

# ***SECTION 4.0***

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## ***ENVIRONMENTAL CONSEQUENCES***

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### 4.1 INTRODUCTION

In this section, environmental consequences are described for the project Alternatives. Resource areas that are analyzed in this section include direct and indirect impacts to:

Section	Resource Area/Issue
4.2	Geology and Soils
4.3	Water Resources
4.4	Air Quality
4.5	Biological Resources
4.6	Cultural and Paleontological Resources
4.7	Socioeconomic Conditions
4.8	Transportation/Circulation
4.9	Land Use
4.10	Public Services
4.11	Noise
4.12	Hazardous Materials
4.13	Aesthetics
4.14	Indirect and Growth-Inducing Effects
4.15	Cumulative Effects

Direct impacts are those that are caused by the action and occur at the same time and place, while indirect impacts are caused by the action and occur later in time or further in distance, but are still reasonably foreseeable (Council on Environmental Quality (CEQ), Regulation 1508.8). Indirect and growth-inducing effects of the Alternatives to each resource area are assessed in **Section 4.14**, and cumulative effects are assessed in **Section 4.15**. Note that, consistent with the CEQ’s National Environmental Policy Act (NEPA) Regulations Section 1508.8, the term “effects” is used synonymously with the term “impacts.”

## 4.2 GEOLOGY AND SOILS

This section identifies and analyzes the direct effects associated with geology and soils that would result from the development of each alternative (described in **Section 2.0**) to determine if construction or operation would result in direct significant impacts to the proposed site topography, soils, or mineral resources, or if geological hazards associated with the existing setting would pose limitations to the development of each alternative. Effects are measured against the environmental baseline presented in **Section 3.2**. Cumulative and indirect effects are identified in **Section 4.15** and **Section 4.14**, respectively. Measures to mitigate for significant effects identified in this section are presented in **Section 5.2**.

### 4.2.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Site Topography

Alternative A would involve grading on the northern portion of the Twin Cities site. Topographic features of the development area would be altered by earthwork. The preliminary Grading and Drainage Plan for Alternative A is included in **Appendix J**. Grading would consist primarily of excavating soil for some project components and filling for building pads. Construction of Alternative A would require approximately 640,000 cubic yards of fill to raise the development area so that stormwater runoff can drain by gravity (**Section 4.3**) and create a level building pad. Approximately 16,000 cubic yards of fill would likely be available from excavation of the proposed stormwater drainage basins located in the development area and the remaining fill would be excavated from other locations on the Twin Cities site. Therefore, an additional 624,000 cubic yards of soil material would need to be excavated from other locations on the Twin Cities site, which is not anticipated to result in significant impacts to geology, air quality, biological resources, or other areas. Alternatively, soil could be imported from on-site locations near to the development portions of the project site.

The site is generally flat and does not contain any distinctive topographical features. On-site grading would facilitate proper drainage. Development of Alternative A, given the proposed design (**Section 2.2.5**), would result in a minimal impact on topography. No significant effect to topography on the Twin Cities site would occur under Alternative A and no mitigation is required.

#### Soils and Geology

The development of Alternative A could impact soils causing soil erosion during construction activities. Construction activities such as clearing, grading, trenching, and backfilling could reduce the integrity of the soil structures, thereby increasing the likelihood of erosion from wind and/or stormwater runoff. The majorities of the soils on the Twin Cities site have moderate erosion potential based on soil type and slope gradient (**Table 3.2-2** in **Section 3.2.1**), and low concrete corrosivity, making them suitable for the proposed construction.

Sediment and erosion discharge into navigable (surface) waters of the U.S. is prohibited by the Federal Clean Water Act (CWA) (1972, with modifications in 1977, 1981, and 1987), which establishes water quality goals for sediment control and erosion prevention. Laguna Creek, an identified waterway, is located along the northern boundary of the Twin Cities site. One of the mechanisms for achieving the goals of the CWA is the National Pollutant Discharge Elimination System (NPDES) permitting program, administered by the United States Environmental Protection Agency (USEPA). As part of the NPDES General Construction permit, which will be obtained prior to project construction, a Stormwater Pollution Prevention Plan (SWPPP) must be prepared and implemented. The SWPPP must make provisions for erosion prevention and sediment control and control of other potential pollutants. Alternative A construction would be pursuant to a NPDES permit (**Section 2.2.5**).

As such, the design and construction of Alternative A, through adherence to the NPDES permit, would not significantly affect soils or create erosion or sedimentation issues on the Twin Cities site.

Mitigation has been included in **Section 5.2** to ensure appropriate measures and best management practices (BMPs) are incorporated into the site specific SWPPP. With incorporation of the mitigation, effects from construction of Alternative A on soils and geology would be further minimized.

### **Seismicity**

As discussed in **Section 3.2.1**, there are no known active faults in the vicinity of the Twin Cities site. The Twin Cities site does not fall within an Alquist-Priolo Fault Zone and the site is therefore not subject to any building restrictions. As discussed in **Section 2.2.5**, the casino and related facilities under Alternative A would be constructed to standards consistent with the International Building Code (IBC) guidelines, particularly those pertaining to earthquake design, in order to safeguard against major structural failures and loss of life. Development of Alternative A would have no significant effects related to seismic hazards. No mitigation is required.

### **Mineral Resources**

Given there are no known or recorded mineral resources within the Twin Cities Site, construction and operation of Alternative A would not adversely affect known or recorded mineral resources. No significant impacts to mineral resources would occur under Alternative A and no mitigation is required.

## **4.2.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

### **Site Topography**

As with Alternative A, Alternative B would involve grading in the northern portion of the Twin Cities site. As discussed in the preliminary Grading and Drainage Plan (**Appendix J**), on-site grading would require approximately 300,000 cubic yards of fill so that stormwater runoff can drain by gravity (**Section 4.3**). As with Alternative A, approximately 16,000 cubic yards of fill would be available from the excavation

of the detention basins (**Appendix J**). Therefore, an additional 284,000 cubic yards of soil material would need to be excavated from other locations on the Twin Cities site or imported from off-site under Alternative B.

The site is generally flat and does not contain any distinctive topographical features. Some cut-and-fill slopes might be noticeable from the development of Alternative B. Given the proposed design (**Section 2.3.1**) and the existing topography, the impact to topography would be minimal. No significant effects to topography would occur and no mitigation is required.

### **Soils and Geology**

Given that Alternative B is a reduced intensity development on the same development area of the Twin Cities site as Alternative A, potential impacts to soil due to erosion during construction of Alternative B are similar to those associated with Alternative A. As with Alternative A, Alternative B would be constructed in association with a NPDES permit from the USEPA for sediment control and erosion prevention into navigable (surface) waters of the U.S.

The design and construction of Alternative B, through adherence to the NPDES permit, would not significantly affect soils on the Twin Cities site. The mitigation included in **Section 5.2** outlines measures and BMPs that would be included as a part of the SWPPP. With incorporation of the mitigation, effects from construction of Alternative B on soils and geology would be further minimized.

### **Seismicity**

The on-site geological conditions on the Twin Cities site under Alternative B are the same as for Alternative A. Project-related impacts from seismicity with the implementation of Alternative B would also have no significant effects related to seismic hazards. No mitigation is required.

### **Mineral Resources**

Mineral resources on the Twin Cities site associated with Alternative B are the same as for Alternative A. No significant project related impacts to mineral resources would occur with implementation of Alternative B. No mitigation is required.

## **4.2.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

### **Site Topography**

As with Alternatives A and B, Alternative C would involve grading in the northern portion of the Twin Cities site. As discussed in the preliminary Grading and Drainage Plan (**Appendix J**), on-site grading would require approximately 270,000 cubic yards of fill so that stormwater runoff can drain by gravity (**Section 4.3**). As with Alternative A and B, approximately 16,000 cubic yards of fill would be available

from the excavation of the detention basins (**Appendix J**). Therefore, an additional 254,000 cubic yards of soil material would need to be excavated from other locations on the Twin Cities site or imported from off-site under Alternative C.

The site is generally flat and does not contain any distinctive topographical features. Some cut-and-fill slopes might be noticeable from the development of Alternative C. Given the project design (**Section 2.2.4.1**) and the existing topography, the impact to topography would be minimal. No significant effects to topography would occur and no mitigation is required.

### **Soils and Geology**

Given that Alternative C is a reduced intensity development on the same development area of the Twin Cities site as Alternatives A and B, potential impacts to soil due to erosion during construction of Alternative C are similar to those associated with Alternatives A and B. As with Alternatives A and B, Alternative C would be constructed in association with a NPDES permit from the USEPA for sediment control and erosion prevention into navigable (surface) waters of the U.S.

The design and construction of Alternative C would not significantly affect soils on the Twin Cities site. The mitigation included in **Section 5.2** outlines measures and BMPs that would be included as a part of the SWPPP. With incorporation of the mitigation, effects from construction of Alternative B on soils and geology would be further minimized.

### **Seismicity**

The on-site geological conditions on the Twin Cities site for Alternative C are the same as for Alternatives A and B. Project-related impacts from seismicity with the implementation of Alternative C would also have no adverse effects related to seismic hazards. No mitigation is required.

### **Mineral Resources**

Mineral resources on the Twin Cities site associated with Alternative C are the same as for Alternatives A and B. No significant project-related impacts to mineral resources would occur with implementation of Alternative C. No mitigation is required.

## **4.2.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE**

### **Site Topography**

Alternative D would involve grading as part of construction activities associated with the casino development on the 75-acre Historic Rancheria site. Extensive earthwork would occur under Alternative D due to the project location in a Federal Emergency Management Agency (FEMA) designated floodplain. The preliminary design of Alternative D includes raising the base grade under the structure

above FEMA base flood evaluation levels. In addition, to offset flood storage and contain and treat stormwater, 6 acre-foot and 122 acre-foot detention basins would be developed on the site. As discussed in **Section 2.5.2** and detailed in **Appendix I**, due to the size of the stormwater basins, cut and fill of Alternative D would be balanced on-site. Alternative D would require approximately 176,000 cubic yards of fill to raise the development area above the base flood elevation. This would be offset by approximately 194,000 cubic yards of excavated soil from the stormwater basins.

Development of Alternative D would not impact the structural integrity of the existing levee along the southern boundary of the Cosumnes River as the construction area, including the stormwater basins, would be set back from the southern toe of the levee. Site grading would not result in significant slope stability or landform impacts, given the Historic Rancheria site's gentle topography and the fact that the construction area will be leveled prior to site development. The general topography of the site would not be adversely affected. Potential impacts to topography under Alternative D would be less than significant.

### **Soils and Geology**

Construction of Alternative D could adversely impact soils due to erosion during construction activities, such as clearing, grading, trenching, and backfilling. The majority of the soils on the Historic Rancheria site have a moderate to severe erosion susceptibility based on soil type (**Table 3.2-4** in **Section 3.2.2**), and low concrete corrosivity, making them suitable for the proposed construction. As with Alternatives A through C, Alternative D would adhere to a NPDES permit from the USEPA for sediment control and erosion.

The design and construction of Alternative D would not significantly affect soils on the Historic Rancheria site. The mitigation included in **Section 5.2** outlines measures and BMPs that would be included as a part of the SWPPP. With incorporation of the mitigation, effects from construction of Alternative D on soils and geology would be further minimized.

### **Seismicity**

As discussed in **Section 3.2.2**, there are no known active faults occur in the vicinity of the Historic Rancheria site. The Historic Rancheria site does not fall within an Alquist-Priolo Fault Zone and is therefore not subject to any building restrictions. As discussed in **Section 2.5.2**, the casino and related facilities under Alternative D would be constructed to standards consistent with the IBC guidelines. Development of Alternative D would have no significant effects related to seismic hazards. No mitigation is required.

## **Mineral Resources**

Given there are no known or recorded mineral resources within the Historic Rancherías site, construction and operation of Alternative D would not adversely affect known or recorded mineral resources. No significant impacts to mineral resources would occur under Alternative D and no mitigation is required.

### **4.2.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE** **Site Topography**

As with Alternative D, Alternative E would involve grading as part of construction activities associated with the casino development on the 75-acre Historic Rancheria site. Extensive earthwork would occur under Alternative D due to the project location in a floodplain and the preliminary design, which includes raising the grade under the structure above base flood evaluation levels. In addition, to offset flood storage and contain and treat stormwater, 6 acre-foot and 104 acre-foot detention basins will be developed on the site. As discussed in **Section 2.6.1** and detailed in **Appendix I**, due to the size of the basins, cut and fill of Alternative E would be balanced on site. Alternative D would require approximately 143,000 cubic yards of fill to raise the development area above the base flood elevation. This would be offset by approximately 158,000 cubic yards of excavated soil from the stormwater basins.

As with Alternative D, the development of Alternative E would not impact the existing levee along the southern boundary of the Cosumnes River as the construction area, including the stormwater basins, would be set back from the toe of the levee. Site grading would not result in significant slope stability or landform impacts, given the site's gentle topography and the fact that the construction area will be leveled prior to site development. The general topography of the site would not be adversely affected. Potential impacts to topography under Alternative E would be less than significant.

## **Soils and Geology**

As with Alternative D, the construction of Alternative E could adversely impact soils due to erosion during construction activities, such as clearing, grading, trenching, and backfilling. The majority of the soils on the Historic Rancheria site have a moderate to severe erosion susceptibility based on soil type (**Table 3.2-4** in **Section 3.2.2**). As with Alternatives A through D, Alternative E would adhere to a NPDES permit from the USEPA for sediment control and erosion.

The design and construction of Alternative E would not significantly affect soils on the Historic Rancheria site. The mitigation included in **Section 5.2** outlines measures and BMPs that would be included as a part of the SWPPP. With incorporation of the mitigation, effects from construction of Alternative E on soils and geology would be further minimized.

## **Seismicity**

The on-site geological conditions on the Historic Rancheria site for Alternative E are the same as for Alternative D. Project-related impacts from seismicity with the implementation of Alternative E would also have no significant effects related to seismic hazards. No mitigation is required.

## **Mineral Resources**

Mineral resources on the Historic Rancheria site associated with Alternative E are the same as for Alternative D. No significant project-related impacts to mineral resources would occur with implementation of Alternative E. No mitigation is required.

### **4.2.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

#### **Site Topography**

The approximate 36-acre City of Elk Grove Mall site (Mall site) is a partially developed retail/commercial facility. The partially developed retail project, previously approved by the City of Elk Grove, includes parking lots, major utilities, and partially constructed buildings. The Mall site is relatively flat with little differentiation in topography. Due to the previous site improvements, the proposed development of Alternative F would result in limited grading and drainage improvements. Limited grading would be required to level the existing ground and tie into existing utilities. Approximately 7,000 cubic yards of fill would be necessary to construct Alternative F. Fill material would be imported to the site (**Appendix J**).

Given the Mall site is already partially developed and contains no distinctive topographical features and minimal site improvements would be made on-site, the impact of Alternative F on site topography would be less than significant. No mitigation is required.

#### **Soils and Geology**

Construction of Alternative F could adversely impact soils due to erosion during construction activities, such as clearing, grading, trenching, and backfilling. The majority of the soils on the Mall site have a moderately-severe to severe erosion susceptibility based on soil type (**Table 3.2-5** in **Section 3.2.3**). As with Alternatives A through E, Alternative F would adhere to a NPDES permit from the USEPA for sediment control and erosion.

The design and construction of Alternative F would not significantly affect soils on the Mall site. The mitigation included in **Section 5.2** outlines measures and BMPs that would be included as a part of the SWPPP. With incorporation of the mitigation, effects from construction of Alternative F on soils and geology would be further minimized.

## **Seismicity**

As discussed in **Section 3.2.3**, there are no known active faults in the vicinity of the Mall site. The Mall site does not fall within an Alquist-Priolo Fault Zone and is therefore not subject to any building restrictions. As discussed in **Section 2.7.2**, the casino and related facilities under Alternative F would be constructed consistent with IBC guidelines, particularly those pertaining to earthquake design, in order to safeguard against major structural failures and loss of life. Development of Alternative F would have no adverse effects related to seismic hazards. No mitigation is required.

## **Mineral Resources**

Given there are no known or recorded mineral resources within the Mall site, construction and operation of Alternative F would not adversely affect known or recorded mineral resources. No significant impacts to mineral resources would occur under Alternative F, and no mitigation is required.

### **4.2.7 ALTERNATIVE G – NO ACTION**

Under the No Action alternative, no development would occur on the Twin Cities site or the Historic Wilton Rancheria site in the near-term. These two sites would remain as they currently exist as described in **Section 3.0**. Topographic features and soils would remain undisturbed. No landform, soil, seismic, or mineral effects would occur as a result of the No Action/No Development Alternative for these two sites. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses and similar landform, soil, seismic, or mineral effects would occur as with Alternative F as a result of the No Action/No Development Alternative.

## 4.3 WATER RESOURCES

This section assesses the significance of the direct effects to water resources anticipated to result from the development of each alternative described in **Section 2.0**. Adverse effects to surface water resources would result if either construction or operation would substantially alter, impede, or degrade drainage patterns, floodplain management, and/or water quality. Adverse effects to groundwater resources would result if either construction or operation would substantially decrease groundwater levels, reduce or impede groundwater recharge, and/or degrade groundwater quality. Effects are measured against the environmental baseline presented in **Section 3.3**. Indirect effects associated with off-site construction and growth-inducement are identified in **Section 4.14**. Cumulative effects are identified in **Section 4.15**. Measures to mitigate for potentially adverse effects identified in this section are presented in **Section 5.2** and **Section 5.3**.

### 4.3.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Surface Water

##### *Flooding*

As noted in **Section 3.3.1**, a small portion of the Twin Cities site, along Laguna Creek, is within the 100-year floodplain. However, the proposed development footprint of Alternative A is entirely located entirely outside the Federal Emergency Management Agency (FEMA) designated 100-year and 500-year floodplains. No associated structures, utility, or storage areas are proposed for development within the 100-year and 500-year floodplains on the Twin Cities site.

Should on-site wastewater treatment occur, the wastewater treatment plant (WWTP) and disposal systems would be located outside of the 100-year and 500-year floodplains. Sprayfields would be used to dispose of treated effluent and would not be operated during flood events. Thus, the operation of on-site wastewater treatment facilities would not significantly impact flooding.

No significant flooding impacts would occur as a result of Alternative A. Because no development would be located within the floodplain, Alternative A is in compliance with Executive Order (EO) 13690.

##### *Construction Impacts*

Construction activities under Alternative A would include ground-disturbing activities such as clearing and grubbing, mass grading, and excavation, which could lead to erosion of topsoil. Erosion from construction could increase sediment discharge to surface waters during storm events thereby degrading downstream water quality. Construction activities, typical of other development projects, would also include the routine use of potentially hazardous construction materials such as concrete washings, solvents, paint, oil, and grease, which may spill onto the ground and be picked up by stormwater. Discharges of pollutants to surface waters from construction activities and accidents are a potentially significant impact.

As discussed in **Section 2.2.5**, and further analyzed in **Section 4.2.1**, erosion control measures will be employed in compliance with the Phase I National Pollutant Discharge Elimination System (NPDES) General Construction Permit for construction activities. A Stormwater Pollution Prevention Plan (SWPPP) will be developed prior to any ground disturbance and would include Best Management Practices (BMPs) to reduce potential surface water contamination during storm events. Implementation of mitigation measures presented in **Section 5.2** and the BMPs incorporated into the SWPPP would reduce or prevent adverse effects to the local and regional watershed from construction activities on the Twin Cities site. Therefore, after mitigation, Alternative A would not result in a significant adverse effect on water quality.

### ***Stormwater Runoff***

Implementation of Alternative A would alter the existing drainage pattern of the Twin Cities site and increase stormwater runoff as a result of increased impervious surfaces in the northern portion of the site. This increase in impervious surfaces could impact the quantity and quality of stormwater runoff. Alternative A would convert approximately 63.4 acres of the agricultural parcels into a hotel and casino complex, surface roads, and parking areas, which would result in an increase in stormwater runoff over pre-development rates during 10- and 100-year storm events (**Appendix J**).

Due to the increase in surface water runoff, two stormwater detention basins are included in the project design for Alternative A. As described in the Grading and Drainage Feasibility Study, provided in **Appendix J**, the stormwater detention ponds would be approximately 3 feet deep with an approximate bottom elevation of 40 feet above mean sea level (msl). The southern detention basin is designed with an 8 acre-feet (af) capacity, and the northern detention basin is designed with a 3 af capacity. These detention basins are sized to offset the increase in runoff (from the 85<sup>th</sup> percentile storm) and would have metered outlets to control the rate of discharge. The basins would discharge to vegetated swales and level spreaders that would release runoff via overland flow into Laguna Creek.

The existing man-made ditch (Drainage 2) is proposed to be rerouted into a new storm drain culvert that will connect to a section of the existing ditch along the western border of the Twin Cities site (**Figure 3.5-1**). This culvert will route existing off-site flows (from Highway 99 and east of the Twin Cities site) through the Twin Cities site (**Appendix J**).

Internal parking lots would have a series of drain inlets and vegetated bioswales that would be connected to the storm drain conveyance system. The conveyance pipes would be sized to convey 100-year storm event flow, and would be routed to either the detention basins or the culvert that is proposed to run underneath the site. Runoff from buildings would be collected via roof leaders directly connected to storm drain conveyance pipes. Fill would be incorporated into site design to allow stormwater runoff from the proposed improvements to drain via gravity.

If not treated properly prior to discharge, stormwater runoff has the potential to significantly impact surface water quality. The Alternative A design includes various features to improve stormwater quality, as described above, and would ensure protection of surface water quality, along with erosion control measures listed in **Section 5.2**. Accordingly, the implementation of Alternative A would not result in significant adverse effects to stormwater runoff.

## **Wastewater**

The projected average daily wastewater flow for Alternative A would be approximately 231,000 gallons per day (gpd) with peak flows estimated at 308,000 gpd (**Appendix I**). As discussed in **Section 2.2**, Alternative A has two wastewater treatment and disposal options: On-site (Option 1) and Off-site (Option 2).

### ***Option 1 (On-Site Treatment and Disposal)***

Under Wastewater Option 1, wastewater would be treated by an on-site WWTP, located northwest of the casino and hotel structures. Tertiary treated reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation. The proposed WWTP is described in **Section 2.2** and detailed in **Appendix I**.

Excess treated effluent may be discharged via sub-surface disposal or a combination of spray disposal and sub-surface disposal. These on-site disposal options are detailed in **Section 2.2.5** and **Appendix I**. Percolation testing and soil evaluations would be needed before finalizing the design and sizing of the subsurface system, but, even with a very conservative assumptions of soil suitability, the subsurface areas listed in **Appendix I** are sufficient for disposal. Based on soil types and percolation rates, appropriate wastewater application rates would be set. For example, the application rate for the soils with high clay content according to Sacramento County Code (Section 6.32.340) is 0.2 gpd/square foot. With this assumed application rate, the disposal area would need to be approximately 36.2 acres, if sized for peak daily flow. Because the Twin Cities site has over 80 acres of land that could be potentially be used for wastewater disposal, there would be sufficient area (see **Appendix I**).

Uncontrolled discharge of treated wastewater could indirectly affect surface water and groundwater quality. However, as discussed in **Section 2.2.5**, the proposed WWTP, including either of the selected disposal options, would meet the U.S. Environmental Protection Agency (USEPA) wastewater disposal criteria (USEPA Underground Injection Control (UIC) program for Tribal land). Tertiary treated wastewater would additionally meet water quality standards in the California Department of Health Services' (DHS) regulations under Title 22, Division 4, Chapter 3, of the California Administrative Code. If subsurface disposal is utilized, the selected leach field area would have adequate percolation and appropriate clearance above the highest groundwater levels. If on-site sprayfields are utilized, effluent would be applied at agronomic rates throughout the year, except during rain events. Accordingly, the treated effluent from the on-site WWTP would not adversely impact surface water or groundwater

quality. Nonetheless, mitigation measures have been included in **Section 5.3.1** that would further reduce impacts from wastewater.

### ***Option 2 (Off-Site Treatment and Disposal)***

Under Wastewater Option 2, wastewater treatment and disposal would be provided by the City of Galt (City) through connection to the City's sewer system. Wastewater at the City WWTP is treated and discharged in compliance with a Regional Water Quality Control Board (RWQCB) NPDES permit to ensure that water quality is adequately protected. No adverse effects to surface water or groundwater quality would occur through connection to the existing City system and continued compliance with the NPDES discharge permit. The impacts to public utilities providers are further discussed in **Section 4.10**.

## **Groundwater**

### ***Groundwater Supply***

As discussed in **Section 2.2.5**, Alternative A has two domestic water supply options: on-site water supply (Option 1) and off-site water supply (Option 2). The estimated average daily water consumption (including landscaping and irrigation) for Alternative A would be approximately 295,000 gallons per day (gpd) (**Appendix I**). Should an on-site WWTP be developed (as described in **Section 2.2.5**), recycled water would be used for indoor non-potable uses and for landscaping, reducing the peak day demand. Water required for construction would be supplied via existing on-site agricultural wells. This temporary use would be negligible and would be offset by reduced agricultural water use.

#### ***On-Site Water Supply (Option 1)***

Alternative A Water Supply Option 1 would involve the development and use of on-site groundwater wells for domestic use, emergency supply, and fire protection. This system is described in **Section 2.2.5** and detailed in **Appendix I**. Approximately 720,000 gallons of fire protection storage is anticipated to provide the minimum required fire flow. This demand may be met with either potable or recycled water; if recycled water is to be used, fire protection storage must be separate from potable water storage. See **Appendix I** for storage tank sizing.

The use of groundwater as the water supply for Alternative A could significantly impact groundwater resources if use resulted in an overdraft of the Cosumnes Subbasin underlying the Twin Cities site and off-site vicinity. As discussed in **Section 3.3.1**, existing agriculture operations on the Twin Cities site pump groundwater for irrigation at an estimated rate of 747 acre feet per year (ac-ft/yr). Pumping would occur primarily during the irrigation season (June through September) (**Appendix K**).

Alternative A would use approximately 331 ac-ft/yr (or 295,000 gpd on annual average basis) during operation of the casino/hotel development (**Appendix K**). Implementation of the project may also include continued irrigation of a portion of the existing agricultural lands. This may account for an additional 249 ac-ft/yr of water demand for a total of 580 ac-ft/yr for agriculture, operational use, and for

landscape irrigation. Therefore, compared to existing agricultural operations, the construction and operation of Alternative A would reduce the volume of groundwater extracted from the aquifer by 23 percent. Much of the reduction would occur during the dry season when aquifer recharge is typically lowest. Additionally, a majority of the water used during operation of Alternative A would be treated at an on-site WWTP or at the Galt WWTP, located west of the Twin Cities Site and in part returned to the aquifer or nearby surface waterways. Given the project design of Alternative A and the fact that the development of Alternative A would use less water than is currently utilized for agriculture irrigation, a minimal and less than significant effect to neighboring wells from on-site groundwater pumping would occur, and Alternative A would not decrease groundwater levels. Construction of Alternative A would not cause significant impacts to groundwater resources. In fact it would lessen the current site's water usage due to the retirement of some agricultural land on the property. Therefore, Alternative A would lessen the magnitude of the localized groundwater drawdown. Nonetheless, mitigation measures to further reduce groundwater consumption are provided in **Section 5.3.2**.

#### *Off-Site Water Supply (Option 2)*

Alternative A Water Supply Option 2 would not require the use of on-site groundwater wells, as water would be provided through a connection to the City's municipal water system, pursuant to a service agreement with the City. Through the connection to the City water supply system, a less than significant effect to neighboring wells would occur and Alternative A would not decrease groundwater levels. Water demanded could be reduced by using recycled water provided by the City's WWTP. Nonetheless, mitigation measures to reduce groundwater consumption are provided in **Section 5.3.2**. The impacts to public utilities providers associated with Water Supply Option 2 are discussed in **Section 4.10**.

#### **Groundwater Recharge**

The conversion of agricultural land to commercial uses introduces large areas of impermeable surfaces such as the casino, hotel, paved parking lots, and new roads. The introduction of these surfaces can reduce groundwater recharge in areas where surface percolation accounts for a large percentage of natural recharge. Although the development of Alternative A would introduce approximately 63 acres of impermeable surfaces, the development of detention ponds for treating and storing stormwater runoff on-site would allow collected stormwater to percolate into the groundwater table. If on-site treated effluent sprayfields and/or leach fields are constructed, they would also contribute to groundwater recharge. Therefore, the introduction of impermeable surfaces on the Twin Cities site under Alternative A would not have a significant adverse impact on groundwater recharge. No mitigation is warranted.

#### **Groundwater Quality**

The construction of Alternative A, similar to other development projects, would include the routine use of potentially hazardous construction materials such as concrete washings, solvents, paint, oil, and grease, which may spill onto the ground and enter stormwater. These pollutants may percolate to shallow groundwater from construction activities and cause a potentially significant impact. The mitigation

measures in **Section 5.2** and **Section 5.3.2** would prevent groundwater pollution during construction and reduce potential impacts to groundwater quality from construction to a less than significant level.

During project operation, runoff from Alternative A facilities could flush trash, debris, oil, sediment, and grease that accumulate on pavement and other impervious surfaces into stormwater runoff. Fertilizers used in landscaped areas could also enter stormwater if over-applied. As noted in the Grading and Drainage Feasibility Study (**Appendix J**) and **Section 2.2.5**, several features designed to filter surface runoff have been incorporated into the project design. These features include stormwater detention basins to remove suspended solids, such as trash and sediment, and the use of vegetated swales, which would provide filtration for stormwater by capturing sediment and pollutants within vegetation and the surface soil matrix, thereby adequately filtering stormwater before it percolates to the groundwater table. Thus, given the project design and mitigation, the impact to groundwater quality from stormwater runoff would be less than significant under Alternative A.

### **4.3.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

#### **Surface Water**

##### ***Flooding***

As noted in **Section 3.3.1**, the northern portion of the Twin Cities site along Laguna Creek is within the 100-year floodplain. However, as with Alternative A, the proposed development footprint of Alternative B is located entirely outside the FEMA 100-year and 500-year floodplains. No associated structures, utility, wastewater treatment and disposal systems, or storage areas are proposed for development within the 100-year and 500-year floodplains on the Twin Cities site. No significant flooding impacts would occur as a result of Alternative B, and no development is proposed within the floodplain; therefore, the development would be in compliance with EO 13690.

##### ***Construction Impacts***

Construction of Alternative B, located in the same development area on the Twin Cities site, would be similar to that of Alternative A and could result in sediment erosion, off-site movement of hazardous materials and pollutants, and impacts to surface water and groundwater quality.

As discussed in **Section 4.2.1** and **Section 2.3.1**, erosion control measures will be employed in compliance with the Phase I NPDES General Construction Permit for construction activities. A site-specific SWPPP will be developed prior to any ground disturbance at the Twin Cities site and will include BMPs to reduce potential surface water contamination during storm events. Implementation of mitigation measures presented in **Section 5.2** and the BMPs incorporated into the SWPPP would reduce or prevent adverse effects to the local and regional watershed from construction activities on the Twin Cities site. Therefore, after mitigation, Alternative B would not result in a significant adverse effect on water quality.

### ***Stormwater Runoff***

Impacts to surface water related to stormwater runoff as a result of the development of Alternative B would be similar to those of Alternative A as both alternatives involve the development of impervious surfaces and would be located on the same northern portion of the Twin Cities site. As with Alternative A, implementation of Alternative B would alter the existing drainage pattern and increase stormwater runoff as a result of increased impervious surfaces. This increase in impervious surfaces could impact the quantity and quality of stormwater runoff. Alternative B would convert approximately 63 acres of the agricultural property into a casino/hotel development, surface roads, and parking areas, which would result in an increase in stormwater runoff over pre-development rates during 10- and 100-year storm events (**Appendix J**).

The Grading and Drainage Feasibility Study for Alternative B is similar to that of Alternative A; refer to **Section 4.3.1** and **Appendix J**. As with Alternative A, the implementation of Alternative B would not result in significant adverse effects to surface water quality.

### **Wastewater**

As with Alternative A, wastewater generated by Alternative B would be treated and disposed of either on-site (Option 1) or off-site (Option 2). These options are described above in **Section 4.3.1** and in **Section 2.3.1**. The projected average daily wastewater flow for Alternative B would be approximately 154,000 gpd with peak flows estimated at 205,000 gpd (**Appendix I**). As with Alternative A, the treated effluent from the on-site WWTP under Wastewater Option 1 would not adversely impact surface water or groundwater quality. Additionally, under Wastewater Option 2, wastewater would be treated and discharged at the City's WWTP pursuant to an existing RWQCB NPDES permit. Therefore, no adverse effects to surface water or groundwater quality would occur under Alternative B. Nonetheless, mitigation measures have been included in **Section 5.3.1** that would further reduce impacts from wastewater.

### **Groundwater**

#### ***Groundwater Supply***

As with Alternative A, Alternative B has two water supply options: on-site water supply (Option 1) and off-site water supply (Option 2) (**Section 2.3.1**). The estimated average daily water consumption for Alternative B (including landscaping and irrigation) would be approximately 227,000 gpd (**Appendix I**). Should an on-site WWTP be developed (as described in **Section 2.3.1**), recycled water would be used for indoor non-potable uses and for landscaping, reducing the peak day demand (**Appendix I**).

#### ***On-Site Water Supply (Option 1)***

As with Alternative A Water Supply Option 1, given the project design of Alternative B and the fact that the development of Alternative B would use less water than is currently utilized for agriculture irrigation, a less than significant effect to neighboring wells from on-site groundwater pumping would occur, and

Alternative B would not decrease groundwater levels and would also lessen the impact the current site's water usage has on groundwater resources. Therefore, Alternative B would reduce water usage and corresponding impacts to groundwater. Nonetheless, mitigation measures to further reduce groundwater consumption are provided in **Section 5.3.2**.

#### *Off-Site Water Supply (Option 2)*

As with Alternative A, the development of Water Supply Option 2 would not require the use of on-site groundwater wells, as potable and irrigation water would be provided through a connection to the City's municipal water system, pursuant to a service agreement with the City. Through the connection to the City water supply system, a less than significant effect to neighboring wells would occur and Alternative B would not decrease groundwater levels. Water demand could also be reduced by using recycled water from the City's WWTP. Nonetheless, mitigation measures to reduce groundwater consumption are provided in **Section 5.3.2**. The impacts to public utilities providers associated with Water Supply Option 2 are discussed in **Section 4.10**.

#### *Groundwater Recharge*

As with Alternative A, the conversion of agricultural land to commercial uses introduces large areas of impermeable surfaces such as the casino, paved parking lots, and new roads. The introduction of these surfaces can reduce groundwater recharge in areas where surface percolation accounts for a large percentage of natural recharge. Although the development of Alternative B would introduce approximately 63 acres of impermeable surfaces, the development of detention ponds for storing stormwater runoff on-site would allow collected stormwater to percolate into the groundwater table. If on-site treated effluent sprayfields and/or leach fields are constructed, they would also contribute to groundwater recharge. Therefore, the introduction of impermeable surfaces on the Twin Cities site under Alternative B would not have a significant adverse impact on groundwater recharge. No mitigation is warranted.

#### *Groundwater Quality*

As with Alternative A, the construction activities associated with Alternative B would include the routine use of potentially hazardous materials that have the potential to percolate to shallow groundwater if accidental releases were to occur, which would constitute a potentially significant impact. The mitigation measures in **Section 5.2** and **Section 5.3.2** would prevent groundwater pollution during construction and reduce potential impacts to groundwater quality from construction to a less than significant level.

As with Alternative A, during project operation, runoff from Alternative B project facilities could flush contaminants that accumulate on pavement and other impervious surfaces into stormwater. Fertilizers used in landscaped areas could also enter stormwater if over-applied. The stormwater contained on-site within the detention basins would percolate to the shallow unconfined alluvial aquifer, and could potentially transport contaminants into the groundwater. As noted in **Section 2.3.1**, several features

designed to filter surface runoff have been incorporated into the design and are similar to those that would be included under Alternative B (refer to **Section 4.3.1** for further discussion). Thus, given the project design and mitigation, the impact to groundwater quality would be less than significant.

### **4.3.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

#### **Surface Water**

##### ***Flooding***

As noted in **Section 3.3.1**, the small northern portion of the Twin Cities site along Laguna Creek is within the FEMA 100-year floodplain. However, as with Alternatives A and B, the proposed development footprint of Alternative C is located entirely outside the FEMA 100-year and 500-year floodplains. No associated structures, utility, wastewater treatment and disposal systems, or storage areas are proposed for development within the 100-year and 500-year floodplains on the site. No significant flooding impacts would occur as a result of Alternative C, and no development is proposed within the floodplain; therefore, Alternative C is in compliance with EO 13690.

##### ***Construction Impacts***

Construction of Alternative C, located in the same development area on the Twin Cities site, would be similar to that of Alternatives A and B and could result in sediment erosion, off-site movement of hazardous materials and pollutants, and impacts to surface water and groundwater quality.

As discussed in **Section 4.2.1** and **Section 2.4.1**, erosion control measures will be employed in compliance with the Phase I NPDES General Construction Permit for construction activities during construction. A site-specific SWPPP will be developed prior to any ground disturbance on the Twin Cities site and will include BMPs to reduce potential surface water contamination during storm events. Implementation of mitigation measures presented in **Section 5.2** and the BMPs incorporated into the SWPPP would reduce or prevent adverse effects to the local and regional watershed from construction activities on the Twin Cities site. Therefore, after mitigation, Alternative C would not result in a significant adverse effect on water quality.

##### ***Stormwater Runoff***

Impacts to surface water related to stormwater runoff as a result of the development of Alternative C would be similar to those of Alternatives A and B. As with Alternatives A and B, implementation of Alternative C would alter the existing drainage pattern of the Twin Cities site and increase stormwater runoff as a result of increased impervious surfaces in the northern portion of the Twin Cities site. This increase in impervious surfaces could impact quantity and quality of stormwater runoff. Alternative C would convert approximately 59 acres of the agricultural parcels into a retail complex, surface roads, and parking areas, which would result in an increase in stormwater runoff over pre-development rates during 10- and 100-year storm events (**Appendix J**).

The Grading and Drainage Feasibility Study for Alternative C is similar to Alternatives A and B (refer to **Section 4.2.3** and **Appendix J**); however, Alternative C includes only one new discharge point north of the Twin Cities site as opposed to the two new discharge points proposed for Alternatives A and B. Implementation of Alternative C would not result in significant adverse effects to surface water quality.

## **Wastewater**

As with Alternatives A and B, wastewater generated by Alternative C would be treated and disposed of either on-site (Option 1) or off-site (Option 2), described above in **Section 4.2.3**. Refer to **Section 2.4.1** and **Appendix I** for a further description of Alternative C's wastewater options. The projected average daily wastewater flow for Alternative C would be approximately 104,000 gpd with peak flows estimated at 138,000 gpd (**Appendix I**). As with Alternative A, the treated effluent from the on-site WWTP under Wastewater Option 1 would not adversely impact surface water or groundwater quality. Additionally, under Wastewater Option 2, wastewater would be treated and discharged at the City's WWTP pursuant to an existing RWQCB NPDES permit. Therefore, no adverse effects to surface water or groundwater quality would occur under Alternative C. Nonetheless, mitigation measures have been included in **Section 5.3** that would further reduce impacts from wastewater.

## **Groundwater**

### ***Groundwater Supply***

As with Alternatives A and B, Alternative C has two water supply options: on-site water supply (Option 1) and off-site water supply (Option 2); refer to **Section 2.4.1** and **Section 4.2.3**. The estimated average daily water consumption (including landscaping and irrigation) for Alternative C would be approximately 158,000 gpd (**Appendix I**). Should an on-site WWTP be developed (as described in **Section 2.4.1**), recycled water would be used for indoor non-potable uses and for landscaping, reducing the peak day demand (**Appendix I**).

### ***On-Site Water Supply (Option 1)***

As with Alternative A Water Supply Option 1, given the project design of Alternative C and the fact that the development of Alternative C would use less water than is currently utilized for agriculture irrigation, a less than significant effect to neighboring wells from on-site groundwater pumping would occur, and Alternative C would not decrease groundwater levels and would also lessen the impact the current site's water usage has on groundwater resources. Therefore, Alternative C would lessen water usage and corresponding effects to groundwater. Nonetheless, mitigation measures to further reduce groundwater consumption are provided in **Section 5.3**.

### ***Off-Site Water Supply (Option 2)***

As with Alternative A, the development of Water Supply Option 2 would not require the use of on-site groundwater wells, as water would be provided through a connection to the City's municipal water

system, pursuant to a service agreement with the City. Through the connection to the City water supply system, a less than significant effect to neighboring wells would occur and Alternative C would not decrease groundwater levels. Water demand could be further reduced by using recycled water from the City's WWTP. Nonetheless, mitigation measures to reduce groundwater consumption are provided in **Section 5.3**. The impacts to public utilities providers associated with Water Supply Option 2 are discussed in **Section 4.10**.

### ***Groundwater Recharge***

Similar to Alternatives A and B, the conversion of agricultural land to commercial uses under Alternative C would introduce large areas of impermeable surfaces, which could reduce groundwater recharge. As discussed in **Section 2.4.1**, Alternative C would include development of stormwater detention basins sized appropriately to accommodate all stormwater runoff, which would allow for groundwater recharge at a rate consistent with pre-development. If on-site treated effluent sprayfields and/or leach fields are constructed, they would also contribute to groundwater recharge. Given the project design of Alternative C, minimal impacts related to groundwater levels would occur. No mitigation is warranted.

### ***Groundwater Quality***

As with Alternative A, the construction activities associated with Alternative C would include the routine use of potentially hazardous materials that have the potential to percolate to shallow groundwater if accidental releases were to occur, which would constitute a potentially significant impact. The mitigation measures in **Section 5.2** and **Section 5.3.2** prevent groundwater pollution during construction and reduce potential impacts to groundwater quality from construction to a less than significant level.

As with Alternative A, during project operation, runoff from Alternative C project facilities could flush contaminants that accumulate on pavement and other impervious surfaces into stormwater. Fertilizers used in landscaped areas could also enter stormwater if over-applied. The stormwater contained on-site within the detention basins would percolate to the shallow unconfined alluvial aquifer, and could potentially transport contaminants into the groundwater. As noted in **Section 2.4.1**, several features designed to filter surface runoff have been incorporated into the design and are similar to those that would be included under Alternative A (refer to **Section 4.2.3** for further discussion). Thus, given the project design and mitigation, the impact to groundwater quality would be less than significant under Alternative C.

## **4.3.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE**

### **Surface Water**

#### ***Flooding***

As noted in **Section 3.3.2**, a majority of the Historic Rancheria site is located within the FEMA 100-year floodplain of the Cosumnes River. The finished floor of the proposed casino and hotel proposed under

Alternative D would be 18 inches above the base flood elevation line, consistent with the standards of the Sacramento County Department of Water Resources. Alternative D has been designed to ensure localized and downstream flooding would not occur as a result of the development of the casino. Specifically discussed in **Section 2.5.1**, Alternative D would include development of two large on-site flood offset basins, one north of the casino, designed to hold 115 af, and one west of the southern parking lot, designed to hold 24 af (**Appendix J**). These basins would offset the proposed development in the flood zone and ensure that Alternative D would not impede or redirect flood flows, alter floodplain elevations, or affect floodplain management, pursuant to EO 13690. No mitigation is warranted.

### ***Construction Impacts***

Construction activities proposed under Alternative D would include ground-disturbing activities such as clearing and grubbing, mass grading, and excavation, which could lead to erosion of topsoil on the Historic Rancheria site. Erosion from construction could increase sediment discharge to surface waters during storm events, thereby degrading downstream water quality. Discharges of sediments and pollutants to surface waters from construction activities proposed under Alternative D would be a potentially significant impact.

As discussed in **Section 2.5.2**, erosion control measures will be employed in compliance with the Phase I NPDES General Construction Permit for construction activities. A SWPPP will be developed prior to any ground disturbance at the Historic Rancheria site and will include BMPs to reduce potential surface water contamination during storm events. Implementation of mitigation measures presented in **Section 5.2** and the BMPs incorporated into the SWPPP would reduce or prevent adverse effects to the local and regional watershed from construction activities on the Historic Rancheria site. Therefore, Alternative D would not have significant construction-related impacts on water quality.

### ***Stormwater Runoff***

Implementation of Alternative D would alter the existing drainage pattern of the Historic Rancheria site and increase stormwater runoff as a result of increased on-site impervious surfaces. This increase in impervious surfaces could impact quantity and quality of stormwater runoff. Alternative D would convert approximately 41 acres of the agricultural land into a hotel and casino complex, surface roads, and parking areas, which would result in an increase in stormwater runoff over pre-development rates during 10- and 100-year storm events. Internal parking lots and other impervious surfaces would have a series of drain inlets and vegetated bioswales that would be connected to an internal storm drain conveyance system. Structural BMPs would control and reduce total suspended solids (TSS), oils and greases, nutrients, metals, and other potentially environmentally polluting minerals or materials from being released to downstream surfaces. Conveyance pipes would be sized to convey 100-year storm event flow. Runoff from buildings would be collected via roof leaders directly connected to storm drain conveyance pipes.

As described in **Section 2.5.2** and detailed in **Appendix J**, the internal stormwater piping system would discharge into two on-site stormwater detention basins. These detention basins are sized to offset the increase in runoff from development and would have metered outlets to control the rate of discharge.

The proposed southeastern detention basin would hold 6 af and would discharge to an existing drainage channel along the southern edge of the property. The combined stormwater/flood offset basin located to the north of the casino/hotel structure would hold approximately 115 af.

Outflow from the flood offset basin would be pumped either to the Cosumnes River (Option 1) or to the drainage channel along the Green Road (Option 2). A description of the hydrologic parameters of the two pumping options is discussed in **Appendix J**.

As discussed in **Section 2.5.2**, features have been incorporated into the project design to detain the increase in runoff on-site, maintaining the pre-development runoff rate, and all direct discharge to the Cosumnes River would be in compliance with the NPDES permit standards. Therefore, the project would not impair off-site surface waters and, with the inclusion of the protective measures in the project description as described above, Alternative D would not result in adverse effects associated with stormwater runoff.

## **Wastewater**

The projected average daily wastewater flow from Alternative D would be approximately 229,000 gpd with peak flow estimated at 305,000 gpd (**Appendix I**). As discussed in **Section 2.5.2**, wastewater treatment and disposal would be provided by the development of an on-site WWTP and a treated effluent discharge point to the Cosumnes River. To accommodate the projected peak flow from the casino development, the WWTP capacity would be 385,000 gpd. A recycled water tank with a capacity of approximately 220,000 gallons and a 200,000-gallon effluent disposal tank would additionally be developed to store treated wastewater prior to metered discharge to the Cosumnes River.

Operation of the outfall to the Cosumnes River could cause an incremental increase in the daily load of nutrients and other pollutants, further impairing water quality in the waterway. Increases in stream temperature could also result in negative impacts to fish and other freshwater aquatic life. The proposed on-site WWTP would treat the wastewater to very high standards as specified in an NPDES waste discharge permit from the USEPA. The USEPA regulates wastewater disposal on trust lands. The Tribe would comply with the conditions of the NPDES permit, leading to a less than significant impact to water quality from the discharge of tertiary treated wastewater. Nonetheless, mitigation measures have been included in **Section 5.3** that would reduce water quality impacts.

