



Cindy Johnson <cynthia.johnson@edcgov.us>

## Fwd: Response To Notice of preparation of a Draft Environmental Impact Report For Revised Mather Airport Master Plan; Control Number 2002-0325

1 message

The BOSFOUR <bosfour@edcgov.us>

Tue, Jul 23, 2013 at 9:39 AM

To: EDC COB <edc.cob@edcgov.us>, Cindy Johnson <cynthia.johnson@edcgov.us>

Item #6

----- Forwarded message -----

From: Larry Brilliant <lsb1048@sbcglobal.net>

Date: Mon, Jul 22, 2013 at 9:49 PM

Subject: Response To Notice of preparation of a Draft Environmental Impact Report For Revised Mather Airport Master Plan; Control Number 2002-0325

To: DERA@saccounty.net, SupervisorSerna@saccounty.net, jyee@saccounty.net, susanpeters@saccounty.net, macglashanr@saccounty.net, nottolid@saccounty.net

Cc: Peter Maurer <Peter.Maurer@edcgov.us>, bosone@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us

Dear Ms. C. Hack, attached is our response letter dated July 22, 2013, with attachments, to the NOP of a Draft Environmental Impact Report dated July 1, 2013, Control Number: 2002-0325, Project Title: Mather Airport Master Plan.

Please Note that the City of Folsom letter dated October 4, 2012 is also an attachment to our letter. However, due to the size of the document I did not send with this e-mail. You should have this document in your files. The document will be included in our hardcopy sent US Mail.

Should anyone have any questions or need additional information please do not hesitate to contact me.

Larry Brilliant, Chair

The Mather Airport Master Plan Draft Environmental Impact Review Committee

3075 Latham Lane

El Dordo Hills, CA 95762

916.803.6270

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Thank you.

### 4 attachments

Letter to Sacramento County DEIR 7 22 2013 FINAL.pdf  
300K

Letter to Sacramento County DEIR 9.30, 2012.pdf  
201K

MatherAirportMasterPlanDraftEIRCombined Documents Final.pdf

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7/23/13 Edcgov.us Mail - Fwd: Response To Notice of preparation of a Draft Environmental Impact Report For Revised Mather Airport Master Plan; Control Number...

 **matherairportmasterplanandenvironmental documents final.pdf**  
505K

 **EDC Comment Letter - Mather 9-18-122.pdf**  
203K

July 22, 2013

Sent U.S. Mail and E-Mail

Ms. Catherine Hack, Environmental Coordinator

Department of Community Development

Planning and Environmental Review Division

827 7<sup>th</sup> Street, Room 220

Sacramento, CA 95814

Re: Comments to the Notice of Preparation of a Draft Environmental Impact Report For  
Revised Mather Airport Master Plan - Control Number: 2002-0325

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Dear Ms. Hack:

The Mather Airport Master Plan Draft Environmental Impact Report Review Committee, herein known as THE COMMITTEE, has reviewed the Notice of Preparation of a Draft Environmental Impact Report for Revised Mather Airport Master Plan dated July 1, 2013.

THE COMMITTEE is made up of residences of El Dorado County who have personally been impacted by the Mather Airport Air Cargo Operations at Mather Airport, Sacramento, California. Many of the members have been intimately involved with the Mather Airport Master Plan for 16 plus years. Additionally, many have served on committees such as the Communities for a Responsible Mather Airport and the Mather Airport Aircraft Overflight Noise Group. Further, some of the members have extensive professional expertise responding to draft environmental impact reports.

THE COMMITTEE has serious concerns regarding the conclusions reached regarding the environmental impacts the Mather Airport Air Cargo Operations at Mather Airport will have on the residences of the County of El Dorado and more specifically the communities of El Dorado Hills, Cameron Park, Rescue and Shingle Springs.

**THE COMMITTEE'S CONCLUSION:** The Mather Airport Draft Environmental Impact Report failed to show substantial evidence to address the serious impacts of the Mather Airport operations on the surrounding communities for the conclusions reached. This 2<sup>nd</sup> Notice of Preparation, NOP, sent out July 1, 2013, is seriously flawed and the project proponent should not



## Notice of Preparation Mather Airport

July 22, 2013

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move forward with a Draft EIR until an NOP is developed that addresses the significant impacts to areas that were excluded in the original Draft EIR with the statement “they are outside the study area”. Before any Draft EIR is conducted the project proponent should identify the “Project Study Area” and define the studies to be represented in the Draft EIR. The outpouring of public comments Sacramento Department of Airports received summarized the huge flaw in this project document that failed to study or even acknowledge the significant impacts outside an approximate three mile radius of the airport. The 2<sup>nd</sup> NOP needs to address the specific comments that were supplied in our attached letter dated September 30, 2012, outlining our thirty-five page analysis of the Mather Airport Master Plan Draft Environmental Impact Report and show that the new project DEIR is including the areas that were omitted by mere geography that they lie outside a predetermined sphere of influence of a very small three mile radius around the airport. The new DEIR must address mitigations to eliminate the impacts of the Mather Airport cargo operation on the surrounding communities outside the three mile radius. Specifically the residences of the communities of El Dorado Hills, Cameron Park, Rescue and Shingle Springs.

### **Response to the Notice of Preparation of a Draft Environmental Impact Report For Revised Mather Airport Master Plan date July 1, 2013**

1. **Background Paragraph** - The NOP gives one paragraph statement on the direction Sacramento County Department of Airports was given to redo the Draft EIR. This one paragraph is extremely oversimplifying the hundreds of pages of comments that Sacramento County DERA received. The 2<sup>nd</sup> NOP states:  
“Comments were received concerning the validity of the airport activity forecast baseline year (2007) relative to industry and airport activity trends that have occurred since the DEIR was initiated. Consideration of these concerns led to the determination that a new airport activity forecast, with a baseline year of 2012 and a planning horizon year of 2035 should be prepared and the Mather Airport Master Plan project description should be revised to accurately reflect current and anticipated air cargo and general aviation industry business conditions.”

**In Conclusion:** The project cannot solely rely on base year and projected year modeling. The huge overwhelming response to the County was event specific noise needed to be included in the DEIR and that the areas of noise impact in El Dorado County needed to be included in the project study area.

2. **Planning Activity Level 1 & Level 2 Paragraph:** The NOP states:

*Planning Stage 1 - Upgrade Instrument Landing System on Runway 22L to Category IIIb*  
*Planning Stage 2 - Extend Runway 4L/22R 1160 feet*



## Notice of Preparation Mather Airport

July 22, 2013

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The NOP has no mention of the inclusion of Runway 4L/22R after extension to instrument landing. But this has been stated prior by Sacramento County Department of Airports to have both runways on instrument landing. How is the project document Draft EIR presenting and analyzing this scenario? This Phase 2 lengthening of runway and adding instrument landing would potentially increase capacity dramatically how is this being analyzed and for future allowable capacity. The County's own documents state that this redundant runway would be used solely for "emergencies". It was commented back by many that this is hard to believe that the money and expense to lengthen a runway 1160 feet, add instrument landing equipment and maintain it would be justified by an "emergency" only use. This needs to be included in the Draft EIR for the project on how this extended runway 4L/22R is proposed to be used and at what capacity and frequency. This would give the capacity to land jets at Mather Airport side by side within minutes apart. Additionally, if 4R-22R is to be used then the DEIR must propose enforceable mitigation measures that would prevent the extended runway 4R-22R from operating simultaneously with runway 4R-22L.

**Conclusion:** The NOP needs to define a better and more thorough project scope for every significant aspect of the project. Lengthening runway 4L/22R and adding instrument landing is significant scope of the project. Additionally, if 4R-22R is to be used then the DEIR must propose enforceable mitigation measures that would prevent the extended runway 4R-22R from operating simultaneously with runway 4R-22L. Further, the newly revised DEIR should not "piecemealed" the project to avoid analyzing impacts and mitigations at full built out and use.

3. **Project Goals and Objectives Paragraph:** - The NOP must include a project Goal to adequately identify a Project Study Boundary based on the comments and exclusions in the previous project Draft EIR. The outpouring from communities, cities and counties of how outrageous an airport project Draft EIR was that only stated they would study a three mile radius around the airport was a huge fatal flaw of the document. Number one of the Project Goals needs to establish the appropriate Project Study Area and identify what studies will be done in the expanded study area. Solely using modeling is inadequate to represent the full effects of noise and air traffic over the impacted areas of El Dorado County specifically the communities of El Dorado Hills, Cameron Park, Single Springs, Rescue, and the City of Folsom as well as many communities significantly affected outside the three mile radius from the airport.

**In Conclusion:** Modeling is only one tool and should not be the sole source of noise study and presentation of noise data. The comments to the Draft EIR have overwhelmingly stated this see comments from El Dorado County dated Sept. 18, 2012 to the Draft EIR. This is a serious flaw in the NOP that needs to be addressed.





## Notice of Preparation Mather Airport

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- 4. Probable Environmental Effects Paragraph:** - The NOP must address the Project Study Boundary. It is severely limiting of approximate three mile radius around the airport this is sorely inadequate as has been extensively documented in the project comments and responses since 1995 - 1996 to present. A paper trail of documentation, noise test data, video and testimony shows surrounding Cities and Counties have spent years and thousands of interactions with Sacramento County showing how flawed Sacramento County Department of Airports Project was in not including the areas of significant impact in the Draft EIR. The NOP must expand the Project Study Boundary to include residences of El Dorado County specifically the communities of El Dorado Hills, Cameron Park, Shingle Springs, Rescue and the City of Folsom as well as many communities significantly affected outside the three mile radius from the airport.
- In Conclusion:** It must be a priority of the NOP to first identify the Project Study Boundary and the scope of studies within that Project Study Boundary before the County moves ahead with the new Draft Environmental Impact Report.

It is the overall position of THE COMMITTEE that the Notice of Preparation dated July 1, 2013, does not address the serious flaws in the Mather Airport Master Plan Draft Environmental Impact Report and does not include many areas that will be significantly impacted in the Project Study Area identified in following documents:

1. THE COMMITTEE'S letter and analyst of the Mather Airport Master Plan Draft Environmental Impact Report dated September 30, 2012 (See attached)
2. The El Dorado County letter and analyst of the Mather Airport Master Plan Draft Environmental Impact Report dated Sept.18, 2012 (See attached)
3. The City of Folsom letter and analyst of the Mather Airport Master Plan Draft Environmental Impact Report dated October 4, 2012. (See attached)

Should anyone have any questions or need additional information please contact Tara McCann at 530.755.7371 or me at 916.803.6270.

