act (IIJA) FAA Contract Tower Competitive (FTC) Grant Program and Airport Improvement Program (AIP) discretionary grants (or other funds with federal oversight), which would require approval from the Federal Aviation Administration (FAA). As such, the Proposed Project also requires compliance with federal environmental laws and regulations. A separate environmental review document was prepared

pursuant to the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code [USC] §4321 et seq.); FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and FAA Order 5050.4B, *National Environmental Policy Act of 1969 (NEPA) Implementing Instructions for Airport Actions*. This separate environmental review document was available for public review from June 22 to August 5, 2025.

1.6 Organization of This EIR

This EIR is organized into the following chapters:

Executive Summary. This section provides an overview of the contents of the EIR.

Chapter 1: Introduction. This chapter provides an overview of the purpose of the EIR, a description of the intended uses of this EIR, the review and certification process, and a description of the organization of this EIR.

Chapter 2: Project Description. This chapter presents the objectives of the Proposed Project, a detailed description of the Proposed Project, and a listing of the permits and approvals required prior to the start of construction.

Chapter 3: Existing Conditions, Environmental Impacts, and Mitigation Measures. This chapter provides a description of the existing environmental conditions at the Airport and the environmental effects associated with the implementation of the Proposed Project. This chapter also presents an overview of the background and analytical methodology used in the analysis, provides the regulatory context for the condition or resource, and identifies the thresholds of significance used to determine the level of potential impacts, if any. In addition, if the analysis indicates that a significant impact would occur, mitigation measures are identified to reduce the impact to a non-significant level, if possible. Graphics and tables are included to clarify the analysis presented in this chapter.

Chapter 4: Alternatives. This chapter presents a description of the Proposed Project alternatives that were considered. A brief overview of the impacts associated with alternatives is included in this chapter.

Chapter 5: Impact Overview. This chapter identifies the significant and unavoidable adverse impacts, the significant irreversible environmental changes, and any growth-inducing impacts that might occur as a result of the implementation of the Proposed Project.

Chapter 6: Public Outreach and Coordination. This chapter identifies the public outreach efforts that were conducted for this EIR.

Chapter 7: References. This chapter identifies the reference materials that have been used to prepare this EIR.

Chapter 8: List of Preparers. This chapter presents the names and qualifications of persons who assisted in the preparation of this EIR.

Appendices. These sections present relevant material and technical reports that were used as a basis for or developed as part of the preparation of this EIR.

1.7 Revisions Made to the Draft EIR

The following changes were made to the Draft EIR and incorporated as part of the Final EIR. New text is double-underlined and deleted text is shown with a strikethrough.

1.7.1 General Revisions Made Throughout the EIR

"Draft" has been removed from before "EIR" in all cases except when directly referring to the release and comment period of the Draft EIR.

1.7.2 Table of Contents

The table of contents was updated to include any revisions to section numbers, tables, and figures identified throughout **Section 1.7**.

1.7.2.1 Appendices

The list of appendices was updated to correct the name of Appendix C from Cultural Resources Assessment and Memorandum of Agreement to Cultural and Tribal Resources.

Appendix E, Notice of Availability and Response to Comments, and Appendix F, Mitigation Monitoring and Report Program, were added to the list of appendices.

1.7.3 Executive Summary

No revisions were made to the Executive Summary.

1.7.4 Chapter 1, Introduction

Section 1.2.2 was updated as follows:

> Publication of the Draft EIR ~~will begin~~ began a public review and comment period. The City ~~is providing~~ provided a 45-day review period, as required by Section 15105(a) of the CEQA Guidelines, that ran from September 10 to October 27, 2025. Upon publication, the Draft EIR ~~will be~~ was made available to federal, state, and local agencies as well as to interested organizations and members of the public for review. All written comments or questions about the Draft EIR ~~can~~ could be addressed to the following:
>
> Email: AirportEnvironmental@fresno.gov
>
> Mail: Fresno-Yosemite International Airport
> ATTN: Francisco Partida
> Address: 4995 East Clinton Way
> Fresno, California 93727

Section 1.2.3, Responses to Comments; Final Environmental Impact Report; Project Approval, was updated as follows:

> After the 45-day public comment period ~~closes~~ closed, the City ~~will~~ responded to all written comments received on the Draft EIR. The Response to Comments ~~will be~~ was prepared as a separate document from the EIR and included in **Appendix E**. The Final EIR will be considered by the City Council during a public hearing and will be certified if it

is found to comply with CEQA. After certification of the Final EIR, the City will consider the merits of the Proposed Project for approval.

Section 1.2.5, CEQA Findings and Mitigation Monitoring, was updated as follows:

> CEQA requires that when a public agency approves a project and finds that changes or alterations have been incorporated into the project to mitigate and avoid the significant environmental effect identified in the EIR, the agency must also adopt a reporting or monitoring program for those measures that it has adopted or made a condition of project approval. Findings explain the connection between the analysis in the environmental document and the decisions by the decision-makers. The reporting or monitoring program must be designed to ensure compliance during project implementation. The mitigation monitoring and reporting program (MMRP) for this EIR ~~will be~~ was prepared ~~at the time the Final EIR is prepared~~ and is included in Appendix F. The MMRP must be adopted concurrently with the certification of the Final EIR.

Section 1.7, Revisions Made to the Draft EIR, was added to summarize any revisions made to the Draft EIR following the public comment period.

1.7.5 Chapter 2, Project Description

No revisions were made to Chapter 2.

1.7.6 Chapter 3, Existing Conditions, Environmental Impacts, and Mitigation Measures

1.7.6.1 Section 3.10, Hazards and Hazardous Materials

Section 3.10.5.1, Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, paragraph 1 was revised as follows:

> Construction of the Proposed Project would include the use of lubricants and fuels for the operation of construction vehicles and equipment. In addition, construction of the Proposed Project would involve the use, transport, and disposal of the hazardous materials, including paints, solvents, coatings, cement, glues, lubricants, and fuels. The Phase I ESA identified the potential for the existing ATCT to contain ACM, LBP, and PCBs ~~in the existing ATCT~~, which would be demolished following construction of a new ATCT. The Proposed Project would also disturb soils where PFAS may have been historically released and that could contain asbestos from prior abatement activities. The removal, handling, storage, transport, and treatment or disposal of hazardous materials are subject to federal, State, and local requirements related to hazardous waste. These requirements include: SJVAPCD requirements for demolitions and renovations; Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from CCR Title 8, Part 61, and CFR Subpart M (pertaining to asbestos).

Hazardous Materials Mitigation Measures, was revised to correct the title of Mitigation Measure HAZ-4 as follows:

> Mitigation Measure HAZ-4: ~~Abatement of Identified Hazardous Materials.~~ Removal, Handling, Storage, Transport, Treatment, and Disposal.

1.7.6.2 Section 3.14, Noise

Section 3.14.2.3, Regulatory Context, Regional and Local, City Municipal Code, bullet point 2, was revised to include a missing digit in "Section 10-105: Excessive Noise Prohibited:"

> **Section 10-105: Excessive Noise Prohibited.** No person shall make, cause, or suffer or permit to be made or caused upon any premises or upon any public street, alley, or place within the city, any sound or noise which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing or working in the area, unless such noise or sound is specifically authorized by or in accordance with this article. The provisions of this section shall apply to, but shall not be limited to, the control, use, and operation of the following noise sources:
>
> [Table 3-14 not duplicated here]
>
> (a) Radios, musical instruments, phonographs, television sets, or other machines or devices used for the amplification, production, or reproduction of sound or the human voice.
>
> (b) Animals or fowl creating, generating, or emitting any cry or behavioral sound.
>
> (c) Machinery or equipment, such as fans, pumps, air conditioning units, engines, turbines, compressors, generators, motors or similar devices, equipment, or apparatus.
>
> (d) Construction equipment or work, including the operation, use or employment of pile drivers, hammers, saws, drills, derricks, hoists, or similar construction equipment or tools.

1.7.7 Chapter 4, Alternatives

1.7.7.1 Section 4.3, Alternatives Screening

Section 4.3.1.3, Alternative 3: Site X1, Option B: Retain Existing ATCT for Another Use at FAT, was updated to correct a missing word:

> Option B would continue to meet criteria 1, 2, 3 and 5 for the same reasons as under Option A. However, Option B would not meet criterion 4 for the same reasons that Option A would not. Therefore, Alternative 3, Option B would not meet the objective of the Proposed Project and was eliminated from further consideration.

1.7.8 Chapter 5, Impact Overview

No revisions were made to Chapter 5.

1.7.9 Chapter 6, Public Outreach and Coordination

Chapter 6, Public Outreach and Coordination, paragraph 2 was revised to include mention of Appendix E:

> **Appendix A** contains the public and agency comments received on the NOP during the public scoping period. **Appendix E** contains the notice of availability documentation for

the release of the Draft EIR and the response to comments received during the public comment period.

1.7.9.1 Section 6.1.2, Draft Environmental Impact Report

Section 6.1.2, Draft Environmental Impact Report, was updated as follows:

Publication of ~~this~~ the Draft EIR ~~will begin~~ began a public review and comment period that ~~will~~ lasted for 45 days from September 10 to October 27, 2025, as required by Section 12105(a) of the CEQA guidelines. Upon publication, the Draft EIR ~~will be~~ was available to federal, State, and local agencies as well as to interested organizations and members of the public for review. Comments received during the Draft EIR public comments period ~~will be~~ are addressed and included in the Final EIR.

1.7.10 Chapter 7, References

No revisions were made to Chapter 7.

1.7.11 Chapter 8, List of Preparers

Chapter 8, List of Preparers, was updated to reflect persons directly involved in the preparation and review of the EIR.

1.7.12 Appendices

1.7.12.1 Appendix A, Notice of Preparation and Scoping Comments

No revisions were made to Appendix A.

1.7.12.2 Appendix B, Air Quality Detailed Emissions Inventory

No revisions were made to Appendix B.

1.7.12.3 Appendix C, Cultural and Tribal Resources

No revisions were made to Appendix C.

1.7.12.4 Appendix D, Phase I Environmental Site Assessment

No revisions were made to Appendix D.

1.7.12.5 Appendix E, Notice of Availability and Response to Comments

Appendix E, Notice of Availability and Response to Comments, is a new appendix.

1.7.12.6 Appendix F, Mitigation Monitoring and Report Program

Appendix F, Mitigation Monitoring and Report Program, is a new appendix.

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2 Project Description

2.1 Introduction

This chapter of the EIR presents a general description of the Proposed Project. It also describes the existing Airport, outlines the objectives of the Proposed Project, presents a detailed description of each component of the Proposed Project, and identifies the stages in which the Proposed Project would be implemented.

2.2 Project Location

The Airport is owned and operated by the City under the Airports Department within the City's administration. The Airport encompasses about 1,728 acres within the city of Fresno, approximately five miles northeast of downtown Fresno and adjacent to the city of Clovis. The Airport is accessed from the south via East Clinton Way. Major roadways near the Airport include State Route (SR) 168 to the west and SR 180 to the south. **Figure 2-1** shows the Airport location.

2.3 Existing Airport

The FAA's National Plan of Integrated Airports Systems (NPIAS) classifies the airport as a small hub primary[1] commercial service airport (Federal Aviation Administration, 2022). FAT primarily accommodates commercial passenger, cargo activities, general aviation, and military operations. There are two parallel runways at FAT: Runway 11L-29R, which is the primary runway for commercial, air cargo, and military operations, and Runway 11R-29L, which is more often used for general aviation (GA) traffic and provides operational redundancy when the primary runway is closed for maintenance. The runways are served by two parallel taxiways that flank the runways and multiple taxiways and taxilanes that provide access to and from the runways and aircraft parking positions.

The Airport has a terminal building with 12 main boarding gates, two ancillary gates, two aircraft parking stands for international arrivals, a ticketing lobby, baggage claim, concessions, a federal inspection station, a passenger security checkpoint area, Transportation Security Administration (TSA) baggage screening areas, and rental car facilities. FAT also has two fixed base operators (FBOs), an aircraft rescue and firefighting (ARFF) station, and an ATCT (see **Figure 2-2**).

2.3.1 Existing Airport Traffic Control Tower

The ATCT is owned and maintained by the City and is leased by the FAA. The ATCT is staffed and operated by FAA personnel, ensuring safe and efficient air traffic management within the Airport's airspace.

The ATCT is located on a 2.25-acre site northwest of the passenger terminal and adjacent to the ARFF station. The location of the ATCT is shown in **Figure 2-2**.

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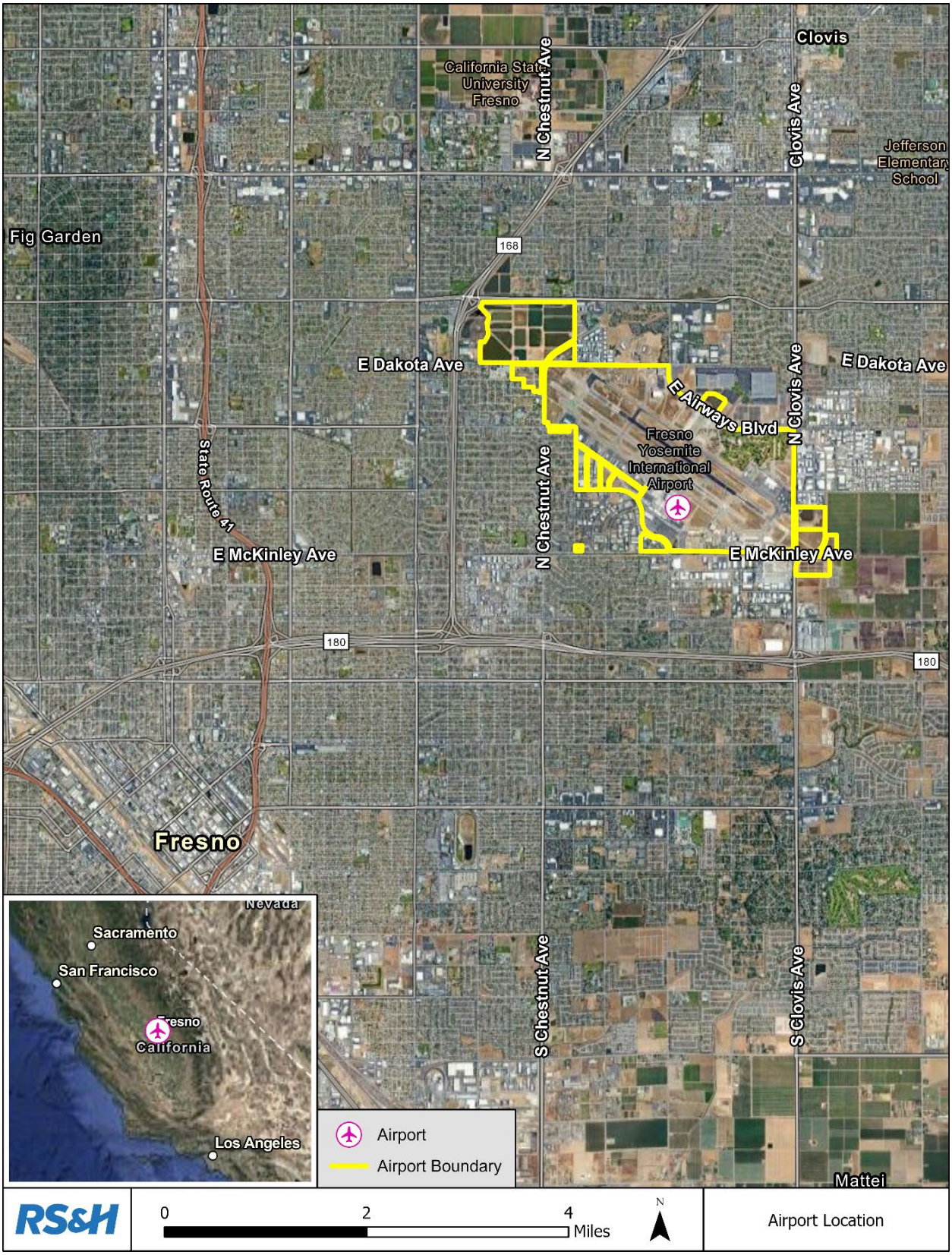
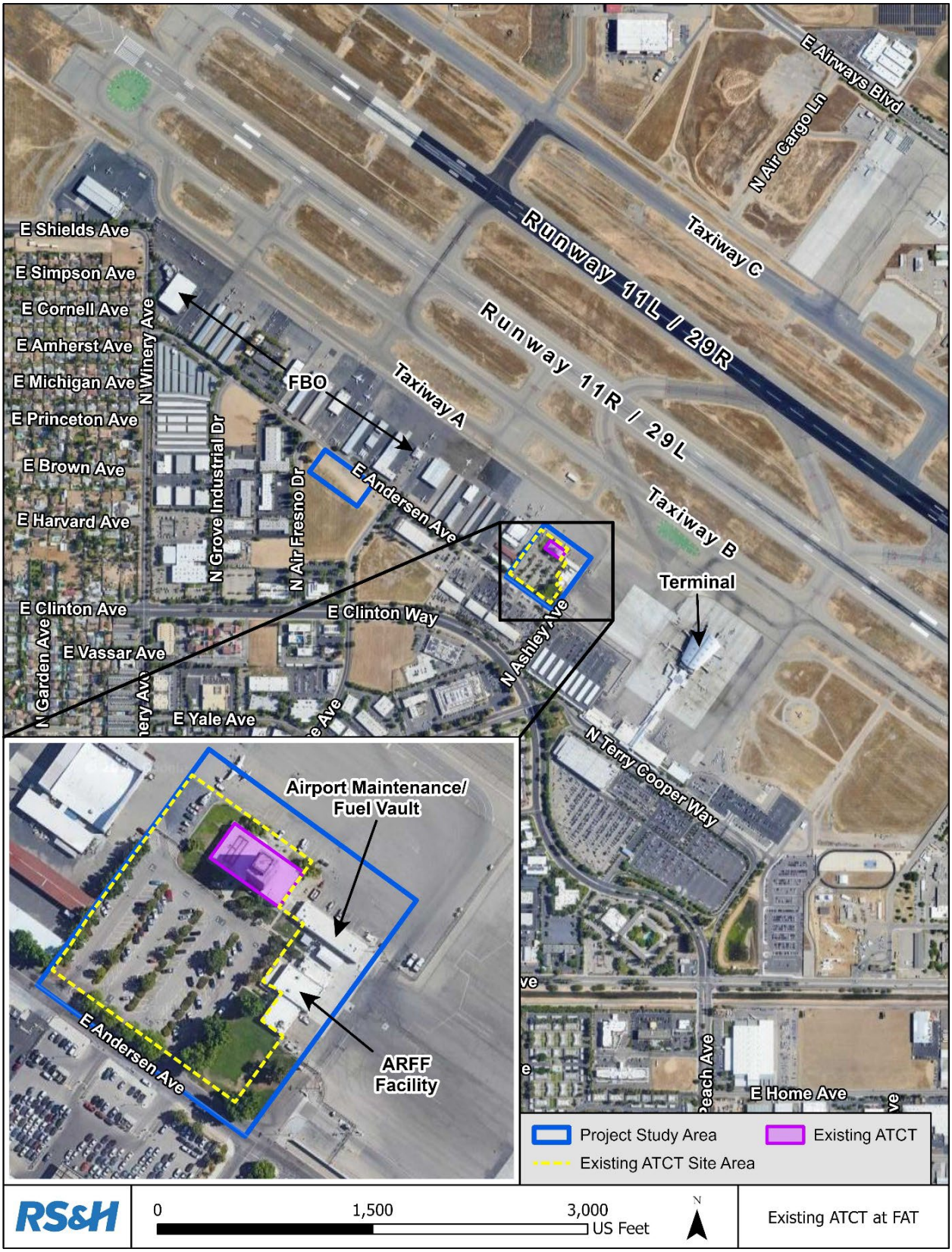
[1] A primary airport is defined by the Federal Aviation Administration as a commercial service airport that has more than 10,000 passenger boardings each year. See https://www.faa.gov/airports/planning_capacity/categories.

Figure 2-1: Airport Location



Source: RS&H, 2024

Figure 2-2: Existing Airport Traffic Control Tower at Fresno Yosemite International Airport



Source: RS&H, 2024

The ATCT was commissioned in 1961 and has not undergone any major renovations or remodels, only minor alterations. The ATCT facility includes the ATCT tower structure and a base building, which consists of administrative offices and storage spaces. The ATCT has a total of seven floors and is 80 feet in height from the ground to the floor of the control cab.[2] Including the control cab, the existing ATCT is approximately 94 feet in height with an eye height for controllers of about 82 feet. The airport rotating beacon is located on top of the control cab. A 48-stall unfenced parking lot dedicated for FAA personnel is located south of the ATCT facility. A view of the ATCT facility from the parking lot can be seen in **Figure 2-3**.

Figure 2-3: View of Existing Airport Traffic Control Tower Facility

The ATCT is continuously operated (24 hours a day, 7 days a week) by approximately 35 total FAA staff members. The ATCT facility houses both Air Traffic Control (ATC)[3] and Terminal

[2] The control cab is the portion of the facility located at the top of the functional shaft of the tower that houses ATC positions and provides the line of sight to the airport operations area (AOA).

[3] Air Traffic Controllers (ATC) at an ATCT provide air traffic services for phases of flight associated with aircraft takeoff and landing. The ATCT typically controls airspace extending from the airport out to a distance of several miles.

Radar Approach Control (TRACON)[4] operations in the same building. ATC has five operational positions in the ATCT and TRACON has six. Most ATC operators at FAT are trained in both ATC and TRACON, which makes it a prominent training facility for controllers beginning their careers. The ATCT facility also houses the FAA Technical Operations (Tech Ops) division in charge of the maintenance of aviation safety equipment at the Airport. The location of Tech Ops within the ATCT facility allows for a prompt maintenance response to equipment malfunctions to enable continuous safe operation of aircraft arriving to and departing from FAT. The existing Tech Ops division includes 12 stations or positions for up to 12 employees.

According to the U.S. Department of Transportation (U.S. DOT), the average useful life of an ATCT facility is approximately 25 to 30 years (U.S. DOT, 2008). Despite its continued service, parts of the ATCT facility, including the elevator and HVAC system, no longer function as intended and/or no longer meet current building code requirements. These issues pose several safety deficiencies and challenges to the Airport's ongoing maintenance efforts to keep the ATCT operational and safe for air traffic control purposes.

2.3.2 Airport Operations

Aircraft operations at the Airport include commercial, military, emergency services, corporate and business, and GA. The majority of military operations out of FAT are the California Air National Guard's 144th Fighter Wing and the California Army National Guard's 1106th Theater Aviation Sustainment Maintenance Group, both of which are based out of FAT. Emergency services operations include medical transport and wildland firefighting. GA operators and service providers at FAT include two FBOs (Signature Flight Services and Atlantic Aviation) that cater to personal, corporate, charter, and occasionally transient military aircraft; aircraft sales and maintenance; and flight training. FAT is also the closest commercial service airport to Yosemite, Kings Canyon, and Sequoia National Parks.

2.4 Forecasts

Table 2-1 shows the Airport's operations, passenger enplanements, and based aircraft[5] at the Airport from 2018 through 2023, as reported in the FAA's Terminal Area Forecast (TAF) issued by the FAA in January 2025. As the total operations and passenger enplanements presented in **Table 2-1** show, the COVID-19 pandemic resulted in a sharp drop in passenger enplanements in 2020. However, by the following year, FAT already recovered to pre-pandemic operations and passenger enplanement totals. By 2022, total passenger enplanements nearly doubled from 2020. In 2023, passenger enplanements continued to grow to 1,150,840. Based aircraft at the Airport increased by eight between 2018 and 2019 and has remained at 187 since 2019.

Table 2-2 summarizes the Airport's forecast operations, passenger enplanements, and based aircraft at the Airport for 2024 through 2034.

---

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

5 Based aircraft are GA aircraft that use a specific airport as a home base.

Table 2-1: Fresno Yosemite International Airport Operations and Enplanements

Year	Operations	Passenger Enplanements	Based Aircraft
2018	81,670	830,004	179
2019	92,038	933,309	187
2020	73,141	589,949	187
2021	83,419	830,413	187
2022	85,682	1,082,129	187
2023	89,711	1,150,840	187

Source: Terminal Area Forecast (Federal Aviation Administration, 2025a)

Table 2-2: Fresno Yosemite International Airport Forecast

Year	Operations	Passenger Enplanements	Based Aircraft
2024	89,184	1,286,647	187
2025	92,506	1,405,071	187
2026	94,958	1,440,431	187
2027	96,795	1,475,079	187
2028	98,078	1,510,661	187
2029	98,879	1,545,443	187
2030	99,680	1,580,295	187
2031	100,474	1,614,973	187
2032	101,269	1,649,817	187
2033	102,072	1,685,161	187
2034	102,881	1,720,874	187

Source: Terminal Area Forecast (Federal Aviation Administration, 2025a)

2.5 Project Objective

In compliance with Section 15124(b) of the CEQA Guidelines, the City is required to identify its objective(s) associated with the Proposed Project. The City has identified the following objective to be achieved through the implementation of the Proposed Project.

> Provide an ATCT facility that meets current FAA, State, and local building standards and improves safety and operations at the Airport for ATCT operators and Airport users.

The project objective is consistent with the following objective and policy of the Mobility and Transportation Element of *The City of Fresno General Plan* (General Plan) (City of Fresno, 2014a):

- **Objective M-12:** Operate the City's municipal airport facilities to meet present and anticipated demands in a manner that maintains compliance with federal regulations, enhances safety to the public, minimizes the adverse effects of aircraft operations on people, and promotes the economic health of the community.

- **Policy M-12-a: Funding for Airport Capital Improvements.** Pursue appropriate funding sources and capital improvement budget enhancements that will:
    - Provide a modern, safe, and efficient municipal airport terminal facility including the Federal Inspection Station and airfield;
    - Maintain airfield compliance with FAA Part 139 operating requirements;
    - Maintain financial self-sufficiency and long-term sustainability; and
    - Continue to implement the master plans for FYI Airport and Fresno Chandler Executive Airport to meet projected air passenger travel, air cargo transportation and general aviation demands.

The following provides a detailed description of how the City proposes to meet the objective of the Proposed Project.

1. **Provide an ATCT facility that meets current FAA, State, and local building standards**: The existing ATCT does not meet current FAA space and height requirements as detailed in FAA Order 6480.7E, *Airport Traffic Control Tower (ATCT) and Terminal Radar Approach Control (TRACON) Design Policy,* and FAA Order 6480.4B, *Airport Traffic Control Tower Siting Criteria*. Additionally, the existing ATCT does not meet current State and local building requirements, including seismic requirements as specified in the California Code of Regulations, Title 24, California Building Code, Section 2, Volume 2, Chapter 16, *Structural Design* and Section 1613, *Earthquake Loads*; and the latest State fire protection requirements as identified in 2022 California Fire Code, Title 24, Part 9. Further, the existing ATCT does not meet current Americans with Disability Act (ADA) requirements. The new ATCT facility would be constructed according to current FAA, State, and local building standards.
2. **Provide an ATCT facility that is of adequate height and has an unobstructed line of sight**: The existing ATCT, at 80 feet in height from the ground to the cab floor, is too low, which poses an obstructed line of sight. As a result of FAT's terminal building expansion project in 2000, the existing ATCT's southeastward line of sight is partially obstructed due to the increased height of the passenger terminal. The inability for ATC operators to have direct line of sight of the aircraft apron located immediately east of the terminal creates potential risks, including aircraft incursions,[6] and delayed ATC pilot instructions. Additionally, FAT experiences wrong surface landings on Runways 29R and 29L due to closely spaced runways, parallel taxiways, and Runway 29L being displaced 312 feet to provide the FAA-required separation from Clovis Avenue. ATCs are the last line of control prior to pilots landing on the wrong runway; however, the angle and height of the existing ATCT cause a parallax[7] issue for ATCs looking at Runways 29R and 29L that does not allow them to determine if a pilot is lined up to land on the correct runway. The new ATCT facility would be of adequate height to meet FAA line-of sight

[6] Any occurrence at an airport involving the incorrect presence of an aircraft, vehicle, or person on the protected area of a surface designated for the landing and takeoff of aircraft.

[7] The definition of "parallax" on the Merriam-Webster Dictionary is, "the apparent shift in position of an object as seen from two different points not on a straight line with the object."

requirements and demolition of the existing ATCT would remove all obstructions from the line of sight of the new ATCT.

3. **Provide an ATCT facility that allows for operational efficiency**: As a result of the partial obstruction of the aircraft apron immediately east of the terminal, communication with aircraft on that apron can be impeded. Due to the delay in communication with the ATCT, aircraft dwell times operating on this apron have increased. The new ATCT facility is proposed at a location and height that, with the demolition of the existing ATCT, would remove the partial obstruction of the aircraft apron immediately east of the terminal.
4. **Provide an ATCT facility that does not result in high costs of repairs and disruptions to facility operations due to frequent repairs and emergency maintenance**: The existing ATCT facility has reached a point where its maintenance costs are increasing significantly and the City estimates that the ATCT is in need of $10 million in improvements and upgrades (City of Fresno, 2019a). Aging infrastructure, equipment, and systems require frequent repairs and updates. For example, the elevator in the building frequently breaks down, requiring custom-order parts that can have long lead times and high costs due to parts being discontinued. Additionally, the frequent breakdown of the elevator causes accessibility issues for the employees and affects staffing levels when employees cannot access the cab at the top of the ATCT. Other mechanical and electrical systems, such as the HVAC and boiler system, have exceeded their service life and require constant maintenance to remain in service. This results in disruptions to facility operations and additional high costs for emergency repairs. The new ATCT facility would provide an updated facility and equipment that would be reliable and reduce maintenance costs.
5. **Provide an ATCT facility that is secure from unauthorized access**: The parking area around the existing ATCT facility is not adequately secured. This poses a security risk, as ATC operators have reported a breach into the existing ATCT within the last decade and numerous other attempts. Unauthorized individuals could gain access to the existing ATCT and compromise the safety of the airspace and FAA personnel within the facility. The new ATCT facility would include security fencing with gate-controlled access to enclose the ATCT facility and adjacent employee parking lot. FAA Advisory Circular (AC) 150/5300-13B, Airport Design, states, "Part 139[8] airports must provide safeguards that prevent unauthorized person entry to the movement area. This includes installation of fencing, provision of access controls, and conformance to the Transportation Security Administration's approved airport security program." Additionally, FAA Order 1600.69D, *FAA Facility Security Management Program*, identifies the required security countermeasures that must be in place at FAA facilities. At an ATCT, pedestrian access to the site must be deterred through the use of landscaping, fencing, and other barriers to restrict pedestrian access. FAA Order 1600.69D also requires that countermeasures

[8] 14 CFR Part 139 requires FAA to issue airport operating certificates to airports that: serve scheduled and unscheduled air carrier aircraft with more than 30 seats; serve scheduled air carrier operations in aircraft with more than 9 seats but less than 31 seats; and the FAA Administrator requires to have a certificate. FAT operates under a Part 139 certificate.

are in place, such as access-controlled parking, to prohibit unauthorized vehicle access to the site.

2.6 Proposed Project

The Proposed Project is the replacement and relocation of the existing ATCT facility and associated infrastructure at the Airport.

The Proposed Project includes the following components, which are illustrated in **Figure 2-4**:

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

2.6.1 Construct New ATCT Facility and Demolish Existing ATCT Facility

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

The new ATCT facility would meet the design policy described in FAA Job Order 6480.7E, *ATCT and TRACON Design Policy*. The base building would include administrative offices and operational and storage spaces**.** [9] The cab would be approximately 440 sq ft in size and be able to accommodate four controller positions plus a supervisor. The floor of the cab would be 150 feet tall; the cab would be about 17 feet tall with up to 23 feet of additional height from antennas extending above the cab for a total ATCT height of up to 190 feet.

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

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

2.6.2 Install New Equipment and Utility Services

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

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[9] Operational space is for ATCs to provide air traffic service to aircraft as they transition between an airport and the en route phase of flight, and from the en route phase of flight to an airport. This includes the departure, climb, descent, and approach phases of flights.

Figure 2-4: Proposed Project

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

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

2.6.3 Reconstruct Employee Parking Lot and Install Security Fencing

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

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

2.7 Staging of the Proposed Project

The Proposed Project would be implemented in four stages between 2027 and 2028 (**Table 2-3)**. The stages are general in nature and could be modified once approval for the Proposed Project is provided and detailed design of project components occurs.

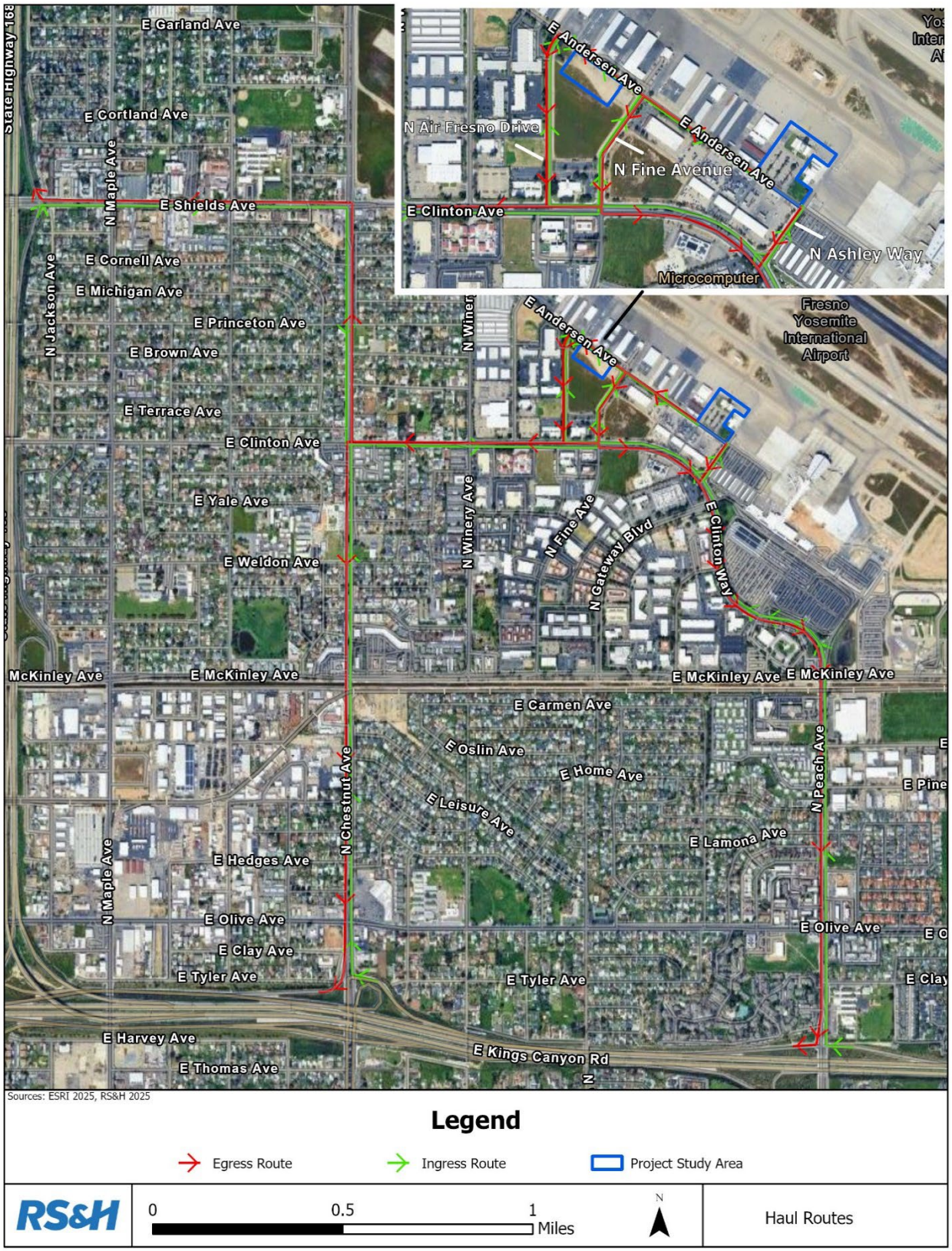
Identified haul routes are shown in **Figure 2-5**.

Table 2-3: Anticipated Construction Schedule of the Proposed Project

Stage	Activities	Timeframe
Stage 1 - ATCT Facility Site Preparation		2027
	Grading and drainage	4 weeks
	Trenching and utility extensions	2 weeks
Stage 2 - ATCT Facility Construction		2027-2028
	ATCT construction	30 weeks
	Base building construction	30 weeks
	Architectural coating	4 weeks
Stage 3 - Existing ATCT Facility Demolition		2028
	ATCT and base building demolition	6 weeks
Stage 4 - Parking Lot Reconstruction		2028
	Grading and drainage	3 weeks
	Paving	3 weeks

Source: RS&H, 2024; Pond & Company, 2024.

Figure 2-5: Proposed Haul Routes



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3 Existing Conditions, Environmental Impacts, and Mitigation Measures

3.1 Introduction

This chapter presents the existing conditions, environmental impacts, and mitigation measures for each of the following environmental resource categories:

- Aesthetics
- Agriculture / Forest Resources
- Air Quality
- Biological Resources
- Cultural and Tribal Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

Each section provides the background and methodology (including the regulatory context, and significance thresholds for the environmental resource), a description of the existing conditions for that environmental resource at the Airport or in the Airport vicinity, a discussion of the environmental impacts that could occur as a result of implementation of the Proposed Project, a determination of whether the impact is considered to be significant, and any mitigation measures that would reduce the magnitude of an identified significant impact. Each impact and subsequent mitigation measure, if applicable, is identified separately.

A project study area was developed for use in this EIR (see **Figure 3-1**) for analysis of impacts. All project components are located within the study area**.** The project study area is the footprint of the Proposed Project and the boundary within which all components and staging areas would be located and, therefore, where there is potential for direct effects to occur. The project study area also includes two buildings, an Airport maintenance building and the Airport's ARFF facility, adjacent to the existing ATCT that would not be affected by the Proposed Project, but were included in the Cultural Resources Assessment.

Unless otherwise stated, this project study area was used in the analyses throughout **Chapter 3**.

Figure 3-1: Project Study Area

Source: RS&H, 2024.

3.2 Aesthetics

This section describes the existing aesthetic resources and an analysis of potential impacts and proposed mitigation measures for the Proposed Project at FAT.

3.2.1 Regulatory Setting

3.2.1.1 Federal

No federal laws, policies, or regulations related to aesthetics are applicable to the Proposed Project.

3.2.1.2 State

California Environmental Quality Act (CEQA)

CEQA establishes that it is the policy of the State to take all action necessary to provide the people of this state with "…enjoyment of aesthetic, natural, scenic, and historic environmental qualities" (CA Public Resources Code [PRC] 21001[b]).

California Scenic Highway Program

The California Scenic Highway Program protects and enhances the natural scenic beauty of California highways and adjacent corridors through its designation of scenic highways throughout California (Caltrans, 2024). The California Department of Transportation (Caltrans) considers the following elements into their determination of a scenic highways: how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view.

California Energy Code (California Building Energy Efficiency Standards)

The California Energy Code was first established in 1978 and incorporated into the California Building Energy Efficiency Standards under California Code of Regulations (CCR) Title 24, Part 6. The California Building Energy Efficiency Standards are updated every three years and were established to reduce wasteful, uneconomical, and unnecessary energy use throughout the state. The energy efficiency standards set by the code apply to new construction and rehabilitation projects of residential and non-residential buildings and are enforced through the local building permitting process.

The California Energy Code outlines energy-efficient standards to regulate lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn off and on lights, for new developments in both the private and public sectors (California Energy Commission, 2024a). The 2025 Building Efficiency Standards were adopted in September 2024 and will go into effect January 1, 2026, for all newly constructed buildings, additions, and alterations.

3.2.1.3 Regional and Local

City of Fresno General Plan

The City of Fresno General Plan includes objectives and policies related to aesthetic resources within the city of Fresno (City of Fresno, 2014a). The General Plan designates land uses within and in the vicinity of the study area as airport, general commercial, and light industrial. The

General Plan's Urban Form, Land Use, and Design Element contains the following objectives and policies related to land use that are relevant to the Proposed Project:

- **Policy D-1-j, Lighting Standards.** Update lighting standards to reflect best practices and protect adjoining uses from glare and spillover light.
- **Policy D-4-c Appropriate Day and Night Activity.** Promote new residential, commercial and related forms of development that foster both day and appropriate night time activity; visual presence on the street level; appropriate lighting; and minimally obstructed view areas.

City of Fresno Municipal Code

Chapter 15 of the City of Fresno's Municipal Code contains regulations that address the aesthetic considerations of citywide developments (City of Fresno, 2019b). Airport facilities are identified as exempt from outdoor lighting and illumination standards. The following lighting and glare performance standards in Chapter 15, Article 25 are relevant to the Proposed Project:

- **Section 15-2508: Lighting and Glare, Provision B, Lighting.** Lights shall be placed to deflect light away from adjacent properties and public streets, and to prevent adverse interference with the normal operation or enjoyment of surrounding properties. Direct or sky-reflected glare from floodlights shall not be directed into any other property or street. Except for public street lights and stadium lights, no light, combination of lights, or activity shall cast light onto a residentially zoned property, or any property containing residential uses, exceeding one-half foot-candle.
- **Section 15-2508: Lighting and Glare, Provision C, Glare:**
    1. No use shall be operated such that significant, direct glare, incidental to the operation of the use is visible beyond the boundaries of the lot where the use is located.
    2. Windows shall not cause glare that may disrupt adjoining properties, traffic on adjacent streets, etc.
    3. Glare or heat reflected from building materials shall be mitigated so as to not disrupt surrounding properties.
- **Section 15-2509: Shadow Casting:** When a structure will exceed 50 feet in height, the developer must submit an analysis of the shadows that the structure will cast on planned or existing residential property.
    1. The shadow analysis should demonstrate the maximum extent of the shadows cast by a building through at least the four quarters of the year, between one hour after sunrise and one hour before sunset.
    2. If the analysis indicates that the project shadow does not reach or significantly impact any residential properties, no further review of the project shadow will be required. However, if there is indication that the shadow would significantly impact residential properties, alternative designs or other mitigation measures shall be presented.

Other

The Airport is not located in a Dark Sky Place as designated by the International Dark Sky Association (DarkSky International, 2024).

3.2.2 Significance Thresholds

Significant impacts related to aesthetics would occur if implementation of the Proposed Project would result in any of the following:

a) Have a substantial adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.2.3 Methodology

Impacts on visual character were determined by comparing existing visual conditions at and around FAT with conditions under the Proposed Project. The study area for the aesthetics analysis comprises the FAT property and areas surrounding FAT that would have views of the Proposed Project. Existing visual conditions were documented through photos of the site, Google Earth images, and site visits.

The methodology used to assess visual character impacts included how the Proposed Project would change any views of and near the project study area. To determine if the Proposed Project would create a new source of substantial light or glare, the analysis considered light spillover effects, or light that shines beyond the area intended for illumination that can be a source of annoyance to adjoining properties, particularly for residences where light might disturb sleep or privacy. Glare from both daytime reflection of sunlight off large expanses of reflective surface and unshielded nighttime lighting can also have adverse effects on land use, including airport operations. Therefore, this section addresses the potential for the Proposed Project to: (1) introduce new light sources that could adversely affect nearby light-sensitive receptors (e.g., residential uses, hotels, and natural areas); and (2) introduce new light or glare sources that could adversely affect day or nighttime views in this area.

3.2.4 Existing Conditions / Environmental Setting

The Airport totals approximately 1,728 acres within the City of Fresno. The General Plan designates land uses in the vicinity of the Airport light industrial, general commercial, and airport (City of Fresno, 2024a). The study area encompasses a total of 5.98 acres and includes the existing ATCT, the adjacent employee parking lot, the airfield apron directly adjacent to the

existing ATCT, an Airport maintenance building, the ARFF facility, a landscaped area south of the ARFF facility, and a portion (1.78 acres) of a vacant lot approximately 0.23 mile southwest of the existing ATCT off East Andersen Avenue for use as a construction staging area.

The project study area is located in an urbanized area subject to preexisting exterior lighting from surrounding Airport development, other commercial and industrial development, and street lighting. There are several existing sources of light and glare within the study area, including streetlights along streets and within the parking lot, and lighting from the interior and exterior of the existing ATCT. The existing ATCT contains glass and metal exterior or materials which contribute to localized sources of glare. In addition, the parked cars within the parking lot within the project study area are a source of glare when sunlight reflects off the windows.

3.2.5 Environmental Impacts and Mitigation

3.2.5.1 Have a substantial adverse effect on a scenic vista

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. The City's approved General Plan (City of Fresno, 2014a) identifies six locations along the San Joaquin River bluffs as designated vista points from which views should be maintained. The Proposed Project is located on Airport property and adjacent to the existing ATCT. The Proposed Project is not located within any of the scenic vista points identified in the General Plan. The nearest scenic vista is by Spano Park, approximately 7.2 miles northwest of the project study area. Additionally, the construction of the Proposed Project would not significantly affect or block a potentially scenic vista in the city. Therefore, the Proposed Project would not have a substantial adverse effect on a scenic vista and there would be ***no impact***.

3.2.5.2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway

According to the Caltrans State Scenic Highway Mapping System (Caltrans, 2023), the nearest eligible portion of State Route (SR) 168 is approximately 2.3 miles northwest of the project study area. The nearest officially designated State Scenic Highway is SR 180 at South Frankwood Avenue, which is located approximately 16.3 miles southeast of the project study area. Because of the distance to the nearest eligible or officially designated State Scenic Highways from the project study area, the Proposed Project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a designated State scenic highway. There would be ***no impact***.

