

12-5-07

Please include this letter in
your hearing on this matter
December 11, 2007.

I sent this to Sacramento in mid
November.

2007 DEC -5 AM 11:28

RECEIVED
BOARD OF SUPERVISORS
EL DORADO COUNTY

I hereby request you enter
my name in the El Dorado
County board of supervisors
meeting as a person who is
strongly opposed to more
noise pollution.

Connie Peermow
5701 DISCOVERY WAY
Shingle Springs, CA
95682

V

Nov. 20, 2007

Joyce Horizumi

It has come to my attention that the Sacramento Board of Directors is considering new business for the Mather field airport.

Cargo jumbo jets

It goes without saying that this will increase noise pollution.

How may I ask, do you plan to address the thousands of people affected by this change without doing the E.I.R. in their flight patterns?

Much of El Dorado county will be right in this pattern.

With all due respect I am demanding you include these areas in your study. Folsom, El Dorado Hills, Colver Park, Shingle Springs, Fair Oaks, Elk Grove

RECEIVED
BOARD OF SUPERVISORS
EL DORADO COUNTY

2007 DEC -5 AM 11:18

I realize that ~~lots~~ lots of money is involved in this new project.

Do not forget also that this will effect thousands of peoples lives and their health.

How could you possible not take that into consideration?

Don't be so foolish to think no one will notice.. Also who knows whose house these monsters will fly over.

" Maybe one of you will be seeing or I should say hearing this noise. "

I sure hope so if you give you approval.

I think it's time for a Boston Tea Party. I have had enough,

Maximum Theoretic Capacity at Mather Airport

On April 19, 2006 the Board of Supervisors voted to include the “theoretic operational capacity” in the environmental studies for land use planning and for the draft Mather Airport Master Plan (MP). Theoretic airport capacity was defined as the maximum aircraft activity that can be accommodated at the ultimate build-out of the landside facilities. It is NOT the maximum number of operations that can occur in a single day, but an ANNUAL AVERAGE DAY based on the estimated capacity of landside facilities. The theoretic capacity is far less than the ultimate airport capacity - the annual service volume defined by FAA. This approach, which theoretically looks beyond the year 2021 MP horizon, is not tied to market forecasts.

Documentation of the theoretic capacity concept is contained in a June 2004 white paper by Leigh Fisher Associates (LFA) entitled “Mather Air Cargo Operational Capacity.” Operational capacity was assessed as the average number of aircraft operations that could be reasonably accommodated on the air cargo apron depicted in the MP. The number of average air cargo operations was calculated using the formula:

$$\text{Ave ops} = 2 \times (\text{number of parking positions}) \times (\text{turns/day/position})$$

A layout of a cargo apron based on the MP yielded 23 jet parking positions for integrated carriers (UPS, DHL, etc.) and 5 for all-cargo carriers (Polar, Evergreen, etc.). It was assumed that integrated carrier parking positions would support an average of 1.2 turns per day and that all-cargo positions would support 1.5 turns per day. This construct yielded 70 jet cargo operations per day as opposed to a 2021 forecast in the MP of 59 jet cargo operations per day.

Serious questions arise concerning the purpose and methodology of the “theoretic capacity” approach. If the purpose is to define noise contours beyond the year 2010 MP horizon, construction of facilities on the additional 300 acres of land reserved in the MP for future cargo activities must also be considered. For example, the FedEx facility at Oakland, which has 20 parking spots for jet cargo aircraft, occupies less than 60 acres, implying that another 100 parking positions could eventually be added at Mather. Moreover the turns per position per day numbers appear to be arbitrary. FedEx Oakland, for example, handles 70 to 80 operations on weekdays with 20 parking positions. Averaging those operations over a seven day week drops the number of turns per day from near 2 to about 1.4. Numeric manipulations like these are of little comfort to people experiencing aircraft noise.

Table 1 compares jet cargo operations per day gleaned from the MP with the “theoretic capacity” and the annual service volume. It is quite possible before 2021 to have a series of days – near Christmas, for example – when operations greatly exceed the “theoretic capacity” of 70. Freighter operations double that value are possible beyond the year 2021. These numbers are astonishing compared to the 13 operations per day in 2005.

The Myth of a "Backup" Runway

Sacramento County Airport System officials refer to extending the general aviation runway (22R/4L) as creating a "backup" or "redundant" cargo runway. Yet, Federal Aviation Administration officials have stated clearly that they don't fund or operate "backup" or "redundant" runways.

At the February 17, 2004 Board of Supervisors meeting, Mr. Leonard, SCAS COO, cited San Jose as an example of a redundant runway recently funded by FAA. The Board, perhaps comforted by his assertion, voted in favor of leaving the runway extension in the Master Plan. At the request of Mayor Miklos, Vincent Mellone, the City of Folsom's aviation consultant, investigated the validity of Mr. Leonard's claim. On February 27, 2004, Mr. Mellone reported, "I checked into the use of the newly extended runway 30R/12L at San Jose and found that it is used routinely for both arrivals and departures. I contacted the personnel at San Jose Tower and was told that they have no restrictions on its use... The FAA uses both runways at San Jose whenever the arrival volume requires and weather conditions permit parallel runway landings"

The Master Plan (p 8-6) states, "A small federal grant will be received in connection with the Runway 4L-22R extension project . . . A larger federal grant is not assumed for this project based on the assumption that it will not meet FAA benefit-cost analysis guidelines." FAA is right. Funding a "backup" runway makes no sense economically, and particularly so at Mather. With no snow and ice, accidents that would close the huge 11,300 foot long runway 4R/22L should be rare indeed, and the general aviation runway can also be used by lightly-loaded freightliners. To date almost all cases of diverting planes from Mather to International have been due to fog. According to Mr. Leonard, it costs the airline \$28,000 for each large cargo aircraft diverted. Consequently, it would take 600 of these rare events to equal the estimated cost of \$16.8 million for extending the general aviation runway to a length suitable for loaded cargo planes. Moreover, the \$16.8 million comes from the taxpayers; any savings would accrue to the private air carriers.

