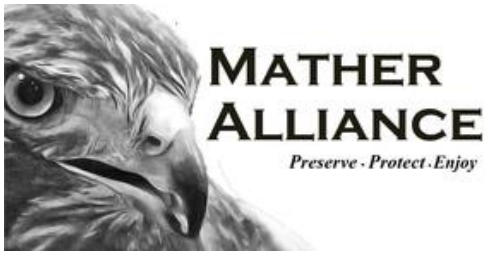

To work with stakeholders to advocate for responsible use and management of Mather Field resources.

February 21, 2019

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

Email to CEQA@saccounty.net and Todd Smith: smithtodd@saccounty.net

RE: Mather South Community Master Plan Project Draft Environmental Impact Report
County Control Number: PLNP2013-00065

To Sacramento County Office of Planning and Environmental Review:

The Mather Alliance core group and its members wish to express sincere thanks to Sacramento County Supervisors, County staff, and the Lewis Group for their continuing efforts to involve community members in shaping the new development proposed for the retired Mather Air Force Base. We feel grateful for the opportunity to advocate for the responsible use and management of Mather Field's valuable resources.

Area residents and Mather wetlands supporters are particularly proud of the cultural, historical, and ecological significance of these lands of Sacramento County. Our culture is one of deep respect and appreciation for the plants and wildlife that live among and around us. Mather's historical significance as an Air Force base of great strategic importance for national security and as a continuing aviation training facility makes us proud. As does our local ecology which includes world-class vernal pools filled with extremely rare species, some of which have not even officially been named yet by scientists. There is much to be proud of at Sacramento County's Mather and much to protect.

In addition to the points we addressed below in our comments on the Mather South Draft Environmental Impact Report and Community Master Plan, we wish to make a special request. To reflect our esteem and gratitude for Sacramento County Supervisor Don Nottoli's dedicated involvement with and attendance to our community, the Mather Alliance requests that a road in the new community be named "Nottoli Way." We feel "Nottoli's way" is exemplary. As a community leader and public servant, he consistently listens to our community members' concerns and demonstrates that he genuinely cares about our future.

We look forward to continuing our collaboration with the County to ensure that Mather resources and values are preserved. Therefore, we respectfully submit the following comments in response to the Mather South Draft Environmental Impact Report (DEIR), including specific comments regarding the Mather South Community Master Plan.

Watershed to the Critter Pool and Fill Dirt in Environmental Campus Parcel

Area of Concern: Environmental Campus

Issue/Impact: Unnecessary loss of valuable natural features and historic resources

As discussed at length in various stakeholder and supervisory board meetings during consideration of the broader Mather Field project, the community value of the former USAF munitions storage complex (currently designated as parcel EC in the Draft Mather South Community Master Plan) stems from its historic significance as part of Mather Air Field and the natural features located adjacent to it and running through it. While we appreciate that this parcel has been designated as a site for a future Environmental Campus, we are concerned that the specifics of the proposed grading and drainage plan (reference **Exhibit J of Appendix HY-1**: *Mather South Drainage Master Plan Developed Condition Trunk Drainage and Basins*) unnecessarily erases both the natural and historic resources presently existing on this parcel.

As presently indicated on the drainage plan, the EC parcel will be filled and graded to elevations ranging from 156 to 160 feet. Topographic data (**reference Exhibit C of Appendix HY-1**) indicates that the current surface elevations in this parcel vary from 149 to 155 feet (not including structures). Consequently, almost the entire EC parcel is slated to be filled and leveled to depths as much as 9 feet, including the existing drainage swale that presently sweeps through the western half of the parcel from parcel SP1 toward the preserve on the western margin and all of the existing historic structures.