For The Mather Airport Master Plan Draft Environmental Impact Review Committee

*Larry Brilliant*

Larry Brilliant, Chair

3075 Latham Lane

El Dorado Hills, CA 95762



Notice of Preparation Mather Airport

July 22, 2013

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Attachments:

THE COMMITTEE'S letter and analyst of the Mather Airport Master Plan Draft Environmental Impact Report dated September 30, 2012

The El Dorado County letter and analyst of the Mather Airport Master Plan Draft Environmental Impact Report dated Sept.18, 2012

The City of Folsom letter and analyst of the Mather Airport Master Plan Draft Environmental Impact Report dated October 4, 2012.

cc:

Sacramento County Board of Supervisors

District 1

Phil Serna                      SupervisorSerna@saccounty.net      916.874.5485

District 2

Jimmie R. Yee                      jyee@saccounty.net                      916.874.5481

District 3

Susan Peters                      susanpeters@saccounty.net              916.874.5471

District 4

Roberta MacGlashan              macglashanr@saccounty.net              916.874.5491

District 5

Don Nottoli                      nottolid@saccounty.net                      916.874.5465



Notice of Preparation Mather Airport

July 22, 2013

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El Dorado County Board of Supervisors

District 1

Ron Mikulaco	<a href="mailto:bosone@edcgov.us">bosone@edcgov.us</a>	916.358.3555 Ext. 5650
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District 2

Ray Nutting	<a href="mailto:bostwo@edcgov.us">bostwo@edcgov.us</a>	916.358.3555 Ext. 0000
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District 3

Brian K. Verrkamp	<a href="mailto:bosthree@edcgov.us">bosthree@edcgov.us</a>	916.358.3555 Ext. 5652
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District 4

Ron Briggs	<a href="mailto:bosfour@edcgov.us">bosfour@edcgov.us</a>	916.358.3555 Ext. 6513
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District 5

Norma Santiago	<a href="mailto:bosfive@edcgov.us">bosfive@edcgov.us</a>	916.358.3555 Ext 6577
----------------	--	-----------------------

El Dorado County Principal Planner, Long Range Planning

Peter Maure	<a href="mailto:peter.maurer@edcgov.us">peter.maurer@edcgov.us</a>	530.621.5331
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September 30, 2012

Sent U.S. Mail and E-Mail

Ms. Marianne Biner, DERA Analyst

Sacramento County Environmental Review and Assessment

827 7<sup>th</sup> Street, Room 220

Sacramento, California 95814

Re: Comments on the Draft Environmental Impact Report

Mather Airport Master Plan - Control Number: 2002-0325

State Clearinghouse Number: 2007102040

Dear Ms. Biner:

The Mather Airport Master Plan Draft Environmental Impact Report Review Committee (A Sub-Committee of the El Dorado Hills Area Planning Advisory Committee) has reviewed the Mather Airport Master Plan Draft Environmental Impact Report. This sub-committee is made up of residences of El Dorado County who have personally been impacted by the Mather Airport Air Cargo Operations at Mather Airport, Sacramento, California. Many of the members have been intimately involved with the Mather Airport Master Plan for 15 plus years. Additionally, many have served on committees such as the Communities for a Responsible Mather Airport and the Mather Airport Aircraft Overflight Noise Group. Further, some of the members have extensive professional expertise responding to draft environmental impact reports.

The Mather Airport Master Plan Draft EIR Review Committee has serious concerns regarding the conclusions reached regarding the environmental impacts the Mather Airport Air Cargo Operations at Mather Airport will have on the communities of El Dorado Hills, Serrano, Cameron Park, and Rescue. Specific comments are supplied in our attached 35 page analysis of the Mather Airport Master Plan Draft Environmental Impact Report.

**Summary of Analysis**

The Mather Airport Draft Environmental Impact Report fails to show substantial evidence for the conclusions reached.





Mather Airport Draft Environmental Impact Report

September 30, 2012

Page 2 of 3 pages

We request the California Department of Transportation deny the expansion of the Mather Airport runway and landside facilities requested and look at environmentally and economically superior alternative due to:

- The DEIR Grossly underestimates the impacts of over flights on approach over project areas.
- The DEIR provides no regulatory setting upon which impacts can be determined. Conclusions appear to be based upon nothing but the impressions of the EIR authors.
- Inadequate consideration of cumulative impacts on proposed projects east of the Airport.
- Overall noise “analysis” is fundamentally flawed:
- Fails to adequately and clearly present accurate and representative number of proposed flight operations proposed annually.
- Fails to adequately evaluate the impact of potential air operations on certain, present and planned, schools.
- It grossly underestimates the potential operations and associated impacts.
- Does not provide accountability economically for the benefit of the County.

The Committee fully concurs with the El Dorado County Supervisor’s findings as stated in their letter dated September 18, 2012.

Should anyone have any questions or need additional information please contact me at my mobile telephone 916.803.6270.

*Larry Brilliant*

Larry Brilliant, Chair

The Mather Airport Master Plan Draft Environmental Impact Report Review Committee

Attachment: Mather Airport Master Plan Draft Environmental Impact Report Review Committee analyst of the Mather Airport Master Plan DEIR.

cc:

Sacramento County Board of Supervisors



**Mather Airport Draft Environmental Impact Report**

**September 30, 2012**

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**District 1**

**Phil Serna                      SupervisorSerna@saccounty.net**

**District 2**

**Jimmie Yee                      yeema@saccounty.net**

**District 3**

**Susan Peters                      susanpeters@saccounty.net**

**District 4**

**Roberta MacGlashan      macglashanr@saccounty.net**

**District 5**

**Don Nottoli                      nottolid@saccounty.net**

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Mather Airport Master Plan EIR Report Review Committee  
A Sub-Committee of the EDH APAC  
COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT  
MATHER AIRPORT MASTER PLAN  
Control Number: 2002-0325  
State Clearinghouse Number: 2007102040

**Summary**

The Mather Airport Draft Environmental Impact Report fails to show substantial evidence for the conclusions reached.

We request the California Department of Transportation deny the expansion of the Mather Airport runway and landside facilities requested and look at environmentally and economically superior alternative due to:

- The DEIR Grossly underestimates the impacts of over flights on approach over project areas.
- The DEIR provides no regulatory setting upon which impacts can be determined. Conclusions appear to be based upon nothing but the impressions of the EIR authors.
- Inadequate consideration of cumulative impacts on proposed projects east of the Airport.
- Overall noise “analysis” is fundamentally flawed:
- Fails to adequately and clearly present accurate and representative number of proposed flight operations proposed annually.
- Fails to adequately evaluate the impact of potential air operations on certain, present and planned, schools.
- It grossly underestimates the potential operations and associated impacts.
- Does not provide accountability economically for the benefit of the County.

**PREFACE page 1-1**

***“On June 03, 2011, SCAS submitted a revised project to the Sacramento County Department of Environmental Review and Assessment (DERA), which consisted of changes in phasing and/or removal of various project components of the Draft Master Plan. The Sacramento County Director of Airports requested SCAS staff to revise the time frame of the proposed Runway 4L-22R extension from Planning Activity Level 1 (PAL1) to PAL2. The runway extension is included in the analysis of the long-term project in the EIR. Two project components (parking lots along Macready Avenue) have been entirely eliminated from the Project Description. The following description demonstrates the changes with strikethrough font for deletions and bold font to show where projects have been moved to PAL 2 (after being deleted from PAL 1). The project description in Chapter 2 is for the project analyzed in this EIR, which includes the changes specified to the Master Plan indicated below. The technical studies were revised to reflect the revised project description with the exception of the Cultural Reports. The conclusions of the cultural report would not be affected by the revisions in the project.”***

Mather Airport Master Plan EIR Report Review Committee  
A Sub-Committee of the EDH APAC  
COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT  
MATHER AIRPORT MASTER PLAN  
Control Number: 2002-0325  
State Clearinghouse Number: 2007102040

One year prior to the release of this Mather Draft EIR the scoping and scheduling was changed significantly consisting of “changes in phasing and/or removal of various components”. It is impossible to review an EIR for the project with such language as “and/or”. Was the project analyzed for “and” or was the project analyzed for “or the removal alternative”. This demonstrates the proponent’s intent of an open ended EIR with various alternatives not studied or analyzed in a definitive manner. Were both and scenarios fully evaluated? As an example this would equate to someone coming to the County for approval of a project stating the timing of the improvements are going to change or are going to be removed. No project approval at a local agency or State level should ever be granted on such an open ended project description. Changing the schedule of improvements changes many other project items and often times can significantly change the scope of work and resulting environmental impacts. Which scenarios are being analyzing in the EIR changing the phasing or removal of items? The changes are not clear from Paragraph 1 to Paragraph 2. This needs to be better clarified and elaborated on.

The Preface states the scope and schedule were changed but the cultural studies were not. If the conclusions of the cultural report were not evaluated to reflect the changes how could a statement be made in the Draft EIR that it would not affect the revisions in the project. Again scope and schedule changes will affect all studies and must be analyzed for changes in phasing as well as removal or addition of project items. Please describe how this conclusion was arrived at without the project proponent redoing the cultural studies to reflect the changed scope of work. What other studies were not updated as of the changes to the project directed June 3, 2011?

**Scoping Process and Notice of Preparation (NOP) pg. 1-5 to 1-7.**

***“Scoping Meetings” The Mather Airport Draft Master Plan environmental scoping meetings provided agencies and the public the opportunity to learn about the proposed project and the anticipated scope of analysis for the EIR and to provide input to further define and/or refine the proposed scope of analysis for the EIR. To that end, the following scoping meetings were held:***

***Agency Scoping Meeting***

- ☐ ***September 7, 2007, Sacramento***

***Public Scoping Meetings***

- ☐ ***October 16, 2007, Rancho Cordova***
- ☐ ***October 18, 2007, Folsom”***

The Draft EIR fails to adequately include an entire segment of population extensively and irrevocably effected by the project. The Scoping Process stated specific areas were included in the scoping process with the intent of providing input to further define or redefine the proposed scope. These areas were Folsom and Rancho Cordova. El Dorado County residents working with through Area Planning Groups and eventually the El Dorado County Board of Supervisors went

September 16, 2012

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**Mather Airport Master Plan EIR Report Review Committee**  
**A Sub-Committee of the EDH APAC**  
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**Control Number: 2002-0325**  
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on record as early as 1995/ 1996 calling out the significant area wide impacts the project would have on El Dorado County. El Dorado County had significant involvement with Sacramento County Department of Airports and Sacramento County Board of Supervisors asking to be included in the Scoping of the Project. Documented requests were sent to SCAS and Sacramento Board of Supervisors. The response from Sacramento County Department of Airports that El Dorado County stated that El Dorado County was outside of the project boundary and therefore there were no impacts to El Dorado County. This magnifies the flawed methodology that the project proponent has taken in that an area to be impacted is negated because it is across the line from the defined study area as outlined by generalized specific agency policy documents. The intent of the specific agency policy documents is to mitigate impacts and not create additional and inmitigable impacts to effected parties or other local jurisdictions.

State Aeronautics Act of the California Public Utilities Code commencing with Section 21670 (Division 9, part 1, Chapter 4, Article 3.5). 21670. States:

“The Legislature hereby finds and declares that:

It is in the public interest to provide for the orderly development of each public use airport in this state and the area surrounding these airports so as to promote the overall goals and objectives of the California airport noise standards adopted pursuant to Section 21669 and to prevent the creation of new noise and safety problems.”

“In order to achieve the purposes of this article, every county in which there is located an airport which is served by a scheduled airline shall establish an airport land use commission, ALUC”

Mather Airport resides near a County line which has two competing ALUC jurisdictions, one wants expansion of the Airport which puts noise and other impacts squarely over the other County. The other doesn't want the noise and impacts of a project from another County dumped on it to have to be forced to modify and or restrict land uses and additionally be the beneficiary of economic and environmental consequences.

How was an entire population that will be impacted by nearly all facets of the project included the Draft EIR. It does not appear the EIR includes El Dorado County and the City of Folsom in the Study Area of Influence. Were letters, requests for studies and resolution of intention from El Dorado County residents, El Dorado Hills Area Planning Advisory Committee and El Dorado County Board of Supervisors provided to the 12 participating members from the State Agencies?  
Air Resources Board  
Caltrans - District 3  
Caltrans - Aeronautics  
Department of Fish and Game

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**Mather Airport Master Plan EIR Report Review Committee**  
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**Control Number: 2002-0325**  
**State Clearinghouse Number: 2007102040**

Department of Toxic Substance Control  
Office of Emergency Services  
Office of Planning and Research

The State Aeronautics Act of the California Public Utilities Code states 21258. The department shall represent the state and local agencies before the Civil Aeronautics Board and other federal agencies in all matters related to the Airline Deregulation Act of 1978 (P.L. 95-504, as amended) and the essential air service program created by that act. The department shall assist and cooperate with federal, state, and local agencies and private entities in the development of a stable and efficient regional air carrier system.

