



THE MATHER NEIGHBORHOOD ALLIANCE

June 12, 2015

County of Sacramento
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814

Attn: Kevin Messerschmitt, Associate Environmental Analyst
messerschmittk@saccounty.net
cc: DERA@saccounty.net
Supervisor Don Nottoli, nottolid@saccounty.net

Re: Comments on the Mather Field Project Draft Environmental Impact Report (DEIR)
Control Number: PLNP2013-00044
State Clearinghouse Number: 2013072073

Dear Mr. Messerschmitt, DERA, Sacramento County Staff,

The Mather Neighborhood Alliance (the Alliance) developed the following comments to address deficiencies found in the Mather Field Project Draft Environmental Impact Report (DEIR) to amend proposed land use designations, land use boundaries, and transportation alignments in the Mather Field General Plan, Mather Field Specific Plan, Mather Field Specific Plan Amendment, and General Plan Transportation Diagram.

The Alliance

The Mather Neighborhood Alliance currently represents over 100 Mather residents. We expect this number will grow substantially as the Alliance core team creates awareness of the specifics of the project proponent's plans through public outreach. The Alliance includes Mather residents who are experts in geology, ecology, civil engineering, media and publicity, environmental and contract law, and many other disciplines. We expect to recruit more experts who share an interest in protecting the natural resources at Mather for the benefit of our County as a whole. As the Alliance grows and new information comes to light, we expect to continue to share comments and feedback to County and Federal agencies.

Draft EIR Comments

The Alliance submits this letter as a comprehensive set of our collective concerns about the DEIR related to the proposed boundary and land use designation changes of the Mather Field General Plan, Mather Field Specific Plan, and General Plan Transportation Diagram as well as a project proposal to extend Zinfandel drive and a trunk sewer line into the southern portion of the project area. The Alliance offers the following comments and suggestions in an effort to move forward on a path that avoids costly litigation and negative publicity. We request that County Planning and Environmental Review and Transportation staff continue their engagement with Mather residents to create revised development plans which better reflect the community character of Mather Field (south of the airport) and more effectively optimize the existing environmental, educational, and aesthetic assets therein.





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Recognizing that this DEIR covers all of Mather Field, the Alliance restricted its comments primarily to the following proposed land use changes and developments:

- Realignment of Zinfandel Road
- Establishment of a sewer trunk along Zinfandel Road
- Establishment of the Urban Development Area boundary in the eastern portion of Mather
- Establishment of a Public Quasi Public boundary in the eastern portion of Mather
- Establishment of a Commercial Recreation District in the eastern portion of Mather

In addition to comments on DEIR impact identification deficiencies, the Alliance would like the County to address the following text from page 7-78 of the DEIR regarding compensation for direct impacts to and loss of vernal pool acreage:

“To meet the partial preservation requirements of direct fill resulting from the proposed project, an easement (acceptable to USACE and USFWS) shall be recorded over the Mather Preserve and proposed Riparian Corridor. Onsite preservation of habitat capable of supporting vernal pool species within the Preserve and Riparian Corridor shall total **no less than 68.88 acres.”**

To the Alliance, this appears to be double-dipping the value of the planned Mather Vernal Pool Preserve to give the developer (the Lewis Group, AKA Mather South, LLC) a free pass on vernal pool mitigation. For example, if any developer in Sacramento County proposed to fill 36 acres of vernal pools, that developer would be required to preserve 72 acres of vernal pools and create 36 acres of vernal pools for mitigation (i.e., compensation). At a cost of more than \$150,000 per acre (perhaps as much as \$200,000 per acre, which is a rough price estimate from vernal pool mitigation banks) this would cost a developer more than \$16 million. From our perspective, using vernal pools in the Mather Preserve (which are already required to be protected by agreement with the U.S. Department of Defense) as a mitigation resource is an unethical and fiscally irresponsible use of a public asset. Such an action suggests that the County Department of Community Development is showing exceptional and unwarranted favoritism to the developer.

Land Use

The DEIR's insufficient Coverage of Possible Impacts from Zinfandel Re-alignment and New Sewer Trunk

The DEIR project description (pg. 2-1) explains the purpose of the proposed Zinfandel/sewer trunk extension is “to provide improved access and sewer service to the central portion of the project site.” The DEIR goes on to explain “the intent of the project is to provide for new development and economic opportunities within the County and to provide services for County residents and visitors.” Currently no residents or visitors require service at the terminus of this proposed extension (approximately 2,100 feet south of Woodring Drive). It is clear that this proposed extension is intended to provide infrastructural improvements for residential and commercial development in the Mather South Project area, the impacts of which were specifically excluded from consideration in this DEIR.





