

JON & BARBARA WROTEN



February 28, 2011

John Engstrom
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Doug Kleinsmith
Office of Environmental Affairs
U.S. Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

RE: Scoping Comments for the Joint Operations Center (JOC) in Sacramento, California

Thank you for the opportunity to provide scoping comments for the environmental impact statement/environmental impact report (EIS/EIR) on the proposed Joint Operating Center for water supply and emergency flood operations by the federal Bureau of Reclamation and the California State Department of Water Resources. Our comments are below.

ECONOMIC IMPACT

Locating the proposed JOC at the proposed Gold River site will have a direct negative economic impact upon all homes immediately adjacent to the site, like our home in The Classics community on Gold Pointe Drive and the Mother Lode community and the homes on Old Eureka Drive in Gold River. Specifically, there are thirty-seven homes that are immediately adjacent to this site. These homes share and enjoy the current visual benefits of the proposed parcel's urban greenbelt. Construction of the proposed JOC on this site would negatively impact these home owners in many ways including a direct and immediate financial harm. Many other nearby homeowners would also be negatively impacted in similar ways but to varying lesser extents as the homes move further away from the proposed site.

The EIR/EIS should describe the negative financial impact on homeowners, both immediately adjacent, and nearby homeowners and neighborhoods on both sides of the river, both the

communities of Gold River and The Bluffs at Curragh Downs. These negative impacts should be fully mitigated.

NOISE POLLUTION

Locating this facility immediately adjacent to the residual communities of Gold River, and more specifically to The Classics and Mother Lode Village will result in increased noise pollution in the surrounding areas. The building and facility will generate noise both from operations and the general *Hummm* that a large building and facility generates from continuous operations of items such as HVAC, electricity, and other building operations and systems from a 200,000 square foot, 600 person, 24/7 facility.

The draft EIR should fully identify and evaluate the noises and vibration levels and the impacts they will have on the residents, wildlife, and habitat, to include the recreational users of the American River Parkway. The noise pollution should be fully mitigated.

INTERMITTENT NOISE POLLUTION

This facility will be located within the residual community of Gold River, and more specifically located immediately adjacent to the bedrooms of homes located in the The Classics and Mother Lode Village. As the JOC facility will be staffed on a 24 /7 basis, and will have staff coming and going at all hours after normal business hours to include shift changes in the middle of the night for the swing and graveyard shifts, and during periods of emergency operations, there will be intermittent noises and noise pollution as a result of people coming and going. Examples of these will include, but will not be limited to car doors opening and closing, car engines starting, the various sounds of the individual employees cars and their arming and disarming beeps, horns and bells as the vehicles are remotely locked and unlocks. All of these sounds from the parking areas will be immediately adjacent to the bedrooms and bedroom walls of the thirty-seven homes on the site property line. Studies have shown that there are harmful effects to people caused by these types of intermittent sounds during sleep hours. Additionally there may be many other intermittent sounds and noise levels that result from cycling of equipment or mechanical devices on the site, and any alarm, warning or bell type devices that may be planned to exist should the site be constructed here. Additionally activation of access gates and doors to the facility will result in further intermittent or random noise pollution.

The draft EIR should evaluate the levels and impacts of the intermittent sounds that might likely result from this facility and its employees. These intermittent noise pollution impacts should be fully mitigated to have no impact on the neighboring residences and the greater community including the wildlife, habitat and parkway.

LIGHT POLLUTION

Locating a 200,000 square foot, 24/7 medium to high security facility and the associated 600 vehicles for the employees of the facility will generate significant amounts of light from building operations, security and parking lot lights, and from vehicle head lights. This will significantly impact the ability of neighboring residents to continue to have the enjoyment of their property without the interference of significant light being imposed on their (and my) property. There will additionally be the secondary interference with the night or 'dark sky' as a result of the facility and all of the adjacent lighting and vehicles.

The draft EIR should evaluate the impact of light pollution on the wildlife, habitat, and the surrounding residents. In addition to a full evaluation, special emphasis should be given to evaluating the psychological and medical impacts on the residents by the additional lighting on the rear of the thirty-seven houses that are immediately adjacent to the proposed site and the site is being located facing the bedroom and sleeping areas of these houses.