21006.5. "Department" means the Department of Transportation.

21007. Whenever the term "California Aeronautics Commission," "Division of Aeronautics," or "Department of Aeronautics" is used in any other law, it means the Department of Transportation.

21008. "Director" means the Director of Transportation. Any reference in any law or regulation to the Director of Aeronautics shall be deemed to refer to the Director of Transportation.

The EIR should be recirculated with input and direction from a joint task force directed and overseen by the Department of Transportation that provides for inclusion not only of the lead agency but all effected agencies that have a stake in the outcome of the project and the impacts created and not dismissed because they fall outside of a 3 mile zone from the airport runways. El Dorado County's ALUC should be directly included in all project analysis and have a say in the impacts that routing and over flight operations will have on the Western slope of El Dorado County. The State of California Department of Transportation should protect the rights of adjoining County's by not allowing a County project proponent of an airport to dump over flights and impacts there from into an adjoining County all the while maintaining they have no jurisdiction in the project therefore they are not impacted. The State cannot avoid costly legal actions if data and assumptions used to support the project are taken with the spirit of finding loopholes and knowingly impacting another County but claiming it is their right to do so as they are 9 miles outside of the inclusion limit.

A significant flaw in the project at the inception stage of reuse and expansion of Mather Military Airport to a County Operated Airport is the Airport lies 12 nautical miles from the El Dorado/Sacramento County line. The terrain rises in El Dorado County such that aircraft approaches create significant noise impacts, annoyances and awakenings. The area in El Dorado County affected is outside of the small project boundary of approximately 3 miles surrounding the

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airfield. The project jurisdiction lies within Sacramento County but effects a County with a different and separate ALUC. El Dorado County's ALUC is El Dorado County Transportation Commission, EDCTC and Sacramento County's ALUC is Sacramento Area Council of Governments, SACOG. The operations at Mather have changed contrary to what the project proponent states "that noise cannot be moved." Prior to the early 2000's most departures departed east out over Sacramento County in the early 2000's after many complaints from Sacramento County residents at the time Mather was experiencing a steady stream of Cargo operation increases the County changed the departures to depart east off the runway but turn immediately and go out over El Dorado County as seen in Draft EIR attachments.

Predominately a majority of all approaches descend over the Western Slope of El Dorado County into Mather. This creates a direct negative impact onto another County without jurisdiction of the project. The Department of Transportation needs to proactively recognize and require coordination from Sacramento's ALUC (SACOG) and the effected local agency's ALUC (El Dorado Transportation Commission). The airport is directly and significantly creating impacts in another county and telling them they have no recourse or inclusion because they are outside the study area. It appears this line in the sand approach will not end in anything other than costly litigation for the State of California Department of Transportation.

**2 EXECUTIVE SUMMARY AND MITIGATION MEASURES Page 2-1**

***"Impacts associated with Land Use, Aesthetics, Public Facilities, Hydrology, Water Quality, Air Quality, and Noise are considered less than significant."***

The Draft EIR fails to assess or even recognize the significant noise impact to a large area of El Dorado County western slope and City of Folsom as well as outer lying areas within the region effected by over flights, noise, air quality and other directly associated impacts. Sacramento County Department of Airports continues to reiterate that they don't have to analyze or address because those areas are outside of the 3 mile CLUP project boundary. How was the analysis of "Noise considered Less Than Significant" in the Draft EIR arrived at. Was it solely on the FAA INM version 7.0 weighted average of noise over a 24 hour period against ambient noise levels. The DEIR noise section sites only the FAA model INM version 7.0 as supporting the proponents justification that the expansion of Mather "would not result in an increase in noise levels over sensitive land uses". This demonstrates a fatal flaw in the DEIR Noise section in that Integrated Noise Model, INM version 7.0 with its weighted average approach over a 24 hour period does not representative a real time actual noise impact. This approach although recognized as a tool for noise analysis is not a sole source determination of impact. It does not support the findings of Less Than Significant Impact because the model averages acoustical data of large classification of fixed wing planes with small classifications of fixed wing planes over a 24 hour period relative to ambient noise making the modeled noise significantly less than actual representative

Mather Airport Master Plan EIR Report Review Committee  
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single event noise as shown with SEL readings. The Draft EIR fails to prove by CEQA standards it is not a Less Than Significant Impact.

Taken from the FAA INM Version 7.0

“A subset of the time-based metrics is time audible. Time audible (or audibility) is computed based on a comparison of aircraft noise against ambient noise to determine the time duration (or percentage of time duration) that the noise may be audible to a human observer. For these calculations, the observer is assumed to have normal hearing and to be actively listening for aircraft noise. Time audible also takes into account aircraft operations for a particular time period (e.g., 24 hours). The process is based on detectability theory and is supplemented with research that has assessed human auditory detectability in different environments. In order to represent these different environments, the time audible metrics require highly detailed inputs, including an FAA AEE-approved ambient noise file. More details on ambient noise file requirements can be obtained by contacting FAA AEE.”

“This document (FAA’s INM Technical Manual) was produced by ATAC Corporation and the John A. Volpe National Transportation Systems Center Acoustics Facility staff, who are responsible for the facts and accuracy of the material presented herein. The contents do not necessarily reflect the official views or policy of the U.S. Department of Transportation or the Federal Aviation Administration. This INM Technical Manual does not constitute a standard, specification, or regulation.”

What format was terrain elevation data provided? What was the date of the FAA AEE approved ambient noise file?

***Table ES-1: Executive Summary of Impacts and Mitigation***

***Impacts Level of Significance Before Mitigation 1***

***Mitigation Measure Level of***

***Significance After Mitigation***

***LAND USE***

***Consistency with Adopted Plans pg 2-3***

***“The project would not result in any additional land use restrictions outside the airport boundary.***

***The proposed project will not divide, disrupt, or displace existing businesses or residences. There are no known conflicts with any applicable land use plans.***

***Impact Rating: Less than significant LS”***

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How did the Draft EIR determine that the project would not result in any additional land use restrictions and given a designation of impact as less than significant? The imposed restrictions to land use in Folsom and Western Slope of El Dorado County due to noise and flyovers of approaches to airport runways at elevations of 800 - 1500 foot range on average above locations in El Dorado County on approach. These altitudes and resultant noise will definitely impose land use restrictions to El Dorado County and City of Folsom, there are land uses now within these areas that could be potentially reduced or abandoned due to over flights, and associated impacts outside the airport boundary.

***Table ES-1: Executive Summary of Impacts and Mitigation***  
***Impacts Level of Significance Before Mitigation 1***  
***Mitigation Measure Level of***  
***Significance After Mitigation***  
***LAND USE***

***Navigable Airspace (within the project boundary) pg. 2-3***  
***“The Approach/Departure Zone that is outside the airport boundary is within the City of Rancho Cordova, Zinfandel Special Planning Area, and it is zoned for business/professional (BP). Uses within this zone typically consist of office buildings and associated services. Uses within the Arrival/Departure Zone are currently subject to height restrictions. The project would not result in any additional land use restrictions outside the airport boundary. Impact Rating: Less than significant LS”***

The heading for Navigable Airspace states “within the project boundary” although the first sentence states “The Approach/Departure Zone that is outside the airport boundary is within the City of Rancho Cordova, Zinfandel Special Planning Area, and it is zoned for business/professional (BP).” “and goes on to say “The project would not result in any additional land use restrictions outside the airport boundary.” This is a confusing a misleading description of Navigable space (within the Project boundary) when the Draft EIR goes on to talk about “outside the project boundary”. Is the less than significant impact designation given for navigable space within or outside the project boundary? How was this assessment arrived at that the project would not result in any additional land use restrictions outside the airport boundary? At Sacramento County Board of Supervisor Meetings in the late 1990’s the Board extensively discussed land use restrictions outside of the “project boundary” in outer lying areas and at one point spent considerable dialog on limiting development and restricting land uses under the airport approaches in the navigable space of the project defined as the open land south of Hwy 50 in the City of Folsom, Rancho Cordova and Sacramento County bounded by Hwy 50, Prairie City Road and Sunrise Blvd.

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***Table ES-1: Executive Summary of Impacts and Mitigation  
Impacts Level of Significance Before Mitigation 1  
Mitigation Measure Level of  
Significance After Mitigation  
AESTHETICS***

***Light Emissions pg. 2-3***

***“The light emissions from the proposed project would not be discernible against existing ambient light. The lights would not shine directly into any existing or proposed light sensitive land use or create an annoyance to people in the vicinity or interfere with their normal activities. The lights for the airport facilities included in the proposed project would not cause new significant light emission impacts on sensitive land uses.***

***Impact Rating: Less than significant LS”***

How was this conclusion arrived at that lights would not shine directly into any existing or proposed light sensitive land use and create annoyance to people in the vicinity or interfere with normal activities? This is an incorrect statement of findings that the Draft EIR is basing a Less Than Significant Impact rating. Aesthetics and Noise are too very significant impacts to the eastern approaches of the proposed Mather Cargo expansion. Way at very early hours of the morning on numerous occasions. There are documented calls into SCAS noise report line of this. There were complaints from residents in EL Dorado Hills about this in the early 2000's that stated they were awoken by aircraft lights. The DEIR fails to show that light emissions are not an impact to the areas under approaches and misleads the outcome of the Environmental Impact Report.

***Table ES-1: Executive Summary of Impacts and Mitigation  
Impacts Level of Significance Before Mitigation 1  
Mitigation Measure Level of  
Significance After Mitigation  
Visual Impacts pg 2-3***

***“The view shed consists of existing airfield facilities. The proposed project includes facilities that would be expected to be seen at an airport and would not change the visual character of the airport; therefore, there would not be a significant impact to the view shed. In addition, views of new facilities would primarily be visible only from within the airport and airport access roads. Aesthetic impacts***

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*associated with the proposed project may be perceived differently by various affected individuals, but are not considered significantly adverse due to the low visibility of project facilities to the general public, and the visual continuity between existing airport facilities and new facilities proposed for the Master Plan project.  
Impact Rating: Less than significant LS”*

The visual impact section only discusses visual impacts of landside facilities and gives no discussion of visual impacts from areas under approaches of the proposed numerous over flights. To date approaches in the Western slope of El Dorado County and City of Folsom have been recorded as low as 800ft above the ground as documented on the SCAS flight track database. With proposed annual of 300,000 annually how does the DEIR quantify this many low flying aircraft over rural, low and medium density land uses as Less Than Significant. This would be extremely intrusive and visually contrasting from the existing conditions to project plus 2015.

***Table ES-1: Executive Summary of Impacts and Mitigation  
Impacts Level of Significance Before Mitigation 1  
Mitigation Measure Level of  
Significance After Mitigation  
PUBLIC SERVICES  
Fire Protection pg 2-3  
“The current Air Rescue and Fire Fighting (ARFF) facilities  
meet the projected planned aviation operations of the Airport.  
Impact Rating: Less than significant LS”***

How was this determined if the Fire District did not comment?