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It appears then that County staff is deliberately attempting to circumvent CEQA guidelines requiring a full accounting of all potential environmental impacts within the project area and avoid the scrutiny of a comprehensive EIR and the requisite studies that would entail. The County would not go to the trouble and expense of constructing a 4-lane road and trunk sewer line out into an empty field unless it already had approved projects to connect it to. Since those projects have not yet been approved and full scope of impacts they might impose has not been determined, we contend that the conclusions drawn in this DEIR are not valid and have not been adequately assessed.

Recommendations

The Zinfandel Drive / trunk sewer line extension is obviously intended to serve the Mather South Project. Thus this DEIR should *either* consider all of the ramifications that project will have on the Mather region as a whole, *or* the proposed construction on Zinfandel should be postponed and reconsidered as part of the Mather South Project EIR.

The DEIR's insufficient Coverage of Possible Impacts from Proposed Changes to Mather Field General Plan Land Use Designations, Mather Field Specific Plan Land Use Designations, and Mather Field Specific Plan Amendment

We disagree with the County's attempt to adopt a programmatic approach (pg. 2-16, DEIR) to the environmental analysis for land use designations. We view this as an intentional effort to dissect environmental impacts associated with development on the South Mather Project from those related to the broader land use designation entitlements requested for the Mather Field and to disguise the true extent of environmental impacts to the Mather Field region *as a whole*. The DEIR states multiple times that **". . . the future amount of construction activity that could occur consistent with the project proposal is unknown..."** yet it assumes that mitigation measures will somehow compensate for losses such that impacts are "less than significant."

We believe this approach reflects a willful effort to skirt CEQA regulations and guidelines by subdividing environmental impacts into narrowly defined land use areas with (as yet) unspecified development plans that may have broader consequences to the full Mather ecosystem. Regardless of the legality of this tactic, we regard it as an *unethical* attempt to circumvent the spirit of CEQA regulations and a violation of the public trust. Consequently, we conclude that the environmental impact findings of "less than significant" and "less than significant with mitigation" presented in the DEIR for the Mather Field Project are NOT valid on the basis that they do not adequately or accurately assess the full extent of potential environmental impacts created by the proposed changes in land use designations.

As stated in the DEIR, the first strategy listed under the County General Plan Land Use Element has the intended goal to "Direct new growth to previously urbanized areas, planned growth areas and strategically located new growth areas to promote efficient use of land, to reduce urban sprawl and its impacts, to preserve valuable environmental resources, and to protect agricultural and rangeland operations." The Mather Field DEIR fails to address this.





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Urban Development Area

Designating a large undeveloped tract of land surrounded by other large undeveloped tracts of land as an Urban Development Area also sets a terrible precedent, effectively undermining the value and potential use of this area as an environmental resource. We are concerned that regardless of the outcome of future EIRs and Master Planning studies, any land designated as Urban Development Area within Sacramento County will permanently be recognized as being suitable ONLY for urban development applications. Once given this designation, these types of properties will no longer be recognized as having any environmental value to the surrounding community, thus making it considerably more difficult to argue for their preservation.

We specifically object to use of the Urban Development Area land use designation as a “holding” designation that “only identifies where future development may occur and does not allow for any development.” We also oppose the proposal to amend language in the Sacramento County General Plan related to the Urban Development Area designation.

We also object to the implied assertion that all of the land in this proposed area qualifies as “disturbed” or that the wetlands therein are not suitable for preservation. We regard this as a purposely inaccurate characterization intended to dismiss the importance of these lands to the overall health and well-being of the Mather ecosystem. The County’s Urban Development Area designation is founded on incorrect assumptions and incomplete consideration specific wetland habitats within the proposed UDA boundary. The Alliance rejects County staff’s characterization that all lands (and associated wetland habitats) adjacent to the Folsom South Canal are “highly disturbed” and their contention that the best use is for Urban Development Area (UDA), Commercial Recreation District (REC), and Public Quasi Public (PQP).