## Groundwater

### *Groundwater Supply*

The Historic Rancheria site is located far from any centralized water system and existing municipal water connections are unavailable. Therefore, potable water and irrigation demands would be met by the development of an on-site supply system consisting of new on-site groundwater wells and aboveground storage tank. The specifications of the proposed water supply system are included in **Section 2.5.2**. The estimated average daily water consumption (including landscaping and irrigation) for Alternative D would be approximately 362,000 gpd (**Appendix I**). Through the development of an on-site WWTP (as described in **Section 2.5.2**), recycled water would be used for indoor non-potable uses and for landscaping, reducing the peak day demand.

Approximately 720,000 gallons of fire protection storage would be needed to provide the minimum required fire flow for Alternative D. This demand may be met with either potable or recycled water; if recycled water is to be used, fire protection storage must be separate from potable water storage. See **Appendix I** for storage tank sizing.

Components of the on-site water supply system would include two on-site wells (one for continuous supply and one for redundancy in case of malfunction or maintenance of the primary well), a treatment plant, a 371,000-gallon water storage tank, and an internal distribution system. The approximate depth of the wells would be between 200 and 300 feet below the surface. The existing on-site wells, currently used for domestic and agricultural purposes, would be abandoned, used as monitoring wells, or kept in agricultural use. The Tribe would implement the on-site water system recommendations contained in the Water and Wastewater Feasibility Study (**Appendix I**), which are similar to those discussed under Alternative A. In addition, wellhead treatment would be installed for any water quality constituent that exceeds USEPA regulatory standards for drinking water.

The use of groundwater as the water supply source for Alternative D could significantly impact groundwater resources if use resulted in an overdraft of the Cosumnes Subbasin. While the net water use of Alternative D may cause negative impacts to wells and surface water ways in the vicinity of the Historic Rancheria Site, it is unlikely the additional groundwater use would create an overdraft effect, either localized or basin-wide, due to the relatively low water use rates. Based on the historical irrigation of the site, which did not cause reported overdraft effects, pumping for Alternative D is not expected to cause localized overdraft of the aquifer (**Appendix K**).

Groundwater use for Alternative D may lower the water table in the immediate area and affect a limited number of neighboring wells (**Appendix K**). Mitigation measures in **Section 5.3.2** would reduce these impacts to a less than significant level.

### ***Groundwater Recharge***

Although the development of Alternative D would introduce large areas of impermeable surfaces, the use of flood offset basins and stormwater detention ponds for storing stormwater and potential flood waters would allow collected stormwater to percolate into the groundwater table. Therefore, given the project design of Alternative D, the introduction of impermeable surfaces on the Historic Rancheria site would not have an adverse impact on groundwater recharge. No mitigation is needed.

### ***Groundwater Quality***

As with Alternatives A through C, the development of Alternative D would include the routine use of potentially hazardous construction materials that have the potential to percolate to shallow groundwater if accidental releases were to occur, which would constitute a potentially significant impact. The mitigation measures in **Section 5.2** and **Section 5.3.2** would prevent groundwater pollution during construction of Alternative D and reduce the potential impact from construction to a less than significant level.

As with Alternatives A through C, during project operation, runoff from Alternative D project facilities could flush contaminants that accumulate on pavement and other impervious surfaces into stormwater. Fertilizers used in landscaped areas could also enter stormwater if over-applied. The stormwater contained on-site may percolate into groundwater and could potentially transport contaminants with it. As noted in the Grading and Drainage Feasibility Study (**Appendix J**), several features to filter surface runoff have been incorporated into the project design and are similar to those described under Alternatives A through C (refer to **Section 4.3.1**). Thus, given the project design, the impact to groundwater quality from stormwater runoff would be minimal under Alternative D.

## **4.3.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

### **Surface Water**

#### ***Flooding***

As noted in **Section 3.3.2**, the majority of the Historic Rancheria site is within the 100-year floodplain of the Cosumnes River. As with Alternative D, Alternative E would be compliant with EO 13690 and would not impede or redirect flood flows, alter floodplain elevations, or affect floodplain management. The Grading and Drainage Feasibility Study (**Appendix J**) includes a design that would ensure localized and downstream flooding would not occur as a result of development of Alternative E. As discussed in **Section 2.6.1** and **Appendix J**, Alternative E would include the development of an on-site flood offset basin and stormwater detention basin sized appropriately to accommodate flood waters. Additionally, the finished floor of the proposed casino and associated structures would be 18 inches above the base flood elevation line, consistent with the standards of the Sacramento County Department of Water Resources. Given the project design of Alternative E, minimal impacts related to flooding would occur. No mitigation is needed.

### ***Construction Impacts***

Construction of Alternative E, located in the same development area on the Historic Rancheria site, would be similar to that of Alternative D and could result in sediment erosion, off-site movement of hazardous materials and pollutants, and impacts to surface water and groundwater quality.

As discussed in **Section 4.3.4** and **Appendix J**, erosion control measures will be employed in compliance with the Phase I NPDES General Construction Permit for construction activities during construction of the casino-resort project. A site-specific SWPPP will be developed prior to any ground disturbance at the Historic Rancheria site and will include BMPs to reduce potential surface water contamination during storm events. Implementation of mitigation measures presented in **Section 5.2** and the BMPs incorporated into the SWPPP would reduce or prevent adverse effects to the local and regional watershed from construction activities.

### ***Stormwater Runoff***

Potential impacts to surface water as a result of Alternative E would be similar to those of Alternative D. As with Alternative D, implementation of Alternative E would alter the existing drainage pattern of the site and increase stormwater runoff as a result of increased impervious surfaces. This increase in impervious surfaces could impact quantity and quality of stormwater runoff. Alternative E would convert approximately 38 acres of the agricultural parcels into a casino complex, surface roads, and parking areas, which would result in an increase in stormwater runoff over pre-development rates during 10- and 100-year storm events (**Appendix J**).

The Grading and Drainage Feasibility Study for Alternative E is similar as Alternative D (refer to **Section 4.3.4** and **Appendix J**), except the flood offset basin in Alternative E would be approximately 90 af, whereas the flood offset basin for Alternative D would be 115 af. Outflow from the flood offset basin would be pumped either into the Cosumnes River (Option 1) or to the drainage channel along the Green Road (Option 2) (**Appendix J**). As discussed in **Section 2.6**, drainage features have been incorporated into the project design to detain the increase in runoff on-site, maintaining the pre-development runoff rate. The project would not impair off-site surface waters and with the inclusion of the drainage features described in **Section 2.5.2** and **Appendix J**, Alternative E would not result in adverse effects associated with stormwater runoff.

### ***Wastewater***

As with Alternative D, wastewater generated by Alternative E would be treated and disposed of at an on-site WWTP, and treated effluent would be discharged to the Cosumnes River. As discussed in **Section 2.6.1** and **Appendix I**, the projected average daily wastewater flow for Alternative E would be approximately 151,000 gpd, with peak day flows estimated at 201,000 gpd. Similar to Alternative D, Alternative E includes a 250,000 gpd on-site WWTP, a 175,000-gallon recycled water storage tank, a

150,000-gallon effluent disposal tank, and discharge to the Cosumnes River pursuant to an NPDES discharge permit.

The Tribe would implement the recommendations for the WWTP described in the Water and Wastewater Feasibility Study (**Appendix I**), which are similar to those discussed under Alternative A Wastewater Option 1. Similar to Alternative D, treated wastewater would be discharged year-round from the WWTP to the Cosumnes River in compliance with the NPDES permit required by the USEPA.

## **Groundwater**

### ***Groundwater Supply***

As with Alternative D, water demands from Alternative E would be met by an on-site system consisting of a two new on-site groundwater well and storage tank. Details of the proposed water supply system are included in **Section 2.6.1** and **Appendix I**. The estimated average daily water consumption (including landscaping and irrigation) for Alternative E would be approximately 265,000 gpd (**Appendix I**).

Through the development of an on-site WWTP, recycled water would be used for indoor non-potable uses and for landscaping, reducing the peak day demand.

Approximately 720,000 gallons of fire protection storage is anticipated to provide the minimum required fire flow for Alternative E. This demand may be met with either potable or recycled water; if recycled water is to be used, fire protection storage must be separate from potable water storage. See **Appendix I** for storage tank sizing.

Similar to Alternative D, the components of the on-site water supply system proposed under Alternative E would include two on-site wells (one for continuous supply and one for redundancy in case of malfunction or maintenance of the primary well), a treatment plant, a 267,000-gallon water storage tank, and an internal distribution system.

The Tribe would implement the water system recommendations from the Water and Wastewater Feasibility Study (**Appendix I**), which are similar to those discussed under Alternative A. In addition, wellhead treatment would be installed to remove any water quality constituents that exceed USEPA or DHS regulatory standards for drinking water.

The use of groundwater as the water supply source for Alternative E could significantly impact groundwater resources if use resulted in an overdraft of the Cosumnes Subbasin. While the net water use of Alternative E could cause negative impacts to wells and surface waters in the vicinity of the site, it is unlikely the additional groundwater use would create an overdraft effect, either localized or basin wide, due to the relatively low water use rates. Based on the historical irrigation of the site, which did not cause reported overdraft effects, pumping for Alternative E is not expected to cause localized overdraft of the aquifer (**Appendix K**).

Groundwater use for Alternative E may lower the water table in the immediate area and affect a limited number of neighboring wells (**Appendix K**). Mitigation measures contained in **Section 5.3.2** would reduce these impacts to a less than significant level.

### ***Groundwater Recharge***

Although the development of Alternative E would introduce large areas of impermeable surfaces, the use of flood offset basins and stormwater detention ponds for storing stormwater and potential flood waters would allow collected stormwater to percolate into the groundwater table. Therefore, given the project design of Alternative E, the introduction of impermeable surfaces on the Historic Rancheria site would not have an adverse impact on groundwater recharge. No mitigation is needed.

### ***Groundwater Quality***

As with Alternative D, the development of Alternative E would include the routine use of potentially hazardous construction materials which have the potential to percolate to shallow groundwater if accidental releases were to occur and would constitute a potentially significant impact. The mitigation measures in **Section 5.2** and **Section 5.3.2** would prevent groundwater pollution during construction of Alternative E and reduce the potential impact from construction to a less than significant level.

During project operation, runoff from Alternative E project facilities could flush contaminants that accumulate on pavement and other impervious surfaces into stormwater. Fertilizers used in landscaped areas could also enter stormwater if over-applied. The stormwater contained on-site may percolate into the groundwater and could potentially transport contaminants with it. As noted in the Grading and Drainage Feasibility Study (**Appendix J**), several features to filter surface runoff have been incorporated into the project design and are similar to those described under Alternative D (refer to **Section 4.3.4**). Thus, given the project design, the impact to groundwater quality from stormwater runoff would be minimal under Alternative E.

## **4.3.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

### **Surface Water**

#### ***Flooding***

As discussed in **Section 3.3.3**, the Mall site is located outside the 100-year and 500-year floodplains. Therefore, Alternative F would not impede or redirect flood flows, alter floodplain elevations, or affect floodplain management. No significant impacts to floodplains would occur as a result of Alternative F.

#### ***Construction Impacts***

Similar to Alternatives A through E, construction activities under Alternative F would include ground-disturbing activities such as clearing and grubbing, mass grading, and excavation, which could lead to erosion of topsoil. Erosion from construction could increase sediment discharge to surface waters during

storm events thereby degrading downstream water quality. Discharges of sediments and pollutants, which include grease, oil, and fuel, to surface waters from construction activities and accidents are a potentially significant impact.

As discussed in **Section 2.7.2** and **Appendix J**, erosion control measures will be employed in compliance with the Phase I NPDES General Construction Permit for construction activities during construction. A SWPPP will be developed prior to any ground disturbance at the Mall site and will include BMPs to reduce potential surface water contamination during storm events. Implementation of measures presented in **Section 5.2** and the BMPs incorporated into the SWPPP would reduce or prevent adverse effects to the local and regional watershed from construction activities on the Mall site. Therefore, Alternative F would not have significant construction-related impacts on water quality.

### **Stormwater Runoff**

Implementation of Alternative F would alter the existing drainage pattern of the Mall site and increase stormwater runoff as a result of increased on-site impervious surfaces. Approximately 12 acres of impervious surface would be created on-site. However, due to the previous development, an off-site detention basin for Alternative F has previously been designed and built to accommodate runoff. Refer to **Appendix J** for further discussion. The paved parking lots are proposed to have a series of drainage inlets that are connected to a storm drain conveyance system, with conveyance pipes sized to convey the 100-year flow. The proposed on-site storm drain networks would be connected to the existing conveyance system. Runoff from the buildings would be collected via roof leaders directly connected to storm drain conveyance pipes.

The project design allows stormwater runoff to drain via gravity towards drainage swales and drain inlets that tie into the existing storm drain network. The storm drains would lead to an existing 48-inch diameter storm drain at the intersection of Bilby Road and Promenade Parkway, that is then routed to a 72-inch diameter storm drain that outfalls off-site. The existing storm drain network is routed to an existing off-site stormwater detention basin half a mile west of the site. A detailed description of stormwater systems previously installed or needing to be installed is provided in **Appendix J**.

If not treated properly prior to discharge, surface water runoff has the potential to significantly impact surface water quality. BMPs included in **Section 5.0** include various water quality features to improve stormwater quality, as described above, and would ensure protection of surface water quality. Accordingly, the implementation of Alternative F would not result in significant adverse effects to surface water quality.

### **Wastewater**

Wastewater generated by Alternative F could indirectly affect surface and groundwater quality. As noted in **Section 2.7.2** and **Appendix I**, Under Alternative F, the Tribe would enter into a service agreement

with the Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (SASD) to provide sewer service. Under the full build-out of Alternative F, the projected average daily wastewater flow would be 232,000 gpd, with a peak disposal flow of 309,000 gpd (**Appendix I**). The SRCSD WWTP is currently permitted to discharge 181 million gallons per day (MGD) of average dry weather flow (ADWF) and currently operates around 141 MGD for ADWF. The plant currently has an available capacity of about 40 MGD, which indicates there is enough available capacity to meet the demands of Alternative F (**Appendix I**).

Partially completed connections to SASD infrastructure are located on and in the immediate vicinity of the Mall site. The Mall site itself has several 8-inch diameter sewer lines, originally installed for the mall, that converge to a central 8-inch diameter line near Bilby Road and then connect to a 15-inch diameter trunk sewer main on Promenade Parkway. This 8-inch diameter connection would have to be upgraded to a 10 to 12-inch diameter sewer line to handle the projected flows from the casino. The size of the new sewer will depend on the slope of the line. The 15-inch diameter trunk sewer line on Promenade Parkway would likely have enough available capacity to handle the projected wastewater flows from the site. The completion of these connections to the existing wastewater conveyance system would occur under Alternative F and wastewater would be conveyed to the SRCSD WWTP where treatment would occur.

Treated effluent from the SRCSD WWTP would meet all current and future permit requirements and therefore would not adversely impact surface water or groundwater quality. The impacts to public utilities from the development of Alternative F are discussed in **Section 4.10**.

## **Groundwater**

### ***Groundwater Supply***

Development of Alternative F would not require the use of on-site groundwater supplies; therefore on-site groundwater extraction is not analyzed in this section. Water would be provided pursuant to a service agreement with the Sacramento County Water agency (SCWA). As discussed in **Section 3.3.3**, the SCWA's groundwater resources are expected to remain stable in drought years and to be resistant to the effects of climate change. Additionally, the Elk Grove Urban Water Management Plan (UWMP) based their assessment on projected buildout of the General Plan (EGWD, 2015). The Mall site was previously zoned commercial, and therefore development of the Proposed Project would not increase demand beyond what is presented in the UWMP, which assumes commercial use of the site. Refer to **Section 4.10** for an analysis of associated public services impacts.

### ***Groundwater Recharge***

Although the development of Alternative F would introduce areas of impermeable surfaces, the use of the existing stormwater detention ponds for storing stormwater runoff would allow collected stormwater to percolate into the groundwater table. Also, development of Alternative F would occur mostly on existing

impervious surfaces. Given the project design of Alternative F and the existing stormwater infrastructure, no adverse impacts related to groundwater recharge would occur. No mitigation is required.

### ***Groundwater Quality***

The development of Alternative F would include the routine use of potentially hazardous construction materials such as concrete washings, solvents, paint, oil, and grease, which may spill onto the ground and enter stormwater. These pollutants may percolate to shallow groundwater from construction activities and accidents have the potential to cause a potentially significant impact. The mitigation measures in **Section 5.2** and **Section 5.3.2** would prevent groundwater pollution during construction and reduce the potential impact from construction to a less than significant level.

During project operation, runoff from Alternative F facilities could flush trash, debris, oil, sediment, and grease that accumulate on pavement and other impervious surfaces into stormwater runoff. Fertilizers used in landscaped areas could also enter stormwater if over-applied. Although stormwater would be retained on-site and would not impact off-site surface water quality, the accumulated stormwater may percolate into the groundwater and could potentially transporting contaminants into with it. Several features to filter surface runoff have been incorporated into the project design (**Appendix J**). These features include the use of the existing stormwater detention basins to remove suspended solids, such as trash and sediment, and the use of vegetated swales to provide filtration by capturing sediment and pollutants within vegetation and the surface soil matrix. Thus, the impact to groundwater quality from stormwater runoff from Alternative F project facilities would be less than significant.

### **4.3.7 ALTERNATIVE G – NO ACTION**

Under the No Action alternative, no development would occur on the Twin Cities site and the Historic Wilton Rancheria site in the near-term. No change in land use would occur for these two sites, and these two sites would remain in their current state. None of the potentially adverse effects identified for Alternatives A through E would occur under Alternative G. No mitigation is required. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses, and comparable impacts to water resources would occur as with Alternative F as a result of the No Action alternative.

## 4.4 AIR QUALITY

This section identifies the direct effects to air quality that would result from the development of each alternative described in **Section 2.0**. Effects are measured against the environmental baseline presented in **Section 3.4**. Indirect and cumulative effects are identified in **Section 4.14** and **Section 4.15**, respectively. Measures to mitigate for adverse effects identified in this section are presented in **Section 5.4**.

### 4.4.1 METHODOLOGY

Development and operation of the project alternatives would emit criteria air pollutants (CAPs or criteria pollutants), hazardous air pollutants (HAPs), and greenhouse gases (GHGs). During construction, CAPs, HAP and GHG emissions from earth-moving activities, diesel-fueled trucks, and construction equipment would occur. During operation criteria pollutants, HAP, and GHG emissions from patron, worker, and delivery vehicles and onsite stationary sources (i.e. boilers and stoves) would occur. This section presents the methodology used to assess the affected environment and to evaluate the potential air quality effects of the project alternatives.

### Construction Analysis

Construction would entail mass earthwork, fine grading, and building, road, and parking lot construction. A variety of heavy equipment, including trucks, scrapers, excavators, and graders, would be used to complete each phase. Effects on air quality during construction were evaluated by estimating the amount of criteria pollutants that would be emitted over the duration of the construction period (for each phase of construction where applicable). Particulate matter 10 and 2.5 microns in size (PM<sub>10</sub> and PM<sub>2.5</sub>, respectively), ozone precursors, and carbon monoxide (CO) are the primary pollutants of concern resulting from operation of construction equipment and earth-moving activities. For Alternatives A, B, C, D, and E fill would be sourced at the project site. Alternative F requires the importation 7,000 cubic yard (yd<sup>3</sup>) of engineered fill.

Reactive organic gases (ROG), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), and diesel particulate matter (DPM) emissions from the construction of Alternatives A, B, C, D, E, and F would primarily be produced by diesel-fueled equipment use. The majority of these emissions would be from on- and off-road construction equipment and truck use at the project site. Emissions from diesel-fueled trucks and construction equipment were calculated using the U.S. Environmental Protection Agency (USEPA) approved California Emissions Estimator Model (CalEEMod), Version 2013.2.2 (CalEEMod, 2013). The vehicle trips required to import the engineered fill for Alternative F were factored into the emissions modeling conducted for the alternative. A detailed list of the proposed equipment and emissions resulting from the equipment is located in **Appendix S**.

The majority of the PM<sub>10</sub> and PM<sub>2.5</sub> emissions would result from the fugitive dust generated during earth-moving activities, such as site grading. In addition, fugitive dust may be generated during the import of

fill under Alternative F. CalEEMod was used to estimate PM<sub>10</sub> and PM<sub>2.5</sub> project related emissions from equipment exhaust and fugitive dust. Emissions were estimated assuming that construction would begin in January 2018 and continue at an average rate of 22 days per month for all project alternatives. The construction duration for all project alternatives is estimated to be 18 months. Emissions results are summarized below and included in **Appendix S**.

### **Operational Analysis**

CalEEMod was also used to estimate emissions associated with long-term operation of the project alternatives; however, stationary source emissions (e.g., boilers and emergency generators) were estimated using manufacturer emission specifications and USEPA AP-42 emission factors. Input values for the CalEEMod included data from the traffic study of the project alternatives. Trip generation estimates from the traffic study were used in the CalEEMod. Trip length values, specific to each of the project alternatives provided in the traffic study were used in CalEEMod.

Trip generation rates for the CalEEMod runs have been adjusted to reflect primary trips estimated to be generated by the project alternatives. This was done so that diverted trips and pass-by trips are not included in the CalEEMod analysis. Pass-by-trips are vehicles that are already on the road and decide to make a stop along the way to their original destination. Diverted trips are trips similar to pass-by trips; however, diverted trips need not have an alternative destination directly adjacent to the trip corridor. Diverted trips were excluded from the analysis to focus the analysis on the net effects of the project alternatives.

The average length of vehicle trips associated with the casino alternatives is expected to be longer than the default trip length values included in CalEEMod. Therefore, project-specific trip length values were developed and are shown in the Traffic Impact Study (provided as **Appendix O**); these values are used in the following air quality analysis.

The CalEEMod incorporated the following assumptions:

- Trip generation rates were derived from the Traffic Impact Analysis provided as **Appendix O**;
- Vehicle type distribution default values were used in CalEEMod;
- Full build out of the project is assumed to be June 1, 2019;
- The convention center, land use in Alternatives A, D, and F are defined in the CalEEMod air model as Movie Theater (no matinee). The Movie Theater (no matinee) land use in the CalEEMod allows the emissions to be based on the number of seats available. The designation of Movie Theater (no matinee) does not alter the total emission estimated for the convention center land use in Alternatives A, D, and F.
- Water/wastewater and solid waste generation model inputs are from **Sections 4.3 and 4.10**, respectively.

Output files from the CalEEMod are presented in **Appendix S**.

### Tribal New Source Review

A Tribal minor new source review (NSR) permit is required prior to construction if the projected aggregate operational emissions from stationary sources at the facility exceed the minor NSR thresholds listed in **Table 4.4-1**. If applicable, the Tribe would apply for and obtain a site specific or, if promulgated prior to the start of construction, a general minor NSR permit in accordance with the USEPA guidelines and Tribal NSR regulations. USEPA would review the emission sources at the selected alternative and determine if additional emission controls are required.

**TABLE 4.4-1**  
TRIBAL MINOR NEW SOURCE REVIEW THRESHOLDS

Pollutant	Emissions Threshold (tpy)
NO <sub>x</sub>	5
VOCs	2
PM	10
PM <sub>10</sub>	5
PM <sub>2.5</sub>	0.6
CO	10
SO <sub>2</sub>	10
Pb	0.1
Source: 40 CFR 49.153.	

### Federal General Conformity

Pursuant to the Clean Air Act, the USEPA's conformity regulations apply to Federal actions that would cause emissions of CAPs to occur in locations designated as nonattainment or maintenance areas for the emitted pollutants. As discussed in **Section 3.4** the project sites are located in an area that is classified as nonattainment for ozone (NO<sub>x</sub> and ROG, ozone precursors) and PM<sub>2.5</sub> and maintenance for PM<sub>10</sub> under the National Ambient Air Quality Standards (NAAQS); therefore, if project emissions are equal to or exceed General Conformity *de minimis* thresholds for these CAP provided in 40 CFR 93.153 (b)(1) and (2), then a federal general conformity determination analysis would be required.

The northwestern portion of the SVAB is designated as maintenance for CO under the NAAQS. The project sites are not located within this designated area; however, a portion of the trips generated by the development alternatives (Alternatives A through F) would pass through this maintenance area (see Draft EIS **Appendix O**, Figures 14, 34, 42, and 61). Therefore, relying on the trip distribution for the project sites it was assumed that all trips travelling to/from the northwest of the project sites via Highway 99 would emit CAPs within the maintenance area for CO. This percentage of trip distribution was utilized to estimate the project-related CO emissions that would be emitted within the SVAB CO maintenance area. The Final EIS accounts for this percentage of trip distribution in its "Unmitigated operation emissions –

*De Minimis* Thresholds” tables (**Tables 4.4-2** through **4.4-25**), presented as a “percent mobile reduction for CO” of the mobile CO emissions presented in the Draft EIS.

The area and stationary source emissions of Alternatives A through F would be covered under a Tribal minor NSR permit and therefore are exempt emissions under the General Conformity provisions of CAA 40 CFR 93.153(d)(1). While these emission are presented in the **Tables 4.4-2** through **4.4-25** below, the emissions are not included in the total annual emissions to determine conformity. The energy use and mobile emissions from Alternatives A through F are not exempt from a conformity determination under 40 CFR 93.153 and are thereby considered the total annual emissions that must be compared to the *de minimis* thresholds. Whether a conformity determination will be required for each project alternative is discussed below in this **Section 4.4**.

### **Sacramento Metropolitan Air Quality Management District Thresholds**

While the project sites are located within the SVAB and SMAQMD’s jurisdictional boundaries, SMAQMD thresholds do not apply to a federal action and therefore the SMAQMD thresholds are provided for informational and comparative purposes only under the analysis for each alternative. As discussed above, the effects of a federal action on SMAQMD air quality management is assessed under General Conformity as required under the CAA.

### **Carbon Monoxide Hot Spot Analysis**

Implementation of the project alternatives would result in emissions of CO. Because CO disperses rapidly with increased distance from the source, emissions of CO are considered localized pollutants of concern rather than regional pollutants, and can be evaluated by Hot Spot Analysis. In accordance with 40 Code of Federal Regulation (CFR) 93.123, quantitative analysis is required if the following criteria are met:

- For projects in or affecting locations, areas, or categories of sites which are identified in the applicable implementation plan as sites of violation or possible violation;
- For projects affecting intersections that are at Level of Service (LOS) D, E, or F, or those that will change to LOS D, E, or F because of increased traffic volumes related to the project;
- For any project affecting one or more of the top three intersections in the CO nonattainment or maintenance area with highest traffic volumes, as identified in the applicable implementation plan; and
- For any project affecting one or more of the top three intersections in the CO nonattainment or maintenance area with the worst LOS, as identified in the applicable implementation plan.

The project alternatives are not in an area or category of site that has been identified in a plan. As shown in the Traffic Impact Analysis (TIA), provided as **Appendix O**, no intersection currently operating at LOS D, E, or F would be affected by project-related traffic and after mitigation no intersection in the

study area would operate at LOS D, E, or F. The project alternatives are not located in a CO nonattainment or maintenance area. Therefore, no quantitative analysis is required.

## **Climate Change**

The CEQ provides guidance on integrating analysis of GHGs in NEPA documents (see **Section 3.4**). As directed by the CEQ Guidance, this EIS considers whether project emissions have individual or cumulative effects on climate change. Given the global nature of climate change impacts, individual project impacts are most appropriately addressed in terms of the incremental contribution to a global cumulative impact (provided in **Section 4.15**). This approach is consistent with the view articulated by the *Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report* (IPCC, 2014). Therefore, refer to **Section 4.15** for a discussion and analysis of cumulative impacts related to climate change.

## **Federal Class I Areas**

If any alternative emits greater than the Prevention of Significant Deterioration (PSD) threshold of 250 tons per year (tpy) of any one criteria pollutant from stationary sources during construction or operation then a best available control technology (BACT) analysis will be conducted. As stated in **Section 3.4**, there are no Federal Class I Areas with 100 kilometers of the project site; therefore, no further analysis is warranted.

### **4.4.2 ALTERNATIVE A – TWIN CITIES CASINO RESORT**

#### **Construction Emissions**

Construction of Alternative A would emit PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, CO, ROG, GHGs, and HAPs (primarily in the form of DPM) from the operation of construction equipment and grading activities. Emissions from construction equipment have the potential to increase the concentration of DPM in the close vicinity (within approximately 500 feet) of the construction site, if control measures are not implemented.

Construction is anticipated to begin in 2018 and last approximately 18 months. Construction is assumed to occur 8-hours a day, 5 days a week. Unmitigated construction emission totals for Alternative A are shown in **Table 4.4-2** and mitigated emissions are provided in **Table 5-1**.

A State is not required to evaluate sources of ammonia (NH<sub>3</sub>) emissions for reduction measures unless the State or USEPA makes a technical demonstration that emissions of ammonia from sources in the State significantly contribute to PM<sub>2.5</sub> concentrations in a given nonattainment area (USEPA, 2007).

NH<sub>3</sub> when reacted with NO<sub>x</sub> to produce ammonia nitrate is a large fraction of PM<sub>2.5</sub> in the SVAB. If NO<sub>x</sub> in the region increases, then a 1:1 ratio increase of PM<sub>2.5</sub> occurs due to the presence of NH<sub>3</sub> in the region (SMAQMD, 2013). Since construction emissions of NO<sub>x</sub> are significantly below the applicable levels, no

significant increase in NO<sub>x</sub> emissions from the project would occur; therefore, the project would not indirectly increase the level of ammonia nitrate or PM<sub>2.5</sub> in the SVAB.

**TABLE 4.4-2**  
ALTERNATIVE A UNMITIGATED CONSTRUCTION EMISSIONS – DE MINIMIS THRESHOLDS

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
2018	4.40	19.21	18.01	0.04	2.99	1.67
2019	2.10	2.80	3.03	0.01	0.33	0.20
Maximum Year Emissions	4.40	19.21	18.01	0.04	2.99	1.67
<i>De Minimis</i> threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	No	No	N/A	No	No
Notes: N/A = Not Applicable; General Conformity <i>de minimis</i> thresholds are not applicable due to attainment status (Refer to <b>Section 3.4</b> ). Source: CalEEMod, 2013						

**General Conformity Determination**

As shown in **Table 4.4-2** emissions of individual criteria pollutants from construction of Alternative A would not exceed the applicable General Conformity *de minimis threshold*; therefore, no conformity determination is required. However, to further reduce project-related construction criteria pollutants and DPM emissions mitigation measures are provided in **Section 5.4.1**.

**SMAQMD Thresholds Compliance**

As shown in **Table 4.4-3**, emissions of ozone precursor NO<sub>x</sub> from construction of Alternative A would exceed the SMAQMD threshold of 85 pounds per day. Mitigation provided in **Section 5.4.1** would minimize ozone precursor emissions from construction of Alternative A and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-3**  
ALTERNATIVE A UNMITIGATED CONSTRUCTION EMISSIONS – SMAQMD THRESHOLD

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
2018	60.46	281.60	257.19	0.53	45.78	25.23
2019	39.57	59.65	66.82	0.13	6.98	4.14
Maximum Day Emissions	60.46	281.60	257.19	0.53	45.78	25.23
SMAQMD Threshold	N/A	85	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	N/A	Yes	N/A	N/A	N/A	N/A
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants Source: CalEEMod, 2013.						

### Operational Vehicle and Area Emissions

Buildout of Alternative A would result in the generation of mobile emissions from patron, employee, and delivery vehicles, as well as area and energy criteria pollutant emissions. Also, stationary source emissions from combustion of natural gas in boilers, stoves, heating units, and other equipment on the project site would result from buildout of Alternative A. Unmitigated operation emission totals for the Alternative A are shown in **Table 4.4-4** and mitigated emissions are provided in **Table 5-2**. Detailed calculations of vehicle and area emissions are included as **Appendix S**.

**TABLE 4.4-4**  
ALTERNATIVE A UNMITIGATED OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.29	1.3	4.18	0.19	0.36	0.36
Area	2.74	0.0004	0.05	0.00	0.00	0.00
Energy	0.16	1.46	.23	0.01	0.11	0.11
Mobile	12.51	52.49	217.02	0.69	50.18	13.97
59 Percent Mobile Reduction for CO*			-128.04			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>15.70</b>	<b>55.25</b>	<b>94.44</b>	<b>0.89</b>	<b>50.65</b>	<b>14.44</b>
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	Yes	No	N/A	No	No

Notes: N/A = Not Applicable; Stationary sources include boilers and emergency generator use; \*Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Emissions from waste and water are negligible and round to zero.  
Source: CalEEMod, 2013, USEPA 1995

Since operational emissions of NO<sub>x</sub> exceed the applicable General Conformity *de minimis* threshold, the project is required to fully offset NO<sub>x</sub> emissions resulting in no net increase in NO<sub>x</sub> emissions from the project; therefore, the project would not indirectly increase the level of ammonia nitrate or PM<sub>2.5</sub> in the SVAB.

As shown in **Table 4.4-4**, emissions of the ozone precursor NO<sub>x</sub> from operation of Alternative A would exceed the applicable General Conformity *de minimis* threshold. Mitigation provided in **Section 5.4.2** would minimize criteria air pollutant emissions from operation of Alternative A and result in a less than significant adverse effect associated with the regional air quality environment.

As shown in **Table 4.4-4**, emissions of individual criteria pollutants from the operation of Alternative A from stationary sources, area, and energy sources would exceed the Tribal NSR threshold of 2 tpy for ROG; therefore, an associated minor new source permit would be required. As discussed in **Section 4.4.1**, if Alternative A were selected, the Tribe would apply for and obtain a site-specific permit or, if

promulgated prior to the start of construction, the Tribe may request coverage under a class-specific general permit or permit by rule for casinos, boilers, and/or stationary compression ignition engines. The USEPA would review the emissions sources at Alternative A and determine if additional controls are required.

**General Conformity Determination**

The Twin Cities site is in a region of nonattainment for ozone (NO<sub>x</sub> and ROG precursors) and PM<sub>2.5</sub>. In accordance with the federal CAA 40 CFR Part 93, if a region is in nonattainment for any criteria pollutant and project-related emissions exceed General Conformity *de minimis* thresholds, then a conformity determination is required. The Twin Cities site is located within the SVAB, which as stated in **Section 3.4** is designated severe-15 for ozone; therefore, in accordance with 40 CFR Part 153 (b)(1), the General Conformity *de minimis* threshold for ozone precursors is 25 tpy. In accordance with 40 CFR Part 153 (b)(1) and (2) the applicable General Conformity *de minimis* thresholds for SO<sub>2</sub> and PM<sub>2.5</sub> is 100 tpy.

Because project-related direct and indirect emissions from Alternative A occur in a nonattainment area and project-related operational emissions (refer to **Table 4.4-4**) would exceed the General Conformity *de minimis* threshold for the ozone precursor NO<sub>x</sub>, a general conformity determination for NO<sub>x</sub> will be required if Alternative A is selected. A draft general conformity determination for Alternative A was provided in **Appendix T** of the Draft EIS because Alternative A was the Tribe’s Proposed Action when the Draft EIS was published in December 2015.

**SMAQMD Thresholds Compliance**

As shown in **Table 4.4-5**, emissions of ozone precursors NO<sub>x</sub> and ROG from operation of Alternative A would exceed the SMAQMD thresholds of 65 pounds per day. Mitigation provided in **Section 5.4.2** would minimize ozone precursor emissions from operation of Alternative A and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-5**  
ALTERNATIVE A UNMITIGATED OPERATIONAL EMISSIONS – SMAQMD THRESHOLD

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
Stationary Sources	2.97	53.92	33.13	11.01	1.97	1.97
Area	15.01	0.0034	0.3652	0.00003	0.0013	0.0013
Energy	0.88	7.99	6.72	0.05	0.61	0.61
Mobile	103.34	415.42	1884.87	5.57	387.94	107.60
<b>Total Emissions</b>	<b>122.20</b>	<b>477.33</b>	<b>1,925.08</b>	<b>16.63</b>	<b>390.53</b>	<b>110.18</b>
SMAQMD Threshold	65	65	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	Yes	Yes	N/A	N/A	N/A	N/A
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants. Stationary sources include boilers and emergency generator use. Source: CalEEMod, 2013, USEPA 1995						

### 4.4.3 ALTERNATIVE B – REDUCED INTENSITY TWINS CITIES CASINO

#### Construction Emissions

Construction of Alternative B would be similar to Alternative A on a smaller scale. Construction is anticipated to begin in 2018 and last approximately 18 months. Construction is assumed to occur 8-hours a day, 5 days a week. Unmitigated construction emission totals for the Alternative B are shown in **Table 4.4-6** and mitigated emissions are provided in **Table 5-1**.

The PM<sub>2.5</sub> analysis under Alternative A is applicable for Alternative B.

**TABLE 4.4-6**  
ALTERNATIVE B UNMITIGATED CONSTRUCTION EMISSIONS – DE MINIMIS THRESHOLDS

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
2018	2.17	9.82	10.83	0.02	1.32	0.70
2019	1.11	1.95	2.00	0.004	0.19	0.13
Maximum Year Emissions	2.17	9.82	10.83	0.02	1.32	0.70
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	No	No	N/A	No	No
Notes: N/A = Not Applicable; General Conformity <i>de minimis</i> thresholds are not applicable due to attainment status (Refer to <b>Section 3.4</b> ).						
Source: CalEEMod, 2013.						

#### General Conformity Determination

As shown in **Table 4.4-6**, emissions of individual criteria pollutants from construction of Alternative B would not exceed General Conformity *de minimis* thresholds; therefore, no conformity determination is required. However, to further reduce project-related construction criteria pollutant and DPM emissions mitigation measures are provided in **Section 5.4.1**.

#### SMAQMD Thresholds Compliance

As shown in **Table 4.4-7**, emissions of ozone precursor NO<sub>x</sub> from construction of Alternative B would exceed the SMAQMD threshold of 85 pounds per day. Mitigation provided in **Section 5.4.1** would minimize ozone precursor emissions from construction of Alternative B and result in a less than significant adverse effect associated with the regional air quality environment.

#### Operational Vehicle and Area Emissions

Buildout of Alternative B would result in the generation of mobile emissions from patron, employee, and delivery vehicles, as well as area criteria pollutant emissions on the project site. Unmitigated operation

emission totals for the Alternative B are shown in **Table 4.4-8** and mitigated emissions are provided in **Table 5-2**. Detailed calculations of vehicle and area emissions are included as **Appendix S**.

**TABLE 4.4-7**  
ALTERNATIVE B UNMITIGATED CONSTRUCTION EMISSIONS – SMAQMD THRESHOLD

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
2018	22.51	195.85	272.38	0.52	31.51	14.47
2019	20.99	39.99	41.24	0.08	4.02	2.60
Maximum Day Emissions	22.51	195.85	272.38	0.52	31.51	14.47
SMAQMD Threshold	N/A	85	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	<i>N/A</i>	<i>Yes</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants Source: CalEEMod, 2013.						

**TABLE 4.4-8**  
ALTERNATIVE B UNMITIGATED OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.16	0.69	2.4	0.1	0.21	0.21
Area	1.35	0.00	0.0014	0.00	0.00	0.00
Energy	0.09	0.83	0.69	0.005	0.06	0.06
Mobile	9.51	39.63	164.04	0.52	37.85	10.54
59 Percent Mobile Reduction for CO*			-96.78			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>11.11</b>	<b>41.15</b>	<b>70.35</b>	<b>0.63</b>	<b>38.12</b>	<b>10.81</b>
<i>De Minimis threshold</i>	25	25	100	N/A	100	100
<i>Exceed CEQ threshold</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>N/A</i>	<i>No</i>	<i>No</i>
Notes: N/A = Not Applicable; Stationary sources include boilers and emergency generator use; *Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Emissions from waste and water are negligible and round to zero. Source: CalEEMod, 2013, USEPA 1995						

As shown in **Table 4.4-8**, emissions of ozone precursors from the operation of Alternative B would exceed the General Conformity *de minimis* threshold only for NO<sub>x</sub>. Mitigation provided in **Section 5.4.2** would further reduce criteria air pollutant emissions from operation of Alternative B and result in a less than significant adverse effect associated with the regional air quality environment.

The PM<sub>2.5</sub> analysis under Alternative A is applicable for Alternative B.

As shown in **Table 4.4-8**, emissions of individual criteria pollutants from stationary sources, area, and energy sources would not exceed the Tribal NSR thresholds; therefore, an associated minor new source permit would not be required.

**General Conformity Determination**

Since Alternative B’s project-related direct and indirect emissions occur in a nonattainment area and project-related operational emissions (refer to **Table 4.4-8**) exceed General Conformity *de minimis* thresholds for the ozone precursor NO<sub>x</sub>, a general conformity determination is required prior to the federal action.

**SMAQMD Thresholds Compliance**

As shown in **Table 4.4-9**, emissions of ozone precursors NO<sub>x</sub> and ROG from operation of Alternative B would exceed the SMAQMD thresholds of 65 pounds per day. Mitigation provided in **Section 5.4.2** would minimize ozone precursor emissions from operation of Alternative B and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-9**  
ALTERNATIVE B UNMITIGATED OPERATIONAL EMISSIONS – SMAQMD THRESHOLD

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
Stationary Sources	2.97	53.92	33.13	11.01	1.97	1.97
Area	7.38	0.00011	0.011	0.00	0.00004	0.00004
Energy	0.50	4.53	3.80	0.03	0.34	0.34
Mobile	84.94	339.64	1,541.40	4.55	316.94	87.91
<b>Total Emissions</b>	<b>95.79</b>	<b>398.09</b>	<b>1,578.35</b>	<b>15.59</b>	<b>319.25</b>	<b>90.22</b>
SMAQMD Threshold	65	65	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	Yes	Yes	N/A	N/A	N/A	N/A

Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants. Stationary sources include boilers and emergency generator use.  
Source: CalEEMod, 2013, USEPA 1995

**4.4.4 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

**Construction Emissions**

Construction of Alternative C would be similar in scope to Alternative A. Construction is anticipated to begin in 2018 and last approximately 18 months. Construction is assumed to occur 8-hours a day, 5 days a week. Unmitigated construction emission totals for Alternative C are shown in **Table 4.4-10** and mitigated emissions are provided in **Table 5-1**.

**TABLE 4.4-10**  
ALTERNATIVE C UNMITIGATED CONSTRUCTION EMISSIONS – DE MINIMIS THRESHOLDS

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
2018	3.33	7.39	7.78	0.01	1.50	0.80
2019	2.42	1.20	1.55	0.003	0.22	0.11
Maximum Year Emissions	3.33	7.39	7.78	0.01	1.50	0.80
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	No	No	N/A	No	No
Notes: N/A = Not Applicable; General Conformity <i>de minimis</i> thresholds are not applicable due to attainment status. (Refer to <b>Section 3.4</b> ). Source: CalEEMod, 2013.						

**General Conformity Determination**

As shown in **Table 4.4-10**, emissions of individual criteria pollutants from construction of Alternative C would not exceed the General Conformity *de minimis* thresholds; therefore, no conformity determination is required. However, to further reduce project-related construction criteria pollutants and DPM emissions mitigation measures are provided in **Section 5.4.1**.

**SMAQMD Thresholds Compliance**

As shown in **Table 4.4-11**, emissions of ozone precursor NO<sub>x</sub> from construction of Alternative C would exceed the SMAQMD threshold of 85 pounds per day. Mitigation provided in **Section 5.4.1** would minimize ozone precursor emissions from construction of Alternative C and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-11**  
ALTERNATIVE C UNMITIGATED CONSTRUCTION EMISSIONS – SMAQMD THRESHOLD

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
2018	47.30	158.90	171.01	0.29	38.31	20.44
2019	45.20	24.66	31.88	0.07	4.52	2.18
Maximum Day Emissions	47.30	158.90	171.01	0.29	38.31	20.44
SMAQMD Threshold	N/A	85	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	N/A	Yes	N/A	N/A	N/A	N/A
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants Source: CalEEMod, 2013.						

## Operational Vehicle and Area Emissions

Buildout of Alternative C would result in the generation of mobile emissions from patron, employee, and delivery vehicles, as well as area and energy criteria pollutant emissions from combustion of natural gas in boilers, stoves, heating units, and other equipment on the project site. Unmitigated operation emission totals for Alternative C are shown in **Table 4.4-12** and mitigated emissions are provided in **Table 5-2**. Detailed calculations of vehicle and area emissions are included as **Appendix S**.

**TABLE 4.4-12**  
ALTERNATIVE C UNMITIGATED OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.24	0.49	3.72	0.03	0.34	0.34
Area	3.16	0.00	0.01	0.00	0.00	0.00
Energy	0.02	0.19	0.16	0.001	0.01	0.01
Mobile	15.27	52.02	222.82	0.66	47.90	13.35
78 Percent Mobile Reduction for CO*			-173.80			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>18.69</b>	<b>52.70</b>	<b>52.91</b>	<b>0.69</b>	<b>48.26</b>	<b>13.71</b>
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	Yes	No	N/A	No	No

Notes: N/A = Not Applicable; Stationary sources include boilers and emergency generator use; \*Based on trip distribution through SVAB areas designated as maintenance for CO under NAAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Emissions from waste and water are negligible and round to zero.  
Source: CalEEMod, 2013, USEPA 1995.

As shown in **Table 4.4-12**, emissions of individual criteria pollutants from operation of Alternative C would exceed the General Conformity *de minimis* threshold only for NO<sub>x</sub>. Mitigation provided in **Section 5.4.2** would minimize criteria air pollutant emissions from operation of Alternative C and result in a less than significant adverse effect associated with the regional air quality environment.

The PM<sub>2.5</sub> analysis under Alternative A is applicable for Alternative C.

As shown in **Table 4.4-12**, emissions of individual criteria pollutants from stationary sources (area and energy in the above table) would exceed the Tribal NSR threshold of 2 tpy for ROG; therefore, an associated minor NSR permit may be required. As discussed in **Section 4.4.1**, the Tribe would apply for and obtain a minor NSR permit in accordance with the USEPA guidelines and NSR regulations. Because the emission sources are from boilers and emergency generators, it is anticipated that no additional emissions controls will be required by the USEPA to implement the selected alternative.

### General Conformity Determination

Since project-related direct and indirect emissions occur in a nonattainment area and project-related operational emissions (refer to **Table 4.4-12**) would exceed General Conformity *de minimis* thresholds for the ozone precursor NO<sub>x</sub>, a general conformity determination will be conducted prior to federal action.

### SMAQMD Thresholds Compliance

As shown in **Table 4.4-13**, emissions of ozone precursors NO<sub>x</sub> and ROG from operation of Alternative C would exceed the SMAQMD thresholds of 65 pounds per day. Mitigation provided in **Section 5.4.2** would minimize ozone precursor emissions from operation of Alternative C and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-13**  
ALTERNATIVE C UNMITIGATED OPERATIONAL EMISSIONS – SMAQMD THRESHOLD

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
Area	17.30	0.001	0.07	0.00	0.0003	0.0003
Energy	0.11	1.04	0.87	0.01	0.08	0.08
Mobile	117.43	379.26	1,737.61	4.93	341.41	94.76
<b>Total Emissions</b>	<b>134.84</b>	<b>380.30</b>	<b>1,738.55</b>	<b>4.94</b>	<b>341.49</b>	<b>94.84</b>
SMAQMD Threshold	65	65	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	Yes	Yes	N/A	N/A	N/A	N/A
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants Source: CalEEMod, 2013.						

