

# COUNTY OF EL DORADO

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July 23, 2013

Catherine Hack, Environmental Coordinator  
County of Sacramento  
Department of Community Development  
Planning and Environmental Review Division  
827 7<sup>th</sup> Street, Room 220  
Sacramento, CA 95814

Re: Notice of Preparation of a Draft Environmental Impact Report for Revised Mather Airport Master Plan

Dear Ms. Hack:

This letter is in response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Revised Mather Airport Master Plan. The County is concerned about the potential impact to residents in the Communities of El Dorado Hills, Cameron Park, Rescue, and the rural residential areas under the approach to Mather Airport. In particular we want to ensure that the DEIR fully analyzes the impacts of single event noise impacts on residential areas in the County of El Dorado.

The DEIR should quantify the potential increase in air traffic from cargo flights that could occur as a result of the improvements planned with the Master Plan. The analysis should also take into consideration marketing strategies employed by Sacramento County Airport Systems to increase air cargo traffic, and address anticipated times and flight patterns. The increase in flights will have a direct impact on the number of single-event noise occurrences, which will have an adverse effect on the health and enjoyment of property of County of El Dorado residents. The DEIR must also identify adequate and appropriate mitigation measures to reduce the impact from the increase in noise events.

Additionally, the DEIR should provide a range of alternatives, including the use of other airports within the system for air cargo operations that would not increase the noise and air quality impacts on long-established residential areas. Simply rejecting out-of-hand the use of Sacramento International Airport because it is not a part of the County's plan does not provide a reasonable range of alternatives nor does it provide full disclosure to the public and decision makers of reasonable options.

The DEIR must also analyze the potential increase in airport operations that could be accommodated by the improvements proposed in the Master Plan. Previous analysis relied on market studies that suggested that there would be a limited increase in flights and the amount of cargo shipped through Mather. Yet the improvements would allow a much higher level of activity.

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Statements on the Sacramento County Airport System (SCAS) website, made by various Sacramento County staff, and several studies prepared on behalf of the County support a much higher potential for growth at Mather Airport. One such study, prepared by Leigh Fisher Associates (*Mather Air Cargo Operations Capability*), estimates that Mather could accommodate at the planned build-out of landside facilities 25,550 air cargo operations. This is substantially greater than the 6,534 operations used in the previous DEIR analyses. It appears that the intent of the County is to develop Mather Airport as a cargo hub, as attested by its aggressive marketing to air cargo companies, statements in the Sacramento County General Plan, and as quoted in *Comstock's* magazine. According to that article, the County is working to have FedEx relocate from Sacramento International Airport (SMF) to Mather, as well as negotiating with UPS to move its mini hub from Ontario Airport. (*Comstock's*, Aug. 2004.) These potential moves would be facilitated by the upgraded airside and landside improvements proposed in the Revised Master Plan. The DEIR must consider this potential, and analyze the impacts associated with it.

The County of El Dorado looks forward to the release of the DEIR and to continue working cooperatively to resolve these concerns. If you have any questions, please contact Peter Maurer, Principal Planner, at (530) 621-5331 or [peter.maurer@edcgov.us](mailto:peter.maurer@edcgov.us).

Sincerely,

Ron Briggs, Chairman  
Board of Supervisors, County of El Dorado

Cc: Terri Daly, Chief Administrative Officer  
Kim Kerr, Community Development Agency Director  
Roger Trout, Development Services Director  
Peter Maurer, Principal Planner