The County’s DEIR fails to acknowledge that the vernal pool habitats and related wetlands at Mather Field are sustained by groundwater flow. In other words, these are not simple pools filled by rainfall or surface runoff that subsequently evaporate during the summer. Water flowing through these pools comes from groundwater trapped on top of a layer of impermeable soil just a few feet below the surface (known as a hardpan). This is a condition known as a “perched” aquifer. Groundwater within the perched aquifer is not just sitting still though. It flows laterally beneath the land surface and may “daylight” in areas where land surfaces (e.g. depressions and swales) lie below the elevation of the groundwater surface. Many vernal pools are connected to one another by this shallow groundwater flow and are sustained for weeks after the end of the rainy season by groundwater flow from surrounding upland areas.

While it is true that some of this area was covered by excavation waste from the Folsom South Canal, there is a substantial portion that was not disturbed. Careful examination of aerial photography (available from the United States Geological Survey (USGS) and other sources) clearly shows the boundary between disturbed and undisturbed lands as evidenced by morphologic and biologic indicators. There is clear evidence of undisturbed grasslands, wetlands, and vernal pool habitats visible in these images, within the proposed UDA, REC, and PQP boundaries proposed in the DEIR. Wetlands in these undisturbed areas continue to maintain a high degree biologic function. One vernal pool in this area is known for having the greatest diversity of threatened and endangered invertebrate species anywhere in Mather (known as the Splash Critter Pool). Furthermore, wetlands in the disturbed and marginally disturbed areas in some locations have managed to partially recover and maintain a remarkable amount of functionality despite the damage done.





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More importantly, the spread of excavation waste from the Folsom South Canal did not disturb the perched aquifer beneath this disturbed land. Lateral movement of this perched groundwater beneath this site *continues to sustain the health of vernal pools in both disturbed and undisturbed areas*. We, therefore, reject claims (often stated as fact) by County staff that the entirety of this land has been irreparably disturbed and thus not suitable for preservation. Perched aquifers beneath disturbed areas may also be contributing (or even sustaining) groundwater flow to vernal pool habitats within the boundaries of proposed conservation lands. Any development immediately adjacent to a vernal pool preserve will have significant and unpredictable impacts.

Recommendations

The County must:

- Adopt a more flexible land use designation that does not stigmatize future land use exclusively for urban usage.
- Give greater consideration to the existing biologic and environmental diversity in these areas and their potential educational and environmental value.
- Complete a thorough study of groundwater flow within these areas and fully assess potential disruption that future development might create.

Once the County completes the actions outlined above, land use designations and boundaries can then be redrawn to be more compatible with existing resources and land uses.

Air Quality

Insufficient Coverage of Possible Impacts from Zinfandel Re-alignment and New Sewer Trunk

A traffic study has not been completed to determine what the air quality impacts caused by increased traffic flow might be. An increase of atmospheric nitrogen deposition caused by increased vehicle emissions will directly impact the vernal pools by changing their nutrient composition, making them more susceptible to invasive plant species. Without a complete assessment of future traffic flows, the County cannot adequately assess the extent of impact that associated changes in air quality might have the health of the preserve.

Recommendations

The County must complete a full accounting for traffic related impacts, for both short and long term traffic loads, on air quality along the Zinfandel alignment and propose realistic mitigation strategies for limiting impacts to vernal pool habitats nearby.

Insufficient Coverage of Possible Impacts from Proposed Changes to Mather Field General Plan Land Use Designations, Mather Field Specific Plan Land Use Designations, and Mather Field Specific Plan Amendment

The DEIR makes no mention of how the resulting change in land uses will impact air quality, which creates another important “unknown” factor.





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Recommendations

This DEIR presents far too many “unknowns” regarding the extent and degree of future developments across the Mather project area. It also does not consider any potential impacts from traffic loads associated with other projects further to the south. The County must complete a much more detailed accounting of estimated development extents and associated traffic loads before they can confidently establish a “less than significant” impact to air quality within the project limits as they apply to land use designations and boundaries.

Biological Resources

Insufficient Coverage of Possible Impacts from Zinfandel and New Sewer Trunk Extension

The DEIR does address shallow subsurface hydrology adjacent to the Zinfandel / sewer trunk extension and does not indicate that any studies have been conducted to determine how much of an area might be affected by disrupting groundwater flow along the alignment. The sewer trunk requires the digging of a trench up to at least 35 feet deep. This will undoubtedly affect shallow groundwater flow in nearby areas. Because vernal pool habitats (and the threatened and endangered species therein) at Mather Field are maintained by shallow groundwater flow, it is imperative to identify the patterns and extent of this subsurface flow before disrupting it with such a deep excavation.