***Table ES-1: Executive Summary of Impacts and Mitigation  
Impacts Level of Significance Before Mitigation 1  
Mitigation Measure Level of  
Significance After Mitigation  
NOISE  
Noise Exposure pg 2-7  
“Noise contours prepared with the Federal Aviation  
Administration’s (FAA) Integrated Noise Model (INM,  
Version 7.0a) and FAA approved aviation forecast levels  
and fleet mix showed that the proposed project would not  
result in an increase in noise levels over sensitive land uses.  
Noise contours for Existing and 2015 (Project and No***

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***Airport Comprehensive Land Use Plan. Under existing and 2015 (no project) conditions, there are no noise-sensitive facilities or residential population exposed to aircraft noise exposure levels at or above 65 CNEL, and there are only two residential dwelling units exposed to 60-65 CNEL.***

***There are no residents or dwelling units exposed to aircraft noise levels at or above CNEL 65. There are no other noise-sensitive facilities (such as schools, places of worship, hospitals or convalescence homes) exposed to aircraft noise levels at or above CNEL 65.***

***Impact Rating: Less than significant LS"***

This is extensively misleading, The FAA INM version 7.0 in simplistic terms is a weighted average of noise that averages noise from large aircraft with noise from small aircraft and averages them over a 24 hour period against ambient noise. The result is noise data that is significantly lower than an actual jet overhead single event noise. The Noise section fatal flaw is that the legitimate noise impact resulting from this project with wide reaching effects is being dismissed in the DEIR by stating the areas that will be experiencing these events will be outside the study sphere of Influence and that determination of noise impact is being done with a model that averages the noise to a lesser degree with different mix of aircraft over a 24 hour period resulting in lower values than an actual noise event. The intent of the California Environmental Quality Act is to have full disclosure and understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account. This is project will have far reaching effects that will forever change the landscape and existing conditions of more than just Sacramento County. The noise resulting from the proposed operations must be transparent as well as the number of operations. The Sacramento County Airport Policy Plan issued Aug. 28, 2001 forecasted operations which were defined as takeoffs and landings of 116,700 per year in 2020 at build out. The number was increased a few years later at the beginning stages of the NOP. After an outcry from the public as to the over flight impacts from this many operations the Sacramento County Department of Airports started representing takeoffs and landings in tons of cargo annually. The proposed number of operations at 5 years, 10 years and 20 years must be transparent and represented in terms for the general public per the intent of CEQA and NEPA law. The real time representative noise measurement of actual noise events must be transparent and understandable to the general public for this magnitude of a project with significant regional effects that will have consequences well into the future.

***Table ES-1: Executive Summary of Impacts and Mitigation  
Impacts Level of Significance Before Mitigation 1  
Mitigation Measure Level of***

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***Significance After Mitigation***

***Single Event Noise***

***Classroom Disruption pg 2-8 and 2-9***

***“The noise analysis indicates that the predicted interior aircraft noise levels are well below FAA’s design objective of 45 dBA for the annual average school day. The analysis also indicated that, interior noise levels are well below the CHPS criteria of 35 dBA. The analysis indicates, however, that the more stringent ANSI design standard of a maximum noise level of 35 dBA would be exceeded for up to 19.5 minutes per day with the windows closed in 2025, compared to 17.4 minutes for existing conditions – an increase of 2.1 minutes. Oak Ridge High School may experience maximum noise levels above 35 dBA in 2025 for 4.3 minutes with the windows closed compared to 2.6 minutes for existing conditions – an increase of 1.7 minutes. This indicates that depending on other (non-aircraft) noise levels in the classroom, there may be times when overflights by the loudest aircraft may require increased teacher voice effort at both schools. This increase in the amount of time that interior noise levels exceed 35 dBA for future conditions would, however, occur irrespective of whether or not the proposed project is implemented. The growth forecast completed for Mather Airport indicates that the future activity levels are not constrained by the existing facilities at the airport and are not dependent on the proposed modifications. Impact rating: Not Applicable”***

The EIR fails to demonstrate that future activity levels are not dependent on the proposed modifications. The maximum number of operations that can be accommodated at the build-out of planned landside facilities is being reported in this Draft Environmental Impact Report as 25,550 operations annually. But on Aug. 28, 2001 the Sacramento County Airport Policy Plan issued a forecast starting in the year 2020 of 116,700 flight operations per year. In 2006 the County issued a forecast of 600 flights PER DAY or 219,000 operations annually (operations which are defined as a takeoff and landing). The FAA states an annual service volume (defined by FAA as a reasonable estimate of the total number of operations the airport can accommodate) for Mather is 300,000 operations annually – much, much greater than the theoretic capacity.

That equates to a lot of classroom time interruption. With school time reduced per day and condensed curriculum loss of even a half hour is critical at the high school level. This would equate to much more than a loss of a half hour a day. The Draft EIR fails to transparently state the number of operations that will be expected at 2015 and 2025 respectively. This is a fatal flaw

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sited on numerous occasions to Sacramento County Board of Supervisors and that the State of California Department of Transportation should now step in as last line project approval and require transparent and representative data as is required by California Environmental Quality Act (CEQA) and National Environmental Protection Agency (NEPA) law. The two most overtly flawed parts of this project are the presentation of true noise data and number of operations that the airports accommodate. In presentations, meetings and public media Sacramento Department of Airports countered the allowable capacity numbers with statements that we will never reach that many flights a day. It doesn't matter what the County feels they will or will not reach what matters is the project is evaluated on the potential capacity.

The EIR failed to evaluate the impact of potential air operations on certain, present and planned, Folsom-Cordova schools. A large and growing body of scientific evidence shows that jet aircraft noise has a significant negative impact on learning. Of particular concern was a study by Clark et al, published in the American Journal of Epidemiology in 2006 which found a negative impact on reading comprehension due to aircraft noise but no evidence of a relationship between road traffic noise and children's ability to learn. Why? *"Aircraft noise is more intense and less predictable than road noise. The transient nature of aircraft flyovers, which have high short-term noise levels, may disrupt children's concentration . . . while the constant nature of road traffic may allow children to habituate. . ."* That paper and others, such as the Transportation Research Board September 2008 report stating that the lack of noise-learning relationships suitable for setting policy is of critical concern, re-enforce long-held doubts about current aircraft-induced classroom noise criteria. **Specifically:**

- The "classroom disruption" section of the EIR is deficient in that results for only two schools - Oak Ridge High School and Sunrise Elementary School – are presented; and only FAA forecast operations were considered, but not those quite possible in the 2025 timeframe (as discussed in item 2 above).
- The impact on three existing schools in Folsom and 24 planned schools in the Folsom-Cordova District was ignored. The schools - Folsom High, Gold Ridge Elementary, and Vista del Lago High - are close to the centerlines of runways 22L and 22R, and under the ILS and RNAV approach courses. They are subjected to over flight noise on a regular basis throughout the school day.
- In April 2007 a \$750 million bond issue was approved by voters to help finance 24 new schools in the approach corridor to Mather Airport. Thirteen of the proposed sites are about 3 miles from the approach end of runways 22L/22R. All sites are subject to direct over flight by aircraft on approach into Mather. Clearly the classrooms at these new schools will have to be sound-proofed. The questions are: (1) at what cost and (2) will



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sound-proofing alone be sufficient to mitigate learning impairment since not all school activities take place the classroom? A conservative approach is required since new discoveries, such as Clark's, could be forthcoming.

- Given the huge investment in school construction and the importance of a quality education for every student, responsible decision-makers need thorough noise analysis including that for air traffic levels far above the FAA forecast (as discussed in item 2 above) so that they might know just where the proposed Mather Airport expansion journey will lead and the attendant price tag.

The Draft EIR s" Time and experience in many communities have proven that the traditional CNEL 65 dB contour, based on a 20-year forecast to determine aircraft noise compatibility, is insufficient for airport land use planning."

***Table ES-1: Executive Summary of Impacts and Mitigation  
Impacts Level of Significance Before Mitigation 1  
Mitigation Measure Level of  
Significance After Mitigation  
Nighttime Awakenings pg 2-10***

***Smaller increases in future noise levels would occur in residential areas located east and northeast of Mather Airport, where the percent of population potentially awakened by aircraft noise would generally be less than seven percent in 2025. For most of the subject areas, this would be an increase of less than one percent compared to existing (2007) scenario, with the exception of areas directly beneath the Airport approach path, which would experience an increase of between 1.1 percent and 4 percent compared to the existing scenario.***

***It is important to note that, for the most part, all of aforementioned future noise level increases, and associated percentages of populations potentially awakened, would occur with or without the proposed project. Future increases in the percent of population potentially awakened at specific residential sites would be less than 1 percent greater for With Project scenarios than for No Project scenarios, with the majority of the sites experiencing no difference between With Project and No Project scenarios relative to the percent of population potentially awakened.***

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*It should also be noted that this analysis assumed the residences would have their windows open during the night. A windows-closed scenario would reduce the number of potential awakenings.*

*Impact rating: Not Applicable*

*Mitigation: None recommended*

**3 PROJECT CHARACTERISTICS page 3-1**

*“The Environmental Impact Report includes project level analysis for the near-term project list to be completed by 2015. Long term projects, which are expected to be completed by 2025, are analyzed under the cumulative scenario; however, they may require additional environmental review in the future.”*

“Long term projects, which are expected to be completed by 2025, are analyzed under the cumulative scenario; however, they may require additional environmental review in the future.” This implies that the entire project has not been analyzed under an existing plus project scenario. What is the cumulative context for the project, including build out year, and does the analysis in the EIR adequately consider project impacts on the existing conditions? It is inappropriate to discuss project-specific impacts only in the context of the cumulative condition. CEQA requires the project impacts be discussed relative to the “baseline” (CEQA Guidelines 15125); including the discussion of project components only in the context of the cumulative condition understates the project effects and deprives the public and decision makers of essential information regarding project-specific impacts.

**PROJECT OBJECTIVES page 3.11 – 3.12**

The project objectives are interesting in that they do not include objectives to construct any improvements at the facility or increase operations in any way. A project consistent with these objectives need only include recommendations for “facilities, phasing, and a financial plan that allows the Mather Airport to accommodate user needs under alternative roles.” Please define “user needs under alternative roles.” Although this phrase was not defined in the EIR, the project applicant was able to define the physical changes associated with the project. The project description provides no information regarding the operational increases that would result at Mather due to the physical improvements described, but only implies or states in other sections of the EIR that the increases in operations at Mather would occur with or without the project. If that were the case, it must be assumed that the airport in its existing configuration can accommodate this “inevitable” growth at Mather. Thus, a “No Project Alternative” would be the environmentally superior alternative under CEQA and should be adopted as a feasible – and much less costly – way to reduce project impacts.

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Although the project has the potential to negatively affect residents a dozen or more miles from the project site itself, the project description contains only 12 pages of description, 5 of which are figures. With respect to an EIR's project description, four items are mandatory: (1) a detailed map with the precise location and boundaries of the proposed project, (2) a statement of project objectives, (3) a general description of the project's technical, economic, and environmental characteristics, and (4) a statement briefly describing the intended uses of the EIR and listing the agencies involved with and the approvals required for implementation. (CEQA Guidelines 15124) The project description includes no statement describing the intended uses of the EIR nor does it list the agencies involved with and the approvals required for implementation.

The project itself is inconsistent with the project objectives because it includes implementation of a plan with construction of physical improvements, which is well beyond the project's stated objectives of developing recommendations for future needs at Mather.

"The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account. [Citation.] For the EIR to serve these goals it must present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made." (Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 449-450 (Vineyard Area Citizens).) The project description is silent with regard to the level of operations that would occur with the proposed project. The project description must include sufficient detail to provide information needed for evaluation and review of the environmental impacts (CEQA Guidelines 15124). However, the EIR project description only provides proposed alterations to the physical facilities and makes no attempt to quantify the growth that would occur based on the provision of these improved facilities. There will obviously be operational changes that result from these improvements, yet these are not disclosed as part of the project or included in the objectives of the project.