3.2.5.3 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality

The Proposed Project is located on Airport property and would include the construction of a new ATCT and the demolition of the existing ATCT. Although the Proposed Project would change the visual characteristics of the project study area through the relocation of the ATCT, the design of the Proposed Project would be consistent and compatible with the visual character of the Airport and the Proposed Project would not substantially degrade the visual character or quality of the site and its surroundings, nor would the Proposed Project conflict with applicable zoning and other regulations governing scenic quality. There would be ***no impact***.

3.2.5.4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

Short-term construction impacts would introduce temporary sources of light and glare from machinery and construction traffic. Additionally, nighttime construction, if necessary, would also introduce new sources of temporary light. However, construction activities would occur primarily during daylight hours and would be temporary, only for the duration of construction. Additionally, construction lighting would be unlikely to be visible from the nearest residence, located 0.5 miles west, due to the distance and the regular operational and security lighting at the Airport.

The Proposed Project would construct a new ATCT facility about 250 feet south of the existing ATCT and then demolish the existing ATCT. Lighting included with the new ATCT facility, including adjacent parking lot, would be consistent with the lighting of the existing ATCT and parking lot. The Proposed Project would be required to comply with California Building Code (CCR Title 24) standards and the City's relevant lighting and glare performance standards identified in **Section 3.2.1.3**. Therefore, the Proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area and the impact would be ***less than significant***.

3.3 Agriculture / Forest Resources

This section describes the existing setting related to agriculture and forest resources based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.3.1 Regulatory Setting

3.3.1.1 Federal

Farmland Protection Policy Act

The Natural Resources Conservation Service, a federal agency within the U.S. Department of Agriculture (USDA), oversees the implementation of the Farmland Protection Policy Act (FPPA). The purpose of the FPPA is to reduce the negative effects that federal programs may have on the unwarranted and permanent conversion of farmland into nonagricultural uses. Under FPPA guidelines, "farmland" encompasses prime farmland, unique farmland, and land considered significant at the state or local level. It isn't limited to actively cultivated cropland, it may also include pastureland, forested areas, or other types of rural land, excluding bodies of water and developed urban areas.

3.3.1.2 State

California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, provides financial incentives, through reduced property taxes, to deter the conversion of farmland and open space preserves to other land uses. The act enables local governments to enter into contracts with private landowners to ensure that specific parcels are kept in agricultural or open space use as "agricultural preserves."

California Farmland Conservancy Program

In 1996, the California Farmland Conservancy Program was established to encourage the permanent conservation of productive agricultural lands in collaboration with local entities. In creating this program, the Legislature recognized the important contribution that farmland makes to the state's food supply as well as the additional benefits that farmland provides (i.e., conserving wildlife habitat, protecting wetlands, and preserving scenic open space).

Forest Land and Timberland

The California Timberland Productivity Act of 1982 defines "timberland" as "privately owned land, or land acquired for state forest purposes, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, and which is capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre".

3.3.1.3 Regional and Local

City of Fresno General Plan

The City of Fresno General Plan includes the following policy relating to agricultural and forest lands:

- **Policy RC-9-c, Farmland Preservation Program.** In coordination with regional partners or independently, establish a Farmland Preservation Program. When Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is converted to urban uses outside City limits, this program would require that the developer of such a project mitigate the loss of such farmland consistent with the requirements of CEQA. The Farmland Preservation Program shall provide several mitigation options that may include, but are not limited to the following: Restrictive Covenants or Deeds, In Lieu Fees, Mitigation Banks, Fee Title Acquisition, Conservation Easements, Land Use Regulations, or any other mitigation method that is in compliance with the requirements of CEQA. The Farmland Preservation Program may be modeled after some of all of the programs described by the California Council of Land Trusts.

City of Fresno Zoning Ordinance

Chapter 15 of the City's Municipal Code provides guidance for physical development within the city with the goal of meeting the land use, including agricultural and forestry uses, identified in the approved General Plan.

3.3.2 Significance Thresholds

Significant impacts related to agriculture and forest resources would occur if implementation of the Proposed Project would result in any of the following:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monito-ring Program of the California Resources Agency, to non-agricultural use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

d) Result in the loss of forest land or conversion of forest land to non-forest use.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

3.3.3 Methodology

To identify potential agricultural or forest resources in or near the project study area, the Farmland Mapping and Monitoring Program (FMMP) was reviewed to determine whether the proposed project site contains or consists of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as determined by the FMMP maps. The City General Plan land use designations and zoning that include the project study area were evaluated to identify existing designations and determine the existence of any conflicts between the Proposed Project and any potential existing agricultural General Plan and zoning designations applicable to the project study area.

3.3.4 Existing Conditions / Environmental Setting

The Proposed Project is located within an urbanized area of the city of Fresno. The project study area is designated as "airport" land use in the City General Plan and is located within Industrial and Public and Semi-Public zoning districts which allows for airport uses (City of Fresno, 2019b). There are no agricultural uses located within or adjacent to the project study area. Additionally, the site is classified by the California Department of Conservation FMMP as "Urban and Built Up" (California Department of Conservation, 2022).

3.3.5 Environmental Impacts and Mitigation

3.3.5.1 Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

There are no agricultural uses located within or adjacent to the project study area. Additionally, the site is classified by the California Department of Conservation FMMP as "Urban and Built Up" (California Department of Conservation, 2022). Therefore, development of the Proposed Project would not convert agricultural land to a non-agricultural use. The Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to a non-agricultural use and there would be no impact and there would be ***no impact***.

3.3.5.2 Conflict with existing zoning for agricultural use, or a Williamson Act contract.

The project study area is not subject to a Williamson Act contract. Therefore, development of the Proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and the Proposed Project would have ***no impact***.

3.3.5.3 Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

The project study area is located within an existing urban area and is located within Industrial and Public and Semi-Public zoning districts in the city of Fresno. The Proposed Project would not conflict with the existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Therefore, the Proposed Project would have ***no impact***.

3.3.5.4 Result in the loss of forest land or conversion of forest land to non-forest use.

There are no forest lands within or near the project study area. The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the Proposed Project would have ***no impact***.

3.3.5.5 Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The project study area is located within an existing urban environment and would not involve other changes in the existing environment, which, due to their location or nature, could result in

conversion of farmland to non-agricultural uses or conversion of forest land to non-forest use. Therefore, the Proposed Project would have ***no impact***.

3.4 Air Quality

This section analyzes existing and future air pollutant emissions and proposed mitigation measures to address potential project-related air quality impacts from the Proposed Project. The EIR documents potential construction and operational pollutant emissions resulting from implementation of the Proposed Project.

3.4.1 Regulatory Setting

3.4.1.1 Federal

Federal Clean Air Act

The Clean Air Act of 1963 (CAA) was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the U.S. Environmental Protection Agency (USEPA) is responsible for implementing certain portions of the CAA including mobile source requirements. Other portions of the CAA, such as stationary source requirements, are implemented by state and local agencies.

The CAA establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The USEPA currently regulates six criteria pollutants: ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM), and lead (Pb). Particulate matter is divided into two particle size categories: coarse particles with a diameter less than 10 micrometers (PM_{10}) and fine particles with a diameter of less than 2.5 micrometers ($PM_{2.5}$). The NAAQS are expressed in terms of pollutant concentration measured (or averaged) over a defined period of time and are two-tiered. The first tier (the “primary standard”) is intended to protect public health; the second tier (the “secondary standard”) is intended to protect public welfare and prevent further degradation of the environment.

If the air quality in a geographic area is equal to or better than the national standard, the USEPA will typically designate the region as an “attainment area.” An area where air quality does not meet the national standard is typically designated by the EPA as a “non-attainment area.” Once the air quality in a non-attainment area improves to the point where it meets the standards and the additional requirements outlined in the CAA, the USEPA can re-designate the area to attainment upon approval of a Maintenance Plan, and these areas are then referred to as “maintenance areas.” Each state is required to prepare a State Implementation Plan (SIP) that outlines measures that regions within the state will implement to attain the applicable air quality standard in non-attainment areas for applicable criteria air pollutants, and to maintain compliance with the applicable air quality standard in maintenance areas. The status and severity of pollutant concentrations in a particular area affect the types of measures a state must take to reach attainment with the NAAQS. The USEPA must review and approve each state’s SIP to ensure the proposed measures are sufficient to either attain or maintain compliance with the NAAQS within a set period of time.

The Clean Air Act Amendments of 1990 (CAAA) require states to make recommendations to the USEPA regarding the attainment status of all areas within their borders when the USEPA finalizes an update to any NAAQS. Under its CAAA authority, the USEPA further classifies non-

attainment areas for some pollutants – such as O_3 – based on the severity of the NAAQS violation as marginal, moderate, serious, severe, and extreme. To further improve the nation's air quality, the USEPA lowered the O_3 standard in 2015 to 0.070 parts per million (ppm). The area surrounding the Airport meets all ambient air quality standards with the exception of ground-level O_3, CO, and $PM_{2.5}$ (U.S. Environmental Protection Agency, 2024). **Table 3-1** presents the federal and State ambient air quality standards.

Table 3-1: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards/1/	National Standards/2/	
		Concentration	Primary/3/	Secondary
Ozone (O_3)	8 Hour	0.07 ppm	0.075 ppm	Same as Primary Standard
	1 Hour	0.09 ppm	—	—
Carbon Monoxide (CO)	8 Hour	9.0 ppm	9 ppm	—
	1 Hour	20 ppm	35 ppm	—
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm	0.100 ppm/6/	—
	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Same as Primary Standard
Sulfur Dioxide (SO_2)/7/	1 Hour	0.25 ppm	0.075 ppm	—
	3 Hour	—	—	0.5 ppm
	24 Hour	0.04 ppm	0.14 ppm	—
	Annual Arithmetic Mean	—	0.030 ppm	—
Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	—	—
	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary Standard
Particulate Matter – Fine ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3 /9/	15 µg/m^3
	24 Hour	—	35 µg/m^3 /10/	Same as Primary Standard
Lead (Pb)/8/	30-day Average	1.5 µg/m^3	—	—
	Calendar Quarter	—	1.5 µg/m^3	—

Pollutant	Averaging Time	California Standards[1]	National Standards[2]	
		Concentration	Primary[3]	Secondary
	Rolling 3 Month Average	—	0.15 µg/m^3	Same as Primary Standard
Sulfates	24 Hour	25 µg/m^3	**No National Standards**	
Hydrogen Sulfide	1 Hour	0.03 ppm	**No National Standards**	
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm	**No National Standards**	
Visibility Reducing particles	8 Hour	See Note #5	**No National Standards**	

A=Attainment N=Nonattainment U=Unclassified

NOTES:

1. California standards for Ozone (O_3), carbon monoxide (CO) (except Lake Tahoe), sulfur dioxide (SO_2) (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter (PM) – PM_{10}, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe CO, lead, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e., all standards except for lead and the PM_{10} annual standard), then some measurements may be excluded, e.g., measurements are excluded that the California Air Resources Board (CARB) determines would occur less than once per year on the average.

2. National standards shown are the "primary standards" designed to protect public health. National standards other than for O_3, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O_3 standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O_3 standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM_{10} standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than 150 µg/m^3. The 24-hour $PM_{2.5}$ standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m^3.

Except for the national particulate standards, annual standards are met if the annual average falls below the standard at every site. The national annual particulate standard for PM_{10} is met if the 3-year average falls below the standard at every site. The annual $PM_{2.5}$ standard is met if the 3-year average of annual averages spatially averaged across officially designed clusters of sites falls below the standard.

3. National air quality standards are set by USEPA at levels determined to be protective of public health with an adequate margin of safety.

4. On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O_3 concentration per year, averaged over three years, is equal to or less than 0.070 ppm. USEPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O_3 level in the area.

5. Statewide VRP Standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

6. To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100ppm (effective January 22, 2010).

7. On June 2, 2010, the USEPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO_2 NAAQS however must continue to be used until one year following USEPA initial designations of the new 1-hour SO_2 NAAQS. USEPA expects to make designation for the Bay Area by the end of 2017.

8. CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined.

9. In December 2012, USEPA strengthened the annual $PM_{2.5}$ NAAQS from 15.0 to 12.0 micrograms per cubic meter ($\mu g/m^3$). In December 2014, USEPA issued final area designations for the 2012 primary annual $PM_{2.5}$ NAAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.

Source: (San Joaquin Valley Air Pollution Control District, 2024a); (U.S. Environmental Protection Agency, 2024)

3.4.1.2 State

California Air Resources Board

The California Air Resources Board (CARB) manages air quality, regulates mobile emission sources, and oversees the activities of regional Air Quality Management Districts and county Air Pollution Control Districts. CARB also establishes California state standards for vehicle emissions, and the California Ambient Air Quality Standards (CAAQS) (see **Table 3-1)**. CARB has granted authority to the regional air quality management districts and county air pollution control districts to develop stationary source emissions standards, issue air quality permits, and enforce permit conditions.

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practicable date. The CAAQS are at least as stringent as, and in several cases more stringent than the NAAQS.

3.4.1.3 Regional and Local

San Joaquin Valley Air Pollution Control District

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the primary agency responsible for ensuring that the NAAQS and CAAQS are attained and maintained in the San Joaquin Valley Air Basin (SJVAB), which includes the following: all of San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, and Tulare counties and a portion of Kern County. SJVAPCD is responsible for developing and implementing air control measures within its area to attain and maintain air quality standards set by USEPA and CARB. In addition, they also issue permits for stationary sources of air pollutants, inspect stationary sources and respond to citizen complaints, monitor air quality and meteorological conditions, award grants to reduce mobile emissions, conduct public outreach campaigns, and assist local governments in establishing climate friendly practices.

The SJVAB is currently in nonattainment for O_3 and $PM_{2.5}$ by both federal and State standards. Therefore, the SJVAPCD has prepared air quality plans to bring the SJVAB into attainment with both federal and State O_3 and $PM_{2.5}$ standards, which include the following:

- 2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standards, which describes San Joaquin Valley's strategies to demonstrate attainment with the federal $PM_{2.5}$ standards as expeditiously as possible

- Plan for the 2012 $PM_{2.5}$ Standard, which describes San Joaquin Valley's strategies to demonstrate attainment of the federal 2012 $PM_{2.5}$ standard as expeditiously as possible
- 2022 Plan for the 2015 8-Hour Ozone Standard, which describes San Joaquin Valley's strategies to ensure expeditious attainment of the federal 8-hour ozone standard
- Climate Change Action Plan, which provides guidance for assessing a project specific greenhouse gas emissions impact on global climate change, allows lead agencies to establish their own process and guidance for determining a project's global climate change impact, and addresses greenhouse gas emission reduction strategies.

SJVAPCD also implements rules to reduce emissions in the SJVAB in an effort to reach attainment of federal standards. Compliance with these rules is mandatory. These rules include:

- Regulation IV, Prohibitions
    - Rules 4305-4308 provide rules to limit emissions of Nitrogen Oxides (NO_X) and CO from boilers, steam generators, and process heaters.
    - Rule 4601-Architectural Coatings specifies storage, cleanup and labeling requirements for architectural coatings to limit Reactive Organic Gase (ROG) from architectural coatings.
- Regulations VIII, Fugitive PM_{10} Prohibitions, Rules 8011-8081 include regulations to reduce PM_{10} emissions during construction and demolition activities.

City of Fresno General Plan

The City of Fresno General Plan includes the following relevant policies related to air quality (City of Fresno, 2014a):

- **Policy LU-2-a: Infill Development and Redevelopment.** Promote development of vacant, underdeveloped, and re-developable land within the City Limits where urban services are available by considering the establishment and implementation of supportive regulations and programs.
- **Policy RC-4-c: Evaluate Impacts with Models.** Continue to require the use of computer models used by SJVAPCD to evaluate the air quality impacts of plans and projects that require such environmental review by the City.
- **Policy RC-4-h: Airport Actions.** Support Airport efforts to develop and maintain programs and policies to support City, State and federal efforts to achieve and maintain air quality standards.

3.4.2 Significance Thresholds

Significant impacts related to air quality would occur if implementation of the Proposed Project would result in any of the following:

a) Conflict with or obstruct implementation of the applicable air quality plan.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality

standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

3.4.3 Methodology

Construction and operational emissions inventory reports were conducted for the Proposed Project using the California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.9) and are included **Appendix B**. Criteria air pollutant and precursor emissions were evaluated for the Proposed Project, including O_3, CO, NO_x, ROGs, SO_2, PM_{10}, and $PM_{2.5}$. Additional information regarding these criteria pollutants and precursors is presented below.

3.4.3.1 Criteria Pollutants and Precursors of Interest

Ozone

O_3, or smog, is not emitted directly; rather, it is formed in the atmosphere through complex chemical reactions between ROG and NO_X in the presence of sunlight. O_3 formation is greatest on warm, windless, sunny days. The main sources of NO_X and ROG, often referred to as O_3 precursors, are (1) combustion processes (including motor vehicle and aircraft engines); (2) the evaporation of solvents, paints, and fuels; and (3) biogenic sources. O_3 levels usually build up during the day and typically peak in the afternoon. Short-term exposure can cause eye irritation and airway constriction. In addition to causing shortness of breath, O_3 can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema. Chronic exposure to high O_3 levels can permanently damage lung tissue. O_3 can also damage plants, trees, and materials such as rubber and fabrics.

Reactive Organic Gases

ROGs are a precursor to O_3 formation and are primarily emitted by industrial facilities, through combustion of fuel by mobile and stationary sources, and by use of chemical solvents. Per the USEPA, exposure to ROG emissions can cause irritation of the eyes, nose, and throat; headaches; loss of coordination; nausea; and damage to the liver, kidney, and central nervous system. Some ROGs are known to cause cancer.

Carbon Monoxide

CO is an odorless, colorless gas that is formed by the incomplete combustion of fuels. The most common source of CO is from motor vehicles. Emissions are highest during cold starts, hard acceleration, low speeds, and stop-and-go driving. When inhaled at high concentrations, CO combines with hemoglobin in the blood and lowers its oxygen-carrying capacity, resulting in reduced oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia, as well as for fetuses. Even healthy people exposed to high CO concentrations can experience headaches, dizziness, fatigue, unconsciousness, and death.

Nitrogen Oxides

NO_X is a precursor to O_3 and is primarily emitted through the combustion of fuel by mobile sources (e.g., passenger vehicles, buses, off-road equipment). When inhaled at high concentrations, NO_2, one of the types of NO_X, can cause irritation in the respiratory system. Per the USEPA, acute exposure can aggravate existing respiratory conditions (e.g., asthma) while long-term exposure may contribute to the development of asthma and potentially increase susceptibility to respiratory infections.

Sulfur Dioxide

SO_2 is not a significant transportation related pollutant with its largest source of emissions from burning fossil fuels at power plants and other industrial facilities. With most transportation sources using unleaded gasoline and ultra-low sulfur diesel fuel, emissions of sulfur dioxide from vehicles are considerably less than other larger emitters using fossil fuels. The physical effects of sulfur dioxide include temporary breathing impairment, respiratory illness, and aggravation of existing cardiovascular disease.

Particulate Matter

PM encompasses a wide range of solid and liquid particles in the atmosphere, including smoke, dust, aerosols, and metallic oxides. Most PM stems from combustion, factories, construction, grading, demolition, agricultural activities, and motor vehicles. Wood burning in fireplaces and stoves is another large source of fine particulates. Some PM, such as pollen, is naturally occurring. The USEPA currently regulates two types of PM emissions: PM_{10} and $PM_{2.5}$. PM_{10} is also referred to as respirable particulate matter. $PM_{2.5}$ is also referred to as fine particulate matter. PM_{10} is of concern because it bypasses the body's natural filtration system more easily than larger particles and can lodge deep into the lungs. PM_{10} can be emitted directly or formed in the atmosphere through complex chemical reactions from precursor pollutants such as NO_X, oxides of sulfur (SO_X), ROGs, and ammonia. $PM_{2.5}$ poses an increased health risk relative to PM_{10} because the particles are smaller and can deposit more deeply in the lungs, and they contain substances that are particularly harmful to human health. Exposure to PM can increase the risk of chronic respiratory disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, and decreased lung function.

3.4.3.2 Emission Sources

As discussed above, emissions of NO_X, CO, ROGs, SO_2, PM_{10}, and $PM_{2.5}$ are primarily emitted through the combustion of fuel by mobile sources and industrial facilities. The analysis evaluated the following sources that are expected to be associated with the construction of the Proposed Project: off-road equipment powered by diesel, gasoline, and natural gas; fugitive dust from site preparation and grading; on-road vehicle usage by workers and vendors accessing the project study area; paving of asphalt surfaces; application of architectural coating; and electricity usage (California Air Pollution Control Officers Association, 2022).

3.4.4 Existing Conditions / Environmental Setting

The Proposed Project is located in the city of Fresno which is within Fresno County and the boundaries of the SJVAB. The SJVAB consists of the following counties: Kings, Madera, San Joaquin, Merced, Stanislaus, Fresno, and Kern (portion). SJVAPCD has jurisdiction over the

SJVAB. The main natural factors that influence regional and local air quality relate to climate and topography, such as wind, atmospheric stability, terrain, and sunshine. Therefore, the presence of both natural factors, like those listed above, and existing air pollutant sources determine the air quality conditions of an area.

The County's terrain includes a wide range of elevations, with its highest point being about 14,000 feet above sea level in the Sierra peaks and its lowest point being 100 feet above sea level. The mountain ranges that surround the San Joaquin Valley contribute to the high pressure and low wind speeds which traps air pollutants in the valley. The average annual temperature at FAT is 78.1 degrees Fahrenheit with an average low of 47.7 degrees Fahrenheit and an average high of 84.5 degrees Fahrenheit. Average monthly precipitation ranges from 0 to 2.19 inches, with an annual average of 11.5 inches (National Oceanic and Atmospheric Administration, 2024). The wettest time of year in Fresno is typically around winter while the driest time is around summer.

USEPA and CARB have established health-based ambient air quality standards (NAAQS and CAAQS, respectively) for different criteria air pollutants (see **Table 3-1** for federal and State criteria air pollutants standards). If standards are met, the area is designated as in "attainment", and if the standards are exceeded, an area is designated as in "nonattainment." Currently, Fresno County is in nonattainment for O_3 and $PM_{2.5}$ and in maintenance for CO and PM_{10} under federal standards according to the USEPA (U.S. Environmental Protection Agency, 2024). Under State standards, Fresno County is in nonattainment for O_3, $PM_{2.5}$, and PM_{10} (San Joaquin Valley Air Pollution Control District, 2024a). The closest air quality monitors operated by CARB are located about 3.15-miles north and 3.2-miles south of the project study area (California Air Resources Board, 2024a).

Existing operational pollutant emissions were estimated using CalEEMod and are presented in **Table 3-2**.

Table 3-2: Estimated Operational Pollutant Emissions from the Existing ATCT (tons per year)

Source	ROG	CO	NO_x	SO_2	PM_{10}	$PM_{2.5}$
Existing ATCT/a/	2.47	19.1	1.76	0.02	1.24	0.33

/a/ CalEEMod estimates operational emissions based on the year that the facility became fully operational. However, CalEEMod only provides estimates from 2010 on, so that was the year selected as the year the existing ATCT facility became operational. Because the existing ATCT facility became operational in 1961, the emissions are potentially higher than what is presented, so this table provides a conservative baseline to compare future operational pollutant emissions.

Source: CalEEMod, 2025; RS&H, 2025

3.4.5 Environmental Impacts and Mitigation

3.4.5.1 Conflict with or obstruct implementation of the applicable air quality plan

For a project to be consistent with SJVAPCD attainment plans, the pollutants emitted from construction and demolition and project operation should not exceed the SJVAPCD daily thresholds, cause a significant impact on air quality, or the project must already have been included in the attainment plans projection. SJVAPCD identified thresholds for pollutants in its 2015 Guidance for Assessing and Mitigating Air Quality Impacts (San Joaquin Valley Air Pollution Control District, 2015). **Table 3-3** below shows SJVAPCD air quality criteria and

Table 3-3: De Minimis Emission Thresholds

Pollutants	Federal / State Attainment Status (Severity)	Federal Threshold (tons per year)	SJVAPCD Threshold (tons per year)
Ozone (O_3)	Nonattainment (Extreme) / Severe Nonattainment	10	10
Carbon Monoxide (CO)	Maintenance / Attainment	100	100
Nitrogen Dioxide (NO_2)	Attainment / Attainment	100/a/	10
Sulfur Dioxide (SO_2)	Attainment / Attainment	100/a/	27
Particulate Matter (PM_{10})	Maintenance / Nonattainment	100	15
Particulate Matter – Fine ($PM_{2.5}$)	Nonattainment (Moderate) / Nonattainment	70	15

/a/ No NAAQS *de minimis* threshold exists for attainment pollutants. As a conservative approach, the *de minimis* threshold for maintenance was assumed for attainment pollutants.
SJVAPCD = San Joaquin Valley Air Pollution Control District
Source: USEPA *De Minimis* Tables https://www.epa.gov/general-conformity/de-minimis-tables, USEPA, 2024; SJVAPCD, 2015

precursor pollutant thresholds of significance, which includes thresholds for construction and operational emissions.

Construction of the Proposed Project would result in a temporary increase of air pollutant emissions in the area. Therefore, a construction emissions inventory (CEI) was conducted to analyze the air pollutant emissions that would occur during construction. As shown in **Table 3-4**, no criteria air pollutant emissions associated with the implementation of the Proposed Project would exceed NAAQS or SJVAPCD *de minimis* thresholds (see **Appendix B** for the detailed report). Additionally, reasonably available dust control and emissions control measures would be required by the City to be implemented by the contractor to further minimize air emissions as follows:

- Construction sequencing
- Require the use of equipment that meets Tier IV emission standards
- Minimization of exposed soils at any given time during construction activities
- Water spray for dust suppression and preventing fugitive dust from becoming airborne from construction vehicles
- Suspending or adjusting intensity of earthwork during periods of sustained high wind speeds (e.g., 30 mph and over), as defined by the Occupational Safety and Health Administration (OSHA)
- Maintaining construction vehicles in good working condition
- Limiting construction vehicle engine idling by turning off engines after three to five minutes of inactivity

Table 3-4: Total Annual Construction Emissions of Proposed Project Compared to NAAQS and SJVAPCD Standards (tons per year)

	ROG	CO	NO_x	SO_2	PM_{10}	$PM_{2.5}$
Proposed Project (2027)	0.17	1.98	1.36	<0.005	0.18	0.09
Proposed Project (2028)	0.49	0.99	0.77	<0.005	0.11	0.03
NAAQS Thresholds	10 tons/yr	100 tons/yr	100 tons/yr	100 tons/yr	100 tons/yr	70 tons/yr
SJVAPCD Threshold	10 tons/yr	100 tons/yr	10 tons/year	27 tons/yr	15 tons/yr	15 tons/yr
Exceedance of Threshold?	No	No	No	No	No	No

NAAQS = National Ambient Air Quality Standards
SJVAPCD = San Joaquin Valley Air Pollution Control District
Source: USEPA, 2024; SJVAPCD, 2015; CalEEMod, 2025; RS&H, 2025

- Decreasing vehicle speed limits while onsite to reduce fugitive dust generation and obeying posted vehicle speed limits while off-site
- Requiring construction contractors to use properly maintained and operated construction equipment
- Not overloading construction trucks beyond their maximum hauling capacity with fill borrow material or construction debris
- Using tarp covers on construction trucks transporting construction materials and construction debris to and from the site
- Re-vegetating areas of disturbance following completion of construction activities in designated area

The Proposed Project would not conflict with or obstruct implementation of the SJVAPCD Basin Plan, would not result in a cumulatively considerable increase of any criteria pollutant for which Fresno County or SJVAB is in nonattainment for, would not expose sensitive receptors to substantial pollutant concentrations, and would not expose a substantial number of people to adverse emissions.

Operation of the Proposed Project would not increase landside or airside capacity at the Airport. The Proposed Project would not result in a change in aircraft operations (takeoffs and landings), and the existing runway configuration, arrival/departures procedures, and runway use percentages would remain unchanged.

The Proposed Project would provide replacement facilities for the existing ATCT that was built in 1961. The new ATCT would be consistent with the California Green Building Standards Code (CALGreen) 2025 Building Efficiency Standards and would be more energy-efficient and produce less emissions than the existing ATCT facilities via new construction techniques, better insulation of the structure, more efficient windows, as well as new generation stationary sources (boilers, power plants, etc.). Because of the improvements in efficiency and increased

regulations on emissions from buildings and equipment, the new ATCT would have less emissions than the existing.

Table 3-5 presents the estimated operational emissions of the new ATCT at opening year (2028) and the net change between the estimated existing operational emissions and future operational emissions with implementation of the Proposed Project.

Table 3-5: Operation Emissions Estimates and Net Change from Existing Emissions Estimates Compared to NAAQS and SJVAPCD Standards (tons per year)

	ROG	CO	NO_x	SO_2	PM_{10}	$PM_{2.5}$
Existing ATCT	2.47	19.10	1.76	0.02	1.24	0.33
Proposed Project (2028)	0.16	0.67	0.06	<0.005	0.17	0.05
Net Change	-2.31	-18.43-	-1.70	-0.0105	-1.07	-0.28
NAAQS Thresholds	10 tons/yr	100 tons/yr	100 tons/yr	100 tons/yr	100 tons/yr	70 tons/yr
SJVAPCD Threshold	10 tons/yr	100 tons/yr	10 tons/year	27 tons/yr	15 tons/yr	15 tons/yr
Exceedance of Threshold?	No	No	No	No	No	No

Source: USEPA, 2024; SJVAPCD, 2015; CalEEMod, 2025; RS&H, 2025

The Proposed Project would comply with all applicable federal, State, and local construction and facility requirements related to air pollution, as identified in **Section 3.4.1**. Therefore, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, and the impact would be ***less than significant***.

3.4.5.2 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard

As shown in **Table 3-4** and **Table 3-5**, no criteria air pollutant emissions associated with implementation of the Proposed Project would exceed *de minimis* thresholds. Dust control measures implemented under SJVAPCD Regulation VIII would further reduce the amount of emissions from construction activities and compliance with current building efficiency standards would limit operational emissions to below existing conditions. Therefore, the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant. The impact would be ***less than significant***.

3.4.5.3 Expose sensitive receptors to substantial pollutant concentrations

The closest sensitive receptors are residences approximately 0.5 miles west of the project study area. Because the Proposed Project would not result in any exceedances of pollutant emissions and because of the distance to the closest sensitive receptor, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations. The impact would be ***less than significant***.

3.4.5.4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

During construction, the various diesel-powered vehicles and equipment in use onsite would create localized odors. These odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project study area. Potential diesel odor impacts would not adversely affect a substantial number of people as construction would occur solely on Airport property, approximately 0.5 miles east of the nearest residences off North Winery Avenue. In addition, major sources of odors include restaurants, manufacturing plants, and industrial facilities. The proposed uses that would be developed with implementation of the Proposed Project are not expected to produce any offensive odors that would result in frequent odor complaints because the above identified substantial odor-generating sources are not proposed. The Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and there would be ***no impact***.

3.5 Biological Resources

This section describes the existing setting related to biological resources based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.5.1 Regulatory Setting

3.5.1.1 Federal

Federal Endangered Species Act

The federal Endangered Species Act (ESA) protects plants and wildlife that are listed by the USFWS and National Marine Fisheries Service (NMFS) as endangered or threatened.

Section 9 of the ESA prohibits the “take” of federally-listed species, where take is defined as to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct” (U.S. Fish and Wildlife Service, 2024a). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land, as well as removing, cutting, digging up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law.

Section 7 of the ESA requires agencies to consult with U.S. Fish & Wildlife Service (USFWS) or NMFS if their actions, including permit approvals or funding, could adversely affect an endangered species (including plants) or its critical habitat (U.S. Fish and Wildlife Service, 2024b). Through consultation and the preparation of a Biological Opinion, USWFS or NMFS may issue an incidental take permit allowing the take of a federally listed species, provided the action would not jeopardize the continued existence that species.

In cases where the federal agency determines its action may affect a federally listed species, but that such effects would not likely be adverse, the agency must consult and receive concurrence from USFWS and/or NMFS. This informal consultation typically involves incorporating measures to ensure that project effects would not be adverse. Concurrence from the USFWS and/or NMFS concludes the informal process. Without such concurrence, the federal agency must formally consult to ensure full compliance with ESA.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act prohibits the incidental “take” of nearly all native birds, in which take is defined as to “kill, directly harm, or destroy individuals, eggs, or nests, or to otherwise cause failure of an ongoing nesting effort” (16 USC Section 703).

Bald Eagle and Golden Eagle Protection Act

The Bald Eagle and Golden Eagle Protection Act prohibits the “take” of bald eagles (*Haliaeetus leucocephalus*) or golden eagles (*Aquila chrysaetos*), their nests, or their eggs except when issued a permit by the U.S. Department of Interior (DOI), in which take is defined as to "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb," (16 USC Section 668) and includes disturbance that interferes with breeding and nesting behavior.

Clean Water Act

The federal Water Pollution Control Act Amendments of 1972 (33 USC Sections 1251– 1376), as amended by the Water Quality Act of 1987, and better known as the Clean Water Act, is the major federal legislation governing water quality. The purpose of the Clean Water Act is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Discharges into waters of the United States are regulated under Clean Water Act Section 404. Waters of the United States include: (1) The territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including waters which are subject to the ebb and flow of the tide; (2) Tributaries; (3) Lakes and ponds, and impoundments of jurisdictional waters; and (4) Adjacent wetlands (40 CFR 120.2). Important applicable sections of the Clean Water Act are discussed below:

- Section 303 requires states to develop water quality standards for inland surface and ocean waters and submit them to the U.S. Environmental Protection Agency (USEPA) for approval. Under Section 303(d), the state is required to list waters that do not meet water quality standards and to develop action plans to improve water quality.
- Section 304 provides water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state (or Tribes that have been approved for ''treatment as a State" status) that the discharge will comply with other provisions of the Clean Water Act. In California, certification is typically provided by the applicable Regional Water Quality Control Board (RWQCB). A Section 401 Water Quality Certification from the Central Valley Regional Water Quality Control Board (CVRWQCB) would be required for the Proposed Project if a Section 404 permit were required (see below for description of permitting under Section 404).
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting program regulating the discharge of pollutants (except for dredge or fill material) into waters of the United States. The program is administered by the RWQCB.
- Section 404 provides for the issuance of dredge/fill permits by the U.S. Army Corps of Engineers. Tidally influenced waters that lie below "high tide line" and non-tidal waters that lie below" ordinary high water" would be subject to regulation under Section 404.

3.5.1.2 State

California Endangered Species Act

The California Endangered Species Act (CESA) authorizes the California Fish and Game Commission (CFGC) to designate endangered, threatened, and rare species and to regulate the taking of these species (California Fish and Game Code [F.G.C.] Sections 2050–2098). CESA defines endangered species as those whose continued existence in California is jeopardized. State-listed threatened species are those not presently facing extinction but that may become endangered in the foreseeable future. F.G.C. Section 2080 prohibits the taking of state-listed plants and animals. The California Department of Fish and Wildlife (CDFW) also designates fully protected or protected species as those that may not be taken or possessed. Species

designated as fully protected or protected may or may not be listed as endangered or threatened. When a species is both state- and federally listed, an expedited request for consistency with the federal biological opinion may be issued through a request for a Section 2080.1 consistency determination. In addition, F.G.C. Section 3503 states, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto."

California Fish and Game Code

The CFGC implements the F.G.C. as authorized by Article IV, Section 20, of the Constitution of the State of California. F.G.C. Sections 3503, 3503.5, 3505, 3800, and 3801.6 protect all native birds, birds of prey, and nongame birds, including their eggs and nests, that are not already listed as fully protected and that occur naturally within the state. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (e.g., hawks, owls, eagles, and falcons), including their nests or eggs. CDFW is the state agency that manages native fish, wildlife, plant species, and natural communities for their ecological value and their benefits to people.

The F.G.C. designates certain fish and wildlife species as "fully protected" under Sections 3511 (birds), 4700 (mammals), 5050 (reptiles and amphibians), and 5515 (fish). Fully protected species may not be taken or possessed at any time, and no permits may be issued for the Proposed Project for incidental take of these species.

Porter-Cologne Water Quality Control Act

The State of California regulates activities that would involve "discharging waste, or proposing to discharge waste, within any region that could affect waters of the state" (California Water Code 13260[a]), pursuant to provisions of the Porter-Cologne Water Quality Control Act. Waters of the State are defined as "any surface water or groundwater, including saline waters, within the boundaries of the state." Such waters may include waters not subject to regulation under Section 404. These waters may include other types of isolated wetlands (e.g., vernal pools) and other aquatic habitats not normally subject to federal regulation under Section 404 of the Clean Water Act.

California Native Plant Society

The California Native Plant Society (CNPS) is a non-profit conservation organization dedicated to monitoring and protecting sensitive plant species in California. The CNPS compiled the Rare and Endangered Plant Inventory, an online database containing information on rare, threatened, and endangered vascular plant species of California, including qualitative characterizations and geographic distribution of these species. CDFW has used the inventory as a potential candidate list for plants being considered for listing as threatened or endangered. The CNPS has developed categories of rarity, referred to as California Rare Plant Ranks (CRPRs), of which CRPRs 1A, 1B, 2A, and 2B are considered particularly sensitive:

- CRPR-1A Presumed extirpated in California and either rare or extinct elsewhere.
- CRPR-1B Plants rare, threatened, or endangered in California and elsewhere.
- CRPR-2A Presumed extirpated in California, but more common elsewhere.

- CRPR-2B Plants rare, threatened, or endangered in California, but more common elsewhere.
- CRPR-3 Plants about which we need more information – a review list.
- CRPR-4 Plants of limited distribution – a watch list.
- The CNPS appends CRPR categorizations with "threat ranks" that parallel the rankings used by the CDFW's California Natural Diversity Database (CNDDB).[10] These threat ranks are added as a decimal code after the CRPR category as follows:
- .1 – Seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat).
- .2 – Fairly endangered in California (20 to 80 percent occurrences threatened).
- .3 – Not very endangered in California (less than 20 percent of occurrences threatened or no current threats known).

3.5.1.3 Regional and Local

City of Fresno General Plan

The City of Fresno General Plan includes the following relevant policies relating to biological resources:

- **Policy POSS-5-c, Buffers for Natural Areas.** Ensure new developments include natural elements—like ponds, tree belts, or hedgerows—as protective buffers next to ecologically sensitive areas.
- **Policy POSS-6-b, Effects of Stormwater Discharge.** Promote efforts to reduce harmful effects of stormwater on aquatic life. Prevent urban runoff from entering the river or nearby habitats. Only allow development on draining sites if strong pollution controls are in place. Regularly monitor water and sediment near drainage points and take corrective action if contamination is detected.
    - Avoid discharge of runoff from urban uses to the San Joaquin River or other riparian corridors.
    - Approve development on sites having drainage (directly or indirectly) to the San Joaquin River or other riparian areas only upon a finding that adequate measures for preventing pollution of natural bodies of water from their runoff will be implemented.
    - Periodically monitor water quality and sediments near drainage outfalls to riparian areas. Institute remedial measures promptly if unacceptable levels of contaminant(s) occur.

[10] The CNDDB inventories the status and locations of rare plants and animals in California. CNDDB staff work with partners to maintain current lists of rare species as well as maintain a growing database of GIS-mapped locations for these species.

City of Fresno Municipal Code

Chapter 13, Article 3 of the City of Fresno Municipal Code provides guidelines and requirements pertaining to the preservation and protection of existing street trees and establishes guidelines establishing the installation of City-owned trees along streets.

3.5.2 Significance Thresholds

Significant impacts related to biological resources would occur if implementation of the Proposed Project would result in any of the following:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.5.3 Methodology

The evaluation of potential impacts on biological resources in the vicinity of FAT is based on information obtained from previous studies at the Airport as well as database and literature reviews. The potential for the Proposed Project to affect plant and wildlife resources was determined by reviewing applicable laws, regulations, and policies designed to protect sensitive and special-status resources.

The following biological databases were queried for records of special-status plants, natural communities, and wildlife that might have potential to occur in or near the project study area:

- USFWS list of federally listed and proposed endangered, threatened, and candidate species and their designated critical habitat
- NMFS list of federally listed and proposed endangered, threatened, and candidate species and their designated critical habitat

- CNPS online Inventory of Rare and Endangered Vascular Plants of California
- CDFW CNDDB

3.5.4 Existing Conditions / Environmental Setting

The project study area is in the Clovis, California U.S. Geological Survey (USGS) 7.5-minute quadrangle (Clovis Quad). Candidate, sensitive, or special status species that have the potential to be present within the Clovis Quad, as reported by CDFW's CNDDB, are listed in **Table 3-6** (California Department of Fish and Wildlife, 2024). However, the project study area is located in an urbanized area and within an operational airport facility and is currently developed with the existing ATCT, a parking lot, and landscaping.

Due to the urban location, the project study area does not provide suitable habitat for special-status animal species. Common wildlife species that are adapted to urban environments are expected to continue to use the site and vicinity after redevelopment.

Riparian areas are transitional zones between terrestrial and aquatic systems that are typically vegetated with grasses, forbs, shrubs, and trees that are tolerant of periodic flooding and have sediments that are rich in nutrients and organic matter (California Wildlife Conservation Board, 2024). No riparian habitat or other sensitive natural communities occur within or near the project study area. No aquatic resources occur within or near the project study area.

3.5.5 Environmental Impacts and Mitigation

3.5.5.1 Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service

Due to the urban location, the project study area does not provide suitable habitat for special-status animal species. Common wildlife species that are adapted to urban environments are expected to continue to use the site and vicinity after redevelopment. Therefore, the Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. There would be ***no impact***.

3.5.5.2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service

As previously identified, the project study area consists entirely of urban/developed areas. As a result, the Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations by CDFW or USFWS. There would be ***no impact***.

Table 3-6: Federal and State Candidate, Sensitive, or Special Status Species in the Clovis Quadrangle

Species	Federal Status	State Status
California tiger salamander - central California Distinct Population Segment	Threatened	Threatened / CDFW Watch List
western spadefoot	Proposed Threatened	None / CDFW Species of Special Concern
Swainsons hawk	None	Threatened
western yellow-billed cuckoo	Threatened	Endangered
tricolored blackbird	None	Threatened / CDFW Species of Special Concern
double-crested cormorant	None	None / CDFW Watch List
burrowing owl	None	None/ CDFW Species of Special Concern
least Bells vireo	Endangered	Endangered
vernal pool fairy shrimp	Threatened	None
California linderiella	None	None
Crotch bumble bee	None	Candidate Endangered
American bumble bee	None	None
Antioch efferian robberfly	None	None
Hurds metapogon robberfly	None	None
molestan blister beetle	None	None
American badger	None	None/ CDFW Species of Special Concern
Northern California legless lizard	None	None/ CDFW Species of Special Concern
California glossy snake	None	None/ CDFW Species of Special Concern
western pond turtle	Proposed Threatened	None/ CDFW Species of Special Concern
coast horned lizard	None	None/ CDFW Species of Special Concern
Sanfords arrowhead	None	None / California Rare Plant Rank 1B.2
California jewelflower	Endangered	Endangered/ California Rare Plant Rank 1B.1
California satintail	None	None/ California Rare Plant Rank 2B.1
Greenes tuctoria	Endangered	Rare/ California Rare Plant Rank 1B.1
Madera leptosiphon	None	None/ California Rare Plant Rank 1B.2

Notes:
CDFW = California Department of Fish and Wildlife
California Rare Plant Ranks:
1B.1 = Plants rare, threatened, or endangered in California and elsewhere; seriously threatened in California
1B.2 = Plants rare, threatened, or endangered in California and elsewhere; fairly threatened in California
2B.1 = Plants rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California

3.5.5.3 Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means

No aquatic resources occur within or near the project study area. The project study area consists entirely of urban/developed areas. As a result, the Proposed Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to,

marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. There would be ***no impact***.

3.5.5.4 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites

The FAA ACs provide guidance on compliance with CFR Title 14. Title 14 CFR Part 139 Subpart D, Section 139.337 Wildlife Hazard Management defines basic requirements for hazardous wildlife management for airports that hold Airport Operating Certificates, and refers to AC 150/5200-33C *Hazardous Wildlife Attractants on or Near Airports* for "methods and procedures for wildlife hazard management at airports that are acceptable to the Administrator" (FAA, 2004). This AC is required to be followed by airports that receive funding from federal grant assistance programs (e.g., Airport Improvement Program) or the Passenger Facility Charge program, and by planners of projects or activities on or near airports.

During the past century, wildlife-aircraft strikes have resulted in the loss of hundreds of lives worldwide, as well as billions of dollars in aircraft damage. Many public-use airports have large open and undeveloped lands that can present potential hazards to aviation which may encourage wildlife (such as migratory birds) to enter an airport's approach or departure airspace or airport operations area (AOA). The FAA recommends 5 statute miles between the farthest edge of the airport's AOA and a hazardous wildlife attractant if the attractant could cause hazardous wildlife movement into or across the approach or departure airspace. Hazardous wildlife attractants can include trees, open bodies of water, and other habitats that could attract wildlife that can end up on an airport and collide with aircraft.

