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September 27, 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/Baseline

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 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.

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 DEIR analyses. 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. 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 Master Plan.

The DEIR further minimizes the potential use of the expanded runway by estimating that it would only be used as a backup to runway 22L and when air cargo would be diverted from SMF to Mather. That estimate is only 2%. The potential use of the extended runway could be much greater because it has the capacity for same direction, simultaneous operations under VFR conditions, which is 92% of the time (ATC Handbook 7110.65, Sec. 8.3-8-3.)

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. The DEIR uses erroneous assumptions to substantiate its rejection of SMF as a feasible alternative. One statement, “Cargo airplanes are traditionally delayed in favor of passenger planes.” is simply inaccurate. Scheduled carriers are given no priority based on contents of the aircraft.

There are a number of reasons that SMF could serve the cargo needs of Sacramento County as well as international carriers:

1. SMF already has three CAT III ILS approach courses and plans to create a fourth. Developing a single CAT III ILS approach at Mather is estimated to cost \$10 million. SMF already has parallel runways suitable to handle air cargo.

2. The SMF Master Plan calls for lengthening Runway 16L/34R to 11,000 feet. \$2 million was identified in the 2011-12 Capital Improvement Plan for design work on that runway extension.
3. SMF runways are spaced 6,000 feet apart allowing for dual simultaneous precision instrument approaches. This is greater spacing than at Mather.
4. SMF enplaned 33,000 tons of cargo in 2011 compared to 19,000 tons at Mather. The SMF Master Plan provides for enplaning 113,000 tons annually by expanding cargo building floor space and the adjacent apron. This is a 300% increase that is permitted under the existing master plan.
5. SMF is operating at 29% of capacity. The majority of cargo shipments are typically done at night, thereby avoiding conflicts with passenger flights.

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,



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

Cc: Sacramento County Board of Supervisors