Approving any phase of construction associated with the proposed Zinfandel Drive and trunk sewer extension without first completing a thorough multi-year hydrology study can lead to substantially greater environmental impacts to vernal pools in the preserve areas than have been assumed in this DEIR, or which can be successfully mitigated for. This would lead to CEQA violations and open the County and Mather South, LLC to lengthy litigation proceedings.

Recommendations

The County must complete a thorough study of groundwater flow within these areas and fully assess potential disruption that future development might create. Construction plans and mitigation strategies can then be reconsidered to address potential impacts and their relative significance.

One possible alternative would be to change proposed sewer trunk path to enter property at southeast corner (near intersection of Kiefer Blvd and Sunrise Blvd), and extend sewer trunk northward, aligning with the South Canal and eastern edge of the property; thereby increasing distance between disruption to subsurface hydrology and the preserve vernal pools dependent upon subsurface waters.

Insufficient Coverage of Possible Impacts from Proposed Zinfandel Alignment

We fervently believe that introduction of a 4 (possibly 6)-lane major traffic artery through the heart of Mather wildlands will irreparably damage the long term biologic viability, species diversity, ambient noise, and aesthetic value of the entire Mather ecosystem, in direct violation of CEQA guidelines. The DEIR has failed to consider any of these issues with respect to the proposed Zinfandel alignment.





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Among the more critical problems:

The County has not completed study of subsurface hydrology for the Mather Field Project. Without one, they cannot adequately assess the full range of potential impacts that road (and subsurface utility) construction might have on near-surface groundwater hydrology and associated long term health of vernal pool and wetland habitats sustained by this groundwater throughout the project area.

The County has not completed a traffic study for any alignment alternative. They have not published data to project the total number of vehicle trips, ambient noise generation, vehicle velocity, potential collisions with wildlife, vehicle emissions, etc., associated with the alignment and thus cannot draw any relevant conclusion regarding potential impacts or their relative significance. The DEIR also fails to consider or address any impacts that roadway development on this alignment might impose on the aesthetic value of surrounding land or land use.

Recommendations

We do not support the proposed amendment to the General Plan Transportation Diagram regarding the realignment of Zinfandel through the project and ask that the County reject this alignment in favor of one that is more complementary to land use and existing aesthetic within the project area.

One possible alternative is to realign Zinfandel to avoid some of the more sensitive pools and habitat altogether. We are providing this proposed alignment for your consideration as Figure 1: Alternative Alignment of Zinfandel.

If no viable alignment alternative can be found, we recommend (and prefer) that Zinfandel Drive not be expanded or extended through the project area. We believe that a major traffic artery of this sort is inconsistent with the existing character of the Mather community and would represent an extremely significant and unacceptable imposition on the landscape and on the adjacent habitat health and safety.

Insufficient Coverage of Possible Impacts from Proposed Changes to Mather Field General Plan Land Use Designations, Mather Field Specific Plan Land Use Designations, and Mather Field Specific Plan Amendment

One of the biggest issues identified in the Biological Resources section is the lack of consideration given to impacts on an ecosystem level. There is no recognition that impacts to one species or habitat can have profound secondary effects on other species, and eventually will degrade the entire ecosystem. The DEIR treats every species and habitat individually and does not consider the impacts how even minor impacts to one might affect some or all of the others. Any student of wildlife management can tell you that disruptions to top level predators can have huge impacts on prey species populations and can eventually degrade the entire ecosystem. On a species by species basis, the effects a four to six-lane major artery running through the heart of Mather - and right next a large portion of the proposed conservation areas - will have on each one might seem "less than significant," but cumulatively, the reduction in total predation at Mather could result in a total ecosystem collapse.





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The DEIR also fails to address the compatibility of land uses in adjacent areas. We content that development and land uses associated with UDA (e.g., shopping centers, high density residential), PQP (e.g., solid and liquid waste disposal, cemeteries), and REC (e.g., theme parks, sports parks) would be incompatible with protection of the adjacent vernal pool preserve lands. The areas proposed to be UDA, PQP, and a REC east of Eagles Nest (now Zinfandel Drive) sit on the up-gradient (uphill) side of seasonal drainages and vernal swales that feed westward toward the Morrison Creek drainage and across the eastern half of the proposed conservation area. As noted previously, the flow (depth, magnitude, and direction) of groundwater which sustains vernal pools across the area has not been considered and is entirely unknown at this time. It stands to reason however that in at least some areas, near-surface groundwater gradients follow a similar westward across these lands.