The project study area and surrounding area are completely developed and do not include any areas of undisturbed or minimally disturbed vegetation. While the San Joaquin River corridor functions as a wildlife movement corridor for a number of terrestrial and aquatic mammals and birds, the remaining portions with the City's planning area, which includes the project study area, do not provide substantive linkages to be considered as part of a wildlife movement corridor. Due to the noise produced by a working airport, the regular human activity within the project study area, and only landscaping that is regularly maintained occurring within the project study area, it is unlikely that native or migratory wildlife species would regularly use the project study area.

As a result, the Proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. There would be ***no impact***.

3.5.5.5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance

The Proposed Project is subject to provisions of the City's Municipal Code regarding trees on public property (Article 3 of Section 13 of the City of Fresno Municipal Code), which provides guidelines and requirements for the preservation and protection existing street trees, as well as guidelines establishing the installation of city-owned trees along streets. For City projects that include tree removal, the provision states that the Public Works Director shall be responsible for the preservation and, when required herein, the removal of all trees on public property. No other local policies protecting biological resources are relevant to the Proposed Project. Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. There would be ***no impact***.

3.5.5.6 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan

The PG&E San Joaquin Valley Operation and Maintenance Habitat Conservation Plan (HCP) was approved in 2007 and covers portions of nine counties, including Fresno County (PG&E, 2006). This HCP covers PG&E activities which occur as a result of ongoing operations and maintenance that would have an adverse impact on any of the 65 covered species and provides incidental take coverage from USFWS and CDFW. The project study area is not located within the covered area of any HCP, Natural Community Conservation Plan, or other adopted local, regional or state HCP. Therefore, the Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be ***no impact***.

3.6 Cultural and Tribal Resources

This section describes the potential for cultural and tribal resources to be present within the project study area as a basis for the discussion of potential impacts and proposed mitigation measures for the Proposed Project at FAT.

The information in this section is based on a Cultural Resources Assessment prepared for the Proposed Project, which is included in **Appendix C** of this EIR.

3.6.1 Regulatory Setting

3.6.1.1 Federal

National Historic Preservation Act

The principal federal law addressing historic properties is the National Historic Preservation Act (NHPA), as amended (54 USC § 300101 et seq.), and its implementing regulations (36 CFR Part 800). Section 106 of the NHPA (36 CFR Part 800 et seq.) requires federal agencies to account for the effects of a federal action on historic properties and to consult with the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officers (THPO), and other parties to develop and evaluate alternatives or modifications to avoid, minimize, or mitigate adverse effects on historic properties.

For the purposes of Section 106, historic properties are defined as prehistoric and historic sites, buildings, structures, districts, landscapes, and objects that are either eligible for or listed in the National Register of Historic Places (NRHP), as well as artifacts, records, and remains related to such properties (36 CFR Part 800 et seq., n.d.). Historic properties can also include those cultural resources that are associated with the cultural practices or beliefs of a living community (Advisory Council on Historic Preservation, 2021). The implementing regulations (36 CFR Part 800) describe the processes for identifying and evaluating historic properties, assessing the potential adverse effects of federal undertakings on historic properties, and developing measures to avoid, minimize, or mitigate adverse effects. The Section 106 process does not require the preservation of historic properties; instead, it is a procedural requirement mandating that, prior to granting approval, federal agencies take into account the direct and indirect impacts on historic properties that could result from federal actions.

National Register of Historic Places

The NRHP was established by the NHPA as “an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment”. The NRHP recognizes properties that are significant at the national, state, and/or local levels.

NRHP criteria may also be applied to determine if a resource may be listed in the California Register of Historical Resources (CRHR), and therefore significant pursuant to CEQA. PRC Section 5024.1(c) lists the NRHP criteria that would qualify a resource to be listed in the CRHR.

The NRHP is the nation’s official list of buildings, structures, objects, sites, and districts in the U.S. that are significant in American history, architecture, engineering, archeology, and culture. To qualify for evaluation of eligibility in the NRHP, a property must be at least 50 years old, or it

must possess exceptional significance. The criteria used to evaluate historic properties for inclusion in the NRHP are summarized below:

A. Event – Properties associated with events that have made a significant contribution to the broad patterns of our history.

B. Person – Properties associated with the lives of persons significant in our past.

C. Architecture/Engineering – Properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

D. Archaeology – Properties that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of these evaluation criteria, a historic property must retain integrity in order to convey its significance. Integrity is measured by the following seven aspects:

- Location – The place where the historic property was constructed or where the historic event occurred.
- Design – The combination of elements that create the form, plan, space, structure, and style of the property.
- Setting – The physical environment of the historic property.
- Materials – The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the historic property.
- Workmanship – The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling – The property's expression of the aesthetic or historic sense of a particular period of time.
- Association – The direct link between an important historic event or person and a historic property.

Archaeological and Historic Preservation Act

The Archaeological and Historic Preservation Act of 1974 (54 USC §§ 312501-312508) requires that all federal agencies preserve historic and archaeologic objects and materials that would otherwise be lost or destroyed as a result of a federal action, federally-licensed action, or federally-funded action.

3.6.1.2 State

California Register of Historic Places

The California Register of Historic Places (CRHP) includes resources that are listed in or formally determined eligible for listing in the NRHP, as well as some California State Landmarks and California Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resource inventory that may be eligible for listing in the

CRHR are presumed to be significant resources for the purposes of CEQA unless a preponderance of evidence indicates otherwise (PRC 5024.1, 14 CCR 4850 et seq).

The eligibility criteria for listing in the CRHP are similar to those for the NRHP but focus on the importance of the resources to California history and heritage. A cultural resource may be eligible for listing in the CRHP if:

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

In addition to meeting one of the evaluation criteria, the resource must retain integrity. The CRHP definition of integrity is slightly different from that of the NRHP. Section 4852(c) of the CCR (14 CCR 4852) defines integrity as “the authenticity of a historical resources’ physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” The regulation also states that eligible resources must “retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance,” and then lists the same seven aspects of integrity used for evaluating properties for the NRHP (location, design, materials, workmanship, setting, feeling, and association).

Assembly Bill 52

Assembly Bill 52 (AB 52) amended the California PRC and requires lead agencies to consult with California Native American tribes to identity, evaluate, and mitigate impacts to a new type of cultural resource called “tribal cultural resources”, if the tribes formally request consultation. A tribal cultural resource is any of the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    - Included or determined to be eligible for inclusion in the CRHR.
    - Included in a local register of historical resources as defined in subdivision (k) of PRC Section 5020.1.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

A cultural landscape that meets the criteria of PRC Section 5024.1 subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size

and scope of the landscape. A historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in subdivision (g) of PRC Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of PRC Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Health and Safety Code 7050.5

California Health and Safety Code 7050.5 requires that in the event of discovery of human remains, the county coroner shall be immediately notified and there shall be no further excavation or disturbance of the site until the coroner has determined the origin and disposition of the remains, pursuant to PRC 5097.98. If the remains are determined to be Native American, the coroner must contact the Native American Heritage Commission (NAHC). The NAHC will determine the Most Likely Descendant (MLD).

3.6.1.3 Regional and Local

City of Fresno General Plan

The Historic and Cultural Resources Element of the City of Fresno's General Plan provides policy guidance to protect, preserve, and enhance the City's cultural and historic resources (City of Fresno, 2014a). The following are the relevant policies related to historic and cultural resources:

- **Policy HCR-2-a: Identification and Designation of Historic Properties.** Work to identify and evaluate potential historic resources and districts and prepare nomination forms for Fresno's Local Register of Historic Resources and California and National registries, as appropriate.
- **Policy HCR-2-b: Historic Surveys.** Prepare historic surveys according to California Office of Historic Preservation protocols and City priorities as funding is available.
- **Policy HCR-2-c: Project Development.** Prior to project approval, continue to require a project site and its Area of Potential Effects (APE), without benefit of a prior historic survey, to be evaluated and reviewed for the potential for historic and/or cultural resources by a professional who meets the Secretary of Interior's Qualifications. Survey costs shall be the responsibility of the project developer. Council may, but is not required, to adopt an ordinance to implement this policy.
- **Policy HCR-2-d: Native American Sites.** Work with local Native American tribes to protect recorded and unrecorded cultural and sacred sites, as required by State law, and educate developers and the community-at-large about the connections between Native American history and the environmental features that characterize the local landscape.
- **Policy HCR-2-f: Archaeological Resources.** Consider State Office of Historic Preservation guidelines when establishing CEQA mitigation measures for archaeological resources.
- **Policy HCR-2-g: Demolition Review.** Review all demolition permits to determine if the resource scheduled for demolition is potentially eligible for listing on the Local Register of Historic Resources. Consistent with the Historic Preservation Ordinance, refer

potentially eligible resources to the Historic Preservation Commission and as appropriate to the City Council.

- **Policy HCR-2-k: City-Owned Resources.** Maintain all City-owned historic and cultural resources in a manner that is consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, as appropriate.
- **Policy HCR-3-c: Context Sensitive Design.** Work with architects, developers, business owners, local residents and the historic preservation community to ensure that infill development is context-sensitive in its design, massing, setbacks, color, and architectural detailing.

City of Fresno Historic Preservation Ordinance

The City of Fresno has established their own Historic Preservation Commission and Local Register of Historic Resources through their Historic Preservation Ordinance (Fresno Municipal Code, Chapter 12, Article 16) (City of Fresno, 2024b). The Ordinance provides local levels of control and protection over special historic, architectural, aesthetic, or cultural value within the City. Under the Ordinance, any building, structure object, or site may be designated as a Historic Resource if it is found by the Historic Preservation Commission and City Council to meet the following criteria:

(1) It has been in existence more than fifty years and it possesses aspects of integrity to convey its significance based upon location, design, setting, materials, workmanship, feeling or association, and:

  (i) It is associated with events that have made a significant contribution to the broad patterns of our history; or

  (ii) It is associated with the lives of persons significant in our past; or

  (iii) It embodies the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values; or

  (iv) It has yielded or may be likely to yield, information important in prehistory or history.

(2) It has been in existence less than fifty years, it meets the criteria of subdivision (1) of subsection (a) of this section and is of exceptional importance within the appropriate historical context, local, state or national.

3.6.2 Significance Thresholds

Significant impacts related to cultural resources would occur if implementation of the Proposed Project would result in any of the following:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

c) Disturb any human remains, including those interred outside of formal cemeteries.

The CEQA Guidelines defines impacts on archaeological and historical resources as follows:

- Substantial adverse change in the significance of a historical resource by physical demolition, destruction, relocation, or alteration of the resource of its immediate surroundings as defined in Section 15064.5.
- Demolishes or materially alters those physical characteristics of a historical resource that conveys its significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR, or inclusion in a local register, as defined Section 15064.5.

For tribal cultural resources, impacts would be considered significant if a project would result in any of the following:

a) Cause a substantial adverse change in the significance of a tribal cultural resources, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

   ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.6.3 Methodology

The methodology to identify and evaluate potential effects on cultural and tribal resources is detailed in the Cultural Resources Assessment in **Appendix C**.

3.6.3.1 Cultural Resources

The methodology includes the development of the project study area and then the preparation of the Cultural Resources Assessment. The Cultural Resources Assessment included a records search completed by staff at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield. An intensive-level architectural survey was conducted of the existing ATCT facility on September 11, 2023, by a Professionally Qualified Staff (PQS) architectural historian. The architectural historian recorded the structural and architectural characteristics and current conditions of the building and associated features. They also conducted a limited reconnaissance-level survey of the buildings adjacent to the existing ATCT, the Airport maintenance building and the ARFF.

3.6.3.2 Tribal Resources

Consultation letters were sent out pursuant to AB 52 to the following eleven tribes on December 17, 2024, to assist with the identification of Native America resources within the project study area. See **Appendix C** for a sample letter that was mailed to the tribes.

- Amah Mutsun Tribal Band
- Dumna Wo-Wah Tribal Government
- Kitanemuk and Yowlumne Tejon Indians

- North Fork Rancheria of Mono Indians
- Northern Valley Yokut / Ohlone Tribe
- Picayune Rancheria of the Chukchansi Indians
- Santa Rosa Rancheria Tachi Yokut Trive
- Table Mountain Rancheria
- Traditional Choinumni
- Tule River Indian Tribe
- Wuksachi Indian Tribe / Eshom Valley Band

3.6.4 Existing Conditions / Environmental Setting

3.6.4.1 Historic Resource

As described in the Cultural Resources Assessment (**Appendix C**), one structure within the project study area, the existing ATCT, was determined to be eligible for listing on the NRHP.

The ATCT was designed by master architect and Fresno native Allen Y. Lew, Fellow of the American Institute of Architects (FAIA), and was completed in 1961. The ATCT was designed in the International style and embodies many of the distinctive characteristics of International style of architecture, including: simple, rectilinear geometric form; concrete and steel construction; unadorned wall surfaces that are generally smooth; absence of ornamentation; flat roofs; large areas of glass; and bands of metal-framed windows that are flush with the exterior walls. The ATCT had only a few minor alterations (two vents and two window-mounted air conditioning units), so it is a highly intact representative example of the International style of architecture as applied to an ATCT.

The ATCT is significant under Criterion C as a highly intact representative example of the International style of architecture as applied to an ATCT and as a good example of the work of master architect Allen Y. Lew, FAIA. The ATCT retains high integrity of location, design, materials, workmanship, feeling, and association. Its period of significance is 1961, when it was first occupied.

3.6.4.2 Archeological Resource

The Cultural Resources Assessment reported negative results of the records search for archaeological resources and determined that, due to the severely disturbed/obscured nature of the project study area, it has very low sensitivity for archaeological resources.

3.6.4.3 Tribal Resources

Following the initiation of consultation with tribes on December 17, 2024, one response was received from the Traditional Choinumni Tribe that they do not see any issues with the Proposed Project at this time (see **Appendix C**).

3.6.5 Environmental Impacts and Mitigation

3.6.5.1 Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5

The Proposed Project would demolish the NRHP-eligible existing ATCT. The State CEQA Guidelines (CCR Section 15064.5) state that a project that may cause a substantial adverse change in the significance of a historical resource (such as damaging or destroying the qualities that make it significant) is a project that may have a significant effect on the environment.

Demolition constitutes a substantial adverse change in the significance of a historic resource and would be considered a ***potentially significant impact*** on a historical resource as defined in Section 15064.5.

Mitigation Measure CUL-1: Execution of a Memorandum of Agreement

Mitigation Measures have been developed in coordination with SHPO, FAA, the City, and the Fresno County Historical Society. These mitigation measures are documented in a Memorandum of Agreement (MOA) (see **Appendix C**) between SHPO and FAA. These mitigation measures include:

- MOA Measure 1: Prepare documentation of the existing ATCT to meet modified Historic American Building Survey (HABS) Level II-like standards. Submit the HABS documentation to SHPO, the Fresno County Historical Society, and the Fresno County Public Library.
- MOA Measure 2: Prepare and provide educational information to the public regarding the existing ATCT in the form of interpretive signage to be placed within the Airport terminal building. The interpretive sign will include a narrative historic context, historic photographs, and, if feasible, salvaged architectural elements of the existing ATCT.
- MOA Measure 3: Prepare and provide educational information to the public regarding the existing ATCT in the form of an exhibit at a Fresno County Historical Society building and electronically provided education materials to the Fresno County Historical Society. The exhibit and materials will focus on the history and importance of the ATCT as an International style building designed by the prominent architect, Allen Y. Lew. The exhibit and materials will include narrative historic context and historic photographs.
- MOA Measure 4: Prepare a historic context for posting on the City website that discusses the development of the existing ATCT and the background and importance of the architect who designed the ATCT.

Significance with Mitigation

Implementation of Mitigation Measure CUL-1: Execution of a Memorandum of Agreement would minimize the loss of features of the existing ATCT under the Proposed Project by retaining a record of the demolished resource and providing an interpretive opportunity to the public to learn about the resource. However, the mitigation would not effectively reduce the impact associated with loss of historical resources to a less-than-significant level under CEQA. Thus, implementation of the Proposed Project would result in a ***significant and unavoidable impact*** on a historical resource as defined in Section 15064.5.

3.6.5.2 Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5

The Proposed Project would not cause a substantial adverse change in the significance of a known archeological resource pursuant to Section 15064.5 of the CEQA Guidelines because there are no known archeological resources within the project study area. However, there is potential for the Proposed Project to affect a previously unrecorded archaeological resource through ground-disturbing activities associated with the construction of the new ATCT and associated development and demolition. This may cause a substantial adverse in the

significance of an archaeological resource pursuant to Section 15064.5 and is considered to be a ***potentially significant impact***.

Mitigation Measure CUL-2: Inadvertent Discovery of Archaeological Resources

If previously unknown resources are discovered during construction, all earth-moving activity within and around the immediate discovery area will be halted until a qualified archaeologist assesses the nature and significance of the find. If there is ever any doubt or confusion upon discovery of cultural materials, the contractor supervisor and crew should temporarily halt work until the proper personnel can be notified and the situation clarified.

If the discovered resources are determined to be potentially eligible for listing in the CRHR, then they must be addressed under the procedures set forth in CEQA Guidelines Section 15064.5. If significant resources are encountered and avoidance is infeasible, then data recovery through excavation will be conducted. If the cultural materials are of Native American origin, the Airport will contact the NAHC and a data recovery plan will be prepared and implemented.

Significance with Mitigation

Implementation of Mitigation Measure CUL-2: Inadvertent Discovery of Archaeological Resources would reduce potential effects on unrecorded archaeological resources. Therefore, the Proposed Project's effects on archaeological resources would be ***less than significant with mitigation incorporated***.

3.6.5.3 Disturb any human remains, including those interred outside of formal cemeteries

The project study area has been previously developed or otherwise disturbed due to Airport development and operations. Therefore, it is unlikely that human remains would be encountered. However, there is always a possibility that ground-disturbing activities associated with future development may uncover previously unknown buried human remains. If human remains are identified during project construction, potential impacts related to disturbance of any human remains, including those interred outside of formal cemeteries, it would result in a ***potentially significant impact***.

Mitigation Measure CUL-3: Inadvertent Discovery of Human Remains

If human remains are discovered, Health and Safety Code Section 7050.5 requires that further disturbances and activities must cease in the vicinity of the discovery and the county coroner must be contacted. Pursuant to PRC Section 5097.98, if the remains are thought to be Native American, the coroner must notify the NAHC, who must then notify the Most Likely Descendent.

Significance with Mitigation

Implementation of Mitigation Measure CUL-3: Inadvertent Discovery of Human Remains would reduce potential impact associated with the disturbance of human remains. Therefore, the Proposed Project's effects on human remains would be ***less than significant with mitigation incorporated***.

3.6.5.4 Cause a substantial adverse change in the significance of a tribal resource

No known tribal cultural resources are present at the Airport. However, there is always potential for unknown resources to be discovered when performing ground-disturbing activities. If tribal

resources are identified during project construction, it may result in a substantial adverse change in the significance of those tribal resources. Therefore, it would be a ***potentially significant impact***.

Mitigation Measure CUL-4: Inadvertent Discovery of Tribal Resources

Refer to Mitigation Measure CUL-2: Inadvertent Discovery of Archaeological Resources in **Section 3.6.5.2**.

Significance with Mitigation

Nonetheless, with the implementation of Mitigation Measure CUL-4: Construction Monitoring and Treatment of Potential Finds (described above), the Proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource, and the impact would be ***less than significant with mitigation measures incorporated***.

3.7 Energy

This section describes the existing conditions, potential impacts and, where appropriate, proposed mitigation measures related to energy use from implementation of the Proposed Project.

3.7.1 Regulatory Setting

3.7.1.1 Federal

Energy Policy Act of 2005 and Energy Independence and Security Act of 2007

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under the Energy Policy Act, consumers and businesses can attain federal tax credits for purchasing fuel-efficient appliances and products. Because driving fuel-efficient vehicles and installing energy-efficient appliances can provide many benefits, such as lower energy bills, increased indoor comfort, and reduced air pollution, businesses are eligible for tax credits for buying hybrid vehicles, building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are given for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

The Energy Policy Act of 2005 also established the first renewable fuel volume mandate in the United States. The original Renewable Fuel Standard program required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the Energy Independence and Security Act of 2007, the Renewable Fuel Standard program was expanded to include diesel and to increase the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022. In December 2019, USEPA finalized volume requirements for cellulosic biofuel, biomass-based diesel, advanced biofuel, and total renewable fuel for 2020, and developed a requirement for biomass-based diesel for 2021. The rule became effective on April 6, 2020 (U.S. Environmental Protection Agency, 2020).

3.7.1.2 State

California Public Resources Code Section 21100(b)

California PRC Section 21100(b), directs all State agencies, boards, and commissions to assess the environmental impacts of projects for which they are a lead agency under CEQA to determine whether a project would result in significant effects on the environment, including effects from the wasteful, inefficient, and unnecessary consumption of energy, and to identify mitigation measures to minimize any such effects.

2023 Integrated Energy Policy Report Update

The 2023 Integrated Energy Policy Report (IEPR) Update provides an assessment of major energy trends and issues for a variety of energy sectors, as well as policy recommendations to address these concerns as required by Senate Bill (SB) 1389 (California Energy Commission, 2024b). Prepared by the California Energy Commission (CEC), this report details the key energy issues and develops potential strategies to address these issues. The 2023 IEPR Update includes a discussion of several strategies to reduce climate change impacts, speeding connection of clean resources to the electricity grid, the use of clean and renewable hydrogen,

and the California Energy Demand Forecast to 2040. The assessments and forecasted energy demand within the 2023 IEPR will be used by the CEC to develop future energy policies. CEC is developing the 2024 IEPR, which will continue to expand on efforts to decarbonize California's energy system and address topics such as wave and tidal energy and energy efficiency and demand. Public and agency comments on the Draft 2024 IEPR were due January 2025 (California Energy Commission, 2024b).

California Energy Efficiency Standards (Title 24, Part 6)

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in CCR Title 24, Part 6, were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods for building features such as space conditioning, water heating, lighting, and whole building envelope. The 2005, 2008, 2013 and 2019 updates to the efficiency standards included provisions such as cool roofs on commercial buildings, increased use of skylights, and higher efficiency lighting, heating, ventilation and air conditioning (HVAC), high performance attic and walls, and high efficiency air filters. The 2019 updates to the efficiency standards included indoor and outdoor lighting making maximum use of LED technology for nonresidential buildings. The 2022 updates encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards. Additionally, the 2022 standards introduced new requirements for low-rise multi-family buildings and includes the registration of new compliance documents. Overall, the 2022 amendments are expected to reduce electricity and fossil fuel natural gas usage when compared to continued compliance with the 2019 Energy Code requirements. Under the 2022 amendments, California buildings would consume approximately 198,600 GWh of electricity and 6.14 billion therms of fossil fuel natural gas in 2023 compared to approximately 199,500 GWh and 6.17 billion therms of electricity and fossil fuel natural gas, respectively, under the 2019 Energy Code (California Energy Commission, 2021). The current standards (2022 standards) became effective on January 1, 2023. Title 24, Part 6 is updated approximately every three years. The 2025 Energy Efficiency Standards will be effective in January 2026 (California Energy Commission, 2024a).

California Green Building Standards Code (CALGreen)

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as CALGreen. CALGreen is intended to encourage more sustainable and environmentally friendly building practices, require low-pollution emitting substances that cause less harm to the environment, conserve natural resources, and promote the use of energy-efficient materials and equipment. Since 2011, the CALGreen Code has been mandatory for all new residential and non-residential buildings constructed in the state. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. It requires new residential and non-residential construction to be pre-wired to facilitate the future installation and use of electric vehicle chargers. The CALGreen Code was most recently updated in 2022 to include new mandatory measures for residential and nonresidential uses; the new measures took effect on January 1, 2023 (California Building Standards Commission, 2024a).

Appliance Efficiency Regulations (Title 20)

The CEC adopted the Appliance Efficiency Regulations (CCR Title 20) in July 2015. The regulation set minimum energy efficiency standards for both federally regulated and non-federally regulated appliances and equipment. Standards include minimum levels of operating efficiency and other cost-effective measures to promote the use of energy and water efficient appliances.

California Climate Crisis Act

Enacted in 2022, AB 1279 codifies the 2045 carbon neutrality goal of Executive Order B-55-18 by declaring that it is the policy of the State to achieve net zero greenhouse gas (GHG) emissions no later than 2045, to achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. These targets amended those established in SB 32.

Senate Bill 100

Enacted in 2018, SB 100, or "The 100 Percent Clean Energy Act of 2018," increases the renewable energy and zero-carbon resources procurement target for retail electricity to 100 percent by 2045 (Leon, 2018). The bill also revises the goals established by SB 350 to increase the renewable energy resource procurement target for retail electricity from 50 percent to 60 percent by 2030 and further establishes incremental goals of 33 percent by 2020, 44 percent by 2024, and 52 percent by 2027. SB 100 further directs the State Energy Resources Conservation and Development Commission, the California Public Utilities Commission (CPUC), and CARB to incorporate the 2045 target into all relevant planning and report on implementation every four years beginning on January 1, 2021.

California Energy Efficiency Strategic Plan

In 2008, CPUC adopted the California Long-Term Energy Efficiency Strategic Plan. The plan lays out the long-term vision and goals for each economic sector and identifies near-term, mid-term, and long-term strategies to achieve those goals. The four specific programmatic goals are known as the *Big Bold Energy Efficiency Strategies*:

- All new residential construction will be zero net energy by 2020.
- All new commercial construction will be zero net energy by 2030.
- 50 percent of commercial buildings will be retrofitted to zero net energy by 2030.
- 50 percent of new major renovations of State buildings will be zero net energy by 2025.

3.7.1.3 Regional and Local

City of Fresno General Plan

The Resource and Conservation Element of the City of Fresno's General Plan provides policy guidance to reduce the consumption of non-renewable energy resources by requiring and encouraging conservation measures and the use of alternative energy sources (City of Fresno, 2014a). The following are the relevant policies related to energy:

- **Policy RC-4-c: Evaluate Impacts with Models.** Continue to require the use of computer models used by SJVAPCD to evaluate the air quality impacts of plans and projects that require such environmental review by the City.
- **Policy RC-8-a: Existing Standards and Programs.** Continue existing beneficial energy conservation programs, including adhering to the California Energy Code in new construction and major renovations.
- **Policy RC-8-b: Energy Reduction Targets.** Strive to reduce per capita residential electricity use to 1,800 kWh per year and non-residential electricity use to 2,700 kWh per year per capita by developing and implementing incentives, design and operation standards, promoting alternative energy sources, and cost-effective savings.
- **Policy RC-8-c: Energy Conservation in New Development.** Consider providing an incentive program for new buildings that exceed California Energy Code requirements by fifteen percent.
- **Policy RC-8-f: City Heating and Cooling.** Reduce energy use at City facilities by updating heating and cooling equipment and installing "smart lighting" where feasible and economically viable.

City of Fresno Municipal Code

Chapter 11, Article 1 of the City of Fresno Municipal Code discusses guidelines pertaining to building permits and regulations. Section 11-108 adopts the California Energy Code as the Fresno Energy Code.

3.7.2 Significance Thresholds

Significant impacts related to energy resources would occur if the implementation of the Proposed Project results in the following:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.7.3 Methodology

The energy analysis is based on projected demand associated with electricity, natural gas, and fuel use, as well as an evaluation of the project components relative to energy conservation through the wise and efficient use of energy, as identified in Appendix F of the CEQA Guidelines.

The methodology for estimating construction equipment usage and worker, vendor, and haul trips is provided in **Section 3.4, Air Quality**. Fuel usage was derived from the estimated construction GHG emissions discussed and analyzed in **Section 3.9, Greenhouse Gas Emissions**. Fuel consumption was estimated by converting the carbon dioxide equivalent (CO_2e) emissions from diesel fuel consumption for each phase of construction to gallons using

established conversion factors for CO_2e to gallons of diesel fuel.[11] The conversion factors used for gasoline was 112.52 gallons of gasoline per metric ton of CO_2e and the conversion factor used for diesel was 98.23 gallons of diesel per metric ton of CO_2e.

3.7.4 Existing Conditions / Environmental Setting

Pacific Gas & Electric Company (PG&E) is the power and natural gas provider to FAT facilities. PG&E obtains its energy supplies from power plants and natural gas fields in Northern California as well as from electricity and natural gas purchased outside its service area and delivered through high-voltage transmission lines of the power grid and gas pipelines. Of the 2023 electric power mix delivered to retail customers, PG&E reported 36.9 percent of electricity was generated by eligible renewables (i.e., biomass and biowaste, geothermal, hydroelectric, solar, and wind), 36.6 percent by natural gas-fired power plants, 11.7 percent by large hydroelectric power plants, 9.3 percent by nuclear power plants, and 1.8 percent by coal power plants (PG&E, 2024). In conjunction with PG&E, the Airport also owns and operates a 4.2-megawatt solar farm which offsets the cost of electricity purchased from the local utility company, PG&E.

Transportation Fuels Supply and Consumption

Most petroleum fuel refined in California is for use in on-road motor vehicles and is refined within California to meet State-specific formulations required by CARB. The major categories of petroleum fuels are gasoline and diesel (for passenger vehicles, transit vehicles, rail, and aircraft) and fuel oil (for industry and emergency electrical power generation). Other liquid fuels include kerosene, jet fuel, and residual fuel oil for marine vessels.

Transportation fuel sources also include electricity. Conventional gasoline and diesel vehicles consume gasoline or diesel fuel, whereas electric vehicles consume electricity that can be sourced by fossil fuels or renewables. Electric vehicles (EVs), including battery-electric vehicles and plug-in hybrid electric vehicles, comprise a growing fraction of the passenger vehicles on the roads in California, and EV adoption is expected to increase over the upcoming decades due in part to improvements in battery technology and public initiatives and goals.

Other transportation fuel sources are alternative fuels, such as methanol and denatured ethanol (alcohol mixtures that contain no less than 70 percent alcohol), natural gas (compressed or liquefied), liquefied petroleum gas (LPG), hydrogen, and fuels derived from biological materials (i.e., biomass). Gasoline and diesel fuel are by far the largest transportation fuels used by volume in Fresno County. The total estimated 2023 retail gasoline sales in California was 13,576 million gallons. Of this total, 372 million gallons were Fresno County retail gasoline sales. The total estimated 2023 retail diesel fuel sales in California was 2,316 million gallons. Of this total, Fresno County had 81 million gallons in sales. For diesel fuel, 36.4 percent of all sales are comprised by non-retail sales, which are not accounted for in the totals mentioned above (California Energy Commission, 2025).

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[11] Conversion data from: U.S. Environmental Protection Agency (EPA). *Greenhouse Gases Equivalencies Calculator - Calculations and References*. Retrieved November 2024, from: www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references.

3.7.5 Environmental Impacts and Mitigation

3.7.5.1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation

Construction of the Proposed Project would require the use of transportation fuel, including gasoline and diesel use in construction equipment, material transport via hauling trucks, and construction worker vehicles. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, while vehicle miles traveled (VMT) associated with the transportation of construction materials and construction worker commutes would also result in fuel consumption. Construction workers would travel to and from the project site throughout the duration of construction.

The Proposed Project would be constructed in four stages over a two-year period. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers and vendors traveling to and from the project study area. Electricity would be used during construction to provide temporary power for lighting, electronic equipment, and certain construction equipment. Certain heavy-duty construction equipment could be electric or alternatively fueled based on commercial availability, such as tower cranes. The Proposed Project would use electric or alternatively fueled equipment, as available and feasible. Electricity use during construction would be variable depending on lighting needs and the use of electric powered equipment and would only occur for the duration of construction activities. Construction of the Proposed Project would comply with all applicable federal, State, and local energy regulations identified in **Section 3.4.1 and 3.7.1** that minimize the use of energy resources. These regulations include that construction equipment is required to comply with the latest USEPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. SJVAPCD Regulations VIII Rules 8011-8081 include regulations to reduce PM_{10} emissions during construction and demolition activities. As such, construction-related electricity use would generally be considered temporary and negligible over the long term. Therefore, construction of the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of electricity.

The Proposed Project would be constructed in compliance with Title 24, Chapter 6, including the use of energy efficient modern building materials and construction practices. The Proposed Project would also use new modern appliances and equipment, in accordance with the CCR Title 20. In addition, the Proposed Project would comply with federal, State, and local energy efficiency policies and would operate more energy efficiently than the existing outdated ATCT. The existing ATCT would be demolished following the completion of the new ATCT, so it would no longer consume energy. Additionally, because the Proposed Project would replace an existing facility, as discussed in **Section 3.18.5**, there would be no change to operational VMT that would result in additional use of fuel. Therefore, the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation, and the Proposed Project would have a ***less than significant impact***.

3.7.5.2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

The Proposed Project would be required to comply with the CALGreen Code (CCR Title 24, Part 11) and the California Energy Code (CCR Title 24, Part 6), which includes provisions related to insulation and design aimed at minimizing energy consumption, as discussed above in **Section 3.7.5.1**. Additionally, the Proposed Project would comply with the City's General Plan objectives and policies that aim to reduce energy consumption. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. There would be ***no impact***.

3.8 Geology and Soils

This section describes existing geological and soil conditions and associated potential geologic, seismic, and geotechnical hazards as a basis for the discussion of potential impacts and proposed mitigation measures for the Proposed Project at FAT.

3.8.1 Regulatory Setting

3.8.1.1 Federal

Earthquake Hazards Reduction Act of 1977

The Earthquake Hazards Reduction Act of 1977 was enacted to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." The National Earthquake Hazards Reduction Program (NEHRP) was established by the U.S. Congress when it passed the Earthquake Hazards Reduction Act of 1977 (Public Law 95–124).

NEHRP's mission includes:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.
- Multiple programs under NEHRP help inform and guide planning and building code requirements, such as emergency evacuation responsibilities and seismic code standards.

3.8.1.2 State

Alquist-Priolo Special Earthquake Fault Zoning Act (Alquist-Priolo Act)

The Alquist-Priolo Earthquake Fault Zoning Act, passed in 1972, requires the establishment of earthquake fault zones along known active faults in California. The Alquist-Priolo Act prohibits the location of structures designed for human occupancy across the traces of active faults. The State guidelines for fault rupture hazards are explained in the California Geological Survey (CGS) Special Publication 42 (California Geological Survey, 2018).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6) directed the CGS to identify and map areas prone to earthquake hazards of liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to reduce the threat to public safety and to minimize the loss of life and property by identifying and mitigating these seismic hazards. The SHMA requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps).

California Building Code

The California Building Code (CBC) (Title 24 California Code of Regulations Part 2) provides minimum standards for building design in the state. The CBC, published July 1, 2022, with an effective date of January 1, 2023, is based on the 2021 International Building Code (California Building Standards Commission, 2024b). Each jurisdiction in California may adopt its own building code based on the CBC, which is permitted to be more stringent than the CBC, but at a minimum is required to meet all State standards and enforce the regulations of the CBC.

The CBC, in conjunction with American Society of Civil Engineers (ASCE) Minimum Design Loads and Associated Criteria for Buildings and Other Structures (ASCE 7 22) (American Society of Civil Engineers, 2022), establishes minimum design criteria and construction requirements including design of concrete and steel structures, buildings, excavation and shoring, grading, and foundations.

3.8.1.3 Regional and Local

City of Fresno General Plan

The Noise and Safety Element of the City of Fresno's General Plan include the following relevant policies pertain to geology and soils for the Proposed Project:

- **Policy NS-2-a: Seismic Protection.** Ensure seismic protection is incorporated into new and existing construction, consistent with the Fresno Municipal Code.
- **NS-2-b. Policy: Soil Analysis Requirement.** Identify areas with potential geologic and/or soils hazards, and require development in these areas to conduct a soil analysis and mitigation plan by a registered civil engineer (or engineering geologist specializing in soil geology) prior to allowing on-site drainage or disposal for wastewater, stormwater runoff, or swimming pool/spa water.

City of Fresno Municipal Code

Section 11-101 of the City of Fresno Municipal Code adopts the CBC as the Fresno Building Code.

3.8.2 Significance Thresholds

Significant impacts related to geology and soils would occur if the implementation of the Proposed Project would result in the following:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

   ii. Strong seismic ground shaking.

   iii. Seismic-related ground failure, including liquefaction.

   iv. Landslides.

b) Result in substantial soil erosion or the loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.8.3 Methodology

The evaluation of potential hazards related to geology and soils was based on review and analysis of the data and information presented in existing geotechnical reports along with published reports and maps from USGS and the California Department of Conservation.

3.8.4 Existing Conditions / Environmental Setting

3.8.4.1 Geology

The city of Fresno is located within the San Joaquin Valley, bordered by the Sacramento Valley to the north, the Sierra Nevada to the east, the Coast Ranges to the west, and the Transverse Ranges to the south. Deposits within the San Joaquin Valley include both marine and continental rocks and deposits that range from Jurassic to Holocene. These fan deposits are primarily granitic gravels, sands, and silts of the Modesto Formation that were carried by rivers and streams emerging from the highlands that surround the Great Valley (Page & LeBlanc, 1969).

The Great Valley is an alluvial plain about 50 miles wide and 400 miles long in the central part of California. The project study area is within the eastern portion of the Great Valley geomorphic province which is characterized by low-lying ridges and valleys and is relatively flat. The topographic elevations at the Airport are consistent with its surroundings with only a five-foot change in elevation from its eastern boundary to its western boundary.

3.8.4.2 Faulting and Seismicity

Fault ruptures are generally expected to occur along active fault traces that have exhibited signs of recent geological movement (i.e., in the last 11,000 years). Alquist-Priolo Earthquake Fault Zones delineate areas around active faults with potential surface fault rupture hazards that would require specific geological investigations prior to approval of certain kinds of development within the delineated area.

The project study area is located along the eastern edge of the San Joaquin Valley in a seismically inactive region and is not located within an Alquist-Priolo Earthquake Fault Zone. In addition, no known active or potentially active faults or fault traces are located in the Airport vicinity. The closest fault line to the project study area is the Clovis Fault, located about 8 miles

northeast of the Airport (California Department of Conservation, 2024). However, the Clovis Fault was last active pre–Quaternary Period (over 2 million years ago), and there has been no historical evidence of recent age activity from this fault. The nearest active faults are the Nunez Fault, located approximately 60 miles southwest of the project study area, and Independence Fault, located approximately 80 miles east of the study area.

3.8.4.3 Liquefaction and Related Geologic Hazards

Liquefaction is a process whereby strong ground shaking causes loose, saturated, unconsolidated sediments to lose strength and to behave as a fluid. This process can cause significant ground deformations at or near the ground surface, including lateral spreading, differential compaction, or settlement and sand boils. The amounts of settlement and movement depend on ground shaking intensity and degree of soil compaction; looser soils subjected to higher ground shaking will settle or move more. Loss of bearing strength and ground movements associated with liquefaction may result in damage to structures.

The predominant soils within the city of Fresno consist of varying combinations of loose/very soft to very dense/hard silts, clays, sands, and gravels. Groundwater has been encountered near the ground surface in close proximity to water-filled features such as canals, ditches, ponds, and lakes. Based on these characteristics, the potential for soil liquefaction within the city ranges from very low to moderate due to the variable density of the subsurface soils and the presence of shallow groundwater. In addition to liquefaction, locations throughout the city could be susceptible to induced settlement of loose unconsolidated soils or lateral spread during seismic shaking events. Because of the nature of the subsurface materials and the relatively low to moderate seismicity of the region, seismic settlement and/or lateral spread are not anticipated to represent a substantial hazard within the city during seismic events.

3.8.4.4 Landslides

A landslide is a mass of rock, soil, and/or debris that has been displaced downslope by sliding, flowing, or falling. Landslides occur when shear stresses within a soil or rock mass exceed the available shear strength of the mass. Failure may occur when stresses acting on a slope increase, the internal strength of the slope mass decreases, or a combination of both.

Strong earthquakes often cause landslides, particularly in areas already susceptible to landslides due to other factors, including the presence of existing landslide deposits. Landslides are typically a major effect of ground shaking during earthquakes with magnitudes of 5 and greater, especially where earth materials are water saturated. Failure of steep slopes, collapse of natural stream banks, and reactivation of existing landslides may occur during a major earthquake. Fresno is located within an area that consists of mostly flat topography within the Central Valley. Accordingly, there is no risk of large landslides in the majority of the city. However, there is the potential for landslides and slumping along the steep banks of rivers, creeks, or drainage basins such as the San Joaquin River bluff and the many unlined basins and canals that trend throughout the city. The project study area is in a flat area, and it is not in the vicinity of the San Joaquin River bluff or along a steep bank of any unlined basins or canals.

3.8.4.5 Expansive Soils

Expansive soils exhibit a “shrink well” behavior. Shrink well is the cyclic change in volume (expansion and contraction) that occurs in fine-grained soils from the process of wetting and drying. Expansive soils may cause differential and cyclical soil movement that can cause

damage and/ or distress to overlying structures and equipment. However, expansive soil issues can be overcome by adhering to appropriate engineering designs and construction techniques.

According to the USDA, the project study area consists of Atwater sandy loam, 0 to 3 percent slopes, which was formed in granitic alluvium and are considered very deep, well drained soils (U.S. Department of Agriculture, 2024). Atwater sandy loam has low expansion potential.

3.8.4.6 Subsidence and Erosion

Subsidence involves either the sudden collapse of the ground to form a depression or the slow subsidence or compaction of the sediments near the ground surface. The most common type of sudden collapse is due to erosion of underground soil or rock caused by leaking human-made sewer pipes or water mains.

According to the City of Fresno General Plan Noise and Safety Element, land along the San Joaquin River bluffs are predisposed to instability and erosion due to its steep slopes and soil composition; however, land beyond 300 feet of the toe of the river bluffs are not overly susceptible to soil erosion (City of Fresno, 2014a). The project study area is located about 7.25-miles southeast of the San Joaquin River bluffs.

3.8.5 Environmental Impacts and Mitigation

3.8.5.1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42

Fault ruptures are generally expected to occur along active fault traces that have exhibited signs of recent geological movement (i.e., in the last 11,000 years). Alquist-Priolo Earthquake Fault Zones delineate areas around active faults with potential surface fault rupture hazards that would require specific geological investigations prior to approval of certain kinds of development within the delineated area. The project study area is not located within an Alquist-Priolo Earthquake Fault Zone. In addition, no known active or potentially active faults or fault traces are located in the Airport vicinity. The nearest active faults are the Nunez Fault, located approximately 60 miles southwest of the project study area, and Independence Fault, located approximately 80 miles east of the project study area (California Department of Conservation, 2024). The Proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. There would be ***no impact***.

Strong seismic ground shaking

The city of Fresno is located in an area with historically low to moderate level of seismicity. However, strong ground shaking could occur within the project study area during seismic events and occurrences and have the possibility to result in significant impacts. Major seismic activity along the Great Valley Fault Zone or the Nunez Fault, or other associated faults, could affect the

project study area through strong seismic ground shaking. Strong seismic ground shaking could potentially cause structural damage to the Proposed Project. However, due to the distance to the known faults, hazards due to ground shaking would be minimal. In addition, compliance with the CBC (CFR Title 24) would ensure that the geotechnical design of the Proposed Project would further reduce potential impacts related to seismic ground shaking. Therefore, the Proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and the impact would be ***less than significant***.

Seismic-related ground failure, including liquefaction

The primary potential earthquake hazard in Fresno is ground shaking, which could cause damage to infrastructure and buildings. Due to the nature of the subsurface materials and the relatively low to moderate seismicity of the region, potential for seismic-related ground failure is low in Fresno. The project study area is not within an identified liquefaction zone (California Department of Conservation, 2024). Additionally, required compliance with the CBC, the City of Fresno Municipal Code, and the General Plan would ensure that impact associated with seismic-related ground failure would be ***less than significant***.

Landslides

A landslide generally occurs on relatively steep slopes and/or on slopes underlain by weak materials. The city of Fresno is located within an area that consists of mostly flat topography within the Central Valley. Accordingly, there is no risk of large landslides in the majority of the city. However, there is the potential for landslides and slumping along the steep banks of rivers, creeks, or drainage basins such as the San Joaquin River bluff and the many unlined basins and canals that trend throughout the city. The project study area is in a flat area and it is not in the vicinity of the San Joaquin River bluff or along a steep bank of any unlined basins or canals. Therefore, the potential for the Proposed Project to expose people or structures to risk as a result of landslides would be minimal and there would be ***no impact***.

3.8.5.2 Result in substantial soil erosion or the loss of topsoil

Grading and earthmoving during project construction have the potential to result in erosion and loss of topsoil. Exposed soils could be entrained in stormwater runoff and transported off the project study area. However, through compliance with water quality control measures, which include preparation of a Stormwater Pollution Prevention Plan (SWPPP), these effects would be minimized. Although designed primarily to protect stormwater quality, the SWPPP would incorporate best management practices (BMPs) to minimize erosion. The impact would be ***less than significant***.

3.8.5.3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse

Due to minimal slopes and the type of soils within the project study area, the potential for liquefaction, lateral spreading, or landslides would be minimal. Additionally, the Proposed Project would be required to adhere to the CBC, which would further reduce risks related to unstable soils. Therefore, the impact related to unstable is ***less than significant***.

3.8.5.4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property

The project study area is located within an area that contains Atwater sandy loam, which has low expansion potential. To reduce potential impacts related to expansive soils, construction of the Proposed Project would comply with requirements of the CBC, the City of Fresno Municipal Code, and the General Plan. Therefore, the impact would be ***less than significant***.