The existing Mather runway configuration will handle about 300,000 operations annually. (An operation is a takeoff or a landing. Obviously over time takeoffs must equal landings.) This translates into an approach and landing every 3.5 minutes. That capacity will meet Sacramento regional needs for decades to come. (Today, Oakland with a very similar runway configuration, handles ten times as much cargo as Mather.) However, the traffic peaks and tight schedules of a major West Coast Air Cargo Hub dictate even closer spacing. The Master Plan (Table 3-9) predicts traffic peaks as great as 40 cargo aircraft per hour for as many as five hours per day. That clearly is a busy two runway operation, and the reason the second cargo runway is being pushed by SCAS. They need it in order to create a major Hub.

So the "backup" runway is simply a second cargo runway, and, if built, it will be used as FAA sees fit.

Quotes Concerning a Mather Air Cargo Hub

At the first Mather Airport Master Plan Workshop roughly a half dozen speakers touted developing Mather as a major west coast air cargo hub. The rhetoric has been greatly toned down, but all features needed for a major hub are in the draft Mather Airport Master Plan and funding for those features is in the County Capital Improvement Plan budget. Here are some of the advocates' words:

1. "Our vision for Mather is it will be THE air cargo facility, a hub not just for this part of California, but for the Pacific Rim." Paul Hahn, Sacramento County Economic Development Director, Sacramento Bee, page D4, 2/14/97
2. "The desire is for Mather Airport to become the premier air cargo center for Northern California, serving both domestic and international markets." The "baseline scenario" assumes that "Air cargo operations are similar in magnitude to existing demands at Metropolitan Oakland International Airport." Noise Element of the Sacramento County General Plan, Adopted 12/15/93, Amended 6/24/1998 [*Oakland is California's second largest cargo airport*]
3. "On October 16, 2001 your Board adopted a resolution determining two potential roles for Mather Airport:
 1. Dedicated to cargo use with some general aviation uses.
 2. Dedicated to air cargo use with emphasis on facilities to support air cargo hub operations with some general aviation uses."C. Hardy Acree, Director of Airports, Letter submitted to the Board of Supervisors Mather Airport Master Plan Workshop #3, 8/20/03
4. "Planning Objectives: Preserve West Coast Air Cargo Hub Potential." Airport Staff briefing chart 20, Mather Airport Master Plan Working Group Meeting #3, 3/27/03
5. "The primary product of this study will be a Master Plan for Mather... Moreover, the preferred alternative will preserve space and identify facilities intended to support Air Cargo Hub operations..." Mather

RESOLUTION NO. 2007-28

**EL DORADO HILLS COMMUNITY SERVICES DISTRICT
RESOLUTION REQUESTING THE INCLUSION OF THE COMMUNITY OF EL DORADO
HILLS IN THE NEW ENVIRONMENTAL STUDY OF THE IMPACT OF THE MATHER
AIRPORT OPERATIONS ON THE COMMUNITY OF EL DORADO HILLS**

WHEREAS, the El Dorado Hills Community Services District is a full-service Special District duly established by the El Dorado County Board of Supervisor's Resolution 98-62. The District is responsible for providing parks, recreation programs, cable television, solid waste collection, CC&R enforcement services; and is charged with the overall enhancement of the quality of life of the residents of El Dorado Hills, and

WHEREAS, the Sacramento County intends to expand the Mather Airport Air Cargo Operations, located in Sacramento County, California, to a major Pacific Rim Regional Cargo Hub, and

WHEREAS, the expansion of the Mather Airport Air Cargo Operations will increase the number of low altitude aircraft flights over El Dorado County and neighboring communities, more specifically, the approximate 35,000 residents of the Community of El Dorado Hills, and

WHEREAS, it has been projected the number of low altitude aircraft flights will increase to approximately 50 cargo aircraft overflights a day, predominantly between the hours of 3:00 a.m. to 7:00 a.m. and 4:00 p.m. to 8:00 p.m.; resulting in approximately 15,000 aircraft overflights a year, and

WHEREAS, this number of aircraft overflights will result in increased obtrusive noise, light and unhealthy air pollutions and an increased probability of a major catastrophic aircraft crash, and

WHEREAS, this number of aircraft overflights will result in the socioeconomic decline of the individual citizen's residential and business property values, and

WHEREAS, these significant environmental impacts will result in the overall diminished individual and community sense of well-being, ultimately resulting in the decline of the overall quality-of-life of the residents of the Community of El Dorado Hills; and

WHEREAS, the Sacramento County Board of Supervisors is currently in the process of developing an Environmental Impact Report on the Mather Airport Master Plan to determine the Mather Airport Operation's environmental impacts and the necessary mitigation measures to minimize the identified environmental impacts, on the surrounding communities, and

NOW, THEREFORE, IT IS HEREBY RESOLVED that the Board of Directors of the El Dorado Hills Community Services District does hereby recognize the significance of the environmental impacts on the residents and businesses of El Dorado Hills by the Mather Airport Operations and, on their behalf, request that the El Dorado County Supervisors, Sacramento Airport System, and the Sacramento County Board of Supervisors act immediately to mitigate the significant environmental impacts of the Mather Airport Operations on the community of El Dorado Hills by including the community of El Dorado Hills and the neighboring communities in the required new Environmental Impact Report study.

PASSED AND ADOPTED, by the Board of Directors of El Dorado Hills Community Services District on the 8th day of November, 2007 by the following vote of the Board:

AYES: Brilliant, Masters, Rogozinski, Trapani, Vandegrift


NOES: -

ABSENT: -



Laurence S. Brilliant
President, Board of Directors

ATTEST:


Wayne A. Lowery, General Manager
Secretary to the Board of Directors

DEVELOPMENT SERVICES DEPARTMENT

County of
EL DORADO

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November 29, 2007

Joyce Horizumi, Environmental Coordinator
Department of Environmental Review and Assessment
Sacramento County
827 7th Street, Room 220
Sacramento, CA 95814

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

Dear Ms. Horizumi:

This letter is in response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the 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 El Dorado County.

El Dorado County is pleased to note that the DEIR intends to address the single-event noise impacts, as stated on Page 6 of the NOP. However, 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 El Dorado County 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.

El Dorado County looks forward to the release of the DEIR and to continue working cooperatively to resolve these concerns. If you have any questions, please contact me at (530) 621-5355 or pmaurer@co.el-dorado.ca.us.

