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September 18, 2012

Marianne Biner, DERA Analyst
Sacramento County Environmental Review and Assessment
827 7th Street, Room 220
Sacramento, California 95814

Re: Comments on the Draft EIR for the Mather Airport Master Plan

Dear Ms. Biner:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report on the Mather Airport Master Plan. El Dorado County has serious concerns regarding the conclusions reached regarding noise impacts and the failure to consider a full range of alternatives. The focus of our review has been on Chapter 4- Alternatives and Chapter 9 – Noise. We also question the veracity of the basic assumption that the improvements will not significantly increase airport operations over the life of the plan. Specific comments are provided below.

Airport Growth Assumptions

The DEIR relies upon an analysis by Jacoby Consulting (Summary – Mather Airport Forecast Update, June 2008) to assert that the improvements proposed in the master plan will not significantly increase airport operations and add aircraft operations. That document was not made available so it is unclear how those conclusions were reached. However, it defies logic to believe that adding additional hangar and apron space and extending the runway will not increase the **potential** for a much higher level of operations.

Throughout the document, the DEIR relies on the assumption that future operations will be the same whether or not the proposed improvements are made. This puts into doubt the validity of any of the figures provided in the numerous tables and charts supporting the finding that the noise impact will be less than significant. The DEIR must analyze that potential for additional flights, not just what the current market demand may be projecting. With that, the entire analysis of noise impacts, particularly for jet cargo aircraft approaching from the east, is flawed. It should be based on the potential capacity of Mather Airport with the increased ability to use two runways, the increase in hangar space, the turn-over rate of flights that could occur based on the improved taxi-ways, and other airport and landside improvements proposed.

The idea that airport congestion and lack of adequate facilities will not deter significant growth in airport operations simply is not credible. The DEIR points out, with a statement buried on

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Page 9-59, that “as aviation activity grows at the airport, the existing facilities could become congested over time or result in a lower level of service to the aviation customer.” But the DEIR fails to take the next step and analyze how the converse of that statement will affect air traffic, particularly air cargo jets. Will the additional facilities and extended runway enable more air operations and what are the impacts of those potential arrivals and departures? That analysis is lacking in the DEIR and is, therefore, inadequate.

Alternatives

The DEIR rejects, as a feasible alternative, the use of Sacramento International Airport (SMF) as an alternative to expanding Mather Airport (Page 4-8.) Using somewhat circular logic, the DEIR states that use of that airport is inconsistent with the County’s Airport System Policy Plan which designates Mather for cargo uses. While it may be more expensive to add additional cargo capacity at SMF, the alternative should not have simply been rejected out of hand as infeasible. A comparative analysis of noise impacts of using SMF versus Mather would have provided useful information in which to inform the public and decision makers. Instead, the public is left in the dark about what the impacts would be over the decision to direct cargo operations to Mather.

Noise Thresholds of Significance

The DEIR relies upon Sacramento County General Plan Noise Policies to determine the threshold of significance for noise impacts. However, noise impacts are felt beyond the boundaries of Sacramento County. Sacramento County’s policies, cited in the DEIR, are solely intended to prevent the location of noise sensitive uses near airports. (See Pp. 9-12 through 9-19 of the DEIR.) El Dorado County’s General Plan, on the other hand, is intended to protect noise sensitive uses from noise sources. Goal 6.5, Objective 6.5.1, and Policy 6.5.1.1, provided below, clearly articulate this policy objective.

GOAL 6.5: ACCEPTABLE NOISE LEVELS
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Ensure that County residents are not subjected to noise beyond acceptable levels.

OBJECTIVE 6.5.1: PROTECTION OF NOISE-SENSITIVE DEVELOPMENT

Policy 6.5.1.1 – Protect existing noise-sensitive developments (e.g., hospitals, schools, churches and residential) from new uses that would generate noise levels incompatible with those uses and, conversely, discourage noise-sensitive uses from locating near sources of high noise levels.