3.8.5.5 Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water

The new ATCT would be served by a wastewater conveyance system maintained by the Wastewater Management Division (WMD) of the City of Fresno. Wastewater from the City's collection system is treated at the Fresno/Clovis Regional Wastewater Reclamation Facility. Development of the Proposed Project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the Proposed Project would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. There would be ***no impact***.

3.8.5.6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Although there are no known unique paleontological resources, sites, or geologic features within the project study area, construction of the Proposed Project may affect an unknown paleontological resource or site or unique geologic feature during ground disturbing activities. Therefore, the impact is ***potentially significant*** and the following mitigation measure would be implemented.

Mitigation Measure GEO-1: Unanticipated Discovery of Paleontological Resources

Subsequent to a preliminary City review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for unique paleontological/geological resources shall be conducted. The following procedures shall be followed:

- If unique paleontological/geological resources are not found during either the field survey or literature search excavation and/or construction activities can commence. In the event that unique paleontological/geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological resources

recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

- If unique paleontological/geological resources are found during the field survey or literature review, the resources shall be inventoried and evaluated for significance. If the resources are found to be significant, mitigation measures shall be identified by the qualified paleontologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include a paleontological monitor. The monitoring period shall be determined by the qualified paleontologist. If additional paleontological/geological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.

Significance with Mitigation

With implementation of Mitigation Measure GEO-1, the potential effect on paleontological or geological resources would minimized to ***less than significant with mitigation incorporated***.

3.9 Greenhouse Gas Emissions

This section analyzes existing and future GHG emissions resulting from implementation of the Proposed Project.

3.9.1 Regulatory Setting

3.9.1.1 Federal

U.S. Environmental Protection Agency

The USEPA is responsible for implementing federal policies to address GHGs. These policies focus on energy efficiency, renewable energy, methane and other non-carbon dioxide gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the Energy Star labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and major industrial sectors.

Inflation Reduction Act of 2022

The Inflation Reduction Act of 2022 (IRA), signed into law on August 16, 2022, directs new federal spending toward reducing carbon emissions, lowering healthcare costs, funding the Internal Revenue Service, and improving taxpayer compliance. The act aims to catalyze investments in domestic manufacturing capacity, encourage procurement of critical supplies domestically or from free-trade partners, and jump-start research and development and commercialization of leading-edge technologies such as carbon capture and storage and clean hydrogen.

3.9.1.2 State

California Climate Crisis Act

Refer to **Section 3.7, Energy** for a discussion on the California Climate Crisis Act (AB 1279).

California Global Warming Solutions Act

The California Global Warming Solutions Act of 2006 was passed under AB 32 for the purpose of adapting California to climate change and combatting the risks associated with the adverse effects of global warming. This is the first program in the nation to consider both environment and the economic growth while taking a long-term approach addressing climate change. AB 32 is enforced by CARB and requires CARB to develop a scoping plan to strategize how California will meet its goals, which include reducing California's GHG emissions to 1990 levels by 2020 (California Air Resources Board, 2024b).

CARB 2022 Scoping Plan

As required by AB 32, CARB developed a scoping plan to detail the approach that California will take to reduce GHG emissions in the state. The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) was adopted on December 12, 2022, and sets the path for the State to achieve carbon neutrality and an 85 percent reduction in anthropogenic GHG emissions by 2045, in accordance with AB 1279 (California Air Resources Board, 2022).

Sustainable Communities and Climate Protection Act

The Sustainable Communities and Climate Protection Act of 2008 (SB 375) directs CARB to set regional targets to reduce GHG emissions. This act directs each of the State's metropolitan planning organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) as part of its regional transportation plan (RTP) that contains land use, housing, and transportation strategies that enables the region to meet its GHG emission reduction targets. The Fresno Council of Governments (COG) is the metropolitan planning agency tasked with developing the SCS, as required under SB 375.

Clean Energy, Jobs and Affordability Act of 2022

SB 1020 enacted the Clean Energy, Jobs and Affordability Act of 2022, which amends Section 454.53 of the Public Utilities Code to provide that "eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all State agencies by December 31, 2035."

Cap-and-Trade Program

Enabled by AB 32, CARB adopted cap-and-trade regulation (CCR Title 17, Subchapter 10, Article 5). The program covers about 450 emitters in the electric and industrial sectors who produce more than 25,000 metric tons of carbon dioxide equivalents ($mtCO_2e$). Together they are responsible for 85 percent of the state's emissions. Entities that emit more than 10,000 $mtCO_2e$ are required to report their emissions to CARB.

The program imposes a "cap" on the total GHG emissions from covered entities in the state, and the quantity of emissions allowed under the cap decreases each year.

To encourage emission sources to emit less as the cap decreases, "allowances," or permission to emit GHGs, are made available in decreasing quantities. The intent is to make reducing GHG emissions more financially attractive as the number of available allowances decreases, making each allowance more costly.

High Global Warming Potential Refrigerant Emissions Reduction

In 2020, CARB announced its intent to reduce the impact of high-global warming potential (high-GWP) refrigerants, including all ozone-depleting substances and any refrigerant with a GWP of 150 or higher. GWP is a measure of how destructive a climate pollutant is. The refrigerants, known as hydrofluorocarbons (HFCs), are considered to be super pollutants because they trap heat in the atmosphere thousands of times more effectively than carbon dioxide, the most prevalent greenhouse gas. The rules affect commercial and industrial, stationary refrigeration units, such as those used by large grocery stores, as well as commercial and residential air conditioning units. This equipment often leaks refrigerants over time. In other cases, emissions are released when the equipment is dismantled and destroyed at the end of its useful life. The regulations are intended to help California reach the requirement to reduce HFC emissions 40 percent below 2013 levels by 2030 under SB 1383.

Community Air Protection Blueprint

In 2017, Governor Brown signed AB 617 to develop a new community focused program to more effectively reduce exposure to air pollution and preserve public health. This bill directs CARB and all local air districts, including SJVAPCD, to take measures to protect communities disproportionately affected by air pollution. With input from communities and air districts throughout the state, CARB developed a Community Air Protection Blueprint to implement AB 617.

Approved in October 2023, the Community Air Protection Program Blueprint 2.0 (Blueprint 2.0) is CARB's statewide strategy and implementation guidance to reduce harmful emissions and exposures to air pollution in communities most impacted by poor air quality.

California Green Building Standards (CALGreen)

Refer to **Section 3.7, Energy** for a discussion on CALGreen.

California Energy Efficiency Standards (Title 24, Part 6)

Refer to **Section 3.7, Energy** for a discussion on California Energy Efficiency Standards.

Assembly Bill 341 – Mandatory Commercial Recycling

AB 341 became effective on July 1, 2012, and requires all businesses or public entities that generate four or more cubic yards of solid waste a week to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand opportunities for additional recycling services and recycling manufacturing facilities in California to be established.

3.9.1.3 Regional and Local

San Joaquin Valley Air Pollution Control District

SJVAPCD has jurisdiction over certain air quality matters in the SJVAB, which includes the following counties: Fresno, Kings, Tulare, Madera, Stanislaus, San Joaquin, Merced, and the valley portion of Kern County. While CARB is responsible for preparing the State's air quality control plan, also known as the SIP, and developing State air quality standards, SJVAPCD is responsible for preparing attainment plans for each nonattainment criteria air pollutant which does not meet the State standards (San Joaquin Valley Air Pollution Control District, 2024b).

Climate Change Action Plan –SJVAPCD adopted the Climate Change Action Plan (CCAP) in 2008 to provide guidance to lead agencies and participating parties in assessing and reducing greenhouse gas emissions related to a project (San Joaquin Valley Air Pollution Control District, 2009). The guidance also allows lead agencies to establish their own process and guidance for determining the significance of a project's global climate change impacts. In addition, CCAP also develops methods to mitigate GHG emissions, such as establishing best performance standards and how to develop those and providing a carbon exchange program (Rule 2301).

2022 Regional Transportation Plan Sustainable Communities Strategy

As previously mentioned, Fresno COG is the metropolitan planning agency tasked with developing the SCS, as required under SB 375. Fresno COG developed a SCS that focuses on inward growth in combination with transit and active transportation investments to reduce the

GHG emissions from development. The SCS encourages the County and the cities within its jurisdiction to focus on more infill development and multi-family housing, and to place more emphasis on transit, bicycle and pedestrian infrastructure development.

City of Fresno General Plan

The Resource Conservation and Resilience Element of the City of Fresno General Plan includes the following relevant objectives and policies related to GHG emissions for the Proposed Project (City of Fresno, 2014a):

- **Policy RC-5-a: Support State Goal to Reduce Statewide GHG Emissions.** As is consistent with State law, strive to meet AB 32 goal to reduce greenhouse gas emissions to 1990 levels by 2020 and strive to meet a reduction of 80 percent below 1990 levels by 2050 as stated in Executive Order S-03-05. As new statewide GHG reduction targets and dates are set by the State update the City's Greenhouse Gas Reduction Plan to include a comprehensive strategy to achieve consistency with those targets by the dates established.
- **Policy RC-5-c: GHG Reduction through Design and Operations.** Increase efforts to incorporate requirements for GHG emission reductions in land use entitlement decisions, facility design, and operational measures subject to City regulation through the following measures and strategies:
    - Promote the expansion of incentive-based programs that involve certification of projects for energy and water efficiency and resiliency. These certification programs and scoring systems may include public agency "Green" and conservation criteria, Energy Star™ certification, CALGreen Tier 1 or Tier 2, Leadership in Energy Efficient Design (LEED™) certification, etc.
    - Promote appropriate energy and water conservation standards and facilitate mixed-use projects, new incentives for infill development, and the incorporation of mass transit, bicycle and pedestrian amenities into public and private projects.
    - Require energy and water audits and upgrades for water conservation, energy efficiency, and mass transit, pedestrian, and bicycle amenities at the time of renovation, change in use, change in occupancy, and change in ownership for major projects meeting review thresholds specified in an implementing ordinance.
    - Incorporate the City's "Guidelines for Ponding Basin/Pond Construction and Management to Control Mosquito Breeding" as conditions of approval for any project using an on-site stormwater basin to prevent possible increases in vector-borne illnesses associated with global climate change.
    - Periodically evaluate the City's facility maintenance practices to determine whether there are additional opportunities to reduce.
- **Policy RC-5-d: SCS and CAP Conformity Analysis.** Ensure that the City includes analysis of a project's conformity to an adopted regional Sustainable Community Strategy or Alternative Planning Strategy (APS), an adopted Climate Action Plan (CAP),

and any other applicable City and regional greenhouse gas reduction strategies in affect at the time of project review.

- **Policy RC-5-e: Ensure Compliance.** Ensure ongoing compliance with GHG emissions reduction plans and programs by requiring that air quality measures are incorporated into projects' design, conditions of approval, and mitigation measures.
- **Policy RC-5-f: Toolkit.** Provide residents and project applicants with a "toolkit" of generally feasible measures that can be used to reduce GHG emissions, including educational materials on energy-efficient and "climate-friendly" products.
- **Policy RC-5-g: Evaluate Impacts with Models.** Continue to use computer models such as those used by SJVAPCD to evaluate greenhouse gas impacts of plans and projects that require such review.

3.9.2 Significance Thresholds

Significant impacts related to GHG emissions would occur if implementation of the Proposed Project would result in any of the following:

a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

State CEQA Guidelines Section 15064.4(a) recognizes that the "determination of the significance calls for a careful judgment" by the lead agency that is coupled with lead agency discretion to determine whether to (1) quantify GHG emissions resulting from a project,[12] and/or (2) rely on a qualitative analysis or performance-based thresholds. Section 15064.4(b) states that a lead agency should focus analysis on the incremental contribution of a project's emissions to climate change, and that a project's incremental contribution may be cumulatively considerable even if it appears negligible compared to statewide, national, or global emissions. Section 15064.4(b) further states that a lead agency should consider the following, non-exclusive list of factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. The extent to which project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies

[12] Section 15064.4(c) states that a lead agency may use a model or methodology of its discretion to estimate greenhouse gas emissions resulting from a project. The selection of the model or methodology must be supported with substantial evidence.

address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

In addition to evaluation of a project's impacts against a quantifiable significant threshold, per CEQA Guidelines Section 15064(h)(3), a project's contribution to a cumulatively considerable impact would not be substantial if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially reduce the cumulative impact within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Therefore, State CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with programs and/or other regulatory schemes to reduce GHG emissions.

The City has quantified the Proposed Project's GHG emissions to evaluate construction impacts and quantifiably compare existing conditions to future conditions following project implementation.

3.9.3 Methodology

GHG emissions associated with construction and operation of the Proposed Project were estimated using the CalEEMod (Version 2022.1.1.9). This software quantifies emissions sources associated with various construction phases (e.g., demolition, site preparation, grading, building construction). The analysis included estimating emission quantities in metric tons for each of the three primary GHGs: carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). CO_2e was calculated by multiplying the metric tons of a GHG by its associated global warming potential (GWP).

Existing operational GHG emissions and future operational GHG emissions would be generated from the following sources:

- Mobile sources: project-generated vehicle trips to and from the Proposed Project
- Area sources: associated with activities such as landscaping and maintenance on the project site
- Indirect emissions from sources associated with energy consumption, waste sources, and water sources.
    - Energy source emissions would be generated at offsite utility providers from electricity demand generated by the Proposed Project. Waste source emissions generated by the Proposed Project include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. Water source emissions associated with the Proposed Project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

To determine consistency with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHGs, the components of the Proposed Project and the results of

the GHG emissions calculations were evaluated for conformance to applicable plans, policies, and regulations identified in the Regulatory Setting.

3.9.4 Existing Conditions / Environmental Setting

3.9.4.1 Existing Greenhouse Gas Emissions

Existing greenhouse gas emissions within the project study area are predominantly from stationary sources associated with the operation of the existing ATCT.

Existing operational GHG emissions were estimated using CalEEMod and are presented in **Table 3-7**.

Table 3-7: Estimated Operational Greenhouse Gas Emissions from the Existing ATCT (Metric tons per year)

Source	CO_2	CH_4	N_2O	CO_2e
Existing ATCT/a/	1,729	1.62	0.12	1,808

/a/ CalEEMod estimates operational emissions based on the year that the facility became fully operational. However, CalEEMod only provides estimates from 2010 on, so that was the year selected as the year the existing ATCT facility became operational. Because the existing ATCT facility became operational in 1961, the emissions are potentially higher than what is presented, so this table provides a conservative baseline to compare future operational pollutant emissions.

Source: CalEEMod, 2025; RS&H, 2025

3.9.5 Environmental Impacts and Mitigation

3.9.5.1 Effects of Global Climate Change

GHGs are certain gases in the earth's atmosphere that play a critical role in influencing global temperature and amplifying the earth's greenhouse effect. As solar radiation enters earth's atmosphere from space, a small of its radiation is reflected back into space while the majority is absorbed by the earth's surface. As earth's surface absorbs the sun's radiation and gets heated, the surface radiates part of this energy back into the atmosphere as infrared radiation. Different from light energy, infrared radiation tends to be absorbed by GHGs in the earth's atmosphere, which would heat the atmosphere and radiate infrared radiation back toward earth's surface.

Increasing concentration levels of GHGs in the atmosphere affect global climate change. The scientific community's understanding of the fundamental processes for global climate change has improved over the past decades, and its predictive capabilities continue to advance. According to the California Climate Adaption Strategy, the potential impacts in California due to global climate change may include the following: loss in snow pack, sea level rise, more extreme-heat days per year, more high ozone das, more large forest fires, more drought years, more extreme precipitation events, increase ocean acidification, increase erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems, increased pest infestation, and decline in human health and well-being (State of California, 2024).

3.9.5.2 Existing Airport Sustainability Measures

In 2009, FAT was selected by the FAA as one of the ten airports nationwide to participate in a pilot program for airport sustainability programming. In 2012, the City published an Airport-specific sustainability management plan which provides a strategic framework for reducing GHG emissions and adapting to impacts of climate change. The sustainability management plan was also developed to support the City of Fresno's goal of becoming a sustainable city by 2025.

FAT installed a 4.2-million-kilowatt solar plant in 2009 that provides for most of the electricity consumed by the Airport. Not only does the solar power plant provide FAT with less expensive power, but it also allows the Airport to source its electric utility from a sustainable source rather than a source that requires the burning of fossil fuels and generation of GHGs.

3.9.5.3 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment

Construction

GHG emissions associated with construction of the Proposed Project were estimated for on-road and off-road vehicles and equipment through CalEEMod (see **Appendix B**). The results of the analysis from CalEEMod associated with GHG emissions for construction activities from 2027 to 2028 are presented in **Table 3-8**. As shown, CalEEMod estimates at most about 375 $mtCO_2e$ per year. The Proposed Project would comply with the conditions set in the Airport's Sustainability Management Plan and the California Green Building Standards Code and implement BMPs for construction-related GHG emissions as recommended by SJVAPCD for indirect sources as well as the emissions control measures identified in **Section 3.4.5.1**, which would reduce the amount of GHG emissions from construction. Therefore, the impact would be ***less than significant***.

Table 3-8: Proposed Project Construction-Related Greenhouse Gas Emissions (Metric tons per year)

Year	CO_2	CH_4	N_2O	CO_2e
2027	371	0.01	0.01	375
2028	178	0.01	<0.005	179

Source: CalEEMod, 2025; RS&H, 2025

Operation

The existing ATCT would be demolished following completion of the new ATCT. The new ATCT would use updated building equipment and materials that would be more energy efficient than the existing, outdated ATCT.

Table 3-9 presents the estimated operational GHG emissions of the new ATCT at opening year (2028) and the net change between the estimated existing operational GHG emissions and future operational GHG emissions with implementation of the Proposed Project.

Table 3-9: Operation GHG Emissions Estimates and Net Change from Existing GHG Emissions Estimates (metric tons per year)

	CO_2	CH_4	N_2O	CO_2e
Existing ATCT	1,729	1.62	0.12	1,808
Proposed Project (2028)	201	0.21	0.01	208
Net Change	-1,528	-1.41	-0.11	-1,600

Source: USEPA, 2024; SJVAPCD, 2015; CalEEMod, 2025; RS&H, 2025

As shown in **Table 3-9**, due to improvements in efficiency standards since the time the existing ATCT was constructed, the new ATCT would use less energy and, therefore, emit less GHGs compared to the existing condition. The Proposed Project would be consistent with the 2022

Scoping Plan in that it would result in fewer operational GHG emissions than existing conditions, contributing to the plan's purpose of achieving carbon neutrality and reducing anthropogenic GHG emissions by 85 percent below 1990 levels by 2045. Additionally, the Proposed Project would comply with the latest California Energy Efficiency Standards and CALGreen standards, which would ensure that the Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the impact would be ***less than significant***.

3.9.5.4 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

The incremental increase in GHG emissions resulting from construction of the Proposed Project would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

Operation of the Proposed Project would result in less GHG emissions than the operation of the existing ATCT. The City would implement all feasible and applicable GHG reduction measures during construction and operation of the new ATCT recommended by SJVAPCD for indirect sources, and the emissions control measures identified in **Section 3.4.5.1**. Thus, the Proposed Project would not conflict with California's goal of carbon neutrality by 2045 and would, therefore, be consistent with the 2022 Scoping Plan, AB 1279, and AB 32. As previously stated, the Proposed Project would comply with the latest California Energy Efficiency Standards and CALGreen standards. The Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases and the impact of the Proposed Project would be ***less than significant***.

3.10 Hazards and Hazardous Materials

This section describes the existing setting related to hazards and hazardous materials based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures for the Proposed Project at FAT.

The information in this section is based on the Phase I Environmental Site Assessment (Phase I ESA) that was prepared for the Proposed Project and is included in **Appendix D** of this EIR.

3.10.1 Regulatory Setting

3.10.1.1 Federal

U.S. Environmental Protection Agency

USEPA is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained mainly in CFR Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. Management of hazardous materials is governed by the following laws (which are described below):

- Resource Conservation and Recovery Act of 1976 (RCRA) (42 USC 6901 et seq.)
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, also called the Superfund Act) (42 USC 9601 et seq.)
- Superfund Amendments and Reauthorization Act of 1986 (SARA) (Public Law 99-499)
- Toxic Substances Control Act (TSCA) (15 USC 2601 et seq.)

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. The USEPA provides oversight and supervision for federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

Resource Conservation and Recovery Act

RCRA establishes a framework for national programs to achieve environmentally sound management of both hazardous and nonhazardous wastes (42 USC 6901 et seq.). RCRA was designed to protect human health and the environment, reduce/eliminate the generation of hazardous waste, and conserve energy and natural resources. RCRA also promotes resource recovery techniques. Waste can legally be considered hazardous if it is classified as ignitable, corrosive, reactive, or toxic. Under RCRA, the USEPA regulates hazardous waste from the time that the waste is generated until its final disposal (“cradle to grave”). The Hazardous and Solid Waste Amendments of 1984 (HSWA) both expanded the scope of RCRA and increased the level of detail in many of its provisions. The Hazardous Waste Management subchapter of the RCRA deals with a variety of issues regarding the management of hazardous materials including the export of hazardous waste, state programs, inspections of hazardous waste disposal facilities, enforcement, and the identification and listing of hazardous waste.

Underground storage tanks (USTs) are regulated under Subtitle I of RCRA and its regulations which establish construction standards for new UST installations (those installed after December 22, 1988), as well as standards for upgrading existing USTs and associated piping. Since 1998, all nonconforming tanks have been required to be either upgraded or closed.

Comprehensive Environmental Response, Compensation, and Liabilities Act

CERCLA provides a framework for the remediation of hazardous waste disposal sites, provides funding for remediation, and creates a list of national priority sites (i.e., superfund sites), and provides standards and practices for conducting a Phase I ESA (42 USC Section 9601 et seq).

Superfund Amendments and Reauthorization Act of 1986

SARA made several important changes and additions to CERCLA including proposing permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites; considering the standards and requirements found in other state and federal environmental laws and regulations; providing new enforcement authorities and settlement tools; increasing state involvement in every phase of the Superfund program; and increasing the focus on human health problems posed by hazardous waste sites.

Toxic Substances Control Act

TSCA addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCB), asbestos containing material (ACM), radon, and lead-based paint (LBP). These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA, which contains life cycle provisions like those in RCRA (40 CFR Part 761). In addition to TSCA, provisions relating to PCBs are contained in the Hazardous Waste Control Law (HWCL), which lists PCBs as hazardous waste. Through the authority of TSCA Section 6, the USEPA extended worker protection requirements to state and local government employees involved in asbestos work who were not previously covered by the Occupational Safety and Health Administration's (OSHA) asbestos regulations.

USEPA Council on Polyfluoroalkyl Substances

ARFF services are required activities under FAA CFR Title 14, Part 139 for certified airports, such as FAT. Training, testing, and response to emergencies are required, including use of fire equipment with firefighting foams that contain per- and polyfluoroalkyl substances (PFAS). Prior to the early 2000s, uncontained suppressant foam was allowed to discharge to pavement surfaces and runoff to onsite stormwater drains. In recent years, USEPA has identified PFAS as emerging contaminants of concern, because of the persistence in the environment, ready migration to and in water, and bioaccumulation in organisms. In 2019, the USEPA announced its *PFAS Action Plan* that will list perfluorooctanoic acid (PFOA) and PFAS as hazardous substances under CERCLA with the maximum contaminant level process outlined in the Safe Drinking Water Act. In April 2021, the USEPA Council on PFAS was created and will be responsible for better understanding and reducing the potential risks caused by these chemicals. In addition, the California State Water Resources Control Board (SWRCB) initiated a statewide investigation of PFAS at airports, landfills, manufacturing facilities, bulk terminals, and wastewater treatment facilities. The Department of Defense (DOD) approved a new firefighting agent that is PFAS-free in January 2023. Supply for the PFAS-free firefighting agent is still not available. However, the DOD approval allows airports a path forward towards PFAS-free foam while remaining certified.

U.S. Department of Transportation

The U.S. DOT has the regulatory responsibility for the safe transportation of hazardous materials. The U.S. DOT regulations govern all means of transportation except packages shipped by mail (49 CFR Chapter I). U.S. DOT defines a hazardous material as any item or chemical which, when being transported or moved in commerce, is a risk to public safety or the environment, and is regulated as such under its Pipeline and Hazardous Materials Safety Administration regulations (49 CFR 100-199), which includes the Hazardous Materials Regulations (49 CFR 171-180).

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) was authorized by Title III of SARA and enacted by Congress as the national legislation on community safety. The law is designed to help local communities protect health, safety, and the environment from the storage and handling of toxic chemicals (42 USC Chapter 116). EPCRA improved community access to information regarding chemical hazards and facilitated the development of business chemical inventories and emergency response plans. EPCRA also established reporting obligations for facilities that store or manage specified chemicals.

The Occupational Safety and Health Administration Standard

OSHA Hazard Communication Standard (29 CFR 1910.1200) requires that workers be informed of the hazards associated with the materials they handle. For instance, manufacturers must appropriately label containers, material safety data sheets must be available in the workplace, and employers must properly train workers. Workers at hazardous waste sites must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations (29 CFR 1910.120).

Federal Occupational Safety and Health Act

The Federal Occupational Safety and Health Act of 1970 is implemented by the Federal OSHA and contains provisions for hazardous materials handling. Federal OSHA requirements are designed to promote worker safety, worker training, and a worker's right–to-know (29 CFR Section 1910 et seq , 1970).

National Emissions Standards for Hazardous Air Pollutants

Renovation and demolition of older structures and buildings increase the chances of encountering ACM. ACMs are subject to OSHA worker health and safety regulations and the National Emissions Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61). The NESHAPs are stationary source standards issued by the USEPA for hazardous air pollutants (HAP), which are pollutants that are known or suspected to cause cancer or other serious health effects, or adverse environmental effects. Asbestos is the common name for a variety of naturally occurring, fibrous silicate minerals mined for uses including thermal insulation, acoustic insulation, and fireproofing. Air toxics regulations under the CAA specify work practices for asbestos to be followed during demolitions and renovations of all facilities, including, but not limited to, structures, installations, and buildings. The regulations require a thorough inspection of facilities where the demolition or renovation operation will occur.

USEPA classifies asbestos-containing material as hazardous waste if it is “friable” and contains one percent or more asbestos as hazardous waste. In addition, USEPA considers non-friable bulk ACM waste to be non-hazardous regardless of its asbestos content.

Hazardous Material Transportation Act of 1975

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any “particular quantity or form” of a material that “may pose an unreasonable risk to health and safety or property.”

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177

The HMTA is enforced by use of compliance orders [49 USC 1808(a)], civil penalties [49 USC 1809(b)], and injunctive relief (49 USC 1810). The HMTA (Section 112, 40 USC 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement.

Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property.

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials.

3.10.1.2 State

California Environmental Protection Agency

The State of California has developed the California HWCL and the USEPA has authorized RCRA enforcement to the State of California (22 CCR Section 66260.1). Primary authority for the statewide administration and enforcement of HWCL rests with California EPA’s (CalEPA) Department of Toxic Substances Control (DTSC).

California’s Hazardous Materials Release Response Plans and Inventory Law includes the development of detailed hazardous materials inventories used and stored onsite, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds must comply with the reporting requirements and file a plan with the California Environmental Reporting System (CERS). In

California, any facility known to contain asbestos is required to have a written asbestos management plan (also known as an Operations and Maintenance Program).

Title 8, California Code of Regulations Section 1529 – Asbestos Containing Material

Title 8, CCR Section 1529 regulates asbestos exposure in all construction work where ACM is present. ACM is defined as any material that has greater than one percent asbestos. Title 8 of the CCR Section 1735 requires a pre-demolition survey for ACM.

Title 22, California Code of Regulations, Division 4.5

Title 22, CCR Division 4.5 defines materials containing greater than one percent asbestos as hazardous waste. Registration with the California Occupational Safety and Health Administration (Cal/OSHA) is required for contractors and employers that remove asbestos having an asbestos fiber content of more than 0.1 percent and 100 sq ft or more of surface area of ACM. Because CalEPA considers non-friable bulk ACM waste to be non-hazardous regardless of its asbestos content, it is not subject to regulation under Title 22 CCR Division 4.5.

CCR Title 22, Division 4.5 also contains the Environmental Health Standards for the Management of Hazardous Waste, which includes California waste identification and classification regulations. CCR Title 22, Chapter 11, Article 3, *defines the characteristics of hazardous waste.* "Soluble Threshold Limits Concentrations/Total Threshold Limits Concentration Regulatory Limits," identifies the concentrations *of various compounds* at which soil *and groundwater are* determined to be a California hazardous waste.

Title 17, California Code of Regulations, Division 1, Chapter 8 – Lead-Based Paint and Lead Hazards

Lead is regulated through several statutes, including TSCA, RCRA, and EPCRA. OSHA regulates workplace lead exposure. Title 17 CCR, Division 1, Chapter 8, provides guidance for accreditation, certification, and work practices for LBP and lead hazards. LBP is defined in Title 17 as paint or other surface coatings that contain an amount of lead equal to, or more than, 1 milligram per square centimeter (1.0 mg/cm^2); or half of one percent (0.5 percent) by weight.

Title 17 of the CCR presumes that paint on structures built before January 1, 1978, is LBP and disturbance of that structure requires use of lead-safe work practices, including containment and cleaning of the work area after the project is completed.

Porter-Cologne Water Quality Control Act (California Water Code, § 13000 et seq.)

The Porter-Cologne Water Quality Control Act regulates water quality through the SWRCB and RWQCBs (CVRWQCB is the RWQCB for the region that includes the Airport). It provides oversight of water monitoring and contamination cleanup and abatement.

Hazardous Materials Release Response Plans and Inventory Law (California Health and Safety Code, § 25500 et seq.)

This section of the California Health and Safety Code requires facilities using hazardous materials to prepare hazardous materials business plans.

Hazardous Waste Control Act (California Health and Safety Code, § 25100 et seq.)

This act is analogous to the federal Resource Conservation and Recovery Act in that it regulates the identification, generation, transportation, storage, and disposal of materials deemed hazardous by the State of California.

Safe Drinking Water and Toxic Enforcement Act (Proposition 65, California Health and Safety Code, § 25249.5 et seq.)

The Safe Drinking Water and Toxic Enforcement Act is similar to the federal Safe Drinking Water Act and Clean Water Act in that it regulates the discharge of contaminants to groundwater.

Cortese List Statute (California Government Code, § 65962.5)

This regulation requires the California Department of Toxic Substances Control to compile and maintain lists of potentially contaminated sites throughout the state and includes the Hazardous Waste and Substances Sites List. The overall list is called the “Cortese” list.

California Occupational Safety and Health Administration (Cal/OSHA)

The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. Cal/OSHA is administered and enforced by the Division of Occupational Safety and Health (8 CCR Section 6300-6719, 1973). Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations in California. Because California has a federally approved OSHA program, it is required to adopt regulations that are at least as stringent as those found in Title 29 of the CFR. Cal/OSHA standards are generally more stringent than federal regulations. Among other provisions, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program for potential workplace hazards, including those associated with hazardous materials.

Cal/OSHA has established limits of exposure to lead contained in dusts and fumes. They have established rules and procedures for conducting demolition and construction activities and established exposure limits, exposure monitoring, and respiratory protection for workers exposed to lead.

California State Water Resources Control Board

Responsibility for the protection of water quality in California resides with the SWRCB and nine RWQCBs. The SWRCB establishes statewide policies and regulations for the implementation of water quality control programs mandated by federal and State water quality statutes and regulations.

The State’s UST program regulations include, among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to the SWRCB, which has delegated authority to the RWQCB, and typically on the local level to the fire department.

OEHHA Safe Drinking Water and Toxic Enforcement Act

The California Office of Environmental Health Hazards Assessment (OEHHA) is the State agency for the assessment of health risks posed by environmental contaminants. The mission of OEHHA is to protect human health and the environment through scientific evaluation of risks posed by hazardous substances. The OEHHA is one of five State departments within CalEPA. OEHHA implements the Safe Drinking Water and Toxic Enforcement Act, Proposition 65; compiles the State's list of chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans; restricts the discharges of listed chemicals into known drinking water sources at levels above the regulatory levels of concern; requires public notification of any unauthorized discharge of hazardous waste; and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

3.10.1.3 Regional and Local

Fresno County Multi-Jurisdictional Local Hazard Mitigation Plan

Fresno County prepared a local hazard mitigation plan alongside 17 participating jurisdictions. The plan was originally developed and approved in 2009 and has since underwent a comprehensive update in 2024. The purpose of the plan was to reduce or eliminate long-term risks to people and property within the county from hazards. In order to meet their identified goals and objectives, the plan encourages each participating jurisdiction to enforce a number of mitigation actions. The County and the participating jurisdiction conduct a hazards risk assessment and strives to update the plan every five years at a minimum (Fresno County, 2024a).

Fresno County Hazardous Materials Business Plan Program

The Fresno County Department of Public Health developed the Hazardous Materials Business Plan (HMBP) Program in support of AB 1429 which changed the required reporting frequency for hazardous materials handlers. The purpose of HMBP is to protect public health, the environment and groundwater from risks or adverse effects associated with the improper storage and handling of hazardous materials. The program strives to prepare the community to be able to respond and be protected from large-scale hazardous spill incidents. The program requires all businesses that handle and/or store hazardous materials greater than or equal to the minimum reportable quantities to complete a Hazardous Materials Business Plan (Fresno County, 2024b). The minimum reportable quantities are as follows:

- 55 gallons for liquids
- 500 pounds for solids
- 200 cubic feet (at standard temperature and pressure) for compressed gases

City of Fresno General Plan

The City of Fresno General Plan addresses risks posed by hazardous materials under its Noise and Safety Element. The following policies and objectives are applicable to the Proposed Project (City of Fresno, 2014a):

- **Policy NS-4-a: Processing and Storage.** Require safe processing and storage of hazardous materials, consistent with the California Building Code and the Uniform Fire Code, as adopted by the City.
- **Policy NS-4-c: Soil and Groundwater Contamination Reports.** Require an investigation of potential soil or groundwater contamination whenever justified by past site uses. Require appropriate mitigation as a condition of project approval in the event soil or groundwater contamination is identified or could be encountered during site development.
- **Policy NS-4-e: Compliance with County Program**. Require that the production, use, storage, disposal, and transport of hazardous materials conform to the standards and procedures established by the County Division of Environmental Health. Require compliance with the County's Hazardous Waste Generator Program, including the submittal and implementation of a Hazardous Materials Business Plan, when applicable.

City of Fresno Municipal Code

Chapter 10, Article 14 of the City of Fresno Municipal Code discusses guidelines pertaining to hazardous spills and recovery of expenses. This section specifies that "any person causing a release or threatened release which results in an emergency action shall be liable to the City of Fresno for the recoverable costs resulting from the emergency action" (City of Fresno, 2024c).

City of Fresno Fire Department

The City of Fresno Fire Department (FFD) recognizes the potential for hazardous materials emergencies to occur and has, therefore, established a Hazardous Materials Response team (HMRT) that embraces an all-hazards approach to emergency response to ensure community safety under the event where hazardous materials are released. In addition, FFD has established an ARFF plan to provide prompt response to all emergencies at the Airport (Fresno Fire Department, 2019).

3.10.2 Significance Thresholds

Significant impacts related to hazards and hazardous materials would occur if implementation of the Proposed Project would result in any of the following:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.10.3 Methodology

For the purposes of this EIR, a Phase I ESA was performed in general conformance with the scope and limitations of ASTM E-1527-13 and E-1527-21, *Standard Practices for Environmental Site Assessments: Phase I Environmental Site Assessment Process* and 40 CFR Part 312, *Standards and Practices for All Appropriate Inquiry – Final Rule* (see **Appendix D**). The purpose of the assessment was to analyze the potential presence of hazardous materials within the project study area and was conducted by completing the following:

- Review of regulatory agency and other records
- Review of the physical setting
- Review of historical land use
- Reconnaissance of the project study area and its vicinity
- Interviews with past and present owners or operators; and
- Development of conclusions and recommendations, as applicable.

3.10.4 Existing Conditions / Environmental Setting

3.10.4.1 Background

Materials and waste may be considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). A hazardous material is defined as “a substance or material that […] is capable of posing an unreasonable risk to health, safety, and property when transported in commerce” (49 CFR 171.8). California Health and Safety Code Section 25501 defines a hazardous material as follows: hazardous material means any material that, because of its quantity, concentration, or physical, or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

Hazardous wastes are defined in California Health and Safety Code Section 25141(b) as wastes that because of their quantity, concentration, or physical, chemical, or infectious characteristics, may do either of the following:

1. Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness
2. Pose a substantial present or potential hazard to human health or the environment due to factors including, but not limited to, carcinogenicity, acute toxicity, bio-accumulative

properties, or persistence in the environment, when improperly treated, stored, transported, disposed of, or otherwise managed.

Airport hazards also include aircraft collisions with birds and other wildlife, which is a serious public safety problem. The City maintains an Airport-specific sustainability management plan, which includes measures to minimize wildlife strikes.

3.10.4.2 Hazardous Substances Sites

The regulatory agency database search conducted for the Proposed Project identified 167 agency-listed hazardous sites within a one-mile radius of the project study area. No records of contamination within the project study area were identified in the Phase I ESA. Additionally, the existing ATCT and adjacent facilities are not listed on the Federal National Priorities List (NPL) LIENS database. The project study area and immediately surrounding area were historically used for agricultural purposes and aircraft operations, including maintenance and service, rental car facilities, and other similar airport operations. These types of uses are typically associated with the potential release of petroleum products and other hazardous materials, such as lead arsenate, pesticides and herbicides. Although no records of contamination impacting the project study area were identified from these facilities as part of the regulatory review, long-term operations of this nature are land uses reasonably associated with the potential release of petroleum products and other hazardous materials, such as lead arsenate, pesticides and herbicides. Lead arsenate, historically used as a pesticide well into the 1940s, breaks down over time, becoming lead and arsenic that settle into the topsoil. The only database listing with the project study area is for a “vacant lot” located at N. Fine Avenue and E. Andersen Avenue, which may be associated with the location of the proposed staging area. This location was identified on the Fresno Certified Unified Public Agency (CUPA) Listing database, which only noted that the location was identified for “miscellaneous site assessment.” No further information was available.

3.10.4.3 Hazardous Materials

The Phase I ESA documented that asbestos-containing wastes were removed from the existing ATCT and ARFF buildings in 2019 and 1996, respectively. Therefore, there is a potential for asbestos-containing materials associated with these removal, handling and disposal activities to be present in shallow soils in the vicinity of these buildings. Based on the ages of these buildings, LBP and PCBs could also be present in building materials. Weathering of these materials over time could constitute a source for lead and PCBs to have accumulated in shallow soils within the project study area.

FAT is known to have subsurface impacts to soil and groundwater of volatile organic compounds including tetrachloroethylene (PCE) and trichloroethylene (TCE). Investigations indicated that the source of these impacts was the former aircraft and military operations. Additional information obtained during interviews conducted as part of the Phase I ESA indicated that a final remedial action plan was prepared for soil and groundwater related to Hammer Field, which was the military base formerly located at the existing FAT site, for soil and groundwater contamination. Additionally, TCE, 1,2,3-trichloroproane (TCP), and PFAS/PFOAS were detected at various locations at FAT and may be present within the project study area.

The Phase I ESA also identified several records of leaking underground storage tanks (LUSTs) in the immediate vicinity of the project study area, an emergency generator shed that appears to

be associated with a diesel aboveground storage tank (AST), and reports of PFAS detected in shallow soils associated with the ARFF facility.

According to SWRCB's GeoTracker site, due to historic firefighting activities that occurred at the Airport prior to the early 2000s, the Airport is being monitored by CRWQCB for PFAS contamination and is currently under a cleanup program (California State Water Resources Control Board, 2025).

3.10.4.4 Schools within One-Quarter Mile

Sensitive receptors are people or other organisms that are considered to have a substantially increased sensitivity or rate of exposure to contaminants, such as children and the elderly. Because of this increased sensitivity, special consideration must be given to projects located near sensitive receptors. CEQA specifically establishes that special consideration must be given to projects located near schools (i.e., within one-quarter mile) when considering hazards and hazardous materials (PRC Sections 21151.2 and 21151.4). This consideration allows for careful examination and disclosure of potential health effects on children associated with exposure to hazardous materials, wastes, and substances, as well as other hazards. According to the Fresno Unified School District, there are no schools within one-quarter mile of the project study area (Fresno Unified School District, 2024). The closest school to the project study area is Sierra Charter School, located about 0.5 miles southwest.

3.10.5 Environmental Impacts and Mitigation

3.10.5.1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

Construction of the Proposed Project would include the use of lubricants and fuels for the operation of construction vehicles and equipment. In addition, construction of the Proposed Project would involve the use, transport, and disposal of the hazardous materials, including paints, solvents, coatings, cement, glues, lubricants, and fuels. The Phase I ESA identified the potential for the existing ATCT to contain ACM, LBP and PCBs, which would be demolished following construction of a new ATCT. The Proposed Project would also disturb soils where PFAS may have been historically released and that could contain asbestos from prior abatement activities. The removal, handling, storage, transport, and treatment or disposal of hazardous materials are subject to federal, State, and local requirements related to hazardous waste. These requirements include: SJVAPCD requirements for demolitions and renovations; Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from CCR Title 8, Part 61, and CFR Subpart M (pertaining to asbestos).

Operation of the Proposed Project would not involve the routine transport, use, or disposal of hazardous materials.

Because of the potential for hazardous materials within the project study area, the impact related to the routine transport, use, or disposal of hazardous materials is ***potentially significant*** and the below measures would be implemented.

<u>Hazardous Materials Mitigation Measures</u>

The below measures will be implemented by the City to avoid, minimize, or mitigate for potential hazardous materials impacts. Additionally, all work will be conducted in compliance with

applicable federal, State, and local regulations, including the State's NPDES General Industrial Permit and the Airport's SWPPP with BMPs for spill prevention, response, and pollution prevention measures.

- Mitigation Measure HAZ-1: Hazardous Materials Plans. The following plans will be developed by the contractor under the direction of the City and submitted to the indicated agency for review and/or approval prior to construction:
  - Hazardous Materials Management Plan (HMMP): describes the proper use, handling, and storage practices and procedures for hazardous materials management. Approval Agency: Fresno County Environmental Health Department
  - Spill Prevention Control and Countermeasures (SPCC) Plan: details how project storage facilities for petroleum products would be constructed, operated, and maintained. Approval Agency: City of Fresno
  - Site Management Plan (SMP): provides guidelines to protect human health during grading and construction activities will be prepared. Approval Agency: City of Fresno
  - Hazardous Materials Contingency Plan (HMCP): address potential contamination in soil, soil vapor, and groundwater from releases on or near the Proposed Project, as well as the potential for existing hazardous materials on site (e.g., drums and tanks). Approval Agency: Fresno County Department of Public Health
  - Health and Safety Plan (HASP): outline measures to protect construction workers and the public from exposure to hazardous materials during demolition and construction activities. Approval Agency: City of Fresno
- Mitigation Measure HAZ-2: Pre-Demolition Survey. A pre-demolition survey will be performed to identify hazardous building materials including ACM, LBP, and PCBs. The results of the survey will determine what hazardous materials are present and be the basis for the development of a comprehensive HMMP.
- Mitigation Measure HAZ-3: Limited Soil Investigation. As recommended in the Phase I ESA and based on the results of the potential for ACM, LBP, PCBs, and PFAS identified within the Project Study Area, a limited soil investigation will be conducted prior to construction to evaluate and address hazardous materials in soil that could be disturbed through construction activities within the Project Study Area. The investigation will follow requirements of the SJVAPCD and a soil investigation plan will be developed by a qualified contractor prior to the start of any testing. The plan will identify the testing protocols, the locations where samples will be collected, the contaminants that will be tested for, and the standards used to determine if contamination is present. If contamination is found to exceed applicable regulatory thresholds, cleanup of contaminated sites, including the implementation of engineering controls, will be completed by the City before construction.
- Mitigation Measure HAZ-4: Removal, Handling, Storage, Transport, Treatment, and Disposal. Materials identified during the pre-demolition survey will be abated prior to demolition and disposed of at a landfill authorized to accept such waste. Any project-

related demolition activities that have the potential to expose construction workers and/or the public to ACMs, LBP, or PCBs will be conducted in accordance with applicable regulations. The removal, handling, storage, transport, and treatment or disposal of contaminated materials from the limited soil investigation will be subject to federal and State requirements related to hazardous waste. There are two operating commercial hazardous waste facilities in California. The Kettleman Hills facility is located in Kings County, approximately 60 miles from FAT and accepts solid, semi-solid, liquid hazardous, and extremely hazardous wastes. Kettleman Hills is the only facility in California that is permitted to dispose of PCBs. The facility is open and has capacity available (Department of Toxic Substances Control, 2025).

- Mitigation Measure HAZ-5: Worker Hazardous Material Procedures Training. Prior to construction, workers will be trained in hazardous material procedures by a HAZWOPER-certified trainer selected by the contractor and approved by the City to minimize the potential exposure of the public and site workers to potential hazardous materials.

Significance with Mitigation

With implementation of the above measures, the potential effect associated with the routine transport, use, or disposal of hazardous materials would be minimized to ***less than significant with mitigation incorporated***.