Sincerely,

Peter N. Maurer
Principal Planner

Cc: El Dorado County Board of Supervisors
Laura Gill, Chief Administrative Officer
Greg Fuz, Development Services Director
Larry Appel, Deputy Director – Planning Services

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November 29, 2007

Via Overnight Delivery

Joyce Horizumi
Environmental Coordinator
Department of Environmental Review and Assessment
827 7th Street, Room 220
Sacramento, CA 95814

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

Dear Ms. Horizumi:

This firm represents the City of Folsom ("City" or "Folsom") on matters relating to the Draft Master Plan for Mather Airport ("Draft Master Plan"). We submit these comments in response to the County of Sacramento's Notice of Preparation ("NOP") of a Draft Environmental Impact Report ("DEIR") for the Draft Master Plan.

An overarching theme in the City's comments is the fact that the DEIR prepared for the Draft Master Plan must evaluate in full the significant environmental impacts (including increased noise, air pollution and traffic) that would result if the Sacramento Airport System ("SCAS") is permitted to transform Mather into a major cargo hub, consistent with its goals for the facility. The City of Folsom opposes SCAS's plans to dramatically expand cargo operations at Mather because of the current operation of the facility, flight patterns and the associated adverse impacts on the community and environment. Permanent modifications in flight patterns, flight track management, and

additional steps to eliminate flights over the City of Folsom are essential to avoid the adverse impacts to Folsom's residents and businesses. It is critically important that the decision-makers that will be asked to approve the Draft Master Plan fully understand the nature and scope of the associated impacts.

The City's comments fall into the following categories: (1) environmental/land use setting; (2) project description; (3) level of analysis; (4) potentially significant impacts; (5) mitigation measures; and (6) alternatives. The City also provides comments regarding the proposed use of old environmental reports and studies, and requests information regarding the process for review under the National Environmental Policy Act.

DISCUSSION

1. Environmental/Land Use Setting.

It is unclear, based on the NOP, how the Draft EIR will describe the environmental/land use setting for the Draft Master Plan. While the NOP notes the relationship between Mather and its neighbors, the focus of the description of the environmental setting appears to be within the airport's boundaries and the specific plan area. See NOP, p.4-5. The areas identified are insufficient to evaluate the impacts from Mather. Residents and businesses in Folsom and El Dorado County are adversely impacted in the present operation and the impacts will be greater with an expanded facility.

CEQA requires an EIR to provide a detailed description of the environmental setting of a proposed project. An adequate description of the setting must include "a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published . . . , from both a local and regional perspective." CEQA Guidelines § 15125(a) (emphasis added). The environmental setting forms the baseline against which the lead agency measures a proposed project's environmental impacts. *Id.*

Expanded operations at Mather Airport would affect a large area outside the airport's boundaries. The City of Folsom would be particularly affected by the airport's operations, given that a primary flight path goes directly over the City. The City also is significantly affected by airport operations because the City and Mather share a traffic corridor, Highway 50. Thus, the environment setting in the Draft EIR must include a

detailed and accurate description of the noise, traffic and other physical environmental condition of communities surrounding Mather, such as Folsom.

2. Project Description.

The NOP states that “[t]he purpose of the Mather Airport Master Plan . . . is to guide airport development over a 20-year period.” NOP, p.3. The County has recognized in the Draft Master Plan and in Capital Improvement Programs for the airport that there are numerous improvement projects proposed at Mather Airport, including a Category III Instrument Landing System (“Cat III ILS”) and extending Runway 4L-22R.

CEQA requires an EIR to evaluate the whole of a project so that “environmental considerations do not become submerged by chopping a large project into many little ones - each with minimal potential impact on the environment - which cumulatively may have disastrous consequences.” *Bozung v. Local Agency Formation Commission* (1975) 13 Cal.3d 263, 283-84. The EIR must include in its analysis the reasonably foreseeable future phases of a project. *Laurel Heights I*, 47 Cal.3d 376, 393-99. Where a lead agency plans to prepare an EIR for a project that involves policy decisions that will guide future development, the EIR must provide a description of the anticipated subsequent projects, including the kind, size, intensity and location of such projects. See Pub. Res. Code § 21156. In particular, the EIR must analyze the environmental impacts of on-site expansion plans. *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1357.

In order for the decision-makers and the public to evaluate the potentially significant environmental impacts of the Draft Master Plan, the Draft EIR must provide a clear and detailed description of all of the development projects that are proposed for Mather. In particular, the Draft EIR must include such information as (1) the component parts that make up a proposed improvement project and how those parts work together, (2) the function or use of a proposed improvement project as a whole, and (3) the rationale for why a particular improvement project is proposed at Mather Airport.

For example, Folsom recently filed a legal challenge to the County’s approval of a lease amendment that would permit substantial expansion of cargo-related facilities operated by DHL and Mather. The City’s legal challenge is based, in part, on the fact that this DHL expansion project is part of the proposed Mather Master Plan and must be evaluated as such. Accordingly, the Draft EIR for the Master Plan must include an

evaluation of the individual and cumulative impacts associated with the DHL expansion project.

Additionally, Folsom is concerned about the proposal in the Draft Master Plan to install a Cat III ILS at Mather. In particular, the City believes that the County proposes this technology in order to market Mather Airport as an air cargo hub. The County has recognized that a Cat III ILS is made up of numerous infrastructure components that operate together to provide enhanced navigational capabilities. In order to be legally adequate, the Draft EIR must identify all of the components of a Cat III ILS, both already existing and proposed for Mather, the function of a Cat III ILS at Mather, and why, in the County's view, this particular navigation technology is required. It is only after this information about the purpose and use of the project is made available that the decision-makers would be able to evaluate whether the Draft Master Plan, including a Cat III ILS, may cause significant noise, air quality, traffic, cumulative and growth-inducing impacts in the region.