The Sacramento County Board of Supervisors was concerned enough about greater traffic levels that on April 19, 2006, they voted to include the "theoretic operational capacity" in the environmental studies for land use planning and for the draft Mather Airport Master Plan. The "theoretic capacity" was defined in a paper by Leigh Fisher Associates entitled, "*Mather Air Cargo Operations Capability*." It is the maximum number of operations that can be accommodated at the build-out of planned landside facilities. Leigh Fisher found that Mather could accommodate an annual average of 70 daily cargo operations, or 25,550 operations

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annually vs. 6,534 cargo operations for the year 2025 used in the EIR. Apparently, the Supervisors' direction was not followed. Further, the Leigh Fisher study did not consider cargo facilities that could be located on the almost 300 additional acres reserved for landside facilities. It should also be noted the annual service volume (defined by FAA as a reasonable estimate of the total number of operations the airport can accommodate) for Mather is 300,000 operations annually – much, much greater than the theoretic capacity. It is apparent the physical improvements at the airport would provide operational capacity that is well beyond the levels analyzed in the EIR. Thus, the EIR must disclose the proposed operations, as part of the project description, not future projections as is included in some of the technical sections in the EIR.

- What will the operational changes be?
- What types of aircraft will be used?
- How many flights per day and per year?
- What times of day will the flights occur?
- What are the noise levels associated with the types of planes planned to be used?

This information must be included in the project description. Without disclosure of the operational changes as part of the project description, the County cannot approve operational changes at Mather.

The Noise analysis in the EIR (p.9-50) provides a forecast of aircraft operations for 2025 that assumes an annual total of 110,634 flights. Does the County propose to restrict the ultimate operations at the facility to 110,634 flights? If the County does not intend to limit the operations at Mather to the levels used in the EIR analysis, the number of flights and, thus, the project impacts, could far exceed that disclosed in the EIR. If the County would limit the operations, how will such restrictions be monitored and regulated? How can the public be assured that the impacts would not exceed those disclosed in the EIR?

What approaches will the air traffic use and what are restrictions on altitude, if any? Without this information, the EIR fails to establish the location of sensitive receptors relative to the area of impact of the project.

Without this information in the EIR, the EIR fails to analyze important aspects of the project:

The EIR failed to consider certain uses of runway 4L/22R when extended to a length suitable for large cargo jet operations. Based on the claim that it would be used only as a backup for 22L, the EIR assumed that only 2% of the cargo jet operations will use the extended runway 22R. The actual use of the extended runway is beyond the control of the County. On the day the Board of Supervisors approved the draft Master Plan (February 17, 2004), Mr. Rob Leonard, SCAS COO,

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cited San Jose as an example of backup runway funded by FAA. Folsom Mayor, Steve Miklos, directed the City's aviation consultant, Vincent Mellone to investigate. Mr. Mellone reported on February 27 that FAA used the extended runway (30R/12L) at San Jose on a routine basis for both arrivals and departures.

The EIR failed to evaluate jet cargo air traffic using the published flight pattern for Runway 22R. Published procedures call for right traffic at 1,800 feet MSL (over Carmichael, Fair Oaks, and Orangevale).

The EIR failed to evaluate jet cargo flights on traffic safety offsets while inbound to Runway 22R when planes are also on approach to Runway 22L (see attached graphic). The runway layout for 22L and 22R meet FAA criteria for same direction, simultaneous operations under VFR conditions (93% of the time).

The EIR failed to consider the possibility that cargo air operations will be much greater than the FAA forecast of 1.5% annual growth and that sleep disturbance would be far greater under these realistic scenarios. Growth, after all, is the County's expressed intent. "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 6/24/98.* "Conveniently located between the Pacific Rim and Europe the County operates Mather as a cargo aviation facility with a goal of making it into a premier cargo hub. . . The goals for air cargo include the continued expansion of cargo operations at Mather airport including cargo shipments to and from Asia." *Chery Marcell, Director of Marketing and Public Relations, Sacramento County Airport System, 8/24/05.*

The EIR failed to consider that Mather could become a large cargo hub – a point for transshipment of freight to distant cities. Here is a sobering quote from the July 2008 *SACOG Regional Goods Movement Study*. "Forecasting future levels of air cargo at SMF [Sacramento International] and MHR [Mather] is problematic. . . The operating strategies of those carriers are dictated by . . . their need to move air cargo through complex national and international transportation networks where timing is critical. Much of the air cargo handled at the two airports is being transferred between aircraft, not starting or ending its trip in the SACOG region. The selection of SMF or MHR as a "hub" for one or more carriers is based on the airport's location within the carrier's network, not on local cargo business. What the air carriers regard as optimal routing patterns can and do change, sometimes abruptly, and for reasons which are often opaque to an outside observer".

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The EIR failed to consider that FedEx could move its operations from Sacramento International to Mather on very short notice. Here are comments from County officials (as quoted in *Comstock's Business*, 8/2004, p 59-61): "As a public airport that received federal funds, we cannot force all our cargo operations to relocate to Mather. We make Mather appealing by favorable lease rates and other means." . . . As for Federal Express and its operation at Sacramento International, "We're talking to them and we believe they will move."

The EIR failed to consider that UPS could move a portion of its Ontario, CA operations to Mather. Quoting again from the *Comstock's* article, "Right now, the UPS mini hub is in Ontario, down near Los Angeles. We're basically talking to UPS about a better airport, with less congestion." (Note: there is no way Mather can be a better airport than Ontario without extending Runway 4R/22L to make a second cargo runway.)

The EIR failed to consider that "The fast-growing China market could become a huge new source of growth for international cargo business at Mather Airport." *Sacramento Business J. "Study sees China as a huge boost to Mather,"* 4/15/05.

The EIR failed to evaluate the impact of potential air operations on certain, present and planned, Folsom-Cordova schools. A large and growing body of scientific evidence shows that jet aircraft noise has a significant negative impact on learning. Of particular concern was a study by Clark et al, published in the *American Journal of Epidemiology* in 2006 which found a negative impact on reading comprehension due to aircraft noise but no evidence of a relationship between road traffic noise and children's ability to learn. Why? "*Aircraft noise is more intense and less predictable than road noise. The transient nature of aircraft flyovers, which have high short-term noise levels, may disrupt children's concentration . . . while the constant nature of road traffic may allow children to habituate. . .*" That paper and others, such as the Transportation Research Board September 2008 report stating that the lack of noise-learning relationships suitable for setting policy is of critical concern, re-enforce long-held doubts about current aircraft-induced classroom noise criteria.

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In April 2007 a \$750 million bond issue was approved by voters to help finance 24 new schools in the approach corridor to Mather Airport. Thirteen of the proposed sites are about 3 miles from the approach end of runways 22L/22R. All sites are subject to direct over flight by aircraft on approach into Mather. Clearly the classrooms at these new schools will have to be sound-

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proofed. The questions are: (1) at what cost and (2) will sound-proofing alone be sufficient to mitigate learning impairment since not all school activities take place the classroom?

The project description fails in its primary purpose, which is to define the project under consideration. The EIR must detail the level of operations that would be accommodated by the improved facilities. Without this information, there is no basis on which the project analysis can accurately determine the potential effects of the project.

**4 ALTERNATIVES page 4-1**

**PROJECT OBJECTIVES**

*“Section 15126 (d) of the CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to a project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the substantial effects of the project, and to evaluate the comparative merits of the alternatives. The CEQA Guidelines require that a “no project alternative” be evaluated, and that an environmentally superior alternative be designated. If the alternative with the fewest or least severe environmental impacts is the “no project alternative”, one of the other alternatives should be designated environmentally superior.*

EIR page 4-1 states, “The project objectives are used to develop and analyze a reasonable range of alternatives.” However, this statement misses the point of CEQA Guidelines 15126.6(a), which states that the EIR should analyze alternates that “would feasibly attain most of the basic objectives of the project but *would avoid or substantially lessen any of the significant effects of the project.*” (emphasis added). It does not appear that the EIR took the significant effects of the project into consideration when developing project objectives, but simply repeated options considered in the Draft Master

Plan, but had already rejected prior to drafting of the EIR. This is clearly inconsistent with the CEQA process when the alternatives considered were those that had already been rejected by the project applicant prior to consideration of environmental effects of the project.

The EIR does not include the jump from the project’s stated objectives, which would ultimately lead only to recommendations for the Mather Airport, to the physical improvements included in each of the alternatives (including the proposed project). We request that the proposed project maintain consistency with the objectives and include no development at Mather and no increase in operations at Mather.

The EIR failed to analyze the effects of future Project expansion; instead the Project was examined in a piecemeal manner. The Project expands Mather Airport with three new cargo sort facilities, greatly enlarged apron space, a second cargo runway, a high speed exit taxiway, and many other amenities with the expressed purpose of creating a “premier” air cargo hub and

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attracting as much business as possible, including international cargo flights. The environmental study focused on the first phase of the project (items to be built through 2015) and on fewer air cargo operations than were actually conducted in the year 2000.

- Here is a quote from the EIR (p 3-1): The EIR “included project level analysis for the near-term project list to be completed by 2015. Long-term projects, which are to be completed by 2025, are analyzed under the cumulative scenario; however they may require additional environmental review in the future.”
- Here is an appellate court ruling: “The [CEQA authorized] EIR is intended to furnish both the road map and the environmental price tag for a project, so the decision maker and the public both know before the journey begins, just where the journey will lead, and how much they – and the environment – will have to give up in order to make that journey. . . We remand with directions that the trial court order the City to prepare a project-specific EIR that covers all phases of the Project.” [NRDC vs. City of Los Angeles (2002) 103 Cal. App. 4<sup>th</sup> 268,271.] The EIR doesn’t show where the Master Plan journey will lead nor does it provide a price tag. For example, noise analysis was done for 6,534 jet cargo operations annually, yet SCAS calculates that at build-out of planned land-side facilities Mather could accommodate 25,500 jet cargo operations annually.
- The California Supreme Court in Laurel Heights 1 [No. S001922, 12/1/88] concluded: “We hold that an EIR must include an analysis of the environmental effects of future expansions or actions if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.”

**Airfield Alternatives page 4-2**

Each of the described contains only changes to the length of the runway. This raises several questions:

- Were operational or physical improvements, other than runway length, considered for change in any of the alternatives?
- How do the changes in the length of the runway correspond to the impacts identified for the project?
- Were physical impacts of runway construction the only consideration in the development of alternatives?



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- Were effects of increased flights on noise along the flight path considered when developing alternatives?

**NO PROJECT ALTERNATIVE page 4-5**

“The impacts are not substantially different between the Project and No Project Alternatives for air quality, climate change, and noise.”

**NO PROJECT ALTERNATIVE page 4-4**

*“Under the No project Alternative, none of the airfield or landside improvements would be implemented. Mather Airport would continue to serve the aviation fleet that it can currently accommodate. The current landside facilities related to air cargo, general aviation, poor weather instrument approach capability and airport operations would remain. The runway would not be lengthened or modified; therefore, diversion to Sacramento International Airport would continue during maintenance of the primary runway and certain unfavorable weather or visual conditions.*

*Under the No Project Alternative, flight operations at Mather Airport are expected to be essentially the same as under the proposed project. The only change would be that flight diversions that occur due to poor visibility would not occur with the upgraded Instrument Landing System.”*

The presumption that the only change of Mather operating at the No Project Alternative would be flight diversions and that the flight operations at Mather are expected to be essentially the same as under the proposed project is absolutely misleading. The Department of Transportation should require a thorough evaluation of this misleading representation of the project at existing conditions and the project plus improvements. This statement significantly misleads the public from airport improvements that are proposed to allow capacity of 300,000 take offs and landings per year. As stated in Sacramento County’s own documents.