We contend that this represents an unnecessary loss of natural and historic resources that could potentially enhance the desirability of the planned Environmental Campus, school (parcel SP1), community center (parcel CC) and park (parcel PARK 1). Natural features quite clearly enhance the livability of a community and business environment, while the historic features represent a unique character quality that the community has expressed, many times, its interest in preserving as part of Mather Field (and by direct association, Rancho Cordova) history.
We also are concerned about the visual impact of increasing the grade on this parcel will have on adjacent resources, especially the Critter Pool (parcel OSNP1), which was specifically set aside to help protect the irreplaceable biological resources located in that vernal pool. As currently envisioned, the grade from the EC parcel will drop a full 10 feet on the eastern margin down to an open space drainage (OSD6) and the Critter Pool. Given the proposed roadways and elevations of other developed parcels, the Critter Pool will be effectively isolated visually and topographically, which we believe may cause its perceived value (and thus its preservation) to be diminished in the eyes of residents living at Mather South.

Recommendations:
We would like to see the grading plan for the EC parcel (and possibly adjacent parcels) revised to help preserve and enhance existing natural features that we believe will help make the entire community (business and residential) more livable and environmentally friendly. Specifically, we contend that drainage from parcel SP1 could be contained in a detention basin/bioswale on its southern margin and used to enhance the drainage swale through the EC parcel as part of the environmental draw of the parcel.

We would also like to encourage the Lewis Group to reconsider the total demolition and fill of the former weapons storage facility and solicit additional input from stakeholders about the reuse of existing structures. We believe that the reuse of one or more former USAF buildings on the parcel presents rare opportunity for organizations and businesses to adopt environmentally friendly building reuse/redevelopment methods rather than resort to demolition and new construction. This goes very much hand in hand with the community's proximity to the Mather preserve and serves to integrate the ideals of integrating the natural and built environments into one livable community.

Area of Concern: Drainage Plan

Issue/Impact: Proposed drainages for the northern half of the Mather South Master Plan rely on very large detention basins concentrated on the western margin of development.

For much of the northern half of the planned development, the proposed drainage lines redirect drainage toward one of three large detention basins along the western margin of the community (reference **Exhibit J of Appendix HY-1).** Designated as Basin-01, Basin-02, and Basin-03 in the drainage plans, these areas represent a significant accumulation of surface drainage in a limited area.

While we understand the need for hydromodification mitigation with respect to existing drainages, we are concerned that reliance on these three large basins presents a potential subsurface hydraulic impact to preserve areas located immediately to the west. Furthermore, basins -01 and -02 also require the addition of at least 6 feet of surface fill to construct the berm around them and will visually stand out as very unnatural features relative to the preserve to the west and the environmental campus, park, and community center to the east.

Recommendations:
We contend that drainage management and hydromodification mitigation plans can be better achieved through use of more and smaller detention basins/bioswales dispersed across the northern half of the development area. By adopting a more dispersed approach, the natural drainages already present on the site can be more effectively used to manage stormwater discharge. Furthermore, smaller basins and swales incorporated along the margins of developed parcels help to incorporate natural features within the community and help break up the visual impacts of development, both of which enhance the livability of the community as a whole.

We suggest that a good example of this more dispersed approach to drainage management exists in parts of Folsom where numerous small basins and marshes between neighborhoods serve to create a more natural and livable condition. Paired with walking/cycling paths, these natural buffers create a much more desirable community to live in and help mitigate the typical trappings of visually uninspiring landscaping and concrete block soundwalls.

As discussed previously as an example, we believe a small marsh filled detention basin at the southern margin of parcel SP1 would serve as an excellent way to manage stormwater flows, supply water to a visually impactful natural drainage across the Environmental Campus, and could potentially serve as a valuable onsite natural learning resource for the future school.

Area of Concern: The Critter Pool

Issue/Impact: Proposed grading and drainage plans may still impact the health and long-term viability of the Critter Pool

As noted previously, the proposed grading plans for the Environmental Campus present an unfortunate visual impact on the Critter Pool and parcel OSNP1. While we deeply appreciate and value that this area has been set aside as a preserve, we are concerned that its position relative to other proposed developments around it might isolate it as an undervalued and unmaintained resource that could eventually impact its biologic viability.