Folsom is also concerned about SCAS's characterization of the proposed extension and upgrade of Runway 4L-22R as a "backup" runway. SCAS has taken the position that a runway extension is not required in order to increase capacity at Mather, but rather is proposed for the purpose of permitting air cargo carriers to operate in the event that Runway 4R-22L is not operational (e.g., if there is an accident on Runway 4R-22L, or SCAS is performing maintenance on that runway). Folsom does not have sufficient information at this time to evaluate SCAS's claim that an extension of the Runway 4L-22R is not necessary to increase capacity at Mather. However, based on available information, Folsom does not find SCAS's claim that Mather requires a longer runway solely for "back up" purposes to be credible. Many commercial airports (including airports with substantial cargo operations) operate with a single long runway. Maintenance operations in such cases can be scheduled to avoid operational conflicts. Regardless, the critical issues are:

- (1) whether the runway extension would allow SCAS to market Mather as an air cargo hub, and attract new cargo operators and operations to the airport; and
- (2) what, if any, legally enforceable mechanisms SCAS could and would use to ensure that Runway 4L-22R, if extended, would be used only when Runway 4R-22L is not operational.

As to the first issue, there is ample evidence that an extended second runway is critical to SCAS's ability to market Mather Airport to major cargo operators, regardless of whether the extension is required to increase cargo operations. It is reasonably foreseeable that if Runway 4L-22R is extended under the Draft Master Plan, cargo operations at the airport would increase. Thus, the Draft EIR must evaluate the environmental impacts of such increased cargo operations.

As to the second issue, to date, SCAS has not provided any explanation regarding how it would control use of an extended runway to only "backup" functions, and SCAS has not made any firm, enforceable commitment to limit the use of an extended Runway 4L-22R. Without any guarantee that the use of an extended runway actually could be limited over the long term to the extremely rare occasion when Runway 4R-22L is not operational, it is reasonably foreseeable that an extended runway would be used for substantially increased aircraft operations. Thus, the Draft EIR must evaluate the significant environmental impacts of regular use of an extended runway simultaneously with operations on Runway 4R-22L.

The NOP also explains that one of the objectives articulated by the project proponent is to "[r]ecommend facilities, phasing, and a financial plan that allows the Mather Airport to accommodate user needs under alternative roles." NOP, p.3. This objective's meaning is not clear and should be clarified. Does "alternative roles" refer to the airport or its users? What "alternative roles" does SCAS have in mind?

3. Level of Analysis.

The NOP suggests that the Draft EIR will evaluate the proposed near-term improvements at a project level, and the proposed long-term improvements at a program level. NOP, p.4. The NOP suggests that "[t]he long-term improvements planned by SCAS are not ripe for project specific analysis at this time." Id.

As a preliminary matter, the Draft EIR should provide an explanation of what "project level" analysis means for the proposed near-term improvements. In particular, the Draft EIR should expressly state whether it is the County's intention that the Draft EIR would provide sufficiently detailed analysis to allow the near-term improvements to go to construction without any further environmental review.

The City has serious concerns that the Draft EIR may not contain sufficiently detailed information and analysis regarding the proposed long-term projects

to determine the significant impacts of the Draft Master Plan project as a whole. The Master Plan is the plan for twenty years and all improvements or elements of the plan need to be clearly identified at this time so they can be evaluated as a whole.

Fundamentally, the purpose of an EIR is to provide decision-makers with the information necessary to make an informed decision on whether or not to approve the Project. See *Laurel Heights Improvement Ass'n v. Regents of the Univ. of Calif.* (1988) 47 Cal. 3d 376, 392 ("Laurel Heights I"); *Laurel Heights Improvement Ass'n v. Regents of the Univ. of Calif.* (1993) 6 Cal. 4th 1112, 1123 ("Laurel Heights II"). "CEQA requires a good faith effort at full disclosure A prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712. A lead agency's ultimate decision regarding project approval is a "nullity" if it is based upon an EIR that fails to provide decision-makers and the public with the information that CEQA requires. *Save Our Peninsula Comm. v. Monterey County Bd. of Supervisors* (2001) 87 Cal. App. 4th 99, 118 (quoting *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 721-22). An EIR is "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal. App. 3d 1022, 1027 (emphasis added). Moreover, CEQA prohibits an EIR from deferring impact analysis. See *Citizens of Goleta Valley*, 52 Cal. 3d at 568; *Endangered Habitats League v. County of Orange* (2005) 131 Cal. App. 4th 777, 793-796.

The Draft EIR should not make artificial distinctions between near-term and long-term projects in order to avoid detailed analysis of the long-term projects in the Draft EIR. CEQA requires the County to evaluate all of the potentially significant environmental impacts of the Draft Master Plan based on the reasonably available information about the project. CEQA provides that "[w]hile foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonable can." CEQA Guidelines § 15144.

The NOP's claim that the long-term projects "are not ripe for project specific analysis at this time," NOP, p.4, is not appropriate and will result in an insufficient environmental analysis. Presumably the County has sufficient information about many of the long-term projects in order to perform a reasoned analysis. For example, it appears that the County knows the size, type and location of all of the

long-term improvement projects described in the NOP. The County must disclose all that it reasonably can regarding all proposed modifications at Mather and evaluate the impacts that could result from those modifications.

4. Potentially Significant Impacts.

The NOP states that the "major environmental issues" identified for analysis in the Draft EIR are noise, wetland, air quality, and traffic impacts. NOP, p.5. The City agrees with all of these items, but finds the list incomplete. In particular, the Draft EIR should also discuss these major environmental issues: land use and planning, open space/biological resources, cumulative and growth-inducing impacts. The EIR must also analyze economic and social impacts associated with physical changes to the environment caused by the project.

A. Land Use Planning Impacts.

The Draft EIR should carefully evaluate the Draft Master Plan's consistency with regional and local land use plans. For example, it must consider whether and to what extent the proposed cargo operations at Mather would be consistent with residential and other development existing and planned for the area, including growth both within and outside Sacramento County. The Draft EIR must also assess consistency with the applicable Airport Land Use Compatibility Plan ("ALUCP").

B. Open Space/Biological Resource Impacts.

The NOP notes that approximately half of the land within Mather Airport (1,440 of 2,875 acres) is undeveloped open space. NOP, p.5. It is important that the Draft EIR consider carefully how the proposed Master Plan would impact this undeveloped area and the biological resources within it, as well as impacts outside the plan area.