## 4.4.5 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE

### Construction Emissions

Construction of Alternative D would be similar to Alternative A; however, the Historic Rancheria site is located in the community of Wilton and has a slightly different footprint. Unmitigated construction emission totals for Alternative D are shown in **Table 4.4-14** and mitigated emissions are provided in **Table 5-1**.

### General Conformity Determination

As shown in **Table 4.4-14**, emissions of individual criteria pollutants from construction of Alternative D would not exceed General Conformity *de minimis* thresholds; therefore, no general conformity determination is required. However, to further reduce project-related construction criteria pollutant emissions mitigation measures are provided in **Section 5.4.1**.

**TABLE 4.4-14**  
ALTERNATIVE D UNMITIGATED CONSTRUCTION EMISSIONS – DE MINIMIS THRESHOLDS

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
2018	4.40	19.21	18.01	0.04	2.99	1.67
2019	2.10	2.80	3.03	0.01	0.33	0.20
Maximum Year Emissions	4.40	19.21	18.01	0.04	2.99	1.67
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	No	No	N/A	No	No

Source: CalEEMod, 2013.

### SMAQMD Thresholds Compliance

As shown in **Table 4.4-15**, emissions of ozone precursor NO<sub>x</sub> from construction of Alternative D would exceed the SMAQMD threshold of 85 pounds per day. Mitigation provided in **Section 5.4.1** would minimize ozone precursor emissions from construction of Alternative D and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-15**  
ALTERNATIVE D UNMITIGATED CONSTRUCTION EMISSIONS – SMAQMD THRESHOLD

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
2018	61.41	287.58	286.05	0.53	45.78	25.24
2019	39.43	59.97	64.81	0.13	6.98	4.14
Maximum Day Emissions	61.41	287.58	286.05	0.53	45.78	25.24
SMAQMD Threshold	N/A	85	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	N/A	Yes	N/A	N/A	N/A	N/A

Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants  
Source: CalEEMod, 2013.

### Operational Vehicle and Area Emissions

Development of Alternative D would be similar to Alternative A; however, the Historic Rancheria site is located in the community of Wilton and has a slightly different footprint. Unmitigated operation emission totals for Alternative D are shown in **Table 4.4-16** and mitigated emissions are provided in **Table 5-2**. Detailed calculations of vehicle and area emissions are included as **Appendix S**.

As shown in **Table 4.4-16**, emissions of ozone precursors from operation of Alternative D would exceed the General Conformity *de minimis* threshold only for NO<sub>x</sub>. Mitigation provided in **Section 5.4.2** would

minimize criteria air pollutant emissions from operation of Alternative D and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-16**  
ALTERNATIVE D UNMITIGATED OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.29	1.3	4.18	0.19	0.36	0.36
Area	2.74	0.0004	0.05	0.00	0.00	0.00
Energy	0.16	1.46	1.23	0.01	0.11	0.11
Mobile	12.51	52.49	217.02	0.69	50.18	13.97
60 Percent Mobile Reduction for CO*			-130.21			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>15.70</b>	<b>55.25</b>	<b>92.27</b>	<b>0.89</b>	<b>50.65</b>	<b>14.44</b>
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	Yes	No	N/A	No	No
Notes: N/A = Not Applicable; Stationary sources include boilers and emergency generator use; *Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Emissions from waste and water are negligible and round to zero. Source: CalEEMod, 2013, USEPA 1995						

The PM<sub>2.5</sub> analysis under Alternative A is applicable for Alternative D.

As shown in **Table 4.4-16**, emissions of individual criteria pollutants from stationary sources, area, and energy sources would exceed the Tribal NSR threshold of 2 tpy for ROG; therefore, an associated minor new source permit may be required. As discussed in **Section 4.4.1**, the Tribe would apply for and obtain a minor NSR permit in accordance with the USEPA guidelines and Tribal NSR regulations. Because the emission sources are from boilers and emergency generators, it is anticipated that no additional emissions controls will be required by the USEPA to implement the selected alternative.

### **General Conformity Determination**

Since project-related direct and indirect emissions occur in a nonattainment area and project-related operational emissions (refer to **Table 4.4-16**) would exceed General Conformity *de minimis* thresholds for the ozone precursor NO<sub>x</sub>, a general conformity determination analysis will be conducted prior to federal action.

### **SMAQMD Thresholds Compliance**

As shown in **Table 4.4-17**, emissions of ozone precursors NO<sub>x</sub> and ROG from operation of Alternative D would exceed the SMAQMD thresholds of 65 pounds per day. Mitigation provided in **Section 5.4.2**

would minimize ozone precursor emissions from operation of Alternative D and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-17**  
ALTERNATIVE D UNMITIGATED OPERATIONAL EMISSIONS – SMAQMD THRESHOLD

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
Stationary Sources	2.97	53.92	33.13	11.01	1.97	1.97
Area	15.01	0.003	0.37	0.00003	0.001	0.001
Energy	0.88	7.99	6.72	0.05	0.61	0.61
Mobile	103.34	415.42	1,884.87	5.57	387.96	107.60
<b>Total Emissions</b>	<b>122.20</b>	<b>477.33</b>	<b>1,925.08</b>	<b>16.63</b>	<b>390.53</b>	<b>110.18</b>
SMAQMD Threshold	65	65	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	Yes	Yes	N/A	N/A	N/A	N/A
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants. Stationary sources include boilers and emergency generator use. Source: CalEEMod, 2013, USEPA 1995						

#### 4.4.6 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE Construction Emissions

Construction of Alternative E would be similar to Alternative B; however, the location of the site is different. Unmitigated construction emission totals for the Alternative E are shown in **Table 4.4-18** and mitigated emissions are provided in **Table 5-1**.

**TABLE 4.4-18**  
ALTERNATIVE E UNMITIGATED CONSTRUCTION EMISSIONS – DE MINIMIS THRESHOLDS

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
2018	2.17	9.82	10.83	0.02	1.32	0.70
2019	1.11	1.95	2.00	0.004	0.19	0.13
Maximum Year Emissions	2.17	9.82	10.83	0.02	1.32	0.70
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	No	No	N/A	No	No
Notes: N/A = Not Applicable; General Conformity <i>de minimis</i> thresholds are not applicable due to attainment status (Refer to <b>Section 3.4</b> ). Source: CalEEMod, 2013.						

#### General Conformity Determination

As shown in **Table 4.4-18**, emissions of individual criteria pollutants from construction of Alternative E would not exceed General Conformity *de minimis* thresholds; therefore, no general conformity

determination is required. However, to further reduce project-related construction emissions mitigation measures are provided in **Section 5.4.1**.

**SMAQMD Thresholds Compliance**

As shown in **Table 4.4-19**, emissions of ozone precursor NO<sub>x</sub> from construction of Alternative E would exceed the SMAQMD threshold of 85 pounds per day. Mitigation provided in **Section 5.4.1** would minimize ozone precursor emissions from construction of Alternative E and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-19**  
ALTERNATIVE E UNMITIGATED CONSTRUCTION EMISSIONS – SMAQMD THRESHOLD

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
2018	22.51	195.85	272.38	0.52	31.51	14.47
2019	20.99	39.99	41.24	0.08	4.02	2.60
Maximum Day Emissions	22.51	195.85	272.38	0.52	31.51	14.47
SMAQMD Threshold	N/A	85	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	<i>N/A</i>	Yes	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants Source: CalEEMod, 2013.						

**Operational Vehicle and Area Emissions**

Buildout of Alternative E would result in the generation of criteria pollutants similar to Alternative B. Unmitigated operation emission totals for the Alternative E are shown in **Table 4.4-20** and mitigated emissions are provided in **Table 5-2**. Detailed calculations of emissions are included as **Appendix S**.

The PM<sub>2.5</sub> analysis under Alternative A is applicable for Alternative E.

As shown in **Table 4.4-20**, emissions of ozone precursors from operation of Alternative E would exceed the ozone precursor General Conformity *de minimis* thresholds only for NO<sub>x</sub>. Mitigation provided in **Section 5.4.2** would further reduce criteria air pollutant emissions from operation of Alternative E and result in a less than significant adverse effect associated with the regional air quality environment.

As shown in **Table 4.4-20**, emissions of individual criteria pollutants from stationary sources, area, and energy sources would not exceed the Tribal NSR thresholds; therefore, an associated minor new source permit would not be required.

**TABLE 4.4-20**  
ALTERNATIVE E UNMITIGATED OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.29	1.3	4.18	0.19	0.36	0.36
Area	1.35	0.00	0.001	0.00	0.00	0.00
Energy	0.09	0.83	0.69	0.005	0.06	0.06
Mobile	9.51	39.63	164.04	0.52	37.85	10.54
60 Percent Mobile Reduction for CO*			-78.74			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>11.11</b>	<b>41.15</b>	<b>68.71</b>	<b>0.63</b>	<b>38.12</b>	<b>10.81</b>
<i>De Minimis</i> Threshold	25	25	100	N/A	100	100
<i>Exceed</i> Threshold	No	Yes	No	N/A	No	No
Notes: N/A = Not Applicable; levels are not applicable due to attainment status (Refer to Section 3.4); Excludes exempt emissions in accordance with 40 CFR 93.153; *Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Emissions from waste and water are negligible and round to zero. Source: CalEEMod, 2013, USEPA 1995.						

### **General Conformity Determination**

Since Alternative E's project-related direct and indirect emissions occur in a nonattainment area and project-related operational emissions (refer to **Table 4.4-20**) exceed General Conformity *de minimis* thresholds for the ozone precursor NO<sub>x</sub>, a general conformity determination is required prior to the federal action.

### **SMAQMD Thresholds Compliance**

As shown in **Table 4.4-21**, emissions of ozone precursors NO<sub>x</sub> and ROG from operation of Alternative E would exceed the SMAQMD thresholds of 65 pounds per day. Mitigation provided in **Section 5.4.2** would minimize ozone precursor emissions from operation of Alternative E and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-21**  
ALTERNATIVE E UNMITIGATED OPERATIONAL EMISSIONS – SMAQMD THRESHOLD

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
Stationary Sources	2.97	53.92	33.13	11.01	1.97	1.97
Area	7.38	0.0001	0.011	0.00	0.00004	0.00004
Energy	0.50	4.53	3.80	0.03	0.34	0.34
Mobile	84.94	339.64	1,541.40	4.55	316.94	87.91
<b>Total Emissions</b>	<b>95.79</b>	<b>398.09</b>	<b>1,578.35</b>	<b>15.59</b>	<b>319.25</b>	<b>90.22</b>
SMAQMD Threshold	65	65	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	Yes	Yes	N/A	N/A	N/A	N/A
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants. Stationary sources include boilers and emergency generator use. Source: CalEEMod, 2013, USEPA 1995						

#### 4.4.7 ALTERNATIVE F – CASINO RESORT AT MALL SITE

##### Construction Emissions

Construction of Alternative F would be similar to Alternative A; however, the Alternative F would be located approximately six miles north of the Twin Cities site, consist of a slightly larger footprint, and require less on-site fill. Construction is anticipated to begin in 2018 and last approximately 18 months. Construction is assumed to occur 8-hours a day, 5 days a week. Unmitigated construction emission totals for the Alternative F are shown in **Table 4.4-22** and mitigated emissions are provided in **Table 5-1**.

**TABLE 4.4-22**  
ALTERNATIVE F UNMITIGATED CONSTRUCTION EMISSIONS – DE MINIMIS THRESHOLDS

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
2018	4.40	19.21	18.01	0.04	2.99	1.67
2019	2.10	2.80	3.03	0.006	0.33	0.20
Maximum Year Emissions	4.40	19.21	18.01	0.04	2.99	1.67
<i>De Minimis Threshold</i>	25	25	100	N/A	100	100
<i>Exceed Threshold</i>	No	No	No	N/A	No	No
Notes: N/A = Not Applicable; General Conformity <i>de minimis</i> thresholds are not applicable due to attainment status (Refer to <b>Section 3.4</b> ). Source: CalEEMod, 2013.						

##### General Conformity Determination

As shown in **Table 4.4-22**, emissions of individual criteria pollutants from construction of Alternative F would not exceed General Conformity *de minimis* thresholds; therefore, no conformity determination is

required. However, to further reduce project-related construction emissions mitigation measures are provided in **Section 5.4.1**.

**SMAQMD Thresholds Compliance**

As shown in **Table 4.4-23**, emissions of ozone precursor NO<sub>x</sub> from construction of Alternative F would exceed the SMAQMD threshold of 85 pounds per day. Mitigation provided in **Section 5.4.1** would minimize ozone precursor emissions from construction of Alternative F and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-23**  
ALTERNATIVE F UNMITIGATED CONSTRUCTION EMISSIONS – SMAQMD THRESHOLD

Construction Year	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
2018	61.41	287.58	286.05	0.53	45.78	25.24
2019	39.43	59.97	64.81	0.13	6.98	4.14
Maximum Day Emissions	61.41	287.58	286.05	0.53	45.78	25.24
SMAQMD Threshold	N/A	85	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	<i>N/A</i>	Yes	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants Source: CalEEMod, 2013.						

**Operational Vehicle and Area Emissions**

Buildout of Alternative F would result in the generation of criteria pollutants similar to Alternative A. Unmitigated operation emission totals for Alternative F are shown in **Table 4.4-24** and mitigated emissions are provided in **Table 5-2**. Detailed calculations of criteria pollutant emissions are included as **Appendix S**.

The PM<sub>2.5</sub> analysis under Alternative A is applicable for Alternative F.

As shown in **Table 4.4-24**, emissions of ozone precursors from operation of Alternative F would exceed the General Conformity *de minimis* threshold only for NO<sub>x</sub>. Mitigation provided in **Section 5.4.2** would minimize criteria air pollutant emissions from operation of Alternative F and result in a less than significant adverse effect associated with the regional air quality environment.

As shown in **Table 4.4-24**, emissions of individual criteria pollutants from stationary sources, area, and energy sources would exceed the Tribal NSR threshold of 2 tpy for ROG; therefore, an associated minor new source permit may be required. As discussed in **Section 4.4.1**, the Tribe would apply for and obtain a minor NSR permit in accordance with the USEPA guidelines and Tribal NSR regulations. Because the

emission sources are from boilers and emergency generators, it is anticipated that no additional emissions controls will be required by the USEPA to implement the selected alternative.

**TABLE 4.4-24**  
ALTERNATIVE F UNMITIGATED OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.29	1.3	4.18	0.19	0.36	0.36
Area	3.66	0.0004	0.05	0.00	0.00	0.00
Energy	0.21	1.89	1.59	0.011	0.14	0.14
Mobile	12.51	52.49	217.02	0.69	50.18	13.97
48 Percent Mobile Reduction for CO*			-125.87			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>16.67</b>	<b>55.68</b>	<b>96.97</b>	<b>0.89</b>	<b>50.68</b>	<b>14.47</b>
<i>De Minimis Threshold</i>	25	25	No	N/A	100	100
<i>Exceed Threshold</i>	No	Yes	No	N/A	No	No

**General Conformity Determination**

Because project-related direct and indirect emissions occur in a nonattainment area and project-related operational emissions for Alternative F (refer to **Table 4.4-24**) would exceed General Conformity *de minimis* thresholds for the ozone precursor NO<sub>x</sub>, a general conformity determination will be conducted prior to federal action. An updated Draft Conformity Determination that covers Alternative F is included in this Final EIS as **Updated Appendix T**.

**SMAQMD Thresholds Compliance**

As shown in **Table 4.4-25**, emissions of ozone precursors NO<sub>x</sub> and ROG from operation of Alternative F would exceed the SMAQMD thresholds of 65 pounds per day. Mitigation provided in **Section 5.4.2** would minimize ozone precursor emissions from operation of Alternative F and result in a less than significant adverse effect associated with the regional air quality environment.

**TABLE 4.4-25**  
ALTERNATIVE F UNMITIGATED OPERATIONAL EMISSIONS – SMAQMD THRESHOLD

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds per day					
Stationary Sources	2.97	53.92	33.13	11.01	1.97	1.97
Area	20.08	0.003	0.37	0.00	0.001	0.001
Energy	1.14	10.38	8.72	0.06	0.79	0.79
Mobile	103.34	415.42	1,884.87	5.57	387.96	107.60
<b>Total Emissions</b>	<b>127.53</b>	<b>479.71</b>	<b>1,927.08</b>	<b>16.64</b>	<b>390.71</b>	<b>110.36</b>
SMAQMD Threshold	65	65	N/A	N/A	N/A	N/A
<i>Exceed Level</i>	Yes	Yes	N/A	N/A	N/A	N/A
Notes: N/A = Not Applicable; SMAQMD does not publish emissions standards for all criteria pollutants. Stationary sources include boilers and emergency generator use. Source: CalEEMod, 2013, USEPA 1995						

#### 4.4.8 ALTERNATIVE G – NO ACTION

Under the No Action alternative, development of the Twin Cities site and Historic Rancheria site is not reasonably foreseeable. No construction or operational mobile or stationary criteria pollutants or DPM emissions would be generated under this Alternative for those two sites. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses and comparable impacts to air quality would occur as with Alternative F as a result of the No Action alternative.

## 4.5 BIOLOGICAL RESOURCES

This section identifies the direct effects to biological resources that would result from the development of each alternative described in **Section 2.0**. Effects are measured against the environmental baseline presented in **Section 3.5**. Indirect and cumulative effects are identified in **Section 4.14** and **Section 4.15**, respectively. Measures to mitigate for impacts identified in this section are presented in **Section 5.5**.

The purpose of this section is to analyze the potential environmental consequences of project alternatives on biological resources, including wildlife and habitats, federally-listed species, migratory birds, waters of the U.S., and wetland habitats. The analysis of potential effects was based on the biological setting as determined by field surveys conducted by Analytical Environmental Services (AES) in 2013 and 2014; consultation with the United States Fish and Wildlife Service (USFWS); and a review of known literature and data, including the California National Diversity Database (CNDDDB) and California Native Plant Society (CNPS) lists.

### 4.5.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Potential Effects to Habitats

No USFWS designated critical habitat occurs within the Twin Cities site. The nearest USFWS designated critical habitat is located approximately 6.6 miles west (Delta Smelt). The development of the casino/hotel under Alternative A would directly affect approximately 138.56 acres of habitat within the 282-acre Twin Cities site. Most of the habitat disturbance, approximately 138.52 acres, would occur in agricultural areas which have low habitat value; however, Drainage 2 would also be impacted under Alternative A.

Drainage 2 (the manmade agricultural ditch) is the only aquatic area located within the 138.56 acre development impact area. All aquatic habitats as identified in **Section 3.5.2** are slated to be avoided during construction and implementation of Alternative A. The habitats found within the area that would be affected by the construction of Alternative A potentially provide habitat for the species discussed below, but are not in and of themselves listed as critical or sensitive habitats under state or federal designation. No adverse effect to listed critical habitat would occur under Alternative A.

If untreated, wastewater discharge and stormwater runoff from Alternative A could impact water quality in Drainage 1 (Laguna Creek) and indirectly affect downstream designated critical habitat. The stormwater treatment facilities proposed for the Twin Cities site (described in **Section 2.2.5**), including vegetated stormwater treatment swales, would minimize indirect effects to designated critical habitat by ensuring stormwater runoff generated from impervious surfaces is contained and treated prior to surface discharge. Operational activities associated with Alternative A are designed to maintain high water quality standards that will eliminate indirect adverse effects to designated critical habitat by ensuring discharge of high quality water offsite. Implementation of the best management practices identified in

**Section 5.2**, including the protection of downstream waterways from increased flow rates, the control of erosion, minimization of sediment load, and refueling away from waterways, would ensure that construction and operation activities associated with the development of Alternative A would not indirectly affect downstream designated critical habitat for the Delta smelt. Off-site discharge of treated wastewater would occur under Alternative A Wastewater Option 1. Potential on-site disposal of treated wastewater would be in accordance with standards and guidelines as required in the anticipated National Pollutant Discharge Elimination System (NPDES) wastewater discharge permit.

### **Potential Effects to Federally-Listed Species**

As discussed in **Section 3.5.2**, five federally-listed wildlife species have the potential to occur on the Twin Cities site. The Twin Cities site provides potential habitat for Vernal Pool Fairy Shrimp (*Branchinecta lynchi*; VPFS), Vernal Pool Tadpole Shrimp (*Lepidurus packardii*; VPTS), California Tiger Salamander (*Ambystoma californiense*; CTS), Valley Elderberry Longhorn Beetle (*Desmocerus californicus dimorphus*; VELB), and the Giant Garter Snake (*Thamnophis gigas*, GGS).

Potential impacts to these species from the development of Alternative A are described below.

#### ***Branchiopod Species***

VPFS and VPTS have the potential to occur on the Twin Cities site within the 1.79-acre southern wetland and Drainage 3 (southern drainage). Alternative A design avoids the southern wetland features.

Therefore, no adverse effects to VPFS and /or VPTS would occur through the implementation of Alternative A. To further reduce potential impacts to VPFS and /or VPTS, the wetland habitats on the southern portion of the Twin Cities site would be protected by the measures listed in **Section 5.5**, including the implementation of construction buffers.

#### ***California Tiger Salamander***

The Twin Cities site contains Drainage 1, Drainage 3, an approximately 1.79-acre pond, and upland grassland habitat, all of which provide potential habitat for CTS. The water/wetland features and the upland habitat adjacent to the on-site water features would be utilized by CTS or would serve as paths for migration to breeding sites; however, the continuous cultivation practices around the on-site water features, coupled with lack of documented occurrences within the vicinity limits the potential to occur.

Therefore, no adverse effects to CTS would occur through the implementation of Alternative A. To further reduce potential impacts to CTS, the wetland habitats on the Twin Cities site would be protected by the measures listed in **Section 5.5**, including the implementation of construction buffers.

### ***Giant Garter Snake***

Drainage 1, Drainage 3, and the 1.79-acre pond on the Twin Cities site, as well as the associated upland areas, provide potential habitat for GGS. GGS have been documented to occur as close as 0.5 miles northeast of the Twin Cities site in habitat similar to that found on the Twin Cities site. The water/wetland features, Drainage 1, Drainage 3, and the 1.79-acre pond would be fully avoided by Alternative A, as would be any upland habitat adjacent to these water/wetland features. Drainage 2 is not conducive for GGS, due to ongoing agricultural activities, maintenance of Drainage 2, and lack of aquatic species to serve as a food source within the drainage. Therefore, construction activities associated with Alternative A would result in no adverse effects to GGS. To further reduce potential impacts to GGS, mitigation measures identified in **Section 5.5** are recommended.

### ***Valley Elderberry Longhorn Beetle***

One elderberry shrub is located within Drainage 3, to the south of the development area on the Twin Cities site (**Figure 3.5-1**). VELB exit holes were not observed on this shrub. No adverse effects to VELB would occur as the Alternative A development area is located at least 100 feet north of the identified elderberry shrub.

To further reduce potential impacts to VELB, measures listed in **Section 5.5** are recommended.

### **State-Listed Species**

As discussed in **Section 3.5.2**, five State-listed special-status species have the potential to occur on the Twin Cities site; tricolored blackbird (*Agelaius tricolor*), CTS, GGS, Swainson's hawk (*Buteo swainsoni*), and greater sandhill crane (*Grus canadensis tabida*). With the exception of CTS and GGS, analyzed above under federally-listed species, these species are not afforded protection under the Federal Endangered Species Act, but specific State listed species are discussed here based on consultation with cooperating agencies (County and Cities).

### ***Tricolored Blackbird***

Suitable tricolored blackbird nesting and foraging habitat exists on the Twin Cities site. Drainage 1, Drainage 3, and the 1.79-acre southern wetland represent the highest quality on-site habitat for the blackbird. Drainage 2 contains marginal blackbird habitat at best. This drainage is sandwiched between two active agricultural fields, is very narrow, and is thus heavily disturbed. Moreover, Drainage 2 does not provide nearly the amount of the cover and foraging habitat as Drainages 1 and 3 and the wetland, all of which exist outside of the area of impact. Mitigation measures for migratory birds identified in **Section 5.5** and the maintenance of the non-developed portions of the site by project design will ensure the continuance of blackbird nesting and foraging habitat. As such, impacts would be reduced to less than significant levels.

### ***Swainson's Hawk***

Suitable nesting habitat does not occur on the Twin Cities site; however, the site represents suitable foraging habitat. Foraging habitat for the Swainson's hawk includes the riparian corridor along Drainage 1, Drainage 3, and the 1.79-acre southern wetland. These corridors would be avoided by project design. The agricultural fields also provide suitable foraging habitat for the Swainson's hawk; however the development of the gaming facility in the northern portion of the Twin Cities site would not disrupt the foraging value of the fields in the southern portion of the site or the agricultural fields surrounding the site. Swainson's hawk mitigation measures for the impacted portion of the site are identified in **Section 5.5**. This, in combination with the mitigation measures for migratory birds and the maintenance of the non-developed portions of the site by project design, will ensure the continuance of Swainson's hawk foraging habitat. As such, impacts would be reduced to less than significant levels.

### ***Greater Sandhill Crane***

The proposed Alternative A development area on the Twin Cities site does not provide nesting habitat for the greater sandhill crane; however, the agricultural fields within the footprint provide potential winter foraging habitat, although there are no records of greater sandhill crane sightings on the site or in the vicinity. Mitigation measures recommended for Swainson's hawk and nesting migratory birds detailed in **Section 5.5**, plus the maintenance by design of the remaining foraging habitat would reduce potential impacts to the state-listed greater sandhill crane to less than significant levels.

## **Potential Effects to Migratory Birds**

### ***Construction Activities***

Migratory birds and their nests are protected from "take" by the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711), which makes it unlawful to "*pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess. . . or any part, nest, or egg of any such bird*" (50 Code of Federal Regulations (CFR) 10) (USFWS, 2007a). Alternative A could adversely affect active migratory bird nests if vegetation removal or loud noise producing activities associated with Alternative A construction were to occur during the nesting season. This is a potentially significant impact. Potential adverse direct effects to migratory birds and other special-status bird species would be avoided or minimized by implementation of the mitigation measures identified in **Section 5.5**.

### ***Lighting***

Increased lighting could increase collisions of birds with structures, and can also cause a disorientation effect on avian species. Thus, nighttime lighting from the operation of the Alternative A could have a potentially significant impact on both migrating and local bird populations. Mitigation measures to reduce potentially significant nighttime lighting impacts are identified in **Section 5.5**.

### **Potential Effects to Waters of the U.S.**

Waterways/drainages identified within the Twin Cities site were assessed to determine whether these features would potentially be subject to U.S. Army Corps of Engineers (USACE) jurisdiction under Section 404 of the Clean Water Act (CWA); a jurisdictional delineation and verification by USACE will occur to determine jurisdiction over potential waters of the U.S. The following wetlands/waterways/drainages are located on the Twin Cities site, as shown in **Figure 3.5-1**:

- 1) Drainage 1: Laguna Creek, which runs along the northern boundary of the site
- 2) Drainage 2: a man-made agricultural ditch that is unlikely to be jurisdictional water
- 3) Drainage 3: an un-named partially channelized ephemeral drainage which deepens and broadens into a wetland feature
- 4) Wetland/Pond: a 1.79-acre wetland area and pond near the western border of the site to which Drainage 3 flows

A bridge and series of culverts are located along the eastern margin of the Twin Cities site and extend from under Hwy 99 to form several drainages. The bridge and a set of culverts convey stormwater into Drainage 1 on the northern boundary of the site. A set of culverts convey stormwater into Drainage 3, which crosses the site into a 1.79-acre wetland/pond and exits the western site boundary.

Drainage 1 flows east to west along the northern boundary of the Twin Cities site. The creek receives water from up-stream from other named creeks (Skunk Creek, Griffith Creek, Hadselville Creek and Browns Creek). Drainage 1 also receives runoff from upstream properties, which are primarily irrigated agricultural fields to the east of Hwy 99, and treated effluent from the City of Galt Wastewater Treatment Plant (WWTP), located downstream of the site, before draining into the Consumnes River. Drainage 1 (**Figure 3.5-1**) would be considered waters of the U.S and will be avoided during construction and operation of Alternative A as these features are not in the proposed development area.

Drainage 2, which passes through the north central portion of the Twin Cities site, will be directly impacted by construction of Alternative A. Drainage 2, created from uplands, will either be relocated around the development footprint to avoid significant modification of the drainage patterns, or placed in a pipe which will carry the water entering the site to the other side of the property. Due to the nature of Drainage 2, including its reliance upon irrigation water for flows, it is not likely to be classified as a water of the U.S.

Drainage 3, which conveys both on-site and off-site stormwater to the west, shows signs of modification, including channel uniformity, likely implemented to facilitate agricultural water delivery and stormwater diversion. Drainage 3 flows into a 1.79-acre wetland/pond that exits via the western site boundary into a series of modified channels to Drainage 1.

Drainage 3 and the 1.79-acre wetland/pond (**Figure 3.5-1**) are likely to be considered waters of the U.S. Both the wetland/pond and drainage features will be avoided during construction and operation of Alternative A as these features are not in the proposed development area.

Alternative A would not result in an adverse effect to likely waters of the U.S. within the Twin Cities site. Mitigation measures to ensure no adverse effects to wetland features and potential waters of the U.S. are included in **Section 5.5**.

In addition, the Tribe will comply with the mitigation measures identified in **Section 5.2** to prevent discharge of pollutants to surface waters during construction. This includes complying with the United States Environmental Protection Agency (USEPA) NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity and Executive Order 11990, as well as implementing source control and treatment BMPs to prevent pollution of stormwater runoff during operation. A Section 404 permit under the CWA may be necessary if any activity takes place in a wetland or water of the U.S. However, the project has been designed such that a 404 permit will likely not be necessary.

## **4.5.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

### **Potential Effects to Habitats**

Similar to Alternative A, the development of the reduced intensity gaming facility under Alternative B would be located in the northern portion of the Twin Cities site. The amount of grading disturbance from the development of Alternative B is similar to Alternative A (approximately 138.56-acres).

No USFWS critical habitat is located on the Twin Cities site and no adverse effect to critical habitats would occur under Alternative B. Alternative B design and implementation of the best management practices identified in **Sections 5.2**, including the protection of downstream waterways from increased flow rates, the control of erosion, minimization of sediment load, and refueling away from waterways, would ensure that construction and operation activities associated with the development of Alternative B would not indirectly affect downstream designated critical habitats. No off-site discharge of treated wastewater would occur under Alternative B Wastewater Option 1. Potential on-site disposal of treated wastewater would be in accordance with standards and guidelines as required in the anticipated NPDES wastewater discharge permit.

### **Potential Effects to Federally-Listed Species**

Similar to Alternative A, the development of Alternative B has the potential to affect five federally-listed species discussed in **Section 3.5.2**: VPFS, VPTS, CTS, GGS and VELB.

Similar to Alternative A, the potential effects to VPFS, VPTS, CTS, and/or GGS if these species were determined to be present in Drainage 3 (which deepens and broadens into a 1.79-acre wetland/pond) and

associated upland area that is not located within the development footprint of Alternative B. Potential effects to VELB would additionally not occur as the identified elderberry shrub is not located within the development footprint of Alternative B.

Therefore, construction activities associated with Alternative B could result in no adverse effect to VPFS, VPTS, CTS, GGS and VELB. Mitigation measures to ensure no adverse effects to these species are identified in **Section 5.5**.

### **State-Listed Species**

Impacts to state-listed species would be similar when compared to Alternative A. Potentially significant impacts to species would be reduced to a less than significant level by mitigation measures in **Section 5.5**.

### **Potential Effects to Migratory Birds**

#### ***Construction Activities***

Alternative B could adversely affect active migratory bird nests if vegetation removal activities or loud noise associated with project construction were to occur during the nesting season. Development of Alternative B may have moderate direct adverse effects on nesting migratory birds. The aspects of overall project design and recommended mitigation in **Section 5.5** would reduce potentially significant effects to less than significant levels.

#### ***Lighting***

Increased lighting could increase collisions of birds with structures, and can cause a disorientation effect on avian species. Thus, nighttime lighting from the operation of the gaming facility proposed under Alternative B could have a potentially significant impact on both migrating and local bird populations. Mitigation measures to reduce potentially significant nighttime lighting impacts are identified in **Section 5.5**.

### **Potential Effects to Waters of the U.S.**

The construction of Alternative B would maintain a similar configuration as Alternative A and result in the avoidance of the on-site wetland, Drainage 1, and Drainage 3. The development of Alternative B would result in the same impacts identified for Alternative A.

Alternative B design would not result in an adverse effect to likely waters of the U.S. within the Twin Cities site. Mitigation measures to ensure no adverse effects to the wetland features and potential waters of the U.S. are included in **Section 5.5**. In addition, the Tribe will comply with the mitigation measures identified in **Section 5.2** to prevent discharge of pollutants to surface waters during construction.

### 4.5.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE

#### Potential Effects to Habitats

Similar to Alternative A, the development of the non-gaming alternative under Alternative C would be located in the northern portion of the Twin Cities site. The amount of grading disturbance from the development of Alternative C is similar to Alternative A (approximately 138.56-acres).

No USFWS critical habitat is located on the Twin Cities site and no adverse effect to these habitats would occur under Alternative C. Alternative C design and implementation of the best management practices identified in **Sections 5.2**, including the protection of downstream waterways from increased flow rates, the control of erosion, minimization of sediment load, and refueling away from waterways, would ensure that construction and operation activities associated with the development of Alternative C would not indirectly affect downstream designated critical habitat for the Delta Smelt.

#### Potential Effects to Federally-Listed Species

Similar to Alternative A, the development of the non-gaming alternative under Alternative C has the potential to affect five federally-listed species discussed in **Section 3.5.2**: VPFS, VPTS, CTS, GGS and VELB.

Similar to Alternative A, the potential effects to VPFS, VPTS, CTS, and/or GGS if these species were determined to be present within Drainage 3 (which deepens and broadens into a 1.79-acre wetland/pond) and associated upland area that is not located within the development footprint of Alternative C. Potential effects to VELB would additionally not occur as the identified elderberry shrub is not located within the development footprint of Alternative C.

Therefore, construction activities associated with Alternative C could result in no adverse effect to VPFS, VPTS, CTS, GGS and VELB. Mitigation measures to ensure no adverse effects to these species are identified in **Section 5.5**.

#### State-Listed Species

Impacts to state-listed species would be similar when compared to Alternative A. Potentially significant impacts to species would be reduced to a less than significant level by mitigation measures in **Section 5.5**.

#### Potential Effects to Migratory Birds

##### **Construction Activities**

Alternative C could adversely affect active migratory bird nests if vegetation removal activities or loud noise associated with project construction were to occur during the nesting season. Development of Alternative B may have moderate direct adverse effects on nesting migratory birds. The aspects of

overall project design and recommended mitigation in **Section 5.5** would reduce potentially significant effects to less than significant levels.

**Lighting**

Increased lighting could increase collisions of birds with structures, and can cause a disorientation effect on avian species. Thus, nighttime lighting from the operation of the non-gaming alternative proposed under Alternative C could have a potentially significant impact on both migrating and local bird populations. However, due to the fact that the non-gaming development would not include 24 hour operation and no multi story structures are proposed, a less than significant effect to migratory birds would occur from new lighting associated with Alternative C. To further reduce these less than significant effects, mitigation measures to are identified in **Section 5.5** to reduce potential bird collisions.

**Potential Effects to Waters of the U.S.**

The construction of Alternative C would maintain a similar configuration as Alternative A and result in the avoidance of the on-site wetland, Drainage 1, and Drainage 3. The development of Alternative C would result in the same impacts identified for Alternative A.

Alternative C design would not result in an adverse effect to likely waters of the U.S. within the Twin Cities site. Mitigation measures to ensure no adverse effects to the wetland features and potential waters of the U.S. are included in **Section 5.5**. In addition, the Tribe will comply with the mitigation measures identified in **Section 5.2** to prevent discharge of pollutants to surface waters during construction.

**4.5.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE**

**Potential Effects to Habitats**

**Table 4.5-1** provides a summary of the impact acreage of each habitat type identified on the Historic Rancheria. Most of the habitat disturbed through the development of Alternative D would occur in grassland habitat.

**TABLE 4.5-1**  
ANTICIPATED EFFECTS TO HABITAT TYPES – ALTERNATIVE D

Habitat Type	Acres
Grassland	55.68
Historic Stock Pond	2.29
Ruderal/Developed	11.51
Riparian	2.77
Wetland	2.29
Source: AES Site Visit, 2014.	

No USFWS identified critical habitat is located within the Historic Rancheria site. Designated critical habitat for Central Valley Chinook Salmon and Central Valley Steelhead within the Cosumnes River is located downstream of the site. No development impacts associated with Alternative D would occur within the Cosumnes River or its riparian corridor.

As discussed in **Section 3.5.3**, agricultural lands represent suitable foraging habitat for several migratory bird species; however, agricultural land is relatively abundant on a local and regional scale. The habitats found within the area that would be affected by the construction of Alternative D potentially provide habitat for the species discussed below, but are not in and of themselves listed as critical or sensitive habitats under federal or state designation. No adverse effect to listed critical habitat would occur under Alternative D.

If not properly treated, wastewater discharge and stormwater runoff from Alternative D could impact water quality in the Cosumnes River and indirectly affect downstream designated critical habitat. The stormwater treatment facilities proposed for the Historic Rancheria site, including vegetated stormwater treatment swales, would minimize indirect effects to the river by ensuring stormwater runoff generated from impervious surfaces is contained and treated prior to surface discharge. Operational activities associated with Alternative D are designed to maintain high water quality standards that will eliminate indirect adverse effects to the river by ensuring discharge of high quality water offsite. Implementation of the best management practices identified in **Sections 5.2**, including the protection of downstream waterways from increased flow rates, the control of erosion, minimization of sediment load, and refueling away from waterways, would ensure that construction and operation activities associated with the development of Alternative D would not indirectly affect downstream designated critical habitat. Off-site discharge of treated wastewater would occur under Alternative D, in accordance with standards and guidelines as required in the anticipated NPDES wastewater discharge permit.

### **Potential Effects to Federally-Listed Species**

As discussed in **Section 3.5.3**, eight federally-listed wildlife species have the potential to occur on the Historic Rancheria site, including VPFS, VPTS, CTS, GGS, VELB, California Red-legged Frog (*Rana draytonii*, CRLF), Central Valley steelhead (*Oncorhynchus mykiss*), Central Valley spring run Chinook salmon and winter-run Chinook salmon (*Oncorhynchus tshawytscha*). These species and their potential to occur on the Historic Rancheria site are discussed in detail below.

#### ***Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp***

VPFS/VPTS are known to utilize aquatic habitats similar to the seasonally wetted area associated with the intermittent seasonal wetland present within the northeastern portion of the Historic Rancheria site. The current site plan for Alternative D places the wastewater treatment plant within the wetland. For full avoidance, construction activities require a 250-foot buffer around wetland habitat for these species. The site does not provide adequate space in and around the wetland habitat; this would have the potential to

adversely affect this species. Therefore, the construction of Alternative D could adversely affect VPFS/VPTS. Adverse effects to VPFS or VPTS would be minimized and reduced to less than significant through implementation of the mitigation measures identified in **Section 5.5**.

### ***California Tiger Salamander***

The seasonally wetted area associated with the historic stock ponds within the southeastern portion of the site and the intermittent seasonal wetland northeastern corner of the Historic Rancheria site as well as grassland habitat found throughout the site can provide potential habitat for CTS. Upland habitat adjacent to the water features present on the site may additionally contain burrows utilized by CTS. Even though there are no CNDDDB occurrences documented to occur within the 5-mile radius surrounding the Historic Rancheria site, there is a potential for CTS to occur on the property. Therefore, the construction of Alternative D could adversely affect CTS. To reduce potential impacts to CTS, the measures listed in **Section 5.5** are recommended.

### ***Giant Garter Snake***

The seasonally wetted area associated with the historic stock ponds on the southeastern portion of the Historic Rancheria site, as well as grassland habitat found throughout the site can provide potential marginal habitat for GGS. Due to the location of proposed facilities associated with Alternative D, GGS have the potential to be adversely affected. Adverse effects to GGS will be minimized by implementation of the mitigation measures identified in **Section 5.5**.

### ***Valley Elderberry Longhorn Beetle***

The elderberry shrubs within the Historic Rancheria site provide potential habitat for VELB. Elderberry shrub clusters were observed within the riparian habitat along the northern portion of the Historic Rancheria site and within the nonnative grassland/pastureland within the northeastern portion of the site, as shown in **Figure 3.5-3**. The development of Alternative D within the northeastern portion of the site is planned for the wastewater treatment plant and pipeline to the Cosumnes River. VELB have the potential to be adversely affected by the development of Alternative D. Any adverse effects to VELB will be minimized by avoidance and implementation of the mitigation measures identified in **Section 5.5**.

### ***California Red-Legged Frog***

Reaches of the Cosumnes River east of the Historic Rancheria site are within the Cosumnes River Recovery Unit boundaries for CRLF; however, the site is not within these boundaries. Although there have been no documented occurrences of CRLF in the vicinity of the Historic Rancheria site, the development of Alternative D could adversely affect CRLF should it be determined that CRLF occupy the stock pond or upland areas on the Historic Rancheria site.

Therefore, construction activities associated with Alternative D could result in adverse effects to CRLF. Potential adverse direct effects to CRLF would be avoided or minimized by implementation of the mitigation measures identified in **Section 5.5**.

### ***Fish Species***

Central Valley steelhead, spring-run Chinook salmon, and winter-run Chinook salmon are known to occur within the Cosumnes River. The Cosumnes River is classified as “accessible” by California Department of Fish and Wildlife (CDFW) in its CalFish BIOS passage database (CalFish, 2014). No direct impacts to fish species would occur, as development of Alternative D would not occur within the Cosumnes River or its riparian corridor. A discussion of critical and Essential Fish Habitat (EFH) is provided above under Critical Habitat. No adverse effects to listed fish species would occur during construction of Alternative D. To further reduce potential impacts to these species, the Cosumnes River would be protected by the measures listed in **Section 5.5**, including the implementation of construction buffers.

The construction of Alternative D would increase impervious surfaces on the site, resulting in the potential increase of stormwater and effluent discharge to the Cosumnes River, which poses potential impacts to special-status fish species that reside in the waterway. Provisions to minimize impacts to the Cosumnes River include a project design with a minimum 50-foot buffer along the waterway and the implementation of a tertiary wastewater treatment process (Membrane Bioreactor (MBR) treatment) that would exceed those used by most municipal wastewater treatment plants.

Stormwater and effluent discharge mitigation measures are identified in **Section 5.3** to ensure impacts remain less than significant.

### **State-Listed Species**

As discussed in **Section 3.5.3**, six State special-status species have the potential to occur on the Historic Rancheria site: CTS, Swainson’s hawk (*Buteo swainsoni*), the spring and winter run Chinook salmon, bank swallow (*Riparia riparia*), and GGS. With the exception of CTS, the salmon species, and GGS, which are analyzed above under federally-listed species, these species are not afforded protection under the Federal Endangered Species Act, but specific State listed species are discussed here based on consultation with cooperating agencies (County and Cities).

#### ***Swainson’s Hawk***

Suitable nesting habitat on the Historic Rancheria site is located within the riparian corridor along the Cosumnes River. This riparian corridor would be avoided by project design. The grassland provides suitable foraging habitat for the Swainson’s hawk; however the development of Alternative D would not disrupt the foraging value of the agricultural fields and grassland surrounding the site. Swainson’s hawk mitigation measures site are identified in **Section 5.5**. These, in combination with the mitigation

measures for migratory birds, would reduce potential impacts to Swainson's hawk to less than significant levels.

### ***Bank Swallow***

The proposed Alternative D development area on the Historic Rancheria site does not provide habitat for the bank swallow, however the Cosumnes River and associated banks provide habitat. Alternative D would not impact the riparian corridor and no adverse effect to bank swallows would occur. Mitigation measures identified in **Section 5.5** for migratory birds would further reduce potential impacts to the bank swallow.

## **Potential Effects to Migratory Birds**

### ***Construction Activities***

The grassland and riparian areas on the Historic Rancheria site provide habitat for nesting migratory birds and raptors. If vegetation-clearing activities occur within the nesting season, development of Alternative D could adversely impact nesting activity. Potential adverse effects to nesting migratory birds and raptors as a result of developing Alternative D will be reduced to less than significant levels by implementation of the mitigation measures identified in **Section 5.5**.

### ***Lighting***

Increased lighting may increase collisions of birds with structures, and can also cause a disorientation effect on avian species. Thus, nighttime lighting from the operation of the gaming facility proposed under Alternative D could have a potentially significant impact on both migrating and local bird populations on the Historic Rancheria site. Mitigation measures to reduce potentially significant nighttime lighting impacts are identified in **Section 5.5**.

## **Potential Effects to Waters of the U.S.**

Waterways identified within the Historic Rancheria site were assessed to determine whether these features would potentially be subject to USACE jurisdiction under Section 404 of the CWA. The results are considered preliminary until the USACE verifies the findings or renders a Jurisdictional Determination. The informal delineation identified the Cosumnes River and the intermittent seasonal wetland as the only waters of the U.S. on the site. The construction of the casino/hotel proposed under Alternative D has been designed to avoid direct impacts to the Cosumnes River and the intermittent seasonal wetland.

Alternative D would not result in an adverse impact to potential waters of the U.S. within the Historic Rancheria site. Mitigation measures are provided in **Section 5.5** to further ensure adverse effects to the Cosumnes River and the intermittent seasonal wetland do not occur. In addition, the Tribe will comply

with the mitigation measures identified in **Section 5.2** to prevent discharge of pollutants to surface waters during construction.

#### **4.5.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

##### **Potential Effects to Habitats**

The development of the reduced intensity alternative would be located in the same portion of the Historic Rancheria site as describe above under Alternative D. The amount of grading disturbance from the development of Alternative E is similar to Alternative D (approximately 74.54-acres).

No USFWS critical habitat is located on the Historic Rancheria site and no adverse effect to these habitats would occur under Alternative E. Alternative E design and implementation of the best management practices identified in **Sections 5.2** including the protection of downstream waterways from increased flow rates, the control of erosion, minimization of sediment load, and refueling away from waterways, would ensure that construction and operation activities associated with the development of Alternative E would not indirectly affect downstream designated critical habitats. Off-site discharge of treated wastewater would occur under Alternative E. Potential on-site disposal of treated wastewater would be in accordance with standards and guidelines as required in the anticipated NPDES wastewater discharge permit.

##### **Potential Effects to Federally-Listed Species**

Similar to Alternative D, the development of the reduced intensity gaming facility on the Historic Rancheria site (Alternative E) has the potential to result in adverse effects to eight federally-listed species discussed in **Section 3.5.3**: VPFS, VPTS, CTS, GGS, VELB, CRLF, Central Valley steelhead (*Oncorhynchus mykiss*), Central Valley spring run Chinook salmon and winter-run Chinook salmon (*Oncorhynchus tshawytscha*).

Similar to Alternative D, direct effects may occur to VPFS, VPTS, CTS, GGS, and CRLF if these species were determined to be present within the intermittent seasonal wetland, historic stock ponds, and associated upland area that are located in the proposed Alternative E construction footprint (**Figure 3.5-3**).

No direct impacts to fish species or their habitat would occur, as development of Alternative E will not occur within the Cosumnes River or its riparian corridor. Potential effects to VELB would additionally not occur as the identified elderberry shrubs (**Figure 3.5-3**) are not located within the development footprint of Alternative D.

Therefore, construction activities associated with Alternative E could result in adverse effects to VPFS, VPTS, CTS, GGS, and CRLF. Potential adverse direct effects to these species would be minimized by implementation of the mitigation measures identified in **Section 5.5**.

