



May 6, 2014

Marianne Biner  
Sacramento County Senior Environmental Analyst  
Division of Environmental Review and Assessment  
827 7th Street  
Sacramento, CA 95814

Dear Ms. Biner,

Our neighborhood, Green Springs Ranch, is located in El Dorado County directly under the approach path to Mather Field. Many of our residents are concerned about the likely increase in air traffic and the threat that would pose to our rural environment. After reviewing the revised Draft EIR for Mather Airport Master Plan, we find it to be wholly inadequate. Below is a list of our comments on the DEIR.

1. The analysis of project vs. no project alternatives with respect to noise, traffic, air quality, etc. is flawed because the air traffic projections are provably incorrect. Under the no project alternative, UPS has stated that it will relocate cargo operations to Sacramento International airport. The no project alternative must show a decrease in cargo operations, not an increase. Conversely, the project scenario must show a larger increase in cargo operations since UPS has indicated they will move additional cargo operations to Mather if the project is built. Thus, the relative impact of the project scenario will be greater than stated in nearly all aspects (traffic, noise, air quality, etc.). The DEIR must be updated taking into account realistic project and no-project flight numbers based on the stated intentions of cargo carriers including UPS.
2. **Alternatives:** The DEIR section looking at "Use of Another Airport" (page 4-14) is flawed. The DEIR makes the point that SCAS has designated SMF as a commercial airport and therefore the use of SMF for cargo "would not meet project objectives." This is absurd since SCAS has the ability and authority to allow cargo flights into SMF. In fact, there are many cargo carriers flying into SMF today (as documented on the SMF website), including American Airlines Cargo, Delta Airlines Cargo, Federal Express Cargo, Southwest Airlines Cargo, U.S. Postal Service-Express Mail, and Alaska Airlines/Horizon Airlines Cargo. The DEIR must be updated to include SMF as a reasonable alternative for cargo flights.
3. **Land Use Conflict:** On page 4-14, the DEIR states that "potentially significant land use conflict would not be avoided by using another airport (i.e. SMF) for cargo operations." It continues to state that since military training operations would continue, additional cargo operations would have no impact. This logic is flawed since the military operations predominantly occur during daylight hours. This is far less disruptive to residents than

nighttime and early morning cargo flights. The DEIR must be updated to comprehend the fact that land use conflict can be reduced by moving cargo operations to SMF since under the project scenario, there will be an increase in nighttime and early morning flights, whereas the existing military traffic is predominantly a daytime activity.

4. **Noise measurement:** Site ID 2 (2280 Ethel Drive, Rescue, CA) is in our neighborhood, Green Springs Ranch. The DEIR states that noise monitoring was done for “about 48 hours at each site” and observation only for 4 hours at each site. There is no mention of any dates in this study. These could have been weekends (when air traffic is lower) and there is no mention of temperature which has a large impact on the way in which sound travels. Additionally, measurements were made at a point directly under the flight path. These measurements are made improperly since incoming aircraft frequently deviate from the designated flight path and the resulting measurement would be too low. The DEIR needs to be updated with a new study measuring aircraft noise in a more systematic way, over a longer period of time, with longer direct observation, and taking into account the *actual* position of the aircraft with respect to the sound measuring devices and not just theoretical flight path.
5. **Noise Impact:** although CEQA does not specify specific values for significance of a noise, it does list several "tests" for significance, including "Would the project result in: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing levels existing without the project?" Clearly the answer to this question is "yes" in the case of the proposed project. The calculation of "nighttime awakenings" is flawed due to the improper noise measurement (see 4. above). Additionally, this calculation ignores people under the age of 18, and fails to mention that these awakenings will occur any time an aircraft flies over. The DEIR needs to be updated to determine nighttime awakenings using: 1) proper noise measurement methodology, 2) Take into account multiple awakenings per night, 3) Add in the population under 18 years of age who may be potentially awakened, and 4) Utilize a more realistic projection of project and no project air traffic counts.
6. **Economic Impact.** The DEIR fails to analyze the negative economic impact to home values near the flight path of Mather Airport. The adverse impact to property values of having air traffic noise is well documented. Many people will not purchase a home in an airport flight path at any price. The ILS approach path is directly over thousands of homes in eastern Sacramento county and western El Dorado county. The negative impact to property values (and the resulting tax revenues to the counties) is potentially enormous. The DEIR must be updated to analyze the economic impact to homeowners, the resulting loss in property taxes to the affected cities and counties, and the potential cost to Sacramento County for potential litigation expenses.

Based upon the numerous adverse environmental and economic impacts that this project, if approved, would have upon the residents of western El Dorado County, we urge the board to reject the revised Draft EIR and the Mather Airport Master Plan project.

Green Springs Ranch Landowner's Association

Don Van Dyke  
HOA Board President