3.10.5.2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment

Hazardous or potentially hazardous materials would be present during the demolition and construction of the Proposed Project. Although the transport and use of hazardous materials are governed by numerous regulations, there is still a chance a spill or accidental release could occur. However, compliance with relevant federal, State, and local regulations would reduce the risk of a spill or accidental release of hazardous materials that would expose the public or the environment to substantial hazards. The Airport also complies with the State's NPDES General Industrial Permit and maintains a SWPPP that outlines construction BMPs for pollution prevention. Compliance with these, and other rigorous federal, State and local regulatory requirements, would ensure that effects related to hazardous materials and waste products during construction activities are avoided or minimized.

As described in **Section 3.10.4.3**, asbestos, LBP, and PCBs could be encountered during building demolition. Any project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos, LBP, or PCBs would be conducted in accordance with applicable regulations outlined in **Section 3.10.1**.

PFAS has been detected in the soils in the vicinity of the ARFF building within the project study area. In addition, there is potential for petroleum hydrocarbons (aviation fuel, diesel, gasoline, oil, and grease) and other hazardous substances to be present in the soils within the project study area. Therefore, construction activities associated with the Proposed Project may expose potentially contaminated soil and groundwater. The measures identified in **Section 3.10.5.1** would limit any potential for exposure to hazardous substances.

Additionally, all work would be conducted in compliance with applicable federal, State, and local regulations, including the State's NPDES General Industrial Permit and the Airport's SWPPP with BMPs for spill prevention, response, and pollution prevention measures.

Operation of the Proposed Project would not require the use of hazardous materials. Nonetheless, existing regulatory requirements and safeguards related to the use of hazardous materials would continue to be in place to minimize the accidental release of hazardous substances to the environment or employees/people at the Airport. As a result, operation of the Proposed Project would not create a significant hazard to the public or the environment through the release of hazardous materials through foreseeable upset or accident conditions.

Because of the potential for hazardous materials within the project study area, the impact related to the release of hazardous materials is ***potentially significant*** and the Mitigation Measures HAZ-1 through HAZ-5, as identified in **Section 3.10.5.1**, would be implemented.

Significance with Mitigation

Refer to Hazardous Materials Mitigation Measures HAZ-1 through HAZ-5 in **Section 3.10.5.1**. With implementation of the above measures, the potential effect associated with the routine transport, use, or disposal of hazardous materials would minimized to ***less than significant with mitigation incorporated***.

3.10.5.3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school

There are no schools within one-quarter mile of the project study area. Additionally, there are no known proposed schools within one-quarter mile of the project study area. A new school proposed within one-quarter mile of the project study area would require approval by the Airport Land Use Commission (ALUC) due to land use safety requirements identified in the Airport Land Use Compatibility Plan (ALUCP) (Fresno County Airport Land Use Commission, 2018). As such, it is unlikely that a new school would be constructed within one-quarter mile of the project study area at any point in the future. Thus, the Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, there would be ***no impact***.

3.10.5.4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment

According to the California Department of Toxic Substances Control EnviroStor database, the project study area is not located on a federal superfund site, state response site, voluntary cleanup site, school cleanup site, evaluation site, school investigation site, military evaluation site, tiered permit site, or corrective action site (California Department of Toxic Substances Control, 2023). Additionally, the project study area is not included on the list of hazardous waste sites compiled pursuant to Government Code Section 65962.5 (California Environmental Protection Agency, 2023). As a result, the Proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment. No hazards to the public or environment are anticipated, and there would be ***no impact***.

3.10.5.5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area

The Proposed Project consists of the replacement of the existing ATCT at an existing public airport. Proposed activities of demolition and construction may result in a safety or noise hazard for people working in the vicinity of the project study area. Excessive noise hazards as a result of construction are addressed in **Section 3.14, Noise**.

Following the previously identified regulations would ensure that construction of the Proposed Project would not result in a safety hazard or excessive noise for people residing or working in the project area

The Proposed Project is within an operating airport, and no additional safety hazards for people residing or working in the vicinity of the project study area would be of concern once the construction is completed. Noise levels would be similar to existing levels, which are typical for an active public airport. Hazards associated with bird strikes are minimized through the use of measures identified in the Airport sustainability management plan and the Proposed Project would not introduce any new wildlife hazards. The Proposed Project would not result in a safety hazard or excessive noise for people residing or working in the project area and the impact would be ***less than significant***.

3.10.5.6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

The Proposed Project would not impair or physically interfere with any adopted emergency response plan or emergency evacuation plan. The City maintains emergency response and evacuation plans for the Airport (City of Fresno, 2022). The Proposed Project would adhere to the FFD and General Plan requirements for emergency vehicle access. Surrounding roadways would continue to provide emergency access to the project study area during the Proposed Project's construction and operation. In addition, the Proposed Project would not interfere with airport operations or flights and would not result in reduced emergency access, response, or evacuation. Therefore, the Proposed Project would not result in inadequate emergency vehicle access, and the impact would be ***less than significant***.

3.10.5.7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires

The project study area is mapped as Local Responsibility Area Unzoned, indicating that the area is urbanized, not susceptible to wildland conflagrations, and is not located within a very high fire hazard severity zone (VHFHSZ) (California Department of Forestry and Fire Protection, 2023). Therefore, the Proposed Project would not expose people or structures, either directly or indirectly, to a significant loss, injury or death involving wildland fires and there would be ***no impact***.

3.11 Hydrology and Water Quality

This section describes the existing setting related to hydrology and water quality based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.11.1 Regulatory Setting

3.11.1.1 Federal

Clean Water Act

The 1972 Clean Water Act (CWA) (USC Title 33, Section 1251 et seq., 1972), is the overarching federal law intended to protect, restore, and maintain the chemical, physical, and biological integrity of the nation's waters. The CWA provides the basic structure for establishing water quality standards and regulating the discharge of pollutants into waters of the United States through programs further discussed in this section.

National Pollutant Discharge Elimination System (NPDES)

USEPA developed the NPDES, under CWA Section 402, establishing a framework for the regulation of discharges to waters of the United States to ensure water quality standards for applicable water body use designations are attained through a permitting program. NPDES requires non-stormwater discharges, such as municipal or industrial wastewater, to be authorized by a permit containing limits on allowable pollutant quantities that can be discharged. Additionally, NPDES was expanded to include stormwater discharges from several sources including stormwater discharges from certain municipal separate storm sewer systems (MS4), construction activities that result in a land disturbance of one acre or more, or areas less than one acre if part of a larger common plan of development, and facilities discharging stormwater exposed to regulated industrial activity. In California, the authority to administer the NPDES program has been delegated to the State.

Total Maximum Daily Load (TMDL)

Under Section 303(d) of the CWA, the Total Maximum Daily Load (TMDL) program establishes standards to protect water bodies based upon their designated beneficial uses (e.g., recreational use, aquatic life support, etc.). The program defines a process to designate water bodies that are impaired due to the presence of pollutants and sensitivity to disturbance. TMDLs, an estimate of the mass load of pollutants a water body can receive and still meet applicable water quality standards and designated receiving water body uses, are established for impaired water bodies. Where applicable, TMDL requirements are incorporated into NPDES permit measures and monitoring conditions issued by the State

Spill Prevention, Control and Countermeasure Rule

The federal Oil Pollution Prevention Regulation, commonly known as the Spill Prevention, Control and Countermeasure (SPCC) rule, was promulgated in 1973 under Section 311 of the CWA with the goal of improving the nation's ability to prevent, prepare for, and respond to oil spills to protect navigable waterways. Applicable owner/operators of facilities that store and/or handle oil over aggregate bulk storage capacity threshold(s) and could reasonably be expected to have a discharge of oil in quantities that may be harmful, into or upon the navigable waters or

adjoining shorelines are required to meet SPCC requirements. These include developing and implementing a facility-specific SPCC plan with measures, such as procedures, methods, and/or equipment, to prevent oil spills from occurring, prevent spills that do occur from reaching surface waters, and minimize or eliminate potential environmental impacts (33 USC Ch.26, 2018).

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) manages the National Flood Insurance Program (NFIP), which was first established with the National Flood Insurance Act of 1968. The NFIP offers federally backed flood insurance coverage to landowners within approximately 23,000 participating communities (Federal Emergency Management Agency, 2023a). Under the NFIP, FEMA works with the floodplain administrator in each participating community to establish regulatory Flood Insurance Rate Maps (FIRMs) based on Flood Insurance Studies (Federal Emergency Management Agency, 2024a). These flood maps establish the boundaries of special flood hazard areas (SFHAs), which are areas with high risks of flooding within which floodplain management regulations are enforced and flood insurance coverage is required (Federal Emergency Management Agency, 2020). Notable flood zone designations that frequently appear on FIRMs include the following (Federal Emergency Management Agency, 2023b):

- Zone A: SFHA with a one percent annual chance of flooding where a detailed analysis has not been performed to establish the base flood elevation (BFE).
- Zone AE: SFHA with a one percent annual chance of flooding where a detailed analysis has been performed to establish the BFE.
- Zone B and X (shaded): Area of moderate flood hazard, between the limits of the one percent annual chance and 0.2 percent annual chance flood zones, or area protected by a levee from the one percent annual chance flood, or area where the flood risk is shallow or limited in extent.
- Zone C and X (unshaded): Area of minimal flood hazard above the 0.2 percent annual chance flood zone.

Federal Aviation Administration Advisory Circular 150/5200-33C

FAA AC 150/5200-33C indicates separation distances to be maintained, where possible, between AOAs and potential hazardous wildlife attractants (5,000 feet for airports serving piston-powered aircraft, 10,000 feet for airports serving turbine-powered aircraft, 5 miles to protect approach and departure airspace for all airports). Additionally, this AC provides recommendations for a variety of land uses with the potential to attract hazardous wildlife, including waste disposal, agriculture, wetlands, wastewater facilities, and stormwater management facilities. Specific recommendations applicable to stormwater detention facilities include the following (Federal Aviation Administration, 2020):

- Avoid aboveground standing water and design facilities to drain completely or infiltrate where feasible.
- Design detention basins to drain within a maximum of 48 hours following the design storm and remain dry in between storm events.

- Design detention basins with steep sides and a narrow linear shape.
- Line basins with riprap or concrete and eliminate vegetation that provides food or cover for hazardous wildlife.
- Employ physical barriers such as bird balls, covers, or wire grids to limit access to basins.

3.11.1.2 State

Porter-Cologne Water Quality Control Act

In 1969, the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) (California Water Code section 13000 et seq., 1969) was passed establishing the SWRCB as the primary agency responsible for administering and enforcing CWA requirements delegated to the State by the USEPA. The SWRCB is further divided based on hydrological barrier into nine regional water boards with delegated authority for implementing CWA Section 402 and 303(d) requirements within their respective regions. The Airport is in an area under the jurisdiction of the Central Valley Regional Water Quality Control Board (CVRWQCB) (California State Water Resources Control Board, 2022).

The Porter-Cologne Act requires that Water Quality Control Plans, or Basin Plans, are prepared for each of the nine regions governed by regional water boards. The Basin Plans designate beneficial uses, establishes water quality objectives to protect designated water uses, consisting of both narrative and numerical water quality objectives, including TMDLs; and identifies strategies and schedules for achieving the objectives (California State Water Resources Control Board, 2024a).

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014, in California Water Code Section 10720, creates a framework and authority for local water agencies to form Groundwater Sustainability Agencies (GSAs) for developing and implementing Groundwater Sustainability Plans (GSPs) at the local level. North Kings GSA is the joint powers authority in charge of developing the GSP in the portion of the Kings Subbasin that underlies the Airport. North Kings GSA consists of the following public agencies (California Department of Water Resources, 2024): Fresno Irrigation District, the County of Fresno, the City of Fresno, the City of Clovis, the City of Kerman, Biola Community Services District, Garfield Water District, and International Water District. The North Kings GSA strives to achieve a balanced groundwater supply by 2040 through the GSP it implements for their portion of the Kings Subbasin. Apart from the North Kings GSA, there are six other GSAs in the Kings Subbasin.

Construction General NPDES Permit

Under the NPDES delegated to the State, construction activities that result in a land disturbance of one acre or more, including areas less than one acre if part of a larger common plan of development, are required to obtain coverage under the *NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ,* (CGP) identified as NPDES No. CAS000002. Permit requirements include preparation of a SWPPP, by a Qualified SWPPP Developer, containing measures to prevent pollutants caused by land disturbance activities (e.g., erosion and sediment) and non-

stormwater discharges or spills from affecting surface water quality. Provisions for monitoring, recordkeeping, and reporting are included in the permit.

Industrial General NPDES Permit

Facilities discharging stormwater associated with regulated industrial activities are required by the CWA NPDES to obtain permit coverage. The SWRCB and CVRWQCB collectively issue individual permits, or applicable facilities may obtain coverage under a *General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. 2014-0057-DWQ*, (IGP) identified as NPDES No. CAS000001. Permittees must develop and implement a facility-specific SWPPP assessing potential pollutant sources from industrial activities; establishing measures to control or prevent pollutant discharges; and detailing sampling and analysis procedures for monitoring water quality of stormwater discharged under coverage of the IGP. Regulated industrial activities implemented by the City and tenants at the Airport include shipping, trucking, and air transport facilities that conduct vehicle maintenance or equipment cleaning operations, and facilities where materials are stored in exposed areas. As such, the City has obtained coverage for the Airport under the IGP. Airport tenants engaged in regulated industrial activities within the AOA and subject to the IGP are included under the City's General or may obtain their own IGP.

State Antidegradation Policy

In 1968, the SWRCB certified Resolution 68-16 to adopt a policy of maintaining high quality of waters in California, commonly known as the Antidegradation Policy. The policy requires that the quality of existing high-quality waters be maintained to maximum benefit of the people of the State. The policy is primarily relevant to the implementation of the State's NPDES permitting program and provides the regulatory framework for addressing a modification to an NPDES permit that would result in lower water quality but would provide socioeconomic and public benefits. The SWRCB is considering revising the policy to improve the usefulness for supporting decisions regarding discharges that affect groundwater; however, no active work on the revision is underway (California State Water Resources Control Board, 2018).

California Toxics Rule

Under CWA, states are required to have enforceable numeric water quality criteria addressing priority toxic pollutants in surface waters to protect human health and aquatic life beneficial uses. Due to a deficiency in enforceable standards, the USEPA promulgated the National Toxics Rule for several states including California in 1992, supplemented by the California Toxics Rule in 2000 for the State specifically. The rule is applicable to inland surface waters, enclosed bays, and estuaries in the state (U.S. Environmental Protection Agency, 2000).

California Building Code

CCR Title 24, Part 2 codifies the CBC, which is based on the International Building Code. The CBC defines minimum standards related to the design, construction, materials, occupancy, location, and maintenance of structures. Select requirements in the CBC relate to the construction of structures within flood hazard areas. Section 1612 specifically addresses requirements relevant to construction in flood hazard areas, and Appendix G of the CBC provides additional information on flood-resistant construction consistent with the requirements of the NFIP. Construction documents submitted with the building permit application are required

to show the location of structures relative to flood hazard areas and floodways, as well as design flood elevations. Structures within flood hazard areas are required to be designed and constructed to resist flood hazards and loads, and constructed elements below the design flood elevation are required to be flood damage resistant. Prior to approving any construction or encroachment within the floodway, building officials are to require submission of a certification demonstrating that the activity will not increase the base flood level (California Building Standards Commission, 2024b).

CALGreen

Certain projects in California must comply with CALGreen. Section 5.1 of the CBC details the planning and design methods that support environmentally responsible practices required by the Code and details requirements for stormwater pollution prevention for projects that disturb one or more acres of land (5.106.2). Section 5.3 addresses Water Efficiency and Conservation and details indoor and outdoor water usage standards (California Building Standards Commission, 2024a).

3.11.1.3 Regional and Local

Central Valley Regional Water Quality Control Board

The CVRWQCB Plan (Basin Plan), which covers the location of the Airport, was first adopted in 1975 and has most recently been updated in 2017. The Basin Plan provides the regulatory framework to preserve, enhance and protect surface water and groundwater quality in the region. It provides a statement of the beneficial waters that will be protected, it lists the water quality objectives to protect beneficial water uses and defines the strategies and schedules for meeting the stated objectives (Central Valley Regional Water Quality Control Board, 2019).

Implementation of the Basin Plan involves a water quality control program that employs a variety of approaches to surface water, groundwater, and wetland protection and management which are described in the plan. Each approach described in the Basin Plan is regulated and controlled through project specific permits.

Fresno Metropolitan Flood Control District Act of 1955

The Fresno Metropolitan Flood Control District Act of 1955 directed the Fresno Metropolitan Flood Control District (FMFCD) to develop a Storm Drainage and Flood Control Master Plan (SDFCMP). The FMFCD adopted the SDFCMP to mitigate the impacts of land development in the Fresno-Clovis area in a comprehensive and integrated manner through the FMFCD's regional system of flood and stormwater management facilities. The plan sets forth a specific program for the construction of new facilities and the ongoing restoration and maintenance of channel hydrology.

City of Fresno General Plan

The City of Fresno's General Plan Parks, Open Space, and Schools Element; Public Utilities and Services Element; and Resource Conservation and Resilience Element include the following objectives and policies relevant to the Proposed Project that pertain to the management and safe development of the City's potable water resources (City of Fresno, 2014a):

- **Policy POSS-6-b: Effects of Stormwater Discharge.** Support efforts to identify and mitigate cumulative adverse effects on aquatic life from stormwater discharge to the San Joaquin River.
    - Avoid discharge of runoff from urban uses to the San Joaquin River or other riparian corridors.
    - Approve development on sites having drainage (directly or indirectly) to the San Joaquin River or other riparian areas only upon a finding that adequate measures for preventing pollution of natural bodies of water from their runoff will be implemented.
    - Periodically monitor water quality and sediments near drainage outfalls to riparian areas. Institute remedial measures promptly if unacceptable levels of contaminant(s) occur.
- **Policy PU-7-a: Reduce Wastewater.** Identify and consider implementing water conservation standards and other programs and policies, as determined appropriate, to reduce wastewater flows.
- **Policy PU-7-b: Reduce Stormwater Leakage.** Reduce storm water infiltration into the sewer collection system, where feasible, through a program of replacing old and deteriorated sewer collection pipeline; eliminating existing stormwater sewer cut-ins to the sanitary sewer system; and avoiding any new sewer cut-ins except when required to protect health and safety.
- **Policy PU-8-c: Conditions of Approval.** Set appropriate conditions of approval for each new development proposal to ensure that the necessary potable water production and supply facilities and water resources are in place prior to occupancy.
- **Policy PU-8-f: Water Quality.** Continue to evaluate and implement measures determined to be appropriate and consistent with water system policies, including prioritizing the use of groundwater, installing wellhead treatment facilities, constructing aboveground storage and surface water treatment facilities, and enhancing transmission grid mains to promote adequate water quality and quantity.
- **Policy PU-8-g: Review Project Impact on Supply.** Mitigate the effects of development and capital improvement projects on the long-range water budget to ensure an adequate water supply for current and future uses.
- **Policy RC-6-b: Water Plans.** Adopt and implement ordinances, standards, and policies to achieve the intent of the City of Fresno Urban Water Management Plan, Fresno-Area Regional Groundwater Management Plan, and City of Fresno Metropolitan Water Resources Management Plan to ensure a dependable supply of water.
- **Policy RC-6-c: Land Use and Development Compliance.** Ensure that land use and development projects adhere to the objective of the Fresno Metropolitan Water Resources Management Plan to provide sustainable and reliable water supplies to meet the demand of existing and future customers through 2025.

- **Policy RC-6-h: Conditions of Approval.** Include in the Development Code standards for imposing conditions of approval for development projects to ensure long-term maintenance of adequate clean water resources. Require findings that adequate water supply must exist prior to any discretionary project approval for residential and commercial development requiring annexation, as required by law.
- **Policy RC-7-c: Best Practices for Conservation.** Require all City facilities and all new private development to follow U.S. Bureau of Reclamation Best Management Practices for water conservation, as warranted and appropriate.
- **Policy RC-7-d: Update Standards for New Development.** Continue to refine water saving and conservation standards for new development.
- **Policy RC-7-e: Retrofit City Facilities, and Consider Incentives Programs to Encourage Retrofitting of Other Existing Public and Private Residential and Non-Residential Facilities and Sites.** Reduce water use in municipal buildings and City operations by developing a schedule and budget for the retrofit of existing municipal buildings with water conservation features, such as auto shut-off faucets and water saving irrigation systems. Prepare a comprehensive incentive program for other existing public and private residential and non-residential buildings and irrigation systems.
- **Policy RC-7-h: Landscape Water Conservation Standards.** Refine landscape water conservation standards that will apply to new development installed landscapes, building on the State Model Water Efficient Landscape Ordinance and other State regulations.
    - Evaluate and apply, as appropriate, augmented xeriscape, “waterwise,” and “green gardening” practices to be implemented in public and private landscaping design and maintenance.
    - Facilitate implementation of the State’s Water Efficient Landscape Ordinance by developing alternative compliance measures that are easy to understand and observe.

City of Fresno Municipal Code

Chapter 6, Article 7 of the City of Fresno Municipal Code is known as the Urban Storm Water Quality Management and Discharge Ordinance and establishes guidelines to reduce pollutants in urban stormwater discharges by prohibiting non-stormwater discharges from entering the storm drain system (City of Fresno, 2024d).

Chapter 11 Article 6 of the City’s Municipal Code is known as the Fresno Flood Plain Ordinance which provides floodplain management regulations to minimize public and private losses due to flood conditions. This ordinance specifies the following methods and provisions to reduce flood losses (City of Fresno, 2024e):

- Restrict or prohibit uses which are dangerous to health, safety, and property due to water or erosion hazards, or which result in damaging increases in erosion or flood heights or velocities;
- Require that uses vulnerable to floods, including facilities which serve such uses, be protected against flood damage at the time of initial construction;

- Control filling, grading, dredging, and other development which may increase flood damage;
- Prevent or regulate the construction of flood barriers which will unnaturally divert flood water or which may increase flood hazards in other areas; and
- Control the alteration of natural flood plains, stream channels, and natural protective barriers, which help accommodate or channel flood waters.

3.11.2 Significance Thresholds

Significant impacts related to hydrology and water quality would occur if implementation of the Proposed Project would result in any of the following:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

   i. Result in a substantial erosion or siltation on- or off-site;

   ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

   iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

   iv. Impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.11.3 Methodology

Information from relevant State and local plans, documents, and studies that address hydrological resources in the vicinity of the project study area was reviewed and summarized to describe existing conditions and to identify potential environmental effects on hydrology and water quality.

3.11.4 Existing Conditions / Environmental Setting

3.11.4.1 Hydrology

The project study area is located within the city of Fresno, which lies within the Kings Subbasin of the San Joaquin Valley Groundwater Basin (California Department of Water Resources, 2019). The Kings Subbasin is comprised of about 1,530 square miles in the southern half of the San Joaquin Valley Groundwater Basin and is generally bounded by the San Joaquin River to the north, the alluvium-granitic rock interface of the Sierra Nevada foothills to the east, the southern fork of the Kings River to the south, and the Delta-Mendota and Westside Subbasins to the west (California Department of Water Resources, 2006).

Average annual precipitation in the city of Fresno is approximately 11.5 inches per year (National Oceanic and Atmospheric Administration, 2024). Precipitation occurs mostly from November through April.

FAT currently complies with the IGP for discharges of stormwater associated with industrial activities. In compliance with the NPDES permit, the Airport also maintains a SWPPP. A SWPPP includes features designed to eliminate contact of rainfall and stormwater runoff with sources of pollution that occur on construction sites, the main source being soil erosion resulting from unstable soils coming in contact with water and wind. These features are known as BMPs.

According to the SWPPP, there are four drainage areas on Airport property. The project study area is located within the Peach/McKinley Drainage Area which channels water to a ponding basin at the corner of E. McKinley and Peach Avenues, located about 0.45-mile southeast of the project study area (see **Figure 3-2**). While there are no surface waters within the project study area, stormwater runoff would eventually discharge into the Mill Ditch via pump station (see **Figure 3-2)**.

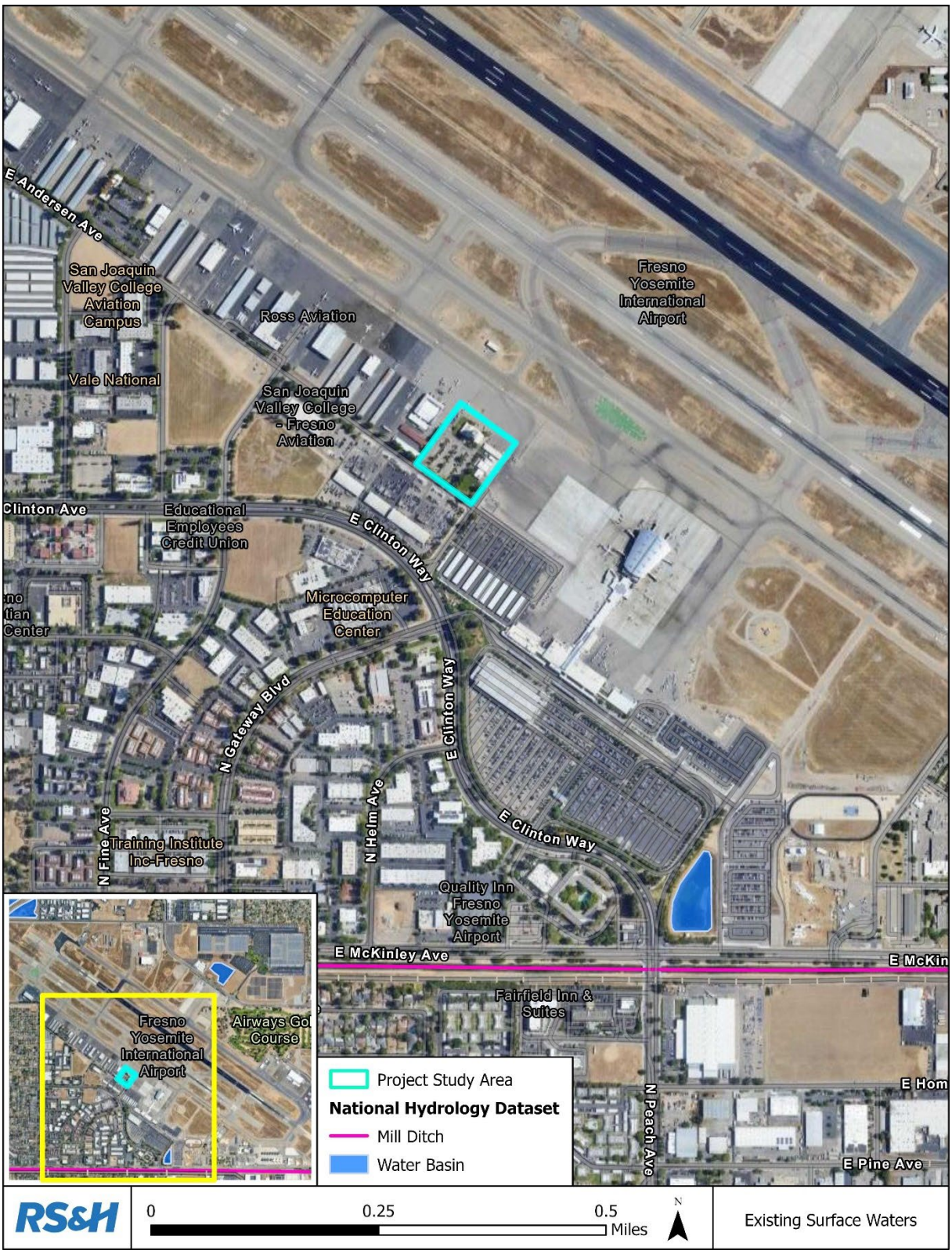
Flood control and stormwater collection and disposal in the city of Fresno, city of Clovis, and the unincorporated areas within the City of Fresno's sphere of influence are provided by FMFCD.

3.11.4.2 Groundwater

The project study area is within the Kings Subbasin (5-22.08) which is part of the overall San Joaquin Valley Groundwater Basin. The San Joaquin Valley Groundwater Basin is located within the Tulare Lake Hydrologic Region. Within the Kings Subbasin, the project study area is in the recharge area of the Fresno Sole Source Aquifer (U.S. Environmental Protection Agency Region 9, 2008).

One of the primary objectives of Fresno's future water supply plans detailed in Fresno's current Urban Water Management Plan (UWMP) is to balance groundwater operations through a host of strategies (City of Fresno, 2020a). Through careful planning, Fresno has designed a comprehensive plan to accomplish this objective by increasing surface water supplies and surface water treatment facilities, intentional recharge, and conservation, thereby reducing groundwater pumping. The City continually monitors impacts of land use changes and development project proposals on water supply facilities by assigning fixed demand allocations to each parcel by land use as currently zoned or proposed to be rezoned. Additionally, there are seven total GSAs within the Kings Subbasin that collaborate to establish sustainable approaches to manage, monitor, and use groundwater. The project study area lies within the jurisdictional boundary of the North Kings GSA.

Figure 3-2: Existing Surface Waters



Source: USGS, 2024; RS&H, 2024.

In 2014, the City updated its Metropolitan Water Resources Management Plan, which is designed to ensure the Fresno metropolitan area has a reliable water supply through 2025 (City of Fresno, 2014b). The plan implements a conjunctive use program, combining groundwater, treated surface water, artificial recharge and an enhanced water conservation program. The plan identifies that groundwater will continue to be an important part of the City's supply but will not be relied upon as heavily as has historically been the case. Instead, the plan guides the City to rely on expanding their delivery and treatment of surface water supplies and groundwater recharge activities.

Currently, rainfall and stream flow replace about half of the water pumped by the City annually, and the City would use surface water from Millerton Kake and Pine Flat Reservoir to recover the other half of pumped groundwater (City of Fresno, 2024f). To aid with the groundwater recharge effort, the City of Fresno has designated a groundwater recharge basin on Airport property (northwest of the airfield) that allows water to pond and percolate into the Fresno Aquifer for later use. The recharge basin is known locally as Leaky Acres and is 210-acres in size.

As reported in the Phase I ESA, during subsurface investigation work conducted at FAT in 2022, groundwater was encountered at depths that ranged from approximately 112 feet to 133 feet below ground surface (bgs) (BSK, 2022). Groundwater monitoring data from a nearby open cleanup site, west of the project study area, that lies roughly at the same elevation, recorded depths to water ranging from approximately 100 feet to 112 feet bgs (Environmental Resources Management, 2023). Groundwater beneath the project study area flows to the west and southwest (see **Appendix D**).

3.11.4.3 Water Quality

As identified in the Airport's SWPPP, the project study area is located within the Peach/McKinley Drainage Area. Stormwater from this area collects in a stormwater retention basin at the corner of E. McKinley and Peach Avenues and is discharged into the Mill Ditch via a pump station located at the basin when necessary. Mill Ditch is an artificial waterway that can eventually discharge to the San Joaquin River via the Biola Wasteway. The San Joaquin River is listed on the CWA's 2024 Impaired Waters List (Section 3030(d) list) for pH, invasive species, and temperature impairments (California State Water Resources Control Board, 2024b).

In accordance with the IGP, a SWPPP was developed for the Airport, which among other requirements, includes an assessment of potential pollutant sources from industrial activities; establishes measures to control or prevent pollutant discharges; and details sampling and analysis procedures for monitoring water quality of stormwater discharged under the IGP.

Potential pollutant sources from industrial activities and associated potential pollutants identified in the SWPPP are presented in **Table 3-10**.

The SWPPP also includes a list of minimum and advanced BMPs implemented, as necessary, to reduce and prevent potential pollutants from contacting stormwater. Minimum BMPs include:

- Good Housekeeping
- Preventative Maintenance
- Spill and Leak Prevention and Response
- Material Handling and Waste Management
- Erosion and Sediment Controls
- Employee Training Program
- Quality Assurance and Record Keeping

Table 3-10: Potential Pollutants and Pollutant Sources from Industrial Activities

Potential Pollutants	Potential Pollutant Source
Asphalt Sealant	Asphalt Crack Sealing
Aviation Gas	Aircraft Fueling, Material Storage, Mobile Aboveground Storage Tank Fueling
Aviation Grease	Aircraft Maintenance, Material Storage
Aviation Oil 110AW	Aircraft Fueling, Material Storage
Degreaser	Aircraft Fueling, Material Storage
Ethylene Glycol	Airplane Deicing, Material Storage
Diesel	Backup Generators, Material Storage, Mobile Aboveground Storage Tank Fueling, Vehicle Fueling,
Gasoline	Material Storage, Mobile Aboveground Storage Tank Fueling, Vehicle Fueling
Hazardous Waste	Waste Storage
Hazardous Waste Oil	Aircraft Fueling, Material Storage
Isopropyl Alcohol	Aircraft Fueling, Material Storage
Jet Fuel	Aircraft Fueling, Material Storage, Mobile Aboveground Storage Tank Fueling
Jet Oil	Aircraft Maintenance, Material Storage
Motor Oil	Aircraft Maintenance, Material Storage
Phos-Check MVP-F (Fire Retardant)	Transferring and Storing Fire Retardant
Raw Sewage	Airplane Lavatory Disposal
Soap	Aircraft Fueling, Aircraft Washing, Material Storage
Waste Aviation Oil	Aircraft Maintenance, Material Storage
Waste Oil	Aircraft Maintenance, Material Storage
Waste Oil (Oil/Water Separator Tank)	Material Storage

Source: Industrial Activities Stormwater Pollution Prevention Plan for Fresno Yosemite International Airport (Blair, Church & Flynn Consulting Engineers, 2022)

Advanced BMPs include:

- Exposure Minimization Shelters
- Stormwater Containment and Discharge Reduction
- Treatment Control

Under CWA, Section 303(d) TMDLs are established for pollutants discharged into water bodies designated as impaired. Because the San Joaquin River is included in 2024 California Section 303(d) list of impaired waters, monitoring requirements the following water quality parameters are routinely monitored at the Airport in accordance with the IGP:

- pH
- Oil and Grease
- Total Suspended Solids

3.11.4.4 Floodplain

The Airport is included on FEMA FIRM 06019C1590H, effective on February 18, 2009 (Federal Emergency Management Agency, 2009). According to FEMA's National Flood Hazard Layer (NFHL), there are no regulatory floodways within the project study area, and the closest floodplain is located about 0.4 miles south of the project study area (see **Figure 3-3**).

3.11.5 Environmental Impacts and Mitigation

3.11.5.1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality

During construction, there would be an increased potential to expose soils to wind and water erosion, which could result in temporary minimal increases in sediment load. In compliance with NPDES, any development project disturbing one or more acres of soil must obtain coverage under the CGP (Order 2022-0057-DWQ). Construction activities subject to the CGP include clearing, grading, and other ground-disturbing activities such as stockpiling or excavation.

The CGP requires that dischargers determine the receiving waters affected by construction activity and comply with appliable water quality standards. Moreover, the CGP requires the development of a site-specific SWPPP that provides necessary information to comply with the CGP. The SWPPP must be certified by a Qualified SWPPP Developer (QSD) and overseen by a Qualified SWPPP Practitioner (QSP).

Specific to the CGP is a prohibition of discharges that violate Basin Plans or statewide quality control plans. The CGP prohibits the discharge of non-stormwater discharges that are not otherwise authorized. Discharge of water related to flushing, testing, dust control, and dewatering can be authorized under the CGP. Discharge of hazardous materials is prohibited unless covered by the NPDES permit. Additionally, the CGP establishes numeric action levels (NALs) that dictate corrective action requirements by the permittee. The NALs are based on risk levels determined by the QSD and can include control measures based on pH and turbidity levels in the stormwater runoff.

Following construction, the stormwater runoff would be similar to existing conditions as the project study area is currently developed and would tie into existing drainage and stormwater systems. The City operates under the CVRWQCB NPDES MS4 permit (Order No. R5-2016-0040-014). Under the MS4 permit, post-construction water quality control measures would be implemented as required under the FMFCD's *Fresno-Clovis Storm Water Quality Management Program* (Fresno Metropolitan Flood District, 2013). Therefore, with compliance of the regulations listed under **Section 3.11.1**, including the implementation of BMPs and stormwater controls as required to comply with permits, the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality during its construction or operation. The impact would be ***less than significant***.

Figure 3-3
Existing Floodplains

Source: FEMA, 2024; RS&H, 2024.

3.11.5.2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin

As previously stated, groundwater has been encountered at no less than 100 feet bgs and the Proposed Project would not require excavation deeper than 65 feet bgs for pilings for the foundation of the new ATCT facility. Therefore, it is unlikely that groundwater would be encountered during construction.

Operation of the Proposed Project would result in a minor increase in impervious surface area due to the existing landscaped area in the parking lot of the ATCT being paved over to construct the new ATCT at that location. However, this increase in impervious surface area would be minor and would not result in a substantial decrease in infiltration that currently may occur within the project study area. Additionally, the Proposed Project would be consistent with the General Plan policies, the Basin Plan, the UWMP, SDFCMP, and the Metropolitan Water Resources Management Plan. Therefore, the Proposed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The impact would be ***less than significant***.

3.11.5.3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

Result in substantial erosion or siltation on- or off-site

Construction of the Proposed Project would result in grading on the site which would expose native soils that could be subject to the effects associated with wind and water erosion unless adequate measures are taken to limit the transport of soils in surface water from the site to downstream locations. In accordance with regulations listed under **Section 3.11.1,** compliance with the NPDES CGP would occur during the construction phase. The NPDES CGP requires preparation of a construction SWPPP that identifies specific measures and BMPs to minimize the potential for erosion as well as capture sediment from construction runoff. These practices would limit the potential for substantial impacts to erosion and siltation during the construction phase.

The majority of the project study area is developed and impervious and following construction, the project study area would continue to be mostly impervious and not susceptible to erosion or siltation. The Proposed Project would not alter the existing drainage patterns of the site or increase the rate or amount of surface runoff in a manner which would result in substantial erosion or siltation on- or offsite. Therefore, the impact would be ***less than significant***.

Substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site

Ground-disturbing activities related to construction, such as grading, excavation, placing fill, and trenching, could temporarily change existing surface drainage patterns and increase the potential for flooding, particularly during storm events. To reduce the potential for effects from increased surface runoff, the Proposed Project would be required to comply with the SDFCMP and the NPDES CGP.

While there would be a slight increase in impervious surface area resulting from implementation of the Proposed Project, the existing onsite drainage patterns would be maintained and would continue to direct surface runoff to the stormwater system. Compliance with required regulations would reduce potential effects and the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or offsite. Therefore, the impact would be ***less than significant***.

Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

The Proposed Project would result in a minor increase in impervious surface area in the project study area. However, with implementation of a SWPPP and compliance with the SDFCMP and the NPDES CGP, the potential for construction to result in substantial additional polluted runoff would be reduced.

The minor increase in impervious surface area resulting from the Proposed Project would not result in a substantial increase in runoff from the project study area. Compliance with the MS4 and project SWPPP would reduce the potential for the Proposed Project to create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the impact would be ***less than significant***.

Impede or redirect flood flows

Title 40 of the Code of Federal Regulations, Part 60 regulations (40 CFR 60), and the floodplain ordinance of the City of Fresno (Fresno Municipal Code Chapter 11, Article 6) require that placement and flood provision structures within a floodplain not result in a cumulative change in the floodplain water surface that exceeds one foot. In addition, the regulations under 40 CFR 60 do not allow placement of structures within a regulatory floodway unless that placement would not result in any increase in the floodplain water surface elevation, meaning that there is no displacement or redirection of the floodway. The City's floodplain ordinance requires that a registered Civil Engineer in the State of California certify that no displacement of floodwater would result from the flood proofing of a structure within a floodplain or a regulatory floodway. The project study area is not located within the 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) (Federal Emergency Management Agency, 2024b). The Proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. Therefore, there would be ***no impact***.

3.11.5.4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation

The project study area is not within a tsunami hazard area as mapped by CGS (California Geological Survey, 2009), and the closest body of water capable of producing a seiche is located approximately 7.8 miles northeast of the project study area. Therefore, the Proposed Project is not in flood hazard, tsunami, or seiche zones, and is not at risk to release of pollutants due to project inundation. There would be ***no impact***.

3.11.5.5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

Fresno is located within the Kings Sub-basin, which is part of the larger San Joaquin Valley Groundwater Basin. The planning documents regarding water resources for the city include the North Kings Groundwater Sustainability Act (GSA) Groundwater Management Plan, the City of Fresno Urban Water Management Plan, and City of Fresno Metropolitan Water Resources Management Plan. The Proposed Project would be required to adhere to NPDES drainage control requirements during construction and operation as well as to FMFCD drainage control requirements. As a result, the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or groundwater management plan. Therefore, there would be ***no impact***.

3.12 Land Use and Planning

This section describes the existing setting related to land use and planning based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.12.1 Regulatory Setting

3.12.1.1 Federal

The Airport and Airway Improvement Act of 1982

The Airport and Airway Improvement Act of 1982, as amended, states that no airport project receiving federal funding may be approved unless the Secretary of Transportation receives written assurances that the project will be consistent with existing land use plans and will not "…restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including the landing and takeoff of aircraft."

Airport Improvement Program

The Airport Improvement Program, like the Airport and Airway Improvement Act of 1982, as amended, also states that no airport project receiving federal funding may be approved unless the Secretary of Transportation receives written assurances that the project will be consistent with existing land use plans.

3.12.1.2 State

California Airport Noise Standards

The California Airport Noise Standards, set forth in Title 21 CCR Section 5000 et seq., state that no airport shall operate "with a noise impact area based on the standard of 65 decibels (dB) Community Noise Equivalent Level (CNEL) unless the operator has applied for or received a variance" from Caltrans permitting such operations (21 CCR Section 5012). The noise impact area is defined as incompatible land use within the 65 dB CNEL contour as described in Title 21 CCR Section 5014. See **Section 3.14, Noise** for more detail of the 65 dB CNEL contour.

California Department of Transportation

The *California Airport Land Use Planning Handbook*, published by Caltrans, establishes statewide guidelines for carrying out airport land use compatibility planning pursuant to the State Aeronautics Act (Public Utilities Code, Section 21670 et seq.). The State Aeronautics Act promotes compatibility between airport operations and the land use and development surrounding California's public use airports.

The Handbook serves to: (1) provide information to airport land use commissions, their staffs, airport proprietors, cities, counties, consultants, and the public; (2) identify therequirements and procedures for preparing effective compatibility planning documents; and (3) define exemptions where applicable. Additionally, the Handbook, which corresponds with current federal and state law regarding significance thresholds for incompatible land uses, also functions as a resource for the preparation, adoption, and amendment of airport land use compatibility plans.

3.12.1.3 Regional and Local

City of Fresno General Plan

The City of Fresno General Plan Urban Form, Land Use, and Design Element includes the following policies relating to land use and planning:

- **Policy UF-1-c: Identifiable City Structure.** Focus integrated and ongoing planning efforts to achieve an identifiable city structure, comprised of a concentration of buildings, people, and pedestrian-oriented activity in Downtown; along a small number of transit-oriented, mixed-use corridors and strategically located Activity Centers; and in existing and new neighborhoods augmented with parks and connected by multi-purpose trails and tree lined bike lanes and streets.
- **Policy LU-1-a: Promote Development within the Existing City Limits as of December 31, 2012.** Promote new development, infill, and rehabilitation of existing building stock in the Downtown Planning Area, along BRT corridors, in established neighborhoods generally south of Herndon Avenue, and on other infill sites and vacant land within the City.
- **Policy LU-1-c: Provision of Public Facilities and Services.** Promote orderly land use development in pace with public facilities and services needed to serve development.
- **Policy LU-2-a: Infill Development and Redevelopment.** Promote development of vacant, underdeveloped, and re-developable land within the City Limits where urban services are available by considering the establishment and implementation of supportive regulations and programs.
- **Policy LU-2-d: Infrastructure Upgrades.** Facilitate urban infill by building and upgrading community and neighborhood public infrastructure and services to enhance public health and convenience, and improve the overall experience and quality of city living.
- **Policy LU-8-d: Public Facilities and Institutions Meeting City Standards.** Request that federal, State, and local agencies locating public facilities and institutions in the City or designated growth area, meet City standards for public streets and sidewalks, access, parking, water supply, wastewater disposal, landscaping, and amenities.

City of Fresno Municipal Code

Chapter 15 of the City of Fresno Municipal Code provides guidance for the physical development within the city to comply with the land uses identified in the approved General Plan. Chapter 15 identifies land use categories, boundaries, and development standards.

3.12.2 Significance Thresholds

Significant impacts related to land use and planning would occur if implementation of the Proposed Project would result in any of the following:

a) Physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.12.3 Methodology

The analysis of potential impacts related to land use and planning was performed by reviewing regulations, policies, maps, and plans to determine land use consistency.

3.12.4 Existing Conditions / Environmental Setting

The project study area is designated for airport uses in the General Plan (City of Fresno, 2014a) and is located within Industrial and Public and Semi-Public zoning districts which allows for airport uses (City of Fresno, 2019b).

3.12.5 Environmental Impacts and Mitigation

3.12.5.1 Physically divide an established community

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside of the community.

The project study area is located on Airport property, adjacent to other Airport facilities. The Proposed Project would include the relocation of the existing ATCT by about 250 feet. These improvements would not affect connectivity and would not divide an established community. Therefore, the Proposed Project would not physically divide an established community. There would be ***no impact***.

3.12.5.2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

The Proposed Project would not require a change to the General Plan land use designation or the current zoning and would be consistent with the City's General Plan and Zoning Ordinance. Additionally, the Proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. There would be ***no impact***.