## State-Listed Species

Impacts to state-listed species would be similar when compared to Alternative D. Potentially significant impacts to species would be reduced to a less than significant level by mitigation measures in **Section 5.5**.

## Potential Effects to Migratory Birds

### *Construction Activities*

The grassland and riparian areas on the Historic Rancheria site provide habitat for nesting migratory birds and raptors. Alternative E could adversely affect active migratory bird nests if vegetation removal activities or loud noise associated with project construction occur during the nesting season. This is potentially a significant impact. Potential adverse direct effects to migratory birds and other special-status species will be avoided or minimized by implementation of the mitigation measures identified in **Section 5.5**.

### *Lighting*

Increased lighting could increase collisions of birds with structures, and can cause a disorientation effect on avian species. Thus, nighttime lighting from the operation of the Alternative E could have a potentially significant impact on both migrating and local bird populations. Mitigation measures to reduce potentially significant nighttime lighting impacts are identified in **Section 5.5**.

## Potential Effects to Waters of the U.S.

The construction of Alternative E would maintain a similar configuration as Alternative D and result in the avoidance of the Cosumnes River and the intermittent seasonal wetland. The development of Alternative E would result in the same impacts identified for Alternative D.

Alternative E design would not result in an adverse impact to likely waters of the U.S. within the Historic Rancheria site. Mitigation measures are provided in **Section 5.5** to further ensure adverse effects to the Cosumnes River and the intermittent seasonal wetland do not occur. In addition, the Tribe will comply with the mitigation measures identified in **Section 5.2** to prevent discharge of pollutants to surface waters during construction.

## 4.5.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE

### Potential Effects to Habitats

The terrestrial habitat type on the Elk Grove Mall site (Mall site) has been identified as ruderal/developed. No USFWS identified critical habitat is located within the Mall site and no adverse effect to these habitats would occur under Alternative F.

### **Potential Effects to Federally-Listed Species**

As discussed in **Section 3.5.4**, based on a review of the USFWS list of federally-listed species and a field survey, no suitable habitat for special-status species is located on the Mall site. Because no federally-listed endangered, threatened, or candidate species occur within the Mall site, none would be adversely affected by Alternative F.

### **State-Listed Species**

As discussed in **Section 3.5.3**, no State-listed special-status species have the potential to occur on the Mall site.

### **Potential Effects to Migratory Birds**

#### ***Construction Activities***

The vegetated portions of the ruderal/developed habitat and the partially developed structures on the Mall site provide habitat for nesting migratory birds and raptors. If construction activities occur within the nesting season, development of Alternative F could adversely impact nesting activity. Potential adverse effects to nesting migratory birds and raptors as a result of developing Alternative F will be reduced to less than significant levels by implementation of the mitigation measures identified in **Section 5.5**.

#### ***Lighting***

Increased lighting could increase collisions of birds with structures, and can also cause a disorientation effect on avian species. Thus, nighttime lighting from the operation of the gaming facility proposed under Alternative F could have a potentially significant impact on both migrating and local bird populations on the Mall site. Mitigation measures to reduce potentially significant nighttime lighting impacts are identified in **Section 5.5**.

### **Potential Effects to Waters of the U.S.**

No jurisdictional waters of the U.S. are located on the Mall site and no adverse effects would occur under Alternative F.

### **4.5.7 ALTERNATIVE G – NO ACTION**

Existing biological resources would remain as-is in the near-term and habitats would not be disturbed under the No Action alternative for the Twin Cities site and the Historic Wilton Rancheria site. Because these habitats would not be disturbed, it is assumed that all existing plant and animal species would continue to remain undisturbed and a less than significant effect to biological resources would result for these two sites. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts to biological resources would occur as with Alternative F as a result of the No Action alternative.

## 4.6 CULTURAL AND PALEONTOLOGICAL RESOURCES

This section assesses the significance of the direct effects to cultural resources that would result from the development of each alternative described in **Chapter 2.0**. Effects are measured against the environmental baseline presented in **Section 3.6**. A significant effect would occur if the implementation of a project alternative resulted in physical destruction, alteration, removal, neglect, or change in characteristics or reduction of integrity of historic features of a cultural resource. A significant effect to paleontological resources would occur if a project alternative directly or indirectly destroyed such a resource. Cumulative and indirect effects are identified in **Section 4.15** and **Section 4.14**, respectively. Measures to mitigate for adverse effects identified in this section are presented in **Section 5.6**.

### 4.6.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Cultural Resources

There are no known cultural resources within the area proposed for development. As described in **Section 3.6**, an archaeological investigation of the Twin Cities area of potential effect (APE) (Analytical Environmental Services (AES), 2014a) revealed three previously unrecorded historic properties within the southern portion of the Twin Cities site, consisting of two single-family residences and two concrete-lined privy pits and associated items located outside of the development area. Given the absence of cultural resources in the proposed development area, there would be no direct adverse effects to known cultural resources as a result of Alternative A. Alternative A is in compliance with Section 106 of the National Historic Preservation Act (NHPA) (40 Code of Federal Regulations (CFR) 1508.27 (b)(8)).

There is a slight possibility that previously unknown cultural resources would be encountered during ground disturbing activities associated with Alternative A. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated archaeological discoveries. Therefore, Alternative A would not result in significant adverse effects to unknown archaeological resources after mitigation.

#### Paleontological Resources

No paleontological resources have been reported or observed on or in the vicinity of the Twin Cities site. Therefore, Alternative A would not result in significant adverse effects to known paleontological resources. There is a low possibility that previously unknown paleontological resources would be discovered during earthmoving activities. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries which would ensure that Alternative A would not result in significant adverse effects to previously unknown paleontological resources under Section 101 (b)(4) of the National Environmental Policy Act (NEPA) (40 CFR 1500 1508).

## 4.6.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO

### Cultural Resources

Similar to Alternative A, the construction of Alternative B would not result in significant adverse effects to known historic properties on the Twin Cities site, as discussed above in **Section 4.6.1**. Mitigation measures for Alternative B presented in **Section 5.6** provide for the treatment of unanticipated cultural resources discovered during project related construction. With the implementation of these mitigations measures, Alternative B would not result in significant adverse effects to previously unknown cultural resources.

### Paleontological Resources

As with Alternative A, no paleontological resources have been reported or observed on or in the vicinity of the Twin Cities site. Therefore, the development of Alternative B would not result in significant adverse effects to known paleontological resources. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries. Thus, with the implementation of this measure, Alternative B would have no effect on known paleontological resources under NEPA Section 101 (b)(4) (40 CFR 1500 1508).

## 4.6.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE

### Cultural Resources

As with Alternative A and B, the current project design of Alternative C would not result in significant adverse effects to known historic properties on the Twin Cities site. Mitigation measures for Alternative C are the same as those presented in **Section 5.6** for Alternative A for the treatment of unanticipated cultural resources discovered during project related construction. With the implementation of these mitigations measures, the construction of Alternative C would not result in significant adverse effects to previously unknown cultural resources.

### Paleontological Resources

As with Alternative A, no paleontological resources have been reported or observed on or in the vicinity of the Twin Cities site. Therefore, Alternative C would not result in significant adverse effects to previously known paleontological resources. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries. Thus, with the implementation of this measure, Alternative C would not result in significant adverse effects to previously undocumented paleontological resources under NEPA Section 101 (b)(4) (40 CFR 1500 1508).

#### 4.6.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE

##### Cultural Resources

A barn and a chicken coop were identified as previously unrecorded historic properties within the Historic Rancheria site, as described in **Section 3.6** (AES, 2014b). Neither structure possesses the values that would make them eligible for listing on the National Register; therefore, no historic properties would be affected as a result of Alternative D.

There is the possibility that previously unknown cultural resources could be encountered during ground disturbing activities on the Historic Rancheria site. The disturbance of a resource would create a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated archaeological discoveries. Therefore, with the implementation of mitigation, Alternative D would not result in significant adverse effects to unknown archaeological resources.

##### Paleontological Resources

No paleontological resources have been reported or observed on or in the vicinity of the Historic Rancheria site. Therefore, Alternative D would not result in significant adverse effects to known paleontological resources. There is a low possibility that previously unknown paleontological resources would be discovered during earthmoving activities. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries which would ensure that Alternative D would not result in significant adverse effects to previously unknown paleontological resources under NEPA Section 101 (b)(4) (40 CFR 1500 1508).

#### 4.6.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE

##### Cultural Resources

Similar to Alternative D, the current project design of Alternative E would be located in an area with two documented historic properties. Therefore, an adverse effect to National Register eligible or listed properties may occur as a result of Alternative E. Mitigation measures are presented in **Section 5.6** to address this potential impact.

In addition, mitigation measures for Alternative E are presented in **Section 5.6** for the treatment of unanticipated cultural resources discovered during construction. With the implementation of these mitigations measures, Alternative E would not result in significant adverse effects to previously unknown cultural resources.

##### Paleontological Resources

As with Alternative D, no paleontological resources have been reported or observed on or in the vicinity of the Historic Rancheria site. Therefore, Alternative E would not result in significant adverse effects to previously known paleontological resources. Mitigation measures are presented in **Section 5.6** for the

treatment of unanticipated paleontological discoveries. Thus, with the implementation of this measure, Alternative E would not result in significant adverse effects to previously undocumented paleontological resources under NEPA Section 101 (b)(4) (40 CFR 1500 1508).

#### **4.6.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

##### **Cultural Resources**

There were no cultural resources discovered during an archaeological investigation of the City of Elk Grove Mall site (Mall site) APE, as described in **Section 3.6** (AES, 2014c). Given the lack of known resources and the prior development of the Mall site, there would be no direct adverse effects to known National Register eligible or listed properties as a result of development of Alternative F. Alternative F is in compliance with Section 106 of the NHPA (40 CFR 1508.27 (b)(8)).

There is a slight possibility that previously unknown cultural resources would be encountered during ground disturbing activities. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated archaeological discoveries. Therefore, with the implementation of this measure, Alternative F would not result in significant adverse effects to unknown archaeological resources.

##### **Paleontological Resources**

No paleontological resources have been reported or observed on or in the vicinity of the Mall site. Therefore, Alternative F would not result in significant adverse effects to known paleontological resources. There is a low possibility that previously unknown paleontological resources would be discovered during earthmoving activities. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries which would ensure that Alternative F would not result in significant adverse effects to previously unknown paleontological resources under NEPA Section 101 (b)(4) (40 CFR 1500 1508).

#### **4.6.7 ALTERNATIVE G – NO ACTION**

Existing cultural resources would remain as-is in the near-term and would not be disturbed at the Twin Cities site and the Historic Wilton Rancheria site. For these two site, the No Action alternative would not result in any significant adverse effects to cultural or paleontological resources in the near-term. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts to cultural resources would occur as with Alternative F at the Elk Grove Mall site as a result of the No Action alternative.

## 4.7 SOCIOECONOMIC CONDITIONS

This section identifies socioeconomic effects anticipated to result from the development of each alternative described in **Section 2.0**. Effects are evaluated against the baseline presented in **Section 3.7**. Specific indirect and cumulative effects are identified in **Section 4.14** and **Section 4.15**, respectively. Measures to avoid, minimize, and mitigate for adverse effects identified in this section are presented, if applicable, in **Section 5.7**.

### Assessment Criteria

#### *Socioeconomic Impacts*

To determine the potential effects of the alternatives associated with socioeconomic conditions, the economic effects of temporary construction and ongoing operational activities of each alternative were evaluated. Because socioeconomic effects would be most pronounced in the vicinity of the project site, the scope of analysis focuses on impacts to the site and surrounding areas of the City of Galt, Sacramento County, and the City of Elk Grove.

Impacts from construction would be a one-time occurrence, while those from operation would be generated continuously after opening. An adverse economic, fiscal, or social impact would occur if the effect of the project were to negatively alter the ability of governments to perform at existing levels, or alter the ability of people to obtain public health and safety services. Much of the analysis presented herein relies on data presented in the *Economic Impact Statement for Wilton Rancheria*, included as **Appendix H**, as well as the *Wilton Rancheria Economic Background and Competitive Effects Study* included as **Appendix U**.

Because all three sites are located within the same region of Sacramento County, and the Twin Cities site is close to the border of San Joaquin County, one approach is to define the primary region of economic impact as both Sacramento County and San Joaquin County, hereinafter referred to as the "Counties."

A second approach is to define the primary region of economic impact as the City of Galt. This second approach was employed specifically for those alternatives situated on the Twin Cities site (Alternatives A, B, and C), which is located just north of the City of Galt, but within the current sphere of influence of the city. This second approach is useful for isolating those impacts that would likely occur approximately within the City of Galt limits. However, there are some limitations to this method.

First, the Twin Cities site is located north of the existing city limits of Galt, but within the City of Galt's sphere of influence. The IMPLAN model, which was employed for this second approach, typically assumes that the prospective project under evaluation is situated within the area or region that is affected. In this case, the Twin Cities site is not within the city limits of Galt, but is close to the city limits. Economic impacts, both positive and negative, are typically inversely related to the distance between the

location of a prospective project, and the area under study. Because the Twin Cities site is slightly north of Galt's city limits, the estimated City of Galt economic effects discussed herein may be slightly overstated.

Second, the alternatives that would occur at the Twin Cities site are relatively large in proportion to the size and population of the City of Galt, and Alternatives A and B are concentrated in the gaming sector, an industry that does not currently exist within the City of Galt. The IMPLAN model allocates operational effects within geographic regions based, in part, on the current mix of businesses and workers within these regions. Because both the businesses and mix of worker skills that reside within the city limits of Galt are less diverse than those that exist in the Counties, the actual operational effects that would occur within the city limits of Galt may be greater or lesser than those estimated by the IMPLAN model that are discussed herein.

Finally, IMPLAN data sets are available by ZIP code. In this circumstance, the dataset for ZIP code 95632 was selected as that most representative of the economic events that would occur within Galt city limits. IMPLAN describes the economic areas as the "study area" for the IMPLAN model. Because there are slight differences between the constituent parts of ZIP code 95632 and Galt city limits, there may be differences between the IMPLAN results described herein, and the actual economic transactions that take place within Galt city limits. As described in Appendix H, a gravity model was applied to the resulting IMPLAN model output to estimate the effects that would occur within the Galt City limits. The population of the City of Galt was used as an input to this gravity model.

### ***Environmental Justice Impacts***

To determine the impacts of the alternatives on environmental justice, the location and status of minority and low-income communities of concern, as identified in **Section 3.7**, are compared to the effect and nature of each alternative's impacts. An adverse environmental justice impact would result if any adverse impact within the scope of this document disproportionately affected an identified minority or low-income community or Native American tribe. The document *Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses* provides the following direction on how to analyze the impacts of actions on low-income and minority populations:

“Under National Environmental Policy Act (NEPA), the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population” (USEPA, 1998).

## 4.7.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

### Economic Effects

Expenditures on goods and services for construction and operational activities would generate substantial direct economic output, as well as indirect and induced economic output. Output is defined as the total value of all goods and services produced at the establishment or construction site. Direct output would result from money spent on activities for construction and operational activities of the project. Indirect output would result from expenditures on goods and services by businesses that receive funds directly from the construction and operation of Alternative A. Induced output would result from expenditures on goods and services by employees directly generated from construction and operation of Alternative A.

### Construction

Expenditures on goods and services from the construction of Alternative A were calculated from estimated costs for construction, investment in furniture, fixture and equipment, various business and consulting fees, and pre-opening expenses. Construction is anticipated to last approximately 18 months. **Table 4.7-1** details the construction impact for the various alternatives. As discussed above, the "study area" as defined in the IMPLAN model was designated as the counties of Sacramento and San Joaquin.

**TABLE 4.7-1**  
ONE-TIME CONSTRUCTION ECONOMIC IMPACT (MILLIONS) –  
SACRAMENTO AND SAN JOAQUIN COUNTIES

	Alternatives					
	A	B	C	D	E	F
Development Budget	\$341.6	\$225.9	\$266.8	\$348.2	\$232.4	\$319.0
<b>Direct Output (Industry)</b>						
Construction	\$266.6	\$162.0	\$233.3	\$273.2	\$168.5	\$244.0
Manufacturing	\$9.5	\$2.1	\$9.5	\$9.5	\$2.1	\$9.5
Wholesale Trade	\$0.9	\$0.7	\$0.9	\$0.9	\$0.7	\$0.9
Scientific/Technical Services	\$5.0	\$5.0	\$5.0	\$5.0	\$5.0	\$5.0
Direct Total	\$282.0	\$170.0	\$248.7	\$288.6	\$176.3	\$259.4
<b>Other Output</b>						
Indirect	\$71.9	\$43.3	\$63.4	\$73.7	\$45.0	\$66.1
Induced	\$80.4	\$49.2	\$70.8	\$82.4	\$51.1	\$73.9
<b>Total Output</b>	<b>\$434.4</b>	<b>\$262.4</b>	<b>\$382.8</b>	<b>\$444.6</b>	<b>\$272.4</b>	<b>\$399.4</b>
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to exactly equal the number given in the Total. Source: <b>Appendix H</b> - Economic Impact Statement for Wilton Rancheria.						

The total cost to develop Alternative A is estimated at \$341.6 million (**Appendix H**), which is expected to generate a one-time total output of approximately \$434.4 million within the Counties (**Table 4.7-1**; **Appendix H**). Direct output is estimated to total approximately \$282.0 million, indirect output will be approximately \$71.9 million, and induced output is estimated at \$80.4 million. Direct output is centered

within the construction industry, while indirect and induced output would be dispersed and distributed among a variety of different industries and businesses in the Counties.

Because Alternative A is located in Sacramento County, and because Sacramento County is larger than San Joaquin County in terms of populations and economic activity, Alternative A will have a disproportional impact on Sacramento County. Specifically, it is estimated that approximately 75 percent of the construction and operational output described above will accrue to Sacramento County and approximately 25 percent will accrue to San Joaquin County (**Appendix H**). These same percentages apply to the allocation of effects for Alternatives B and C because these alternatives are also located at the Twin Cities site.

Construction of Alternative A would also generate substantial output to businesses within the city limits of the City of Galt. Similar to the effect upon the Counties, some of the direct output of the project would flow to the City of Galt businesses, which would in turn increase their spending and labor demand, thereby further simulating the City of Galt economy. As shown in **Table 4.7-2**, under Alternative A, total construction related direct, indirect and induced output are estimated at \$53.5 million, \$5.2 million and \$7.1 million, respectively within the City of Galt.

**TABLE 4.7-2**  
ONE-TIME CONSTRUCTION ECONOMIC IMPACT (MILLIONS) – CITY OF GALT

	Alternatives		
	A	B	C
Development Budget	\$341.6	\$225.9	\$266.8
Direct Output (Industry)	\$53.5	\$32.6	\$46.9
Indirect Output	\$5.2	\$3.1	\$4.5
Induced Output	\$7.1	\$4.3	\$6.2
<b>Total Output</b>	<b>\$65.8</b>	<b>\$40.0</b>	<b>\$57.6</b>
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to exactly equal the number given in the Total. Source: <b>Appendix H</b> - Economic Impact Statement for Wilton Rancheria.			

Construction of Alternative A would generate substantial output to a variety of businesses in the City of Galt and the Counties. Output received by area businesses would in turn increase their spending and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact.

**Operation**

Expenditures on goods and services from the operation of Alternative A are estimated for the first stabilized year of operation, assumed to be 2019, with an opening year of 2017. The direct output from the casino within the Counties is estimated at \$278.9 million, of which \$235.8 million is attributed to the

gaming and entertainment industry. Indirect and induced outputs within the Counties are estimated at \$69.2 million and \$67.0 million, respectively. Overall, it is projected that approximately \$415.1 million (in 2019 dollars) will be generated annually within the Counties once Alternative A becomes operational. **Table 4.7-3** details the estimated operational impact for the various alternatives.

**TABLE 4.7-3**  
ANNUAL OPERATIONAL ECONOMIC IMPACT (MILLIONS) –  
SACRAMENTO AND SAN JOAQUIN COUNTIES

	Alternatives					
	A	B	C	D	E	F
<b>Direct Output (Industry)</b>						
Entertainment & Recreation	\$235.8	\$189.8	\$0.0	\$202.5	\$163.4	\$244.5
Retail Trade	\$1.7	\$1.4	\$19.9-32.8	\$1.4	\$1.1	\$1.7
Accommodation & Food Services	\$41.4	\$30.6	\$3.7-6.1	\$37.1	\$26.5	\$42.0
<b>Direct Total</b>	<b>\$278.9</b>	<b>\$221.8</b>	<b>\$23.6-38.9</b>	<b>\$241.0</b>	<b>\$191.1</b>	<b>\$288.2</b>
<b>Other Output</b>						
Indirect	\$69.2	\$54.7	\$4.4-7.2	\$59.8	\$47.1	\$71.5
Induced	\$67.0	\$56.5	\$7.1-11.7	\$61.1	\$50.1	\$67.5
<b>Total Output</b>	<b>\$415.1</b>	<b>\$332.9</b>	<b>\$35.1-57.8</b>	<b>\$361.9</b>	<b>\$288.3</b>	<b>\$427.1</b>
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to exactly equal the number given in the Total. Source: <b>Appendix H</b> - Economic Impact Statement for Wilton Rancheria						

It should be noted that the operational economic impacts for Alternative A listed in **Table 4.7-3** account for substitution effects. In the absence of Alternative A, this substituted revenue would flow to other businesses in the area.

Expenditures on goods and services from the operation of Alternative A are also anticipated to have a significant effect within the city limits of Galt. Under Alternative A, total direct, indirect and induced output from the project's operations in the City of Galt are estimated at \$81.6 million, \$8.0 million and \$5.6 million, respectively (**Table 4.7-4**).

**TABLE 4.7-4**  
ANNUAL OPERATIONAL ECONOMIC IMPACT (MILLIONS) – CITY OF GALT

	Alternatives		
	A	B	C
Direct Output (Industry)	\$81.6	\$61.3	\$34.1-41.7
Indirect Output	\$8.0	\$6.0	\$5.6-6.9
Induced Output	\$5.6	\$4.7	\$2.1-2.6
<b>Total Output</b>	<b>\$95.2</b>	<b>\$72.1</b>	<b>\$41.7-51.2</b>
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to exactly equal the number given in the Total. Source: <b>Appendix H</b> - Economic Impact Statement for Wilton Rancheria.			

The figures above for the City of Galt were computed first by reversing the approximate 20 percent substitution effect that is assumed to occur within the two Counties. This is because there are no other gaming venues in the City of Galt. However, the resulting unadjusted output and wages estimated by the IMPLAN model for the City of Galt "study area" do not take into account the fact that Alternative A is a relatively large project in the context of the City of Galt, and therefore much of the output and employment will accrue to persons and businesses outside of Galt city limits. Consequently, a gravity model analysis was conducted to estimate the percentage of economic effects that would likely take place within Galt city limits by using a matrix of worker and customer drive times combined with the propensity for persons within these areas to seek to consume or seek employment within Galt city limits. Based on this analysis, it was determined that the proportion of employment and economic output that would occur within Galt city limits is approximately 20 percent and 33 percent, respectively (**Appendix N**). Note that the estimated employment under Alternative C (the retail alternative) is 25 percent (**Appendix H**). This accounts for the fact that the requisite skills sets for Alternative C job positions are less specialized and diverse in comparison to the casino alternatives. As a result, the job positions for Alternative C would tend to be filled by a slightly greater percent of City of Galt residents as compared to the job positions for the casino alternatives.

### ***Substitution Effects***

Potential substitution effects (the loss of customers at existing commercial businesses to the new business) of a Tribal casino on existing restaurant, recreation, and retail establishments have been considered when evaluating the magnitude of the casino's impact on the economy. The magnitude of the substitution effect can generally be expected to vary greatly by specific location and according to a number of variables. That is, how much of the casino's revenue comes at the expense of other business establishments in the area depends on how many and what type of other establishments are within the same market area as the casino, disposable income levels of local residents and their spending habits, as well as other economic and psychological factors affecting the consumption decisions of local residents.

### ***Existing Tribal Casino Gaming Market Substitution Effects***

An analysis of the potential substitution effects of Alternative A on other gaming facilities based on the gaming market and the distance, size, and quality of nearby facilities was conducted and is included as **Appendix U**. The analysis included collecting background information and developing a gaming market gravity model. The gravity model is based on an assessment of overall gaming revenues supported by population, incomes, typical win per visit and casino gaming participation both nationally and in California.

Whenever a new casino opens in a new market area, a certain amount of market substitution is to be expected. The various gaming alternatives are projected to cause an estimated year 1 (2019) decline in revenue of competing facilities, as shown below in **Table 4.7-5 (Appendix U)**.

**TABLE 4.7-5**  
ESTIMATED SUBSTITUTION EFFECTS

Revenue Source	Alternatives				
	A	B	D	E	F
Cache Creek	-5.3%	-3.2%	-2.3%	-0.9%	-4.0%
Thunder Valley	-4.9%	-3.4%	-5.0%	-4.2%	-8.1%
Enterprise Rancheria <sup>1</sup>	-4.5%	-3.1%	-3.9%	-3.3%	-7.2%
Red Hawk	-5.7%	-4.1%	-5.3%	-4.4%	-7.2%
Jackson Rancheria	-10.4%	-7.7%	-6.5%	-5.3%	-9.9%
Black Oak Casino	-5.8%	-3.9%	-2.3%	-1.2%	-3.5%
Graton Resort and Casino	-3.7%	-2.3%	-1.6%	-0.7%	-2.1%
San Pablo Lytton	-1.6%	-1.2%	-1.7%	-1.8%	-0.9%
River Rock	-2.7%	-1.4%	-1.0%	-0.3%	-1.4%
Colusa Casino	-4.6%	-3.0%	-3.0%	-2.2%	-5.3%
Feather Falls Casino/Gold Country	-4.7%	-3.2%	-3.6%	-3.0%	-6.3%
Rolling Hills Casino	-5.0%	-3.2%	-2.5%	-1.4%	-4.2%
North Fork Rancheria (Stations Madera) <sup>1</sup>	-10.9%	-8.9%	-7.1%	-6.1%	-8.1%

<sup>1</sup>Casino has been approved but not yet constructed.  
Source: **Appendix U** – Economic Background and Competitive Effects Study

**Table 4.7-5** includes the estimated competitive effects on two gaming venues that are not operational as of the date of this document. These are the Enterprise Rancheria and the North Fork Rancheria (also referred to as Stations Madera). These two gaming venues are included in this analysis because it is assumed that these venues will be operational by the time that the Wilton Rancheria casino described herein is operational. **Table 4.7-5** includes only competitive effects to the larger gaming venues, which are all tribal casinos, and to those venues that are anticipated to have a measurable competitive effect, which is defined a decline of over 1.0 percent in gaming revenue.

The composition of gaming revenues for each alternative in the first full year of operation is summarized below in **Table 4.7-6**. Most of the anticipated gaming revenue for each of the alternatives is anticipated to come from new market growth.

**TABLE 4.7-6**  
PROJECTED SUBSTITUTION EFFECTS SUMMARY – GAMING (MILLIONS)

Scenario	Projected Local Revenue	Substitution Effect	New Market Growth
Alternative A	\$365	(\$136)	\$229
Alternative B	\$294	(\$93)	\$201
Alternative D	\$280	(\$92)	\$188
Alternative E	\$228	(\$68)	\$160
Alternative F	\$366	(\$137)	\$229

Source: **Appendix U** – Economic Background and Competitive Effects Study  
Notes: 1) Alternative C does not have a gaming component; consequently, this analysis does not apply.  
2) All numbers are rounded to the nearest million dollar.

Estimated substitution effects are anticipated to diminish after the first year of the project's operation because local residents will have experienced the casino and will gradually return to more typical and more diverse spending patterns. Substitution effects also tend to diminish after the first full year of operations because, over time, growth in the total population and economic growth tend to increase the dollar value of demand for particular goods and services. The substitution effects resulting from Alternative A to competing gaming facility revenues are not anticipated to significantly impact these casinos, or to cause their closure, or to significantly impact the ability of the tribal governments that own the above listed facilities to provide essential services to their respective memberships.

#### *Licensed Cardroom Substitution Effects*

A study was performed to estimate competitive or substitution effects to licensed local area cardrooms. This study is located in the supplement to **Appendix H** provided in the Final EIS. This study concludes that Alternative A and Alternative F would result in a year 1 decline in licensed cardroom revenues of approximately 6 percent of cardroom revenues. Competitive effects to licensed cardrooms are less than effects to existing casinos because of the different clientele, gaming mix, and atmosphere of cardrooms versus casinos. Competitive effects would also tend to dissipate over time due to growth in the economy, and to changing consumer preferences.

The 6 percentage revenue decline under Alternatives A and F represent an average of the revenue declines of the cardrooms that are located in the competitive market area of Alternatives A and F. Consistent with the gravity model used in the preparation of **Appendix U** competitive effects to cardroom revenues would be strongest for those cardrooms that are closest to the Twin Cities site (Alternative A) and the Elk Grove Mall site (Alternative F). Specifically, those facilities located within a 45 minute drive time of the project sites would likely experience the greatest impact. For those card clubs located within this travel time radius, a substitution effect of as much as 20 percent could occur under Alternatives A and F (refer to the supplement to **Appendix H** provided in the Final EIS). The substitution effects would be slightly less under the other gaming alternatives because they are smaller in scope than Alternatives A and F. Because of the large number of cardrooms analyzed in the supplement to **Appendix H** provided in the Final EIS, and because minimal financial information is available on the individual cardrooms, an estimation of competitive effects to individual cardrooms was not undertaken.

Taken as a whole, competitive effects to licensed cardrooms would not be significant because a 6 percent decline in revenue is not sufficient to cause the closure of facilities, or to significantly impair the revenue received by cardroom owners. Competitive effects to individual cardrooms may or may not be substantial to specific cardroom owners, depending on the existing financial condition of such cardrooms. However, in the event that such competitive effects were to prove large to one or more specific cardrooms, this would not constitute a significant impact under NEPA. This is because the effects of competition are not environmental impacts per se, and because such effects would not have a significant impact on the physical environment. As recently upheld by the United States District Court for the Eastern District of California, "competition...is not sufficient, in and of itself, to conclude [there would be] a detrimental

impact ...” (*Citizens for a Better Way, et al. v. United States Department of the Interior*, E.D. Cal., 2015).

### ***Non-Gaming Substitution Effects***

A retail market study was conducted and is described in **Appendix U**. The study concluded that retail uses would be economically viable and would result in substantial annual lease revenue. This study is most applicable to Alternative C, the retail-focused development alternative.

Numerous studies have been conducted to estimate the substitution effects of gaming venues on existing retail business in the surrounding communities. The results of these studies are inconclusive, but collectively imply that newly introduced gaming venues do not typically have negative or adverse substitution effects on surrounding retail establishments. These studies include one published in 2008 by Barrow and Hirschy, which discussed the trends in Atlantic City (Barrow and Hirschy, 2008), and a 2008 study conducted by the Center for Policy Analysis of the University of Massachusetts Dartmouth (Center for Policy Analysis, 2013). These studies suggest that substitution effects are counteracted by increased activity at local retail businesses that are attributable to casino patrons other than local residents. This conclusion is substantiated by the dominance of the gaming component of Alternative A. The retail element of Alternative A exists only to complement the gaming component. The overwhelming majority of patrons who visit the site would be drawn there because of the gaming element, and therefore these persons would not otherwise patronize Galt retail establishments if not for the existence of Alternative A.

**Appendix U** also includes an analysis of projected hotel substitution effects. This analysis concludes that none of the alternatives, including Alternative A, would result in a substitution effect on existing hotels in the vicinity of the project sites. This is because the hotel component of each of the gaming project alternatives would be an integral part of the gaming venue. Consequently, the patrons to the hotel components of these alternatives would be the casino patrons, which is a distinct market segment from those patrons who stay at the existing non-gaming hotels in the vicinities of the project sites.

### ***Fiscal Effects***

Alternative A would result in a variety of fiscal impacts. The Tribe would not pay corporate income taxes on revenue or property taxes on tribal land. Alternative A would also increase demand for public services, resulting in increased costs for local governments to provide these services. Tax revenues would be generated for federal, state and local governments from activities including secondary economic activity generated by tribal gaming (i.e., the indirect and induced effects of the economic impact analysis). The taxes on secondary economic activity include: corporate profits tax, income tax, sales tax, excise tax, property tax, and personal non-taxes, such as motor vehicle licensing fees, fishing/hunting license fees, other fees, and fines. The net fiscal impacts before mitigation of Alternative A to local governments, including the two Counties and the City of Galt, would be the net result of the following changes in tax revenues and costs:

*One-time Items - Construction Related*

- Incremental taxes to the California state government and to governments in the Counties of approximately \$16.9 million related to construction activities (**Appendix H**). Approximately 60 percent of these revenues would be directly attributable to the construction of the project. The remaining 40 percent would be related to indirect and induced effects. The approximately \$16.9 million is comprised of approximately \$1,215,000 of employee taxes (payable to the state), \$4,914,000 in sales taxes (state and Counties), \$733,000 in use taxes (state and Counties) \$4,339,000 in property taxes (Counties), \$672,000 in corporate state income taxes, \$3,947,000 in personal state income taxes and \$1,033,000 in other taxes.
- Incremental taxes related to economic activities that occur in the City of Galt of approximately \$2.7 million (**Appendix H**). This amount is comprised of approximately \$247,000 of employee taxes (payable to the state), \$708,000 in sales taxes (state and Counties), \$106,000 in use taxes (state and Counties), \$625,000 in property taxes (Counties), \$27,000 in corporate state income taxes, \$793,000 in personal state income taxes, and \$192,000 in other taxes.
- Incremental costs related to the Counties' and the City of Galt's evaluation of Alternative A.
- Incremental costs, if any, related to construction inspection services provided by the Counties and/or the City of Galt.

*Annually Recurring Items - Operations Related*

- Incremental taxes to the California state government and governments in the Counties of approximately \$13.8 million related to operating activities (**Appendix H**). This amount is comprised of approximately \$1,150,000 of employee taxes (payable to the state), \$3,485,000 in sales taxes (state and Counties), \$520,000 in use taxes (state and Counties), \$3,075,000 in property taxes (Counties), \$1,416,000 in corporate state income taxes, \$3,212,000 in personal state income taxes, and \$966,000 in other taxes. Only the indirect and induced component of property, sales and use taxes are included in these figures because these types of taxes are not applicable to economic activities that occur on trust land. Specifically, property, sales and use taxes were estimated by multiplying the these respective taxes as calculated by the IMPLAN model (which does not take into account the tax exemption from activities on trust land) by the ratio of indirect and induced operational effects to total operational effects in the IMPLAN model. This ratio is approximately 25%.
- Incremental taxes related to economic activities that occur in the City of Galt of approximately \$2.5 million (**Appendix H**). This amount is comprised of approximately \$221,000 of employee taxes (payable to the state), \$607,000 in sales taxes (state and Counties), \$91,000 in use taxes (state and Counties), \$536,000 in property taxes (Counties), \$175,000 in corporate state income taxes, \$601,000 in personal state income taxes, and \$223,000 in other taxes. Only the indirect and induced component of property, sales and use taxes are included in these figures because these types of taxes are not applicable to economic activities that occur on trust land. Specifically, property, sales and use taxes were estimated by multiplying the these respective taxes as calculated by the IMPLAN model (which does not take into account the tax exemption

from activities on trust land) by the ratio of indirect and induced operational effects to total operational effects in the IMPLAN model, This ratio is approximately 25%.

- Lost property tax revenues of approximately \$31,000 payable to Sacramento County that would result from taking the Twin City parcels into trust.
- Incremental costs related to the Counties' and the City of Galt's evaluation of Alternative A.
- Incremental costs related to the provision of local law enforcement services that would likely be required to address the anticipated criminal incidents associated with the development project.
- Incremental costs related to the provision of fire and safety services that would likely be required to address the anticipated fire and medical incidents associated with the development project.
- Incremental costs associated with the provision of roadway, utilities and other infrastructure needs associated with the development project.

These various categories of state and local taxes are allocated to state, county, and local governments, in approximately the following proportions:

*Sales Taxes*

The estimated \$5.8 million in sales and other taxes on construction materials would occur at the point of sale from which those materials were shipped. For example, for materials sold within the city limits of Galt, the sales tax rate as of July 1, 2015 was 8.50 percent. The 2015 sales tax rate for materials sold at the Twin Cities site was 8.00 percent. The allocation of revenues for sales taxes originating from the Twin Cities site would be the following during fiscal year 2015 (BOE, 2015; STA, 2004):

	Jurisdiction			
	State	Counties	City of Galt	Total
State General Fund	3.9375%			3.9375%
Local Public Safety Fund	0.5000%			0.5000%
State Education Protection Account to support school districts, county offices of education and other school activities	0.2500%			0.2500%
Local Revenue Fund to support local health and social service programs	0.5000%			0.5000%
Local Revenue Fund 2011	1.0625%			1.0625%
Local transportation fund (Sacramento County)		0.2500%		0.2500%
City or County operations <sup>(1)</sup>		1.0000%		1.0000%
Measure A funding for transportation (Sacramento Transportation Authority <sup>(2)</sup> )		0.5000%		0.5000%
<b>Total</b>	<b>6.2500%</b>	<b>1.7500%</b>	<b>0.0000%</b>	<b>8.0000%</b>
With the exception of the 0.500% funding for Measure A, all amounts are per the California State Board of Equalization, at <a href="http://www.boe.ca.gov/news/sp111500att.htm">http://www.boe.ca.gov/news/sp111500att.htm</a> . 1. Pursuant to Section 7203.1 of the Uniform Local Sales and Use Tax Law, this amount would be remitted to a city if the site was within a city's limits. 2. Source: California State Board of Equalization publication BOE-95 REV. 6 (7-15), at <a href="http://www.boe.ca.gov/pdf/boe95.pdf">http://www.boe.ca.gov/pdf/boe95.pdf</a> .				

*State Income Taxes*

The estimated personal and corporate taxes would be paid directly to the state of California.

*Property Taxes*

Property taxes are remitted to the Counties. Each California county and city assesses its own property taxes that include the 1.00 percent of assessed value base rate, plus other fees and taxes approved by popular vote and other mechanisms. Within unincorporated Sacramento County, that 1.00 percent of assessed value is remitted to Sacramento County, which in turn allocates the funds to the Uses shown in **Table 4.7-7**. In addition, there are additional taxes and fees allocable to most parcels located in Sacramento, and these vary, depending upon ballot measures and other mechanisms that are exempt from the 1.00 percent limit. These uses of funds are shown below in **Table 4.7-7** for the parcels that comprise the Twin Cities site.

**TABLE 4.7-7**  
ANNUAL USES OF PROPERTY TAX FUNDS PER \$100,000 OF ASSESSED VALUE FOR PARCELS THAT COMPRISE TWIN CITIES SITE

<b>Uses of Property Tax Funds</b>	<b>Amount</b>
Schools	\$497.30
County General	\$164.70
Fire Protection Districts	\$101.10
Cities	\$107.40
Redevelopment	\$56.70
Special Districts	\$30.80
Community Service Districts	\$24.80
Recreation and Park Districts	\$17.20
<b>Total Countywide General Tax</b>	<b>\$1,000.00</b>
Galt Joint Union Elementary School General Obligation Bond	\$26.30
Galt Joint Union High School General Obligation Bond	\$44.50
San Joaquin Delta General Obligation Bond	\$23.30
<b>Total of Other Taxes and Fees<sup>1</sup></b>	<b>\$94.10</b>
Source: BOE, 2015; STA, 2004	
1. These specific taxes and amounts, exclusive of the countywide tax, are applicable only to the parcels that comprise the Twin Cities site. The total amount of other taxes and fees for the Historic Rancheria and Mall sites are slightly different.	

The supplement to **Appendix H** provided in the Final EIS includes tables that disaggregate estimated tax revenues to the State of California, County, and city level. Based on these disaggregation analyses, it should be noted that the majority of taxes at the state and local level accrue to the State of California and the two Counties.

As described in **Section 2.2.2**, Alternative A would include transfer of seven parcels from fee status into federal trust for the benefit of the Tribe, resulting in the loss of local property taxes. As shown in **Table**

3.7-7, during the 2013-2014 fiscal year, the Twin Cities site generated \$30,964 of property tax income for state, county, and local governments. Because property in trust is not subject to property taxes, these property taxes would be lost to state and local governments. Such lost property taxes would be more than offset by tax revenues generated for state and local governments from economic activity associated with construction and operation of Alternative A. These estimated tax revenues are summarized in **Table 4.7-8** and **Table 4.7-9**. Construction of Alternative A would generate an estimated one-time \$30.1 million in federal tax revenues, and \$16.9 million in state/county/local tax revenues. Operation of Alternative A would generate an estimated \$31.3 million annually in federal tax revenues, and \$13.8 million in state/county/local tax revenues from indirect and induced taxes.

**TABLE 4.7-8**  
ESTIMATED NEW TAX REVENUES (MILLIONS) – SACRAMENTO AND JOAQUIN COUNTIES

	Alternatives					
	A	B	C	D	E	F
<b>Construction (One Time)</b>						
Federal	\$30.1	\$18.3	\$26.5	\$30.8	\$19.0	\$27.6
State/County/Local	\$16.9	\$10.3	\$14.9	\$17.3	\$10.7	\$15.5
<b>Operation (Annually)</b>						
Federal	\$31.3	\$26.0	\$5.3-6.6	\$28.2	\$22.9	\$31.7
State/County/Local	\$13.8	\$11.4	\$2.5-3.6	\$12.4	\$10.0	\$14.0
Lost Property Taxes	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	-\$0.2
State/County/Local, Net	\$13.8	\$11.4	\$2.5-3.6	\$12.4	\$10.0	\$13.8
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to equal the exact number given in the Total. The operational tax revenues indicated in the table include indirect and induced taxes only. Due to the project's unique circumstances, including the proposed location on trust land, direct tax revenues were not quantifiable. As such, actual tax revenues generated by the project may be greater than those indicated above as direct personal income tax has not been included in the totals. Source: <b>Appendix H – Economic Impact Statement for Wilton Rancheria, except for lost property taxes (Section 3.7)</b>						

**TABLE 4.7-9**  
ESTIMATED NEW TAX REVENUES (MILLIONS) – STATE, COUNTY AND LOCAL TAXES ONLY  
THAT WOULD OCCUR WITHIN THE CITY OF GALT

	Alternatives		
	A	B	C
Construction (One Time)	\$2.7	\$1.6	\$2.4
Operation (Annually)	\$2.5	\$2.0	\$3.9-4.6
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to equal the exact number given in the Total. The operational tax revenues indicated in the table include indirect and induced taxes only. Due to the project's unique circumstances, including the proposed location on trust land, direct tax revenues were not quantifiable. As such, actual tax revenues generated by the project may be greater than those indicated above as direct personal income tax has not been included in the totals. Source: <b>Appendix H – Economic Impact Statement for Wilton Rancheria.</b>			

There are property taxes, sales taxes and hotel taxes that would result if the various project alternatives analyzed herein were constructed on fee land. These include:

- Property taxes in the amount of approximately 1.094 percent of assessed value.
- Sales taxes on retail and food sales of approximately 8.0 percent of retail sales. Note that, to the extent that the retail arrangements under the various alternatives are structured as leases from the Tribe to concessionaires, such concessionaires may be required to pay such sales taxes.
- Hotel/motel tax equal to 12.0 percent of net hotel room revenue.

However, none of the alternatives analyzed herein would be constructed on fee land. Consequently, potential property taxes resulting from development of the alternatives on fee land, or the absence thereof, are not impacts under NEPA. Rather, impacts are defined as the difference between the consequences of development of each alternative in comparison to the baseline described in Section 3, which is what is in existence as of today. The requirement under NEPA is to estimate impacts that are reasonably foreseeable. As discussed in **Section 2.8**, developments of the sites analyzed herein are not reasonably foreseeable in the short-term. Development of the sites may occur consistent with zoning designations in the long-term. However, specific development plans for the long-term are not known or available. Revenues for the various project alternatives are described in **Appendix H** and **Appendix U**. It should be noted that the revenues of the alternatives described herein are not a proxy for future revenues that would likely accrue if the alternatives described herein do not occur. Rather, in the event that none of the alternatives described herein were to occur, the timing, type and scale of development that would likely occur on the various sites would likely be very different from the alternatives described herein. Because the project alternatives were, in part, developed based on the suitability of specific sites for gaming and retail projects undertaken specifically by the Tribe, other future uses for these sites by parties other than the Tribe would not likely resemble the project alternatives analyzed herein.

It also be noted that the anticipated impacts to law enforcement, fire protection, and emergency medical services are separately analyzed in **Section 4.10.1**. The majority of funding for these services is currently provided by property tax revenues. Mitigation measures related thereto are described in **Section 5.10**. Consequently, it should be noted that costs associated with the provision of these services is addressed in **Section 4.10**.

In summary, in the absence of mitigation, the net fiscal impact on the Counties and the City of Galt are neutral to negative on balance. Although the project will provide increased taxes, some of which will flow to the Counties and the City of Galt, Alternative A will also result in an increase use of public services, increased uses of local roadways and infrastructure, and higher utility usage. The 2016 Memorandum of Understanding (2016 MOU) provides for payments from the Tribe to Sacramento County to address fiscal effects (**Appendix B**). The net increase in tax revenues, in combination with the implementation of the mitigation measures outlined in **Section 5.7 and 5.10**, would adequately fund the

increase in demand for public services in relevant jurisdictions. Consequently, the various alternatives, including Alternative A, would not result in adverse socioeconomic effects.

### ***Property Values***

The construction of a casino resort may result in changes to local property values, which could impact local tax assessor rolls and in turn, local property tax revenues. Changes in appreciation rates of adjacent properties could also impact future property tax revenues. Changes in property value can be affected by a number of factors, including the proximity of the casino to other properties in the vicinity, the mix of properties surrounding the casino, whether the casino stimulates additional development and whether or not the casino is located in an urban area. Impacts to surrounding commercial and industrial uses would probably be neutral to positive because a casino development would bring increased economic activity and because such a project may stimulate additional commercial development in the vicinity of the site. Alternative A is located north of the City of Galt in an area currently of primarily agricultural uses, with some industrial and residential properties, however the site is slated for future commercial development. The impact of Alternative A on surrounding property values depends on this mix of land uses, plus future new land uses that would occur in the vicinity.