C. Cumulative Impacts.

The Draft EIR should discuss the potentially significant cumulative environmental impacts of the Draft Master Plan. The CEQA Guidelines define cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." CEQA

Guidelines § 15355(a). “[I]ndividual effects may be changes resulting from a single project or a number of separate projects.” Id. “Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” Id. § 15355(b). A legally adequate cumulative impacts analysis views a particular project over time and must consider the impact of the project combined with other projects causing related impacts, including past, present, and probable future projects. Id. § 15130(b)(1). The cumulative impacts concept recognizes that “[t]he full environmental impact of a proposed . . . action cannot be gauged in a vacuum.” *Whitman v. Board of Supervisors* (1979) 88 Cal. App. 3d 397, 408.

The Draft EIR for the Mather Master Plan must include other nearby development in its cumulative impacts analysis. Substantial projects that are proposed/underway near Mather include: the Easton project, Folsom’s Annexation project, developments in Rancho Cordova (e.g. Sunridge, Rio del Oro, Suncreek) and aggregate mining projects south of Highway 50 (e.g., Granite, DeSilva, Teithert). The Draft EIR should consider the cumulative impacts, including traffic congestion and air quality impacts, that could result from the combination of Mather expansion and such nearby projects. Additionally, the environmental review document should evaluate how expanded operations at Mather would impact the residents and businesses in newly-developed areas.

D. Growth-Inducing Impacts.

One of the stated objectives of the project proponents is to respond to “community desires for economic generation.” NOP, p.3. If SCAS succeeds in its goal of transforming Mather into a major cargo hub, that transformation would inevitably induce other growth and development in the airport vicinity. The Draft EIR must account for and evaluate the impacts associated with such induced growth.

E. Noise

Noise is properly identified in the NOP as being an area of particular concern. In evaluating noise, it is particularly important that the Draft EIR present a rigorous single event noise analysis that is meaningful and comprehensible to impacted members of the community. In particular, residences and businesses in Folsom endure sleep disturbance and interrupted conversations/activities. It is critically important that the Draft EIR present a single event noise analysis that evaluates and conveys the frequency with which such impacts would occur under the Master Plan, when they would

occur and how severe they would be. Because different aircraft types and configurations produce different single event noise impacts, it is also important for the Draft EIR to analyze single event noise impacts on an aircraft-specific basis, evaluate a complete range of flight times because ambient noise levels vary during the day and night. It is critically important that decision-makers and members of the public have the information necessary to understand how increased flights at Mather, during different times of the day and night, would impact residences and businesses. As further articulated in the mitigation section, below, the Draft EIR needs to evaluate flight paths and approaches and the effect on Folsom and neighboring jurisdictions, including western El Dorado County.

The field of aviation noise analysis is developing rapidly. It is incumbent on the County to prepare a noise analysis that takes advantage of recent developments and increased understanding in this technical field.

F. Climate Change

The NOP notes that the Draft EIR will address climate change (NOP, p.6) in accordance with recommendations from the SMAQMD. The EIR should address all aspects of this significant project and its potential impact related to climate change. Interim and long term measures should be identified to meet current and anticipated greenhouse gas reduction demands.

5. Mitigation Measures.

Folsom anticipates that the Draft EIR analysis will show that the Draft Master Plan will result in numerous significant environmental impacts, particularly noise, air quality, traffic, and the other impact areas identified above. CEQA requires lead agencies to adopt feasible mitigation measures, and/or a feasible environmentally-superior alternative, in order to substantially lessen or avoid otherwise such significant impacts. See Pub. Res. Code § 21102, 21081(a); CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15091(a)(1).

As Folsom has consistently explained over the last several years, the noise impacts of cargo operations at Mather Airport are extremely detrimental to Folsom's residents and businesses. There are options available to the County, however, to help it to reduce noise impacts in communities such as Folsom. For example, in an SCAS staff report to the Board of Supervisors, SCAS recognized that:

[a]s a means of mitigating potential adverse effects, an airport operator may impose runway use programs (or policies) and/or flight track management measures. Such policies may be implemented to (1) regulate the direction and frequency of aircraft operations; and/or (2) restrict the use of facilities to particular types of aircraft [T]he intent of runway use and flight track management policies at Mather would be to reduce aircraft noise exposure and minimize overflights of non-compatible land uses in the immediate vicinity of the airport . . .

SCAS Staff Report, p.5 (December 9, 2003). Thus, tools such as flight track management are feasible mitigation measures that must be described and analyzed in detail in the Draft EIR. The Draft EIR must provide detailed discussion of such a mitigation measure, so that decision-makers and the public can evaluate the proposed measures' effectiveness at reducing significant environmental impacts. See Stanislaus Natural Heritage Project v. County of Stanislaus (1996) 48 Cal. App. 4th 182, 195; Kings County Farm Bureau, 221 Cal. App. 3d at 727; San Franciscans for Reasonable Growth v. City & County of San Francisco (1984) 151 Cal. App. 3d 61, 79.

As Folsom has previously made clear, planes arriving into Mather can and should generally be routed over the Highway 50 corridor in order to avoid sensitive residential receptors. The Draft EIR must include such a flight track change as a mitigation measure for the proposed increase in operations.

The County should undertake appropriate efforts to control airport noise pursuant to the FAA programs commonly referred to as "Part 150 " and "Part 161." These programs can be used by local airport operators such as SCAS to address airport impacts through in-flight regulations and strategies to control the flow of traffic (e.g., curfews, noise budget programs and airport use charges).

The County has properly recognized that the Draft Master Plan stage is the appropriate time to develop these important mitigation measures. For example, SCAS staff explained to the Board of Supervisors that measures such as runway use programs/policies and flight track management "are most effective when developed during the project definition stage, rather than implemented retroactively." SCAS Staff Report, Attachment 3, p.3 (October 11, 2005). The County has not approved a Master Plan for Mather Airport; now would be the "most effective" time for the County to develop, and commit to implementing, noise mitigation measures.

SCAS should immediately begin evaluating possible flight track changes and other similar operational improvements that would address existing and future noise impacts endured by neighboring communities. The Draft EIR should similarly identify feasible and enforceable noise mitigation measure to address Folsom's concerns.

If cargo aircraft operations increase at Mather as proposed, cargo truck and other vehicle trips and will also increase substantially. The Draft EIR must include appropriate mitigation measures to address the regional transportation/traffic, air quality and other impacts associated with such increased trips. For example, the Draft EIR should establish a mechanism for SCAS and Mather operators to contribute their fair share to regional transportation and congestion management projects (e.g., the Elk Grove-El Dorado Connector). The Draft EIR should also develop strategies to reduce vehicle miles traveled by people working at Mather (e.g., public transit enhancements, shuttles).