3.13 Mineral Resources

This section describes the existing setting related to mineral resources based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.13.1 Regulatory Setting

3.13.1.1 Federal

There are no federal statutory or regulatory requirements that apply to mineral resources.

3.13.1.2 State

Surface Mining and Reclamation Act of 1975 (SMARA)

The Surface Mining and Reclamation Act of 1975 (SMARA) requires the California Department of Conservation's State Mining and Geology Board to map areas throughout the state that contain regionally significant mineral resources. The primary objective of SMARA is to ensure local jurisdictions develop policies that support the conservation of important mineral resources, where feasible, that might otherwise be unavailable when needed. Once these policies are adopted, SMARA requires that local agencies make land use decisions in accordance with their mineral resource management policies. These decisions must also balance the value of the mineral resource to the market region as a whole, not just its importance to the local jurisdiction.

In accordance with SMARA, the state established the California Mineral Land Classification System to help identify and protect mineral resources in areas that are subject to urban expansion or other irreversible land uses that would preclude mineral extraction. Many areas of the state have been mapped using this classification system, which provides guidance for identifying Mineral Resource Zones (MRZs) based on these four general categories:

- MRZ-1. Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2. Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- MRZ-3. Areas containing mineral deposits, the significance of which cannot be evaluated.
- MRZ-4. Areas where available information is inadequate for assignment to any other zone.

3.13.1.3 Regional and Local

City of Fresno General Plan

They City of Fresno Resource Conservation and Resilience Element includes the following relevant policy relating to the mineral resources:

- **Policy RC-10-d, Manage MRZ-2 Areas.** Restrict land uses and development activities that would prevent mineral extraction in areas identified as MRZ-2—potentially valuable mineral resource zones—by the California Department of Conservation's Division of Mines and Geology.

3.13.2 Significance Thresholds

Significant impacts related to mineral resources would occur if implementation of the Proposed Project would result in any of the following:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

3.13.3 Methodology

Impacts associated with mineral resources were evaluated based on mineral resource zones classified by the SMARA.

3.13.4 Existing Conditions / Environmental Setting

The principal area for mineral resources in the city of Fresno is located along the San Joaquin River Corridor. The California Department of Mines and Geology classifies lands along the San Joaquin River Corridor as MRZ 1, MRZ-2, and MRZ-3. The project study area is not located in the vicinity of the San Joaquin River, and, as shown in the Mineral Resource Map for the City of Clovis General Plan, is not an MRZ and does not contain an MRZ (City of Clovis, 2014).

3.13.5 Environmental Impacts and Mitigation

3.13.5.1 Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state

There are no known mineral resources within or near the project study area. The Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the state. There would be ***no impact***.

3.13.5.2 Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan

The Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, the Proposed Project would have ***no impact***.

3.14 Noise

This section describes the existing setting related to noise based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures for the Proposed Project at FAT.

3.14.1 Background

Information presented in this section is based on the characteristics of noise (i.e., unwanted sound), the effects noise has on persons and communities, and the metrics or descriptors most commonly used to quantify environmental noise from aircraft and road traffic. Sound consists of minute vibrations (waveforms) that travel through a medium, such as air. Noise is sound that Is unwelcome because of its undesirable effects on persons (e.g., speech interference, sleep disturbance) or on entire communities (annoyance).

Noise metrics are measures of noise levels or noise exposure. There are two main categories of metrics to describe noise: (1) noise events (single-event noise metrics) and (2) noise experienced over durations (cumulative noise metrics). Single-event noise metrics are indicators of the intrusiveness, loudness, or noisiness of individual events. Cumulative noise metrics are indicators of community annoyance.

In general, humans find a change in sound level of 3 dB as “just perceptible,” a change of 5 dB as “clearly perceptible,” and a change of 10dB is perceived as twice (or half) as loud (Murphy & King, 2014). Because of the logarithmic scale of the decibel units, two sounds of equal physical intensity will result in the sound level increasing by 3 dB, regardless of the initial sound level. For example, 60 dB plus 60 dB equals 63 dB, and 80 dB plus 80 dB equals 83 dB.

The A-weighted sound level (dBA) is commonly used when measuring environmental noise to provide a single number descriptor that correlates with human subjective response to noise because the sensitivity of human hearing varies with frequency. The A-weighted sound level is widely accepted by acousticians as a proper unit for describing environmental noise. Most environmental noise (and the A-weighted sound level) fluctuates from moment to moment, and it is common practice to characterize the fluctuating level by a single number, the Equivalent Sound Level, abbreviated L_{eq}. The L_{eq} is the value or level of a steady, non-fluctuating sound that represents the same sound energy as the actual time-varying sound evaluated over the same time period.

Maximum sound level (L_{max}) is the maximum or peak sound level during a noise event. This metric accounts for the instantaneous peak intensity of the sound, and not for the duration of the event. As a vehicle or aircraft passes by an observer, the sound level increases to a maximum level and then decreases. Ambient noise in metropolitan, urbanized areas typically varies within a range of 60 to 70 dB while quiet, suburban neighborhoods typically experience ambient noise levels within a range of 45 to 50 dB. The contribution of outdoor noise to indoor noise levels is usually small. That part of a sound level within a building caused by an outdoor source depends on the source's intensity and the sound level reduction afforded by the building; the sound level reduction of a building is largely determined by whether its windows are open or closed (U.S. Environmental Protection Agency, 1978). **Table 3-11** displays common environmental sound levels from a variety of sources.

Table 3-11: Common Outdoor and Indoor Noise Levels

Outdoor Sound Level	Noise Level (decibels [dBA])	Indoor Sound Level
	110	Rock Band at 5 meters (m) (16 feet [ft])
Jet Over-Flight at 300 m (1,000 ft)	105	
	100	Inside New York Subway Train
Gas Lawn Mower at 1 m (3 ft)	95	
	90	Food Blender at 1 m (3 ft)
Diesel Truck at 15 m (50 ft)	85	
Noisy Urban Area – Daytime	80	Garbage Disposal at 1 m (3 ft)
	75	Shouting at 1 m (3 ft)
Gas Lawn Mower at 30 m (100 ft)	70	Vacuum Cleaner at 3 m (10 ft)
Suburban Commercial Area	65	Normal Speech at 1 m (3 ft)
	60	
Quiet Urban Area – Daytime	55	Quiet Conversation at 1 m (3 ft)
	50	Dishwasher in Next Room
Quiet Urban Area at Night	45	
	40	Empty Theater or Library
Quiet Suburb at Night	35	
	30	Quiet Bedroom at Night
Quiet Rural Area at Night	25	Empty Concert Hall
Rustling Leaves	20	
	15	Broadcast and Recording Studios
	10	Threshold of Hearing
	0	

Source: AASHTO Center for Environmental Excellence (Federal Highway Administration, 2024)

Cumulative noise metrics assess community response to noise by including loudness, duration, time of day a noise event occurs, and the total number of noise events in one single number rating scale. The Day-Night Average Sound Level (DNL or Ldn) represents the noise energy present during a 24-hour period. Weighting is applied to noise events occurring at night (10:00 p.m. to 7:00 a.m.), with 10 dB added to the actual nighttime sound level. This 10-dB weighting accounts for greater sensitivity to nighttime noise, and the fact that events at night are often perceived to be more intrusive than daytime events.

CNEL is the standard metric used in California to represent cumulative noise exposure. The metric provides a single-number description of the weighted sound energy to which a person or community is exposed over a period of 24 hours, like DNL. However, CNEL includes weighting applied to noise events occurring during the evening hours between 7:00 p.m. and 10:00 p.m., with 4.8 dB added to the actual sound level in addition to the nighttime events occurring

between 10:00 p.m. and 7:00 a.m. The evening weighting is the only difference between CNEL and DNL.

3.14.2 Regulatory Setting

3.14.2.1 Federal

Federal Aviation Regulations, Part 36

Federal Aviation Regulations (FAR), Part 36, "Noise Standards: Aircraft Type and Airworthiness Certification," sets noise standards for issuance of new aircraft type certificates. Aircraft are certified as Stage 1 through Stage 5 depending on their noise level, weight, and number of engines. Stage 1 and Stage 2 aircraft, which are the noisiest aircraft, are no longer permitted to operate in the continental United States. Although aircraft meeting Part 36 standards are noticeably quieter than many of the older aircraft, the regulations make no determination that such aircraft are acceptably quiet for operations at any given airport.

Federal Aviation Noise Abatement Policy

The Federal Aviation Noise Abatement Policy establishes the noise abatement authority and responsibilities of the federal government, airport proprietors, state and local governments, air carriers, air travelers, shippers, and airport area residents and prospective residents. It emphasizes that the FAA's role is primarily one of regulating noise and its source (the aircraft), plus supporting local efforts to develop airport noise abatement plans. The FAA gives high priority in the allocation of Airport Development Aid Program (ADAP) funds to projects designated to ensure compatible use of land near airports, but it is the role of state and local governments and airport proprietors to undertake the land use and operational actions necessary to promote compatibility.

Aviation Safety and Noise Abatement Act of 1979

The Aviation Safety and Noise Abatement Act of 1979 establishes funding for noise compatibility planning and sets the requirements by which airport operators can apply for funding. This is also the law by which Congress mandated that the FAA develop and airport community noise metric to be used by all federal agencies assessing or regulating aircraft noise. The result was DNL. Because California already had a well-established airport community noise metric in CNEL, and because CNEL and DNL are so similar, the FAA expressly allows CNEL to be used in lieu of DNL in noise assessments performed for California airports. The Aviation Safety and Noise Abatement Act does not require an airport to develop a noise compatibility program, rather, that is accomplished through the Code of Federal Regulations (CFR) Part 150. CFR Part 150 sets forth standards for airport operators to use when documenting noise exposure around airports and for establishing programs, subject to FAA approval, to reduce noise-related noncompatible land use.

Airport Noise and Capacity Act of 1990

The Airport Noise and Capacity Act of 1990 (ANCA) sets forth several provisions related to the regulation of aircraft activities at airports. One of the most notable aspects of ANCA is that it precludes the local imposition of noise and access restrictions that are not otherwise in accordance with the national noise policy unless the restrictions are "grandfathered" under

ANCA, in which case the restrictions are free from the limits that ANCA otherwise would impose. ANCA established two broad directives to the FAA: (1) establish a method to review aircraft noise, airport use, or airport access restrictions proposed by airport proprietors; and (2) institute a program to phase-out Stage 2 aircraft over 75,000 pounds by December 21, 1999. ANCA applies to all new local noise restrictions and amendments to existing restrictions proposed after October 1990.

Vibration: Federal Transit Administration

The Federal Transit Administration (FTA) has developed ground borne vibration criteria based on land use and building use. These criteria, shown in **Table 3-12** and **Table 3-13**, are based on vibration levels expressed in peak particle velocity in inches per second (PPV in/sec) and vibration decibels (VdB) for construction to assess the level of potential annoyance.

Table 3-12: Federal Vibration Damage Thresholds of Significance for Land use

Building Category	PPV in/sec
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV in/sec: peak particle velocity in inches per second
Source: Transit Noise and Vibration Impact Assessment Manual (Federal Transit Administration, 2018)

Table 3-13: Federal Vibration Annoyance Thresholds of Significance for Land Use

Land Use Category	Vibration Impact Level for Frequent Events (VdB)	Vibration Impact Level for Infrequent Events (VdB)
Category 1: Buildings where low ambient vibration is essential for interior operations	65	65
Category 2: Residences and buildings where people normally sleep	72	80
Category 3: Institutional land uses with primarily daytime use	75	83

VdB: vibration decibels
Source: Transit Noise and Vibration Impact Assessment Manual (Federal Transit Administration, 2018)

3.14.2.2 State

California Department of Transportation (Caltrans)

California's State Aeronautics Act, at Division 9, titled "Regulation of Airports," provides in part that "The department [of Transportation] shall adopt noise standards governing the operation of aircraft and aircraft engines for airports operating under a valid permit issued by the department to the extent not prohibited by federal law. The standard shall be based upon the level of noise acceptable to a reasonable person residing in the vicinity of the airport" (California Public Utilities Code § 21669). In turn, Caltrans Division of Aeronautics has adopted Noise Standards at Title 21 CCR, Section 5000 et seq. Those "regulations establish to the extent not prohibited by Federal law a mandatory procedure which is applicable to all airports in California that are

required to operate under a valid permit issued by the department. These regulations are applicable (to the extent not prohibited by federal law) to all operations of aircraft and aircraft engines which produce noise" (21 CCR § 5005). The Noise Standards mandate the use of CNEL as the required noise metric, which is also accepted by the FAA for airport noise studies in California (Federal Aviation Administration, 2006). The Noise Standards set the airport noise standard at 65 CNEL, and require airports designated as "noise problem" airports such as the Airport to undertake certain reporting requirements. The regulations also state that "No airport proprietor of a noise problem airport shall operate an airport with a noise impact area based on the standard of 65 dB CNEL unless the operator has applied for or received a variance as prescribed in Article 5 of this subchapter" (21 CCR § 5012). The "Noise Impact Area" in turn is defined as "the area within the noise impact boundary [65 CNEL] that is composed of incompatible land use," and incompatible land uses, such as dwellings or schools (with certain exceptions such as if they are acoustically treated to an interior CNEL of 45 dB or less or are subject to an avigation easement) are described in the Noise Standards (21 CCR § 5001(k), 5014).

3.14.2.3 Regional and Local

Airport Land Use Compatibility Plan

The California State Aeronautics Act (Public Utilities Code Sections 21001 et seq.) requires the preparation of a compatibility plan for each public-use and military airport in the state. The ALUCP promotes compatibility between airports and land uses that surround them to the extent that these areas are not already devoted to incompatible uses.

Most counties within California have established an ALUC, as provided for by law, to prepare compatibility plans for the airports in the county and to review land use plans, development proposals, and certain airport development plans for consistency with the compatibility plan. The Fresno County ALUC is an independent body of seven commissioners created in response to the mandates of the State Aeronautics Act.

The ALUCP serves as a tool for the ALUC to use in fulfilling its duty to review land use plans and development proposals within the Airport Influence Area (AIA) of the Airport. Further, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans, specific plans, zoning ordinances and building regulations as well as to landowners in their design of new development.

The Fresno County ALUCP was adopted by the ALUC of Fresno County on December 3, 2018 (Fresno County Airport Land Use Commission, 2018).

City of Fresno General Plan

The following objectives and policies from the General Plan Noise and Safety Element are applicable to the Proposed Project.

- **NS-1-a Desirable and Generally Acceptable Exterior Noise Environment.** Establish 65 dBA L_{dn} or CNEL as the standard for the desirable maximum average exterior noise levels for defined usable exterior areas of residential and noise-sensitive uses for noise, but designate 60 dBA L_{dn} or CNEL (measured at the property line) for noise generated by stationary sources impinging upon residential and noise-sensitive uses. Maintain

65 dBA L_{dn} or CNEL as the maximum average exterior noise levels for non-sensitive commercial land uses, and maintain 70 dBA L_{dn} or CNEL as maximum average exterior noise level for industrial land uses, both to be measured at the property line of parcels where noise is generated which may impinge on neighboring properties.

- **NS-1-j Significance Threshold.** Establish, as a threshold of significance for the City's environmental review process, that a significant increase in ambient noise levels is assumed if the project would increase noise levels in the immediate vicinity by 3 dB L_{dn} or CNEL or more above the ambient noise limits established in this General Plan Update.
- **NS-1-k Proposal Review.** Review all new public and private development proposals that may potentially be affected by or cause a significant increase in noise levels, per Policy NS-1-i, to determine conformance with the policies of this Noise Element. Require developers to reduce the noise impacts of new development on adjacent properties through appropriate means.
- **NS-1-n Best Available Technology.** Require new noise sources to use best available control technology to minimize noise emissions.
- **NS-1p Airport Noise Compatibility**. Implement the land use and noise exposure compatibility provisions of the adopted Fresno Yosemite International Airport Land Use Compatibility Plan, the Fresno-Chandler Executive Airport Master and Environs Specific Plan, and the Sierra Sky Park Land Use Policy Plan to assess noise compatibility of proposed uses and improvements within airport influence and environs areas.

City of Fresno Municipal Code

Chapter 10 Article 1 of the Fresno Municipal Code is referred to as the “Noise Ordinance of the City of Fresno” and provides guidelines and exemptions relating to excessive noise (City of Fresno, 2024g).

- **Section 10-102 (b) Ambient Noise.** "Ambient noise" is the all-encompassing noise associated with a given environment, being usually a composite of sounds from many sources near and far. For the purpose of this ordinance, ambient noise level is the level obtained when the noise level is averaged over a period of fifteen minutes, without inclusion of the offending noise, at the location and time of day at which a comparison with the offending noise is to be made. Where the ambient noise level is less than that designated in this section, the noise levels specified in **Table 3-14** shall be deemed to be the ambient noise level for that location.
- **Section 10-105: Excessive Noise Prohibited.** No person shall make, cause, or suffer or permit to be made or caused upon any premises or upon any public street, alley, or place within the city, any sound or noise which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing or working in the area, unless such noise or sound is specifically authorized by or in accordance with this article. The provisions of this section shall apply to, but shall not be limited to, the control, use, and operation of the following noise sources:

Table 3-14: Ambient Noise Levels

District	Time	Sound Level Decibels
Residential	10 p.m. to 7 a.m.	50
Residential	7 p.m. to 10 p.m.	55
Residential	7 a.m. to 7 p.m.	60
Commercial	10 p.m. to 7 a.m.	60
Commercial	7 a.m. to 10 p.m.	65
Industrial	Anytime	70

Source: City of Fresno Municipal Code (City of Fresno, 2024g)

(e) Radios, musical instruments, phonographs, television sets, or other machines or devices used for the amplification, production, or reproduction of sound or the human voice.

(f) Animals or fowl creating, generating, or emitting any cry or behavioral sound.

(g) Machinery or equipment, such as fans, pumps, air conditioning units, engines, turbines, compressors, generators, motors or similar devices, equipment, or apparatus.

(h) Construction equipment or work, including the operation, use or employment of pile drivers, hammers, saws, drills, derricks, hoists, or similar construction equipment or tools.

- **Section 10-109 Exceptions.** The provisions of this article shall not apply to:

(a) Construction, repair or remodeling work accomplished pursuant to a building, electrical, plumbing, mechanical, or other construction permit issued by the city or other governmental agency, or to site preparation and grading, provided such work takes place between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday.

(b) Emergency work.

(c) Any act or acts which are prohibited by any law of the State of California or the United States. (Added Ord. 72-163, 1972; Am. Ord. 80-171, § 74, eff. 12-26-80).

3.14.3 Significance Thresholds

Significant impacts related to noise would occur if implementation of the Proposed Project would result in any of the following:

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b) Generate excessive groundborne vibration or groundborne noise levels.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public

use airport, expose people residing or working in the project area to excessive noise levels.

3.14.4 Methodology

The Proposed Project would not result in any changes to aircraft operations (takeoffs and landings), runway configuration, arrival/departures procedures, or runway use percentages. Therefore, there would be no change in aircraft noise exposure and no aircraft noise analysis is required.

The Proposed Project would replace an existing facility with no expansion of use at a location within the parcel of land, on Airport property. The Proposed Project would, therefore, not result in operational noise impacts, including vehicle traffic, and implementation of the Proposed Project would not result in any change in operational noise at or near FAT. As such, the analysis is focused on the potential for construction-related noise impacts.

The analysis of noise and ground-borne vibration from construction activities such as paving, excavation, pile driving, and hauling noise exposure effects at nearby noise-sensitive land uses included the following methods:

- Identifying the construction equipment necessary to construct the Proposed Project.
- Using industry accepted data sources to determine the noise and vibration levels of each type of equipment.
- Determining the location of the noise-sensitive land uses or receptors nearest to the construction area.
- Applying standard noise attenuation factors (i.e., 6 dB per doubling of distance from stationary noise sources) to determine potential impact conditions at sensitive receptors.
- Comparing the resulting noise and vibration levels to applicable guidelines and regulations.
- Including multiple construction equipment at the same time throughout each year.

Project-generated construction source noise and vibration levels were determined based on methodologies, reference emission levels, and usage factors from FTA's *Transit Noise and Vibration Impact Assessment Manual* (Federal Transit Administration, 2018) and FHWA's Construction Noise Handbook (Fededral Highway Administration, 2006).

3.14.5 Existing Conditions / Environmental Setting

The project study area is located entirely on Airport property and noise sources in the area are primarily associated with that of an airport, including aircraft. Existing land uses in the vicinity of the project study area include Airport uses. The nearest residences and school are located approximately 0.5 miles west of the project study area. A hotel, the Wyndham Garden Fresno Yosemite Airport Hotel, is located approximately 800 feet southwest of the project study area along East Clinton Avenue.

3.14.6 Environmental Impacts and Mitigation

3.14.6.1 Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards

A temporary increase in noise generation would be expected with construction and demolition activities over the two-year construction period associated with the Proposed Project. Additional noise sources would likely include the presence and operation of construction vehicles, operation of construction/demolition equipment on site, the operation of generators as a power source, and the operation of vehicles using the haul routes to and from the construction site. Construction of the Proposed Project would result in varying levels of noise generation subject to change based on the construction intensity and distance to a given receptor.

Construction noise is temporary in nature and the nearest noise sensitive land uses are approximately 0.5 miles away (2,640 feet). In addition, construction noise typically dissipates at a rate of approximately 6 dB for each doubling of distance (between the noise source and the receptor, which is the location that is representative of where the sound would be experienced (e.g., a residence)) (Federal Highway Administration, 2006). As an example, the anticipated loudest piece of construction equipment, a pile-driver, generates a noise level of approximately 101 dBA at 50 feet from the noise source (Federal Transit Administration, 2018). Based on a sound dissipation rate of 6 dB per doubling of distance, a sound level of 101 dBA at 50 feet from the noise source would be approximately 95 dBA at a distance of 100 feet, 89 dBA at a distance of 200 feet, and so on. Therefore, a pile-driver that is 101 dBA from 50 feet away, would be 71 dB at 1,600 feet and 65 dB at 3,200 feet. Due to the distance from the closest sensitive noise receptor, this noise level would not likely be perceptible over typical ambient noise levels of the Airport.

The haul routes accessing the project site (Clinton Avenue, Chestnut Avenue, Peach Avenue, and Shields Avenue) are arterial roadways with noise levels above 60 dB L_{dn} (City of Fresno, 2014a). The maximum number of construction-related vehicles on these roadways is estimated to be a total of 73 trips on any given day, which represents a fraction of the existing traffic volumes. Therefore, no surface traffic noise effects would be anticipated.

Additionally, as set forth in Chapter 10, Article 1 (Noise Regulations) of the Fresno Municipal Code, Section 10-109 – Exemptions, the provisions of Article 1, Noise Regulations, shall not apply to construction, repair or remodeling work accomplished pursuant to a building, electrical, plumbing, mechanical, or other construction permit issued by the city or other governmental agency, or to site preparation and grading, provided such work takes place between the hours of 7:00 a.m. and 10:00 p.m. on any day except Sunday. However, Chapter 10, Article 1 does identify the opportunity for the issuance of a permit to exempt construction work completely if an application to do so is approved. As such, construction of the Proposed Project that requires site preparation and grading (including demolition) would be limited to Monday through Saturday between 7:00 a.m. and 10:00 p.m. unless a permit to work outside of those hours is obtained.

Operation of the Proposed Project would not result in a change in aircraft noise exposure or surface traffic. Additionally, the Proposed Project would not result in any operational noise effects beyond what exists currently in the project study area. Therefore, the Proposed Project

would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, State, or federal standards. The impact would be ***less than significant***.

3.14.6.2 Generate excessive groundborne vibration or groundborne noise levels

Construction of the Proposed Project may cause vibration impacts due to the use of certain construction equipment. As previously stated, the nearest sensitive receptors to construction activities are approximately 0.5 miles away (2,640 feet). The most vibration-intensive piece of equipment is anticipated to be a pile-driver, which is estimated to have a source vibration level of 0.644 PPV in inches per second at 25 feet according to FTA (Federal Transit Administration, 2018). Assuming that the nearest sensitive receptors are residences that would fall into Category III, non-engineered timber and masonry buildings, shown in **Table 3-12**, the impact criterion would be 0.2 PPV inches per second. Using the FTA evaluation criteria, vibration from the pile-driver would attenuate to less than 0.2 PPV at approximately 250 feet. Because the nearest sensitive receptors are more than 250 feet away, no construction damage impact would occur. Similarly, vibration annoyance impacts are not anticipated because the source level of the pile-driver is 104 VdB according to FTA at 25 feet and would attenuate to the annoyance impact criterion level of 72 VdB at approximately 300 feet. Because the nearest sensitive receptors are further away than this no impact is predicted.

Therefore, the Proposed Project would not generate excessive groundborne vibration or groundborne noise levels and the impact is ***less than significant***.

3.14.6.3 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels

The project study area is located entirely on Airport property. The Proposed Project includes the relocation of an existing Airport facility and would not result in any changes to aircraft operations. Therefore, the Proposed Project would not result in any changes to operational noise levels. Noise levels would be similar to existing levels, which are typical for an active public airport. The impact would be ***less than significant***.

3.15 Population and Housing

This section describes the existing setting related to population and housing based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.15.1 Regulatory Setting

3.15.1.1 Federal

There are no federal statutory or regulatory requirements that apply to population and housing.

3.15.1.2 State

California Housing Element Law

Since 1969, California law has required cities and counties to plan for housing across all income levels. This is done through the housing element of their general plan. To meet housing demand, the Housing Element Law ensures that local governments create policies that enable housing development without unnecessary barriers.

Planning and Zoning Law, California Government Code, Section 65584.

The Planning and Zoning Law mandates that local councils of governments (or the Department of Housing and Community Development, in the absence of a local council of government) prepare a Regional Housing Needs Assessment for all counties and cities within state. State law requires that cities and counties provide a certain amount of housing to accommodate the demands of the growing population.

3.15.1.3 Regional and Local

City of Fresno General Plan

The City of Fresno General Plan Urban Form, Land Use and Design Element includes the following policies relating to population and housing:

- **Policy UF-1-c: Identifiable City Structure.** Prioritize coordinated, continuous planning to shape a clear city form, featuring a vibrant Downtown hub with dense buildings, active pedestrian zones, and people-centered spaces. Develop a few key transit-linked, mixed-use corridors and targeted Activity Centers. Enhance both existing and future neighborhoods with parks, green streets, and an interconnected network of trails and tree-lined bike lanes.
- **Policy UF-1-d: Range of Housing Types.** Promote a mix of architectural styles, building sizes, and development densities to strengthen the character of each neighborhood. This approach supports diverse market choices for housing and employment, accommodates various income levels, and expands access to affordable living options across the city.

Fresno Multi-Jurisdictional Housing Element

The City of Fresno adopted the Fresno Multi-Jurisdictional 2023-2031 Housing Element on December 12,2024. The element includes the following goals with policies to support:

- Goal 1: Facilitate and encourage the provision of a range of housing types to meet the diverse needs of residents
- Goal 2: Encourage and facilitate the development of affordable housing
- Goal 3: Improve and maintain the quality of housing and residential neighborhoods
- Goal 4: Provide a range of housing types and services to meet the needs of individuals and households with special needs
- Goal 5: Affirmatively Furthering Fair Housing (Government Code Section (65583(C)(C)(5) & (10) by securing safe, sanitary, and affordable housing for all members of the community regardless of race, sex, or other factors
- Goal 6: Encourage energy efficiency in all new and existing housing

3.15.2 Significance Thresholds

Significant impacts related to population and housing would occur if implementation of the Proposed Project would result in any of the following:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.15.3 Methodology

Information regarding the current population and housing within the and near the project study area was evaluated with the components of the Proposed Project to determine any potential impacts.

3.15.4 Existing Conditions / Environmental Setting

The project study area is located entirely on Airport property, which is designated for airport use by the General Plan and belongs to the Industrial and Public and Semi-Public zoning districts, which allow for airport development. No residences or commercial facilities are located within the project study area.

3.15.5 Environmental Impacts and Mitigation

3.15.5.1 Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)

The Proposed Project would include the relocation of the existing ATCT by about 250 feet. The project study area is designated for airport use by the General Plan and belongs to the Industrial and Public and Semi-Public zoning districts, which allow for airport development.

The Proposed Project would not result in direct population growth as the use proposed is not residential and would not contribute to permanent residency onsite. Therefore, the Proposed

Project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) and there would be ***no impact***.

3.15.5.2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere

The Proposed Project is located on Airport property and would not necessitate the displacement or removal of existing housing. Therefore, the Proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere and there would be ***no impact***.

3.16 Public Services

This section describes the existing setting related to public services based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.16.1 Regulatory Setting

3.16.1.1 Federal

FAR Title 14, Part 139: Certification of Airports

Under FAR Title 14, Part 139 certification, airports must maintain ARFF capabilities on airport property. As described in FAR Part 139, FAA classifies airports by an Index Level "A" through "E" ranking system; each classification rank has different ARFF requirements that must be met. The index is determined by a combination of length of air carrier and average daily departures of air carrier aircraft. The Airport is classified as Index Level B because it includes aircraft at least 90 feet but less than 126 feet in length (14 CFR Part 139.315); however, FAT's firefighting capabilities are equal to an Index C airport.

FAR Title 49, Part 1540: Civil Aviation Security

FAR Title 49, Part 1540 establishes TSA, which has the responsibility to serve as the authority over civil aviation security for all aviation-related activities. Part 1540 identifies TSA's role in airport security that may work in conjunction with the responsibilities of an airport's law enforcement authority. FAR Part 1540 requires passenger and baggage screening for certified airports of OAK's size. TSA, under the authority of the Department of Homeland Security, provides oversight compliance in airport security screening measures for the Airport.

FAR Title 49, Part 1542: Airport Security

The FAA establishes requirements for airports to maintain an Airport Security Program under FAR Title 49, Part 1542 (49 CFR Part 1542). The Airport Security Program outlines the safety and security of persons and property against acts of criminal violence, aircraft piracy, and the introduction of unauthorized weapons, explosives, or incendiaries onto an aircraft. Oversight compliance is the responsibility of the TSA.

3.16.1.2 State

California Fire Code and Uniform Fire Code

The City of Fresno Municipal Code has adopted the 2022 California Fire Code and 44 CCR Part 9 2013 Edition, which is based on the 2021 International Fire Code and compiled by the California Building Standards Commission 24 CCR Part 9).These codes prescribe regulations consistent with nationally recognized standard practices safeguarding life, health, property, and public welfare to a reasonable degree from the hazards of fire and explosion.

3.16.1.3 Regional and Local

City of Fresno General Plan

The City of Fresno General Plan Public Utilities and Services Element includes the following policies relating to population and housing:

- **Policy PU-1-c: Safety Considerations in Development Approval.** Continue to identify and apply appropriate safety, design and operational measures as conditions of development approval, including, but not limited to, street access control measures, lighting and visibility of access points and common areas, functional and secure on-site recreational and open space improvements within residential developments, and use of State licensed, uniformed security.
- **Policy PU-3-d: Review Development Applications.** Continue Fire Department review of development applications, provide comments and recommend conditions of approval that will ensure adequate on-site and off-site fire protection systems and features are provided.
- **Policy PU-3-e: Building Codes.** Adopt and enforce amendments to construction and fire codes, as determined appropriate, to systematically reduce the level of risk to life and property from fire, commensurate with the City's fire suppression capabilities.

City of Fresno Municipal Code

City of Fresno Municipal Code Article 5, Fire Prevention, and Title 15.10, Fire Code, identifies the requirements for structures within the city of Fresno to meet fire requirements as well as other environmental protection considerations. The code also establishes the Fire Protection District to enforce the provisions of the code relating to physical security requirements for commercial buildings in the city.

3.16.2 Significance Thresholds

Significant impacts related to public services would occur if implementation of the Proposed Project would result in any of the following:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    - Fire protection
    - Police protection
    - Schools
    - Parks
    - Other public facilities

3.16.3 Methodology

The evaluation of potential impacts related to public services is based on comparisons of levels of service currently provided to projected service needs anticipated at FAT. The public services analyses focus on the potential need for additional staff and equipment, as applicable to each function, and whether such need would in turn necessitate construction of new or physically altered governmental facilities.

3.16.4 Existing Conditions / Environmental Setting

Existing services provided to the project study area include firefighting and emergency services provided through the City. The ARFF facility provides emergency fire services to the Airport and is located adjacent to the project study area. Police protection is provided by the City of Fresno Police Department with backup from the County Sheriff's Office. Emergency services operations out of the Airport include medical transport and wildland firefighting.

The school district that oversees the area in which the Airport is located is the Fresno Unified School District. The closest school to the project study area is Sierra Charter School, located about 0.5 miles southwest.

The closest park to the project study area is Reedy Park, which is about 1,000 feet southwest.

3.16.5 Environmental Impacts and Mitigation

3.16.5.1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection

There would be no change to fire protection services or need for additional fire protection services as a result of the Proposed Project. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. There would be ***no impact***.

Police protection

There would be no change to police protection services or need for additional police protection services as a result of the Proposed Project. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection. There would be ***no impact***.

Schools

The Proposed Project would occur at the Airport and would not generate student demand or otherwise affect school services given that there is no housing or a residential component. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for school. There would be ***no impact***.

Parks

The Proposed Project would not generate population growth that would result in an increase in the use of existing neighborhood and regional parks. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. There would be ***no impact***.

Other public facilities

Development of the Proposed Project would occur at the Airport and would not increase demand for other public services, including libraries, community centers, and public health care facilities. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. There would be ***no impact***.

3.17 Recreation

This section describes the existing setting related to recreation based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.17.1 Regulatory Setting

3.17.1.1 Federal

U.S. Department of Transportation Act, Section 4(f)

Section 4(f) of the U.S. DOT Act of 1966 (now codified at Title 49 USC § 303) provides protection for special properties, including publicly owned parks, recreation areas, wildlife and waterfowl refuges, and historic and archaeological sites. Section 4(f) of the U.S. DOT Act provides that: the Secretary of Transportation will not approve any program or project that requires the use of any publicly owned park, recreational area, or wildlife or waterfowl refuge of national, state, or local significance or land from a historic site of national, state, or local significance, as determined by the officials having jurisdiction thereof, unless there is no feasible and prudent alternative to the use of such land and such program, and the project includes all possible planning to minimize harm resulting from the use.

Land and Water Conservation Fund (LWCF) Act

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act (16 U.S.C. §§ 4601-4604 et seq.) protects lands that were either purchased or developed as recreational areas using LWCF funds. LWCF resources are managed by the U.S. National Park Service (U.S. NPS) and coordinated with each state. The U.S. NPS must approve projects that propose to acquire or convert Section 6(f) resources, including airport development projects, and the project proponent must replace any acquired or converted LWCF resources with lands that are equal to or greater in value, equivalent in recreational usefulness, and equivalent in location.

3.17.1.2 State

There are no relevant state statutory or regulatory requirements that apply to recreation.

3.17.1.3 Regional and Local

City of Fresno General Plan

The City of Fresno General Plan Parks and Open Space Element includes the following relevant policy relating to recreational resources:

- **Policy POSS-2-c: Review of Development Applications.** Coordinate review of all development applications (i.e., site plans, conditional use permits, and subdivision maps) in order to implement the parks and open space standards of this Plan.
    - Assure the provision of adequate active and passive open spaces and facilities as appropriate within residential subdivisions through Development Code requirements for mandatory dedication and improvement of land and/or development fees.

- Require the provision of appropriate outdoor living areas or private open space in multi-family residential developments not subject to the Subdivision Map Act.
- Request open space easements where feasible and warranted to secure appropriate public use of sensitive areas with scenic or recreation values, and for buffering space for sensitive areas.
- Require provision of appropriate open space areas in private projects, in the form of trails, enhanced landscaped setbacks, parks, and water features.
- Evaluate the merits of establishing a development bonus entitlement program in which development incentives (i.e., bonus densities, bonus floor area square footage) are provided for contributions to public recreational facilities on-site or in the vicinity of the development project.

Fresno Parks Vision 2050 (Fresno Parks Master Plan)

The Fresno Parks Master Plan was created in 2017 and amended in 2023 and articulates a vision for improving Fresno's park and open space system based on community engagement and thorough analysis Fresno Parks Vision 2050 an update of the master plan and is designed to enhance parks and open spaces throughout the city. It focuses on tackling challenges such as upkeep, areas lacking green space ("park deserts"), and expanding recreation options. A central goal of the plan is to promote fairness by guaranteeing that every neighborhood benefits from well-maintained parks and accessible leisure facilities.

3.17.2 Significance Thresholds

Significant impacts related to recreation would occur if implementation of the Proposed Project would result in any of the following:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.17.3 Methodology

The evaluation of potential impacts related to recreation is based on comparisons of levels of service currently provided to projected service needs anticipated at FAT. The recreation analyses focus on the potential need for recreational facilities and whether such need would in turn necessitate construction of new or physically altered recreation facilities.

3.17.4 Existing Conditions / Environmental Setting

The closest park to the project study area is Reedy Park, which is about 1,000 feet southwest. A private golf course is located to the north of the Airport. No other recreational facilities are within a quarter mile of the project study area.

3.17.5 Environmental Impacts and Mitigation

3.17.5.1 Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated

The Proposed Project includes relocating the ATCT by about 250 feet and would not generate population growth that would result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. Therefore, the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. There would be ***no impact***.

3.17.5.2 Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

The Proposed Project would not require the construction or expansion of existing public recreational facilities. Therefore, the Proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. There would be ***no impact***.

3.18 Transportation

This section describes the existing setting related to transportation based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.18.1 Regulatory Setting

3.18.1.1 Federal

There are no relevant federal statutory or regulatory requirements that apply to transportation impacts.

3.18.1.2 State

Senate Bill 743

State SB 743 was signed into law in September 2013 and was fully implemented as of July 1, 2020. SB 743 requires that relevant CEQA analysis of transportation impacts be conducted using a metric known as VMT instead of Level of Service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The State CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that, except with respect to transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, Level of Service measures of impacts on traffic facilities is no longer a relevant CEQA threshold for transportation impacts.

CEQA Guidelines Section 15064.3(b)(4) states that "[a] lead agency has discretion to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate used to estimate vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

3.18.1.3 Regional and Local

Fresno Council of Governments

The Fresno County Council of Governments (FCOG) is a collaborative body made up of 16 local government members, including the City of Fresno. As one of California's 18 MPOs, FCOG focuses on transportation planning and funding. Its core responsibilities include creating and implementing the RTP and SCS, both designed to help achieve California's climate goals by coordinating land use and transportation efforts. The 2022 RTP prioritizes five central policy themes: promoting equity, advancing sustainability and resilience, enhancing infrastructure and public safety, strengthening the economy, and encouraging innovation.

City of Fresno General Plan

The City of Fresno General Plan Mobility and Transportation Element includes the following relevant policies relating to transportation:

- **Policy MT-1-d, Integrate Land Use and Transportation Planning.** Develop and uphold a unified approach to land use, transportation, and local circulation that supports anticipated growth. Ensure this system minimizes disruption to surrounding properties and maintains the character of existing neighborhoods.
- **Policy MT-2-l, Transportation Impact Studies.** A Transportation Impact Study
- **Policy MT-2-m, Use VMT Analysis for CEQA.** As of July 2020, transportation impacts under the California Environmental Quality Act (CEQA) must be assessed using Vehicle Miles Traveled (VMT), in accordance with Senate Bill 743. While Level of Service (LOS) can still be applied for planning and Capital Improvement Project implementation, VMT is the required standard for identifying and addressing environmental mitigation needs under CEQA.
- **Policy MT-6-n, Emergency Vehicle Access along Paths and Trails.** Provide points of emergency vehicle access within the path and trail corridors, via parking areas, service roads, emergency access gates in fencing, and firebreaks

City of Fresno CEQA Guidelines for Vehicle Miles Traveled Thresholds

The City adopted CEQA Guidelines for Vehicle Miles Traveled Thresholds on June 25, ,2020 ((City of Fresno, 2020b) to address the shift in CEQA transportation and traffic analyses from LOS to VMT. The guidelines provide for standardized screening methods for VMT compliance; recommends appropriate VMT CEQA significance thresholds for development projects, transportation projects, and plans; and identifies feasible mitigation strategies when necessary.

3.18.2 Significance Thresholds

Significant impacts related to transportation would occur if implementation of the Proposed Project would result in any of the following:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

On June 25, 2020, the City of Fresno adopted CEQA Guidelines for VMT thresholds, dated June 25, 2020, pursuant to SB 743 to be effective of July 1, 2020. The thresholds described therein are referred to herein as the City of Fresno VMT Thresholds. The City of Fresno VMT Thresholds document was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) published by the Governor's

Office of Planning and Research (OPR), was utilized as a reference and guidance document in the preparation of the Fresno VMT Thresholds.

3.18.3 Methodology

The potential for the Proposed Project to affect transportation was evaluated based on the use of surface traffic, transit, bicycle, or pedestrian facilities resulting from the Proposed Project.

3.18.4 Existing Conditions / Environmental Setting

The Airport is accessed from the south via E. Clinton Way. Major roadways near the Airport include SR 168 to the west and SR 180 to the south. Access to the existing ATCT is provided via E. Andersen Avenue. Fresno Area Express (FAX) provides bus access to the Airport via Route 26 and Route 39.

3.18.5 Environmental Impacts and Mitigation

3.18.5.1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities

The Proposed Project involves the replacement of an existing facility. No changes to surface traffic, transit, bicycle, or pedestrian facilities would occur as result of the Proposed Project. Therefore, the Proposed Project does not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. There would be ***no impact***.

3.18.5.2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)

SB 743 requires that relevant CEQA analysis of transportation impacts be conducted using a metric known as VMT instead of LOS. VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The State CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that, except with respect to transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS measures of impacts on traffic facilities are no longer a relevant CEQA criteria for transportation impacts.

CEQA Guidelines Section 15064.3(b)(4) states that "[a] lead agency has discretion to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

On June 25, 2020, the City of Fresno adopted CEQA Guidelines for Vehicle Miles Traveled Thresholds, dated June 25, 2020, pursuant to SB 743 effective on July 1, 2020. The thresholds described therein are referred to herein as the City of Fresno VMT Thresholds. The City of

Fresno VMT Thresholds document was prepared and adopted consistent with the requirements of CEQA Guidelines Sections 15064.3 and 15064.7. The December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) published by OPR, was utilized as a reference and guidance document in the preparation of the Fresno VMT Thresholds.

The City of Fresno VMT Thresholds adopted a screening standard and criteria that can be used to screen out qualified projects that meet the adopted criteria from needing to prepare a detailed VMT analysis.

The Proposed Project includes the replacement of an existing facility. The City of Fresno VMT Thresholds Section 3.0 regarding Project Screening discusses a variety of projects that may be screened out of a VMT analysis including specific development and transportation projects. For development projects, conditions may exist that would presume that a development project has a less than significant impact. These may be size, location, proximity to transit, or trip-making potential. For transportation projects, the primary attribute to consider with transportation projects is the potential to increase vehicle travel, sometimes referred to as “induced travel.”

The Proposed Project is eligible to screen out because it is an institutional/government and public service use that is already part of the community, so is accounted for in the existing regional average VMT. Therefore, the Proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). There would be ***no impact***.

3.18.5.3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

The Proposed Project would not alter pedestrian or vehicle access to the project study area or introduce incompatible design features or equipment that would substantially increase the risk of hazards. Therefore, the Proposed Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and there would be ***no impact***.

3.18.5.4 Result in inadequate emergency access

Emergency vehicles would have access to the study area via East Andersen Avenue and emergency access would not be modified as a result of the Proposed Project. Roads adjacent to the project study area would not require closure during project construction as access to the existing ATCT would be maintained throughout construction of the new ATCT. Therefore, the Proposed Project would not result in inadequate emergency access. There would be ***no impact***.

3.19 Utilities / Service Systems

This section describes the existing conditions, potential impacts and, where appropriate, proposed mitigation measures related to water, wastewater utilities and services, stormwater drainage, electric power, natural gas, and telecommunications facilities, as well as the sufficiency of water supplies, wastewater treatment capacity and solid waste disposal.

3.19.1 Regulatory Setting

3.19.1.1 Federal

Clean Water Act

For a discussion of the 1972 Clean Water Act, including the NPDES, see **Section 3.11, Hydrology and Water Quality**.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. The law focuses on all waters designed for drinking uses and authorizes USEPA to establish minimum standards to protect tap water quality and requires all owners or operators of public water systems to comply with these health-related water quality standards. Under SDWA, the USEPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids.

3.19.1.2 State

Porter-Cologne Water Quality Control Act

For a discussion of the Porter-Cologne Water Quality Control Act, see **Section 3.11, Hydrology and Water Quality**.

Urban Water Management Planning Act

The Urban Water Management Planning Act, as amended, was enacted as part of the California Water Code, Section 10610 in 1983 with the purpose of achieving efficient use of urban water supplies, given that water resources are limited and subject to increasing demands in the state. The Act provides a framework for urban water suppliers to assess water resource needs and supplies under multiple hydrologic conditions. It requires development and implementation of an UWMP that includes demand management measures, water shortage contingency plans, and planned uses for recycled water. The California Division of Water Resources (DWR) enforces the act and provides guidance to applicable water utilities. The City of Fresno is the water supplier for the Airport.