GENERATOR

The JOC is described as a 24 / 7 facility for emergency flood control purposes that requires reliable power sources. The present site, (and therefore the proposed site would be presumed to have at least the same) has a free standing fuel powered generator for emergency power back-up. The size of this generator is approximately the size of a railroad steam locomotive within a cinderblock containment structure that is fully open on the top. These units when operated generate significant levels of noise and air pollution. They further require large stores of fuel and chemicals for their operation. Additionally there are elevated risks of possible fire, explosion, hazardous chemical spills associated with their presence at a site. In addition to their operation in the event of a power outage, they must be regularly started and tested to comply with both preparedness policies and procedures, and legal requirements.

The hazards and risks of fire, explosion, sound and air pollution, hazardous fuel sources and chemicals associated with this emergency generation unit should be completely examined, documented, and fully mitigated.

MAGNETIC FIELD / RF INTERFERENCE AND POLLUTION

The proposed JOC will have numerous communication antennas, microwave dishes, and other devices. Additionally the building, equipment, electronics and facility, included the communications equipment will emit electromagnetic field and RF interference and pollution. There are known harmful effects associated with electromagnetic field / RF pollution to humans.

Locating this facility at the proposed Gold River site directly increases the exposure by local residents to these harmful effects. For this reason, the JOC should not be located immediately adjacent to a bedroom community.

The draft EIR should fully evaluate the sources and levels of electromagnetic fields and RF interference and pollution generated by the proposed site and the effects of these on the health and long term wellbeing of the residents living immediately adjacent to the proposed JOC, and in addition the same effects should be fully evaluated for the surrounding communities, American River Parkway users, wildlife and habitat.

These effects should be fully mitigated.

PRIVACY

The JOC is described as a high security facility. One security element of the site will likely be security cameras, many of which will be outward facing, and will likely be installed to view the parking, fence lines and perimeter to observe, identify and record possibly threats around the exterior of the perimeter and approaching the perimeter. These cameras, and the people operating them will likely have visual access of the backs of the residences adjacent to the site, and the cameras located higher above ground level, and on the upper parts of the building(s) will likely have visual access into the fenced back yards of the surrounding houses. The houses that are adjacent to the site are situated such that the living spaces including the bedrooms would be in full unrestricted view of these cameras and other recording devices creating an unacceptable, and possible criminal intrusion into the privacy of the neighboring residences.

This violation of the privacy rights of the neighboring homeowners and residences should be completely prohibited.

SEWER AND WATER INFRASTRUCTURE

Within the Gold River area, the sewer and water infrastructure was designed for residential and is fully at capacity. Locating a large commercial facility at the proposed site within Gold River will overtax the existing infrastructure. The scope of the EIR/EIS should include a complete examination of all sewer, water (potable and non-potable), and other infrastructure that would be connected to, utilized by, or impacted by the proposed JOC. These effects should be fully mitigated.

TRAFFIC

The proposed site can be accessed from Hazel Avenue and Gold Country Boulevard. However, one of the site criteria is that the site is close to restaurants. The nearby restaurants (McDonalds, Taco Bell or Quiznos and Starbucks) are all located on Tributary Point Drive just west of Hazel. In order for the JOC employees to return to the JOC site from these locations, a left turn (north) onto Hazel is not an option, there is a mandatory right (south) turn away from the site. The most likely route back to the site would be west on Tributary Point Drive to Tributary Crossing, north on Tributary Crossing to Gold Country, and then east on Gold Country back to the site entrance. This routes all traffic through small streets intended to be for residential and neighborhood access and would create a heavy traffic burden on the small roads and the lighted intersection at Gold Country and Tributary Crossing. In the alternative, there are a large number of restaurants located on Sunrise from Highway 50 to Gold Country Boulevard. However to access these, it would be most likely that JOC employees would travel west on Gold Country Boulevard to Sunrise through the Gold River community. While taking Highway 50 to Sunrise and returning by Highway 50 would be an option, it is not the convenient, and therefore not the likely route that would be taken.