Similarly, the Draft EIR should include appropriate mitigation measures for the substantial air pollution impacts that would be contributed by increased aviation activities at Mather. For example, all ground service equipment should be electric or clean-fuel vehicles. Aircraft should be prohibited from operating auxiliary power units ("APUs") while on the ground – SCAS should be required to provide electricity and pre-conditioned air for aircraft on the ground.

6. Alternatives.

The NOP states that "[t]he EIR will evaluate potential impacts of the Master Plan alternatives" NOP, p.5. The NOP does not explain, however, what proposed alternatives will be included in the Draft EIR. Based on the lack of identified alternatives, Folsom is concerned that the Draft EIR will improperly evaluate only the preferred alternative (or "proposed action") and the no project alternative. The EIR must evaluate other feasible alternatives to the proposed project and its various elements.

A core requirement of CEQA is that an EIR must discuss alternatives to the proposed project capable of avoiding or substantially lessening the adverse environmental effects of a project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." CEQA Guidelines § 15126.6(b). The alternatives to be discussed need not be identical to, or even substantially similar to the proposed project, so long as they can be accomplished within a reasonable period of time, taking into account economic, environmental, social and technological factors. *Citizens of Goleta Valley*, 52 Cal.3d at 553, 574.

The County is obligated to develop good-faith alternatives to the Draft Master Plan near-term proposed action and long-term proposed action that would result in fewer significant environmental impacts. It would be wholly inadequate under CEQA for the County to conclude that through the process of developing the Draft Master Plan, the County determined that there are no feasible alternatives to the proposed project that would avoid or reduce the environmental impacts of the project. It is critically important that the Draft EIR evaluate a reasonable range of feasible alternatives, including a scaled-back land-side alternative, an alternative that does not modify the airfield (i.e., no Cat III ILS and no runway extension), and an alternative that focuses on a different location for cargo expansion (e.g., Sacramento International Airport).

7. Proposed Reliance on Old Environmental Documents.

The NOP states that “[t]he environmental analysis for the Master Plan will be completed through the preparation of technical studies as well as a synthesis of existing reports and studies on the environmental conditions at Mather airport and the surrounding area.” NOP, p.5. It also states that “[t]he majority of the data for the remaining environmental resources has been collected in previous studies, and the EIR will be based on this information” Id. at p.7.

Based on the vague reference in the NOP to “existing reports and studies,” the City is unaware of the precise documents that the County proposes to rely on. The City is concerned, however, that rather than preparing full and complete analysis of the Draft Master Plan, the Draft EIR will attempt to short-cut the process by referencing old environmental reports and other documents. The County cannot rely on out-of-date environmental reports prepared for Mather Airport that were based on facts and assumptions that are no longer applicable to the airport or the community.

For example, the environmental documentation prepared for the Mather Airfield Reuse Plan was completed more than a decade ago. The relevant environmental and operational conditions have changed substantially over the last 10 years. For example, the region and particularly Folsom and western El Dorado County have experienced explosive residential and commercial growth. These new land use patterns, which are particularly sensitive to airport operations, were not accounted for in the old environmental review document. In addition, assumptions about the airport and its operations, now and in the future, have changed. Although the NOP notes that the prior studies will be investigated to ensure they are current and valid, it seems very likely that

Joyce Horizumi
November 29, 2007
Page 13

the County will need to conclude that such old studies and reports are no longer helpful, and new studies will be required.

8. NEPA Review.

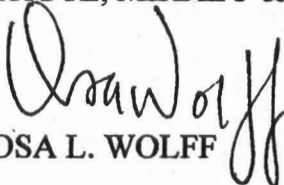
Folsom understands that the Federal Aviation Administration has determined that an Environmental Assessment under the National Environmental Policy Act ("NEPA") should be prepared for the Draft Master Plan. The City requests more information regarding the timing and scope of such review. The NOP provides no useful information regarding how the County's CEQA process will relate to the federal NEPA process.

CONCLUSION

Thank you for the opportunity to comment on the NOP for the Draft Master Plan. The City of Folsom looks forward to continued cooperation with the County in the preparation and review of the Draft EIR for the project.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP


OSA L. WOLFF

cc: John Whisenhunt, Office of the Sacramento County Counsel
Diane McElhern, Office of the Sacramento County Counsel
Terry Schutten, Sacramento County Executive
G. Hardy Acree, Director of Airports, SCAS
Kerry L. Miller, City Manager, City of Folsom

11-8-07



Tara McCann
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11/07/2007 10:44 AM

To "James Sweeney" <bosthree@co.el-dorado.ca.us>, "N. Santiago" <bosfive@co.el-dorado.ca.us>, "Ron Briggs" <bosfour@co.el-dorado.ca.us>, "Rusty Dupray"

cc

bcc

Subject Comments to DERA

Comments to DERA on the Mather NOP:

This project as the Sacramento Board of Supervisors and the Department of Airports knows will have significant and detrimental effect to the Western Slope of El Dorado County and specifically to El Dorado Hills and the City of Folsom. For Mather Air Cargo International Hub Expansion to go forward and have the primary landing approaches over El Dorado Hills with as many flights planned will destroy the area and quality of life as we know it.

The Noise alone with large Air Cargo landings at night and early morning hours is an extremely large and a consequential impact to our area. Also of significant concern that warrant mitigation is the Air Pollution generated by the Pollutants that are left in the trail of the landing jets and concentrate locally in the atmosphere. There are many studies on the Internet, you don't have to go far to see how significant this jet air pollution is and how it can affect people especially children and the elderly with asthma and respiratory problems. The impacts that DERA needs to address and that the County needs to mitigate are :

1. Noise
2. Measurable Pollution and Toxins from Jet streams
3. Safety
4. Socioeconomic fallout from loss of business and incoming residents to El Dorado Hills for noise generated from a project outside of the County.
5. How Sacramento County Department of Airports plans to minimize or eliminate these impacts.