The long-term functionality/viability of existing vernal pools at Mather Field, including those in the proposed Natural Preserve/Resource Conservation Area-Protected (NP-RCA-P) regions may be dependent on the integrity of the groundwater (and possibly surface water) within the proposed UDA, REC, and PQP boundaries along the eastern margin of the Project. The shallow groundwater beneath these areas remains intact, despite the addition of excavation waste spread there by the Folsom South Canal project.

Future use of chemicals, fertilizers, herbicides, and pesticides within any of these proposed boundaries for any of these land use designations, both during and following construction, could easily find their way into groundwater and surface drainages that flow directly into wetlands in the proposed conservation areas, effectively killing off threatened and endangered vernal pool species. The proposed land use designations will permit as yet unknown land developments that could threaten the biological integrity of adjacent vernal pool preserve lands. We therefore conclude that this DEIR cannot satisfactorily ascertain that environmental impacts to vernal pools habitats will be less than significant without gaining a more complete understanding of the subsurface hydrology and full knowledge of ALL potential construction activities which could intersect and disrupt groundwater flow.

The DEIR fails to address the loss of a special vernal pool habitat (known locally as the Splash Critter Pool) within the proposed UDA boundaries, which as previously noted, contains the greatest diversity of threatened and endangered species anywhere in the Mather region. This pool, which contains all of the threatened and endangered aquatic invertebrate species known at Mather, is used as an absolutely invaluable research and teaching tool for hundreds of school children each year. Establishing a UDA designation on such a rare vernal pool represents a significant biological impact that is not even remotely addressed by the DEIR.

A second rare pool is within the proposed REC boundary in the southeast portion of the project area. It is the only vernal pool in Mather known to have a thriving Western Spadefoot Toad population. The DEIR correctly identifies the Western Spadefoot Toad as a California listed species of concern (CSC) and notes that there is no published regulatory guidance for habitat mitigation for this species. However, there appears to be an (implied) assumption that any vernal pool within the project area (including the proposed conservation areas) can provide a suitable habitat for the species.





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Local naturalists around Mather know full well that Spadefoots can only be found in this one very limited area. No one knows why the Spadefoot population is limited to this location, but many biologists and ecologists suspect that their habitat needs are a bit more specific than just any random vernal pool. Changing the land use designation in this area to REC will allow for developments such as theme parks and sports parks and will likely result in the total extinction of spadefoots at Mather. We consider this potential impact to a Mather biological resource to be highly significant and one that cannot be addressed with the County's irresponsible and unsubstantiated mitigation plans.

The DEIR proposes excavating every Spadefoot burrow they find by hand in order to relocate them to more suitable habitat. Without any regulatory guidance or academic expertise specifically identifying what habitat is (or is not) optimal for the Spadefoot, this assumption seems unreasonable. Furthermore, the proposed mitigation fails to recognize that Mather soils are composed of heavy clay with abundant rock cobbles, which are very hard during the summer and almost impossible to dig by hand. Spadefoot burrows can go down as much as three feet into the subsurface. Consequently, even if it were possible to dig down that far, it would not be possible to move an entire burrow (preserving the soil moisture in the process) without killing the animal inside. There is no scientific evidence or regulatory guideline to suggest this mitigation strategy will work.

Disturbingly, language in the DEIR on this subject seems to suggest that the species will likely be eliminated entirely from the Mather region, but states that because its habitat is preserved elsewhere in California, the local extinction of this population is acceptable. We counter that the likely local extinction of this species represents an unacceptable loss to biodiversity at Mather and the health of the ecosystem therein and **must not occur**.

Recommendations

Conduct a well-executed, multi-year study of shallow groundwater movement such as an Integrated Groundwater and Surface Water Model (IGSM) throughout the proposed development and conservation areas to determine potential impacts of land uses changes to vernal pools and establish more realistic setback requirements based on actual science rather than an unsupported guess. A multi-year study is necessary given the high variability of seasonal precipitation and current severe drought conditions. Results of the study can subsequently be used to change proposed boundaries of UDA, REC, and PQP areas (or eliminate them) in order to preserve hydrologic source integrity of preserve vernal pools, and to preserve and protect the highly valuable Splash Critter Pool and Spadefoot Pool. Since these pools contain very unique and genuinely rare species, the County should regard them pool as a valuable educational and environmental resource and maintain the Recreation land use designation to allow flexibility in future plans for their preservation. Alternatively, we recommend expansion of the NP-RCA-P area to encompass these valuable pools, with adequate setback requirements established to prevent any disturbance to their well-being.