The draft EIR should specifically evaluate the traffic, pollution and noises impacts not only on Hazel and Gold Country to access the site, but on surrounding roadways that will see incidental increases in usage as a result of 600 employees being located at the JOC site and driving to local restaurants. The draft EIR should fully mitigate any adverse traffic noise and pollution impacts on to Gold River Boulevard, Tributary point and Tributary Crossing, to include the entire Gold River community, so that the existing traffic situation does not become worse.

One of the selection criteria for a JOC site was that it was within a 20-minute commute from downtown Sacramento. According to Mapquest, it is 19.27 driving miles from the proposed JOC site to the Department of Water Resources headquarters located at 1416 - 9th Street in downtown Sacramento. It is not possible to make this trip in 20 minutes as portions of the trip are on roadways with 25 to 35 mile per hours speed limits.

This site does not appear to meet the "20-minute commute from downtown" criteria.

The traffic on Hazel Avenue is already at level F (failing) and Highway 50 is incredibly congested. The draft EIR should evaluate the impacts on travel times and air pollution due to the additional traffic. The draft EIR should fully mitigate any adverse traffic impacts on Highway 50 and Hazel Avenue, so that the existing traffic situation does not become worse.

AIR POLLUTION

Locating a 200,000 square foot facility and the associated 600 vehicles for the employees of the facility will generate significant amounts of air pollution with an area that has been preserved as a nature and recreational area and currently has a zero carbon footprint.

The draft EIR should evaluate the impact of air pollution on the wildlife, nature and habitat, and the surrounding residents.

HEAT AND GLARE

The EIR / EIS should examine, evaluate and fully mitigate any increased heat resulting from the un-greening of the nature areas surrounding the homes including any buildings, exterior surface materials and parking area paving. Further any reflection or glare caused or generated by the proposed JOC, building and glass, to include the vehicle windshields should be fully mitigated and completely eliminated.

GROUNDWATER AND TOXIC POLLUTION

There is well documented and known pollution of soil and groundwater directly underneath the proposed JOC site. The contaminants and toxins have been fully documented and are contained and identified on the United States Environmental Protection Agency, Region 9 website, commonly known as the Aerojet General Corporation, Superfund Site, EPA #: CAD980358832 (Located here: <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/vwsoalphabetic/Aerojet+General+Corp.?OpenDocument#repositories>).

The chemicals, contaminants and toxins contained in the groundwater and soil at the proposed site pose a real threat to human health and safety, and a threat to the nature, environment and wildlife in the area.

I am concerned that construction at the proposed JOC site will disrupt the soil and ground materials that possibly contain these chemicals, contaminants and toxins to include freeing airborne vapors. Further, construction on this site will disrupt the underground toxic pollution and potentially cause the plume to become exposed, or to move underground causing further contamination to both the site, and surrounding areas which will have impacts on humans in the Gold River and Fair Oaks communities, the natural, environmental and wildlife habitats.

The EIR / EIS should fully examine and evaluate all impacts of the chemicals, toxins and contaminants contained on, and immediately adjacent to the proposed site, and more specifically all impacts that disruption of these could cause as a result of construction at the site.

These impacts must be fully mitigated.

RATTLESNAKE HABITAT

The proposed site is habitat to rattlesnakes. Disrupting this habitat will cause the migration of the rattlesnakes to nearby property such as the homes adjacent to the construction area, and into the parkway and bike trail areas. Multiple examples exist of instances where rattlesnakes have entered dwellings and backyard areas and have bitten people and domestic animals as a result of the current Hazel Avenue widening project. Disruption and construction activities on the proposed site will likely disturb and cause rattlesnakes in the area to move into back yards and residential housing areas adjacent to the proposed site. This would cause significant hazards and risks to people living in these homes, and people using the bike trail and parkway from encounters with poisonous snakes.

The EIR / EIS should fully mitigate these risks and hazards.

RATS AND RODENTS

As with the rattlesnakes, the disruption of the proposed site due to construction is likely to cause a movement of rats and rodents within the proposed site area into the residential, parkway and bike trail area. These rats and rodents commonly can carry disease creating increased exposure to the residents living adjacent and nearby the site, including bike trail and parkway users.

The EIR / EIS should fully mitigate these risks and hazards both the rat and rodent encroachment and infestation to include all potential risks of disease and damage to dwellings.