The California Environmental Quality Act (CEQA) defines procedures for environmental review and impact analysis of projects that need approval by local or state agencies. The National Environmental Policy Act (NEPA) does the same for projects that need approval by federal agencies. Both laws require that the potential environmental impacts of a proposed project be assessed, quantified, disclosed, minimized, and eliminated whenever possible.

The goals of NEPA are to declare a national policy that will encourage productive and enjoyable harmony between humans and their environment. To promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate human health and welfare. To enrich the understanding of the ecological systems and natural resources important to the nation and to establish a Council on Environmental Quality. The Objectives of NEPA include Supplemental legal authority, Procedural reform, Disclosure of environmental information, Resolution of environmental problems, Fostering intergovernmental coordination and cooperation and Enhancing public participation in government planning and decision making.

El Dorado County is one of the local agencies that will suffer major impacts to it's communities on the Western Slope, namely El Dorado Hills, as a result of this project if it were to go forward as planned. The El

Dorado County Board of Supervisors has responded as well as the Joint Powers Authority and the City of Folsom identifying significant impacts that the Project Proponent has the responsibility to Mitigate. Noise and Air Traffic at the levels that Sacramento County Department of Airports is suggesting and proposing to make a reality is not acceptable to dump over the community of El Dorado Hills.

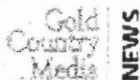
Back in 1997 Sacramento County rerouted flights that had historically gone out over South Sacramento to redirect and fly out over El Dorado County. A Board of Supervisor was quoted in the Sacramento Bee that they did a study to where these reroutings would be of least impact and gathered input from community meetings in Sacramento County. Coincidentally they did not hold any of these public input meetings in El Dorado County. I had to request that they include our input.

Sacramento County Department of Airports is still downplaying the immense impact this will have in the future to our area. DERA is the formal channel to quantify and identify these impacts. The people of El Dorado Hills and other effected areas are going to be closely monitoring the legal responsibility of DERA in this process. Noise modeling is fine to use in the initial planning study phases but in the EIR phase actual "independent analysis" of real time single event noise monitoring should be included and for different weather conditions such as clear weather verses low cloud cover. The low cloud cover has a significant effect on increasing the noise and resonating the sound to amplify acoustic levels. Not only does it dramatically increase the noise DB levels it also increases the audible duration.

I request that DERA publish all comments and make available for public viewing on the DERA website.

Tara Mccann
El Dorado Hills Resident

Tara Mccann-Mook, P.E.
Caltrans Encroachment Permits
District 3 - RTMC
3165 Gold Valley Drive
Rancho Cordova, Ca. 95742-6588
(530) 755-7371



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Still of the night could get noisy

Tuesday, November 20, 2007

Want to be heard?

That may become more difficult if the Sacramento County Board of Supervisors get their wish and have the skies filled with jumbo cargo jets.

As a former Air Traffic Control Supervisor I like airplanes a lot, but love my quiet even more.

Background: Sacramento County plans to expand Mather Airport into a major air cargo hub. When complete, the impact will mean extensive night and day flights over our communities. The jumbo cargo jet's main approach path extends from Georgetown, over Coloma, Cameron Park, El Dorado Hills, Folsom and on to Mather airport.

Keep in mind, when expansion is completed, the aircraft operations, would be 24/7.

Air cargo relies on nighttime operations to be profitable, typically with two rushes between 9 p.m. and 6 a.m. During busiest transport times (lasting one or more hours) expect an aircraft overhead about every minute or less. Sounds crazy? Check Fed Ex's cargo hub in Memphis.

Status: Sac County took public comments through Nov. 7 as to the scope of the Environmental Impact Review.

In October I attended the public "scoping" meeting conducted by Sac County's Dept of Environmental Review and Assessment).


The DERA has conducted noise sampling around the Mather Field area and adjacent

(1 mile or so). Currently DERA has NO PLANS to include noise sampling along the instrument approach over Folsom or El Dorado County.

Simply put, we must demand the EIR include the impact of noise from low-flying jumbo jets by sampling the approaches over El Dorado County and Folsom. If we do nothing, only the area adjacent to Mather field will be sampled for noise.


There are alternative air traffic approaches to Mather that must be considered in the

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study and included in the recommendations.

Please submit your letters/comments to the DERA no later than Nov. 30 2007.

Include your name and contact information and send comments to: Joyce Horizumi, Director Environmental Coordinator, Sac County DERA, Department of Environmental Review and Assessment, 827 7th Street, Room 220, Sacramento, Ca 95814 or e-mail to: DERA@saccounty.net **Michael Betts**

El Dorado Hills

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Study sees China as huge boost to Mather

Airport goal: Increase cargo 36%

MARK LARSON / STAFF WRITER

The fast-growing China market could become a huge new source of growth for international air cargo business at Mather Airport, fueling its efforts to increase cargo traffic by 36 percent, a consultant says in a recent study conducted for the Sacramento County Airport System.

Air freight to and from Asia, especially China, could combine with domestic growth through Mather to expand the airport system's share of air cargo from the present 256 million pounds, about 8.8 percent of the Northern California total, to its goal of 12 percent, according to the study by airport consultant Fred Davis of Huntington Beach.

That push would sit well with airport planners, who have marked Mather as the cargo hub for the region and want to expand use of the former military base.

But it has already provoked anger among a vocal group of Mather neighbors who decry the noise and late-night traffic from the present cargo operation at the airport, let alone an expansion.

Chinese make queries on airport biz park: Airport system chief G. Hardy Acree has said he eventually plans a trip by his staff to visit Macau, a hotbed of trade in China where international air-cargo operations are beginning to boom.

Page 1 This week, Acree said he has no money for the trip yet, but the system is gearing up marketing efforts to reach U.S. and Asian air carriers that serve China. International cargo inspections at Mather, he added, could be arranged out of the U.S. Customs office at Sacramento International Airport.

Little-known: Davis calls Mather "an ideal international cargo airport." For now, United Parcel Service, DHL and See **MATHER**, Page 38

“Our vision for Mather is it will be THE air cargo facility, a hub not just for this part of California, but for the Pacific Rim.”