Our review of historic aerial imagery of the region prior to construction of the Folsom South Canal indicates that the Critter Pool was once part of a much larger and expansive vernal pool and swale complex that was subsequently buried beneath excavation overburden from canal construction. We contend that despite burial, the subsurface hydrology that once existed through this pool and swale system continues to channel water toward the Critter Pool and beyond. In fact, we believe that the biological diversity and extended wet period found in the Critter Pool is due in large part to the former subsurface hydrologic system sustaining groundwater flow to this location.

Thus, we are concerned that development of residential parcels R5, R6, R13 may have the unintended effect of depriving groundwater flow to the former pool and swale system, eventually degrading the hydrologically favorable conditions found at the Critter Pool.

Recommendations:
We believe that parcel OSNP1 provides an excellent buffer to protect the health of the Critter Pool. Furthermore, we believe that development of parcels R5, R6, and R13 can proceed as planned. However, we recommend that the drainage plans be modified to include the addition of several small stormwater basins/marshes (perhaps one per parcel) to contain surface runoff and allow groundwater infiltration through those basins into the subsurface hydrologic system that feeds into OSNP1 and the Critter Pool. Our resident geologic consultant would be happy to share the details of the former vernal pool and swale system and help guide planners in placing these detention basins.

Adding intermediate drainage basins would have the additional benefit of reducing potential peak flows to the stormwater system, thus decreasing the need for larger basins elsewhere and allow peak discharges to be dispersed to natural drainages more effectively. As discussed previously, these smaller basins would have the additional benefit of helping incorporate natural environments into the community, making them more livable and visually interesting. Such natural areas will also help tie the community in with the Environmental Campus and preserve, which we contend should be an integral part of the draw to living at Mather.

With respect to grading issues, please reference the previous discussion regarding grading and fill on the Environmental Campus.

Area of Concern: Fill Sourcing and Noxious/Invasive Weed Mitigation/Abatement

Issue/Impact: The source and quality of fill required for grading in some portions of Mather South is not clearly defined. The DEIR and community Master Plan do not contain specific protections to prevent potentially contaminated soil disturbance and/or redistribution or noxious weed dispersal migration as applied to cut/fill materials sourced onsite or imported.

It is apparent that some portions of the Mather South development are slated to undergo a significant amount of grading and fill. It is unclear from our review of existing topography (**reference Exhibit C of Appendix HY-1**) in comparison with proposed grading and drainage plans (reference **Exhibit J of Appendix HY-1)** if sufficient material can be cut from higher elevations and regraded to infill lower lying areas. If adequate material for fill cannot be found onsite, we are concerned that imported fill materials could pose a risk to waterways and the nearby preserve if they are sourced from contaminated locations and/or areas with noxious/invasive weed problems.

Even if fill materials can be sourced onsite, the DEIR already notes that additional hazardous materials might be potentially uncovered during grading, notably in former USAF fuel storage, munitions disposal, and small arms firing range locations. However, there is ample reason to suspect that not all former USAF activities in the area were documented. Other decommissioned USAF sites (notably McClellan) have turned up some potentially serious contaminants in recent history, so the potential for unknown contaminants turning up in previously undocumented locations is not without precedent.

Although the DEIR specifies that a Contaminated Soil Contingency Plan must be submitted to the County prior to construction, there is no allowance for public review of this plan to ensure that adequate protections and monitoring procedures are in place to prevent disturbance and redistribution of potentially contaminated soils.

Furthermore, there are already well-documented and ongoing invasive weed problems occurring within and around the Mather preserve, especially toward the northern end. The DEIR does not appear to contain any language specifying mitigation procedures or best practices to ensure that grading activities for the Mather South development do not inadvertently advance the spread of noxious weed species into the southern end of the Mather preserve, either through aerial dispersal or via existing waterways.