**USE OF ANOTHER AIRPORT page 4-8**

*“The use of another existing airport in Sacramento County was considered as an alternative to the proposed project. Use of Sacramento International Airport (SMF), which has been designated as the commercial airport by Sacramento County Airport Systems, would be inconsistent with the County’s Airport System Policy Plan (2003) which designates Mather Airport for air cargo and general aviation uses within the airport system. Additionally, new apron, cargo buildings and landside roadways would need to be constructed at significant cost. Use of SMF would not meet the project objectives. Cargo planes are traditionally delayed in favor of passenger planes. The other airports within the airport system, Executive Airport and Franklin Field, do not have the facilities or infrastructure to support the forecasted cargo*

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***activity. This alternative would not meet the project objectives or the need for a reliable, dedicated air cargo airport."***

The EIR dismisses Sacramento International Airport (SMF) from further analysis in the EIR as an alternative location for the project because it would be "inconsistent with the County's Airport System Policy Plan (2003) which designates Mather Airport for air cargo and general aviation uses within the airport system." However, as noted in the EIR, SMF is currently used for cargo flight diversions from Mather when there are poor visibility conditions and SMF currently operates cargo operations for other cargo carriers. In addition, cargo hubs in the U.S and the world continue to be co-located with major passenger airports for the simple reason that the infrastructure and accessibility of roads and highways to these airports are the most important component of a successful cargo hub. Mather does not have this advantage and would add to the already bottlenecked Highway 50 & I5 interchange. SMF with its access to Interstates 5 & 80 offer better trucking access. In fact, Alliance Fort Worth Airport (AFW) developed by Ross Perot, and Rickenbacker (LCK) of Ohio, are examples of airports converted to stand alone cargo hubs that have not been successful because of their lack of access. Finally, the EIR does not state what SMF is designated in the County's Airport System Policy Plan. What is the designation for SMF in the County's Airport System Policy Plan? Is Mather the only airport designated for air cargo and general aviation uses?

The EIR also states "Cargo airplanes are traditionally delayed in favor of passenger planes." This statement is blatantly not true. Scheduled carriers are given no priority based on the contents of the aircraft. FedEx and UPS are scheduled carriers. Further, non-scheduled carriers departure times are based solely on filing of flight plans and again no differentiation is placed on aircraft contents.

An objective analysis of the SMF alternative would find that:

1. SMF already has three CAT III ILS approach courses and plans to create a fourth; whereas developing a single CAT III ILS approach (to Runway 22L) at Mather is estimated to cost \$10 million.
2. SMF already has parallel runways suitable for Mather cargo traffic. The approved SMF Master Plan calls for lengthening Runway 16L/34R to 11,000 feet to accommodate heavier passenger and cargo aircraft should they choose Sacramento in the future. (The 2011-12 CIP identifies \$2 million for design.) Whereas a rather short, parallel, second cargo runway (4L/22R) at Mather is estimated to cost \$22.5 million.

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3. SMF runways are spaced 6,000 feet apart allowing dual simultaneous precision instrument approaches; whereas Mather runways are separated by only 900 feet, making them unsuitable for simultaneous instrument approaches.
4. SMF enplaned 33,000 tons of cargo in CY 2011. (Mather enplaned only 19,000 tons.) The SMF Master Plan provides for enplaning 113,000 tons of cargo annually by expanding cargo building floor space and the adjacent apron. Thus SMF cargo capacity could grow by over 300% within the bounds of the approved Master Plan.
5. Air traffic associated with expanded cargo operations at SMF would not be an issue. While ranking 37<sup>th</sup> nationally in passengers, SMF is operating at only 29% of capacity. It doesn't even make FAA's list of 50 busiest airports. The bulk of air cargo flights operate at night when few passenger flights are scheduled.

It appears the EIR relies solely upon Mather's designation to eliminate SMF as a viable alternative, but not objectively consider SMF's existing uses and capacity when considering it for an alternative site. An analysis of the SMF alternative must be considered in the EIR as it would have fewer significant effects than increased operations at Mather.

**ENVIRONMENTALLY SUPERIOR ALTERNATIVE page 4-8**

***"The Environmentally Superior Alternative is the Proposed Master Plan. Alternative locations and airports were considered but considered infeasible. The Wetland Avoidance Alternative could reduce impacts to wetlands at the end of runway 22R, but until the extension is proposed and reviewed by the FAA, it is not known whether this alternative is feasible. "***

The EIR fails to identify an environmentally superior alternative that is feasible. Using SMF would be a feasible alternative and it would be environmentally superior to the increased operations at Mather if the EIR were to objectively analyze the project effects.

**5 LAND USE BACKGROUND**

**ENVIRONMENTAL SETTING page 5-1**

***"Air traffic patterns extend into El Dorado County and land uses are affected by aircraft noise."***

This is the first acknowledgement of the noise impacts to El Dorado County. It is glossed over and treated very innocuous. Throughout the Draft EIR project document noise outside the immediate CLUP zone designated by the INM model was the only conversation on noise impact. Here a brief mention of noise extending into an adjoining County for the first time is stated in the Draft EIR. El Dorado Hills is 12 nm from airport runway 22L and City of Folsom even closer.

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Over the 17 years of involvement with this project the project proponent has been dismissive and evasive on noise impacts and ensuing land use restrictions as a result of increased noise. Per CEQA law the CNEL is not only a test of impact from noise. Aircraft flyovers at low altitudes over rural lands in the foothills is quite different in perspective and level of noise tolerance than over an urban area. The noise perception is much greater in areas of tranquil rural settings and should be analyzed as to the impacts this would result in.

**LAND USE page 5-2**

It seems incongruous that the Sacramento County General Plan established a Policy Area with the intent of the Policy Area to “increase the awareness of future residents of their possible exposure to aircraft operations; to limit the potential for conflict between the airport and adjacent communities”, yet the only significant and unavoidable impacts identified in this EIR related to major construction at Mather and a more than ten-fold increase in cargo over flights in the areas Folsom and El Dorado County as well as other outlying areas under approaches are only called out as significant and unavoidable with respect to the cumulative traffic impacts and climate change impacts as outlined as related to cumulative traffic impacts and climate change? It is clear that this EIR has severely understated the impacts of this project. Specifically, impacts related to noise, visual intrusion and air quality over rural and semi-rural areas where sensitivity is gauged at a much different awareness than 3 miles outside of airport have been inadequately addressed and those effects have been grossly understated for areas outside the immediate vicinity of the airport. In fact, Caltrans Division of Aeronautics has previously gone on record that noise impacts in portions of El Dorado County due to operations at Mather would be potentially significant.

California Department of Transportation Division of Aeronautics to El Dorado County Local Area Formation Commission (LAFCO) regarding DEIR SCH# 2004082113, March 18, 2005.

**AIRPORT LAND USE POLICY**

**INTRODUCTION 5-3**

***“Airports have widespread and potentially severe impacts on surrounding land uses. As a result, Article 3.5 of the Public Utilities Code of the State of California requires the formation of an Airport Land Use Commission (ALUC) which is charged with preparing a Comprehensive Land Use Plan (CLUP) for every public use airport in the county. The Sacramento Area Council of Governments acts as the ALUC for this area. The CLUP addresses issues of airport noise and safety, with the intent of protecting airport operations from encroachment by no compatible land uses, as well as protecting the citizens on from the impacts of excessive noise and aircraft accidents. The CLUP policies relate to Noise, Safety and Land Use.”***

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SACOG under the Public Utilities Code acting as Airport Land Use Commission failed to address noise issues in adjacent communities that will be directly impacted by over flights. SACOG as the ALUC of jurisdiction has the duty to protect the interest of regions affected by the impacts of the project and not support the denial of the impacts. The ALUC of jurisdiction failed to adequately protect the citizens in outlying areas from impacts of excessive noise and over flights. What has the ALUC of jurisdiction, SACOG, done as is defined in their job description in limiting and protecting citizens from excessive noise from the proposed numerous over flights of a proposed major cargo hub. SACOG has a duty to protect the State of California from legal suits by doing their job. The State of California becomes open to CEQA litigation for ALUC not doing what they are tasked to do.

**Noise Zones: page 5-4**

*“Noise that emanates away from airstrips and airplane flight paths is represented by concentric noise contours around the airport. The contours delineate zones where land use is restricted, protecting the citizens from the detrimental effects of exposure to excessive airplane noise. The contours are constructed using the FAA’s Integrated Noise Model. The result is a 24-hour day/night average called either Day- Night Average Sound Level (DNL) or Community Noise Equivalent Level (CNEL). The cumulative noise descriptor required for aircraft noise analyses in the State of California is the CNEL. The actual noise levels around an airport are a function of the number, time of day, and frequency of operations of each aircraft type. Noise levels are also influenced by the variations in monthly and seasonal flight schedule changes by the airlines. The contours are used to determine compatible land uses around the airport.”*

Noise is evaluated in such an extremely limited context with the FAA INM Model Version 7.0. The methodology for this model dates to 1978 and has not changed it is a modeling of noise averaged or aircraft type and size as well as averaged over a 24 hour period. This is such an archaic method of noise evaluation and for the only seemingly apparent outcome to dumb down the outcome and show lesser noise than actually is. Keep in mind computers and modeling were primitive back in 1978 and the INM took in consideration a flat plane projection not considering the rise in elevation from Mean Sea Level. For Example El Dorado Hills rises on average 400 – 1200ft above MSL.

**SACRAMENTO COUNTY 2030 GENERAL PLAN page 5-5**

All effected Local Agency General Plans should be included for project analysis and alternative considerations. An airport is not a localized impact to a roughly 3 mile radius around the airport as defined in the CLUP study area. The project proponent fails to analyze and address adequately the significant and irrevocable effects on City of Folsom and a more rural county 12 NM from runway 22L, El Dorado County where not only 65 CNEL levels have been reached but because of the rise in elevation from Mean Sea Level , MSL and as

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well as noise compounded by a valley that resonates and magnifies the sound especially in winter during cloud cover. The Department of Transportation in March of 2005 emphasized the significant noise impact this project would impart to the Western Slope of El Dorado County.

<sup>1</sup> California Department of Transportation Division of Aeronautics to El Dorado County Local Area Formation Commission (LAFCO) regarding DEIR SCH# 2004082113, March 18, 2005.

**COMMUNITY PLANS page 5-5**

Why were other Community Plans that are under the flight paths and directly impacted by this project not included? What was the methodology for negating the impacts to all these communities under the low approaching flight paths? With historical input from City of Folsom, El Dorado County and other outlying communities under the flight paths why were these community plans not included in good faith. Newspaper articles from 2001 and 2002 show a high resident complaints and active involvement for a solution of over flight noise. There is a historic paper trail of significant involvement from El Dorado County residents that are affected by the project. What input was El Dorado County ALUC afforded on this project?

**THRESHOLDS OF SIGNIFICANCE page 5-12**

***“Impacts to land uses are significant if the project would:***

***Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the General Plan, Specific Plan, or Zoning Ordinance) adopted to avoid or mitigate an environmental effect.”***

The project fails to recognize and address impacts to a large area of El Dorado County affected by impacts associated with the frequency and elevations of over flights. Draft EIR fails to recognize an agency that does not have jurisdiction over the project but that suffers direct losses and impacts as historically documented since 1995/1996. Comments from residents of El Dorado County were submitted in the CLUP dated 1996 as noticing Sacramento County of potential significant impacts.