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Figure 1. Alternative Alignment of Zinfandel

Hydrology and Water Quality

Insufficient Coverage of Possible Impacts from Zinfandel Re-alignment and New Sewer Trunk

Significant hydrologic features within the project footprint of the proposed sewer trunk and Zinfandel realignment include Morrison Creek and subsurface hydrology that maintains the vernal pools of Mather. As noted previously, upland areas, vernal pools, and seasonal streams at Mather are all part of an integrated surface-water/perched groundwater system that extends laterally beneath the vernal pools and surrounding habitat. Some pools are sequentially linked by this groundwater flow, such that pools at the upper end of the subsurface gradient are discharging to pools lower down. What this means is that any disturbance to the shallow subsurface hydrology has potentially dire implications in regards to impacts to vernal pool habitats and water quality throughout the project area.

The scientific support for this assertion can be found in Rains et al. (2005)¹ in which a UC Davis research team studying vernal pools at Mather concluded that:

“ . . . small changes in local land use, such as the development of irrigated agriculture or parkland, may have considerable impacts on the vernal pools. The degree to which small changes in local land use might affect the vernal pools is poorly understood, because the fundamental hydrogeological characteristics of perched aquifers remain relatively unexplored. The management of perched aquifers should rest on a scientific foundation that provides a general understanding of the conditions necessary to maintain perched aquifers capable of supporting the physical and biological functions of dependent wetland ecosystems.”

¹ Rains, M.C., G.E. Fogg, T. Harter, R.A. Dahlgren, and R.J. Williamson. 2005. **The role of perched aquifers in hydrological connectivity and biogeochemical processes in vernal pool landscapes, Central Valley, California.** Hydrological Processes.





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The Mather Neighborhood Alliance sees no evidence that the County has fully mapped the subsurface hydrology of Mather. If no such mapping has been done to determine the groundwater flow that sustains the vernal pools in the proposed preserve area, it cannot be stated that the impacts of the Zinfandel re-alignment project and the sewer trunk installation along Zinfandel are “less than significant” with respect to area hydrology and water quality. The project as proposed may cut off or irreparably alter the subsurface groundwater flow maintaining vernal pools in the preserve, reducing or eliminating their functionality as wetlands.

In addition, runoff and spillage from construction to realign/extend Zinfandel and establish a new sewer trunk beneath the roadway could severely impact water quality within the vernal pool preserve. Volatile organic hydrocarbons (VOCs) found in fuels and solvents can very quickly infiltrate and spread in shallow groundwater systems, especially when introduced through subsurface excavations. No amount of best management practices (BMPs) or stormwater management efforts can completely eliminate VOC (and similar) contamination from infiltrating shallow groundwater systems and eventually impacting environmentally sensitive habitats.

Recommendations

Because many pools are sequentially linked by groundwater flow, such that pools at the upper end of the subsurface gradient are discharging to pools lower down, it is essential that the groundwater hydrology throughout the Mather area be fully mapped and understood before any kind of infrastructural improvements are proposed for approval. Otherwise irreversible damage to existing vernal pool habitats may very well be inflicted by the proposed development plan.

Insufficient Coverage of Possible Impacts from Proposed Changes to Mather Field General Plan Land Use Designations, Mather Field Specific Plan Land Use Designations, and Mather Field Specific Plan Amendment

Similar to significant impacts the construction of Zinfandel re-alignment and establishment of a sewer trunk, the land uses made possible by the proposed changes land use designations for the Mather Field project could cause substantial harm to area hydrology and water quality. Specifically, land uses that result from the proposed designations and boundaries of the UDA, PQP, and REC could potentially deposit a tremendous amount of VOCs to waters that will move towards the preserve through both surface and subsurface flows. These include VOCs found in fuels, solvents, herbicides, and pesticides. The infiltration and spread of these VOCs into Mather’s shallow groundwater systems could cause significant degradation to water quality. While the DEIR does discuss stormwater management during construction activities, it does not address any long term contaminant management strategies or potential impacts associated with residential, business, recreational or industrial activities that will be permitted in the UDA, PQP, or REC areas.