Recommendations:
We would like to see some additional clarification of planned excavation, grading, and imported fill plans, procedures and policies, either in the DEIR or in the Mather South Community Master Plan. Noxious/invasive weed management and dispersal mitigation plans should be a requisite component of the construction application process for this sensitive area. Such plans (including the Contaminated Soil Contingency Plan) should be made available for public review prior to approval and community input from stakeholders (especially those familiar with weed management and abatement best practices) should be solicited to ensure that environmental degradation to the Mather preserve is not exacerbated.

Area of Concern: Preserve Management

Issue/Impact: The lack of coordination and cooperation between the current Preserve Manager and Mather stakeholders is of great concern to the Mather Alliance and other parties interested in preserving Mather's vernal pools.

A number of local vernal pool experts who care about the Mather preserve have worked for preservation of its vernal pools for years without compensation or payment. Their efforts come from a sense of duty of stewardship to protect an extremely rare resource that is continuously disappearing via land development - the California Central Valley vernal pool. Mather's vernal pool expert constituents have been effectively cut off from participation in Mather preserve management by the current Preserve Manager. This lack of coordination and cooperation eliminates the Preserve Manager's access to valuable information that could be made available from years of experience and knowledge of the Mather vernal pools. In addition, blocking local experts from the preserve's management discourages that piece of public participation that helped to make the preserve possible.

Recommendation:
The Alliance would like to see a requirement that the Preserve Manager include the input of local vernal pool experts and stakeholders in management actions. In addition, there are a number of volunteers willing to pull weeds in the preserve. Though this method of weed control is not cost effective from a profit-driven model of preserve management, it can be the safer way to remove some invasive plants. Lower cost methods such as pesticide use, controlled burns, and grazing can cause unintended negative impacts to vernal pool species. When free labor is available for weed pulling, it benefits the preserve to use it.

Issue/Impact: The current preserve management efforts are not sufficient to control invasive plant species.

Local vernal pool experts have commented for the last several years, with increasing concern, that not enough is being done to control threatening invasive plant species that are encroaching upon Mather's vernal pools. This could be due to a lack of sufficient funding, or lack of a comprehensive strategy. In either case, the result is a lack of safe and effective action to protect the vernal pool species.

Recommendation:
Again, a number of volunteers are willing to give their time and expertise to help preserve the vernal pools of Mather. We believe Sacramento County would miss a great opportunity by not incorporating these volunteers into the preserve management. The Mather Alliance recommends that the County direct the current Preserve Manager to coordinate and cooperate with local Mather stakeholders. In addition, the Mather Alliance requests that the County adopt a "pay-for-performance" approach for the Mather preserve with specific measurable objectives that the Preserve Manager must meet in order to retain the management contract. There is too much at stake to risk a lack of progress.

Issue/Impact: Preserve Access (Page 4-43 of Appendix PD1 Master Plan), Action 4-4: "Provide docent-controlled access to vernal pool preserve areas under the direction and authority of the Sacramento County Regional Parks Department Director."

Though the Mather Alliance appreciates the provision of docents by both the County and Sacramento Splash for guided walks, the Alliance wants to ensure that the public will retain reasonable access to the vernal pool preserve lands and that their access is not limited to guided walks.

Visitors currently access parts of the preserve for amenities that do no harm to the preserve, such as nature appreciation, photography, and meditation. Though Action 4.4 may not intend to limit preserve access to County-supervised visits only, it could be interpreted that way, and we want to ensure the intent is clarified. The preserve is a public resource and should remain open to the public as long as they abide by and respect the rules that are designed to protect the resources therein.

Recommendation:
Add clarifying language to the Action that docents may be provided by the County, but that County-provided docents are not required to be present for members of the public to access the preserve.

Area of Concern: Artificial Lighting

Issue/Impact: Artificial lighting, especially outdoor lighting, will disrupt the ecosystems and/or safety of plant and animal life within the proposed Mather South development area and its vicinity, including Mather preserve, Mather Lake, and the Mather golf course.

According to The International Dark Sky Association (IDSA) statistical research,[1] "All life relies on Earth's predictable rhythm of day and night. It's encoded in the DNA of all plants and animals. Humans have radically disrupted this cycle by [artificially] lighting up the night. Plants and animals depend on Earth's daily cycle of light and dark rhythm to govern life-sustaining behaviors such as reproduction, nourishment, sleep and protection from predators.