The EIR failed to consider the possibility that cargo air operations will be much greater than the FAA forecast of 1.5% annual growth and that sleep disturbance would be far greater under these realistic scenarios. Growth, after all, is the County’s expressed intent. “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 6/24/98.*

“Conveniently located between the Pacific Rim and Europe the County operates Mather as a cargo aviation facility with a goal of making it into a premier cargo hub. . .The goals for air

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cargo include the continued expansion of cargo operations at Mather airport including cargo shipments to and from Asia.” *Chery Marcell, Director of Marketing and Public Relations, Sacramento County Airport System, 8/24/05.*

**Specifically:**

- The EIR failed to consider that Mather could become a large cargo hub – a point for transshipment of freight to distant cities. Here is a sobering quote from the July 2008 *SACOG Regional Goods Movement Study*. “Forecasting future levels of air cargo at SMF [Sacramento International] and MHR [Mather] is problematic. . . The operating strategies of those carriers are dictated by . . . their need to move air cargo through complex national and international transportation networks where timing is critical. Much of the air cargo handled at the two airports is being transferred between aircraft, not starting or ending its trip in the SACOG region. The selection of SMF or MHR as a “hub” for one or more carriers is based on the airport’s location within the carrier’s network, not on local cargo business. What the air carriers regard as optimal routing patterns can and do change, sometimes abruptly, and for reasons which are often opaque to an outside observer”.
- The EIR failed to consider that FedEx could move its operations from Sacramento International to Mather on very short notice. Here are comments from County officials (as quoted in *Comstock’s Business*, 8/2004, p 59-61): “As a public airport that received federal funds, we cannot force all our cargo operations to relocate to Mather. We make Mather appealing by favorable lease rates and other means.”. . . As for Federal Express and its operation at Sacramento International, “We’re talking to them and we believe they will move.”
- The EIR failed to consider that UPS could move a portion of its Ontario, CA operations to Mather. Quoting again from the *Comstock’s* article, “Right now, the UPS mini hub is in Ontario, down near Los Angeles. We’re basically talking to UPS about a better airport, with less congestion.” (Note: there is no way Mather can be a better airport than Ontario without extending Runway 4R/22L to make a second cargo runway.)
- The EIR failed to consider that “The fast-growing China market could become a huge new source of growth for international cargo business at Mather Airport.” *Sacramento Business J. “Study sees China as a huge boost to Mather,” 4/15/05.*
- The Sacramento County Board of Supervisors was concerned enough about greater traffic levels that on April 19, 2006, they voted to include the “theoretic operational capacity’ in the environmental studies for land use planning and for the draft Mather

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Airport Master Plan. The “theoretic capacity” was defined in a paper by Leigh Fisher Associates entitled, “*Mather Air Cargo Operations Capability*.” It is the maximum number of operations that can be accommodated at the build-out of planned landside facilities. Leigh Fisher found that Mather could accommodate an annual average of 70 daily cargo operations, or 25,550 operations annually vs. 6,534 cargo operations for the year 2025 used in the EIR. Apparently, the Supervisors’ direction was not followed. Further, the Leigh Fisher study did not consider cargo facilities that could be located on the almost 300 additional acres reserved for landside facilities. It should also be noted the annual service volume (defined by FAA as a reasonable estimate of the total number of operations the airport can accommodate) for Mather is 300,000 operations annually – much, much greater than the theoretic capacity.

**IMPACT: CUMULATIVE CONDITIONS page 5-16**

***“All of these future projects are located outside of the airport planning areas and associated CLUP contours. Any new development and land uses will not be significantly affected. Cumulative land use impacts are less than significant”***

The project fails to consider impacts outside a very small limited and unreasonable 3 mile radius defined as the CLUP study area and grossly underestimates the impacts of over flights on approach over these project areas. The Draft EIR states all of these future projects for east Sacramento County, Rancho Cordova and Folsom area are located outside of the airport planning areas and associated CLUP contours. The DEIR states any new development and land uses will not be significantly affected and that cumulative land use impacts are *less than significant*. The Planning Area is being grossly distorted to nullify cumulative land use impacts due to future fly overs on approach to the airport at low elevations of 800 – 2000 ft. These elevations have been documented by SCAS and are a record of the flight track database.

**SIGNIFICANCE CRITERIA page 6-4**

***“A project will have a significant impact on visual resources (aesthetics) if:***

- 1. It conflicts with the visual quality policies of the Sacramento County General Plan Land Use Element.***
- 2. It creates a strong visual contrast with the existing visual setting and substantially reduces existing scenic quality, as seen from any high sensitivity foreground or middle-ground viewpoint.***
- 3. It substantially alters existing views from locations or facilities noted for their scenic value such as scenic highways, corridors, or vistas.***
- 4. It creates a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day- or nighttime views in the area.”***



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The DEIR fails to demonstrate the project will not have significant impacts of visual resources. Aesthetics, Noise and Air Quality are highest on the list of environmental impacts to areas under the flight approaches and departures. The El Dorado County western slope that Sacramento County Department of Airports has put directly under approach and departure paths is known nationally for its rural beauty and scenic quality. Heading east on U.S. Highway 50 from the Sacramento Valley toward the Sierra Nevada Mountains you see a transition in the landscape as you cross the El Dorado County line. An abrupt elevation change into rolling hills and oak trees signals you're above the valley as you enter El Dorado Hills and beyond traversing a few miles further you begin to reach the beginning of the timberline with a mix of scrub pine and larger sequoia that signals you're at the base of the Sierra Nevada. A place with great history almost all of us Californian's have a connection to as it was the beginning of the gold rush and where many of our fore fathers came or many of our fore fathers planted the desire for us to come to such a unique and significant area rich in culture and resources. It would be such a shame and such a loss to not only California but the nation to have the foothills of the Sierra Nevada's over run by jet approaches to a Cargo Hub that stands to benefit economically the Pacific Rim and mostly Asia as the dollars would pass through and not be the end source for Sacramento County. The Gateway to the Sierra's would become the Inglewood of Northern California. Sure Sacramento would receive some monetary reimbursement but not nearly enough to offset the costs of infrastructure, operation and maintenance. The costs California's would pay in the loss of historical scenic landscape and history as well as a huge wine industry acclaimed globally for its wines and tourist industry is more than I think Sacramento County recognizes. As Californian's with grapes as one of the main agricultural industries statewide most all of us know someone, are related to someone or are effected by some economical outcome of the grape industry either directly or indirectly. To have flights on approach decent every 4 minutes at build out would be devastating to El Dorado County and to California. Does Sacramento County really want this economic and quality of life loss that is so closely related to their economy. I highly recommend a Governor appointed task force at this juncture to look at the effects of how this project would reverberate State wide and potentially nationwide. The Draft EIR fails to recognize the consequences of air quality that the foothills already struggle with as a product of our geographic and meteorological relationship. It is well documented how bad the air quality in the foothills and Sacramento Valley is by virtue of the abrupt change in elevation from the valley floor as well as the Bay Area jet streams and inland breeze pattern that locks the air against the foothills for months at a time. Contaminants coagulate and reach toxic levels hence the "spare the air" days. What does that mean on a human level? It means there are many days in the foothills that people suffer with respiratory pain and events of asthma. Children are the most susceptible and shockingly it seems one in two children here in the foothills suffer from some form of respiratory pain or symptoms. Combine that with the forest fires the air becomes unlivable, painfully unlivable. Sacramento County has knowledge and experience with this as they have implemented stringent air quality steps to tackle the problem but does Sacramento County realize that the problem is 10 fold in the foothills because the Delta Breezes and Bay Area's weather

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patterns push air up against the Sierra Nevada's and lock in the bad air quality because of the meteorological and geographical configurations. The Draft EIR fails to quantify the significant and unfortunate air quality configuration that is endemic to this region and more so fails to represent the cumulative effects the significant increase in the levels of toxins and pollutants from jet exhaust would disperse and magnify already very poor conditions. This project did not meet Air Resources Board project requirements and no discussion was submitted in the Draft EIR. Please recirculate and explain the omission.

**Public Services 7-1**

The discussion on electric and natural gas services is wholly inadequate (DEIR p.7-1). It provides no information as to the available infrastructure to the site, the existing demands on that infrastructure, or the demand that would be created by the project. Without that information, how can the DEIR preparers make a determination of a less than significant impact? The project has the potential to increase demand for these services to such an extent as to require new or expanded facilities that could themselves result in significant physical environmental effects. The EIR needs to be recirculated to provide this analysis.

The DEIR acknowledges that "planned landside improvements (i.e. increased cargo hangers, commercial/office buildings and airport facilities) would incrementally increase the demand of emergency services" (p. 7-2), but concludes that because Sacramento Metropolitan Fire District did not provide any comments to include in the document, that the impacts are expected (emphasis added) to be less than significant. The EIR cannot rely on failure of the agency to provide a statement that the impact could be significant to determine that the impact is not significant. The finding in the EIR needs to be based on substantial evidence in the record. This is not provided in the EIR.

The analysis of wastewater service is entirely inadequate. Like the discussion of energy, the DEIR contains no information of existing demand, the capacity of the existing wastewater conveyance and treatment, and no estimates of demand from the project. Without this information, the EIR cannot conclude that the project would not result in significant effects related to increased demand for wastewater infrastructure. The project demand must be disclosed and used to determine whether there would be upgrades to the system that would result in significant physical environmental effects.

The DEIR (p. 7-4) seems to acknowledge that the project would result in exportation of soil from the site during construction. How much soil would be exported? Where would it be transported (how far?) and if it is not needed on other construction projects, where will it be disposed? Were emissions associated with the off-hauling of soil assumed in the Air Quality section of the EIR? What is the contamination content of the soil? The EIR also does not disclose the amount of construction debris that would be generated, how much would end up sent to a landfill(s), which

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landfills would be used, and the capacity of those landfills. The EIR needs to consider these facts for an adequate analysis.

**INM MODEL OVERVIEW page 9-8**

*“The following sections describe the model, its limitations, and the inputs required for analyzing aircraft noise. The INM has been the FAA's standard tool for determining the predicted noise impact in the vicinity of airports since 1978, and recognized by the State of California.”*

The use of the INM Model to predict noise impact is a fatal flaw of this project. Significant Land Use changes and widespread urbanization extending out beyond city core centers that expands the sphere of influence of projects requires impacts to be adequately addressed more than 3 miles from a runway specifically in the case of an adjoining County within 8-9 nautical miles from the project boundary and rising in terrain directly under approach and departure paths. The INM is an outdated approach to deal with noise issues. Although Modeling is used in the Transportation Field as a way to analyze parameters it is never the sole source to base project approvals or acceptance of noise on as it is often conceptual and based on non-tested assumptions.

**9 NOISE page**

It is interesting to note that the noise section looks different from all the others in the DEIR: it doesn't have significance conclusions in it. The EIR does have, however, in Summary section 16, that noise is a less than significant impact, with only a page long discussion of it being an area of controversy. The DEIR provides no regulatory setting upon which impacts can be determined. The DEIR provides only assumptions about the potential for awakenings (based upon unverifiable data and methods, see below), and then concludes that this is less than significant without describing the level at which impacts would be considered significant. Therefore, the conclusions in the noise “analysis” are apparently based upon nothing but the impressions of the EIR authors. What number of awakenings would be considered significant?