Utility trenches, drainage channels, sanitary sewer and storm drainage lines are certain to intersect the perched groundwater table within the project area, with some potentially penetrating the hardpan layer into deeper soil strata below. These intrusions pose two obvious potential impacts to vernal pools in the surrounding areas. First, subsurface utilities and deep earthworks could disrupt groundwater flow to the point that some vernal pool areas - including those in the proposed conservation areas - could dry up much faster than normal or potentially never fill in the first place. Second, these subsurface trenches and utilities can act as “sensitive receptors” that allow contaminated surface waters to infiltrate the groundwater table and flow laterally into environmentally sensitive habitats.





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Recommendations

As stated previously, a well-executed, multi-year study of shallow groundwater movement must be conducted throughout the proposed development and conservation areas to determine potential impacts of land uses changes to vernal pools and establish more realistic setback requirements based on actual science rather than an unsupported guess. While there are no ways to contain the potential impacts to water quality from the inputs associated with construction and post-construction VOC uses on-site, recognizing where and how far those impacts might extend is essential for assessing their relative significance.

Land uses designations and boundaries proposed will need to be reassessed pending the outcome of the hydrologic study. At a minimum, the UDA boundary in the eastern portion of Mather Field to should be adjusted to ensure protection of the hydrology that feeds vernal pools in NP-RCA-P areas. This may include designations of open space and additional preservation lands.

We strongly recommend the County to abandon proposed PQP and a REC designation changes for the eastern portion of Mather Field.

Traffic and Circulation

Insufficient Coverage of Possible Impacts from Zinfandel Re-alignment and New Sewer Trunk

There are only two roads providing routes in and out of Mather. The proposed Zinfandel realignment and construction of a sewer trunk along Zinfandel requires closure one of these two roads (Zinfandel) for an undetermined length of time. The one road that would remain open – Excelsior – is a two-lane residential street through Mather that is overcrowded during morning and evening rush hours with Mather residents and through traffic experiencing long waits and low levels of service. Based upon speeding tickets issued by the California Highway Patrol at Independence points of entry, at least 20 percent of vehicles entering Mather are not from the local residential area. The actual number of non-residential traffic during rush hours could be higher as speeding tickets are not issued with regularity on these roads. With closure of Zinfandel (Eagles Nest) all Mather residents will be forced to take Excelsior in and out of the subdivision, further loading an already-crowded thoroughfare.

If during the weeks or months of proposed construction that closes Zinfandel (also known as Eagles Nest), an emergency vehicle needed access to a Mather residence during these rush hours, it would be impossible to get through that traffic quickly. There is nowhere for the traffic to go to make way for a police car, ambulance or fire truck, other than onto people's lawns. Delays in emergency services can result in grievous injury, and even death, to Mather residents. The closure of Zinfandel (via Woodring Drive) would also leave residents vulnerable in the event of an emergency evacuation order. We consider these to be very significant impacts. None of these issues have been addressed in this DEIR, nor has any mitigation been communicated to the public.





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Recommendations

Delay any and all construction that would close Zinfandel until the planned Douglas Road Extension has been constructed to allow through traffic an alternative route around Independence at Mather.

The existing Zinfandel (Eagles Nest) Road alignment should remain where it is any new extension should be wrapped around the southern boundary of the golf course as illustrated in Figure 1. If the sewer trunk must be extended, we recommend that access be brought in via Kiefer Boulevard to the south. According to this DEIR, "Kiefer Boulevard has been identified as a suitable area for commercial development..." If Kiefer will contain commercial development, a sewer extension will be required. Bringing in sewer from the south via Kiefer will avoid several significant impacts identified in this comment letter.

Insufficient Coverage of Possible Impacts from Proposed Changes to Mather Field General Plan Land Use Designations, Mather Field Specific Plan Land Use Designations, and Mather Field Specific Plan Amendment

Changes in land use designations will bring as yet unknown and unstudied changes to traffic flow throughout the project area. Numerous issues relating to air quality, water quality, and biologic resources associated with anticipated increases in traffic flow have already been described.

As previously stated, the County has not completed traffic studies for any alignment alternative or assessed potential local impacts to traffic from future development. There are no data to project the total number of vehicle trips, ambient noise generation, vehicle velocity, potential collisions with wildlife, vehicle emissions, etc., associated with the alignment and thus cannot draw any relevant conclusion regarding potential impacts or their relative significance. The DEIR fails to consider or address any impacts that roadway development on this alignment might impose on the aesthetic value of surrounding land or land use.

Recommendations

Fully complete traffic studies, including assessments of thru-traffic loads from outside Mather and local traffic loads associated with future development at Mather. Without these, the County cannot adequately address impacts from proposed land use changes, boundaries, and roadway alignments.