AMERICAN RIVER PARKWAY

The proposed JOC site, as federal land, is not within the official American River Parkway, but anyone on the ground would not know that – this undeveloped site appears to be part of the American River Parkway and is one of the last remaining urban greenbelts in Sacramento County near the American river parkway.

Siting the JOC on this proposed site will interfere with the use and enjoyment levels of the parkway users by locating a number of large buildings, fences for security, and a large parking lot next to the bike trail – so the bike trail would go between the Fish and Game facility (on the south side of the trail) and the JOC – creating a congested urban development in a parkway-floodway area that is largely undeveloped. This will result in the ‘un-greening’ of this area and the permanent elimination of an urban greenbelt.

The EIR/EIS should describe the impact on parkway users, nearby homeowners and neighborhoods on both sides of the river, the visual impacts of large buildings, antennas, power lines, parking lots – and noise and air pollution.

AMERICAN RIVER PARKWAY AND STATE PLAN

The City and County of Sacramento have adopted the Sacramento County American River Parkway Plan, 2008 (hereinafter PLAN). This PLAN establishes protections, guidelines and standards for development on, in and near the American River Parkway.

In 1977, the State of California Resources Agency finalized the State wild and scenic river management plan for the lower American River. The lower American River Waterway Management Plan incorporated the Parkway Plan adopted by the Sacramento County Board of Supervisors in April 1976 and the Sacramento City Council in September 1975. In his transmittal letter to the Governor, the Secretary of Resources noted that this management plan was “the second in a series of plans being developed for California’s Wild and Scenic Rivers.” He then further noted: The basic thrust of the lower American River plan is to give State support and concurrence in the plans which have been adopted and are being implemented by the City and County of Sacramento. The plans by the City and County provided the basis for the State’s plan and have been made an integral part of the State’s plan.

The EIR / EIS should evaluate the proposed JOC in the context of the American River Parkway Plan, and the State’s American River Waterway Management Plan. The EIR / EIS should fully mitigate any and all impacts the JOC might have in relation to the county and state plans.

FEDERAL AND STATE WILD AND SCENIC RIVERS ACT

The 23 miles of the American River below the Nimbus Dam to the confluence of the Sacramento River has been designated under both Federal and State law as a Wild and Scenic River under the Wild and Scenic Rivers Act. There are prohibitions, restrictions, limitations and guidelines under both the State and Federal WSRAs governing development on, in and adjacent to designated Wild and Scenic Rivers, all of which should be evaluated and examined in the EIR /EIS and the project should be in full compliance with each of these Acts.

The EIR / EIS should fully mitigate any impacts on all areas covered by these Acts and their related laws.

WILDLIFE

The draft EIR should evaluate the impact on wildlife and their habitat in the immediate site area,

and to include impacts on the wildlife corridor that stretches from the confluence of the American and Sacramento Rivers to Nimbus Dam, to Folsom Dam, and then to the upper river canyons into the Sierra. There are three identified 'threatened' species whose habitat include to proposed site location and the immediately surrounding area. These are the Swainson Hawk, Valley Elderberry Longhorn Beetle and the Black Sparrow. Additionally, the impact on all other animal species that inhabit the site and surrounding area should be considered.

The EIR/EIS should describe the impact on each of the animal species and their habitat. The EIR/EIS should further fully mitigate all impacts on these animal species and their habitat.

FOOD SERVICE

One of the selection criteria for a site was that it would be near restaurants. There are no restaurants within a half-mile; probably the outside distance JOC employees would walk. About 7/10 of a mile away are a Starbucks, a McDonald's and a Taco Bell. Because they likely would not walk, this impacts traffic, noise and pollution in the area.

This site does not appear to meet the "restaurant" selection criteria.

ALTERNATIVE LOCATIONS

The bureau and the department should evaluate alternative sites that are consistent with the siting criteria and lend themselves to fitting the usage described, such as a high security environment, and office or business zoning. Mather or McClellan business parks should specifically be considered in addition to other sites including locating near the Governor's Office of Emergency Services (OES) headquarters.

Thank you for allowing us to comment.

Sincerely,

[REDACTED]
Jon Wroten

[REDACTED]
Barbara Wroten