There have been numerous studies that seek to ascertain the impact that casino development has on surrounding property values. One useful analysis of this subject was a 2013 meta-analysis performed by the National Association of Realtors (NAR) Research Group, referred to as the “NAR Report” (NAR, 2013). The section of the NAR Report titled “The Impact of a Casino on Home prices in the Vicinity of the Casino is Generally Negative” examined eight previous studies on the topic of housing prices. The results of the eight studies cited in the NAR Report rendered the following conclusions regarding the existence of a potentially causal effect between casino construction and housing prices:

- Terrence M. Claurette et. al. (1998) regarding Henderson, Nevada: Negative effect
- Phineas Baxandall and Bruce Sacerdote (2005) regarding Indian casinos nationwide: Inconclusive
- James R. Landers (2004) regarding Indiana Riverboat casinos: Negative effect
- Michael Wenz (2007) regarding casinos nationwide: Positive effect
- Fred Carstensen et.al. (2000) regarding Foxwoods Resort Casino (located in Connecticut): Positive effect, although the NAR Report suggests that recent events have likely reversed the positive effects cited in this study
- Chadwick P. Jeffery (1996) regarding Windsor, Ontario: Inconclusive
- Christopher Alan Miller (2009) regarding Las Vegas, Nevada: Positive effect
- Jonathan A. Wiley and Douglas M. Walker (2009) regarding retail property in Detroit, Michigan: Positive effect

The NAR Report concludes that the effect of casino development in the Springfield, Massachusetts area would likely have a negative effect on local housing prices. This conclusion was rendered in contrast to

the viewpoint of the studies that are cited by the NAR Report, which collectively suggest an inconclusive correlation or a slightly positive effect. This difference in conclusions is partially due to the difference in specific attributes of the Springfield area, which has a higher population density than the nation taken as a whole. Analyzed collectively, the results of the NAR Report and the studies it cites show an inconclusive link between casino development and property values. Most of the studies cited in the NAR Report state that the impact of casinos on surrounding property values is dependent upon the particular mix of neighboring properties and economic conditions that occur at each specific site. For example, Wenz's study asserts that if the casino is located in a rural or relatively non-dense suburban area, then a new casino will draw patrons from outside the immediate area, and the economic activity associated with these patrons expending funds will indirectly increase property values (NAR, 2013). Similarly, Miller's work shows casino developments in destination resort areas (e.g., Las Vegas) tend to improve local economic conditions and thus property values (NAR, 2013). Conversely, Baxandall and Sacerdote's research indicates new casino developments located in economically vibrant urban areas that are not destination resorts, can have a negative impact on property values (NAR, 2013). Also, new casinos in regions with significant existing casino competition can derive a significant portion of their revenues from existing competitors, which can therefore lessen the positive economic effects that can accrue to the local economy (NAR, 2013).

Most of the studies cited in the NAR Report focus specifically on the effect of casino development on housing prices. The specific impact of Alternative A on the prices of local single family residences was estimated by comparing historical changes in housing values in nearby counties with casino developments with counties with little or no casino development. The specific list of counties analyzed was selected based on those counties that include the local gaming market (i.e., San Joaquin County and Sacramento County) of the various alternatives analyzed herein, plus those counties that are contiguous to San Joaquin County and Sacramento County. This technique of county selection was chosen so that the particular group of counties would have certain attributes in common. This list of counties was then stratified into two groups, with the first group comprised of those counties with significant gaming venues, and the second group comprised of counties with no significant gaming venues. The list of significant gaming venues was obtained from **Appendix U**. The results are summarized in **Table 4.7-10** below.

Based on the data, there does not appear to be significant differences between housing price appreciation in the counties with significant gaming venues as compared to the counties with no existing gaming venues. However, this data is not conclusive because of the possible existence of idiosyncratic differences between the counties that may cause larger effects on housing price appreciation than the existence, or lack thereof, of a gaming venue. Also the impact of the gaming venues on property values is probably largest in the immediate vicinity of each venue, yet could be diluted in the context of the countywide data illustrated above. Nevertheless, the data listed in **Table 4.7-10** and the inconclusive nature of studies described above, provide no evidence that Alternative A would negatively impact local and regional property values. Consequently it is reasonable to conclude that the development of Alternative A would have a less than significant impact on surrounding property values. This conclusion

is further supported by the mix of existing properties in the vicinity of the Alternative A site, which is comprised mostly of agricultural, commercial and industrial uses.

**TABLE 4.7-10**  
**MEDIAN PRICES OF EXISTING DETACHED HOMES BY COUNTY**

County	Venue	Date Opened <sup>1</sup>	Median, 1999 <sup>2</sup>	Median, 2004 <sup>2</sup>	Median, 2014 <sup>2</sup>	1999 – 2014 CAGR	2004 – 2014 CAGR
<b>Counties with significant gaming venues:</b>							
Amador	Jackson Rancheria	2003	NA	\$279,211	\$223,473	NA	-2.2%
Contra Costa	Lytton	2005	\$375,998	\$650,814	\$715,721	4.4%	1.0%
El Dorado	Red Hawk	2008	NA	NA	\$368,663	NA	NA
Placer	Thunder Valley	2003	\$195,018	\$408,089	\$377,603	4.5%	-0.8%
Yolo	Cache Creek	2004	NA	NA	\$344,590	NA	NA
Median						4.5%	-0.8%
<b>Counties with no significant gaming venues:</b>							
Alameda	None	NA	\$290,969	\$572,426	\$695,078	6.0%	2.0%
Calaveras	None	NA	NA	NA	NA	NA	NA
Sacramento	None	NA	\$130,743	\$313,993	\$267,598	4.9%	-1.6%
San Joaquin	None	NA	\$135,254	\$303,011	\$254,292	4.3%	-1.7%
Solano	None	NA	\$159,168	\$378,507	\$318,762	4.7%	-1.7%
Stanislaus	None	NA	\$118,569	\$257,917	\$223,790	4.3%	-1.4%
Sutter	None	NA	NA	NA	NA	NA	NA
Median						4.7%	-1.6%
Notes: 1. Opening dated defined as the commencement of the earlier of Class II or Class III gaming. 2. Prices for the entire year were calculated from the average of the monthly data for each of the 12 months that comprise each calendar year listed in the table. Source: California Association of Realtors, 2015.							

**Summary of Economic Effects**

Construction and operation of Alternative A would generate substantial economic output for a variety of businesses in the two-county region. Additionally, Alternative A would generate substantial tax revenues for state, county, and local governments. Potential effects due to the loss of state and federal tax revenues resulting from the operation as a sovereign nation on trust land would be offset by increased local, state and federal tax revenues resulting from construction and operation of Alternative A. Overall, Alternative A, in combination with the implementation of the mitigation measures specified in **Sections 5.7** and **5.10**, would result in a beneficial impact to the local economy in the two-county region.

**Employment**

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages. The source of direct, indirect, and induced employment opportunities and wages would be similar to those

industries for economic output, as discussed above in **Tables 4.7-1** and **4.7-3**. The Impact Analysis for Planning (IMPLAN) model was used to estimate employment positions generated by Alternative A, as described in **Appendix H**.

**Construction**

For full build-out under Alternative A, investment in construction activities would generate a one-time total of approximately 2,751 employment positions within the two-county region (**Table 4.7-11, Appendix H**) and approximately 506 employment positions within Galt city limits (**Table 4.7-12; Appendix H**). The number of employment positions is equivalent to the estimated number of person-years available to wage earners. A person-year is defined as the amount of labor one full-time employee can complete in a calendar year. For example, two half-time employees working for a year would constitute one person-year.

**TABLE 4.7-11**  
ONE-TIME CONSTRUCTION EMPLOYMENT AND WAGE IMPACTS –  
SACRAMENTO AND SAN JOAQUIN COUNTIES

	Alternatives					
	A	B	C	D	E	F
<b>Employment (Person-Years)</b>						
<i>Direct (Industry)</i>						
Construction	1,619	984	1,417	1,659	1,024	1,482
Manufacturing	26	6	26	25	6	26
Wholesale Trade	5	4	5	4	4	5
Scientific/Technical Services	45	45	45	44	45	45
<b>Direct Total</b>	<b>1,695</b>	<b>1,039</b>	<b>1,493</b>	<b>1,733</b>	<b>1,078</b>	<b>1,558</b>
<i>Other</i>						
Indirect	467	282	412	478	293	429
Induced	589	360	518	603	374	541
<b>Total Jobs</b>	<b>2,751</b>	<b>1,681</b>	<b>2,423</b>	<b>2,815</b>	<b>1,745</b>	<b>2,528</b>
<b>Wages (Millions)</b>						
<i>Direct (Industry)</i>						
Construction	\$110.0	\$66.8	\$96.2	\$112.7	\$69.5	\$100.6
Manufacturing	\$1.0	\$0.2	\$1.0	\$1.0	\$0.2	\$1.0
Wholesale Trade	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3
Scientific/Technical Services	\$2.4	\$2.4	\$2.4	\$2.4	\$2.4	\$2.4
<b>Direct Total</b>	<b>\$113.7</b>	<b>\$69.7</b>	<b>\$100.0</b>	<b>\$116.4</b>	<b>\$72.4</b>	<b>\$104.4</b>
<i>Other</i>						
Indirect	\$29.1	\$17.6	\$25.6	\$29.8	\$18.3	\$26.7
Induced	\$27.6	\$16.9	\$24.3	\$28.3	\$17.5	\$25.4
<b>Total Wages</b>	<b>\$170.4</b>	<b>\$104.2</b>	<b>\$149.9</b>	<b>\$174.5</b>	<b>\$108.2</b>	<b>\$156.5</b>
Note: Though numbers appear to be estimated to the nearest dollar and/or whole number, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to exactly equal the number given in the Total.						
Source: <b>Appendix H</b> – Economic Impact Statement for Wilton Rancheria.						

**TABLE 4.12**  
ONE-TIME CONSTRUCTION EMPLOYMENT AND WAGE IMPACTS, CITY OF GALT

	Alternatives		
	A	B	C
<b>Employment (Person-Years)</b>			
Direct Output (Industry)	431	262	378
Indirect Output	30	18	26
Induced Output	45	27	39
<b>Total Jobs</b>	<b>506</b>	<b>308</b>	<b>443</b>
<b>Wages (Millions)</b>			
Direct	\$26.4	\$16.1	\$23.1
Indirect	\$1.9	\$1.2	\$1.7
Induced	\$1.8	\$1.1	\$1.6
<b>Total Wages</b>	<b>\$30.2</b>	<b>\$18.3</b>	<b>\$26.4</b>
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to exactly equal the number given in the Total. Source: <b>Appendix H</b> - Economic Impact Statement for Wilton Rancheria.			

Employment opportunities generated from construction and operation of Alternative A would result in wage generation. Wage totals include hourly and salary payments as well as benefits including health and life insurance and retirement payments. Under Alternative A, investment in construction activities would generate one-time total wages of approximately \$170.4 million within the Counties (**Table 4.7-11, Appendix H**). Direct wages within the Counties are estimated to total approximately \$113.7 million, of which approximately \$110.0 million would be attributed to the construction industry. Because Alternative A is located in Sacramento County, and because Sacramento County is larger than San Joaquin County in terms of populations and economic activity, Alternative A will have a disproportional impact on Sacramento County. Specifically, due to drive time to the project site, it is estimated that approximately 80 percent of the construction and operational jobs and wages described above will accrue to employees who reside in Sacramento County, and approximately 20 percent will accrue to employees who live in San Joaquin County (**Appendix H**). These same percentages apply to the allocation of effects for Alternatives B and C because these alternatives are also located at the Twin Cities site.

Under Alternative A, investment in construction activities would also generate one-time total wages of approximately \$30.2 million within Galt city limits. (**Table 4.7-12, Appendix H**). Direct wages within Galt city limits are estimated to total approximately \$26.4 million, the majority of which would be attributed to the construction industry. The generation of employment and wages during construction is considered a beneficial effect of Alternative A. **Table 4.7-11** and **Table 4.7-12** summarizes the estimated construction-related employment and wage impacts of each alternative.

**Operation**

Employment opportunities generated from the operation of Alternative A would include entry-level, mid-level, and management positions. Examples of employment opportunities typically offered by tribal casino and resort facilities are listed in **Table 4.7-13**. Average salaries offered would be consistent with those of other tribal gaming facilities and competitive in the local labor market.

**TABLE 4.7-13**  
TYPICAL TRIBAL CASINO EMPLOYMENT OPPORTUNITIES

Casino slot operations	Hotel management	Food & beverage operations	Financial services
Table games	Hotel facilities	Restaurant services	Support services
Entertainment operations	Hotel marketing	Culinary services	Security services
Casino credit	Housekeeping services	Human resources	Surveillance
Casino administration	Hotel administration	Casino services	Hotel services
Source: Boyd Gaming, 2014.			

As calculated through IMPLAN, operational activities associated with Alternative A would generate an annual total of approximately 2,879 employment opportunities to be captured within the Counties (**Table 4.7-14; Appendix H**). Direct employment impacts were estimated to total approximately 2,014 job opportunities (**Table 4.7-14; Appendix H**). Indirect and induced employment opportunities were estimated to total 428 and 437, respectively, and would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region (**Appendix H**).

Operation activities associated with Alternative A would generate annual total wages of approximately \$141.59 million within the Counties (**Table 4.7-14, Appendix H**). Direct wages within the Counties are estimated to total approximately \$92.7 million, of which approximately \$67.91 million would be attributed to the gaming and entertainment industry. Indirect and induced wages are estimated to total \$26.0 million and \$22.7 million, respectively, and would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region (**Appendix H**). Operational activities associated with Alternative A would generate annual total wages of approximately \$23.6 million within Galt city limits (**Table 4.7-15, Appendix H**). Direct wages within Galt city limits are estimated to total approximately \$19.1 million, the majority of which would be attributed to the gaming and entertainment industry. Indirect and induces wages are estimated to total approximately \$3.1 million and \$1.4 million, respectively within Galt city limits. The generation of employment and wages during the operation phase is considered a beneficial effect of Alternative A.

For the purposes of this analysis, it is assumed that the unemployment rate for Sacramento County will decline in a fashion similar to anticipated national trends. As of December 2013, Sacramento County experienced an unemployment rate of 7.6 percent, and the size of the labor force was estimated at 680,000 people (**Appendix H**). This implies that approximately 52,000 people were unemployed as of December 2013. Similarly, the unemployment rate in 2019 is anticipated to decline significantly, although the extent of the decline varies by estimate, and most estimates are not specific to Sacramento County.

Nevertheless, assuming a 2.0 percent decline in the unemployment rate to 5.6 percent and a 1.2 percent growth in population (**Appendix N**) and thus a 2019 labor force of 730,000, it can be estimated that approximately 41,000 Sacramento County residents would be unemployed in 2019. In addition, many of the Alternative A employment positions would be filled by employees who reside in San Joaquin County (approximately 20 percent, **Appendix H**). Consequently, there are anticipated to be more than enough people available to fill the total 2,879 employment positions generated by the operation of Alternative A.

**TABLE 4.7-14**  
ANNUAL OPERATIONAL EMPLOYMENT AND WAGE IMPACTS –  
SACRAMENTO AND SAN JOAQUIN COUNTIES

	Alternative					
	A	B	C	D	E	F
<b>Employment (Person-Years)</b>						
<i>Direct (Industry)</i>						
Entertainment and Recreation	1,261	1,176	0	1,152	1,035	1,257
Retail Trade	50	40	481–565	39	32	48
Accommodation and Food Services	703	458	106–126	679	410	726
<b>Direct Total</b>	<b>2,014</b>	<b>1,674</b>	<b>588–691</b>	<b>1,870</b>	<b>1,477</b>	<b>2,031</b>
<i>Other</i>						
Indirect	428	338	26–43	370	291	442
Induced	437	369	93–110	399	327	440
<b>Total Jobs</b>	<b>2,879</b>	<b>2,380</b>	<b>707–844</b>	<b>2,639</b>	<b>2,095</b>	<b>2,914</b>
<b>Wages (Millions)</b>						
<i>Direct (Industry)</i>						
Entertainment and Recreation	\$67.9	\$61.7	\$0.0	\$62.6	\$55.5	\$67.7
Retail Trade	\$1.4	\$1.1	\$19.6–23.0	\$1.1	\$0.9	\$1.4
Accommodation and Food Services	\$23.4	\$16.7	\$2.7–3.2	\$22.1	\$14.7	\$23.6
<b>Direct Total</b>	<b>\$92.7</b>	<b>\$79.6</b>	<b>\$22.3–26.2</b>	<b>\$85.7</b>	<b>\$71.0</b>	<b>\$92.7</b>
<i>Other</i>						
Indirect	\$26.0	\$20.6	\$1.5–2.4	\$22.5	\$17.7	\$26.9
Induced	\$22.7	\$19.2	\$4.8–5.7	\$20.7	\$17.0	\$22.9
<b>Total Wages</b>	<b>\$141.5</b>	<b>\$119.3</b>	<b>\$28.6–34.3</b>	<b>\$129.1</b>	<b>\$105.7</b>	<b>\$142.5</b>
Note: Though numbers appear to be estimated to the nearest dollar and/or whole number, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to equal the exact number given in the Total.						
Source: <b>Appendix H</b> – Economic Impact Statement for Wilton Rancheria						

As described previously under Economic Effects, Alternative A would not result in significant substitution effects that would impact non-gaming businesses in the vicinity of the project site. Consequently, the operation of Alternative A would likely result in the creation of slightly less than 2,879 employment positions, after netting out any job losses due to non-gaming substitution effects.

**TABLE 4.7-15**  
ANNUAL OPERATIONAL EMPLOYMENT AND WAGE IMPACTS FOR THE CITY OF GALT

	Alternatives		
	A	B	C
<b>Employment (Person-Years)</b>			
Direct Output (Industry)	403	335	230 - 288
Indirect Output	53	40	34 - 42
Induced Output	32	27	13 - 17
Total Jobs	488	402	278 - 348
<b>Wages (Millions)</b>			
Direct	\$19.1	\$16.3	\$8.8 - 11.1
Indirect	\$3.1	\$2.3	\$2.0 - 2.5
Induced	\$1.4	\$1.2	\$0.6 - 0.8
Total Wages	\$23.6	\$19.8	\$11.4 - 14.3
Note: Though numbers appear to be estimated to the nearest dollar, accuracy is not indicated to that level due to rounding. Due to rounding, numbers may not add up to exactly equal the number given in the Total. Source: <b>Appendix H</b> - Economic Impact Statement for Wilton Rancheria.			

### **Summary of Employment Effects**

Construction and operation of Alternative A would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in the two-county region. Given the projected unemployment rate, and the dynamics of the local labor market, the Counties are anticipated to be able to accommodate the increased demand for labor during the operation of Alternative A. This would result in employment and wages for persons previously unemployed and would contribute to the alleviation of poverty among lower income households. Specifically, assuming that approximately 80% of the new 2,879 employment positions would accrue to Sacramento County residents (assumed based on drive time to the project site, **Appendix H**), and assuming all other factors remain unchanged, this implies that Sacramento County unemployment would decline from the approximate 41,000 persons in 2019 described above to approximately 38,700 persons. This equates to a decline in the Sacramento County unemployment rate from 5.6 percent to 5.3 percent. The decline in the unemployment rate in San Joaquin County should be similar, albeit slightly smaller due to the fact that the project site is located in Sacramento County. While employment opportunities at existing gaming facilities may temporarily be reduced proportional to the estimated substitution effect described previously, the net impact to employment opportunities as a result of the Alternative A would be positive. This is considered a beneficial effect.

### **Housing**

Based on the information presented in **Section 3.7.2**, the 2010 Sacramento County housing market was comprised of approximately 556,000 total units, of which approximately 7.6 percent (42,000 units) were vacant (**Table 3.7-3**). Approximately 30,800 of these units were vacant within a 25-mile radius of the

Twin Cities site, which represents the upper bound of a feasible commuting distance to the Twin Cities site (**Table 3.7-3**). Under a more conservative commuting radius of 15 miles, the housing stock in the cities of Elk Grove, Galt and Lodi would be included. When combined with the housing stock within unincorporated Sacramento County, this yields approximately 8,000 vacant residential units as of 2010 (**Table 3.7-3**). Although estimates vary, it is anticipated that the number of vacant units will decline in Sacramento County between 2010 and 2019, which is anticipated to be the first full year of operations. However, a reasonable estimate of 2019 vacant units would be more than sufficient to accommodate any employees that might relocate to the area to accept a position at the casino-resort. It should also be noted that many project employees will reside in San Joaquin County, which, similar to Sacramento County, has a significant housing stock and housing availability in a variety of price ranges. Also, new housing stock, such as the developments described in **Section 4.15**, will continue to come on line prior to the first full year of operations of Alternative A. As noted in the *Employment* discussion above, there are anticipated to be more than enough residents of the Counties available for work to accommodate all 2,879 employment opportunities created by the project. Therefore, it is not anticipated that many employees of the project would require relocation in order to accept a position. However, if employees were to relocate to the area to accept a position, the number of projected vacant housing units within either a 25-mile or 15-mile commuting distance would be more than enough to accommodate all employees.

As discussed above, based on regional housing stock projections and current trends in area housing market data, there are anticipated to be more than enough vacant homes to support potential impacts to the regional labor market under Alternative A. Therefore, Alternative A would not significantly stimulate regional housing development—i.e., no new housing would be required to be constructed to accommodate employees of Alternative A. See *Property Values* analysis above which concludes that any increase in housing demand attributable to Alternative A is not large enough to cause a significant impact on property values. Alternative A would not cause a significant adverse impact to the housing market. Potential indirect effects resulting from growth inducement are discussed further in **Section 4.14**.

## **Social Effects**

### *Problem and Pathological Gambling*

The American Psychiatric Association (APA) describes pathological gambling as an impulse control disorder with ten diagnostic criteria, including preoccupation, tolerance, withdrawal, escape, chasing, lying, loss of control, illegal acts, risk of significant relationship, and financial bailout. At-risk gaming behaviors typically meet one or two of these criteria; problem gamblers typically meet three to four of these criteria; and pathological gamblers typically meet at least five of these criteria (**Appendix N**).

Pathological gambling often occurs in conjunction with other behavioral problems, including substance abuse, mood disorders, and personality disorders. Even if it were possible to isolate the effects of problem gambling on people who suffer from co-morbidity, it is difficult to then isolate the effects of casino gambling from other forms of gambling. As discussed, casino gambling is only one form of

gaming. In fact, the most prevalent forms of gambling are those found in most neighborhoods: scratch lottery cards, lotto, and video lottery terminals. Thus, problem gamblers are likely to already exist in most communities (**Appendix N**).

Social costs from problem gambling may include suicide, divorce, and bankruptcy. The report in **Appendix N** reviewed numerous relevant studies on the subject of problem gambling, with a particular emphasis on:

- National Gambling Impact Study Commission (“NGISC”) Report to the US Congress and the President
- Impact of Gambling: Economic Effects More Measurable than Social Effects, prepared by the General Accounting Office
- Economic and Social Impact of Introducing Casino Gaming, prepared by the Federal Reserve Bank of Philadelphia

These reports estimate that the proportion of problem gamblers in the U.S. comprises approximately 1.2 to 1.6 percent of the adult population. Collectively, these studies indicate that there can be substantial social and economic costs associated with problem gambling, including health problems, suicide, divorce and crime. However, these studies also indicate that it is difficult to uncouple to what extent these issues arise from problem or pathological gambling, versus other issues associated with these individuals. Consequently, it is difficult to establish the extent of the costs associated with problem gamblers are due to a causal relationship versus a correlation that is not causal.

Notwithstanding the difficulty in estimating the social and other costs associated with problem gambling, there would be no anticipated significant increase to problem gambling rates in the local area because of the relatively large number of existing casinos in the greater Sacramento area (**Appendix N**).

Consequently, the potential impacts to problem gambling as a result of Alternative A would be less than significant. Nevertheless, the 2016 MOU provides for payments from the Tribe to Sacramento County to fund measures to mitigate impacts, including problem gambling (**Appendix B**). Mitigation in **Section 5.7** provides that the Tribe and local governments enter into an agreement that addresses efforts to treat problem gamblers. The Tribe may also enter into a Tribal-State Compact that would govern the conduct of Class III gaming activities at the chosen project site. Such a Tribal-State Compact would likely include the payment of funds that would be used by the State for a number of purposes, including mitigation for problem gambling, as described in **Section 5.7**. Thus, the less than significant impacts from problem gambling would be further mitigated through the measures described in **Section 5.7**.

### *Crime*

There is a commonly held belief that the introduction of legalized gambling in a community will increase crime within that community because of the belief that gambling may attract unsavory businesses and because problem or pathological gamblers may commit crime in order to fund their habit. Another

commonly held belief is that legalized gaming reduces crime because it eliminates incentives for illegal gambling and because it improves the local economy. Both these beliefs are based more on anecdotal rather than empirical evidence. Destination casinos, by their nature, increase the volume of people into a given community. Whenever that volume of people is introduced into a community the volume of crime is expected to increase (**Appendix N**). This holds true for any large-scale development, whether it is a shopping mall, family-oriented water park or destination casino. While more people bring more crime, for most communities, the crime rate stays the same or declines. Taken as a whole, literature on the relationship between casino gambling and crime rate suggests that communities with casinos are as safe as communities without casinos, though further research may be necessary (**Appendix N**). For example, the previously described NGISC Report investigated the causal relationship between casinos and crime. The report stated:

*“Jeremy Margolis, a former director of the Illinois State Police, who also served as assistant US attorney for the Northern District of Illinois and was the Illinois inspector general, published a comprehensive review of available information on gambling and crime. His study, “Casinos and Crime, an Analysis of the Evidence,” was based upon ten jurisdictions that have commercial casinos. In testimony before the Commission he stated that he found little documentation of a causal relationship between the two. Taken as a whole, the literature shows that communities with casinos are just as safe as communities that do not have casinos.”*

All other factors being equal, the increased employment from a casino resort (such as that proposed in Alternative A) will lead to lower unemployment rates. Because many crimes are economically motivated, a decline in unemployment should lead to lower crime. Also, because state, county, and local agencies provide a number of services and funds to the unemployed and economically disadvantaged, an increase in local unemployment should significantly reduce the need to fund activities that benefit these citizens.

According to a PricewaterhouseCoopers survey titled “Gaming Industry Employee Impact Survey,” the introduction of casino gaming eliminated the need for specific social services offered to local residents. The results of the survey indicated that 16 percent had used their casino jobs to replace unemployment benefits, 63 percent had improved their access to health care benefits and 43 percent had better access to day care for their children. In addition, 65 percent had developed new job skills as a result of their employment and 78 percent indicated that their employer provided them with training to perform their job (**Appendix N**).

A study was conducted to quantify the likely changes in crime in connection with the development of the alternatives contemplated herein, and most specifically in connection with the gaming alternatives. This analysis is included in **Appendix N**. The study analyzed police department records and data from eight communities where casinos were recently constructed. In particular, the police staffing levels and crime statistics were analyzed during the periods beginning with the opening of each gaming facility. This period spanned from approximately 2008 until 2014. The study also includes anecdotal information that

was gleaned from interviews with law enforcement personnel at the affected eight police departments. The findings of the study include:

- The majority of police departments did not add additional staff or equipment as a result of casino openings. Staffing levels of the number of sworn officers has remained steady or decline at most of the police departments analyzed, which would suggest that the casino openings did not have a significant effect on crime within the local communities. However, it should be noted that the period of study included the recent economic recession. Consequently, it is likely that police staffing levels were affected by considerations other than the opening of the casinos, and these additional considerations may include funding limitations.
- The openings of the casinos did not have a material effect on crime rates. However, the level of crime did increase, as evidenced by data regarding the number of service calls placed to the local police departments and the number of arrests. Of those facilities analyzed, approximately 27% of service calls resulted in arrests. Using the estimated 2,812 gaming positions of Alternative A, the average number of service calls and arrests from the subject gaming facilities was extrapolated to Alternative A, with the result that the operation of Alternative A is projected to result in an additional 471 service calls and 121 arrests on an annual basis.
- Service calls and arrests were mostly related to traffic incidents and non-violent offenses, including petty theft, non-violent disturbances, and DUIs.

In order to assess the fiscal impacts on County and local governments, it is necessary to estimate the incremental police staffing levels that would likely result from changes in crime that occur in connection with the operation of the alternatives. Regarding Alternative A, the resulting changes in police staffing levels would likely be the net result of the following factors:

- The estimated annual service calls and arrests of 471 and 121, respectively, associated with the operation of Alternative A.
- Decreases in crime levels associated with a lower unemployment rate and higher economic output.
- Any fiscal savings that may result from the County or local governments absorbing the increased service calls and arrests within their existing operations.

Below are two methods to estimate of the direct costs of the additional service calls and arrests. Because these estimates do not include the likely decreases in crime associated with a lower unemployment level, they likely represent a slightly conservative estimate.

The first method involves translating the time and resources related to service calls and arrests into the fiscal impact on law enforcement. Several steps are necessary to perform this cost estimate. First, the estimated service calls and arrests described above were applied onto the City of Galt Police Department budget. Although this analysis could be performed using the budget of either the Sacramento County

Sheriff's Department or the City of Galt Police Department, the latter was chosen because of the availability of recent dollar and manpower budget information. According to the City of Galt General Fund Budget for fiscal year 2014 - 2015, \$5,667,560 was budgeted for the police department (City of Galt, 2014). The Galt Police Department was then staffed by 35 officers (Bowers, 2014). The City of Galt 2014 budget includes a Police Department headcount of 54 full-time persons, including 2 lieutenants, 29 police officers and 7 sergeants. Using the estimate of 35 total officers implies that the average cost per sworn officer (including the costs of administrative staff and other costs, such as physical plant costs) are approximately \$162,000. Approximately \$119,000 of this amount represents costs of salaries and benefits for each sworn officer, with the remainder attributable to salaries and benefits of other department personnel plus non-compensation related expenses. This analysis includes assumptions regarding the time and financial resources required of a police force to perform the calls for service and arrests that are estimated to occur for Alternative A.

Based on the analysis presented in **Table 4.7-16**, the incremental costs of police services related to Alternative A is estimated at a total annual additional cost of approximately \$163,591 in 2019, which adjusts for an estimated 4 percent annual wage inflation. This amounts to an estimated \$1,352 per arrest.

**TABLE 4.7-16**  
ESTIMATED INCREMENTAL COSTS TO LOCAL POLICE DEPARTMENT –  
DIRECT COSTS OF SERVICE CALLS AND ARRESTS FOR ALTERNATIVE A

	Estimated Annual Occurrences	Time per Occurrence	Total Hours
Calls for service	471	0.625	294
Arrests	121	1.37	166
Reports (1)	236	0.75	177
Total reactive time			637
Estimated proactive time (2)			521
Investigative time (3)	60	5	300
Administrative time (4)			102
Total time			1,560
Working hours per year, per officer (5)			1,880
Percent of 1 police FTE			83%
Fully loaded cost per officer, FY 2014			\$162,000
<b>Estimated incremental cost, FY 2014</b>			<b>\$134,460</b>
Approximate wage and benefits inflation			4.0%
<b>Estimated incremental cost, FY 2019</b>			<b>\$163,591</b>
<p>Note: Most of the assumptions in this calculation were sourced from the City of Galt Walmart Draft Environmental Impact Report, Appendix F - Police Services Report Dated June 20, 2008 prepared by Robert Olson Associates, Inc. ("Walmart EIR Appendix F").</p> <ol style="list-style-type: none"> <li>Consistent with Walmart EIR Appendix F methodology, assumes that 1 report is prepared for every 2 calls for service. Report to call for service ratio in Walmart EIR Appendix F was 1 report for every 1.92 calls for service.</li> <li>Assumes that total officer time in the field is comprised of 45% proactive time and 55% reactive time.</li> <li>Consistent with Walmart EIR Appendix F methodology, assumes that approximately 50% of arrest require investigative time, and that each investigation requires approximately 5 hours.</li> <li>Consistent with Walmart EIR Appendix F methodology, estimated at 7% of the subtotal of all time, excluding Administrative time.</li> <li>Estimated by AES, assuming 2,080 full-time hours per year and 3 weeks paid vacation time.</li> </ol>			

A second method is based on annual arrest records of the City of Galt and extrapolates the related costs to the estimated service calls and arrests under Alternative A. There were 949 arrests by the Galt Police Department during 2014 (CJSC, 2015). These were comprised of felony, misdemeanor and status offence arrests of 352, 588 and 9, respectively. The majority of police work is not comprised of making arrests. However, the number of arrests by the Galt Police Department facilitates a common metric to estimate the costs of law enforcement activities. **Table 4.7-17** estimates this cost of law enforcement activities by applying a cost per arrest metric to the estimated 121 arrests attributable to Alternative A. Based on this analysis, the incremental costs of law enforcement services related to Alternative A using the second method is estimated at approximately \$527,512 in 2019, which adjusts for an estimated 4 percent annual wage inflation. This amounts to an estimated \$4,360 per arrest.

**TABLE 4.7-17**  
ESTIMATED INCREMENTAL COSTS TO LOCAL POLICE DEPARTMENT –  
COST PER ARREST METHOD FOR ALTERNATIVE A

	Number of Annual Arrests	Cost per Arrest Metric	Total Cost
Galt Police Department, 2014 arrests (1)	949	\$5,972	\$5,667,560
Approximate wage and benefits inflation		4.0%	4.0%
Estimates for Fiscal Year 2019		\$7,266	\$6,895,453
Unadjusted estimates, Alternative A	121	\$7,266	\$872,186
Adjustment for reduced acuity of crime and assistance from facility security		40%	40%
<b>Adjusted estimates, Alternative A</b>	<b>121</b>	<b>\$4,360</b>	<b>\$527,512</b>
1. Source: CJSC, 2015.			

These two methodologies result in a range of cost estimates for law enforcement effects associated with Alternative A. The first method likely understates the cost because it does not fully account for the administration, infrastructure and fixed costs of law enforcement. For example, the costs of training are not reflected in the first method. The second method likely overstates administrative and infrastructure costs because many such costs are fixed in nature, and would not likely increase because of the development of Alternative A. For example, it is unlikely that additional law enforcement facilities would be constructed because of the occurrence of Alternative A.

The estimates above were calculated using data from the Galt Police Department because such information was readily available, and not because there is a presumption that the Galt Police Department will perform the actual policing activities in connection with Alternative A. Law enforcement services may be performed by either the City of Galt or the County of Sacramento. However, it is assumed that the County of Sacramento law enforcement infrastructure, and thus its costs, are similar to those of the Galt Police Department.

In addition, because the Twin Cities site is located in what is currently unincorporated Sacramento County, but within the City of Galt sphere of influence, law enforcement costs may be allocated among Sacramento County and/or the City of Galt. The proportions in which the cost impacts will be allocated between Sacramento County and the City of Galt will depend upon a number of factors, including:

- Which municipality assumes primary responsibility for providing law enforcement services, including responding to police calls.
- In the event that the City of Galt assumes primary responsibility for providing law enforcement services, the percentage of criminal incidents that occur at the Twin Cities site that spill over north into Sacramento County, and thus require a response from the Sacramento County Sheriff's Department.
- In the event that Sacramento County assumes primary responsibility for providing law enforcement services, the percentage of criminal incidents that occur at the Twin Cities site that spill over into the City of Galt, and thus require a response from the City of Galt Police Department.

In the event that Sacramento County assumes primary responsibility for providing law enforcement services, the percentage of activities on the Twin Cities site requiring the Sheriff's Department's attention may be offset to some degree by reduced activity elsewhere in the County (i.e., the substitution effect).

Alternative A would introduce a large number of patrons and employees into the community on a daily basis. As a result, under Alternative A, criminal incidents would be expected to increase in the project area, particularly at the selected project site, as with any other development of this size. However, increased tax revenues resulting from Alternative A and local agreements between the Tribe, County, and City, including the 2016 MOU with Sacramento County (**Appendix B**), would fund expansion of law enforcement services required to accommodate planned growth (refer to **Section 4.10**). Thus, mitigation included in **Section 5.7** would mitigate impacts from Alternative A associated with crime to a less than significant level. Mitigation to address the impact of a possible increase in crime is listed in **Section 5.7**, and the associated mitigation for impacts to law enforcement, are included in **Section 5.10.3**.

## **Community Effects**

### ***Schools***

Employees that relocate to the project area to accept a position at the project site may increase the number of kindergarten through 12<sup>th</sup> grade students enrolled in the Galt Joint Union Elementary School District (GJUESD) and the Galt Joint Union High School District (GJUHSD). However, due to the limited number of employees that are expected to relocate to the project area as a result of Alternative A, as noted in the *Employment* and *Housing* sections above, it is expected that these effects would be negligible. Additionally, given that any anticipated new students would be distributed across all grade levels kindergarten through high school, any new students that may enroll in the Galt school districts as a result

of the project would be considered a nominal impact on the district. Further, if Alternative A were to result in the relocation of any families to the area, the schools would likely collect additional tax revenue from the families of new students and would use these taxes to hire additional teachers to meet additional demand, if necessary. Therefore, any potential increased enrollment would have a nominal effect on the ability of Galt school districts to provide education services at existing levels. It should also be noted that although the Twin Cities site is located north of Galt City limits, the greater project area encompasses other communities larger than the City of Galt. Some portion of employees who may relocate to the area will choose to reside in unincorporated Sacramento County, and in nearby cities such as Elk Grove and Lodi. This will further dissipate effects on Galt schools. Alternative A would not result in adverse impacts to the schools of Galt or other nearby communities. No mitigation is required.

### ***Libraries and Parks***

Effects to area libraries and parks could occur if the employees or patrons of Alternative A significantly increase the demand on these resources. Due to the limited number of employees expected to relocate due to Alternative A, as noted in the *Housing* section above, it is expected that these effects would be negligible. Additionally, due to the location of Alternative A, it is not anticipated that patrons would frequent local libraries or parks. Therefore, there would be a less than significant effect to libraries and parks. No mitigation is required.

### **Effects to the Wilton Rancheria Tribe**

Alternative A would benefit the Wilton Rancheria Tribe in at least two ways. First, it would generate new income to fund the operation of the Tribal Government. This income is anticipated to have a beneficial effect on Tribal attitudes, expectations, quality of life, and culture by funding Tribal programs that serve Tribal members, including education, health care, housing, social services, and Tribally-sponsored cultural events, and by supporting Tribal self-sufficiency and self-determination. As indicated in the Wilton Rancheria Tribe Unmet Needs Report, essential governmental, social, and other tribal member services that would be funded by the revenue generated under Alternative A include: enhancement of health, housing, education, tribal government, and resource protection programs (**Appendix C**). Secondly, Tribal members would have access to new jobs created on the project site. Employment generated by this alternative would not only allow Tribal members to enjoy a better standard of living, but would also provide an opportunity for Tribal members to reduce or end their dependence on government funding. As discussed in **Section 3.7.1**, approximately 62 percent of the Tribe's families live below the federal poverty line. Therefore, the creation of employment opportunities is expected to benefit Tribal members as well as local taxpayers in general.

The casino is projected to generate millions of dollars annually for the Tribe. According to the Indian Gaming Regulatory Act (IGRA) 25 U.S.C. Section 2710 (b)(2)(B),

*“...net revenues from any tribal gaming are not to be used for purposes other than (i) to fund tribal government operations or programs; (ii) to provide for the general welfare of the Indian tribe and its members; (iii) to promote tribal economic development; (iv) to donate to charitable organizations; or (v) to help fund operations of local government agencies.”*

IGRA also requires that the Tribe develop a plan to use gaming revenues for these purposes, which must be approved by the Secretary of the Interior, before making any distributions to individual Tribal members.

### **Environmental Justice: Minority and Low-Income Communities**

**Section 3.7.3** describes local populations near the project site that could be affected by development of Alternative A to determine if any minority or low-income populations exist. The review of the demographics of census tracts in the vicinity of the Twin Cities site showed that some areas contain a substantial minority community but none are low-income communities. The project would inherently impact members of the Wilton Rancheria, and the Tribe is considered a minority community that would be affected by Alternative A. Effects to the Tribe are positive in nature and discussed above; effects to other minority communities would be positive. Specifically the increased economic development and opportunity for employment would positively affect other minority communities. For example, as discussed above, the operation of Alternative A is expected to result in 2,879 employment positions at the Twin Cities site. The majority of these positions will likely be occupied by current residents of the Counties, many of which are either unemployed or underemployed. Minority and low-income residents in the Counties currently comprise a significant portion of those persons who are unemployed, and consequently will likely experience substantial positive socioeconomic benefits as a result of Alternative A. These benefits will likely occur in the form of more and better employment, and the social improvements that are related thereto.

Other effects to minority and low-income persons, such as traffic, air quality, noise, etc. would be neutral, after the implementation of the specific mitigation measures related to these environmental effects. Therefore, with the implementation of the mitigation measures described in **Section 5.0**, Alternative A would not result in significant adverse effects to minority or low-income communities.

### **4.7.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

#### **Economic Effects**

The direct economic effects for both construction and operation of Alternative B are comparable to those described for Alternative A, but to a lesser scale since Alternative B is reduced in size and scope.

**Construction**

Under Alternative B, construction and development activities are estimated to cost approximately \$225.9 million, which is expected to generate a one-time total output of approximately \$262.4 million within the Counties (**Table 4.7-1**). Direct output is estimated to total approximately \$170.0 million. Indirect and induced outputs are estimated to total \$43.3 million and \$49.2 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region.

Construction of Alternative B would generate substantial output to a variety of businesses in the Counties in a variety of industries, including construction, manufacturing, professional services, and trade. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that is similar to but less than the beneficial impact of Alternative A.

Construction of Alternative B would also generate substantial output to businesses within the city limits of the City of Galt. Similar to the effect upon the Counties, some of the direct output of the project would flow to City of Galt businesses, which would in turn increase their spending and labor demand, thereby further simulating the Galt economy. Under Alternative B, total construction related direct, indirect and induced output are estimated at \$32.6 million, \$3.1 million and \$4.3 million, respectively within the city limits of Galt (**Table 4.7-2**).

**Operation**

Under build-out conditions in 2019, Alternative B is expected to generate an annual total output of approximately \$332.9 million within the Counties (**Table 4.7-3**). Direct output is estimated to total approximately \$221.8 million, of which approximately \$189.8 million would be attributed to the gaming and entertainment industry. Indirect and induced outputs are estimated to total \$54.7 million and \$56.5 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region.

Operation of Alternative B would generate increased revenues for a variety of businesses in the Counties as a result of increased economic activities. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that is less than the beneficial impact of Alternative A.

Expenditures on goods and services from the operation of Alternative B are also anticipated to have a significant effect within the city limits of Galt. Under Alternative B, total direct, indirect and induced output from the project's operations in the city limits of Galt are estimated at \$61.3 million, \$6.0 million and \$4.7 million, respectively (**Table 4.7-4**).

## ***Substitution Effects***

### *Existing Tribal Casino Gaming Market Substitution Effects*

Under Alternative B, a portion of revenue may be transferred from other tribal casinos through substitution. As noted under Alternative A, whenever a new casino opens in a market area, a certain amount of market substitution is to be expected. Alternative B is anticipated to cause a decline in gaming revenue to competing gaming facilities (**Appendix U**). See **Table 4.7-5** for the anticipated substitution effect on these and other tribal casinos. This loss of total revenue at competing tribal casinos is not anticipated to significantly impact these casinos or to cause their closure. Estimated substitution effects are anticipated to diminish after the first year of the project's operation because local residents will have experienced the casino and will gradually return to more typical and more diverse spending patterns. Substitution effects also tend to diminish after the first full year of operations because, over time, growth in the total population and economic growth tend to increase the dollar value of demand for particular goods and services. Therefore, substitution effects resulting from Alternative B to competing gaming facility revenues are not anticipated to significantly impact these casinos, or to cause their closure, or to significantly impact the ability of these tribal governments to provide essential services and facilities to their memberships.

### *Licensed Cardroom Substitution Effects*

Substitution effects to licensed cardrooms are analyzed in the supplement to Appendix H provided in the Final EIS and discussed above for Alternative A in **Section 4.7.1**. Because Alternative B is smaller in scope than Alternative A and because Alternative A's effects are less than significant, the substitution effects to licensed cardrooms would be less than significant as well.

### *Non-Gaming Substitution Effects*

Similar to Alternative A, potential non-gaming substitution effects, should they occur, represent a negligible portion of total economic activity that would be generated by Alternative B. As discussed in **Section 4.7.1**, it is likely that the operation of the proposed casino will stimulate local retail and restaurant businesses by drawing customers from outside the local area. This effect is anticipated to offset any substitution effects to non-gaming businesses. Thus, as with Alternative A, no significant non-gaming substitution effects would occur as a result of Alternative B.

## ***Fiscal Effects***

Alternative B would result in a variety of fiscal impacts. As described in **Section 2.3**, Alternative B would include the transfer of seven parcels from fee status into federal trust for the benefit of the Tribe, resulting in the loss of local property taxes. As shown in **Table 3.7-7**, during the 2013-2014 fiscal year, the Twin Cities site generated \$30,964 of property tax income for state, county, and local governments. Such lost property taxes would be more than offset by tax revenues generated for state and local governments from economic activity associated with construction and operation of Alternative A. These estimated tax revenues are summarized in **Tables 4.7-8** and **4.7-9**. Tax revenues would be generated for

federal, state and local governments from the same activities discussed in Alternative A. Additionally, the 2011 MOU provides a framework for the Tribe to negotiate payments that could be made by the Tribe to the State and local governments to provide support for public services, community benefits, and utilities (**Appendix B**).

For Alternative B, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, counties, and local governments. Construction would result in an estimated \$18.3 million in federal tax revenues, and \$10.3 million in state/county/local government tax revenues. Operation of Alternative B would result in an estimated \$26.0 million in federal tax revenues and \$11.4 million in state/county/local government tax revenues annually (**Table 4.7-8**). Actual annual tax revenues generated by the project may be greater than those indicated above as direct personal income tax is not accounted for in the operational tax revenue estimate.

In summary, in the absence of mitigation, the net fiscal impact on the Counties and the City of Galt are neutral to negative on balance. Although the project will provide increased taxes, some of which will flow to the Counties and the City of Galt, Alternative B will also result in an increase use of public services, increased uses of local roadways and infrastructure, and higher utility usage. The 2011 Memorandum of Understanding (2011 MOU) provides a framework for the Tribe to compensate Sacramento County and/or the City of Elk Grove for public services, community benefits and utilities (**Appendix B**).

The net increase in tax revenues, in combination with the implementation of the mitigation measures outlined in **Section 5.7** and **5.10**, would adequately fund the increase in demand for public services. Consequently, the various alternatives, including Alternative B, would not result in adverse socioeconomic effects.

### ***Property Values***

Impacts to the values of properties in the vicinity of the project site would be similar to the impacts under Alternative A. However, because Alternative B is smaller in size compared to Alternative A, the resulting impacts on property values are likely to be smaller than those that would occur under Alternative A. Those impacts are anticipated to be neutral.

### ***Summary of Economic Effects***

Construction and operation of the Alternative B would generate substantial economic output for a variety of businesses in the Counties. Additionally, Alternative B would generate substantial tax revenues for state, county, and local governments. Overall, Alternative B, in combination with the implementation of the mitigation measures specified in **Sections 5.7** and **5.10**, would result in a beneficial impact to the local economy that would be less beneficial than Alternative A.

## **Employment**

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages. The IMPLAN model was used to estimate employment opportunities generated by Alternative B.

### ***Construction***

Under Alternative B, investment in construction activities would generate a one-time total of approximately 1,681 employment positions within the Counties during the construction phase (**Table 4.7-11**). Indirect and induced employment opportunities are estimated to result in 282 and 360 employment opportunities, respectively.

Under Alternative B, investment in construction activities would generate one-time total wages of approximately \$104.2 million within the Counties (**Table 4.7-11**). Direct wages are estimated to total approximately \$69.7 million, while indirect and induced wages are estimated to total \$17.6 million and \$16.9 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the construction phase is considered a beneficial effect of Alternative B that is less than the beneficial effects of Alternative A.

### ***Operation***

As calculated through IMPLAN, operation activities associated with Alternative B would generate an annual total of approximately 2,380 employment opportunities captured within the Counties (**Table 4.7-14**). Direct employment impacts are estimated to total approximately 1,674 job opportunities. Indirect and induced employment opportunities are estimated to total 338 and 369, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the local area.