Paul Hahn, County Economic Development Director

Folsom sues to halt air cargo expansion at Mather

By David Richie
and Cathy Locke
drichie@sacbee.com

Folsom officials filed a lawsuit Wednesday to force Sacramento County to reverse an agreement that expands DHL Express cargo operations at Mather Airport. The lawsuit requests a tempo-

rarily restraining order to halt the county's implementation of its new lease amendment with Midwest Development Co. and its sub-tenant, DHL Express, said Kerry Miller, Folsom city manager, in a telephone interview Wednesday afternoon. The Board of Supervisors on

Order sought to reverse county pact with DHL Express; noise is key concern.

Oct. 23 approved that agreement on a 4-1 vote, with Supervisor Roberta MacClashan dissenting. Miller called the county's approval of the lease amendment "non-compliant with the required environmental review process." County environmental offi-

cials have not finished a report assessing the environmental impacts of a proposed Mather Airport master plan. The board's approval also came just a few days after a county environmental assessment official took heat from resi-

► MATHER, Page B3

LINE TODAY

TAKE TAKE

EDITORIAL

Mather: Residents clash with county

► FROM PAGE B1
 dents about Mather cargo jet operations. That confrontation occurred during an Oct. 18 community meeting in Folsom. County officials appealed for patience and promised the angry residents that the master plan environmental impact assessment will not be a sham.

The draft master plan envisions possibly dramatic increases in Mather Airport cargo operations — much to the dismay of officials and residents in Folsom, El Dorado Hills and other areas affected by jet cargo plane “overflights.”

Miller said that for many residents, those overflights are already too low, too loud and too frequent, especially between midnight and 6 a.m.

The recently approved lease amendment would expand the DHL Mather facility by more than 35,000 square feet of paved area. It would include expanded parking for employees and for big-rig trucks and new storage areas for ground support equipment, according to the city’s evaluation.

City officials are perturbed because all those DHL improvements are discussed in the draft

master plan now supposedly being evaluated.

“It’s almost uncanny,” Miller said. “It feels like a piecemeal approach to implementation of the master plan.”

Folsom’s lawsuit was filed against the Sacramento County Airport System, Sacramento County and the Board of Supervisors.

Karen Doron, a spokeswoman for the airport system, said officials were too busy dealing with the holiday travel crunch to comment on the city’s legal action.

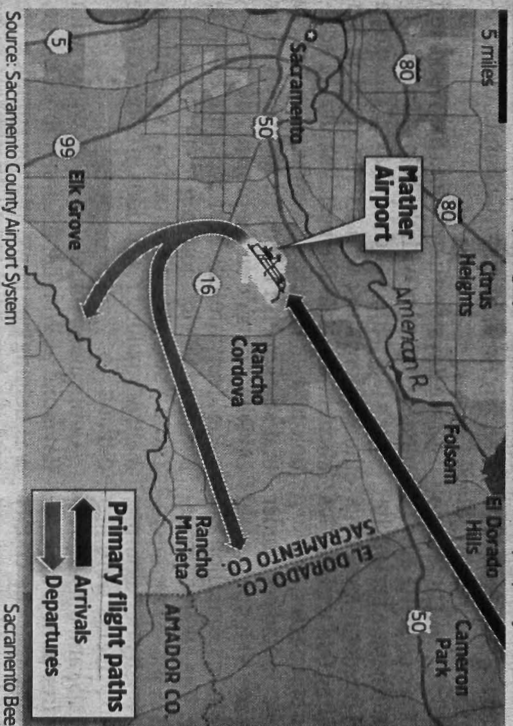
Doron referred a reporter to an attorney in the County Counsel’s Office who did not answer two calls for comment Wednesday afternoon.

On Nov. 8, the board of directors of the El Dorado Hills Community Services District adopted a resolution urging Sacramento County to include El Dorado Hills and the surrounding area in the environmental review for the proposed Mather master plan.

That resolution states that expanded Mather cargo operations could result in up to 50 low-altitude cargo flights a day, “predominantly between the hours of 3 a.m. to 7 a.m., and 4 p.m. to 8

Fight noise

The city of Folsom is seeking a temporary court order to force Sacramento County to reverse a decision it made on Oct. 23 that would expand DHL cargo operations at Mather Airport. Residents of nearby communities say they fear the noise from cargo jets will cause a decline in property values.



Source: Sacramento County Airport System

Sacramento Bee

p.m.”

Potential impacts cited by El Dorado Hills officials include “increased obtrusive noise, light and unhealthy air pollutants and an increased probability of a major catastrophic aircraft crash” resulting in “the socioeconomic decline of the individual citizen’s residential and business property values.”

Larry Brilliant, CSD board president, said the resolution was adopted after he attended the Oct. 18 community meeting in Folsom and learned that El Do-

rado County was not included in the draft master plan’s environmental impact analysis.

County officials have not responded to the CSD’s concerns.

Folsom’s role in dealing with the cargo jet noise issue is one of the keys to a solution.

“I am glad to see the city of Folsom stepping up to the plate,” Brilliant said. “They have the influence to really make things happen.”

Call The Bee’s David Richie, (916) 608-7455.

Mather: Residents clash with county

► FROM PAGE B1

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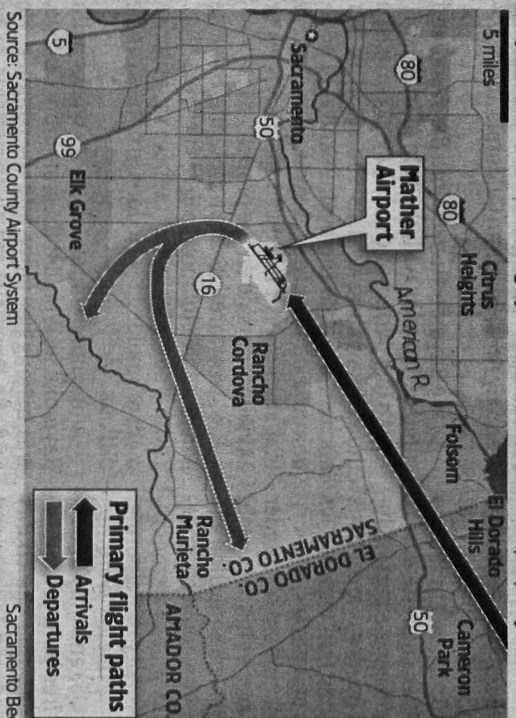
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