El Dorado County acknowledges in Policy 6.5.1.9 that airport noise is excluded from the regulatory aspects of its policies due to federal and state preemption, however, the DEIR must recognize that noise impacts to existing noise sensitive uses are important to the County. Furthermore, as El Dorado County is more rural than much of Sacramento County, the ambient noise levels are typically lower. El Dorado County recognizes this by adopting lower standards for non-transportation noise sources, especially at night. The adopted standards are contained in El Dorado County General Plan Table 6-2 as shown below:

Noise Level Descriptor	Daytime 7 a.m. - 7 p.m.		Evening 7 p.m. - 10 p.m.		Night 10 p.m. - 7 a.m.	
	Community	Rural	Community	Rural	Community	Rural
Hourly L _{eq} , dB	55	50	50	45	45	40
Maximum level, dB	70	60	60	55	55	50

These noise thresholds must be taken into consideration when determining the level of significance for noise impacts, despite the fact that there are no regulatory requirements associated with these standards as they are applied to aircraft noise.

Confusing or Misleading Data

The DEIR contains numerous tables providing a wealth of data, however, it is difficult to separate the important data from the background noise of endless figures. Nowhere is there a clear table that shows the arrival and departure times (aggregated by day, evening, and nighttime) of air cargo jet aircraft, which as acknowledged in the DEIR is one of, if not the loudest and most disruptive aircraft utilizing Mather. Table NS-5 on Page 9-23 shows the total number of operations by average annual day (AAD). But this only provides a part of the information necessary to gauge the noise impacts. If the majority of Air Carrier Jets arrive at night, as shown on Table NS-8 (page 9-27), when ambient noise is much lower than during the day, then the impact of these operations are much greater. A more detailed analysis of this specific operation is necessary to determine the impact of noise on residents in El Dorado County.

The numbers are further obscured in the discussion on Page 9-43 attempting to explain how the airport improvements won't have a significant change to air carrier jet traffic in 2015. The DEIR utilizes a 2% reduction of cargo jet traffic if the runway is not extended, based on the presumed operations in the future, but then combines that number with the total AAD operations for the airport. This substantially dilutes the effect of jet aircraft operations noise. But neither the discussion nor the tables accurately describe air carrier jet arrival and departure differences, let alone the potential differences, if the second runway is not extended. This same explanation is utilized again on Page 9-57 for the 2025 project conditions, with the same inadequate explanation of potential noise impacts resulting from the increase capacity of the facilities.

Limited Readings of Single Event Noise Analysis

On Page 9-93, under the heading of CEQA Significance Criterion, the DEIR points out that Federal law and grant funding rules restrict the ability of an airport to limit or restrict aircraft operations. This is used as justification that no mitigation can be imposed and that single event noise information is provided for “information only.” While the limitations imposed by Federal law may limit the ability to apply mitigation measures, it does not obviate the fact that there will, in fact, be noise generated by the airport operations, which must be addressed in the DEIR. By simply stating there is nothing that can be done about it relieves Sacramento County from attempting to identify feasible alternatives or measures that could reduce the impacts within the scope allowed under federal law.

The information provided in the DEIR on single event noise is limited due to the limited observations made in the investigation of noise over El Dorado County. Only three stations made noise readings at night, and then only for a period of 48 hours. That limited period of time is wholly inadequate to obtain an adequate reading of nighttime flights over residential areas. One of the biggest problems with noise from Mather operations today is the inconsistent manner in which aircraft approach the airport. When flying the ILS approach, the noise levels probably reflect the figures provided in Table NS-50 (Page 9-118.) However aircraft vary from the ILS on a regular basis, for which El Dorado County and SACS receive regular complaints. Did those 48-hour readings include any such events? This is unknown as the DEIR does not discuss this in any way. Table NS-21 shows a 30.7% increase in projected air carrier cargo operations in 2025 over the existing conditions. (This does not include the **potential** increase which El Dorado County suggests should be analyzed.) Even that amount of increase will be significant to the residents of El Dorado Hills and Rescue, who are awoken regularly during nighttime hours by errant aircraft, flying lower than the recommended approach pattern. The analysis of single event noise is wholly inadequate and must include a longer period of monitoring and a broader area of noise monitoring.

Summary

El Dorado County finds that the DEIR for the Mather Airport Master Plan is inadequate in its analysis of alternatives and single event noise impacts. The conclusions rely on assumptions that are inconsistent with the purpose of CEQA, which is to analyze the potential impacts of an action and to disclose to the public the effects of and possible mitigation measures to those impacts. Additional testing is necessary to complete the analysis of single event noise over El Dorado County. Comparison of existing conditions to the possible increases in airport operations resulting from the improvements and expansion of facilities is necessary, as is a comparison of real alternatives to expansion of Mather Airport.

Sincerely,
County of El Dorado

John R. Knight, Chair
Board of Supervisors
County of El Dorado