Investment in operational activities associated with Alternative B would generate annual total wages of approximately \$119.3 million within the Counties (**Table 4.7-14**). Direct wages are estimated to total approximately \$79.6 million, of which approximately \$61.7 million would be attributed to the gaming and entertainment industry. Indirect and induced wages are estimated to total \$20.6 million and \$19.2 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the operation phase is considered a beneficial effect of Alternative B that is less than the beneficial effects of Alternative A.

### ***Summary of Employment Effects***

Construction and operation of Alternative B would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in the

Counties. Given the projected unemployment rate, and the dynamics of the local labor market, the Counties are anticipated to be able to accommodate the increased demand for labor during the operation of Alternative A. This would result in employment and wages for persons previously unemployed, increasing the ability of the population to provide themselves with health and safety services and contributing to the alleviation of poverty among lower income households. While employment opportunities at existing gaming facilities may temporarily be reduced proportional to the estimated substitution effect described previously, the net impact to employment opportunities as a result of Alternative B would be positive. This is considered a beneficial effect that is less than the beneficial effects of Alternative A.

## **Housing**

The 2019 housing market in the Counties as discussed under Alternative A would fulfill the demands for housing under Alternative B. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**. This impact would be comparable, but to a lesser extent, than Alternative A. Alternative B would not result in significant adverse effects to the housing market.

## **Social Effects**

Social impacts including pathological and problem gambling, and crime from Alternative B would be comparable but to a lesser extent than Alternative A, since Alternative B is reduced in size and scope. Mitigation is included in **Section 5.7**.

## **Community Effects**

### ***Schools***

Effects to schools would be similar to, but less than those described under Alternative A because Alternative B is reduced in size and scope. This would be considered a less than significant impact. No mitigation is required.

### ***Libraries and Parks***

Effects to libraries and parks would be similar to those described under Alternative A, and therefore, less than significant. No mitigation is required.

## **Effects to the Wilton Rancheria Tribe**

The effects to the Wilton Rancheria under Alternative B are comparable to those described for Alternative A, but to a lesser scale since Alternative B is reduced in size and scope. Alternative B would not generate a sufficient amount of revenue to fund all essential governmental, social, and other services indicated in the Wilton Rancheria's unmet needs report (**Appendix C**).

## Environmental Justice: Minority and Low-Income Communities

The review of the demographics of census tracts in the vicinity of the Twin Cities site (**Section 4.7.3**) showed that some areas contain a substantial minority community but none are low-income communities. The Wilton Rancheria is considered a minority community that would be impacted by Alternative B. Effects to the Tribe are positive in nature and discussed above, effects to the other minority communities would be positive. Specifically, the increased economic development and opportunity for employment would positively affect other minorities, and other effects, such as traffic, air quality, noise, etc. would be neutral, after the implementation of the specific mitigation measures related to these environmental effects. Therefore, with the implementation of the mitigation measures described in **Section 5.0**, Alternative B would not result in significant adverse effects to minority or low-income communities.

### 4.7.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE

#### Economic Effects

The direct economic effects for the construction of Alternative C are somewhat similar to those described for Alternative A, because Alternative C is approximately the same size and scope, though somewhat smaller. The economic effects from the operation of Alternative C differ materially from Alternatives A and B because Alternative C is a retail development, whereas Alternatives A and B are gaming venues.

#### *Construction*

Under Alternative C, construction and development activities are estimated to cost approximately \$266.8 million, which is expected to generate a one-time total output of approximately \$382.8 million within the Counties (**Table 4.7-1**). Direct construction related output is estimated to total approximately \$248.7 million. Indirect and induced outputs are estimated to total \$63.4 million and \$70.8 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the area.

Construction of Alternative C would generate substantial output to a variety of businesses in the Counties. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that would be less beneficial than Alternatives A and B.

Construction of Alternative C would also generate substantial output to businesses within the city limits of the City of Galt. Similar to the effect upon the Counties, some of the direct output of the project would flow to the City of Galt businesses, which would in turn increase their spending and labor demand, thereby further simulating the City of Galt economy. Under Alternative C, total construction related direct, indirect and induced output are estimated at \$46.9 million, \$4.5 million and \$6.2 million, respectively, within Galt city limits (**Table 4.7-2**).

### **Operation**

Alternative C is expected to generate an annual total output of between \$35.1 million and \$57.8 million within the Counties (**Table 4.7-3**), after netting out substitution effects. Direct output is estimated to total between approximately \$23.6 million and \$38.9 million after substitution effects. Indirect and induced outputs are estimated to total between \$4.4 million and \$7.2 million, and between \$7.1 million and \$11.7 million, respectively, after substitution effects. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the Counties.

Operation of Alternative C would generate substantial output to a variety of businesses in the Counties. Output received by local businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that would be less beneficial than Alternatives A and B.

Expenditures on goods and services from the operation of Alternative C are also anticipated to have a significant effect within the city limits of Galt. Under Alternative C, total direct, indirect and induced output from the project's operations in the City of Galt are estimated to occur within a range. The low end of the range of direct, indirect and induced output is estimated at \$34.1 million, \$5.6 million and \$2.1 million, respectively. The high end of the range is estimated at \$41.7 million, \$6.9 million and \$2.6 million, respectively (**Table 4.7-4**).

### **Substitution Effects**

#### *Existing Tribal Casino Gaming Market Substitution Effects*

Substitution effects to existing gaming venues are not applicable because Alternative C does not have a gaming component.

#### *Licensed Cardroom Substitution Effects*

Substitution effects to existing licensed cardrooms are not applicable because Alternative C does not have a gaming component.

#### *Non-Gaming Substitution Effects - Sacramento and San Joaquin County Retailers*

The above two County analysis assumes that approximately 25 percent to 35 percent of the direct, indirect and induced operating outputs of the project would accrue to the two County region on a net basis, after the consideration of substitution effects (**Appendix H**). This implies a substitution effect of 65 percent to 75 percent. This gives rise to the difference between the gross operational output of the project, and the net effects listed in **Table 4.7-3**. Substitution effects within the two County region would dissipate substantially in the years following opening, as population growth and general growth in the economy absorb the extra capacity brought into the marketplace by the new development.

*Non-Gaming Substitution Effects - City of Galt Retailers*

A retail market study was conducted to analyze retail development opportunities for the project site (**Appendix U**). The retail market study evaluated existing retail offerings at nearby casinos and noted no competitor had substantial retail offering; at most, competitors offered only gift shops and/or convenience stores. Thus, the retail market study concluded Alternative C would not have meaningful substitution effects on the non-gaming components of casinos in the region (**Appendix U**).

A competitive effects study was conducted in connection with the recent Environmental Impact Report for a proposed Walmart to be constructed in the City of Galt (“2009 Walmart Draft EIR”). This Walmart, which opened for business in late 2014, is located approximately a half-mile southeast of the Twin Cities site and is primarily accessed from the Highway (Hwy) 99 Twin Cities interchange. Included as exhibits to the 2009 Walmart Draft EIR was an Exhibit G, an economic impact analysis completed by CBRE Consulting, Inc. dated April 2008, and an Exhibit H, an updated memorandum completed by CBRE Consulting, Inc. dated August 7, 2009 (collectively the “CBRE Reports”). The CBRE Reports estimated the likely substitution effects that would accrue to existing retail businesses as a result of the Walmart project. Some of the conclusions rendered in the CBRE Reports included the following:

- Approximately 95 percent of the Galt Walmart sales were projected to be generated by primary and secondary market area residents, including residents from the City of Galt and nearby unincorporated areas in Sacramento and San Joaquin counties.
- City of Galt retailers capture approximately 57.7 percent of spending generated by Galt residents. The remaining 42.3 percent of resident spending is lost, or “leaked,” to retailers in other cities.
- Most of this loss occurs in four of Walmart’s categories, which are apparel, general merchandise, home furnishings and appliances, and “other retail.”
- Food stores is the one category of Walmart’s retail offering where the leakage is lowest.
- It is estimated that the substitution effect to local food stores from the Walmart will initially be \$6.5 million per year, which equates to 4.3 percent of existing retail sales for food stores in the City of Galt. Stated differently, the \$6.5 million represents approximately 9.7 percent of Walmart’s \$66.8 million of estimated year 1 revenues and approximately 31.4 percent of Walmart’s estimated year 1 \$20.7 million in food store revenues.

The results of the CBRE Reports are applicable to Alternative C. The estimated first year annual retail sales of Alternative C equals \$330.1 million, which is slightly less than five times the estimated sales of the Galt Walmart store. The mix of year 1 sales is comprised of the following categories and amounts (**Appendix U**):

- |                        |                 |
|------------------------|-----------------|
| ▪ Miscellaneous retail | \$68.0 million  |
| ▪ Restaurants          | \$17.4 million  |
| ▪ Super grocery store  | \$76.0 million  |
| ▪ Membership warehouse | \$114.6 million |

- Home improvement \$52.1 million
- Gas station / car wash \$2.0 million

This retail sales mix is similar to the Galt Walmart. Consequently, the grocery component of Alternative C should result in an estimable substitution effect to local retailers whereas the other components should not result in a significant impact. It should also be noted that membership warehouses contain a significant food / grocery component. For example, the Report 10-K for Costco Wholesale Corp., listed the following sales mix for its fiscal year ended August 31, 2014:

- Food (e.g., dry and institutionally packaged foods) 22%
- Sundries (e.g., snack foods, candy, tobacco, beverages and institutional supplies) 21%
- Hardlines (e.g., major appliances, electronics and beauty aids) 16%
- Fresh food (e.g., meat, produce, deli, and bakery) 13%
- Softlines (e.g., apparel, small appliances, and home furnishings) 11%
- Ancillary and other (e.g., gas stations, pharmacy, food court and optical) 17%

The merchandise categories of Costco Wholesale Corp. are not precisely comparable to that of a grocery store. Nevertheless, approximately half of the “food” category and 100 percent of both the “sundries” and “fresh food” are representative of a typical grocery merchandise offering. Collectively, these categories total to approximately 45 percent of Costco Wholesale Corp. sales.

As described above, the sales mix of Alternative C is comprised of an estimated \$76.0 million of grocery and \$114.6 million of membership warehouse sales. Approximately 45 percent of the membership warehouse would be comprised of grocery items, or approximately \$51.8 million. On a combined basis, the grocery component and the membership warehouse component of Alternative C would derive approximately \$127.6 million from food / grocery items. Extrapolating the Walmart substitution effect from the food/grocery component to Alternative C would imply a substitution effect of approximately 31.7 percent of the Alternative C food / grocery category, which equals approximately \$40.5 million during the first full year of operations. Assuming that food / grocery sales in Galt have not increased since the publication of the CBRE Reports, a conservative assumption for the purposes of this analysis, the \$40.5 million in sales would equal a substitution effect of approximately 26.8 percent of food / grocery sales that occur in the City of Galt.

These substitution effects are anticipated to diminish after the first year of the project’s operation due to economic growth and growth in the population. Economic prospects for Galt retailers have, on the whole, improved subsequent to the substitution analysis included in the aforementioned 2009 Walmart Draft EIR. Furthermore, under a worst case scenario where marginal existing food / grocery retailers experience large drops in sales, such retailers could re-tenant to other retail uses. The development of Alternative C would have a neutral to beneficial effect on the value and prospects of unimproved commercial land because commercial development of a type compatible with surrounding land uses

typically stimulates additional economic activity and thus rising prices of developable land. Consequently, substitution effects would not be of a magnitude that would cause a physical effect to the environment (such as urban blight). Therefore, the effect to the physical environment would not be substantial and no mitigation is recommended.

### ***Fiscal Effects***

Alternative C would result in a variety of fiscal impacts that are similar to those described under Alternative A and B above. As described in **Section 2.3.1**, **Section 4.7.2**, and **Table 3.7-7**, Alternative C would result in the loss of local property taxes, which would be more than offset by tax revenues generated for state and local governments from economic activity associated with construction and operation of Alternative C. These estimated tax revenues are summarized in **Tables 4.7-8** and **4.7-9**. Additionally, the 2011 MOU provides a framework for the Tribe to negotiate payments that could be made by the Tribe to the State and local governments to provide support for public services, community benefits, and utilities (**Appendix B**).

For Alternative C, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, county, and local governments. Construction would result in an estimated \$26.5 million in federal tax revenues, and \$14.9 million in state/county/local government tax revenues. Operation of Alternative C would result in an estimated \$5.3 million to \$6.6 million in federal tax revenues, and \$2.5 million to \$3.6 million in state/county/local government tax revenues (**Table 4.7-8**) from indirect and induced taxes. Actual annual tax revenues generated by the project may be greater than those indicated above as direct personal income tax is not accounted for in the operational tax revenue estimate.

In summary, in the absence of mitigation, the net fiscal impact on the Counties and the City of Galt are neutral to negative on balance. Although the project will provide increased taxes, some of which will flow to the Counties and the City of Galt, Alternative C will also result in an increase use of public services, increased uses of local roadways and infrastructure, and higher utility usage. The 2011 Memorandum of Understanding (2011 MOU) provides a framework for the Tribe to compensate Sacramento County and/or the City of Elk Grove for public services, community benefits and utilities (**Appendix B**).

The net increase in tax revenues, in combination with the implementation of the mitigation measures outlined in **Section 5.7** and **5.10**, would adequately fund the increase in demand for public services. Consequently, the various alternatives, including Alternative C, would not result in adverse socioeconomic effects.

### ***Property Values***

Impacts to the values of properties in the vicinity of the project site would be similar to the impacts under Alternative A, although slightly smaller because Alternative C is slightly smaller in scope than Alternative A. Although Alternative C is a retail project and not a casino resort, both retail and gaming developments are considered “commercial” properties. Consequently, the resulting impacts on property values are likely to be similar to, though smaller, than those that would occur under Alternative A.

### ***Summary of Economic Effects***

Construction and operation of the Alternative C would generate substantial economic output to a variety of businesses in the Counties. Additionally, Alternative C would generate tax revenues for state, county, and local governments; however, revenue sharing benefits would not occur. Overall, Alternative C, in combination with the implementation of the mitigation measures specified in **Sections 5.7 and 5.10**, would result in a beneficial impact to the local economy, but to a lesser degree than Alternative A.

### ***Employment***

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages. The IMPLAN model was used to estimate employment opportunities generated by Alternative C.

### ***Construction***

Under Alternative C, investment in construction activities would generate a one-time total of approximately 2,423 employment opportunities within the local area during the construction phase (**Table 4.7-11**). Direct employment is estimated to total approximately 1,417 employment opportunities in the construction industry. Indirect and induced employment opportunities are estimated to result in 412 and 518 employment opportunities, respectively.

Under Alternative C, investment in construction activities would generate one-time total wages of approximately \$149.9 million within the Counties (**Table 4.7-11**). Direct wages are estimated to total approximately \$96.2 million. Indirect and induced wages are estimated to total \$25.6 million and \$24.3 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the Counties. The generation of employment and wages during the construction phase is considered a beneficial effect of Alternative C that is less beneficial than Alternatives A and B.

### ***Operation***

As calculated through IMPLAN, operation activities associated with Alternative C would generate an annual total of between approximately 707 and 844 employment opportunities, captured within the Counties (**Table 4.7-14**). Direct employment impacts are estimated to total between approximately 588

and 691 job opportunities. Indirect and induced employment opportunities are estimated to total between 26 and 43, and between 93 and 110, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the local economy.

Under Alternative C, investment in operational activities would generate annual total wages of between approximately \$28.6 million and \$34.3 million within the Counties (**Table 4.7-14**). Direct wages in the Counties are estimated to total between approximately \$22.3 million and \$26.2 million. Indirect and induced wages in the Counties are estimated to total between approximately \$1.5 million and \$2.4 million, and between \$4.8 million and \$5.7 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the Counties. The generation of employment and wages during the operation phase is considered a beneficial effect of Alternative C that is less beneficial than Alternatives A and B.

The substitution effects to local retailers described above in the “Substitution Effects” section would potentially reduce employment at such retailers. The wages and job growth illustrated in **Table 4.7-14** are after reductions in employment due to substitution effects. Specifically, although the output from operations are assumed to be subject to a substitution effect of approximately 65 percent to 75 percent (**Appendix H**) within the two County region, it is assumed that wages and job positions would be subject to an approximate 50 percent substitution effect. Decreases in sales revenues of existing competing facilities would not be offset one-for-one by declines in job positions, but rather would also be reflected in lower profit margins of such competing facilities. As described above, the upper bound of substitution effects is equal to approximately 31.7 percent of the first full year of sales of Alternative C, with substitution effects declining in subsequent years. This would be the substitution effect prior to the implementation of mitigation measures. Because employment opportunities and wages are approximately proportional to revenues, the increase and employment opportunities and wage growth described above would likely be reduced by approximately 31.7 percent during the first full year of operations. The offsetting impact of substitution effects would be reduced in subsequent years as the substitution effects diminish.

### ***Summary of Employment Effects***

Construction and operation of Alternative C would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in the Counties. Given the projected unemployment rate, and the dynamics of the local labor market, it is anticipated that the existing labor force in the Counties will be able to accommodate the increased demand for labor during the operation of Alternative C. This would result in employment and wages for persons previously unemployed, increasing the ability of the population to provide themselves with health and safety services and contributing to the alleviation of poverty among lower income households. Alternative C has a beneficial effect to employment, but is less beneficial than Alternatives A and B.

## **Housing**

The 2019 housing market in the Counties as discussed under Alternative A would fulfill the demands for housing under Alternative C. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**. This impact would be comparable, but to a lesser extent, than Alternative A. Alternative C would not result in significant adverse effects to the housing market.

## **Social Effects**

Social impacts including crime from Alternative C would be comparable Alternative A, but to a lesser extent. Mitigation in **Section 5.7** would ensure no adverse social impacts would occur.

## **Community Effects**

### ***Schools***

Effects to schools would be similar to, but less than those described under Alternative A because Alternative C is reduced in size and scope. This would be considered a less-than-significant impact. No mitigation is required.

### ***Libraries and Parks***

Effects to libraries and parks would be similar to those described under Alternative A, and therefore, less than significant. No mitigation is required.

## **Effects to the Wilton Rancheria Tribe**

The revenues generated by the proposed retail establishment would not be collected by the Tribe; however, the Tribe would collect revenues from leases signed by retailers. The effects to the Tribe under Alternative C would be beneficial, but to a lesser scale than Alternatives A or B.

## **Environmental Justice: Minority and Low-Income Communities**

The review of the demographics of census tracts in the vicinity of the Twin Cities site (**Section 3.7.3**) showed that some areas contain a substantial minority community but none are low-income communities. The Wilton Rancheria is considered a minority community that would be impacted by Alternative C. Effects to the Tribe are positive in nature and discussed above; effects to the other minority communities would be positive. Specifically, the increased economic development and opportunity for employment would positively affect other minority communities, and other effects, such as traffic, air quality, noise, etc. would be neutral, after the implementation of the specific mitigation measures related to these environmental effects. Therefore, with the implementation of the mitigation measures described in Section 5.0, Alternative C would not result in significant adverse effects to minority or low-income communities.

#### 4.7.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE

##### **Economic Effects**

The direct economic effects for both construction and operation of Alternative D are comparable to those described for Alternative A since the developments are similar in size and scope. However, note that the separate City of Galt analyses performed in **Section 4.7.1** are not applicable to Alternative D because the Historic Rancheria Site is not located in close proximity to the City of Galt.

##### **Construction**

Under Alternative D, construction and development activities are estimated to cost approximately \$348.2 million, which is expected to generate a one-time total output of approximately \$444.6 million within the Counties (**Table 4.7-1**). Direct output is estimated to total approximately \$288.6 million. Indirect and induced outputs in the Counties are estimated to total \$73.7 million and \$82.4 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region.

Because Alternative D is located well within the borders of Sacramento County, and because Sacramento County is larger than San Joaquin County in terms of populations and economic activity, it is estimated that the vast majority of the construction and operational output described above would accrue to persons and businesses that reside in Sacramento County. This is also true for Alternatives E and F.

Construction of Alternative D would generate substantial output to a variety of businesses in the Counties in a variety of industries, including construction, manufacturing, professional services, and trade. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact similar to that of Alternative A.

##### **Operation**

Under build-out conditions in 2019, Alternative D is expected to generate an annual total output of approximately \$361.9 million within the Counties (**Table 4.7-3**). Direct output is estimated to total approximately \$241.0 million, of which approximately \$202.5 million would be attributed to the gaming and entertainment industry. Indirect and induced outputs in the Counties are estimated to total \$59.8 million and \$61.1 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the local area.

Operation of Alternative D would generate increased revenues for a variety of businesses in the Counties as a result of increased economic activities. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that is similar to that of Alternative A.

### ***Substitution Effects***

#### *Existing Tribal Casino Gaming Market Substitution Effects*

Under Alternative D, a portion of revenue may be transferred from other local businesses through substitution. As noted under Alternative A, whenever a new casino opens in a market area, a certain amount of market substitution is to be expected. Alternative D is anticipated to cause a decline in gaming revenue to competing facilities (**Appendix U**); refer to **Table 4.7-5**. However, this loss of total revenue at competing tribal casinos is not anticipated to significantly impact these casinos, or to cause their closure, or to impact the ability of these tribal governments to provide essential services and facilities to their memberships. Estimated substitution effects are anticipated to diminish after the first year of the project's operation because local residents will have experienced the casino and will gradually return to more typical and more diverse spending patterns. Substitution effects also tend to diminish after the first full year of operations because, over time, growth in the total population and economic growth tend to increase the dollar value of demand for particular goods and services. Therefore, substitution effects resulting from Alternative D to competing gaming facility revenues would not impact the ability of these tribal governments to provide essential services to their memberships.

#### *Licensed Cardroom Substitution Effects*

Substitution effects to licensed cardrooms are analyzed in the supplement to **Appendix H** provided in the Final EIS and discussed above for Alternative A in **Section 4.7.1**. Because Alternative D is projected to generate less revenue than Alternative A, which has a less-than-significant effect, the substitution effects to licensed cardrooms also would be less than significant.

#### *Non-Gaming Substitution Effects*

Similar to Alternative A, potential non-gaming substitution effects, should they occur, represent a negligible portion of total economic activity that would be generated by Alternative D. As discussed in **Section 4.7.1**, it is likely that the operation of the proposed casino will stimulate the local retail and restaurant business by drawing customers from outside the local area. This effect would offset any substitution effects to non-gaming businesses. Thus, as with Alternative A, it is not anticipated that significant non-gaming substitution effects would occur as a result of Alternative D.

### ***Fiscal Effects***

Alternative D would result in a variety of fiscal impacts. Similar to Alternative A, under Alternative D the Tribe would not pay corporate income taxes on revenue or property taxes on tribal trust land. In addition, Alternative D would increase demand for public services, resulting in increased costs for local governments to provide these services. Tax revenues would be generated for federal, state and local governments from the same activities discussed in Alternative A. Alternative D involves taking the four parcels that make up the Historic Rancheria site into trust on behalf of the Tribe, which would result in the loss of approximately \$11,979 of property tax income for state, county, and local governments (**Table 3.7-8**). Additionally, the 2011 MOU provides a framework for the Tribe to negotiate payments that could

be made by the Tribe to the State and local governments to provide support for public services, community benefits, and utilities (**Appendix B**).

For Alternative D, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, counties, and local governments. Construction would result in an estimated \$30.8 million in federal tax revenues, and \$17.3 million in state/county/local government tax revenues. Operation of Alternative D would result in an estimated \$28.2 million in federal tax revenues and \$12.4 million in state/county/local government tax revenues annually (**Table 4.7-8**). Actual annual tax revenues generated by the project may be greater than those indicated above as direct personal income tax is not accounted for in the operational tax revenue estimate.

In summary, the net impact to tax revenues as a result of Alternative D would be similar to those for Alternative A. With the implementation of the mitigation measures outlined in **Section 5.7**, implementation of Alternative D would not result in adverse socioeconomic effects.

### ***Property Values***

Impacts to the values of properties in the vicinity of the project site would be similar to the impacts under Alternative A, however the mix of existing land uses in the vicinity of the Rancheria site differs from the land uses in the vicinity of the Twin Cities site. Specifically, the land uses in the vicinity of the Historic Rancheria site are mostly agricultural and rural uses, with some low density residential. Consequently, the impact of Alternative D on surrounding property values may be slightly more negative than the effects under Alternative A. Because the effects on Alternative A on surrounding property values are estimated to be neutral, Alternative D may have a neutral to slightly negative effect on surrounding property values.

### ***Summary of Economic Effects***

Construction and operation of the Alternative D would generate substantial economic output for a variety of businesses in the Counties. Additionally, Alternative D would generate substantial tax revenues for state, county, and local governments. Overall, Alternative D, in combination with the implementation of the mitigation measures outlined in **Section 5.7**, would result in a beneficial impact to the local economy that would be similar to that of Alternative A.

### **Employment**

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages. The IMPLAN model was used to estimate employment opportunities generated by Alternative D.

### ***Construction***

Under Alternative D, investment in construction activities would generate a one-time total of approximately 2,815 employment positions within the Counties during the construction phase (**Table 4.7-**

11). Indirect and induced employment opportunities are estimated to result in 478 and 603 employment opportunities, respectively.

Under Alternative D, investment in construction activities would generate one-time total wages of approximately \$174.5 million within the Counties (**Table 4.7-11**). Direct wages are estimated to total approximately \$116.4 million, while indirect and induced wages are estimated to total \$29.8 million and \$28.3 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the construction phase is considered a beneficial effect of Alternative D, similar to that of Alternative A.

Because Alternative D is located well within the borders of Sacramento County, and because Sacramento County is larger than San Joaquin County in terms of populations and economic activity, it is estimated that the majority of construction and operational jobs and wages described above will accrue to employees who reside in Sacramento County. This is also true for Alternatives E and F.

### ***Operation***

As calculated through IMPLAN, operation activities associated with Alternative D would generate an annual total of approximately 2,639 employment opportunities captured within the Counties (**Table 4.7-14**). Direct employment impacts are estimated to total approximately 1,870 job opportunities. Indirect and induced employment opportunities are estimated to total 370 and 399, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the local area.

Investment in operational activities associated with Alternative D would generate annual total wages of approximately \$129.1 million within the Counties (**Table 4.7-14**). Direct wages are estimated to total approximately \$85.7 million, of which approximately \$62.6 million would be attributed to the gaming and entertainment industry. Indirect and induced wages are estimated to total \$22.5 million and \$20.7 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the operation phase is considered a beneficial effect of Alternative D, similar to the beneficial effects of Alternative A.

### ***Summary of Employment Effects***

Construction and operation of Alternative D would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in the Counties. Given the projected unemployment rate, and the dynamics of the local labor market, the Counties are anticipated to be able to accommodate the increased demand for labor during the operation of Alternative A. This would result in employment and wages for persons previously unemployed,

increasing the ability of the population to provide themselves with health and safety services and contributing to the alleviation of poverty among lower income households. While employment opportunities at existing gaming facilities may temporarily be reduced proportional to the estimated substitution effect described previously, the net impact to employment opportunities as a result of the Alternative D would be positive. This is considered a beneficial similar to that of Alternative A.

## **Housing**

The 2019 housing market in the Counties as discussed under Alternative A would fulfill the demands for housing under Alternative D. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**. This impact would be comparable to that of Alternative A. Alternative D would not result in significant adverse effects to the housing market.

## **Social Effects**

Social impacts including pathological and problem gambling, and crime from Alternative D would be similar to those of Alternative A, since Alternative D is of the same size and scope. Adverse social impacts would not occur with the implementation of mitigation included in **Section 5.7**.

## **Community Effects**

### ***Schools***

Effects to schools would be similar to those described under Alternative A because Alternative D is of the same size and scope. This would be considered a less than significant impact. No mitigation is required.

### ***Libraries and Parks***

Effects to area libraries and parks could occur if the employees or patrons of Alternative D significantly increase the demand on these resources. Due to the limited number of employees expected to relocate due to Alternative D, as noted in the *Housing* section above, it is expected that these effects would be negligible. Additionally, due to the location of Alternative D, it is not anticipated that patrons would frequent local libraries or parks. Therefore, there would be a less than significant effect to libraries and parks. No mitigation is required.

## **Effects to the Wilton Rancheria Tribe**

The effects to the Tribe under Alternative D are similar to those described for Alternative A because Alternative D is of the same size and scope, but the projected revenue from Alternative D is substantially lower than that of Alternative A, resulting in fewer benefits to the Tribe.

## Environmental Justice: Minority and Low-Income Communities

No minority communities or low-income communities were identified through review of the demographics of Census tracts in the vicinity of the Historic Rancheria site (refer to **Section 3.7.3**). In addition, the Wilton Rancheria is been considered a minority community that would be impacted by Alternative D. Effects to the Wilton Rancheria would be positive and are discussed above. Therefore, Alternative D would not result in significant adverse effects to minority or low-income communities.

### 4.7.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE Economic Effects

The direct economic effects for both construction and operation of Alternative E are comparable to those described for Alternative B, but on a lesser scale than Alternative A since Alternative E is reduced in size and scope. However, note that the separate City of Galt analyses performed in **Section 4.7.1** are not applicable to Alternative D because the Historic Rancheria Site is not located in close proximity to the City of Galt.

#### **Construction**

Under Alternative E, construction and development activities are estimated to cost approximately \$232.4 million, which is expected to generate a one-time total output of approximately \$272.4 million within the Counties (**Table 4.7-1**). Direct output is estimated to total approximately \$176.3 million. Indirect and induced outputs are estimated to total \$45.0 million and \$51.1 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region.

Construction of Alternative E would generate substantial output to a variety of businesses the Counties in a variety of industries, including construction, manufacturing, professional services, and trade. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that is less than the beneficial impact of Alternative A.

#### **Operation**

Under build-out conditions in 2019, Alternative E is expected to generate an annual total output of approximately \$288.3 million within the Counties (**Table 4.7-3**). Direct output is estimated to total approximately \$191.1 million, of which approximately \$163.4 million would be attributed to the gaming and entertainment industry. Indirect and induced outputs are estimated to total \$47.1 million and \$50.1 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the local area.

Operation of Alternative E would generate increased revenues for a variety of businesses in the Counties as a result of increased economic activities. Output received by area businesses would in turn increase

their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that is less than the beneficial impact of Alternative A.

### ***Substitution Effects***

#### ***Existing Tribal Casino Gaming Market Substitution Effects***

Under Alternative E, a portion of revenue may be transferred from other local businesses through substitution. As noted under Alternative A, whenever a new casino opens in a market area, a certain amount of market substitution is to be expected. Alternative E is anticipated to cause a decline in gaming revenue to competing facilities; refer to **Table 4.7-5**. However, this loss of total revenue at competing tribal casinos is not anticipated to significantly impact these casinos, or to cause their closure, or to impact the ability of these tribal governments to provide essential services and facilities to their memberships. Estimated substitution effects are anticipated to diminish after the first year of the project's operation because local residents will have experienced the casino and will gradually return to more typical and more diverse spending patterns. Substitution effects also tend to diminish after the first full year of operations because, over time, growth in the total population and economic growth tend to increase the dollar value of demand for particular goods and services. Therefore, substitution effects resulting from Alternative E to competing gaming facility revenues would not impact the ability of these tribal governments to provide essential services and facilities to their memberships.

#### ***Licensed Cardroom Substitution Effects***

Substitution effects to licensed cardrooms are analyzed in the supplement to **Appendix H** provided in the Final EIS and discussed above for Alternative A in **Section 4.7.1**. Because Alternative E is smaller in scope than Alternative A, which has a less-than-significant effect, the substitution effects to licensed cardrooms under Alternative E also would be less than significant.

#### ***Non-Gaming Substitution Effects***

Similar to Alternative A, potential non-gaming substitution effects, should they occur, represent a negligible portion of total economic activity that would be generated by Alternative E. As discussed in **Section 4.7.1**, it is likely that the operation of the proposed casino will stimulate the local retail and restaurant business by drawing customers from outside the local area. This effect would offset any substitution effects to non-gaming businesses. Thus, as with Alternative A, it is not anticipated that significant non-gaming substitution effects would occur as a result of Alternative E.

### ***Fiscal Effects***

Alternative E would result in a variety of fiscal impacts that are similar to those described under Alternative D. As shown in **Table 3.7-8**, Alternative D would result in the loss of local property taxes, which would be more than offset by tax revenues generated for state and local governments from economic activity associated with construction and operation of Alternative D. Additionally, the 2011 MOU provides a framework for the Tribe to negotiate payments that could be made by the Tribe to the

State and local governments to provide support for public services, community benefits, and utilities (**Appendix B**).

For Alternative E, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, counties, and local governments. Construction would result in an estimated \$19.0 million in federal tax revenues, and \$10.7 million in state/county/local government tax revenues. Operation of Alternative E would result in an estimated \$22.9 million in federal tax revenues and \$10.0 million in state/county/local government tax revenues annually (**Table 4.7-8**). Actual annual tax revenues generated by the project may be greater than those indicated above as direct personal income tax is not accounted for in the operational tax revenue estimate.

In summary, the net impact to tax revenues as a result of Alternative E, would be similar to the effects of Alternative A, but smaller in scope. With the implementation of the mitigation measures outlined in **Section 5.7**, implementation of Alternative E would not result in adverse socioeconomic effects.

### ***Property Values***

Impacts to the values of properties in the vicinity of the project site would be similar to the impacts under Alternative D. However, because Alternative E is smaller in size compared to Alternative D, the resulting impacts on property values are likely to be smaller than those that would occur under Alternative D.

### ***Summary of Economic Effects***

Construction and operation of the Alternative E would generate substantial economic output for a variety of businesses in the County. Additionally, Alternative E would generate substantial tax revenues for state, county, and local governments. Overall, Alternative E, in combination with the implementation of the mitigation measures specified in **Section 5.7**, would result in a beneficial impact to the local economy that would be less beneficial than Alternative A.

### **Employment**

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages. The IMPLAN model was used to estimate employment opportunities generated by Alternative E.

### ***Construction***

Under Alternative E, investment in construction activities would generate a one-time total of approximately 1,745 employment positions within the Counties during the construction phase (**Table 4.7-11**). Indirect and induced employment opportunities are estimated to result in 293 and 374 employment opportunities, respectively.

Under Alternative E, investment in construction activities would generate one-time total wages of approximately \$108.2 million within the Counties (**Table 4.7-11**). Direct wages are estimated to total approximately \$72.4 million, while indirect and induced wages are estimated to total \$18.3 million and \$17.5 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the construction phase is considered a beneficial effect of Alternative E that is less than the beneficial effects of Alternative A.

### ***Operation***

As calculated through IMPLAN, operation activities associated with Alternative E would generate an annual total of approximately 2,095 employment opportunities captured within the Counties (**Table 4.7-14**). Direct employment impacts are estimated to total approximately 1,477 job opportunities. Indirect and induced employment opportunities are estimated to total 291 and 327, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the local area.

Investment in operational activities associated with Alternative E would generate annual total wages of approximately \$105.7 million within the Counties (**Table 4.7-14**). Direct wages are estimated to total approximately \$71.0 million, of which approximately \$55.5 million would be attributed to the gaming and entertainment industry. Indirect and induced wages are estimated to total \$17.7 million and \$17.0 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the operation phase is considered a beneficial effect of Alternative E that is less than the beneficial effects of Alternative A.

### ***Summary of Employment Effects***

Construction and operation of Alternative E would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in the Counties. Given the projected unemployment rate, and the dynamics of the local labor market, the Counties are anticipated to be able to accommodate the increased demand for labor during the operation of Alternative A. This would result in employment and wages for persons previously unemployed, increasing the ability of the population to provide themselves with health and safety services and contributing to the alleviation of poverty among lower income households. While employment opportunities at existing gaming facilities may temporarily be reduced proportional to the estimated substitution effect described previously, the net impact to employment opportunities as a result of the Alternative E would be positive. This is considered a beneficial effect that is less than the beneficial effects of Alternative A.

## **Housing**

The 2019 housing market in the Counties, as discussed under Alternative D, would fulfill the demands for housing under Alternative E. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**. This impact would be comparable, but to a lesser extent, than Alternative D. Alternative E would not result in significant adverse effects to the housing market.

## **Social Effects**

Social impacts including pathological and problem gambling, and crime from Alternative E would be comparable but to a lesser extent than Alternative A, since Alternative E is reduced in size and scope. Adverse social impacts would not occur with the implementation of mitigation included in **Section 5.7**.

## **Community Effects**

### ***Schools***

Effects to schools would be similar to, but less than those described under Alternatives A and D because Alternative E is reduced in size and scope. This would be considered a less than significant impact. No mitigation is required.

### ***Libraries and Parks***

Effects to libraries and parks would be similar to those described under Alternative D and, therefore, less than significant.

## **Effects to the Wilton Rancheria Tribe**

The effects to the Tribe under Alternative E are comparable to those described for Alternative A, but to a lesser scale since Alternative E is reduced in size and scope. Alternative E would not generate a sufficient amount of revenue to fund all essential governmental, social, and other services indicated in the Wilton Rancheria Unmet Needs Report (**Appendix A**).

## **Environmental Justice: Minority and Low-Income Communities**

No minority communities or low-income communities were identified through review of the demographics of Census tracts in the vicinity of the Historic Rancheria site (refer to **Section 3.7.3**). In addition, the Wilton Rancheria is considered a minority community that would be impacted by Alternative E. Effects to the Wilton Rancheria would be positive and are discussed above. Therefore, Alternative E would not result in significant adverse effects to minority or low-income communities.

## 4.7.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE

### Economic Effects

The direct economic effects for both construction and operation of Alternative F are similar to those described for Alternative A, since Alternative F is of the same size and scope.

#### **Construction**

Under Alternative F, construction and development activities are estimated to cost approximately \$319.0 million, which is expected to generate a one-time total output of approximately \$399.4 million within the Counties (**Table 4.7-1**). Direct output is estimated to total approximately \$259.4 million. Indirect and induced outputs are estimated to total \$66.1 million and \$73.9 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the area.

Construction of Alternative F would generate substantial output to a variety of businesses in the Counties. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that would be similarly beneficial to Alternative A.

#### **Operation**

Under build-out conditions in 2019, Alternative F is expected to generate an annual total output of approximately \$427.1 million within the Counties (**Table 4.7-3**). Direct output is estimated to total approximately \$288.2 million, of which approximately \$244.5 million would be attributed to the gaming and entertainment industry. Indirect and induced outputs are estimated to total \$71.5 million and \$67.5 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the local area.

Operation of Alternative F would generate increased revenues for a variety of businesses in the Counties as a result of increased economic activities. Output received by area businesses would in turn increase their spending, and labor demand, thereby further stimulating the local economy. This would be considered a beneficial impact that is similar to that of Alternative A.

#### **Substitution Effects**

##### *Existing Tribal Casino Gaming Market Substitution Effects*

Under Alternative F, a portion of revenue may be transferred from other local businesses through substitution. As noted under Alternative A, whenever a new casino opens in a market area, a certain amount of market substitution is to be expected. Alternative F is anticipated to cause a decline in gaming revenue to competing casino facilities (**Appendix U**); refer to **Table 4.7-5**. However, this loss of total revenue at competing tribal casinos is not anticipated to significantly impact these casinos, or to cause

their closure, or to impact the ability of these tribal governments to provide essential services and facilities to their memberships. Estimated substitution effects are anticipated to diminish after the first year of the project's operation because local residents will have experienced the casino and will gradually return to more typical and more diverse spending patterns. Substitution effects also tend to diminish after the first full year of operations because, over time, growth in the total population and economic growth tend to increase the dollar value of demand for particular goods and services. Therefore, substitution effects resulting from Alternative F to competing gaming facility revenues would not impact the ability of these tribal governments to provide essential services and facilities to their memberships.

#### *Licensed Cardroom Substitution Effects*

Substitution effects to licensed cardrooms are analyzed in the supplement to **Appendix H** provided in the Final EIS and discussed above for Alternative A in **Section 4.7.1**. Because Alternative F is equivalent in scope to Alternative A, the substitution effects to licensed cardrooms would be very similar to those for Alternative A, which are less than significant. Therefore, effects also would be less than significant under Alternative F.

#### *Non-Gaming Substitution Effects*

Similar to Alternative A, potential non-gaming substitution effects, should they occur, represent a negligible portion of total economic activity that would be generated by Alternative F. As discussed in **Section 4.7.1**, it is likely that the operation of the proposed casino will stimulate the local retail and restaurant business by drawing customers from outside the local area. This effect would offset any substitution effects to non-gaming businesses. Thus, as with Alternative A, it is not anticipated that significant non-gaming substitution effects would occur as a result of Alternative F.

#### *Fiscal Effects*

Alternative F would result in a variety of fiscal impacts. Similar to Alternative A, under Alternative F the Tribe would not pay corporate income taxes on revenue or property taxes on tribal trust land. In addition, Alternative F would increase demand for public services, resulting in increased costs for local governments to provide these services. Tax revenues would be generated for federal, state and local governments from the same activities discussed in Alternative A. Alternative F would involve taking the Mall site parcel into trust on behalf of the Tribe, which would result in the loss of approximately \$431,599 of property tax income for state, county, and local governments (**Table 3.7-9**). The 2016 Memorandum of Understanding (2016 MOU) provides for payments from the Tribe to Sacramento County to address fiscal effects (**Appendix B**). Additionally, the 2016 MOU between the Tribe and the City of Elk Grove contains provisions that require the Tribe to make payments to the City of Elk Grove to provide support for community facilities and public services (**Appendix B**).

For Alternative F, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, counties, and local governments.

Construction would result in an estimated \$27.6 million in federal tax revenues, and \$15.5 million in state/county/local government tax revenues. Operation of Alternative F would result in an estimated \$31.7 million in federal tax revenues and \$14.0 million in state/county/local government tax revenues annually (**Table 4.7-8**). As stated above, these amounts would be reduced by the estimated \$431,599 of lost property tax income from taking the Mall site parcels into trust. Actual annual tax revenues generated by the project may be greater than those indicated above as direct personal income tax is not accounted for in the operational tax revenue estimate.

In summary, the net impact to tax revenues as a result of Alternative F, would be similar to the effects of Alternative A, although the effects to the City of Galt described in Alternative A would instead accrue to the City of Elk Grove. Because the City of Elk Grove is larger than the City of Galt, the local city effects described in Alternative A would likely be larger under Alternative F. With the implementation of the mitigation measures outlined in **Section 5.7**, implementation of Alternative F would not result in adverse socioeconomic effects.

### ***Property Values***

Impacts to the values of properties in the vicinity of the project site would be similar to the impacts under Alternative A because the mix of current land uses is similar to those under Alternative A. In addition, it is likely that the area immediately adjacent to the Mall site will be developed in the not distant future, and such a development will be a mix of mostly commercial uses with some residential. This is similar to the likely future development mix in the vicinity of the Alternative A site. In addition, in its current partially developed state, the Mall site does not contribute positively to surrounding property values.

Consequently, the impact of Alternative F on surrounding property values is likely to be similar to, or slightly more positive than that of Alternative A, which is anticipated to be neutral.

### ***Summary of Economic Effects***

Construction and operation of the Alternative F would generate substantial economic output for a variety of businesses in the Counties. Additionally, Alternative F would generate substantial tax revenues for state, county, and local governments. Overall, Alternative F, in combination with the implementation of the mitigation measures outlined in **Section 5.7**, would result in a beneficial impact to the local economy that would be similar to that of Alternative A.

### **Employment**

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages. The IMPLAN model was used to estimate employment opportunities generated by Alternative F.

**Construction**

Under Alternative F, investment in construction activities would generate a one-time total of approximately 2,528 employment positions within the Counties during the construction phase (**Table 4.7-11**). Indirect and induced employment opportunities are estimated to result in 429 and 541 employment opportunities, respectively.

Under Alternative F, investment in construction activities would generate one-time total wages of approximately \$156.5 million within the Counties (**Table 4.7-11**). Direct wages are estimated to total approximately \$104.4 million, while indirect and induced wages are estimated to total \$26.7 million and \$25.4 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the construction phase is considered a beneficial effect of Alternative F, similar to that of Alternative A.

**Operation**

As calculated through IMPLAN, operation activities associated with Alternative F would generate an annual total of approximately 2,914 employment opportunities captured within the Counties (**Table 4.7-14**). Direct employment impacts are estimated to total approximately 2,031 job opportunities. Indirect and induced employment opportunities are estimated to total 442 and 440, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the local area.

Investment in operational activities associated with Alternative F would generate annual total wages of approximately \$142.5 million within the Counties (**Table 4.7-14**). Direct wages are estimated to total approximately \$92.7 million, of which approximately \$67.7 million would be attributed to the gaming and entertainment industry. Indirect and induced wages are estimated to total \$26.9 million and \$22.9 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the two-county region. The generation of employment and wages during the operation phase is considered a beneficial effect of Alternative F, similar to the beneficial effects of Alternative A.

**Summary of Employment Effects**

Construction and operation of Alternative F would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in the Counties. Given the projected unemployment rate, and the dynamics of the local labor market, the Counties are anticipated to be able to accommodate the increased demand for labor during the operation of Alternative A. This would result in employment and wages for persons previously unemployed, increasing the ability of the population to provide themselves with health and safety services and contributing to the alleviation of poverty among lower income households. While employment

opportunities at existing gaming facilities may temporarily be reduced proportional to the estimated substitution effect described previously, the net impact to employment opportunities as a result of the Alternative F would be positive. This is considered a beneficial similar to that of Alternative A.

## **Housing**

The 2019 housing market in the Counties as discussed under Alternative A would fulfill the demands for housing under Alternative F. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**. This impact would be comparable to that of Alternative A. Alternative F would not result in significant adverse effects to the housing market.

## **Social Effects**

Social impacts including pathological and problem gambling, and crime from Alternative F would be similar to those of Alternative A, since Alternative F is of the same size and scope. Mitigation is included in **Section 5.7** to ensure no adverse social impacts would occur. The 2016 MOUs between the Tribe and Sacramento County and the Tribe and the City of Elk Grove require the Tribe to make annual payments to each of these local governments to address social effects, especially regarding the potential for increased crime (**Appendix B**).

## **Community Effects**

### ***Schools***

Effects to schools would be similar to those described under Alternative A because Alternative F is of the same size and scope. This would be considered a less than significant impact. No mitigation is required. Furthermore, the 2016 MOU between the Tribe and the City of Elk Grove contains provisions for annual recurring payments from the Tribe to Elk Grove Unified School District (EGUSD) to reimburse EGUSD for lost tax revenues (**Appendix B**).

### ***Libraries and Parks***

Effects to area libraries and parks could occur if the employees or patrons of Alternative F significantly increase the demand on these resources. Due to the limited number of employees expected to relocate due to Alternative F as noted in the *Housing* section above, it is expected that these effects would be negligible. Additionally, due to the location of Alternative F, it is not anticipated that patrons would frequent local libraries or parks. Therefore, there would be a less than significant effect to libraries and parks. No mitigation is required.

### **Effects to the Wilton Rancheria Tribe**

The effects to the Tribe under Alternative F are similar to those described for Alternative A because Alternative F is of the same size and scope; however, the effects to the Tribe under Alternative C would be beneficial, but to a lesser scale than Alternative A because of the lower projected revenue.

### **Environmental Justice: Minority and Low-Income Communities**

The review of the demographics of census tracts in the vicinity of the Mall site (**Section 4.7.3**) showed that some areas contain a substantial minority community but none are low-income communities. The Wilton Rancheria is considered a minority community that would be impacted by Alternative F. Effects to the Tribe are positive in nature and discussed above; effects to other minority communities would be positive. Specifically, the increased economic development and opportunity for employment would positively affect other minority communities, and other effects, such as traffic, air quality, noise, etc. would be neutral, after the implementation of the specific mitigation measures related to these environmental effects. Therefore, with the implementation of the mitigation measures described in **Section 5.0**, Alternative F would not result in significant adverse effects to minority or low-income communities.