Climate Change

Insufficient Coverage of Possible Impacts from Zinfandel Re-alignment and New Sewer Trunk

Roadways add more heat to a given area as solar radiation is absorbed and re-radiated out as infrared (thermal) heat. Additional blacktop lanes will increase localized temperatures.

Recommendations

Maintain Zinfandel as a two-lane road.





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Insufficient Coverage of Possible Impacts from Proposed Changes to Mather Field General Plan Land Use Designations, Mather Field Specific Plan Land Use Designations, and Mather Field Specific Plan Amendment

Natural land surfaces cool down much more rapidly than developed land surfaces via less specific heat retention. Replacement of the area's grasslands with roadways, blacktop, and rooftops will permanently alter the local climate.

Recommendations

Decrease development footprint and provide for more open space.

Aesthetics

Insufficient Coverage of Possible Impacts from Zinfandel Re-alignment and New Sewer Trunk

The County failed to consider the compatibility of a 4-lane traffic artery within the existing community and have disregarded the impacts this type of road will have aesthetic value of Mather's preserves and existing residences. This impact is significant and has not been identified as such in the DEIR.

Recommendations

Retain Zinfandel (Eagles Nest) as a two-lane road and do not extend it southward alongside the Mather Preserve.

Insufficient Coverage of Possible Impacts from Proposed Changes to Mather Field General Plan Land Use Designations, Mather Field Specific Plan Land Use Designations, and Mather Field Specific Plan Amendment

In the Initial Study checklist, the DEIR states that "The project does not occur in the vicinity of any scenic highways, corridors, or vistas." and that "Construction will not substantially degrade the visual character or quality of the project site." Neither of these assertions is true. Much of Mather Field is a scenic corridor. Hundreds of children each year visit Mather Field to learn about vernal pool ecosystems and water conservation. Many have never seen wide vistas and open grasslands like those at Mather and would be unable to travel farther afield to be able to experience this kind of aesthetic. People from all over the state (and even from abroad) come to marvel at the wildflower blooms around Mather Field. The much loved public television host Huell Howser even visited the vernal pools of Mather and his show on the subject "California Gold" still airs each year.

The DEIR makes no mention of light pollution or noise pollution and potential impacts these might have on sensitive vernal pool habitats. Without a doubt, there are many species within the project area that are nocturnal or crepuscular, some of which are undoubtedly going to be affected adversely by light pollution from the proposed development areas. The DEIR also fails to address urban noise pollution associated with development after construction is completed. One of the most appealing aspects of living in Mather Field is the relative quiet compared to the surrounding region. This is especially true in the southeastern portion of the proposed conservation and urban development areas, well away from the airport. Aside from occasional "touch and go" training flights by the local air national guard wing, the Mather Field grasslands along Eagles Nest road are extraordinarily quiet much of the time. It is difficult to imagine that years of housing construction and the addition of many thousands of additional cars per day travelling on an expanded Zinfandel Drive will not have an impact. Many of the very best, most visited and most appreciated vernal pools at Mather Field





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are immediately adjacent to this proposed extension of Zinfandel. The roadway, development, and associated traffic will create a significantly negative impact on the aesthetic value of these pools and their appreciation by numerous members of the public.

The DEIR fails to consider any impacts the project might have on these less tangible, yet no less important aspects of our community. Construction will substantially degrade the visual character or quality of the project site. The removal of natural open space, grasslands, trees, and water features for installation of roadways, blacktop parking lots, and buildings will permanently alter the aesthetic value of Mather. This impact is significant and has not been identified as such in the DEIR.

Recommendations

Decrease development footprint and provide for more open space.

Conclusions

Because the DEIR does not address the development impacts that will result from proposed land use and boundary changes to the Mather Field General Plan, Mather Field Specific Plan, and Mather Field Specific Plan Amendment, it lacks sufficient information to determine the true and cumulative impacts of the proposed action. The repeated statements in the DEIR admitting that the full extent of construction activities within the proposed development areas are "unknown" indicate that the County has not done its due diligence in fully evaluating the short- and long-term environmental impacts of this project. Thus it follows that the repeated conclusions of "less than significant" impact are invalid as well.

We urge the County to consider the full suite of impacts, including cumulative impacts, that proposed changes in land use designations and infrastructure construction will bring about to the community of Mather.

Respectfully submitted,

Mather Neighborhood Alliance