Scientific evidence suggests that artificial light at night has negative and deadly effects on many creatures including amphibians, birds, mammals, insects and plants.

Artificial Lights Disrupt the World's Ecosystems. Nocturnal animals sleep during the day and are active at night. Light pollution radically alters their nighttime environment by turning night into day.

According to research scientist Christopher Kyba, for nocturnal animals, "The introduction of artificial light probably represents the most drastic change human beings have made to their environment. Predators use light to hunt, and prey species use darkness as cover near cities, cloudy skies are now hundreds or even thousands of times brighter than they were 200 years ago. We are only beginning to learn what a drastic effect this has had on nocturnal ecology.

Glare from artificial lights can also impact **wetland habitats** that are home to amphibians such as frogs and toads, whose nighttime croaking is part of the breeding ritual. Artificial lights disrupt this nocturnal activity, interfering with reproduction and reducing populations.

[1] International Dark Sky Association at https://www.darksky.org/light-pollution/wildlife/

Artificial Lights have Devastating Effects on Many Bird Species. Birds that migrate or hunt at night navigate by moonlight and starlight. Artificial light can cause them to wander off course and toward the dangerous nighttime landscapes of cities. Every year millions of birds die colliding with needlessly illuminated buildings and towers. Migratory birds depend on cues from properly timed seasonal schedules. Artificial lights can cause them to migrate too early or too late and miss ideal climate conditions for nesting, foraging, and other behaviors.

Ecosystems: Everything is Connected. Many insects are drawn to light, but artificial lights can create a fatal attraction. Declining insect populations negatively impact all species that rely on insects for food or pollination. Some predators exploit this attraction to their advantage, affecting food webs in unanticipated ways."

Recommendations:
Request that Lewis Group waive general developer's lighting standards; instead, adopt Model Lighting Ordinance [2](MLO) developed by the IDSA and the Illuminating Engineering Society of North America to address the need for strong, consistent outdoor lighting regulation in North America.

Developed jointly over a period of seven years, the MLO encourages communities to adopt comprehensive outdoor lighting ordinances without devoting extensive staff time and resources to their development.

Prohibit sports field lighting within the development. The excessive amount of light associated with sports fields creates a number of environmental impacts as outlined in the section above.

Area of Concern: Traffic Management During Sewer Line Trenching

Issue/Impact: Sewer Line Trenching on Zinfandel Drive — Impacts to Independence at Mather Community

The draft EIR is silent regarding the impacts to the 1,271 households of the Independence at Mather Community ("the community") during the sewer line trenching on Zinfandel Drive from Douglas Road to Woodring Drive. While construction of this section of the sewer line was in the Mather Field Specific Plan Draft EIR, we believe this issue should also be addressed in the Mather South Community Master Plan as well.

There are only two roads to enter/exit the Independence at Mather community. Closing Zinfandel Road for sewer trenching will eliminate one. This closure will severely impact the remaining entry/exit points to the community: 1) Woodring Drive at Excelsior Road 2) Arnold Way at Excelsior Road. The impact includes adding to the already heavy traffic on Excelsior during commute hours, and potentially causing massive gridlock on Arnold Way and Woodring Drive with vehicles waiting to exit onto Excelsior Road. Additionally, closing Zinfandel Drive, the only eastern entrance to the community, will severely impede response time and access of emergency vehicles to our community.

[2] Model Lighting Ordinance: https://www.darksky.org/our-work/lighting/public-policy/mlo/

Further, entrances into the community are currently two-lane, narrow streets with vehicle parking on one side only. Driving space allows one vehicle width for each narrow lane. As a result, when vehicles are parked, these roads do not allow space for motorists to pull over to allow emergency response vehicles to navigate through traffic during peak commute times. Sacramento County representatives have advised the community that they are drafting a traffic and emergency plan. This plan has not yet been shared with the community for review.