#### **4.7.7 ALTERNATIVE G – NO ACTION**

Under the No Action alternative, none of the six development alternatives (Alternatives A, B, C, D, E, and F) considered within the Environmental Impact Statement (EIS) would be implemented. The No Action alternative assumes that existing uses on Twin Cities site (Alternatives A, B, and C) would not change in the near term, nor would the Historic Rancheria site (Alternatives D and E). Since the owner of the Alternative F site (the Mall site) recently renewed development applications with the City of Elk Grove, it is likely that the site will be developed in the near-term with commercial/retail uses. Under Alternative G, the BIA would not take any actions in furtherance of its obligation to promote tribal self-determination and economic development related to the project alternatives. None of the potentially beneficial or adverse effects identified for Alternatives A through E would occur. Because the Mall site likely would be developed in the near-term, some of the impacts associated with Alternative F may occur under Alternative G. These effects and corresponding mitigation measures were documented in the Lent Ranch Marketplace Environmental Impact Report (City of Elk Grove, 2001) and were updated in a City Council Staff Report presented to the Elk Grove City Council on October 8, 2014 (City of Elk Grove, 2014).

## 4.8 TRANSPORTATION/CIRCULATION

This section identifies the direct effects to transportation and circulation that would result from the development of each alternative described in **Chapter 2.0**. Effects are measured against the environmental baseline presented in **Section 3.8**. Cumulative effects are identified in **Section 4.15**. Indirect effects associated with off-site construction and growth-inducement is identified in **Section 4.14**. Measures to avoid and, if necessary, mitigate for adverse effects are presented in **Section 5.8**.

### 4.8.1 ANALYSIS METHODOLOGY

The project would result in the addition of vehicle traffic to local intersections. A traffic impact analysis (TIA) was prepared for the project alternatives and is provided in **Appendix O**. This section incorporates the results of the study and any potential adverse effects to the transportation network.

#### Methodologies

##### *Trip Generation Rates*

##### *Casino Trip Generation (Alternatives A, B, D, E, and F)*

Trip generation for casinos can be based on one or more variables, but the gaming area or number of gaming positions is considered by traffic engineers to be the most reliable factor in determining the number of trips generated by a gaming facility. Trip generation rates calculated in this way include employees and patrons ancillary uses as well. Thus, separate calculations for the non-casino functions (excluding hotel and convention areas) are unnecessary.

The weekday (Thursday) P.M. and Saturday P.M. peak periods were chosen for evaluation, as they represent the times when the combination of background traffic and casino traffic are at their highest levels.

For the purposes of this study, daily rates were estimated based on an average P.M. peak hour/daily trip generation ratio and Saturday peak hour/daily trip generation ratio documented in published traffic studies for other comparable tribal casino projects in northern California. The final daily trip generation rates are consistent with the daily customer and employee totals projected for project alternatives (**Appendix O**<sup>1</sup>). The trip generation rates used for casino uses are summarized as follows:

Weekday Daily:	82.00 trips/1000 square feet gaming floor area
Weekday P.M. Peak Hour:	9.84 trips/1000 square feet gaming floor area

<sup>1</sup> Revisions to the Final EIS Alternative F site plan from the one presented in the Draft EIS do not change the trip generation calculations or other traffic-related analysis; therefore, **Appendix O** has not been revised from its Draft EIS versions. However, additional roadway segments were assessed for the Final EIS, the results of which is included in the Final EIS as a supplement to **Appendix O**.

Saturday Daily:	131.44 trips/1000 square feet gaming floor area
Saturday P.M. Peak Hour:	18.40 trips/1000 square feet gaming floor area

### *Hotel Trip Generation (Alternatives A, D, and F)*

Trip generation for the hotel use proposed as part of Alternatives A, D, and F was calculated based on data from the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 9th Edition. Because the vast majority of hotel guests will be casino patrons, the ITE hotel trip generation rate was reduced by three-quarters. This rate reduction is based on the traffic engineer's professional judgment and is consistent with the casino resort trip generation research and adjustments demonstrated in the traffic studies for other northern California gaming facilities, as well as the adjustments documented for on-site hotel uses at tribal gaming facilities in the San Diego Region (**Appendix O**).

### *Convention Center Trip Generation (Alternatives A, D, and F)*

Alternatives A, D, and F include a 47,000 square foot on-site convention facility with an estimated capacity of approximately 3,130 people (assuming an average density of 15 square feet per person). Using the same trip generation methodology utilized for other tribal gaming facilities in northern California, approximately 175 total vehicle trips would be expected to be generated by the on-site convention facility during the weekday and Saturday P.M. peak hours.

### *Retail/Commercial (Alternative C)*

ITE's Trip Generation Manual, 9th Edition was used to derive the trip generation estimates for the shopping center proposed in Alternative C.

### **Trip Reductions**

Certain types of land uses attract trips that are already on the adjacent road that stop as they pass by the site, or divert to the site from a nearby road. These are not new vehicle trips, but are considered to be pass-by trips or diverted link trips.

Pass-by trips represent trips already on the adjacent street which stop as they pass by the site as a matter of convenience on their path to another destination. These trips enter and exit the site at the driveways but are not new trips on the surrounding roadway network. Diverted link trips also are trips already on the road, but require a diversion from their current roadway to another roadway to access the site. Diverted link trips are common for retail- and entertainment-oriented developments located adjacent to highways or interstates. Like pass-by, diverted link trips are not new trips on the regional roadway network.

The location of the project site also influences the amount of pass-by and diverted link trips. If a project is located along a major roadway where drivers can conveniently turn from the roadway into a site driveway, then pass-by is generally greater and diverted link is lower. Conversely, if the project is

located in a somewhat isolated location without direct access to a major street, but within the vicinity of a major highway, then pass-by is often lower and diverted link is greater.

Because the existing volumes along West Stockton Boulevard adjacent to the proposed site access for Alternatives A, B, and C (less than 150 vehicles per day), no pass-by reductions were applied to these trip generation estimates.

Due to the proximity of the site to the State Route 99 (Hwy 99) freeway, which carries over 70,000 vehicles per day, a considerable proportion of the project trips are anticipated to be diverted link trips from the freeway. No empirical data were readily available at this time to establish specific pass-by rate/diverted link rates for casino uses; thus, a conservative estimate of 10% diverted link trips was assumed for casino alternatives at the Twin Cities Site and Mall Site in Elk Grove. A lesser estimate of 3% diverted link trips was assumed for the casino alternatives at the Historic Rancheria site, as this location is farther from Hwy 99 and would be expected to attract fewer diverted trips from the freeway. The assumed diverted link trip percentages are within 15% maximum reduction permitted for pass-by/diverted link trips per California Department of Transportation (Caltrans) guidance (**Appendix O**).

### *Pass-By and Diverted Link Trips for Retail Uses*

Each of the individual retail uses within the shopping center proposed in Alternative C will create a specific number of vehicle trips; however, many of the trips will already be on the adjacent roadways and will likely stop as they pass by the site as a matter of convenience. Due to the proximity of the site to the Hwy 99 freeway, which carries over 70,000 vehicles per day, a considerable proportion of the project trips are anticipated to be diverted link trips from the freeway. ITE's Trip Generation Handbook includes ranges of diverted link trips from a large sample of surveyed shopping center sites (ranging from 6% to 44%); however, average rates are not reported. To be conservative, the diverted link rate assumed for this trip generation analysis was set at 15%, consistent with Caltrans guidance.

Because the existing volumes along the street adjacent to the proposed site access for project Alternative C are relatively low, no pass-by reductions were applied to the trip generation estimates.

## **Significance Criteria**

### ***Level of Service (LOS) Standards***

*City of Galt:* Per the City of Galt General Plan - LOS E is considered the acceptable target for streets and intersections within a quarter-mile of State Routes. LOS D is the acceptable target for all other streets and intersections.

*City of Elk Grove:* Per the City of Elk Grove Traffic Impact Analysis Guidelines (2000), LOS D or better is considered the acceptable target for streets and intersections.

*County of Sacramento:* Per the General Plan, the County endeavors to plan and design the roadway system in a manner that meets LOS D on rural roadways and LOS E on urban roadways, unless it is infeasible to implement project alternatives or mitigation measures that would achieve LOS D on rural roadways or LOS E on urban roadways.

*Caltrans:* Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities, however, Caltrans acknowledges that this may not be always feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. For the purposes of this study, the LOS target for Caltrans facilities is:

- Consistent with Caltrans and City policies, a peak hour LOS D has been taken as the minimum standard for all State highway facilities, except for intersections and segments along SR 104, which will be analyzed with an LOS E acceptable operations threshold.
- The Transportation Corridor Concept Report for Route 104 (Caltrans, 2012) identifies the LOS for the segment of SR 104 within the City of Galt (Twin Cities Road from Hwy 99 to Marengo Road) as LOS F for existing conditions and a target of LOS E for the 20-year concept scenario. For the purposes of this project, the target LOS for SR 104 within the City of Galt is to maintain LOS E.

### ***Impact Criteria***

#### *Intersections*

An impact to a study intersection is considered significant, and mitigation measures must be identified when:

- Traffic generated by the project would cause a signalized intersection operating at acceptable LOS to degrade to an unacceptable level.
- Traffic generated by the project would cause an unsignalized intersection operating at acceptable LOS to degrade to an unacceptable level and/or also cause the intersection to satisfy a traffic signal warrant.
- The LOS at a signalized or unsignalized intersection without the project is unacceptable and the project generated traffic increases the average delay by more than five seconds and the volume-to-capacity (V/C) ratio by 0.05 or more.

#### *Roadway Segments*

An impact to a study roadway segment is considered significant, and mitigation measures must be identified when:

- Traffic generated by the project would cause a roadway segment operating at acceptable LOS to degrade to an unacceptable level.

- The LOS without the project is unacceptable and the project generated traffic increases the V/C ratio by 0.05 or more.

### *Freeway Facilities*

For freeway facilities, an impact is considered significant, and mitigation measures must be identified when:

- Traffic generated by the project would cause a facility operating at acceptable LOS to degrade to an unacceptable level.
- The LOS without the project is unacceptable and the project generated traffic increases density by more than five percent.

### *Bicycle Facilities*

The impact is significant if the project will:

- Inhibit bicycle use, or change the designation of the existing facility,
- Eliminate existing bicycle facilities, or
- Prevent the implementation of a proposed or planned bicycle facility.

### *Pedestrian Facilities*

The impact is significant if the project will:

- Inhibit pedestrian activity,
- Eliminate existing pedestrian facilities, or
- Prevent the implementation of a proposed or planned facility.

## **2018 Baseline Conditions**

The background and future forecast assumptions used for this traffic study were based on planned and approved short-term (2018, when the proposed development is expected to open) and long-term (2035 build-out year) changes to land use and transportation systems as identified in local and regional planning and programming documents and travel demand forecasting model projections, as well as information provided by the Cities of Galt and Elk Grove, County of Sacramento, Caltrans and the Sacramento Area Council of Governments (SACOG).

Projected traffic volumes for study facilities within the City of Galt were provided by the City and developed using the City of Galt Traffic Model, which reflects build out of the land uses within the City's sphere of influence through year 2035. For the purposes of developing 2018 baseline traffic forecasts, the year 2021 traffic forecasts provided by the City of Galt were compared to existing traffic volumes at

study facilities and adjusted to reflect only four years of growth from existing levels (2014 to 2018). See **Appendix O** for additional methodological information.

A modified version of SACOG's 2035 MTP/SCS travel demand forecasting model was used to develop traffic projections for weekday P.M. peak hour traffic volumes for study roadways outside of the City of Galt's sphere of influence. Model output was used to compare the base year (2008) with year 2035 model forecasts to determine the incremental difference in traffic volumes at study intersections and roadway facilities, and then applying a weighted amount of growth to the existing volumes to reflect only four years of growth (2014 to 2018).

Neither the City of Galt Traffic Model nor the SACOG travel demand model includes projections for Saturday traffic conditions. For the purposes of this study, Saturday volumes were calculated by determining the proportional difference between the existing weekday and Saturday volumes and applying that same proportion to the weekday P.M. peak hour model forecast volumes to obtain the projected Saturday volumes.

**Table 4.8-1** summarizes baseline traffic conditions during the P.M. peak hour at each of the study intersections without the addition of project-related traffic.

As shown in **Table 4.8-1**, the following study intersections are projected to operate at unacceptable levels of service for near-term (2018) conditions without Alternative A:

- Grant Line Road/East Stockton Boulevard (Weekday P.M.)

**Table 4.8-2** summarizes the conditions of the study roadway conditions in 2018 without the addition of any alternative.

As shown in **Table 4.8-2**, the following roadway segments operate at unacceptable levels of service for near-term conditions without Alternative A:

- Grant Line Road – East Stockton Boulevard to Waterman Road (Weekday)
- Grant Line Road – Waterman Road to Bradshaw Road (Weekday & Saturday)
- Grant Line Road – Bradshaw Road to Wilton Road (Weekday)
- Grant Line Road – Wilton Road to Calvine Road (Weekday)
- Grant Line Road – Calvine Road to Jackson Road (Weekday)

**Table 4.8-3** and **Table 4.8-4** summarizes the conditions of the freeway mainlines and ramps in 2018 without the addition of any alternative.

As shown in **Table 4.8-3** and **Table 4.8-4**, all study freeway mainlines and ramps are projected to operate at acceptable levels of service for near-term conditions without Alternative A.

**TABLE 4.8-1**  
2018 INTERSECTIONS WITHOUT PROJECT LOS

Intersection	Critical Approach/Movement <sup>1</sup>	LOS Target	P.M. Peak		Saturday Peak	
			LOS	Delay	LOS	Delay
West Stockton Blvd/Twin Cities Rd	-	D	B	13.0	A	9.3
East Stockton Blvd/Twin Cities Rd	-	D	B	12.5	A	5.7
Twin Cities Rd/Fermoy Way	-	D	B	16.7	B	11.5
Twin Cities Rd/Carillon Blvd	-	D	B	12.2	A	9.6
Twin Cities Rd/Marengo Rd	-	D	B	13.5	A	9.7
Twin Cities Rd/Cherokee Ln	NB	D	C	16.9	B	12.6
West Stockton Blvd/Hwy 99 SB Ramps (at Mingo Rd)	WB	D	A	8.7	A	8.6
East Stockton Blvd/Hwy 99 NB Ramps (at Mingo Rd)	NBT	D	A	9.2	A	9.1
Hwy 99 NB Ramps/Grant Line Rd	-	D	B	10.6	A	6.8
Hwy 99 SB Ramps/Grant Line Rd	-	D	A	6.3	A	6.6
Promenade Parkway/Kammerer Rd	-	D	C	23.1	B	19.7
Promenade Parkway/Bilby Rd	-	D	C	20.7	C	34.5
Grant Line Rd/East Stockton Blvd	-	D	<b>E</b>	<b>55.7</b>	C	28.2
Grant Line Rd/Bond Rd	-	D	C	22.9	B	19.2
Grant Line Rd/Sheldon Rd	-	D	B	19.8	B	11.4
Wilton Rd/Green Rd	-	D	B	11.1	A	8.8
Grant Line Rd/Wilton Rd	-	D	D	50.9	C	23.5
Wilton Rd/Dillard Rd	-	D	A	8.0	A	7.4
Wilton Rd/Cosumnes Rd	EB	D	C	15.4	B	11.9
Green Road/Project Driveway 1	-	-	-	-	-	-
Green Road/Project Driveway 2	-	-	-	-	-	-
Green Road/Project Driveway 3	-	-	-	-	-	-

<sup>1</sup> Delay represents worst minor street approach movement for side-street-stop-controlled (SSSC) intersections, average intersection delay for all-way-stop-controlled (AWSC), signalized intersections and roundabouts.  
 Note: Bold = unacceptable LOS  
 Source: **Appendix O** – Traffic Impact Study  
 Northbound (NB), Southbound (SB), Westbound (WB), Eastbound (EB)

**TABLE 4.8-2**  
2018 ROADWAYS WITHOUT PROJECT LOS

Roadway	Target LOS	Weekday		Saturday	
		ADT	LOS	ADT	LOS
Twin Cities Road (SR-104) – Fermoy Way to Marengo Rd	D	<b>23,185</b>	<b>F</b>	13,197	C
Twin Cities Road – West of Hwy 99	D	7,060	A	4,019	A
East Stockton Boulevard – Hwy 99 NB on-ramp to Mingo Rd	D	472	A	529	A
West Stockton Boulevard – Hwy 99 SB off-ramp to Hwy 99 SB ramps near Mingo Road	D	95	A	144	A
Promenade Parkway – Kammerer Rd to Bilby Rd	D	9,077	A	4,915	A
Promenade Parkway – Bilby Rd to Kyler Rd	D	7,596	A	4,113	A
Promenade Parkway – Kyler Rd to Whitelock Pkwy	D	6,871	A	3,721	A
Kammerer Road – Bruceville Rd to Lent Ranch Pkwy	D	11,214	D	9,670	D
Kammerer Road – Lent Ranch Parkway to Hwy 99	D	11,577	A	9,983	A
Grant Line Road – Hwy 99 to East Stockton Blvd/Survey Rd	D	25,007	A	19,129	A
Grant Line Road – East Stockton Blvd/Survey Rd to Waterman Rd	D	24,150	B	18,474	A
Grant Line Road – Waterman Rd to Bradshaw Rd	D	<b>22,059</b>	<b>F</b>	<b>16,874</b>	<b>E</b>
Grant Line Road – Bradshaw Rd to Wilton Rd	D	<b>18,200</b>	<b>F</b>	14,043	C
Grant Line Road – Wilton Rd to Calvine Rd	D	<b>19,655</b>	<b>F</b>	14,762	D
Grant Line Road – Calvine Rd to Jackson Rd	D	<b>18,580</b>	<b>F</b>	13,955	C
Dillard Road – Hwy 99 to Wilton Rd	D	4,741	C	3,633	C
Wilton Road – Grant Line Rd to Green Rd	D	9,965	D	8,321	D
Wilton Road – Green Rd to Dillard Rd	D	3,791	C	3,292	B
Green Road – Wilton Rd to Project Alternative D/E access road	D	4,129	C	3,754	C
Green Road – Project Alternative D/E access road to Dillard Rd	D	2,089	B	2,077	B
Note: ADT = average daily traffic, Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.					

**TABLE 4.8-3**  
2018 FREEWAY MAINLINES WITHOUT PROJECT LOS

Hwy 99 Segment	Target LOS	Weekday			Saturday		
		P.M. Peak Hour Volume	LOS	Density (pc/mi/ln)	P.M. Peak Hour Volume	LOS	Density (pc/mi/ln)
<b>Northbound</b>							
Between Ayers Lane and Walnut Avenue	D	3,169	D	29.6	2,241	C	20
Between Walnut Avenue and Twin Cities Road	D	2,897	D	26.4	2,240	C	20
Between Twin Cities Road and Mingo Road	D	2,990	D	27.4	2,267	C	20.3
Between Mingo Road and Arno Road	D	3,000	D	27.6	2,272	C	20.3
Between Arno Road and Dillard Road	D	3,025	D	27.8	2,291	C	20.5
Between Dillard Road and Grant Line Road	D	2,702	C	24.3	2,423	C	21.7
Between Grant Line Road and Elk Grove Boulevard	D	2,447	C	21.9	2,251	C	20.1
Between Elk Grove Boulevard and Bond Road <sup>1</sup>	D	2,464	C	22.1	2,204	C	19.7
<b>Southbound</b>							
Between Ayers Lane and Walnut Avenue	D	2,966	D	27.2	2,464	C	22.1
Between Walnut Avenue and Twin Cities Road	D	3,086	D	28.6	2,392	C	21.4
Between Twin Cities Road and Mingo Road	D	3,293	D	31.3	2,538	C	22.7
Between Mingo Road and Arno Road	D	3,298	D	31.3	2,543	C	22.8
Between Arno Road and Dillard Road	D	2,881	D	26.2	2,349	C	21
Between Dillard Road and Eschinger Road	D	2,786	C	25.2	2,415	C	21.6
Between Eschinger Road and Grant Line Road	D	2,715	C	24.5	2,361	C	21.1
Between Grant Line Road and Elk Grove Boulevard	D	2,367	C	21.2	2,235	C	20
Between Elk Grove Boulevard and Bond Road	D	2,623	C	23.5	1,597	B	14.3
Source: <b>Appendix O</b> – Traffic Impact Study.							

**TABLE 4.8-4**  
2018 FREEWAY RAMPS WITHOUT PROJECT LOS

Interchange Location	Target LOS	Weekday P.M. Peak Hour		Saturday Peak Hour	
		Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS
<b>Hwy 99 Ramps at Twin Cities Road</b>					
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	34.2	D	26.7	C
West Stockton Boulevard/Hwy 99 SB On-Ramp (north)	D	28.6	D	22.8	C
West Stockton Boulevard/Hwy 99 SB On-Ramp (south)	D	30.2	D	23.9	C
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	30.2	D	23.6	C
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	29.4	D	23.0	C
<b>Hwy 99 Ramps at Mingo Road</b>					
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	32.7	D	25.2	C
West Stockton Boulevard/Hwy 99 SB On-Ramp	D	34.4	D	27.6	C
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	29.8	D	22.6	C
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	31.7	D	25.1	C
<b>Hwy 99 Ramps at Grant Line Road</b>					
Hwy 99 NB Off-Ramp	D	<5	A	<5	A
Hwy 99 NB On-Ramp (WB Right)	D	18.9	B	17.3	B
Hwy 99 NB On-Ramp (EB Loop)	D	17.8	B	17.3	B
Hwy 99 SB Off-Ramp	D	<5	A	<5	A
Hwy 99 SB On-Ramp (WB Loop)	D	20.7	C	18.6	B
Hwy 99 SB On-Ramp (EB Right)	D	22.7	C	19.6	B
Source: <b>Appendix O</b> – Traffic Impact Study					

## 4.8.2 ALTERNATIVE A – TWIN CITIES CASINO RESORT

### Construction Traffic

There may be up to 400 worker and material haul trips per day during construction of Alternative A. Impacts resulting from the construction of Alternative A would be temporary in nature. It is anticipated that construction traffic may travel along Hwy 99, East Stockton Boulevard, and Mingo Road in the vicinity of the project site, but would primarily concentrate along West Stockton Boulevard. Highway 99 is an interregional route that operates as a major commuter and truck travel route. Mingo Road, East and West Stockton Boulevard are two-lane roads that are located in the vicinity of agricultural operations, and are regularly utilized by agricultural equipment and truck traffic. As these travel routes are frequented by agricultural and truck traffic and are not currently significantly degraded, it is not anticipated that construction traffic associated with Alternative A would have a significant effect on the roadway bed. However, mitigation is included in **Section 5.8** that would ensure that roadways subject to construction traffic are evaluated for road bed degradation and resurfaced as necessary.

Construction activity impacts would be concentrated on West Stockton Boulevard in the immediate vicinity of the site. Traffic-related construction impacts typically include traffic delays, one-way traffic control, temporary road closures, and traffic detours. The construction traffic impact would represent a temporary and less than significant inconvenience (**Appendix O**) to travelers on affected roadways and area residents. However, mitigation is included in **Section 5.8** that will further reduce construction impacts.

**Project Traffic**

**Trip Generation**

See **Section 4.8.1** for explanation of trip generation methodology. **Table 4.8-5** lists the land uses and resultant trip generation in both daily rates and peak hour rates. As seen in **Table 4.8-5**, Alternative A is expected to generate 11,083 new weekday trips, 2,055 new Saturday trips, 1,197 new trips in the weekday P.M. peak hour and 2,029 new trips in the Saturday P.M. peak hour. Only weekday and Saturday P.M. peak period traffic conditions were evaluated in this study because these periods represent the time periods where the project will contribute to the greatest amount of congestion and potential mitigation.

**TABLE 4.8-5**  
ALTERNATIVE A PEAK HOUR TRIP GENERATION

Land Use	ITE Code	Quantity (Units)	Weekday Daily	P.M. Peak Hour			Saturday Daily	Saturday Peak Hour		
				In	Out	Total		In	Out	Total
Casino	N/A	110,260 (SF GFA) <sup>1</sup>	9,041	510	575	1,085	14,493	954	1,075	2,029
<i>Trip Reductions (10%)</i>			(904)	(54)	(54)	(108)	(1,449)	(102)	(101)	(203)
Convention Area	N/A	3,130 (Seats)	2,330	140	35	175	2,330	140	35	175
Hotel	310	302(Rooms)	616	23	22	45	619	30	24	54
<b>Net New Vehicle Trips</b>			<b>11,083</b>	<b>619</b>	<b>578</b>	<b>1,197</b>	<b>15,993</b>	<b>1,022</b>	<b>1,033</b>	<b>2,055</b>

<sup>1</sup>SF GFA = square feet of gaming floor area; N/A – not applicable.  
Source: **Appendix O** – Traffic Impact Study.

**Trip Distribution**

Under Alternative A, most of the project-generated trips are anticipated to use Hwy 99 from Elk Grove and Sacramento to the north, and Lodi and Stockton to the south. It was estimated that approximately 58 percent of Alternative A traffic would come from destinations north of the site and approximately 23 percent of Alternative A traffic would come from destinations south of the site. Additionally, approximately 15 percent of Alternative A trips would come from destinations west of the site, 1 percent of Alternative A trips would come from areas east of Galt, and 3 percent of Alternative A trips would come from within the City of Galt.

## Traffic Conditions with Alternative A

To assess the impacts of the project on transportation facilities in the study area, the projected number of trips generated by Alternative A was added to baseline conditions (refer to **Section 4.8.1**). **Table 4.8-6** shows the P.M. and Saturday peak hour intersection delay and LOS at each of the study intersections under Alternative A, which consists of the baseline conditions plus the added trips that would result from Alternative A. The TIA contains additional information about Alternative A conditions, including turning movement volumes for each intersection (**Appendix O**).

As shown in **Table 4.8-6**, with the addition of Alternative A traffic, the following study intersections are projected to operate at an unacceptable LOS:

- West Stockton Boulevard/Twin Cities Road
- East Stockton Boulevard/Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Ramps (at Mingo Road)
- Grant Line Road/East Stockton Boulevard

**TABLE 4.8-6**  
ALTERNATIVE A INTERSECTION CONDITIONS

Intersection	Critical Approach/ Movement	LOS Target	P.M. Peak		Saturday Peak	
			LOS	Delay	LOS	Delay
West Stockton Blvd/Twin Cities Rd	-	D	<b>F</b>	<b>72.2</b>	D	49.0
East Stockton Blvd/Twin Cities Rd	-	D	<b>F</b>	<b>139.0</b>	<b>F</b>	<b>101.6</b>
Twin Cities Rd/Fermoy Way	-	D	B	16.7	B	11.5
Twin Cities Rd/Carillon Blvd	-	D	B	12.4	A	9.8
Twin Cities Rd/Marengo Rd	-	D	B	13.9	A	9.9
Twin Cities Rd/Cherokee Ln	NB	D	C	17.4	B	12.9
West Stockton Blvd/Hwy 99 SB Ramps (at Mingo Rd)	WB	D	C	27.6	<b>E</b>	<b>67.9</b>
East Stockton Blvd/Hwy 99 NB Ramps (at Mingo Rd)	NBT	D	A	9.2	A	9.1
Hwy 99 NB Ramps/Grant Line Rd	-	D	B	10.9	A	7.0
Hwy 99 SB Ramps/Grant Line Rd	-	D	A	6.2	A	6.4
Grant Line Rd/East Stockton Blvd	-	D	<b>E</b>	<b>56.6</b>	C	28.5
Grant Line Rd/Bond Rd	-	D	C	23.4	C	20.1
Grant Line Rd/Sheldon Rd	-	D	C	20.2	B	11.6
Grant Line Rd/Wilton Rd	-	D	D	52.1	C	24.2
Wilton Rd/Dillard Rd	-	D	A	8.1	A	7.6
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study						

Because the current Hwy 99/Mingo Road interchange configuration does not facilitate access between the east and west sides of the freeway, Alternative A traffic traveling to/from northbound Hwy 99 must use

the Twin Cities interchange and West Stockton Boulevard to access the site. This would add a considerable amount of additional traffic to the Twin Cities roundabouts, which would contribute to the congested conditions at these locations.

It should be noted that the intersection of Grant Line Road/East Stockton Boulevard is projected to operate at unacceptable LOS E with or without the addition of Alternative A. However, Alternative A would not increase the average control delay at the intersection by five seconds or more; thus, no significant impact would occur at this location.

**Table 4.8-7** summarizes the study roadway conditions under Alternative A.

**TABLE 4.8-7**  
ALTERNATIVE A ROADWAY CONDITIONS

Roadway	Target LOS	Weekday			Saturday		
		ADT	LOS	$\Delta V/C^1$	ADT	LOS	$\Delta V/C$
Twin Cities Road (SR-104) – Fermoy Way to Marengo Rd	D	<b>23,407</b>	<b>F</b>	+0.012	13,517	C	
Twin Cities Road –West of Hwy 99	D	8,722	A		6,418	A	
East Stockton Boulevard – Hwy 99 NB on-ramp to Mingo Rd	D	472	A		529	A	
West Stockton Boulevard – Hwy 99 SB off-ramp to Hwy 99 SB ramps near Mingo Road	D	6,521	A		9,416	A	
Promenade Parkway – Kammerer Rd to Bilby Rd	D	9,077	A		4,915	A	
Promenade Parkway – Bilby Rd to Kyler Rd	D	7,596	A		4,113	A	
Promenade Parkway – Kyler Rd to Whitelock Pkwy	D	6,871	A		3,721	A	
Kammerer Road – Bruceville Rd to Lent Ranch Pkwy	D	11,214	D		9,670	D	
Kammerer Road – Lent Ranch Parkway to Hwy 99	D	11,577	A		9,983	A	
Grant Line Road – Hwy 99 to East Stockton Blvd/Survey Rd	D	25,561	A		19,929	A	
Grant Line Road – East Stockton Blvd/Survey Rd to Waterman Rd	D	24,704	B		19,274	A	
Grant Line Road – Waterman Rd to Bradshaw Rd	D	<b>22,613</b>	<b>F</b>	<b>+0.031</b>	<b>17,674</b>	<b>E</b>	<b>+0.044</b>
Grant Line Road – Bradshaw Rd to Wilton Rd	D	<b>18,754</b>	<b>F</b>	<b>+0.031</b>	14,843	D	
Grant Line Road – Wilton Rd to Calvine Rd	D	<b>20,209</b>	<b>F</b>	<b>+0.031</b>	15,562	D	
Grant Line Road – Calvine Rd to Jackson Rd	D	<b>19,134</b>	<b>F</b>	<b>+0.031</b>	14,755	D	
Dillard Road – Hwy 99 to Wilton Rd	D	4,963	C		3,953	C	
Wilton Road – Grant Line Rd to Green Rd	D	9,965	D		8,321	D	
Wilton Road – Green Rd to Dillard Rd	D	3,791	C		3,292	B	
Green Road – Wilton Rd to Project Alternative D/E access road	D	4,129	C		3,754	C	
Green Road – Project Alternative D/E access road to Dillard Rd	D	2,089	B		2,077	B	

Note: Bold = unacceptable LOS  
<sup>1</sup> $\Delta V/C$  = change in volume to capacity ratio from 2018 baseline no project conditions  
 Source: **Appendix O** – Traffic Impact Study.

As shown in **Table 4.8-7**, four study roadway segments along Grant Line Road are projected to operate at unacceptable levels of service. However, as shown in **Table 4.8-2**, these roadway segments would operate at unacceptable levels of service with or without Alternative A. Additionally, Alternative A

would not result in an increase to the roadway segment V/C ratio of 0.05 or more; thus, no significant impact would occur at these roadway segments.

**Table 4.8-8** summarizes the study freeway mainline conditions with Alternative A.

**TABLE 4.8-8**  
ALTERNATIVE A FREEWAY MAINLINE CONDITIONS

Hwy 99 Segment	Target LOS	Weekday			Saturday		
		LOS	Density (pc/mi/ln)	Δ Density (%) <sup>1</sup>	LOS	Density (pc/mi/ln)	Δ Density (%)
<b>Northbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	31.5	6.4%	C	21.3	6.5%
Between Walnut Avenue and Twin Cities Road	D	D	28.2	6.8%	C	21.4	7.0%
Between Twin Cities Road and Mingo Road	D	D	31.7	15.7%	C	23.3	14.8%
Between Mingo Road and Arno Road	D	D	31.8	15.2%	C	23.4	15.3%
Between Arno Road and Dillard Road	D	D	32.2	15.8%	C	23.6	15.1%
Between Dillard Road and Grant Line Road	D	D	27.9	14.8%	C	24.8	14.3%
Between Grant Line Road and Elk Grove Boulevard	D	C	24.7	12.8%	C	22.8	13.4%
Between Elk Grove Boulevard and Bond Road <sup>1</sup>	D	C	23.6	6.8%	C	21.2	7.6%
<b>Southbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	28.7	5.5%	C	23.3	5.4%
Between Walnut Avenue and Twin Cities Road	D	D	30.4	6.3%	C	22.7	6.1%
Between Twin Cities Road and Mingo Road	D	D	33.4	6.7%	C	24.1	6.2%
Between Mingo Road and Arno Road	D	E	37.0	18.2%	D	26.4	15.8%
Between Arno Road and Dillard Road	D	D	30.5	16.4%	C	24.4	16.2%
Between Dillard Road and Eschinger Road	D	D	29.2	15.9%	C	24.9	15.3%
Between Eschinger Road and Grant Line Road	D	D	28.3	15.5%	C	24.4	15.6%
Between Grant Line Road and Elk Grove Boulevard	D	C	24.1	13.7%	C	22.8	14.0%
Between Elk Grove Boulevard and Bond Road	D	C	25.4	8.1%	B	15.9	11.2%
Note: Bold = unacceptable LOS <sup>1</sup> ΔDensity = change in density from 2018 baseline no project conditions Source: <b>Appendix O</b> – Traffic Impact Study							

As shown in **Table 4.8-8**, with the addition of Alternative A traffic, the following freeway mainline segment is projected to operate at an unacceptable LOS:

- Hwy 99 SB Between Mingo Road and Arno Road

**Table 4.8-9** summarizes the study freeway ramp conditions with Alternative A.

As shown in **Table 4.8-9**, with the addition of Alternative A traffic, the following freeway ramps are projected to operate at an unacceptable LOS:

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Mingo Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

**TABLE 4.8-9**  
ALTERNATIVE A FREEWAY RAMP CONDITIONS

Interchange Location	LOS Standards	Weekday P.M. Peak Hour			Saturday Peak Hour		
		Density (pc/mi/ln)	LOS	Δ Density (%)	Density (pc/mi/ln)	LOS	Δ Density (%)
<b>Hwy 99 Ramps at Twin Cities Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	<b>35.7</b>	<b>E</b>	<b>4%</b>	28.1	D	5.2%
West Stockton Boulevard/Hwy 99 SB On-Ramp (north)	D	29.9	D	4.5%	24.1	C	5.7%
West Stockton Boulevard/Hwy 99 SB On-Ramp (south)	D	31.5	D	4.3%	25.2	C	5.4%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.7	D	5.0%	25.2	C	6.8%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	32.1	D	9.2%	25.7	C	11.7%
<b>Hwy 99 Ramps at Mingo Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	<b>36.4</b>	<b>E</b>	<b>11.3%</b>	28.9	D	14.7%
West Stockton Boulevard/Hwy 99 SB On-Ramp	D	<b>35.6</b>	<b>E</b>	<b>3.5%</b>	28.7	D	4.0%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	33.2	D	11.4%	26.0	C	15.0%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	34.9	D	10.1%	<b>39.9</b>	<b>E</b>	<b>59.0%</b>
<b>Hwy 99 Ramps at Grant Line Road</b>							
Hwy 99 NB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 NB On-Ramp (WB Right)	D	21.6	C	14.3%	20.0	B	15.6%
Hwy 99 NB On-Ramp (EB Loop)	D	20.4	C	14.6%	19.9	B	15.0%
Hwy 99 SB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 SB On-Ramp (WB Loop)	D	23.3	C	12.6%	21.2	C	14.0%
Hwy 99 SB On-Ramp (EB Right)	D	25.9	C	14.1%	22.7	C	15.8%
Note: Bold = unacceptable LOS							
Source: <b>Appendix O</b> – Traffic Impact Study							

The increase in traffic generated by Alternative A would contribute to unacceptable traffic operations at the study locations outlined above. Without mitigation, these intersections would operate below acceptable LOS standards described in **Section 4.8.1**. Mitigation measures have been recommended within the TIA and included within **Section 5.8**. These mitigation measures include requirements to fund and/or construct key improvements to address traffic impacts related to Alternative A. With mitigation, these impacts would be reduced to a less than significant level. Additionally, the 2016 MOU with Sacramento County contains provisions requiring the Tribe to fund traffic impact mitigation on County roads.

## **Site Access**

Mitigation detailed in **Section 5.8** includes the reconstruction of the Hwy 99/Mingo Road interchange and closure of West Stockton Boulevard just north of the Hwy 99 SB hook ramps at Twin Cities Road. With implementation of mitigation in **Section 5.8**, access to the site would be provided by an extension of Mingo Road west of the proposed Hwy 99 SB ramps. With development of the proposed interchange, access will be available from Hwy 99 NB and SB, as well as locations east of Hwy 99 via Mingo Road. See **Figure 5-2** in **Section 5.8** for the proposed interchange design concept.

## **Roadway Conditions**

Alternative A is anticipated to add up to 2,700 vehicle trips per day to East Stockton Boulevard between Mingo Road and Twin Cities Road, where existing daily traffic volumes are very low (under 200 vehicles per day). As discussed in **Section 3.8.5**, the existing pavement condition index (PCI) for this roadway segment is 20, which represents very poor/deteriorated condition. Therefore, in its current condition, this roadway segment would not support traffic generated by Alternative A. Mitigation is included in **Section 5.8** to reconstruct the roadway to Sacramento County standards. The 2016 MOU with Sacramento County contains provisions requiring the Tribe to make annual payments for county road maintenance.

## **Transit, Bicycle, and Pedestrian Facilities**

The Twin Cities site is not expected to be served by transit routes with the implementation of the Alternative A; therefore, no significant impact to the existing transit services within the region would occur.

There are no sidewalks, trails or designated bicycle facilities within the vicinity of the Twin Cities site; thus, Alternative A would not inhibit access to or eliminate any existing facilities, nor would it prevent the implementation of any planned facilities.

### **4.8.3 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

#### **Construction Traffic**

The temporary traffic generated during construction of Alternative B would be similar but less than that associated with Alternative A; therefore, Alternative B would result in a less than significant effect to traffic and circulation during construction after mitigation (included in **Section 5.8**) is implemented.

#### **Project Traffic**

##### ***Trip Generation***

The projected vehicle trip generation resulting from Alternative B is shown in **Table 4.8-10**. Methodology used to determine trip generation and distribution is described above under **Section 4.8.2**.

**TABLE 4.8-10**  
ALTERNATIVE B PEAK HOUR TRIP GENERATION

Land Use	ITE Code	Quantity	Units	Weekday Daily	P.M. Peak Hour			Saturday Daily	Saturday Peak Hour		
					In	Out	Total		In	Out	Total
Casino	N/A	110,260	SF Gaming Floor Area	9,041	510	575	1,085	14,493	954	1,075	2,029
<i>Trip Reductions (10%)</i>				(904)	(54)	(54)	(108)	(1,449)	(102)	(101)	(203)
<b>Net New Vehicle Trips</b>				<b>8,137</b>	<b>456</b>	<b>521</b>	<b>977</b>	<b>13,044</b>	<b>852</b>	<b>974</b>	<b>1,826</b>
Source: <b>Appendix O</b> – Traffic Impact Study											

### ***Trip Distribution***

The trip distribution for Alternative B is the same as for Alternative A. Refer to **Section 4.8.2** and Figure 14 of **Appendix O**.

### **Traffic Conditions with Alternative B**

To assess the impacts of the project on transportation facilities in the study area, the projected number of trips generated by Alternative B was added to the baseline conditions (refer to **Section 4.8.1**).

**Table 4.8-11** shows the P.M. and Saturday peak hour intersection delay and LOS at each of the study intersections under Alternative B. Turning volumes at each of the study intersections under background plus Alternative B traffic conditions are provided within the TIA (**Appendix O**).

As shown in **Table 4.8-11**, with the addition of Alternative B traffic, the following study intersections are projected to operate at an unacceptable LOS:

- West Stockton Boulevard/Twin Cities Road
- East Stockton Boulevard/Twin Cities Road
- Grant Line Road/East Stockton Boulevard

It should be noted that the intersection of Grant Line Road/East Stockton Boulevard is projected to operate at unacceptable LOS E with or without the addition of Alternative B. However, Alternative B would not increase the average control delay at the intersection by five seconds or more; thus, no significant impact would occur at this location.

**Table 4.8-12** summarizes the study roadway conditions under Alternative B. Alternative B traffic will add traffic to several roadway segments that are projected to operate at deficient levels of service without the project; however, the project does not cause an increase in the roadway segment V/C ratio of 0.05 or more; thus, no significant impacts to roadway segments are identified.

**TABLE 4.8-11**  
ALTERNATIVE B INTERSECTION CONDITIONS

Intersection	Critical Approach/ Movement	LOS Target	P.M. Peak		Saturday Peak	
			LOS	Delay	LOS	Delay
West Stockton Blvd/Twin Cities Rd	-	D	<b>F</b>	<b>74.8</b>	<b>D</b>	<b>44.0</b>
East Stockton Blvd/Twin Cities Rd	-	D	<b>F</b>	<b>124.2</b>	<b>D</b>	<b>52.2</b>
Twin Cities Rd/Fermoy Way	-	D	B	16.7	B	11.5
Twin Cities Rd/Carillon Blvd	-	D	B	12.4	A	9.8
Twin Cities Rd/Marengo Rd	-	D	B	13.8	A	9.9
Twin Cities Rd/Cherokee Ln	NB	D	C	17.1	B	12.9
West Stockton Blvd/Hwy 99 SB Ramps (at Mingo Rd)	WB	D	C	21.7	D	48.0
East Stockton Blvd/Hwy 99 NB Ramps (at Mingo Rd)	NBT	D	A	9.2	A	9.1
Hwy 99 NB Ramps/Grant Line Rd	-	D	B	10.9	A	7.0
Hwy 99 SB Ramps/Grant Line Rd	-	D	A	6.2	A	6.4
Grant Line Rd/East Stockton Blvd	-	D	<b>E</b>	<b>56.3</b>	C	28.5
Grant Line Rd/Bond Rd	-	D	C	23.3	C	20.1
Grant Line Rd/Sheldon Rd	-	D	C	20.1	B	11.6
Grant Line Rd/Wilton Rd	-	D	D	51.9	C	24.2
Wilton Rd/Dillard Rd	-	D	A	8.1	A	7.6
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.						

**Table 4.8-13** and **Table 4.8-14** summarize the freeway segment and freeway ramp conditions under Alternative B.

As shown in **Table 4.8-13**, with the addition of Alternative B traffic, the following freeway mainline segment is projected to operate at an unacceptable LOS:

- Hwy 99 SB Between Mingo Road and Arno Road

As shown in **Table 4.8-14**, with the addition of Alternative B traffic, the following freeway ramps are projected to operate at an unacceptable LOS:

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

**TABLE 4.8-12**  
ALTERNATIVE B ROADWAY CONDITIONS

Roadway	Target LOS	Weekday			Saturday		
		ADT	LOS	ΔV/C	ADT	LOS	ΔV/C
Twin Cities Road (SR-104) – Fermoy Way to Marengo Rd	D	<b>23,348</b>	F	+0.009	13,458	C	
Twin Cities Road –West of Hwy 99	D	8,281	A		5,976	A	
East Stockton Boulevard – Hwy 99 NB on-ramp to Mingo Rd	D	472	A		529	A	
West Stockton Boulevard – Hwy 99 SB off-ramp to Hwy 99 SB ramps near Mingo Road	D	4,813	A		7,707	A	
Promenade Parkway – Kammerer Rd to Bilby Rd	D	9,077	A		4,915	A	
Promenade Parkway – Bilby Rd to Kyler Rd	D	7,596	A		4,113	A	
Promenade Parkway – Kyler Rd to Whitelock Pkwy	D	6,871	A		3,721	A	
Kammerer Road – Bruceville Rd to Lent Ranch Pkwy	D	11,214	D		9,670	D	
Kammerer Road – Lent Ranch Parkway to Hwy 99	D	11,577	A		9,983	A	
Grant Line Road – Hwy 99 to East Stockton Blvd/Survey Rd	D	25,414	A		19,781	A	
Grant Line Road – East Stockton Blvd/Survey Rd to Waterman Rd	D	24,557	B		19,126	A	
Grant Line Road – Waterman Rd to Bradshaw Rd	D	<b>22,466</b>	F	<b>+0.023</b>	<b>17,526</b>	E	<b>+0.036</b>
Grant Line Road – Bradshaw Rd to Wilton Rd	D	<b>18,607</b>	F	<b>+0.023</b>	14,695	D	
Grant Line Road – Wilton Rd to Calvine Rd	D	<b>20,062</b>	F	<b>+0.023</b>	15,414	D	
Grant Line Road – Calvine Rd to Jackson Rd	D	<b>18,987</b>	F	<b>+0.023</b>	14,607	D	
Dillard Road – Hwy 99 to Wilton Rd	D	4,904	C		3,894	C	
Wilton Road – Grant Line Rd to Green Rd	D	9,965	D		8,321	D	
Wilton Road – Green Rd to Dillard Rd	D	3,791	C		3,292	B	
Green Road – Wilton Rd to Project Alternative D/E access road	D	4,129	C		3,754	C	
Green Road – Project Alternative D/E access road to Dillard Rd	D	2,089	B		2,077	B	
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.							

Like under Alternative A, traffic under Alternative B will add to the background congestion of the freeway mainline and ramps. There are mainline segment and ramp locations that will operate at unacceptable LOS as a result of the project, or will operate at unacceptable LOS without the project and experience an increase in density of more than five percent with the addition of the project. Significant congestion is expected with or without the project.

**TABLE 4.8-13**  
ALTERNATIVE B FREEWAY MAINLINE CONDITIONS

Hwy 99 Segment	Target LOS	Weekday			Saturday		
		LOS	Density (pc/mi/ln)	Δ Density (%) <sup>1</sup>	LOS	Density (pc/mi/ln)	Δ Density (%)
<b>Northbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	31.0	4.7%	C	21.0	5.0%
Between Walnut Avenue and Twin Cities Road	D	D	27.7	4.9%	C	21.1	5.7%
Between Twin Cities Road and Mingo Road	D	D	31.2	13.9%	C	23.0	13.3%
Between Mingo Road and Arno Road	D	D	31.4	13.8%	C	23.1	13.8%
Between Arno Road and Dillard Road	D	D	31.8	14.4%	C	23.3	13.7%
Between Dillard Road and Grant Line Road	D	D	27.5	13.2%	C	24.5	12.9%
Between Grant Line Road and Elk Grove Boulevard	D	C	24.4	11.4%	C	22.5	11.9%
Between Elk Grove Boulevard and Bond Road	D	C	23.5	6.3%	C	21.1	7.1%
<b>Southbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	28.6	5.1%	C	23.2	5.0%
Between Walnut Avenue and Twin Cities Road	D	D	30.2	5.6%	C	22.6	5.6%
Between Twin Cities Road and Mingo Road	D	D	33.2	6.1%	C	24.0	5.7%
Between Mingo Road and Arno Road	D	E	35.3	12.8%	C	25.4	11.4%
Between Arno Road and Dillard Road	D	D	29.3	11.8%	C	23.5	11.9%
Between Dillard Road and Eschinger Road	D	D	28.0	11.1%	C	24.0	11.1%
Between Eschinger Road and Grant Line Road	D	D	27.2	11.0%	C	23.5	11.4%
Between Grant Line Road and Elk Grove Boulevard	D	C	23.3	9.9%	C	22.1	10.5%
Between Elk Grove Boulevard and Bond Road	D	C	24.9	6.0%	B	15.5	8.4%
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.							