The noise section is an example of how failing to provide a quantitative discussion of operational aspects of the project results in a flawed analysis. As noted above, the annual service volume for Mather is 300,000 operations annually; the noise discussion assumes only 110,634 annual flights (Table NS-28, p. 9-59). Without a defined operations plan that includes controls to limit flights to within the numbers assumed for the noise analysis, the noise impacts would far exceed that disclosed in the EIR. If the assumption for 110,634 annual flights is considered accurate, the project description must include a maximum number of flights allowed and include some mechanism to monitor and regulate the operations to not exceed this number. Without this, the EIR contains a fundamental flaw, as it grossly underestimates the potential operations and associated impacts. Further, it defies logic that the County would pursue the proposed

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improvements at Mather, with the accompanying impacts and enormous cost, to allow for an increase in operations of 201.95 flights per day (Table NS-6, p. 9-24) to only 256.57 flights per day (Table NS-31, p. 9-62), a 25 percent increase in operations. It appears the physical improvements are more geared toward an increase of 300,000 flights per year. This is what should be analyzed in the EIR and with these more realistic assumptions, there would certainly be significant impacts identified for the project.

Table NS-28 (p. 9-59) states there would be 303.11 total flights per day, but the analysis in the DEIR considers only 256.57 total flights per day because a “touch and go” is considered one operation. How can this be? By counting this as one operation, this analysis underestimates the noise levels at each end of the runways. Because each touch and go will result in noise increases at each end of the runway, a touch and go should be analyzed similar to one touchdown and one take off.

The EIR states that the Master Plan project is considered to have a significant noise impact if it would (DEIR p. 9-20):

1. Expose noise-sensitive areas included in the CNEL 65 dB contour to a projected increase of 1.5 dBA or more when compared to the existing condition
2. Increase the number of people that would be included in the CNEL 65 dB contour as a result of the proposed action
3. Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
4. Expose persons to or generation of excessive ground born vibration or ground born noise levels
5. Result in a substantial permanent increase in ambient noise levels above levels existing without the project
6. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project
7. Expose people residing or working in the project area to excessive noise levels.

Regarding criteria 1, upon what is the 1.5 dB increase determined to be significant. Regarding criteria 3, the DEIR does not take into consideration the standards of other affected jurisdictions. Regarding criteria 6, the DEIR acknowledges that increased operations at Mather would result in noise conditions along the flight paths that would result in awakenings of residents that would increase by 10% in some areas but fails to acknowledge this as a significant temporary increase in noise levels. Regarding the potential for these temporary increases to be determined significant, the Berkeley Jets case states the following: “Given the uniqueness of the CEQA standard, the fact that residential uses are considered compatible with a noise level of 65 decibels for purposes of land use planning is not determinative in setting a threshold of significance under CEQA. For example, in *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225

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Cal.App.3d 872 [274 Cal.Rptr. 720], the court ruled that citizens' personal observations about the significance of noise impacts on their community constituted substantial evidence that the impact may be significant and should be assessed in an EIR, even though the noise levels did not exceed general planning standards. (Id. at pp. 881-882.)" Thus, the citizens' observations in this case constitute substantial evidence of a significant impact and their lack of a threshold does not justify a less than significant finding. Jets also includes the following: "...noise increases of several decibels may also be significant in quieter environments (ones below DNL 60)" so the 36 and 41 db Leq in unincorporated areas in El Dorado County would be significantly affected by the single event noise associated with a nighttime flyover. Thus, the noise section of the EIR is not a true representation of the potential impacts of noise.

Page 6-3 of the EIR identifies the following as sensitive receptors as it relates to light, but these are not addressed as potentially affected by noise that would be generated by a ten-fold increase in flights:

Areas and facilities potentially sensitive to new light emissions within the vicinity of Mather Airport include:

- ☐ Residential and open space/recreational areas approximately 0.3 miles north of Runway 22L.
- ☐ A small residential area approximately 1.3 miles east of Runway 22L.
- ☐ A residential area approximately 0.3 miles south of the airfield and abutting the airport/Industrial Area along Aubergine Way.
- ☐ Small scattered residential areas along Happy Lane generally west from the intersection of Spaatz Way and Missile Way.

The DEIR uses makes assumptions about typical reduction from noise with closed and open windows, but provides no source for this information. A "Noise Level Reduction (NLR) value of 15 dB for windows open was assumed in the DEIR. Typical NLR values for windows closed ranges from 20-25dB" (p. 9-110). The DEIR failed to consider that not all residences are new construction: the DEIR must take into consideration that some of the residences are older construction and would not achieve that level of exterior-to-interior noise reduction. Thus, the DEIR overstates the closed-window reduction that would be achieved at many residences in the study area. In addition, while a closed window assumption may hold true for a school, many residences, especially those in rural areas where the ambient noise is much lower, would have their windows open at night. With regard to a 15-dB reduction with open windows, where is the empirical data that shows this is an accurate assumption? It seems to be based on some reduced version of the closed-window 20-25 dB reduction, but without a verifiable source for this data, it seems only based upon wishful thinking of the EIR preparer. The EIR must provide a standard of significance to determine the number of awakenings would be considered significant, provide modeling with a verifiable assumption for reductions that would occur with open windows, and

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make a significance conclusion based on that. The EIR should also consider that some residents will close their windows at night to reduce their noise exposure, which would cause them to use air conditioning at night when they otherwise would not. The EIR should consider the additional energy demand and corresponding air emissions and greenhouse gas emissions associated with this increased air conditioning use.

It looks like all the EIR does is to disclose the potential for some awakenings, and finds it less than significant (only in the summary section). It makes no attempt to compare noise levels that would be generated by the project with adopted standards of any of the affected communities (e.g. City of Folsom, El Dorado County). While it provides some information about the potential for awakenings, it does not disclose any single-event noise levels, only CNEL for "community" and "aircraft". What are the SEL at the noise monitoring locations? The DEIR seems to rely on the FAA's Integrated Noise Model (which the EIR only refers to as INM and never defines the term); however, the FAA is not a lead agency in this action. Why were the standards of Sacramento County (CEQA Lead Agency), the City of Rancho Cordova, City of Folsom, and El Dorado County not considered?

The DEIR states: "For arrivals, a three-degree descent that is typical for most flights is assumed in the INM." However, once cleared for a visual approach by approach control, flight crews have no requirement to maintain a 3 degree descent to the runway until reaching approximately 4 miles (1200' above ground) from touchdown. With over 90% approaches being conducted as a visual, and a "three-degree" model being assumed in the INM, this does not represent an accurate assessment of transport aircraft tracking only the lateral component (localizer) of the ILS for runway 22L. With a CNEL 65 being an acceptable standard over residential areas, the location of noise monitor for site #13 at Oak Ridge High School, does not reflect an effective data point due to its valley location and ridge line blanking effect, it also does not depict an accurate reading for the residential development at higher elevations of the surrounding area. Site #7 at 11 nautical miles represents an even greater prospect for exceeding CNEL 65. When cleared for a visual approaches, aircraft based on their inbound location are typically given headings to intercept the final approach anywhere from 4 and up to 35 nautical miles, but more typically 4-10 miles. This puts Site #7 just outside of a turning point for a visual approach where the aircraft is configuring for flaps and landing gear, necessitating higher thrust settings. Again, more than likely at that point below the three degree flight path. The DEIR contains no charted visual approaches for noise mitigation.

At what altitude are the planes when the noise monitoring occurred? What would be the lowest altitude over flight that would occur with the project and what would the noise levels from such flights be? How does this compare to applicable standards in affected jurisdictions? What would the potential for awakenings be under these conditions?

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Table NS-50 (p. 9-118) is a bit deceptive: CEQA requires that the Lead Agency compare existing conditions with the conditions under the proposed project. Therefore, the numbers in the center column of that table are the ones upon which to base a conclusion, not the column to the right which compares a 2025 without project and 2025 with project.

Based on the standards in the EIR, the EIR needs to be recirculated to objectively discuss these criteria, including a criterion for what would be a reasonable standard for awakenings, based upon scientific data. It should be noted that criteria c) does not have to be based upon any jurisdiction's noise standards but can be applied qualitatively.

In addition, as noted above, areas in El Dorado County currently experience low ambient noise levels, so the single events are substantially more disruptive than in environments with higher ambient noise levels. Therefore, this should be considered a significant impact and the County needs to impose mitigation measures to reduce noise impacts (CEQA Guidelines 15126.4) and discuss alternatives to the project that would reduce noise (CEQA Guidelines 15126.6(b)).

DEIR p. 12-17 states, "the Project will generate 86,912 vehicle miles traveled per day

Overall, the noise "analysis" is fundamentally flawed: there are no predetermined standards upon which to base a conclusion of significance; the assumptions for the analysis are not based on established facts with regard to exterior-to-interior noise reductions for older homes and windows closed/open conditions; the EIR does not properly consider noise levels at properties adjacent to the airport, including residential areas within 0.3 miles of the airstrip expansions. With appropriate assumptions, standards of significance, and objective analysis of the facts, the impacts of the project would clearly be determined significant and mitigation would need to be developed and implemented prior to any increase at Mather. This information, especially a mitigation plan, needs to be included in the recirculated EIR.

1. The first step in the process of identifying a problem is to define the problem. This involves identifying the symptoms of the problem and determining the scope of the problem. Once the problem has been defined, the next step is to identify the causes of the problem. This involves identifying the factors that are contributing to the problem and determining the underlying causes of the problem. Once the causes of the problem have been identified, the next step is to develop a plan to address the problem. This involves identifying the actions that need to be taken to address the problem and determining the resources that will be needed to implement the plan. Once a plan has been developed, the next step is to implement the plan. This involves taking the actions that have been identified in the plan and ensuring that the resources are available to implement the plan. Finally, the last step in the process is to evaluate the results of the plan. This involves determining whether the plan has been successful in addressing the problem and identifying any areas for improvement.

2. The second step in the process of identifying a problem is to identify the causes of the problem. This involves identifying the factors that are contributing to the problem and determining the underlying causes of the problem. Once the causes of the problem have been identified, the next step is to develop a plan to address the problem. This involves identifying the actions that need to be taken to address the problem and determining the resources that will be needed to implement the plan. Once a plan has been developed, the next step is to implement the plan. This involves taking the actions that have been identified in the plan and ensuring that the resources are available to implement the plan. Finally, the last step in the process is to evaluate the results of the plan. This involves determining whether the plan has been successful in addressing the problem and identifying any areas for improvement.

3. The third step in the process of identifying a problem is to develop a plan to address the problem. This involves identifying the actions that need to be taken to address the problem and determining the resources that will be needed to implement the plan. Once a plan has been developed, the next step is to implement the plan. This involves taking the actions that have been identified in the plan and ensuring that the resources are available to implement the plan. Finally, the last step in the process is to evaluate the results of the plan. This involves determining whether the plan has been successful in addressing the problem and identifying any areas for improvement.

4. The fourth step in the process of identifying a problem is to implement the plan. This involves taking the actions that have been identified in the plan and ensuring that the resources are available to implement the plan. Finally, the last step in the process is to evaluate the results of the plan. This involves determining whether the plan has been successful in addressing the problem and identifying any areas for improvement.

5. The fifth step in the process of identifying a problem is to evaluate the results of the plan. This involves determining whether the plan has been successful in addressing the problem and identifying any areas for improvement.

6. The sixth step in the process of identifying a problem is to identify the causes of the problem. This involves identifying the factors that are contributing to the problem and determining the underlying causes of the problem. Once the causes of the problem have been identified, the next step is to develop a plan to address the problem. This involves identifying the actions that need to be taken to address the problem and determining the resources that will be needed to implement the plan. Once a plan has been developed, the next step is to implement the plan. This involves taking the actions that have been identified in the plan and ensuring that the resources are available to implement the plan. Finally, the last step in the process is to evaluate the results of the plan. This involves determining whether the plan has been successful in addressing the problem and identifying any areas for improvement.