Recommendation:
We suggest that during sewer trench construction that Zinfandel Drive remain open with at least one single traffic lane with traffic control flaggers and/or flashing red light. In addition, possibly 1) Limit traffic to deliveries, residents, and emergency vehicles only. 2) Install three-way STOP signs with flashing lights at the intersections Excelsior Road and Woodring Drive, and at Excelsior Road and Arnold Way. 3) Deploy officer-directed traffic during peak commute times.

Area of Concern: Species Mitigation

Issue/Impact: Mitigation measures listed for species are vague.

One of the core values of the Mather community is our concern for the welfare of Mather's wildlife. This planned development necessitates earth movement and deposition that will likely devastate and obliterate over 800 acres of existing habitat for all critters currently living there. The least we can do is ensure that earth movement is done with the greatest of care to minimize the number of animals killed or "taken."

Recommendation:
Include specificity in the mitigation measures to inspect for wildlife pre-construction and to relocate individuals, including provisions for new homes (e.g., for burrowing owls, if present).

Area of Concern: Community Theme

Issue/Impact: Request to change community theme from aviation to wetlands and nature preserve. Establish a community theme of nature and open space benefits of the surrounding wetlands preserve. (Reference Mather South Community Master Plan Policies 4.5-11, 6.5.1, 6.10.1)

Residents (and visitors) may respect and steward the environment if they are exposed to featured design elements and education regarding the sensitive wetlands preserve and the need to protect its natural resources, not only for the sake of the environment, but also for the aesthetic value.

Recommendation:
The proposed project theme could salute the area's past aviation history in some areas, while predominantly highlighting the value of a wetlands preserve. We propose to heighten awareness by naming streets after the preserve's wildlife, habitats, and plant species. As part of the homeowner handbook, we suggest the developers include a section of the history, features, and regulations regarding the preserve. And, to bolster our support of preserve access as described above, provide a self-guided walking tour of the preserve with interpretive signage.

Area of Concern: Reinstate Eagles' Nest Road name instead of Zinfandel Drive

Issue/Impact: Previously, the section of Zinfandel Drive south of Douglas was named "Eagle's Nest Road." Without prior public notice to the Community, Sacramento County renamed it Zinfandel Drive. We request Sacramento County reinstate the name to "Eagle's Nest Road."

We believe that reinstating the name of Eagles Nest Road supports the goal of the preserve mitigation package to enhance efforts to preserve and protect the preserve and its wildlife by increasing the consciousness of drivers of the reality that they are passing through or are adjacent to sensitive preserve land: a wildlife protection zone that require slower speeds and higher alertness.

Recommendation:
The name of the "preserve paseo" (the road through the preserve), which is currently shown on the Mather South master plan maps as Zinfandel Drive, should be restored to its original name: Eagles Nest Road. We propose that when drivers traveling on Zinfandel Drive cross Douglas Road, the road signs should change to Eagles Nest Road (as it was previously). This road name change and prominent signage will signal the transition from a fully urban setting to a zone of vernal pool preserves, which will continue to extend further south as other near-term developments come on line.

By introducing a road name change with prominent signage at the northern boundary of the preserve (at Douglas Road), it would demarcate the point at which drivers need to reduce speed to 35 mph* (and associated vibration and road noise) to potentially reduce collisions between vehicles and animals migrating through and beyond the preserve. Again, to reinforce that travelers are entering a sensitive preserve, the mitigation efforts should include prominent signage (funded as part of the mitigation for this development) that announces entrance into a preserve and defines the rules of the road through the preserve.

*The posted speed limit of 35 mph aligns with the Zinfandel Drive traffic calming measures as described in the Mather South Community Master Plan Transportation section.

Again, we wish to express our gratitude for the opportunity to offer input in the development of and comment on the Mather South DEIR and Community Master Plan.

Respectfully yours,

The Mather Alliance Core Group:

Nate Manley
Vanessa Emerzian
Lisa Infusino
Ken Pawlowski
David and Joy Nahigian