Statewide General Water Discharge Requirements for Sanitary Sewer Systems

In accordance with SWRCB Order No. 2022-0103-DWQ *Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems*, Sewer System Management Plans (SSMP) must be prepared and implemented by public operators of wastewater collection systems with more than one mile of pipes. The Order requires that dischargers ensure adequate capacity, report on sanitary sewer overflows, prevent sewer overflows where feasible, and

address system deficiencies. The City of Fresno Solid Waste Division provides solid waste removal for FAT through a third-party service provider, Mid Valley Disposal.

Water Recycling in Landscaping Act

The California Government Code Section 65601, *Water Recycling in Landscaping Act*, promotes the efficient use of water through development of recycling facilities and states that landscape projects should be water efficient. The Act requires local agencies to adopt ordinances that provide general rules and regulations governing the use and distribution of recycled water.

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 (CIWMA) (AB 939, Statutes of 1989) was passed, effective January 1990, to minimize the amount of solid waste that must be disposed of by transformation and land disposal. According to CIWMA, all cities, counties, and solid waste management authorities were required to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. To help in the increase of diversion rates, each jurisdiction is required to create an integrated waste management plan. The plan must promote (in order of priority) source reduction, recycling and composting, and environmentally safe transformation and land disposal. Elements of the plan must be updated every five years.

AB 939 also established the California Integrated Waste Management Board (CIWMB) to oversee integrated waste management planning and compliance. The passage of AB 939 led to the refinement of a statewide system of permitting, inspections, maintenance, and enforcement for waste facilities in California and also required the CIWMB to adopt minimum standards for waste handling and disposal to protect public health and safety and the environment. In 2009, CIWMB was realigned and is currently titled the California Department of Resources Recycling and Recovery (CalRecycle). CalRecycle is responsible for approving permits for waste facilities, approving local agency diversion rates, and enforcing the planning requirements of the law through local enforcement agencies (LEA). LEAs are responsible for enforcing laws and regulations related to solid waste management, issuing permits to solid waste facilities, ensuring compliance with State-mandated requirements, coordinating with other government agencies on solid waste related issues, and overseeing corrective actions at solid waste facilities. LEAs inspect facilities, respond to complaints, and conduct investigations into various aspects of solid waste management.

Commercial Organic Waste Recycling Law

The Commercial Organic Waste Recycling Law (AB 1826) became effective on January 1, 2016, and requires businesses and multi-family complexes (with five or more units) that generate specified amounts of organic waste (compost) to arrange for organics collection services. As of January 1, 2022, the requirements of AB 1826 were eclipsed by those of SB 1383. This new law expands upon the requirements of AB 341, the Mandatory Commercial Recycling Law that focuses on increased commercial waste diversion as a method to reduce GHG emissions, and AB 1826; however, SB 1383 is unique in that it affects property managers, property owners, and businesses. It also requires some businesses to donate excess edible food to feed people while diverting compost materials from the garbage.

2022 California Green Building Standards Code

As amended, CALGreen (CCR Title 24, Part 11) requires that nonresidential building projects recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste or meet a local construction and demolition waste management ordinance, whichever is more stringent (CCR, Title 24, Section 5.408.1). Additionally, 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing must be reused or recycled unless contaminated by disease or pest infestation (CCR, Title 24, Section 5.408.3).

3.19.1.3 Regional and Local

City of Fresno Sewer System Management Plan

The City approved their first SSMP on April 7, 2009, and has since updated their SSMP twice, once in 2014 and another in 2019. The purpose of the SSMP is to establish ways to properly manage, operate, and maintain the sanitary sewer system to reduce and prevent sanitary sewer overflows (SSOs). SSOs are spills that expose the public to untreated or partially treated wastewater and are considered a health hazard.

City of Fresno Recycled Water Master Plan

The City of Fresno prepared a Recycled Water Master Plan to support the goals of the State's Recycled Water Policy which includes increasing the use of recycled water by 200,000 acre-feet per year by 2020 and by 300,000 acre-feet per year by 2030. The Recycled Water Master Plan identifies opportunities to increase usage of recycled water which allows the City to be more sustainable with their water supply and reduce the amount of effluent discharge needed to be processed through the wastewater treatment plan. In addition, the City adopted a Recycled Water Ordinance (Chapter 6, Article 9 of the Fresno Municipal Code) which requires usage of recycled water by existing property owners and future development (City of Fresno, 2024h).

City of Fresno General Plan

The City of Fresno General Plan Public Utilities and Services Element includes the following relevant policies that relate to utility and service system considerations for this Proposed Project:

- **PU-7-a Reduce Wastewater**. Identify and consider implementing water conservation standards and other programs and policies, as determined appropriate, to reduce wastewater flows.
- **PU-8-c Conditions of Approval.** Set appropriate conditions of approval for each new development proposal to ensure that the necessary potable water production and supply facilities and water resources are in place prior to occupancy.
- **PU-8-g Review Project Impact on Supply**. Mitigate the effects of development and capital improvement projects on the long-range water budget to ensure an adequate water supply for current and future uses.
- **PU-9-a New Techniques**. Continue to collaborate with affected stakeholders and partners to identify and support programs and new techniques of solid waste disposal,

such as recycling, composting, waste to energy technology, and waste separation, to reduce the volume and toxicity of solid wastes that must be sent to landfill facilities.

- **PU-9-b Compliance with State Law**. Continue to pursue programs to maintain conformance with the Solid Waste Management Act of 1989 or as otherwise required by law and mandated diversion goals.

3.19.2 Significance Thresholds

Significant impacts would occur related to utilities and service systems if implementation of the Proposed Project would result in any of the following:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect.

b) Not having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

c) A determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Non-compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.19.3 Methodology

Relevant State and local plans were used to conduct the impact analysis of the Proposed Project on utilities and service systems, including water, wastewater, and solid waste. Proposed Project impacts were measured against the existing conditions of the Airport and significance thresholds to determine the level of significance of each impact.

3.19.4 Existing Conditions / Environmental Setting

3.19.4.1 Water Supply

Two divisions of the City of Fresno Department of Public Utilities(DPU) is responsible for the water supply and wastewater utility in the city, which includes the Airport: the Water Division and the Wastewater Management Division.

The City's Water Division is responsible for managing and operating the City's water system. DPU maintains approximately 265 pump stations (wells) and operates three surface water facilities to produce and treat water (City of Fresno, 2024i).

Water supply demands are met through the use of both surface water and groundwater storage sources. The project study area lies within the Kings Subbasin of the San Joaquin Valley Groundwater Basin (California Department of Water Resources, 2019). The Kings Subbasin

comprised of about 1,530 square miles, is located in the southern half of the San Joaquin Valley Groundwater Basin, and is generally bounded by the San Joaquin River to the north, the alluvium-granitic rock interface of the Sierra Nevada foothills to the east, the southern fork of the Kings River to the south, and the Delta-Mendota and Westside Subbasins to the west (California Department of Water Resources, 2006). The project study area lies within the jurisdictional boundary of the North Kings Groundwater Sustainability Agency. Within the Kings Subbasin, the project study area is located in the recharge area of the Fresno Sole Source Aquifer (U.S. Environmental Protection Agency Region 9, 2008). The Fresno Sole Source Aquifer is a mostly unconfined-aquifer system, about 1,840 square miles in size and more than 100 feet below land surface.

The City's surface water comes from the San Joaquin River and the Kings River. Water is delivered to City water treatment facilities via the Friant-Kern Canal Pipeline to the Northeast Surface Water Treatment Facility (NESWTF). Water from the Kings River is held in the Pine Flat Reservoir and then diverted to City water treatment facilities through Fresno Irrigation District (FID) canals and the Kings River Pipeline to the Southeast Surface Water Treatment Facility (SESWTF) (City of Fresno, 2024i).

3.19.4.2 Stormwater

Flood control and stormwater collection and disposal for the City of Fresno, City of Clovis, and the unincorporated areas within the City of Fresno's sphere of influence are provided by the FMFCD.

The City currently complies with the State of California's NPDES General Permit Order No. 2014-0057-DWQ (#CAS000001) for discharges of stormwater associated with industrial activities at FAT.

3.19.4.3 Wastewater

The City's WMD of the DPU is responsible for collecting, conveying, treating, and reclaiming wastewater generated by sewer customers in the Fresno-Clovis metropolitan area. The WMD maintains about 1,600 miles of sanitary sewer lines which are used to transport wastewater from homes and businesses to the Fresno-Clovis Regional Wastewater Facility (RWRF), located about 10.5 miles southwest of the project study area. The Fresno-Clovis RWRF has a permitted treatment capacity of 91.5 million gallons per day (mgd) to secondary standards and a permitted treatment capacity of 5 mgd to tertiary standards. Of its 91.5 mgd treatment capacity, RWRF currently treats about 68 mgd of wastewater to secondary standards (City of Fresno, 2024j).

3.19.4.4 Electric Power, Natural Gas, and Telecommunications

As described in **Section 3.7.4**, PG&E is the power and natural gas provider for FAT facilities. Telecommunications services are provided to the Airport by AT&T.

3.19.4.5 Solid Waste

The DPU's Solid Waste Division provides solid waste removal for the Airport through a third-party service called Mid Valley Disposal. The City currently maintains four six-cubic yard garbage bins and two six-cubic yard recycling bins at the Airport. All bins are emptied three times per week and transported to the Cedar Avenue Recycling and Transfer Station, located about 6.3 miles southwest of the project study area. After the solid waste and recycling are

sorted, garbage is then transferred to the American Avenue Landfill (i.e., American Avenue Disposal Site 10-AA-0009), located about 26 miles west of the Airport (City of Fresno, 2024k). The American Avenue Landfill has a maximum permitted capacity of 32,700,000 cubic yards and a remaining capacity of 29,358,535 cubic yards, with an estimated closure date of August 31, 2031. The maximum permitted throughput is 2,200 tons per day (CalRecycle, 2024a).

Other landfills within the County of Fresno include the Clovis Landfill (City of Clovis Landfill 10-AA-0004) with a maximum remaining permitted capacity of 7,740,000 cubic yards, a maximum permitted throughput of 2,000 tons per day, and an estimated closure date of 2047 (CalRecycle, 2024b).

3.19.5 Environmental Impacts and Mitigation

3.19.5.1 Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect

The City of Fresno DPU has determined that adequate sanitary sewer and water services would be available to serve the Proposed Project subject to the payment of any applicable connection charges and/or fees and extension of services in a manner which is compliant with DPU standards, specifications, and policies.

Effects to storm drainage facilities have been previously discussed in **Section 3.11, Hydrology and Water Quality**. While the Proposed Project would result in either construction of new stormwater drainage facilities or expansion of existing facilities, construction of such facilities would be required to comply with the City's grading plan check process, the SDFCMP, and requirements of the NPDES CGP. Therefore, construction of storm drainage facilities for the Proposed Project would be consistent with the construction and design standards set by the City of Fresno.

The City currently complies with the State of California's NPDES General Permit Order No. 2014-0057-DWQ (#CAS000001) for discharges of stormwater associated with industrial activities at FAT. During construction and operation, stormwater runoff from the Proposed Project would be directed to the existing stormwater drainage system which has the capacity to accommodate the Proposed Project.

The Regional Facility currently has a wastewater capacity of 91.5 mgd. The North Facility has a capacity of 0.71 mgd. The wastewater treatment provider that serves the Proposed Project has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

The Proposed Project would require utilities to be connected to the new ATCT. However, the Proposed Project would be constructed using energy-efficient and modern building materials and construction practices and would install new equipment in accordance with California Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). Additionally, all new buildings would be constructed to meet CALGreen requirements (CCR, Title 24, part 11), which include mandatory measures for nonresidential development in a variety of categories (e.g., materials conservation and resource efficiency). CCR, Title 24, Part 6 building regulations would apply to all new development or redevelopment, including: compliance with American

Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) 90.1 national standards; efficiency requirements for elevators and digital controls; and energy efficiency measures pertaining to building envelopes, mechanical systems, lighting (indoor, outdoor, and signage), electrical power distribution, and solar readiness.

Operation of the new ATCT would also be required to conform to the standards of FAA Order 1053.1C, Energy and Water Management Program for FAA Buildings and Facilities (Federal Aviation Authority, 2017), which establishes energy conservation standards for airport buildings and facilities. By using energy-efficient materials and following the latest standards and regulations discussed above, the new ATCT will be more energy efficient and use fewer natural resources than the existing ATCT.

Therefore, the Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect. The impact would be ***less than significant***.

3.19.5.2 Not having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years

The DPU has determined that adequate sanitary sewer and water services would be available to serve the Proposed Project subject to the payment of any applicable connection charges and/or fees and extension of services in a manner which is compliant with DPU standards, specifications, and policies. Based on the 2020 Urban Water Management Plan, the water supplies for the City (357,330 Acre Feet (AF)/year) are adequate to accommodate the demand in the City by 2045 (241,447 AF/year) (City of Fresno, 2020a). The Proposed Project would be consistent with the General Plan and would therefore be covered by the City's water supply projections. Therefore, there would be ***no impact***.

3.19.5.3 A determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

The Proposed Project is not expected to exceed wastewater treatment requirements of the applicable RWQCB. The City of Fresno owns and operates two wastewater treatment facilities, the Fresno/Clovis Regional Wastewater Reclamation Facility and the North Fresno Wastewater Reclamation Facility. The Regional Facility currently has a capacity of 91.5 mgd. The North Facility has a capacity of 0.71 mgd. The Proposed Project would not result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Therefore, there would be ***no impact***.

3.19.5.4 Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals

Demolition of the existing ATCT and construction of the Proposed Project would result in a temporary increase in the generation of solid waste over the two-year construction period. The landfills within the County of Fresno have the capacity to accommodate the construction-related solid waste from the Proposed Project. Therefore, the temporary increase in solid waste during construction would not be significant.

Because the existing ATCT would be demolished following completion of the new ATCT, operation of the Proposed Project is not expected to generate additional solid waste beyond what is currently generated. Additionally, given the available capacity at the landfills, the additional solid waste generated by the Proposed Project is not anticipated to cause the facility to exceed its daily permitted capacity. As such, the Proposed Project would be served by a landfill with sufficient capacity to accommodate the facility's waste disposal needs. The impact would be ***less than significant***.

3.19.5.5 Non-compliance with federal, state, and local management and reduction statutes and regulations related to solid waste

The Proposed Project would comply with CALGreen, the City's Construction and Demolition Waste Management Guide, and with waste management policies and recommendations from the General Plan. The Proposed Project would dispose of waste in accordance with applicable federal, state, and local recycling, reduction, and waste requirements and policies. Therefore, the Proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. There would be ***no impact***.

3.20 Wildfire

This section describes the existing setting related to wildfire based on the current conditions as the basis for the discussion of potential impacts and any proposed mitigation measures resulting from implementation of the Proposed Project at FAT.

3.20.1 Regulatory Setting

3.20.1.1 Federal

There are no federal statutory or regulatory requirements that apply to wildfire.

3.20.1.2 State

Fire Hazard Severity Zones

Under California law, Sections 4201–4204 of the Public Resources Code require the mapping of Fire Hazard Severity Zones within areas managed by the state (State Responsibility Areas or SRAs). These zones are designated by California Department of Forestry and Fire Protection (CAL FIRE) and are based on wildfire risk factors such as vegetation levels (fuel loading), terrain slope, and local fire weather conditions. Areas are classified into Moderate, High, or Very High hazard zones, which then guide building regulations, requirements for defensible space, and other fire prevention and safety strategies.

3.20.1.3 Regional and Local

City of Fresno Municipal Code

City of Fresno Municipal Code Article 5, Fire Prevention, and Title 15.10, Fire Code, identifies the requirements for structures within the city of Fresno to meet fire requirements as well as other environmental protection considerations. The code also establishes the Fire Protection District to enforce the provisions of the code relating to physical security requirements for commercial buildings in the city.

3.20.2 Significance Thresholds

Significant impacts related to wildfire would occur if implementation of the Proposed Project would result in any of the following:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

3.20.3 Methodology

To determine potential impacts related to wildfire, the project study area was reviewed in comparison to CAL FIRE maps.

3.20.4 Existing Conditions / Environmental Setting

The project study area is mapped as Local Responsibility Area Unzoned, indicating that the area is urbanized, not susceptible to wildland conflagrations, and is not located within a VHFHSZ (California Department of Forestry and Fire Protection, 2023).

3.20.5 Environmental Impacts and Mitigation

3.20.5.1 Substantially impair an adopted emergency response plan or emergency evacuation plan

The Airport is not located in an area that has been designated as VHFHSZ (CAL FIRE, 2007). Therefore, the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. There would be ***no impact***.

3.20.5.2 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire

The Airport is not located in an area that has been designated as VHFHSZ. Therefore, due to slope, prevailing winds, and other factors, the Proposed Project would not exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. There would be ***no impact***.

3.20.5.3 Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment

The Airport is not located in an area that has been designated as VHFHSZ. Therefore, the Proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. There would be ***no impact***.

3.20.5.4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

The Airport is not located in an area that has been designated as VHFHSZ. Therefore, the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. There would be ***no impact***.

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4 Alternatives

As required under Section 15126(d) of the CEQA Guidelines, an EIR must discuss a range of reasonable alternatives to a project that would feasibly attain most of the basic objectives of the project while avoiding or lessening significant environmental effects. An evaluation of the comparative merits of the project alternatives is also required. This chapter provides a discussion of alternatives to the Proposed Project, including a No Project Alternative, which is considered to be an alternative to the Proposed Project in conformance with Section 15126(d) of the CEQA Guidelines. The comparison of impacts between the project alternatives and the Proposed Project is presented in this chapter and is based on the discussion of the impacts associated with the Proposed Project as presented in **Chapter 3**.

This chapter provides a description of other alternatives that were reviewed and presents the reasons each of these other alternatives was either brought forward for or screened from further study. Finally, this chapter also identifies an environmentally superior alternative, as required for CEQA analysis. The purpose of the alternatives analysis is to explore ways that the objectives of the Proposed Project could be attained while reducing or avoiding significant environmental impacts of the project as proposed. This process is intended to foster informed decision-making in the environmental process.

4.1 Alternatives Screening Process

The alternatives were screened using three factors. The first factor considered reasonable alternatives within the context of the City's objective of the Proposed Project (Factor 1 Screening). This objective, presented in **Section 2.5**, is repeated below to assist the reader in understanding the Factor 1 Screening.

> **Project Objective:** Provide an ATCT facility that meets current FAA, State, and local building standards and improves safety and operations at the Airport for ATCT operators and Airport users.

The project objective is consistent with the following objective and policy of the Mobility and Transportation Element of *The City of Fresno General Plan* (General Plan) (City of Fresno, 2014a):

- **Objective M-12:** Operate the City's municipal airport facilities to meet present and anticipated demands in a manner that maintains compliance with federal regulations, enhances safety to the public, minimizes the adverse effects of aircraft operations on people, and promotes the economic health of the community.
- **Policy M-12-a: Funding for Airport Capital Improvements.** Pursue appropriate funding sources and capital improvement budget enhancements that will:
    - Provide a modern, safe, and efficient municipal airport terminal facility including the Federal Inspection Station and airfield;
    - Maintain airfield compliance with FAA Part 139 operating requirements;
    - Maintain financial self-sufficiency and long-term sustainability; and

Continue to implement the master plans for FYI Airport and Fresno Chandler Executive Airport to meet projected air passenger travel, air cargo transportation and general aviation demands.

Under Factor 2 Screening, alternatives were evaluated in terms of constructability, cost, and airfield operational functionality considerations.

Factor 3 Screening evaluated alternatives based on their potential to avoid the significant effect on the historic resource (existing ATCT) that would be affected by the Proposed Project. The alternatives were evaluated using all three factors to determine if any alternative would be considered feasible to implement.

4.1.1 Factor 1 Screening: Meeting Project Objectives

The Factor 1 Screening evaluated each alternative's ability to satisfy the project objective identified by the City. As part of the evaluation of each alternative's ability to meet the project objective, an important consideration is, as described in **Section 2.5**, the ability for the alternative to meet the following five criteria:

1) meet current FAA, State, and local building standards;
2) provide adequate height and unobstructed lines of sight;
3) allow for operational efficiency;
4) not result in high costs of repairs and disruptions to facility operations due to frequent repairs and emergency maintenance; and
5) be secure from unauthorized access

Alternatives that would not meet the criteria of the project objective were considered to be less viable than those that provide an ATCT facility that meets current FAA, State, and local building standards and improves safety and operations at the Airport for ATCT operators and Airport users.

4.1.2 Factor 2 Screening: Constructability, Cost, and Airfield Operational Functionality Considerations

The Factor 2 Screening analysis was designed to determine which alternatives would be considered reasonable to implement in terms of constructability, cost, and operational functionality, as described below.

4.1.2.1 Constructability

Construction on and around an airport has the potential to affect airport infrastructure and operations. Consideration was given to the potential of each alternative that would be practical to implement using sound engineering judgement. Those alternatives with higher potential for adverse effects associated with constructability are considered to be less viable than those that have the potential to result in fewer construction-related effects.

4.1.2.2 Cost

The City also looked at ways to reduce costs. Each alternative was reviewed to determine whether the estimated costs of implementation of the alternative would be disproportionately greater than the costs of other alternatives.

4.1.2.3 Airfield Operational Functionality

This criterion assesses whether an alternative would potentially introduce airfield operational problems. The principal concern, pursuant to federal advisory circulars, orders, regulations, and design guidelines, is whether an alternative would introduce conflicts for the movement of aircraft or create safety hazards for aircraft, employees, or passengers, or potentially interrupt ATC operations. Alternatives that would not introduce potential conflicts or hazards are considered to be more viable than those that would.

4.1.3 Factor 3 Screening: Environmental Impacts

The Factor 3 Screening process focused on avoiding the potential for significant effects resulting from the Proposed Project. Although it is known that there may be other environmental resources that could be affected by the implementation of the Proposed Project, the only potentially significant impact is due to the adverse effect to the existing ATCT as an eligible historic resource. Therefore, the focus of Factor 3 Screening is on evaluating whether an alternative would avoid this potential significant environmental effect. Factor 3 Screening evaluates each of the alternatives based on the potential to result in direct or indirect effects to historic resources. Those alternatives with the potential for no effects or fewer effects to historic resources were considered more viable than those with the potential to generate greater effects to historic resources.

4.2 Alternatives Development

A total of seven alternatives, including the No Project, were evaluated against the screening factors. The focus of these alternatives is on the ATCT building, including utilities. The other components of the project, such as fencing and parking, can be accommodated with each of the alternatives, so these components are not included in the alternatives screening process.

The alternative site locations described in the following sections were identified during initial planning for the replacement of the ATCT and are located on existing Airport property. Any additional sites, or tower placement options within those sites, that were initially identified as potential ATCT site locations during prior planning studies overlap with the site locations evaluated below and would not result in any change to the alternatives evaluation or results.

The differing heights of a new ATCT at the alternative site locations were determined using the FAA's Air Traffic Control Visibility Analysis Tool, which assesses the impact of tower height on ATCT specialist distance perception (Federal Aviation Administration, 2025b). Maximum visibility of airborne traffic patterns and airfield movement surfaces must be available to all ATC's positions. The minimum height of the tower was first determined by the Line of Sight (LOS) calculated over a distance from the proposed ATCT location to the furthest point of the aircraft movement area (referred to as the "key point") and then validated relative to airfield configuration and Airport buildings. The LOS was analyzed to all points on the airfield movement and non-movement areas relative to two basic perspectives: (1) from the ATC's eye to each runway and parallel taxiway; and (2) from the ATC's eye to other critical points, such as aircraft aprons and points of entry to airport operation areas, relative to /structures that may obstruct the view.

The site locations described in **Sections 4.2.1 through 4.2.7** were evaluated in the 2018 Airport Master Plan Update (City of Fresno, 2019a) or the ATCT Siting Report (CTBX, 2024). Site locations identified in the 2018 Master Plan Update were recommended to be carried through the siting analysis. The ATCT Siting Report recommended Site X2, discussed under Alternative 1 below, for the proposed new ATCT tower.

With the exception of Alternative 2, each alternative discussed below includes three options on how the existing ATCT can be treated. These options are (A) preserve the existing ATCT in place, (B) retain the existing ATCT for other uses, and (C) demolish the existing ATCT. Options A and B were identified in response to a request by the City's Historic Preservation Commission (HPC) during the EIR scoping process to evaluate all options that would preserve or retain the existing ATCT. Because these options are the same under each alternative, with the exception of Alternative 2, they are only discussed once, under Alternative 1. Alternative 2 and Options B and C are considered environmental avoidance alternatives.

The potential alternatives are described below and are shown in **Figure 4-1**.

4.2.1 Alternative 1: Site X2 (Proposed Project)

Alternative 1 would construct a new ATCT facility approximately 250 feet south of the existing ATCT on a parcel that is also adjacent to the ARFF station, an Airport maintenance building, and a vehicle parking lot. The new facility would have an estimated building footprint of 13,000 sq ft and be approximately 190 feet tall. Access to the new facility would remain the same as to the existing ATCT, which is accessible from E. Andersen Avenue. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

Utility services to the new facility would be connected from existing utility systems, as shown in **Figure 2-4**. As the new ATCT facility would be constructed adjacent to existing buildings, utility connections are accessible in close proximity and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT.

Once the new ATCT is in operation, there are three options for the existing facility: preservation in place, reuse of the facility for another use, or demolition. These options are described below.

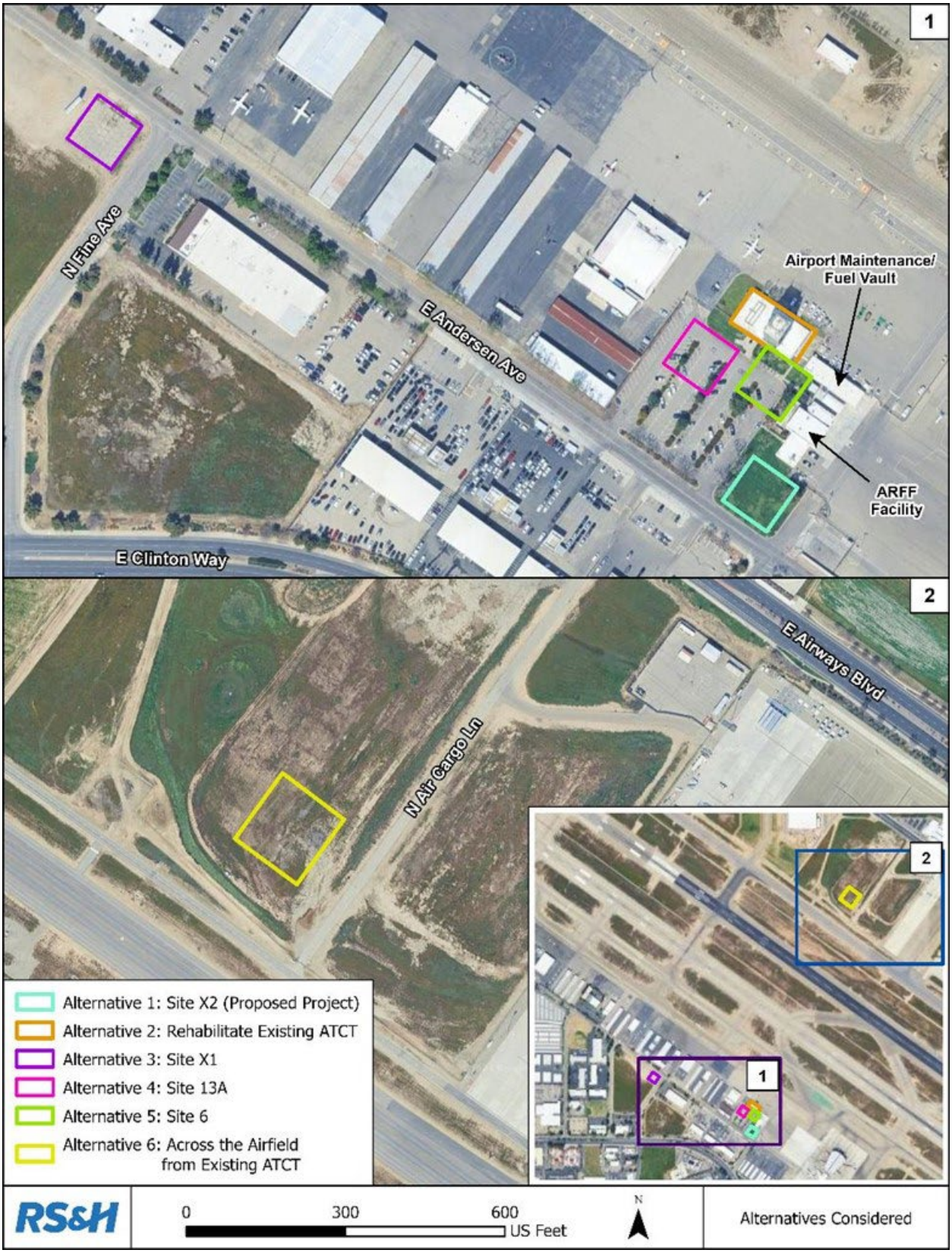
4.2.1.1 Option A: Preserve Existing ATCT in Place

Option A would preserve the existing ATCT facility as a vacant building in its current location and move existing operations into the new ATCT facility.

The ATCT is eligible for listing on the NRHP, therefore necessary steps would be taken to ensure the long-term integrity and character-defining elements of the ATCT through repairs, restoration, and continued maintenance. See **Section 3.6.4.1** for additional information on NRHP eligibility.

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

Figure 4-1: Alternatives Considered



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

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

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

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

4.2.1.2 Option B: Retain Existing ATCT for Another Use at FAT

Retaining the existing ATCT for other uses would include all of the preservation, repairs, and rehabilitation identified under Option A. Additionally, because ATC operations would be relocated to a new facility, this option would also not require that the existing ATCT meet the current FAA space and height requirements. However, different than Option A and Alternative 2, because the facility would then be repurposed for another use at FAT, the building would need to be updated to meet current State and local building requirements, such as seismic, fire, and ADA standards. Therefore, this option would require extensive upgrades and repairs that could alter architectural features of the existing structure, resulting in the degradation of the integrity of the design, materials, and workmanship that contribute to the eligibility of the ATCT as a historic resource under 36 CFR § 60.4 Criterion C.

Following repairs and restoration of the existing ATCT, the building could be reused for other Airport uses, such as office space. However, because it is located on Airport property and is adjacent to an active airfield (i.e., an aircraft movement area) and access-controlled Airport facilities, it could not be converted into a facility that would allow for public access per FAA AC 150/5300-13B, Airport Design, and FAA Order 1600.69D, *FAA Facility Security Management Program*. Further, the new ATCT would require prohibiting public access and securing employee parking; therefore, a publicly-accessible building within the project study area would not be able to provide public parking as required under Article 24 of the City of Fresno Municipal Code, Parking and Loading (City of Fresno, 2025).

4.2.1.3 Option C: Demolish Existing ATCT (Included in Proposed Project)

This option would demolish the existing ATCT facility once the new ATCT is fully operational. The site could then be converted to vehicle parking, as is proposed under the Proposed Project, or another Airport facility. The site could also be converted to airfield use or remain vacant with the addition of a security fence to prevent unauthorized access to the airfield.

4.2.2 Alternative 2: Rehabilitate Existing ATCT for Continued Use at FAT

Alternative 2 would include retaining the existing ATCT at its current location and continuing its use as the FAT ATCT. As identified under Alternative 1, Option B, the building would be required to be updated to meet current State and local building requirements, such as seismic, fire, and ADA standards. However, because the facility would also continue to be used for ATC operations, the ATCT would be rehabilitated to meet the current FAA space and height requirements detailed in FAA Order 6480.7E, *Airport Traffic Control Tower (ATCT) and Terminal Radar Approach Control (TRACON) Design Policy*. To meet these requirements, the height of the existing 94-foot tower would need to be increased by approximately 65 feet to meet line-of-sight requirements and the cab would need to be expanded from approximately 350 square feet to 440 square feet to meet cab size requirements based on Airport activity and staffing levels. Therefore, this option would require an addition to the existing structure that would degrade the eligibility of the ATCT under 36 CFR § 60.4 Criterion C as a historic resource, including extending the height of the tower and expanding or replacing the cab at the top of the tower.

Options A, B, and C do not apply to Alternative 2 because the options are only relevant if a new ATCT facility is constructed at a different location.

4.2.3 Alternative 3: Site X1

Alternative 3 is located at the intersection of E. Andersen Avenue and N. Fine Avenue on the southwest side of the airfield in a small remote parking lot surrounded by vacant land, approximately 1,340 feet northwest of the existing ATCT. Access to the building would be provided from E. Andersen Avenue or N. Fine Avenue.

The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 2.6**. The floor of the cab would be 200 feet tall; the cab would be about 17 feet tall with up to 23 feet of additional height from antennas extending above the cab for a total ATCT height of up to 240 feet. The height of this alternative is approximately 50 feet taller than the height required at other alternative locations because of the extended distance to the airfield, requiring the additional height to see over existing Airport structures in order to see the ends of each of the runways. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

Because there are currently no structures connected to utilities at the site or adjacent to the site, utilities would have to be extended from the facilities either across E. Andersen Avenue or N. Fine Avenue to reach Site X1.

4.2.4 Alternative 4: Site 13A

Alternative 4 is located within the parking lot of the existing ATCT, approximately 140 feet southwest of the existing facility. The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 2.6**. The floor of the cab would be 150 feet tall; the cab would be about 17 feet tall with up to 23 feet of additional height from antennas extending above the cab for a total ATCT height of up to 190 feet. Access to the new facility would remain the same as to the

existing ATCT, which is accessible from E. Andersen Avenue. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

Utility services to the new facility would be connected to the new facility from existing utility systems. Similar to Alternative 1 (Proposed Project), utility connections are accessible in close proximity and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT.

4.2.5 Alternative 5: Site 6

Alternative 5 is located within the parking lot of the existing ATCT, approximately 100 feet south of the existing facility. The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 2.6**. The floor of the cab would be 100 feet tall; the cab would be about 17 feet tall with up to 23 feet of additional height from antennas extending above the cab for a total ATCT height of up to 140 feet. Access to the new facility would remain the same as to the existing ATCT, which is accessible from E. Andersen Avenue. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

Utility services to the new facility would be connected to the new facility from existing utility systems. Similar to Alternative 1 (Proposed Project), utility connections are accessible in close proximity and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT.

4.2.6 Alternative 6: Across the Airfield from the Existing ATCT

Alternative 6 is located across the airfield from the existing ATCT on a vacant parcel off N. Cargo Lane. The estimated building footprint and facilities included in the ATCT facility and base building would be equivalent to what is described for the Proposed Project in **Section 2.6**. The floor of the cab would be 120 feet tall; the cab would be about 17 feet tall with up to 23 feet of additional height from antennas extending above the cab for a total ATCT height of up to 160 feet. Access to the building would be provided from N. Cargo Lane via E. Airways Boulevard. New ATC equipment, communications equipment, and electric panels would be installed in the new ATCT.

Because there are currently no structures connected to utilities at the site or adjacent to the site, utilities would have to be extended from either the hangar facility to the northwest of the site or from the animal shelter facilities E. Airways Boulevard.

4.2.7 No Project Alternative

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

4.3 Alternatives Screening

4.3.1 Factor 1 Screening

All of the alternatives identified above were evaluated as part of the screening process. The Factor 1 Screening process is documented for each alternative below.

4.3.1.1 Alternative 1: Site X2 (Proposed Project)

Alternative 1 would provide an ATCT facility that meets the objective for the Proposed Project. However, the ability of Alternative 1 to meet the project objective criteria depends on whether the existing ATCT facility remains in place. Therefore, this alternative is further evaluated with each option below.

Option A: Preserve Existing ATCT in Place

Option A would result in Alternative 1 continuing to meet criteria 1 and 5 of the project objective. Option A would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards. However, the existing ATCT would not meet these standards because the structure would remain vacant and extensive improvements to the ATCT would not be required to meet current State and local building requirements, such as seismic, fire, and ADA standards, due to the potential for the City to provide exceptions for historical structures. Option A would also meet criterion 5, as both the new and old ATCTs would remain in a secure area, however it would not meet any of the remaining criteria.

Option A would result in Alternative 1 not meeting criteria 2, 3 and 4 of the project objectives. Preserving the existing ATCT in place would affect the ability of Alternative 1 to meet criterion 2 because it would block the line of sight from the new ATCT to a portion of Taxiway A. This obstruction would also result in the option not meeting criterion 3 to allow for operational efficiency due to the potential disruption between pilot and ATC communication. Finally, this option does not meet criterion 4 because it would result in high costs of repairs to the existing facility in order to preserve the integrity of the building.

Therefore, Alternative 1, Option A would not meet the objective of the Proposed Project and was eliminated from further consideration.

Option B: Retain Existing ATCT for Another Use at FAT

Option B, as under Option A, would result in Alternative 1 continuing to meet criteria 1 and 5 of the project objective. Option B would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards, and the existing ATCT would not be required to meet FAA ATCT standards because it would no longer function as an ATCT. Additionally, the existing ATCT would be brought up to State and local building standards, as required, to retain it for another use as a functional building at FAT. Option B would meet criterion 5 by securing the future and existing ATCT sites from unauthorized access.

Option B Option B would result in Alternative 1 not meeting criteria 2, 3 and 4 for the same reasons that Option A would not. Therefore, Alternative 1, Option B would not meet the objective of the Proposed Project and was eliminated from further consideration.

Option C: Demolish Existing ATCT

Option C would result in Alternative 1 continuing to meet the objective for the Proposed Project. Option C would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards, and the existing ATCT would be demolished, thus not requiring upgrades to meet building standard codes for another use. Option C would meet criterion 2 because the line-of-sight obstruction caused by the existing facility would be removed. Option C would meet criterion 3 with the removal of the partial obstruction of the aircraft apron immediately east of the terminal, resulting in unimpeded communication with aircraft. Option C would meet criterion 4 because the existing ATCT would be demolished and would, therefore, no longer require frequent repairs and emergency maintenance. Option C would meet criterion 5 by securing the future ATCT site from unauthorized access. The existing ATCT would be demolished, so there would not be a need to provide secure access at that site. Therefore, Alternative 1, Option C meets the objective of the Proposed Project and was considered in Factor 2 Screening.

4.3.1.2 Alternative 2: Rehabilitate Existing ATCT for Continued Use at FAT

Rehabilitating the existing ATCT for continued use at FAT would require extensive upgrades and repairs. As indicated by Airport personnel, the existing ATCT is “outdated and in need of nearly $10M in improvements and upgrades” (City of Fresno, 2019a). Assuming the upgrades and repairs can successfully bring the existing ATCT up to current FAA space and height requirements and State and local building standards, Alternative 2 would meet criteria 1, 2, 3, and 5 in that it would meet current FAA, State, and local building standards, it would provide adequate height and unobstructed lines of sight, it would allow for operational efficiency by removing the partial obstruction of the aircraft apron immediately east of the terminal through the increase in the tower height accomplished during the improvements and upgrades to the existing ATCT, and it would be secure from unauthorized access. However, this alternative would not meet criteria 4 of the project objective because it would result in high costs of repairs and disruptions to facility operations due to frequent repairs and emergency maintenance. As a result, Alternative 2 would not meet the objective of the Proposed Project and was eliminated from further consideration.

4.3.1.3 Alternative 3: Site X1

Alternative 3 would provide a new ATCT facility that meets the project objective for the Proposed Project. However, the ability of Alternative 3 to meet the project objective depends on whether the existing ATCT facility remains in place. Therefore, this alternative is further evaluated with each option below.

Option A: Preserve Existing ATCT in Place

Option A would result in Alternative 3 continuing to meet criteria 1, 2, 3 and 5 of the project objective. Option A would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards. However, the existing ATCT would not meet these standards, because the structure would remain vacant and extensive improvements would not be required to meet current State and local building requirements, such as seismic, fire, and ADA standards, due to the potential for the City to provide exceptions for historical structures. Criteria 2 and 3 would be met by providing an ATCT facility that provides adequate height and unobstructed lines of sight and allows for operational efficiency because Alternative 3 is located far enough away from the

existing ATCT so it would not cause a line-of-sight obstruction. This option would also meet criterion 5 by securing the ATCT site from unauthorized access.

Option A would result in Alternative 3 not meeting criterion 4 because it would result in high costs of repairs to the existing facility in order to preserve the integrity of the building. Therefore, Alternative 3, Option A would not meet the objective of the Proposed Project and was eliminated from further consideration.

Option B: Retain Existing ATCT for Another Use at FAT

Option B would continue to meet criteria 1, 2, 3 and 5 for the same reasons as under Option A. However, Option B would not meet criterion 4 for the same reasons that Option A would not. Therefore, Alternative 3, Option B would not meet the objective of the Proposed Project and was eliminated from further consideration.

Option C: Demolish Existing ATCT

Option C would result in Alternative 3 continuing to meet the objective of the project objective. Option C would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards, and the existing ATCT would be demolished, thus not requiring upgrades to meet building standard codes for another use. Option C would meet criterion 2 because the line-of-sight obstruction caused by the existing facility would be removed. Option C would meet criterion 3 with the removal of the partial obstruction of the aircraft apron immediately east of the terminal, resulting in unimpeded communication with aircraft. Option C would meet criterion 4 because the existing ATCT would be demolished and would, therefore, no longer require frequent repairs and emergency maintenance. Option C would meet criterion 5 by securing the future ATCT site from unauthorized access. The existing ATCT would be demolished, so there would not be a need to provide secure access at that site. Therefore, Alternative 3, Option C meets the objective of the Proposed Project and was considered in Factor 2 Screening.

4.3.1.4 Alternative 4: Site 13A

Alternative 4 would provide an ATCT facility that meets the project objective. However, the ability of Alternative 4 to meet the project objective for the Proposed Project depends on whether the existing ATCT facility remains in place. Therefore, this alternative is further evaluated with each option below.

Option A: Preserve Existing ATCT in Place

Option A would result in Alternative 4 continuing to meet criteria 1 and 5 of the project objective. Option A would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards. However, the existing ATCT would not meet these standards, because the structure would remain vacant, extensive improvements to the ATCT would not be required to bring the building up to code to meet current State and local building requirements, such as seismic, fire, and ADA standards, due to the potential for the City to provide exceptions for historical structures. Option A would also meet criterion 5, as both the new and old ATCTs would remain in a secure area, however it would not meet any of the remaining criteria.

Option A would result in Alternative 4 not meeting criteria 2, 3 and 4 of the project objective. Preserving the existing ATCT in place would affect the ability of Alternative 4 to meet criterion 2 because it would block the line of sight from the new ATCT to a portion of Taxiway A. This

obstruction would also result in the option not meeting criterion 3 to allow for operational efficiency due to the potential disruption between pilot and ATC communication because of the partial obstruction of the aircraft apron immediately east of the terminal that would result in the ATC not being able to see the location of an aircraft at this location. This option does not meet criterion 4 because it would result in high costs of repairs to the existing facility in order to preserve the integrity of the building. Therefore, Alternative 4, Option A would not meet the objective of the Proposed Project and was eliminated from further consideration.

Option B: Retain Existing ATCT for Another Use at FAT

Option B, as under Option A, would criteria 1 and criterion 5. Option B would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards, and the existing ATCT would not be required to meet FAA ATCT standards because it would no longer function as an ATCT. Additionally, the existing ATCT would be brought up to State and local building standards, as required, to retain it for another use as a functional building at FAT. Option B would meet criterion 5 by securing the future and existing ATCT sites from unauthorized access. Option B would not meet criteria 2, 3, or 4 for the same reasons that Option A would not. Therefore, Alternative 4, Option B would not meet the objective of the Proposed Project and was eliminated from further consideration.

Option C: Demolish Existing ATCT

Option C would result in Alternative 3 continuing to achieve the objective for the Proposed Project. Option C would meet criterion 1 because the new ATCT would meet FAA, State, and local building standards, and the existing ATCT would be demolished, thus not requiring upgrades to meet building standard codes for another use. Option C would meet criterion 2 because the line-of-sight obstruction caused by the existing facility would be removed. Option C would meet criterion 3 with the removal of the partial obstruction of the aircraft apron immediately east of the terminal, resulting in unimpeded communication with aircraft. Option C would meet criterion 4 because the existing ATCT would be demolished and would, therefore, no longer require frequent repairs and emergency maintenance. Option C would meet criterion 5 by securing the future ATCT site from unauthorized access. The existing ATCT would be demolished, so there would not be a need to provide secure access at that site. Therefore, Alternative 4, Option C meets the objective of the Proposed Project and was considered in Factor 2 Screening.

4.3.1.5 Alternative 5: Site 6

Alternative 5 would provide an ATCT facility that meets criteria 1 and 5 of the project objective. Alternative 5 would meet criterion 1 because the new ATCT would meet current FAA, State, and local building standards, and the existing ATCT would not be required to meet FAA ATCT standards because it would no longer function as an ATCT. Additionally, the existing ATCT would be brought up to State and local building standards, as required, to retain it for another use as a functional building at FAT. Alternative 5 would meet criterion 5 by securing the future and existing ATCT sites from unauthorized access.

Alternative 5 would not meet criteria 2, 3 and 4. It would not correct the parallax issue identified under criterion 2 because from the new ATCT, ATCs would continue to not be able to determine if a pilot is lined up to land on Runway 29R or Runway 29L. In addition, Alternative 5 would not meet criterion 3 to allow for operational efficiency due to the potential disruption between pilot

and ATC communication because of the partial obstruction of the aircraft apron immediately east of the terminal that would result in the ATC not being able to see the location of an aircraft at this location. Alternative 5 would not meet criterion 4 under Options A and B because those options would result in high costs of repairs to the existing facility in order to preserve the integrity of the building. However, Alternative 5 would meet criterion 4 under Option C because it would not result in high costs of repairs and disruptions to facility operations due to frequent repairs and emergency maintenance. As a result, Alternative 5, including all options, would not meet the objective for the Proposed Project and has been eliminated from further consideration.

4.3.1.6 Alternative 6: Across the Airfield from the Existing ATCT

Alternative 6 would provide an ATCT facility that meets criteria 1 and 5 of the project objective. Alternative 6 would meet criterion 1 because the new ATCT would meet current FAA, State, and local building standards, and the existing ATCT would not be required to meet FAA ATCT standards because it would no longer function as an ATCT. Additionally, the existing ATCT would be brought up to State and local building standards, as required, to retain it for another use as a functional building at FAT. Alternative 6 would meet criterion 5 by securing the future and existing ATCT sites from unauthorized access.

Alternative 6 would not meet criteria 2, 3, and 4. It would present a new line of sight issue due to the location and angle of an ATCT at this location. From the new ATCT, ATCs would have difficulty discerning between Taxiways A and B and would continue to have a parallax issue at Runway 29L because of the increased distance from the runway end. Additionally, the angle of the new ATCT would result in the afternoon/evening sun in the eyes of the ATCs. This would result in an obstructed line of sight and would not meet criterion 2. In addition, Alternative 6 would not meet criterion 3 to allow for operation efficiency due to the potential disruption between pilot and ATC communication because of the partial obstruction of the aircraft apron immediately east of the terminal that would result in the ATC not being able to see the location of an aircraft at this location. Alternative 6 would not meet criterion 4 under Options A and B because those options would result in high costs of repairs to the existing facility in order to preserve the integrity of the building. However, Alternative 6 would meet criterion 4 under Option C because it would not result in high costs of repairs and disruptions to facility operations due to frequent repairs and emergency maintenance. As a result, Alternative 6, including all options, would not meet the objective of the Proposed Project and was eliminated from further consideration.

4.3.1.7 No Project Alternative

The No Project Alternative fails to meet the objective for the Proposed Project in that it: 1) would not provide a new ATCT facility or undergo any major renovations or repairs to meet current FAA, State, and local building standards; 2) would not result in a facility that provides adequate height and unobstructed lines of sight because the existing parallax issue for ATCs looking at Runways 29R and 29L is not corrected and ATCs would not be able to determine if a pilot is lined up to land on the correct runway; 3) would not allow for operational efficiency; 4) would continue to require high cost repairs and result in disruptions to facility operations due to frequent repairs and emergency maintenance and; 5) would continue to not be secure from unauthorized access. However, the No Project Alternative must be carried forward in the assessment of environmental impacts as required by CEQA.

4.3.1.8 Summary of Factor 1 Screening Process

Table 4-1 provides a summary of all alternatives considered in this EIR and the results of Factor 1 Screening.

4.3.2 Factor 2 Screening

Each alternative that advanced from the Factor 1 Screening process was evaluated under Factor 2 Screening to determine whether the potential alternative would be reasonable to implement in terms of constructability, cost, and operational functionality.

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

Alternative 1, Option C would construct a new structure comprised of the tower shaft and cab at the top of the shaft and demolish the existing ATCT. The structure would be approximately 167 feet tall with an additional 23 feet of height from antennas extending above the cab for a total of 190 feet. The proposed height of the structure is comparable to the height required under Alternative 4. Additionally, as the site is developed, the construction of this alternative would not involve complex site conditions, such as extensive grading or the relocation of utilities from another location at the Airport. Utility services to the new facility would be connected to the new facility from existing utility systems and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT, as shown in **Figure 2-4**. Therefore, neither the height of the structure nor the condition of the site would result in disproportionately higher costs of construction when compared to other alternatives and this alternative would be reasonable to construct.

Alternative 1, Option C would require the construction of a new ATCT facility approximately 250 feet south of the existing ATCT and demolition of the existing ATCT upon full operation of the new ATCT. Construction of the new facility at this distance from the existing facility would not be expected to result in disruptions to ongoing ATC operations or result in vibration or construction emissions effects that could affect the integrity of the structure or otherwise adversely affect ATC operators onsite or create safety hazards for aircraft, employees, or passengers. Because Alternative 1 is located on Airport property, near the existing ATCT, it is not anticipated that this alternative would have an effect on landside operations or create safety hazards for aircraft, employees, or passengers. Therefore, Alternative 1 would not have a material effect on airfield operations, including ATC operations, or landside operations, and would be reasonable to implement.

4.3.2.2 Alternative 3: Site X1, with Option C

Alternative 3, Option C would construct a new structure, 217 feet tall with an additional 23 feet of height from antennas extending above the cab for a total of 240 feet and demolish the existing ATCT. The proposed height of the structure is approximately 50 feet taller than the height required at other alternative locations. Additionally, as the site is undeveloped, the construction of this alternative would potentially involve complex site conditions, such as extensive grading, foundation work, and utility relocations. Utilities would have to be extended from the facilities either across E. Andersen Avenue or N. Fine Avenue to reach Site X1.

Alternative 3, Option C would require the construction of a new ATCT facility at the intersection of E. Andersen Avenue and N. Fine Avenue in a small remote parking lot surrounded by vacant land, approximately 1,340 feet northwest of the existing ATCT. Construction of the new facility

Table 4-1: Factor 1 Screening Results

Screening Factor 1 Criteria	Alternative 1: Site X2 (Proposed Project)	Alternative 2: Rehabilitate Existing ATCT for Continued Use at FAT	Alternative 3: Site X1	Alternative 4: Site 13A	Alternative 5: Site 6	Alternative 6: Across the Airfield from the Existing ATCT	No Project Alternative
1) Meets current FAA, State, and local building standards	Option A: **Yes** Option B: **Yes** Option C: **Yes**	**Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	**No**
2) Provides adequate height and unobstructed lines of sight	Option A: **No** Option B: **No** Option C: **Yes**	**Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **No**	Option A: **No** Option B: **No** Option C: **No**	**No**
3) Allows for operational efficiency	Option A: **No** Option B: **No** Option C: **Yes**	**Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **No**	Option A: **No** Option B: **No** Option C: **No**	**No**
4) Does not result in disruptions to facility operations and high costs of repairs due to frequent repairs and emergency maintenance	Option A: **No** Option B: **No** Option C: **Yes**	**No**	Option A: **No** Option B: **No** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **Yes**	**No**
5) Is secure from unauthorized access	Option A: **Yes** Option B: **Yes** Option C: **Yes**	**Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	Option A: **Yes** Option B: **Yes** Option C: **Yes**	**No**
Move to Factor 2 Screening?	Option A: **No** Option B: **No** Option C: **Yes**	**No**	Option A: **No** Option B: **No** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **Yes**	Option A: **No** Option B: **No** Option C: **No**	Option A: **No** Option B: **No** Option C: **No**	**Yes**/a/

/a/ Required by CEQA to be retained for further consideration
Source: RS&H, 2024; City of Fresno, 2024; CTBX, 2024

at this distance from the existing facility would not be expected to result in disruptions to airside operations, including ongoing ATC operations, or result in vibration or construction emissions effects that could affect the integrity of the structure or otherwise adversely affect ATC operators onsite or create safety hazards for aircraft, employees, or passengers. Therefore, Alternative 3 would not have a material effect on airfield operations, including ATC operations. However, because Alternative 3 is located 1,340 feet away from the existing ATCT and there are no existing structures or utilities at this location, major trenching and utility relocation would be required, resulting in the potential for disruption in landside operations from the development of additional landside infrastructure to operate a facility at this location.

Therefore, due to the height of the structure and the condition of the site, this alternative would result in disproportionately higher costs of construction when compared to other alternatives, would be subject to unavoidable complex site conditions, and would result in higher costs due to construction methods or materials, and would have a longer construction duration. Therefore, this alternative would not be reasonable to construct.

4.3.2.3 Alternative 4: Site 13A, with Option C

Alternative 4, Option C would require the construction of a new ATCT approximately 167 feet tall with an additional 23 feet of height from antennas extending above the cab for a total of 190 feet and demolition of the existing ATCT. The proposed height of the structure at 167 feet is comparable to the height that would be required under Alternative 1. Additionally, as the site is developed, the construction of this alternative would not involve complex site conditions, such as extensive grading or the relocation of utilities from another location at the Airport. The new ATCT facility would be constructed adjacent to existing buildings, so utility connections are accessible in close proximity and would not require extensive trenching or the need to extend existing utilities from offsite to reach the site of the new ATCT. Therefore, neither the height of the structure nor the condition of the site would result in disproportionately higher costs of construction when compared to other alternatives and this alternative would be reasonable to construct.

Alternative 4, Option C would require the construction of a new ATCT facility approximately 140 feet southwest of the existing facility and demolition of the existing ATCT upon full operation of the new ATCT. Construction of a new facility at this distance from the existing facility could be expected to result in disruptions to ATC operations from vibrations, construction noise, construction emissions, or staging. Vibrations generated by construction activity may cause damage, such as cracking, to structures and have the potential to disrupt the operation of vibration-sensitive equipment (Caltrans, 2020). Ground vibration can also result in annoyance to a person that can disrupt concentration. Because of the close proximity of Alternative 4 to the existing ATCT, it was determined that Alternative 4 could introduce potential conflicts or hazards that could interrupt ATC operations. Therefore, this alternative is considered to be less viable than other alternatives.

4.3.2.4 No Project Alternative

While reasonable to implement because no construction would occur, under the No Action Alternative, the existing parallax issue for ATCs looking at Runways 29R and 29L that does not allow them to determine if a pilot is lined up to land on the correct runway would continue to exist. Therefore, this alternative would have a material effect on airfield operations and not be

reasonable to implement. Although the No Project Alternative would not meet the Factor 2 Screening criteria, it is carried forward to Factor 3 Screening as required under CEQA.

4.3.2.5 Summary of Factor 2 Screening Process

Table 4-2 provides a summary of the Factor 2 Screening for the alternatives that were carried forward from Factor 1 Screening

Table 4-2: Factor 2 Screening Results

Screening Criteria	Alternative 1: Site X2, Option C (Proposed Project)	Alternative 3: Site X1	Alternative 4: Site 13A, Option C	No Project Alternative
Minimal Effect on Airfield Operations	Yes	Yes	No	No
Reasonable to Construct	Yes	No	Yes	No
Move to Factor 3 Screening?	Yes	No	No	Yes/a/

/a/ Required by CEQA to be retained for further consideration
Source: RS&H, 2024; City of Fresno, 2024; CTBX, 2024

4.3.3 Factor 3 Screening

The two alternatives that were carried forward from Factor 2 Screening, Alternative 1, Option C (Proposed Project) and the No Project Alternative, were evaluated under Factor 3 Screening based on the potential to result in direct or indirect effects to historic resources.

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

Alternative 1, Option C would result in the demolition of the NRHP-eligible existing ATCT, which would be considered a potentially significant effect on a historic resource, as described in **Section 3.6.5.1**. Implementation of the mitigation measures included in the MOA would minimize the loss of features of the existing ATCT under the Proposed Project by retaining a record of the demolished resource and providing an interpretive opportunity to the public to learn about the resource. However, the mitigation would not effectively reduce the impact associated with loss of historical resources to a less-than-significant level under CEQA.

4.3.3.2 No Project Alternative

Under the No Project Alternative, construction of the Proposed Project would not occur and the existing ATCT would not be demolished. Regular maintenance and repairs would continue to occur on the existing ATCT. No effects to historical resources would occur.

4.3.3.3 Summary of Factor 3 Screening

and **Table 4-3** provides a summary of the Factor 3 Screening for the alternatives that were carried forward from Factor 2 Screening. None of the alternatives analyzed in **Section 4.3** can both meet the project objective and avoid significant effects to historical resources.

Table 4-3: Factor 3 Screening Results

Screening Criteria	Alternative 1: Site X2, Option C (Proposed Project)	No Project Alternative
Environmental Impacts (are the impacts the same or less than the Proposed Project?)	**Yes**	**Yes**
Analyze in EIR?	**Yes**	**Yes**/a/

/a/ Required by CEQA to be retained for further consideration
Source: RS&H, 2024

4.4 No Project Alternative

The No Project Alternative would not include the demolishing of the existing ATCT facility nor would it include any major renovations or repairs to the existing facility. The existing ATCT would continue to be used for ATC operations. The City would not construct a new ATCT facility, new equipment would not be installed, and no other improvements would be made at the site. The City would continue to pay for regular maintenance and repairs to infrastructure, equipment, and systems that break down. The facility would not meet current FAA space and height requirements, and it would not be brought up to State and local building requirements.

Without any development of a new ATCT, the inability for ATC operators to have direct line of sight of the aircraft apron located immediately east of the terminal would continue to create potential risks, including aircraft incursions, and delayed ATC pilot instructions. This alternative would fail to achieve project objectives.

4.4.1 Environmental Impacts

No construction as identified with the Proposed Project would occur under the No Project Alternative, so no construction-related environmental impacts would occur. Because an ATCT would still be under operation at the Airport, environmental impacts associated with operations would be similar if not identical.

4.4.1.1 Aesthetics

The aesthetics associated with the No Project Alternative would be the same as those described for the existing conditions and it would not have a substantial adverse effect on a scenic vista; substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; conflict with applicable zoning and other regulations governing scenic quality; or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.4.1.2 Agriculture / Forest Resources

Neither the No Project Alternative nor the Proposed Project would have an effect on agriculture and forest resources.

4.4.1.3 Air Quality

Under the No Project Alternative construction of the Proposed Project would not occur. Therefore, there would be no construction emissions. A new ATCT would not be constructed and the existing ATCT would not be demolished. Regular maintenance and repairs would continue to occur on the existing ATCT, resulting in emissions equal or similar to those

occurring today. No changes to aircraft operations at the Airport would occur. The No Project Alternative would have no new effects on air quality.

4.4.1.4 Biological Resources

Neither the No Project Alternative nor the Proposed Project would have an effect on biological resources.

4.4.1.5 Cultural and Tribal Resources

Under the No Project Alternative, the existing ATCT, which is eligible for listing on the NRHP, would not be demolished. There would be no potential to unexpectedly encounter any tribal resources during construction.

4.4.1.6 Energy

Under the No Project Alternative, the existing ATCT would not be replaced and demolished, and energy consumption would remain the same. The No Project Alternative would not result in any new effect on energy supplies.

4.4.1.7 Geology and Soils

No disturbance of soils or substantial erosion would occur under the No Project Alternative. The potential to expose people or structures to risk related to seismic hazards would be higher under the No Project Alternative than the Proposed Project because the existing ATCT is not up to current seismic or fire safety standards.

4.4.1.8 Greenhouse Gas Emissions

Under the No Project Alternative construction of the Proposed Project would not occur and would not generate GHG emissions. Regular maintenance and repairs would continue to occur on the existing ATCT, resulting in GHG emissions equal or similar to those occurring today. The No Project Alternative would not change existing ATCT emissions at FAT or emit additional GHGs. Under the No Project Alternative, energy efficiency, resource usage, and GHG emissions at the existing ATCT would remain unchanged.

4.4.1.9 Hazards and Hazardous Materials

Under the No Project Alternative, regular maintenance and repairs would continue to occur on the existing ATCT, which would not introduce new types of hazardous materials. In addition, no excavations relating to the Proposed Project would occur that could potentially encounter hazardous materials. The current ATCT was built in 1961 and, based on the results of the Phase I ESA (see **Appendix D**), potential safety concerns associated with leaving the existing tower in place include the following:

- Continued possible exposure of employees to lead-based paint. Lead-based paint was used extensively prior to 1978 and leaving the paint in place would increase the risk of exposure to employees as the paint deteriorates posing a potential danger to human and environmental health.
- Continued possible exposure of employees to PCBs. PCBs were manufactured in several construction and industrial materials between 1929 and 1979. Leaving PCB containing materials in place increases the risk of employee exposure over time as materials deteriorate.

4.4.1.10 Hydrology and Water Quality

Under the No Project Alternative, there would be no ground surface alterations or modifications that would change drainage patterns associated with the Airport drainage system and watersheds. In addition, the groundwater basin would not be disturbed or altered.

4.4.1.11 Land Use and Planning

Neither the No Project Alternative nor the Proposed Project would have an effect on land use and planning.

4.4.1.12 Mineral Resources

Neither the No Project Alternative nor the Proposed Project would have an effect on mineral resources.

4.4.1.13 Noise

Under the No Project Alternative, there would be no construction-related noise impacts. Regular maintenance and repairs would continue to occur on the existing ATCT, which would not result in any perceptible noise changes. Noise levels would remain the same and there would be no change to existing noise conditions. No effects from noise are anticipated from the No Action Alternative.

4.4.1.14 Population and Housing

Neither the No Project Alternative nor the Proposed Project would have an effect on population and housing.

4.4.1.15 Public Services

Neither the No Project Alternative nor the Proposed Project would have an effect on public services.

4.4.1.16 Recreation

Neither the No Project Alternative nor the Proposed Project would have an effect on recreation.

4.4.1.17 Transportation

Neither the No Project Alternative nor the Proposed Project would have an effect on transportation.

4.4.1.18 Utilities and Service Systems

Under the No Project Alternative, construction would not occur, so there would be no temporary increase in solid waste produced. The No Project Alternative would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

4.4.1.19 Wildfire

Neither the No Project Alternative nor the Proposed Project would have an effect wildfire.

4.4.1.20 Cumulative Impacts

The No Project Alternative would not contribute considerably to any cumulative impacts related to aesthetics, agriculture / forest resources, air quality, biological resources, cultural and tribal resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public resources, recreation, transportation, utilities and service systems or wildfire.

4.4.1.21 Ability to Meet Project Objectives

The No Project Alternative would not provide an ATCT facility that meets current FAA, State, and local building standards and improves safety and operations at the Airport for ATCT operators and Airport users. Therefore, the No Project Alternative does not meet the project objective. However, this alternative is being retained for further consideration as required by CEQA to serve as the environmental baseline for the evaluation of the other alternatives.

4.5 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative, that is, the alternative having the potential for the fewest significant environmental impacts, from among the range of reasonable alternatives that are evaluated.

The environmentally superior alternative is the No Project Alternative. It would have the fewest environmental effects but would not meet the project objective.

The CEQA Guidelines require that if the No Project Alternative is the environmentally superior alternative, another alternative must also be identified as the environmentally superior alternative. Therefore, the Proposed Project is the environmentally superior alternative. The Proposed Project would result in one significant impact that cannot be reduced to less than significant. The Proposed Project is considered to be the environmentally superior alternative because it meets the project objective outlined in **Section 2.5** with the least amount of environmental impact.

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5 Impact Overview

5.1 Significant and Unavoidable Adverse Impacts

As required by Section 15126.2(b) of CEQA Guidelines, this section identifies impacts of the Proposed Project that could not be eliminated or reduced to a less-than-significant level with the incorporation of mitigation measures identified in the EIR.

The potential impacts associated with the Proposed Project are described in detail in **Chapter 3**. The Proposed Project would result in one significant cultural resources impact due to the demolition of the existing ATCT. Mitigation measures have been identified to reduce these impacts where feasible. However, even with the implementation of these mitigation measures, this impact would still be considered significant and unavoidable.

All other potentially significant impacts of the Proposed Project would be reduced to a less-than-significant level with the implementation of mitigation measures identified in the EIR.

5.2 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires that significant irreversible environmental changes caused by a project be addressed in an EIR. Specifically, the EIR must consider whether "uses of non-renewable resources during the construction and operational phases of the project may be irreversible since a large commitment of such resources makes removal or non-use thereafter unlikely" or whether land use changes would permanently restrict any future development. A discussion of such changes is described below.

The Proposed Project would require the use of fuels and energy resources such as electricity, natural gas, and transportation-related fuels to perform all activities associated with construction and operation of the Proposed Project (refer to **Sections 3.7 and 3.15** for a discussion of energy impacts). As described in **Sections 3.7 and 3.15**, there are sufficient resources to serve the Proposed Project and existing initiatives, regulations, and sustainability measures regarding non-renewable resources would ensure that resources are used efficiently. However, the use of non-renewable resources associated with construction and operation of the Proposed Project would be considered an irreversible effect.

5.3 Growth-Inducing Impacts

This section discusses the ways in which the Proposed Project could foster economic or population growth. Growth-inducing impacts are caused by those characteristics of a project that tend to foster or encourage population and/or economic growth. Inducements to growth include the generation of construction and permanent employment opportunities in the support sector of the economy. A project could also induce growth by lowering or removing barriers to growth or by creating an amenity that attracts new population or economic activity.

In accordance with Section 15126.2(d) of the CEQA Guidelines, an EIR must:

> Discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population

growth. Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Two issues must be considered when assessing the growth-inducing impacts of the Proposed Project:

- Elimination of obstacles to population growth: the extent to which additional infrastructure capacity or a change in regulatory structure would allow additional development in the Airport vicinity; and
- Promotion of economic growth: The extent to which the Proposed Project can cause increased activity in the local or regional economy. Economic impacts can include direct effects, such as the direction and strategies implemented within the Airport vicinity, and indirect or secondary impacts, such as increased commercial activity needed to serve the additional population projected from the Proposed Project.

5.3.1 Elimination of Obstacles to Population Growth

The elimination of either physical or regulatory obstacles to population growth is considered to be a growth-inducing impact. A physical obstacle to population growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas not currently provided with these services is expected to support new development. Similarly, the elimination of or change to a regulatory obstacle, including existing growth and development policies, can result in new population growth.

The Proposed Project neither extends public service infrastructure into new areas nor eliminates or changes a regulatory obstacle that could result in new population growth. Current local land use plans and policies are the guiding force on whether future business and residential growth can be accommodated by the existing infrastructure facilities and services within the vicinity of the Proposed Project. Development at the Airport is not directly related to future development and growth potential within the region or local area. The Proposed Project does not include the development of new housing or population-generating uses or infrastructure that would directly encourage such uses. Instead, the Proposed Project is designed to replace an existing structure, the existing ATCT, that has exceeded its useful life with an ATCT facility that meets current FAA, State, and local building standards and improves safety and operations at the Airport for ATCT operators and Airport users.

5.3.2 Growth Inducement

Growth inducement may constitute an adverse impact if the growth is not consistent with the land use and growth management policies for the local jurisdictions. The Proposed Project would replace an existing facility at the Airport and would not result in an increase in passengers at the Airport or result in additional economic growth in the Airport vicinity. Therefore, no indirect effect of growth would occur in the Airport vicinity.

The Proposed Project would create new short-term employment opportunities. During construction, design, engineering, and construction-related jobs would be created. This would be a temporary situation, lasting until construction is completed. Construction workers would likely come from the existing large labor pool within Fresno County and would not result in new workers relocating to the area. As such, build out of the Proposed Project is not expected to encourage any development or growth in addition to, or in conflict with, the adopted plans.

5.4 Cumulative Impacts

According to Section 15130 of the CEQA Guidelines, an EIR shall discuss the cumulative impacts of a Proposed Project. A cumulative impact consists of an impact that is created as a result of the combination of the Proposed Project evaluated in the EIR together with other projects causing related impacts.

The cumulative impact study area was developed by starting with the entire Airport and then expanding to existing logical boundaries surrounding the Airport. The boundary was expanded to E. Dakota Avenue to the North, N. Clovis Avenue to the east, E. McKinley Avenue to the south, and N. Chestnut Avenue to the west (see **Figure 5-1**).

There are a variety of existing and reasonably foreseeable projects in the cumulative study area (see **Table 5-1**). Other projects in the cumulative study area were identified by using federal, State, and local agency websites, such as from the City of Fresno, Fresno County, and Caltrans. On-Airport projects were identified from the Airport's Capital Improvement Program (CIP) and information provided by Airport staff.

5.4.1 Aesthetics

The Proposed Project would be visible from public roadways within the cumulative study area. The general view would continue to be of an airport and of aviation activity. However, the Proposed Project would have a less than significant impact to scenic vistas due to the distance to the nearest scenic vista (Spano Park, approximately 7.2 miles northwest of the project study area), would not substantially damage scenic resources, would not conflict with applicable zoning and other regulations governing scenic quality, and would not create a new source of substantial light or glare. The Proposed Project and reasonably foreseeable future Airport projects would be expected to be constructed in a similar design to existing infrastructure at the Airport. Therefore, the Proposed Project would not have a cumulatively considerable contribution to aesthetics impacts.

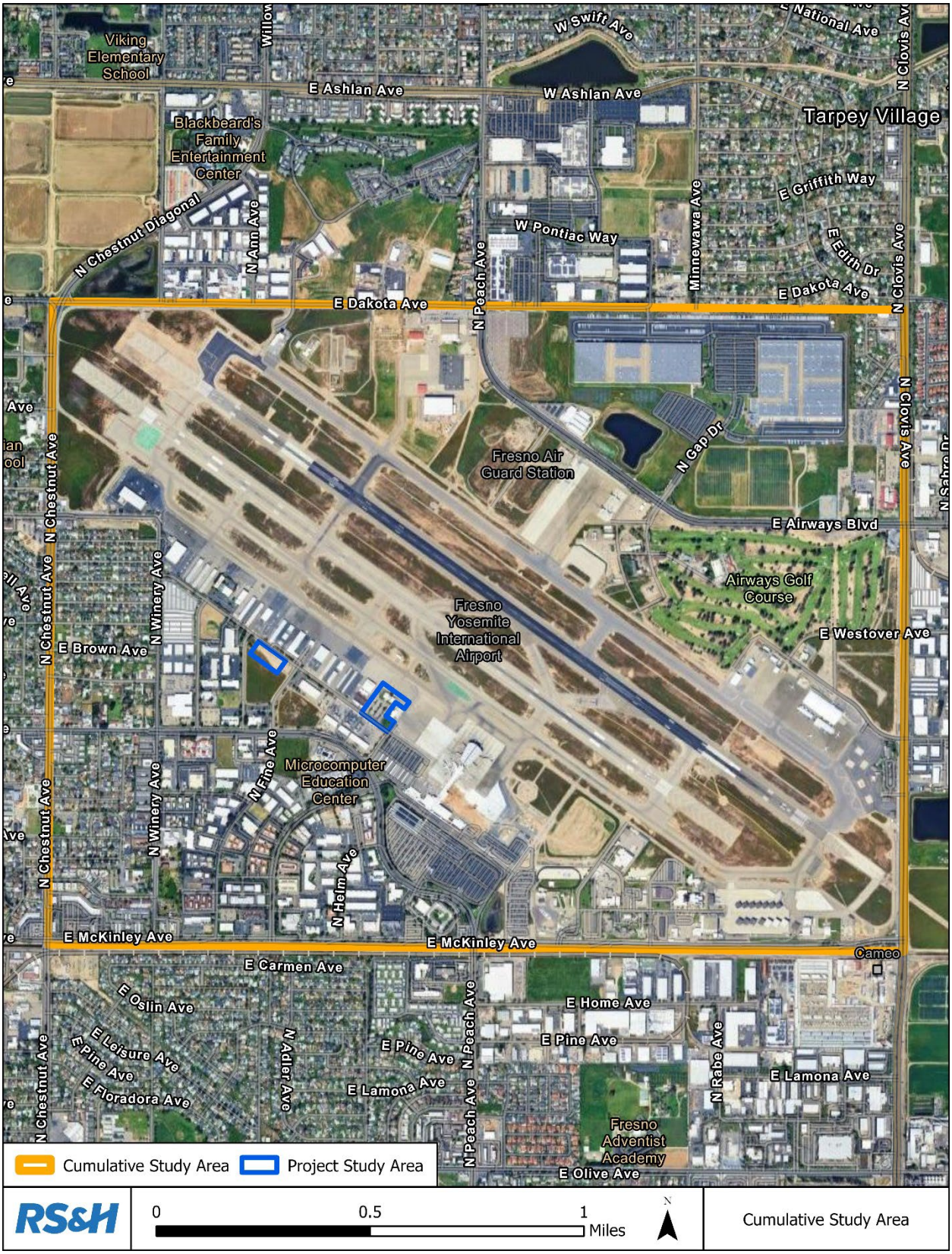
5.4.2 Agriculture / Forest Resources

The Proposed Project is not located within are near agricultural or forest lands; there would be no impact. Therefore, the Proposed Project would not contribute to a cumulative effect on agricultural or forest resources.

5.4.3 Air Quality

The cumulative study area for Air Quality is the SJVAB. Construction of reasonably foreseeable future actions may coincide with the Proposed Project. The Proposed Project, in addition to existing and reasonably foreseeable future actions listed in **Table 5-1** would result in temporary

Figure 5-1: Cumulative Study Area



Source: RS&H, 2024

Table 5-1: Cumulative Projects

Project	Project Location	Project Description	Project Type	Construction Years
On-Airport Projects				
Taxiway B Rehabilitation	Airport	Rehabilitate Taxiway B pavement	Infrastructure	2024-2025
Terminal Expansion Program	Airport	Terminal expansion adding 97,000 sq ft concourse to the existing terminal, with expanded TSA checkpoint, circulation halls, concession spaces, 2 hold rooms and a federal inspection station with dedicated arrivals atrium that deconflicts lobby congestion for the international passengers' meet & greet.	Building	2024-2025
Runway 11L/29R Reconstruction	Airport	Reconstruct the main runway at FAT, Runway 11L/29R	Infrastructure	2025-2027
RTR Relocation	Airport	Relocate the remote transmitter/receivers (RTR) for air traffic control and other radio communications following the terminal expansion.	Building	2028
ARFF Station Replacement Project	Airport	Construct a new ARFF station and demolish the old ARFF station.	Building	2028-2029
Off-Airport Projects				
None Identified in the Cumulative Study Area				

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

construction emissions. However, the SJVAPCD requires that all projects include adequate measures to minimize fugitive dust through its permitting and State-required environmental processes. The proposed reconstruction of Runway 11L/29R would occur in a similar timeframe as the Proposed Project and would result in a temporary increase in air pollutant emissions during the reconstruction of the runway. However, as with all cumulative projects considered in this EIR, the reconstruction of the runway would be required by SJVAPCD to comply with the conditions of its rules and regulations. Additionally, each project identified in **Table 5-1** would be required to implement BMPs to reduce construction emissions, as required by federal, State, and local laws. Therefore, while these projects could be under construction at the same time and the Proposed Project would contribute to an increase in construction emissions, the Proposed Project's contribution to cumulative air quality effects is not expected to be cumulatively considerable. This is because the Proposed Project would not have a significant effect on air quality and the temporary, periodic impacts associated with construction would be minimized through the use of environmental controls that would reduce construction emissions.

Operation of the Proposed Project would not result in a significant increase in emissions because it would replace an existing building with a more modern, energy efficient building, and would not increase landside or airside capacity at the Airport. Additionally, the Proposed Project

would not result in a change in aircraft operations (takeoffs and landings), and the existing runway configuration, arrival/departures procedures, and runway use percentages would remain unchanged. Therefore, the Proposed Project would not have a cumulatively considerable contribution to air quality impacts.

5.4.4 Biological Resources

The project study area does not provide suitable habitat for special-status animal species. Additionally, no aquatic resources, riparian habitat, or other sensitive natural communities occur within or near the project study area. There would be no impact to biological resources as a result of implementation of the Proposed Project. Therefore, the Proposed Project would not contribute to a cumulative effect on biological resources.

5.4.5 Cultural and Tribal Resources

For archaeological and tribal resources, the Cultural Resources Assessment reported negative results of the records search for archaeological resources and determined that due to the severely disturbed/obscured nature of the project study area, there has very low sensitivity for archaeological resources. All cumulative projects listed in **Table 5-1** occur on previously paved and/or graded surfaces and are unlikely to contain buried archaeological or tribal resources within the construction footprints. Thus, the Proposed Project's contribution to a cumulative impact to archaeological or tribal resource would not be cumulatively considerable.

The Proposed Project would demolish the existing ATCT which is eligible for listing on the NRHP, resulting in a significant and unavoidable impact. All cumulative projects listed in **Table 5-1** occur on previously paved and/or graded surfaces and are unlikely to contain NRHP-eligible resources within or in the vicinity of the construction footprints. As such, none of the cumulative projects listed are anticipated to affect NRHP-listed or NRHP-eligible properties and would not result in cumulative effects to significant built-environment cultural resources within the cumulative study area beyond those resulting from the Proposed Project. Therefore, the Proposed Project would not result in additional impacts to the built environment.

5.4.6 Energy

The Proposed Project and the projects in **Table 5-1** would require energy for construction and operation. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers and vendors traveling to and from the project study area. Electricity would be used during construction to provide temporary power for lighting, electronic equipment, and certain construction equipment. Construction of the Proposed Project would comply with all applicable federal, State, and local energy regulations identified in **Section 3.7.1** to ensure that the use of energy resources is minimized. Therefore, construction-related electricity use would generally be considered temporary and negligible over the long term

The Proposed Project would be constructed in compliance with Title 24, Chapter 6, including the use of energy efficient modern building materials and construction practices. The Proposed Project would also use new modern appliances and equipment, in accordance with the CCR Title 20. In addition, the Proposed Project would comply with federal, State, and local energy

efficiency policies and would operate more energy efficiently than the existing outdated ATCT. The existing ATCT would be demolished following the completion of the new ATCT, so it would no longer consume energy. Additionally, because the Proposed Project would replace an existing facility with no expansion of use, there would be no change to operational VMT that would result in additional use of fuel. Therefore, the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation, and the Proposed Project would not have a cumulatively considerable contribution to energy resource impacts.

5.4.7 Geology and Soils

All of the projects listed in **Table 5-1** and the Proposed Project would be exposed to similar geologic hazards such as surface rupture, strong ground shaking, liquefaction, erosion or loss of topsoil, and expansive soils. All of the projects listed in **Table 5-1**, like the Proposed Project, would incorporate appropriate BMPs to minimize erosion or loss of topsoil and be designed in accordance with building standards such as CBC and ASCE Minimum Design Loads and Associated Criteria for Buildings and Other Structures. Therefore, the Proposed Project would not have a cumulatively considerable contribution to geologic and soil impacts.

5.4.8 Greenhouse Gas Emissions

The cumulative study area for Climate is the SJVAB. Construction of reasonably foreseeable future actions may coincide with the Proposed Project; however, the Proposed Project would not result in a significant contribution to climate effects. The SJVAPCD requires that all projects include adequate measures to minimize ozone precursors and GHGs through its permitting and State-required environmental processes. All cumulative projects considered in this EIR would be required by SJVAPCD to comply with the conditions of its rules and regulations. Additionally, the foreseeable state of the environment is not expected to change significantly over the limited construction duration. Therefore, the Proposed Project, when would not have a cumulatively considerable relative to GHG emissions.

5.4.9 Hazards and Hazardous Materials

Cumulative land use changes within the cumulative study area would have the potential to expose employees and airport travelers to chemical hazards through redevelopment of sites and structures that may be contaminated from either historical or ongoing uses. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Therefore, specific projects proposed in the cumulative study area would be required to undergo individual environmental review, including review of potential impacts related to hazards and hazardous materials that are applicable to that development site and proposed use.

Construction of the Proposed Project and demolition of the existing ATCT could disturb soils that potentially contain asbestos and PFAS and building materials that contain PCBs and lead. Demolition anticipated to occur under the Proposed Project would facilitate the safe removal of potentially hazardous building materials and the cleanup of contaminated areas, thus reducing the level of risk on a particular site in the nearby vicinity and within the project study area compared to existing conditions. In addition, construction of the Proposed Project would involve

the use of hazardous materials (e.g., fuels and solvents), and would temporarily generate solid waste. However, spill prevention, control, and countermeasure plans are enforced, as appropriate, as well as a hazardous materials business response plan. Additionally, measures identified in **Section 3.10.5.1** would be implemented to further reduce potential hazardous material impacts.

Projects listed in **Table 5-1** occur on Airport property, which would also require adherence to the State's NPDES General Industrial Permit and SWPPP that outlines construction BMPs for pollution prevention. Any hazardous substances generated or encountered during construction would be managed and disposed of by the contractor in compliance with federal, state, and local hazardous materials management guidelines.

Because cumulative projects would be fully regulated, thus reducing potential for public safety risks, impacts associated with exposure to hazards and hazardous materials would not be cumulatively considerable.

5.4.10 Hydrology and Water Quality

The region surrounding the Airport is already highly urbanized and densely developed with existing residential, commercial, and industrial sites. Projects within this region are expected to primarily involve redevelopment and many will require demolition of existing facilities prior to construction of new facilities, which would limit the net change in impervious surface area and the potential for significant hydrology and water quality impacts. Select projects have the potential to involve an increase in impervious surface area (particularly those occurring on existing vacant or undeveloped sites), although the extents are not known at this time.

Where applicable, new development and redevelopment within the region would be subject to similar environmental and stormwater regulations as the Proposed Project. For example, compliance with the CVRWQCB NPDES MS4 permit (Order No. R5-2016-0040-014). Under the MS4 permit, post-construction water quality control measures would be implemented as required under the FMFCD's *Fresno-Clovis Storm Water Quality Management Program* (Fresno Metropolitan Flood District, 2013). This MS4 permit includes similar requirements for post-construction stormwater management for new and redevelopment, industrial and commercial site controls, construction site runoff control, water quality monitoring, and TMDL compliance. Additionally, the federal, State, and local requirements described for the Proposed Project would be relevant as well, where applicable.

Compliance with these requirements would limit the risk for potentially significant impacts from these projects because each project would need to evaluate these potential risks and identify measures to be implemented to mitigate identified risks. Based on this, the potential contribution of the Proposed Project to cumulative impacts for hydrology and water quality would not be cumulatively considerable.

5.4.11 Land Use and Planning

The Proposed Project would not affect connectivity, divide an established community, or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. There would be no

impact and the Proposed Project would not contribute to a cumulative effect on land use and planning.

5.4.12 Mineral Resources

There are no known mineral resources within or near the project study area. There would be no impact and the Proposed Project would not contribute to a cumulative effect on mineral resources.

5.4.13 Noise

The Proposed Project, in addition to the projects listed in **Table 5-1** would result in temporary construction-related noise. Construction of reasonably foreseeable future actions may coincide with the Proposed Project. Because construction of the Proposed Project and other on-Airport projects could overlap, there is potential for cumulative construction noise to reach levels above those levels associated with construction of the Proposed Project. However, construction noise is temporary in nature and the nearest noise sensitive land uses are approximately 0.5 miles away (2,640 feet). In addition, because of the construction noise typically dissipates at a rate of approximately 6 dB for each doubling of distance (between the noise source and the receptor, which is the location that is representative of where the sound would be experienced (e.g., a residence), it is unlikely that the construction noise from the Proposed Project would be audible over the existing operational noise of the Airport.

Operation of the Proposed Project would not result in a change in aircraft noise exposure or surface traffic. Additionally, the Proposed Project would not result in any operational noise effects beyond what exists currently in the cumulative study area. Therefore, the potential contribution of the Proposed Project to noise would not be cumulatively considerable.

5.4.14 Population and Housing

The Proposed Project would not result in direct population growth nor would it necessitate the displacement or removal of existing housing. There would be no impact and the Proposed Project would not contribute to a cumulative effect on population and housing.

5.4.15 Public Services

The Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities. There would be no impact and the Proposed Project would not contribute to a cumulative effect on public services.

5.4.16 Recreation

The Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated nor would it require the construction or expansion of existing public

recreational facilities. There would be no impact and the Proposed Project would not contribute to a cumulative effect on recreation.

5.4.17 Transportation

The Proposed Project would not result in changes to surface traffic, transit, bicycle, or pedestrian facilities. There would be no impact and the Proposed Project would not contribute to a cumulative effect on transportation.

5.4.18 Utilities / Service Systems

5.4.18.1 Water/Wastewater

As previously described, the Proposed Project is required to comply with a variety of regulations and requirements that would minimize the risk of potential effects to water and wastewater. The risk of impacts from the Proposed Project alone on these significance criteria is less than significant. The Proposed Project was also reviewed in conjunction with a variety of upcoming projects in the region (**Table 5-1**) to evaluate the potential for cumulative impacts to water and wastewater. The Airport and the surrounding vicinity are already highly urbanized and developed with existing residential, commercial, and industrial land uses. Projects within this region are expected to primarily involve redevelopment and many require demolition of existing facilities prior to construction of new facilities. All of the cumulative projects are located within the same City DPU water supply and wastewater service area as the Proposed Project.

Many of the projects on the list are not expected to significantly affect water or wastewater utility demand, including airfield improvements and replacement facilities. Redevelopment projects may be able to use existing utility infrastructure, where feasible, if demands are not increasing relative to previous site developments. New infrastructure would need to be constructed in accordance with applicable local, regional, state, and federal environmental regulations (see **Section 3.19.1**), and construction within previously developed sites would limit the potential for environmental impacts.

Each new connection to a public utility would require coordination with the applicable utility agency to evaluate utility demand versus available capacity and establish the terms and conditions of their connection in the form of an agreement or permit. Projects would be required to comply with the requirements of the City, including requirements related to water-efficient fixtures or other water conservation strategies, which may also reduce the amount of wastewater generated.

As noted in **Section 3.19.4.3**, The Fresno-Clovis RWRF has a permitted treatment capacity of 91.5 mgd to secondary standards and a permitted treatment capacity of 5 mgd to tertiary standards. Of its 91.5 mgd treatment capacity, RWRF currently treats about 68 mgd of wastewater to secondary standards (City of Fresno, 2024j).

The potential for cumulative impacts to water and wastewater is minimized based on the Proposed Project location within an urbanized and developed region and the need to comply with the terms and conditions of the City and applicable environmental regulations. The potential

contribution of the Proposed Project to cumulative impacts for water and wastewater is not cumulatively considerable.

5.4.18.2 Solid Waste

The Proposed Project, when combined with the other cumulative projects, would increase the amount of solid waste generated through demolition and construction. However, all projects would adhere to State and local regulations related to solid waste diversion and the landfills within the County of Fresno have the capacity to accommodate the construction-related solid waste from the Proposed Project. Therefore, the temporary increase in solid waste during construction would not be significant.

Because the existing ATCT would be demolished following completion of the new ATCT, operation of the Proposed Project is not expected to generate additional solid waste beyond what is currently generated. Additionally, given the available capacity at the landfills, the additional solid waste generated by the Proposed Project is not anticipated to cause the facility to exceed its daily permitted capacity. As such, the Proposed Project would be served by a landfill with sufficient capacity to accommodate the facility's waste disposal needs; therefore, cumulative impacts associated with solid waste would not be cumulatively considerable**.**

5.4.19 Wildfire

The Proposed Project is not located in an area that has been designated as VHFHSZ. There would be no impact and the Proposed Project would not contribute to a cumulative effect on wildfire.

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6 Public Outreach and Coordination

CEQA requirements were considered and adhered to when conducting public involvement activities. The public involvement process was designed to inform the public and agencies about the Proposed Project, alert the public of the opportunity to raise environmental concerns, and provide the public with an opportunity to review and comment on the Proposed Project. By receiving and responding to public comments, the City was able to evaluate and address the public and agency concerns about the environmental effects of the Proposed Project and determine whether additional environmental analysis and mitigation measures were necessary as part of the preparation of the EIR.

Appendix A contains the public and agency comments received on the NOP during the public scoping period. **Appendix E** contains the notice of availability documentation for the release of the Draft EIR and the response to comments received during the public comment period.

6.1 Public Outreach Efforts

6.1.1 Scoping

A NOP, which informed the public and agencies that an EIR would be prepared, was published on March 22, 2024, and marked the beginning for a 30-day public comment period. The City conducted public outreach for the NOP and participated in a City HPC hearing to respond to questions from the HPC regarding the eligibility and proposed demolition of the existing ATCT. As a result of the scoping comments received from the HPC, Alternative 2 and Options A and B were developed to evaluate all options to avoid demolition of the existing ATCT. Other comments received during the scoping period were from CDFW, NAHC, and SJVAPCD. All comments received were considered during the preparation of the Draft EIR and have been incorporated, as applicable.

The NOP with associated Initial Study, advertisements, and comments received during the scoping period are documented in **Appendix A**.

6.1.2 Draft Environmental Impact Report

Publication of the Draft EIR began a public review and comment period that lasted for 45 days from September 10 to October 27, 2025, as required by Section 12105(a) of the CEQA guidelines. Upon publication, the Draft EIR was available to federal, State, and local agencies as well as to interested organizations and members of the public for review. Comments received during the Draft EIR public comments period are addressed and included in the Final EIR.

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7 References

1.1 Introduction Chapter

No references were used in this chapter.

1.2 Project Description Chapter

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U.S. DOT. (2008). *FAA's Management and Maintenance of Air Traffic Control Facilities.* Retrieved June 2024, from https://www.oig.dot.gov/sites/default/files/REVIEW_OF_FAA_FACILITIES.pdf

1.3 Existing Conditions, Environmental Impacts, and Mitigation Measures Chapter

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1.6 Public Outreach and Coordination Chapter

No references were used in this chapter.

1.7 List of Preparers Chapter

No references were used in this chapter.

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8 List of Preparers

8.1 City of Fresno

8.1.1 Fresno Yosemite International Airport

Henry Thompson, Director of Aviation (in memoriam)

Francisco Partida, Interim Director of Aviation

8.1.2 Planning and Development

Jennifer Clark, Director of Development

Ashley Atkinson, Assistant Director of Development

8.2 RS&H California, Inc.

Karin Bouler, Project Manager

Dave Full, AICP, Project Director and Quality Control

Audrey Hsu, Environmental Analyst

Matt Prevo, Environmental Analyst

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