The increase in traffic generated by Alternative B would contribute to unacceptable traffic operations at the study intersections outlined above. Without mitigation, these intersections would operate below acceptable LOS standards described in **Section 4.8.1**. Mitigation measures have been recommended within the TIA and included within **Section 5.8**. Upon implementation of recommended mitigation, Alternative B would have a less than significant effect associated with traffic and circulation.

**TABLE 4.8-14**  
ALTERNATIVE B FREEWAY RAMP CONDITIONS

Interchange Location	Target LOS	Weekday P.M. Peak Hour			Saturday Peak Hour		
		Density (pc/mi/ln)	LOS	Δ Density (%)	Density (pc/mi/ln)	LOS	Δ Density (%)
<b>Hwy 99 Ramps at Twin Cities Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	35.5	E	4%	28.0	C	4.9%
West Stockton Boulevard/Hwy 99 SB On-Ramp (north)	D	29.7	D	3.8%	24.0	C	5.3%
West Stockton Boulevard/Hwy 99 SB On-Ramp (south)	D	31.4	D	4.0%	25.1	C	5.0%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.4	D	4.0%	24.8	C	5.1%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	31.8	D	8.2%	25.4	C	10.4%
<b>Hwy 99 Ramps at Mingo Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	35.5	D	8.6%	27.9	C	10.7%
West Stockton Boulevard/Hwy 99 SB On-Ramp	D	35.5	E	3.2%	28.6	D	3.6%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	32.9	D	10.4%	25.6	C	13.3%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	34.5	D	8.8%	39.6	E	57.8%
<b>Hwy 99 Ramps at Grant Line Road</b>							
Hwy 99 NB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 NB On-Ramp (WB Right)	D	21.3	C	12.7%	19.7	B	13.9%
Hwy 99 NB On-Ramp (EB Loop)	D	20.4	C	14.6%	19.9	C	15.0%
Hwy 99 SB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 SB On-Ramp (WB Loop)	D	23.3	C	12.6%	21.2	C	14.0%
Hwy 99 SB On-Ramp (EB Right)	D	25.0	C	10.1%	21.8	C	11.2%
Note: Bold = unacceptable LOS							
Source: <b>Appendix O</b> – Traffic Impact Study.							

### Site Access

Access to the Twin Cities site under Alternative B would be the same as under Alternative A. Refer to **Section 4.8.2**.

### Roadway Conditions

Alternative B is anticipated to add up to 2,300 vehicle trips per day to East Stockton Boulevard between Mingo Road and Twin Cities Road, where existing daily traffic volumes are very low (under 200 vehicles per day). Impacts to roadway conditions would be similar to those under Alternative A and mitigation is included in **Section 5.8** to reconstruct this roadway segment to Sacramento County standards.

### Transit, Bicycle, and Pedestrian Facilities

The Twin Cities site is not served by any fixed route transit service; therefore, no significant impact to transit service will occur as a result of Alternative B.

There are no sidewalks, trails or designated bicycle facilities within the vicinity of the Twin Cities site; thus, Alternative B would not inhibit access to or eliminate any existing facilities, nor would it prevent the implementation of any planned facilities.

**4.8.4 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

**Construction Traffic**

Construction impacts would be similar to those identified under Alternative A in **Section 4.8.2**. Impacts would be temporary and less than significant. Mitigation is included in **Section 5.8** to further reduce the potential for impacts.

**Project Traffic**

**Trip Generation**

The projected vehicle trip generation resulting from Alternative C is shown in **Table 4.8-15**. The ITE Manual was used to determine each project component’s trip generation rate.

**TABLE 4.8-15**  
ALTERNATIVE C PEAK HOUR TRIP GENERATION

Land Use	ITE Code	Quantity	Units	Weekday Daily	P.M. Peak Hour			Saturday Daily	Saturday Peak Hour		
					In	Out	Total		In	Out	Total
Retail	820	686,000	sf	23,744	1,067	1,110	2,177	31,084	1,590	1,467	3,057
<i>Trip Reductions (15%)</i>				(3,562)	(164)	(163)	(327)	(4,663)	(230)	(229)	(459)
<b>Net New Vehicle Trips</b>				<b>20,182</b>	<b>903</b>	<b>947</b>	<b>1,850</b>	<b>26,421</b>	<b>1,360</b>	<b>1,238</b>	<b>2,598</b>

Source: **Appendix O** – Traffic Impact Study.

**Trip Reduction**

For Shopping Center land use (ITE 820), ITE's Trip Generation Handbook, 2nd Edition identifies a P.M. peak hour pass-by rate of 22% for a shopping center of the proposed size and a range of diverted link rates are provided for shopping center sites, varying from 6% to 44%. Because the average traffic volumes for streets adjacent to the Twin Cities site are very low, no pass-by reductions are applied to the trip generation estimates. The site is located adjacent to Hwy 99, which carries over 70,000 vehicles per day. For the purposes of this analysis, the base daily and peak hour trip generation estimates are adjusted based on an average diverted link rate of 15%, as shown above in **Table 4.8-15**. This adjustment is likely conservative and is consistent with Caltrans' guidance for pass-by/diverted link trip reductions (Caltrans Guide for the Preparation of Traffic Impact Studies, 2002).

**Trip Distribution**

Under Alternative C, the majority of trips associated with the retail center would come from north (22 percent) or south (39 percent) along Hwy 99. Refer to Figure 34 of **Appendix O**.

## Traffic Conditions with Alternative C

**Table 4.8-16** shows the P.M. and Saturday peak hour intersection delay and LOS at each of the study intersections under Alternative C. Turning volumes at each of the study intersections under baseline plus Alternative C traffic conditions are provided within the TIA (**Appendix O**).

**TABLE 4.8-16**  
ALTERNATIVE C INTERSECTION CONDITIONS

Intersection	Critical Approach/ Movement	LOS Target	P.M. Peak		Saturday Peak	
			LOS	Delay	LOS	Delay
West Stockton Blvd/Twin Cities Rd	-	D	<b>F</b>	<b>97.9</b>	<b>E</b>	<b>65.5</b>
East Stockton Blvd/Twin Cities Rd	-	D	<b>F</b>	<b>271.4</b>	<b>F</b>	<b>359.7</b>
Twin Cities Rd/Fermoy Way	-	D	B	18.4	B	12.2
Twin Cities Rd/Carillon Blvd	-	D	C	21.1	B	19.1
Twin Cities Rd/Marengo Rd	-	D	C	20.8	B	13.5
Twin Cities Rd/Cherokee Ln	NB	D	C	22.4	C	16.5
West Stockton Blvd/Hwy 99 SB Ramps (at Mingo Rd)	WB	D	<b>F</b>	<b>104.8</b>	<b>F</b>	<b>351.9</b>
East Stockton Blvd/Hwy 99 NB Ramps (at Mingo Rd)	NBT	D	A	9.2	A	9.1
Hwy 99 NB Ramps/Grant Line Rd	-	D	B	10.6	A	6.8
Hwy 99 SB Ramps/Grant Line Rd	-	D	A	6.3	A	6.6
Grant Line Rd/East Stockton Blvd	-	D	<b>E</b>	<b>55.7</b>	C	28.2
Grant Line Rd/Bond Rd	-	D	C	22.9	B	19.2
Grant Line Rd/Sheldon Rd	-	D	B	19.8	B	11.4
Grant Line Rd/Wilton Rd	-	D	D	50.9	C	23.5
Wilton Rd/Dillard Rd	-	D	A	8.0	A	7.4
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.						

As shown in **Table 4.8-16**, with the addition of Alternative C traffic, the following study intersections are projected to operate at an unacceptable LOS:

- West Stockton Boulevard/Twin Cities Road
- East Stockton Boulevard/Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Ramps (at Mingo Road)
- Grant Line Road/East Stockton Boulevard

It should be noted that the intersection of Grant Line Road/East Stockton Boulevard is projected to operate at unacceptable LOS E with or without the addition of Alternative C. However, Alternative C would not increase the average control delay at the intersection by five seconds or more; thus, no significant impact would occur at this location.

**Table 4.8-17** summarizes the conditions of the study roadway conditions under Alternative C. As shown in **Table 4.8-17**, with the addition of Alternative C traffic, the following study intersections are projected to operate at an unacceptable LOS:

**TABLE 4.8-17**  
ALTERNATIVE C ROADWAY CONDITIONS

Segment Extents	Target LOS	Weekday			Saturday		
		ADT	LOS	ΔV/C	ADT	LOS	ΔV/C
Twin Cities Road (SR-104) – Fermoy Way to Marengo Rd	D	<b>29,038</b>	<b>F</b>	<b>+0.325</b>	<b>20,859</b>	<b>F</b>	<b>+0.426</b>
Twin Cities Road –West of Hwy 99	D	8,675	A		6,133	A	
East Stockton Boulevard – Hwy 99 NB on-ramp to Mingo Rd	D	472	A		529	A	
West Stockton Boulevard – Hwy 99 SB off-ramp to Hwy 99 SB ramps near Mingo Road	D	14,021	C		<b>18,374</b>	<b>F</b>	<b>+1.013</b>
Promenade Parkway – Kammerer Rd to Bilby Rd	D	9,077	A		4,915	A	
Promenade Parkway – Bilby Rd to Kyler Rd	D	7,596	A		4,113	A	
Promenade Parkway – Kyler Rd to Whitelock Pkwy	D	6,871	A		3,721	A	
Kammerer Road – Bruceville Rd to Lent Ranch Pkwy	D	11,214	D		9,670	D	
Kammerer Road – Lent Ranch Parkway to Hwy 99	D	11,577	A		9,983	A	
Grant Line Road – Hwy 99 to East Stockton Blvd/Survey Rd	D	25,209	A		19,393	A	
Grant Line Road – East Stockton Blvd/Survey Rd to Waterman Rd	D	24,352	B		18,738	A	
Grant Line Road – Waterman Rd to Bradshaw Rd	D	<b>22,261</b>	<b>F</b>	<b>+0.011</b>	<b>17,138</b>	<b>E</b>	<b>+0.015</b>
Grant Line Road – Bradshaw Rd to Wilton Rd	D	<b>18,402</b>	<b>F</b>	<b>+0.011</b>	14,307	C	
Grant Line Road – Wilton Rd to Calvine Rd	D	<b>19,857</b>	<b>F</b>	<b>+0.011</b>	15,026	D	
Grant Line Road – Calvine Rd to Jackson Rd	D	<b>18,782</b>	<b>F</b>	<b>+0.011</b>	14,219	C	
Dillard Road – Hwy 99 to Wilton Rd	D	4,741	C		3,633	C	
Wilton Road – Grant Line Rd to Green Rd	D	9,965	D		8,321	D	
Wilton Road – Green Rd to Dillard Rd	D	3,791	C		3,292	B	
Green Road – Wilton Rd to Project Alternative D/E access road	D	4,129	C		3,754	C	
Green Road – Project Alternative D/E access road to Dillard Rd	D	2,089	B		2,077	B	
Note: Bold = unacceptable LOS							
Source: <b>Appendix O</b> – Traffic Impact Study.							

- Twin Cities Road (SR 104) – Fermoy Way to Marengo Road
- West Stockton Boulevard – Hwy 99 SB Off-Ramp (north of Twin Cities Road) to Hwy 99 SB Ramps (at Mingo Road)

It should be noted that there are additional locations along Grant Line Road where the project adds additional traffic to roadway segments that are projected to operate at unacceptable levels of service without the project; however, the V/C ratio increases by less than 0.05; thus, no significant impact is identified.

Table 4.8-18 and Table 4.8-19 summarize the freeway segment and freeway ramp conditions under Alternative C.

**TABLE 4.8-18**  
ALTERNATIVE C FREEWAY MAINLINE CONDITIONS

Hwy 99 Segment	Target LOS	Weekday			Saturday		
		LOS	Density (pc/mi/ln)	Δ Density (%) <sup>1</sup>	LOS	Density (pc/mi/ln)	Δ Density (%)
<b>Northbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	34.2	15.5%	C	23.0	15.0%
Between Walnut Avenue and Twin Cities Road	D	D	30.7	16.3%	C	23.2	16.0%
Between Twin Cities Road and Mingo Road	D	D	30.0	9.5%	C	22.1	8.9%
Between Mingo Road and Arno Road	D	D	30.1	9.1%	C	22.2	9.4%
Between Arno Road and Dillard Road	D	D	30.5	9.7%	C	22.4	9.3%
Between Dillard Road and Grant Line Road	D	D	26.5	9.1%	C	23.6	8.8%
Between Grant Line Road and Elk Grove Boulevard	D	C	23.9	9.1%	C	22.0	9.5%
Between Elk Grove Boulevard and Bond Road	D	C	23.2	5.0%	C	20.8	5.6%
<b>Southbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	31.5	15.8%	C	25.4	14.9%
Between Walnut Avenue and Twin Cities Road	D	D	33.3	16.4%	C	24.7	15.4%
Between Twin Cities Road and Mingo Road	D	E	37.1	18.5%	D	26.5	16.7%
Between Mingo Road and Arno Road	D	D	34.3	9.6%	C	24.7	8.3%
Between Arno Road and Dillard Road	D	D	28.5	8.8%	C	22.8	8.6%
Between Dillard Road and Eschinger Road	D	D	27.4	8.7%	C	23.5	8.8%
Between Eschinger Road and Grant Line Road	D	D	26.6	8.6%	C	22.9	8.5%
Between Grant Line Road and Elk Grove Boulevard	D	C	23.0	8.5%	C	21.8	9.0%
Between Elk Grove Boulevard and Bond Road	D	C	24.9	6.0%	B	15.5	8.4%
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study							

As shown in **Table 4.8-18**, with the addition of Alternative C traffic, the following freeway mainline segment is projected to operate at an unacceptable LOS:

- Hwy 99 SB Between Twin Cities Road and Mingo Road

As shown in **Table 4.8-19**, with the addition of Alternative C traffic, the following freeway ramps are projected to operate at an unacceptable LOS:

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road

- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

**TABLE 4.8-19**  
ALTERNATIVE C FREEWAY RAMP CONDITIONS

Interchange Location	Target LOS	Weekday P.M. Peak Hour			Saturday Peak Hour		
		Density (pc/mi/ln)	LOS	Δ Density (%)	Density (pc/mi/ln)	LOS	Δ Density (%)
<b>Hwy 99 Ramps at Twin Cities Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	37.9	E	11%	30.4	D	13.9%
West Stockton Boulevard/Hwy 99 SB On-Ramp (north)	D	31.9	D	11.5%	26.2	C	14.9%
West Stockton Boulevard/Hwy 99 SB On-Ramp (south)	D	33.5	D	10.9%	27.3	C	14.2%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	33.7	D	11.6%	27.2	C	15.3%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	31.1	D	5.8%	24.7	C	7.4%
<b>Hwy 99 Ramps at Mingo Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	34.8	D	6.4%	27.3	C	8.3%
West Stockton Boulevard/Hwy 99 SB On-Ramp	D	37.4	E	8.7%	30.6	D	10.9%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.9	D	7.0%	24.7	C	9.3%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	33.6	D	6.0%	38.8	E	54.6%
<b>Hwy 99 Ramps at Grant Line Road</b>							
Hwy 99 NB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 NB On-Ramp (WB Right)	D	20.8	C	10.1%	19.2	B	11.0%
Hwy 99 NB On-Ramp (EB Loop)	D	20.4	C	14.6%	19.9	C	15.0%
Hwy 99 SB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 SB On-Ramp (WB Loop)	D	23.3	C	12.6%	21.2	C	14.0%
Hwy 99 SB On-Ramp (EB Right)	D	24.5	C	7.9%	21.3	C	8.7%
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.							

Like under Alternative A, traffic under Alternative C will add to the background congestion of the freeway mainline and ramps. There are mainline segment and ramp locations that would operate at unacceptable LOS as a result of the Alternative C, or would operate at unacceptable LOS without the project and experience an increase in density of more than five percent with the addition of the project. Significant congestion is expected with or without the project.

The increase in traffic generated by Alternative C would contribute to unacceptable traffic operations at the study intersections outlined above. Without mitigation, these intersections would operate below acceptable LOS standards described in **Section 4.8.1**. Mitigation measures have been recommended within the TIA and included within **Section 5.8**. Upon implementation of recommended mitigation, Alternative C would have a less than significant effect associated with traffic and circulation.

## Site Access

Access to the Twin Cities site under Alternative C would be the same as Alternative A. Refer to **Section 4.8.2**.

## Roadway Conditions

Alternative C is anticipated to add up to 10,000 vehicle trips per day to East Stockton Boulevard between Mingo Road and Twin Cities Road, where existing daily traffic volumes are very low (under 200 vehicles per day). Impacts to roadway conditions would be similar to those under Alternative A and mitigation is included in **Section 5.8** to reconstruct this roadway segment to Sacramento County standards.

## Transit, Bicycle, and Pedestrian Facilities

The Twin Cities site is not served by any fixed route transit service; therefore, no significant impact to transit service will occur as a result of Alternative C.

There are no sidewalks, trails or designated bicycle facilities within the vicinity of the Twin Cities site; thus, Alternative C would not inhibit access to or eliminate any existing facilities, nor would it prevent the implementation of any planned facilities.

### 4.8.5 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE

#### Construction Traffic

There may be up to 400 worker and material haul trips per day during construction of Alternative D. Impacts resulting from the construction of Alternative D would be temporary in nature. It is not anticipated that construction traffic associated with Alternative D would have a significant effect on the roadway bed. However, mitigation is included in **Section 5.8** that would ensure that roadways subject to construction traffic are evaluated for road bed degradation and resurfaced as necessary.

Construction activity impacts would be concentrated on Green Road in the immediate vicinity of the site. Traffic-related construction impacts typically experienced may include traffic delays, one-way traffic control, temporary road closures, and traffic detours. The construction traffic impact would represent a temporary and less than significant inconvenience to travelers on affected roadways and area residents; however, mitigation is included in **Section 5.8** to further reduce construction impacts.

#### Project Traffic

##### *Trip Generation*

The projected vehicle trip generation resulting from Alternative D is shown in **Table 4.8-20**. Methodology used to determine trip generation and distribution is described above under **Section 4.8.1**.

**TABLE 4.8-20**  
ALTERNATIVE D PEAK HOUR TRIP GENERATION

Land Use	ITE Code	Quantity	Units	Weekday Daily	P.M. Peak Hour			Saturday Daily	Saturday Peak Hour		
					In	Out	Total		In	Out	Total
Casino	N/A	110,260	SF Gaming Floor Area	9,041	510	575	1,085	14,493	954	1,075	2,029
<i>Trip Reductions (3%)</i>				(271)	(17)	(16)	(33)	(435)	(31)	(30)	(61)
Convention Area	N/A	3,130	Seats	2,330	140	35	175	2,330	140	35	175
Hotel	310	302	Rooms	616	23	22	45	619	30	24	54
<b>Net New Vehicle Trips</b>				<b>11,716</b>	<b>656</b>	<b>616</b>	<b>1,272</b>	<b>17,007</b>	<b>1,093</b>	<b>1,104</b>	<b>2,197</b>
Source: <b>Appendix O</b> – Traffic Impact Study.											

**Trip Distribution**

Under Alternative D, it was estimated that approximately 51 percent of Alternative D traffic would come from destinations north of the site and approximately 19 percent of Alternative D traffic would come from destinations south of the site. Additionally, approximately 13.5 percent of Alternative D trips would come from I-5 and destinations west of the site, and approximately 15 percent of Alternative D trips would come from within the City of Elk Grove. Refer to Figure 42 of **Appendix O**.

**Traffic Conditions with Alternative D**

To assess the impacts of the project on transportation facilities in the study area, the projected number of trips generated by Alternative D was added to baseline conditions (refer to **Section 4.8.1**). **Table 4.8-21** shows the P.M. and Saturday peak hour intersection delay and LOS at each of the study intersections under Alternative D. Turning volumes at each of the study intersections under baseline plus Alternative D traffic conditions are provided within the TIA (**Appendix O**).

As shown in **Table 4.8-21**, with the addition of Alternative D traffic, the following study intersections are projected to operate at an unacceptable LOS:

- Grant Line Road/East Stockton Boulevard
- Grant Line Road/Bond Road
- Wilton Road/Green Road
- Grant Line Road/Wilton Road
- Wilton Road/Cosumnes Road
- Green Road/Project Driveway 1
- Green Road/Project Driveway 2

**TABLE 4.8-21**  
ALTERNATIVE D INTERSECTION CONDITIONS

Intersection	Critical Approach/ Movement	LOS Target	P.M. Peak		Saturday Peak	
			LOS	Delay	LOS	Delay
Hwy 99 NB Ramps/Grant Line Rd	-	D	B	10.9	A	7.3
Hwy 99 SB Ramps/Grant Line Rd	-	D	A	7.5	A	8.1
Promenade Parkway/Kammerer Rd	-	D	C	23.2	C	20.4
Promenade Parkway/Bilby Rd	-	D	C	20.7	C	34.5
Grant Line Rd/E. Stockton Blvd	-	D	<b>E</b>	<b>61.1</b>	C	32.8
Grant Line Rd/Bond Rd	-	D	<b>E</b>	<b>70.2</b>	<b>E</b>	<b>57.1</b>
Grant Line Rd/Sheldon Rd	-	D	C	24.9	B	14.3
Wilton Rd/Green Rd	-	D	<b>F</b>	<b>206.4</b>	<b>F</b>	<b>401.8</b>
Grant Line Rd/Wilton Rd	-	D	<b>F</b>	<b>227.4</b>	<b>F</b>	<b>356.3</b>
Wilton Rd/Dillard Rd	-	D	A	9.7	B	10.2
Wilton Rd/Cosumnes Rd	EB	D	<b>F</b>	<b>155.2</b>	<b>F</b>	<b>298.8</b>
Green Road/Project Driveway 1	-	D	C	23.3	<b>F</b>	<b>713.3</b>
Green Road/Project Driveway 2	-	D	D	31.0	<b>F</b>	<b>92.2</b>
Green Road/Project Driveway 3	-	D	A	9.7	B	10.3
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.						

**Table 4.8-22** summarizes the conditions of the study roadway conditions under Alternative D.

As shown in **Table 4.8-22**, the following roadways would operate at unacceptable levels with the addition of Alternative D traffic:

- Twin Cities Road – Fermoy Way to Marengo Road
- Grant Line Road – Waterman Road to Bradshaw Road
- Grant Line Road – Bradshaw Road to Wilton Road
- Grant Line Road – Wilton Road to Calvin Road
- Grant Line Road – Calvin Road to Jackson Road
- Wilton Road – Grant Line Road to Green Road
- Green Road – Wilton Road to project access driveways

It should be noted that the segment of Twin Cities Road from Fermoy Way to Marengo Road is projected to operate at unacceptable LOS F with or without the addition of Alternative D. However, Alternative D would not cause an increase in the roadway segment V/C ratio of 0.05 or more; thus, no significant impact would occur at this location.

**TABLE 4.8-22**  
ALTERNATIVE D ROADWAY CONDITIONS

Roadway	Target LOS	Weekday			Saturday		
		ADT	LOS	$\Delta V/C^1$	ADT	LOS	$\Delta V/C$
Twin Cities Road (SR-104) – Fermoy Way to Marengo Rd	D	<b>23,185</b>	F	<b>+0</b>	13,197	C	
Twin Cities Road – West of Hwy 99	D	7,060	A		4,019	A	
East Stockton Boulevard – Hwy 99 NB on-ramp to Mingo Rd	D	472	A		529	A	
West Stockton Boulevard – Hwy 99 SB off-ramp to Hwy 99 SB ramps near Mingo Road	D	95	A		144	A	
Promenade Parkway – Kammerer Rd to Bilby Rd	D	9,077	A		4,915	A	
Promenade Parkway – Bilby Rd to Kyler Rd	D	7,596	A		4,113	A	
Promenade Parkway – Kyler Rd to Whitelock Pkwy	D	6,871	A		3,721	A	
Kammerer Road – Bruceville Rd to Lent Ranch Pkwy	D	12,710	D		11,829	D	
Kammerer Road – Lent Ranch Parkway to Hwy 99	D	13,073	A		12,142	A	
Grant Line Road – Hwy 99 to East Stockton Blvd/Survey Rd	D	28,221	A		23,767	A	
Grant Line Road – East Stockton Blvd/Survey Rd to Waterman Rd	D	27,963	C		23,976	B	
Grant Line Road – Waterman Rd to Bradshaw Rd	D	<b>26,603</b>	F	<b>+0.252</b>	<b>23,431</b>	F	<b>+0.364</b>
Grant Line Road – Bradshaw Rd to Wilton Rd	D	<b>25,049</b>	F	<b>+0.381</b>	<b>23,927</b>	F	<b>+0.549</b>
Grant Line Road – Wilton Rd to Calvine Rd	D	<b>21,495</b>	F	<b>+0.102</b>	<b>17,417</b>	E	<b>+0.148</b>
Grant Line Road – Calvine Rd to Jackson Rd	D	<b>19,688</b>	F	<b>+0.062</b>	15,554	D	
Dillard Road – Hwy 99 to Wilton Rd	D	6,847	D		6,672	D	
Wilton Road – Grant Line Rd to Green Rd	D	<b>18,665</b>	E	<b>+0.38</b>	<b>20,876</b>	E	<b>+0.548</b>
Wilton Road – Green Rd to Dillard Rd	D	5,897	C		6,331	D	
Green Road – Wilton Rd to Project Alternative D/E access road	D	<b>14,990</b>	E	<b>+0.639</b>	<b>19,427</b>	F	<b>+0.922</b>
Green Road – Project Alternative D/E access road to Dillard Rd	D	2,311	B		2,397	B	

Note: Bold = unacceptable LOS  
<sup>1</sup> $\Delta V/C$  = change in volume to capacity ratio from 2018 baseline no project conditions  
Source: **Appendix O** – Traffic Impact Study

**Table 4.8-23** and **Table 4.8-24** summarize the freeway segment and freeway ramp conditions under Alternative D. As shown in **Table 4.8-23**, with the addition of Alternative D traffic, no freeway mainlines will operate at an unacceptable LOS.

As shown in **Table 4.8-24**, with the addition of Alternative D traffic, the following freeway ramps are projected to operate at an unacceptable LOS:

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

**TABLE 4.8-23**  
ALTERNATIVE D FREEWAY MAINLINE CONDITIONS

Hwy 99 Segment	Target LOS	Weekday			Saturday		
		LOS	Density (pc/mi/ln)	Δ Density (%) <sup>1</sup>	LOS	Density (pc/mi/ln)	Δ Density (%)
<b>Northbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	31.2	5.4%	C	21.1	5.5%
Between Walnut Avenue and Twin Cities Road	D	D	27.8	5.3%	C	21.2	6.0%
Between Twin Cities Road and Mingo Road	D	D	28.9	5.5%	C	21.4	5.4%
Between Mingo Road and Arno Road	D	D	29.1	5.4%	C	21.4	5.4%
Between Arno Road and Dillard Road	D	D	29.4	5.8%	C	21.6	5.4%
Between Dillard Road and Grant Line Road	D	C	24.3	0.0%	C	21.7	0.0%
Between Grant Line Road and Elk Grove Boulevard	D	C	22.8	4.1%	C	21.0	4.5%
Between Elk Grove Boulevard and Bond Road <sup>1</sup>	D	C	23.3	5.4%	C	20.9	6.1%
<b>Southbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	28.5	4.8%	C	23.1	4.5%
Between Walnut Avenue and Twin Cities Road	D	D	30.1	5.2%	C	22.5	5.1%
Between Twin Cities Road and Mingo Road	D	D	33.0	5.4%	C	23.9	5.3%
Between Mingo Road and Arno Road	D	D	33.0	5.4%	C	23.9	4.8%
Between Arno Road and Dillard Road	D	D	27.5	5.0%	C	22.1	5.2%
Between Dillard Road and Eschinger Road	D	C	25.6	1.6%	C	21.9	1.4%
Between Eschinger Road and Grant Line Road	D	C	24.8	1.2%	C	21.4	1.4%
Between Grant Line Road and Elk Grove Boulevard	D	C	22.1	4.2%	C	20.9	4.5%
Between Elk Grove Boulevard and Bond Road	D	C	25.0	6.4%	B	15.6	9.1%
<sup>1</sup> ΔDensity = change in density from 2018 baseline no project conditions Source: <b>Appendix O</b> – Traffic Impact Study.							

Alternative D traffic would add to the background congestion of the freeway mainline and ramps. There are mainline segment and ramp locations that would operate at unacceptable LOS as a result of the project, or would operate at unacceptable LOS without the project and experience an increase in density of more than five percent with the addition of the project. Significant congestion is expected with or without the project.

The increase in traffic generated by Alternative D would contribute to unacceptable traffic operations at the study intersections outlined above. Without mitigation, these intersections would operate below acceptable LOS standards described in **Section 4.8.1**. Mitigation measures have been recommended within the TIA and included within **Section 5.8**. Upon implementation of recommended mitigation, Alternative D would have a less than significant effect associated with traffic and circulation.

**TABLE 4.8-24**  
ALTERNATIVE D FREEWAY RAMP CONDITIONS

Interchange Location	Target LOS	Weekday P.M. Peak Hour			Saturday Peak Hour		
		Density (pc/mi/ln)	LOS	Δ Density (%)	Density (pc/mi/ln)	LOS	Δ Density (%)
<b>Hwy 99 Ramps at Twin Cities Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	35.4	E	4%	27.8	C	4.1%
West Stockton Boulevard/Hwy 99 SB On-Ramp (north)	D	29.6	D	3.5%	23.9	C	4.8%
West Stockton Boulevard/Hwy 99 SB On-Ramp (south)	D	31.3	D	3.6%	25.0	C	4.6%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.2	D	3.3%	24.9	C	5.5%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	30.5	D	3.7%	24.1	C	4.8%
<b>Hwy 99 Ramps at Mingo Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	33.9	D	3.7%	26.4	C	4.8%
West Stockton Boulevard/Hwy 99 SB On-Ramp	D	35.5	E	3.2%	28.6	D	3.6%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.9	D	7.0%	23.9	C	5.8%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	32.9	D	3.8%	38.0	E	51.4%
<b>Hwy 99 Ramps at Grant Line Road</b>							
Hwy 99 NB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 NB On-Ramp (WB Right)	D	19.7	B	4.2%	18.0	B	4.0%
Hwy 99 NB On-Ramp (EB Loop)	D	20.4	C	14.6%	19.9	C	15.0%
Hwy 99 SB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 SB On-Ramp (WB Loop)	D	23.3	C	12.6%	21.2	C	14.0%
Hwy 99 SB On-Ramp (EB Right)	D	23.0	C	1.3%	19.9	B	1.5%
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study							

**Site Access**

Access to the Historic Rancheria Site would be provided from three new site access driveways off of Green Road just east of Wilton Road and southeast of the Grant Line Road and the Elk Grove city limit.

For the purposes of this analysis, the site access driveways are assumed to initially have side-street stop-control and single lane ingress and egress. Traffic accessing the site from Hwy 99 is anticipated to exit at Grant Line Road and continue east to Wilton Road before turning onto Green Road.

**Roadway Conditions**

Alternative D is anticipated to add up to 3,000 vehicle trips per day to Dillard Road between SR-99 and Wilton Road, which represents about a 70 percent increase over the projected no-project traffic volumes along this segment. As discussed in **Section 3.8.5**, the existing PCI for this roadway ranges from 61-97, which represents fair condition; however, there are currently no shoulders along a significant portion of this roadway segment. Alternative D is anticipated to add about 3,100 new daily trips to Wilton Road

between Green Road and Dillard Road, which represents about an 80 percent increase over the projected no-project traffic volumes along this segment. As discussed in **Section 3.8.5**, the existing PCI for this roadway ranges from 20-83, which represents very poor/deteriorated condition to fair condition. Additionally, there are currently no shoulders along this roadway segment. Therefore, in their current conditions, these roadway segments would not support traffic generated by Alternative D. Mitigation is included in **Section 5.8** to reconstruct the roadways to Sacramento County standards.

Alternative D is anticipated to add a significant amount of new trips to Green Road from Wilton Road to the central project access driveway. As discussed in **Section 3.8.5**, the existing PCI for Green Road from Wilton Road to Dillard ranges from 20-83, which represents very poor/deteriorated condition to fair condition. As discussed within **Section 4.8.5** under *Traffic Conditions with Alternative D*, Green Road would operate at an unacceptable LOS with the addition of Alternative D traffic and mitigation is included in **Section 5.8** that would widen Green Road from Wilton Road to the project access driveway. With mitigation, this roadway segment would be improved to support traffic generated by Alternative D.

### **Transit, Bicycle, and Pedestrian Facilities**

The Twin Cities site is not served by any fixed route transit service; therefore, no significant impact to transit service will occur as a result of Alternative D.

There are few to no sidewalks, trails or designated bicycle facilities within the vicinity of Historic Rancheria site; thus, Alternative D would not inhibit access to or eliminate any existing facilities, nor would the project prevent the implementation of any planned facilities.

### **4.8.6 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

#### **Construction Traffic**

The temporary traffic generated during construction of Alternative E would be similar but less than that associated with Alternative A; therefore, Alternative E would result in a less than significant effect to traffic and circulation during construction.

#### **Project Traffic**

##### ***Trip Generation***

The projected vehicle trip generation resulting from Alternative E is shown in **Table 4.8-25**. Methodology used to determine trip generation and distribution is described above under **Section 4.8.1**.

##### ***Trip Distribution***

The trip distribution for Alternative E is the same as for Alternative D. Refer to Figure 42 of **Appendix O**.

**TABLE 4.8-25**  
ALTERNATIVE E PEAK HOUR TRIP GENERATION

Land Use	ITE Code	Quantity	Units	Weekday Daily	P.M. Peak Hour			Saturday Daily	Saturday Peak Hour		
					In	Out	Total		In	Out	Total
Casino	N/A	110,260	SF Gaming Floor Area	9,041	510	575	1,085	14,493	954	1,075	2,029
<i>Trip Reductions (3%)</i>				(271)	(17)	(16)	(33)	(435)	(31)	(30)	(61)
<b>Net New Vehicle Trips</b>				<b>8,770</b>	<b>493</b>	<b>559</b>	<b>1,052</b>	<b>14,058</b>	<b>923</b>	<b>1,045</b>	<b>1,968</b>

Source: **Appendix O** – Traffic Impact Study.

### Traffic Conditions with Alternative E

To assess the impacts of the project on transportation facilities in the study area, the projected number of trips generated by Alternative E was added to baseline conditions (refer to **Section 4.8.1**).

**Table 4.8-26** shows the P.M. and Saturday peak hour intersection delay and LOS at each of the study intersections under Alternative E. Turning volumes at each of the study intersections under baseline plus Alternative E traffic conditions are provided within the TIA (**Appendix O**).

**TABLE 4.8-26**  
ALTERNATIVE E INTERSECTION CONDITIONS

Intersection	Critical Approach/Movement	LOS Target	P.M. Peak		Saturday Peak	
			LOS	Delay	LOS	Delay
Hwy 99 NB Ramps/Grant Line Rd	-	D	B	10.8	A	7.1
Hwy 99 SB Ramps/Grant Line Rd	-	D	A	7.3	A	7.9
Promenade Parkway/Kammerer Rd	-	D	C	23.1	C	20.4
Promenade Parkway/Bilby Rd	-	D	C	20.7	C	34.5
Grant Line Rd/East Stockton Blvd	-	D	<b>E</b>	<b>60.8</b>	C	32.3
Grant Line Rd/Bond Rd	-	D	D	47.2	D	40.1
Grant Line Rd/Sheldon Rd	-	D	C	23.1	B	14.0
Wilton Rd/Green Rd	-	D	<b>F</b>	<b>145.3</b>	<b>F</b>	<b>341.3</b>
Grant Line Rd/Wilton Rd	-	D	<b>F</b>	<b>188.8</b>	<b>F</b>	<b>314.0</b>
Wilton Rd/Dillard Rd	-	D	A	9.2	A	9.6
Wilton Rd/Cosumnes Rd	EB	D	<b>F</b>	<b>86.1</b>	<b>F</b>	<b>179.4</b>
Green Road/Project Driveway 1	-	D	C	18.6	<b>F</b>	<b>403.5</b>
Green Road/Project Driveway 2	-	D	C	23.0	<b>F</b>	<b>59.2</b>
Green Road/Project Driveway 3	-	D	A	9.6	B	10.2

Note: Bold = unacceptable LOS  
Source: **Appendix O** – Traffic Impact Study.

As shown in **Table 4.8-26**, with the addition of Alternative E traffic, the following study intersections are projected to operate at an unacceptable LOS:

- Grant Line Road/East Stockton Boulevard
- Wilton Road/Green Road
- Grant Line Road/Wilton Road
- Wilton Road/Cosumnes Road
- Green Road/Project Driveway 1
- Green Road/Project Driveway 2

Table 4.8-27 summarizes the conditions of the study roadway conditions under Alternative E.

**TABLE 4.8-27**  
ALTERNATIVE E ROADWAY CONDITIONS

Roadway	Target LOS	Weekday			Saturday		
		ADT	LOS	$\Delta V/C^1$	ADT	LOS	$\Delta V/C$
Twin Cities Road (SR-104) – Fermoy Way to Marengo Rd	D	<b>23,185</b>	F	<b>+0</b>	13,197	C	
Twin Cities Road –West of Hwy 99	D	7,060	A		4,019	A	
East Stockton Boulevard – Hwy 99 NB on-ramp to Mingo Rd	D	472	A		529	A	
West Stockton Boulevard – Hwy 99 SB off-ramp to Hwy 99 SB ramps near Mingo Road	D	95	A		144	A	
Promenade Parkway – Kammerer Rd to Bilby Rd	D	9,077	A		4,915	A	
Promenade Parkway – Bilby Rd to Kyler Rd	D	7,596	A		4,113	A	
Promenade Parkway – Kyler Rd to Whitelock Pkwy	D	6,871	A		3,721	A	
Kammerer Road – Bruceville Rd to Lent Ranch Pkwy	D	12,312	D		11,431	D	
Kammerer Road – Lent Ranch Parkway to Hwy 99	D	12,675	A		11,744	A	
Grant Line Road – Hwy 99 to East Stockton Blvd/Survey Rd	D	27,367	A		22,912	A	
Grant Line Road – East Stockton Blvd/Survey Rd to Waterman Rd	D	26,949	C		22,961	B	
Grant Line Road – Waterman Rd to Bradshaw Rd	D	<b>25,395</b>	F	<b>+0.185</b>	<b>22,222</b>	F	<b>+0.297</b>
Grant Line Road – Bradshaw Rd to Wilton Rd	D	<b>23,229</b>	F	<b>+0.279</b>	<b>22,104</b>	F	<b>+0.448</b>
Grant Line Road – Wilton Rd to Calvine Rd	D	<b>21,006</b>	F	<b>+0.075</b>	<b>16,927</b>	E	<b>+0.12</b>
Grant Line Road – Calvine Rd to Jackson Rd	D	<b>19,394</b>	F	<b>+0.045</b>	15,259	D	
Dillard Road – Hwy 99 to Wilton Rd	D	6,287	D		6,111	D	
Wilton Road – Grant Line Rd to Green Rd	D	<b>16,353</b>	E	<b>+0.279</b>	<b>18,561</b>	E	<b>+0.447</b>
Wilton Road – Green Rd to Dillard Rd	D	5,337	C		5,770	C	
Green Road – Wilton Rd to Project Alternative D/E access road	D	<b>12,103</b>	E	<b>+0.469</b>	<b>16,537</b>	E	<b>+0.752</b>
Green Road – Project Alternative D/E access road to Dillard Rd	D	2,252	B		2,338	B	
Note: Bold = unacceptable LOS <sup>1</sup> $\Delta V/C$ = change in volume to capacity ratio from 2018 baseline no project conditions Source: <b>Appendix O</b> – Traffic Impact Study							

As shown in **Table 4.8-27**, the following roadways would operate at unacceptable levels with the addition of Alternative E traffic:

- Twin Cities Road – Fermoy Way to Marengo Road

- Grant Line Road – Waterman Road to Bradshaw Road
- Grant Line Road – Bradshaw Road to Wilton Road
- Grant Line Road – Wilton Road to Calvine Road
- Grant Line Road – Calvine Road to Jackson Road
- Wilton Road – Grant Line Road to Green Road
- Green Road – Wilton Road to project access driveways

It should be noted that the segment of Twin Cities Road from Fermoy Way to Marengo Road and Grant Lane Road from Calvine Road to Jackson Road are projected to operate at unacceptable LOS F with or without the addition of Alternative E. However, Alternative E would not cause increases in the roadway segment V/C ratio of 0.05 or more; thus, no significant impact would occur at these roadway segments.

Table 4.8-28 and Table 4.8-29 summarize the freeway segment and freeway ramp conditions under Alternative E.

**TABLE 4.8-28**  
ALTERNATIVE E FREEWAY MAINLINE CONDITIONS

Hwy 99 Segment	Target LOS	Weekday			Saturday		
		LOS	Density (pc/mi/ln)	Δ Density (%) <sup>1</sup>	LOS	Density (pc/mi/ln)	Δ Density (%)
<b>Northbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	30.8	4.1%	C	20.8	4.0%
Between Walnut Avenue and Twin Cities Road	D	D	27.4	3.8%	C	20.9	4.5%
Between Twin Cities Road and Mingo Road	D	D	28.5	4.0%	C	21.1	3.9%
Between Mingo Road and Arno Road	D	D	28.7	4.0%	C	21.2	4.4%
Between Arno Road and Dillard Road	D	D	29.0	4.3%	C	21.3	3.9%
Between Dillard Road and Grant Line Road	D	C	24.3	0.0%	C	21.7	0.0%
Between Grant Line Road and Elk Grove Boulevard	D	C	22.7	3.7%	C	20.9	4.0%
Between Elk Grove Boulevard and Bond Road <sup>1</sup>	D	C	23.2	5.0%	C	20.8	5.6%
<b>Southbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	27.5	1.1%	C	22.1	0.0%
Between Walnut Avenue and Twin Cities Road	D	D	29.8	4.2%	C	22.3	4.2%
Between Twin Cities Road and Mingo Road	D	D	32.8	4.8%	C	23.8	4.8%
Between Mingo Road and Arno Road	D	D	32.9	5.1%	C	23.5	3.1%
Between Arno Road and Dillard Road	D	D	27.4	4.6%	C	22.0	4.8%
Between Dillard Road and Eschinger Road	D	C	25.5	1.2%	C	21.8	0.9%
Between Eschinger Road and Grant Line Road	D	C	24.7	0.8%	C	21.4	1.4%
Between Grant Line Road and Elk Grove Boulevard	D	C	21.8	2.8%	C	20.7	3.5%
Between Elk Grove Boulevard and Bond Road	D	C	24.6	4.7%	B	15.2	6.3%
Note: Bold = unacceptable LOS <sup>1</sup> ΔDensity = change in density from 2018 baseline no project conditions Source: <b>Appendix O</b> – Traffic Impact Study.							

**TABLE 4.8-29**  
ALTERNATIVE E FREEWAY RAMP CONDITIONS

Interchange Location	Target LOS	Weekday P.M. Peak Hour			Saturday Peak Hour		
		Density (pc/mi/ln)	LOS	Δ Density (%)	Density (pc/mi/ln)	LOS	Δ Density (%)
<b>Hwy 99 Ramps at Twin Cities Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	35.3	E	3%	27.8	C	4.1%
West Stockton Boulevard/Hwy 99 SB On-Ramp (north)	D	29.6	D	3.5%	23.8	C	4.4%
West Stockton Boulevard/Hwy 99 SB On-Ramp (south)	D	31.2	D	3.3%	24.9	C	4.2%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.2	D	3.3%	24.6	C	4.2%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	30.2	D	2.7%	23.8	C	3.5%
<b>Hwy 99 Ramps at Mingo Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	33.8	D	3.4%	26.3	C	4.4%
West Stockton Boulevard/Hwy 99 SB On-Ramp	D	35.4	E	2.9%	28.5	D	3.3%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	30.8	D	3.4%	23.5	C	4.0%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	32.7	D	3.2%	37.7	E	50.2%
<b>Hwy 99 Ramps at Grant Line Road</b>							
Hwy 99 NB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 NB On-Ramp (WB Right)	D	19.6	B	3.7%	18.0	B	4.0%
Hwy 99 NB On-Ramp (EB Loop)	D	20.4	C	14.6%	19.9	C	15.0%
Hwy 99 SB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 SB On-Ramp (WB Loop)	D	23.3	C	12.6%	21.2	C	14.0%
Hwy 99 SB On-Ramp (EB Right)	D	22.9	C	0.9%	19.8	B	1.0%
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.							

As shown in **Table 4.8-28**, with the addition of Alternative E traffic, no freeway mainlines will operate at an unacceptable LOS.

As shown in **Table 4.8-29**, the addition of Alternative E traffic will cause the following freeway ramps to operate at an unacceptable LOS:

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

Alternative E traffic would add to the background congestion of the freeway mainline and ramps. There are mainline segment and ramp locations that would operate at unacceptable LOS as a result of the project, or would operate at unacceptable LOS without the project and experience an increase in density of more than five percent with the addition of the project. Significant congestion is expected with or without the project.

The increase in traffic generated by Alternative E would contribute to unacceptable traffic operations at the study intersections outlined above. Without mitigation, these intersections would operate below acceptable LOS standards described in **Section 4.8.1**. Mitigation measures have been recommended within the TIA and included within **Section 5.8**. Upon implementation of recommended mitigation, Alternative E would have a less than significant effect associated with traffic and circulation.

### Site Access

Site access for the Historic Rancheria is the same as that described under Alternative D in **Section 4.8.5**.

### Roadway Conditions

Alternative E is anticipated to add up to 2,500 vehicle trips per day to Dillard Road between SR-99 and Wilton Road, which represents about a 68 percent increase over the projected no-project traffic volumes along this segment. Additionally, Alternative E is anticipated to add about 2,500 new daily trips to Wilton Road between Green Road and Dillard Road, which represents about a 75 percent increase over the projected no-project traffic volumes along this segment. Impacts to roadway conditions would be similar to those under Alternative D and mitigation is included in **Section 5.8** to reconstruct these roadway segments to Sacramento County standards. Impacts to Green Road would also be similar to Alternative D and mitigation is included in **Section 5.8** to improve Green Road so that it can accommodate Alternative E traffic.

### Transit, Bicycle, and Pedestrian Facilities

The Historic Rancheria site is not served by any fixed route transit service; therefore, no significant impact to transit service will occur as a result of Alternative E.

As with Alternative D, there are little-to-no sidewalks, trails or designated bicycle facilities within the vicinity of Historic Rancheria site; thus, Alternative E would not inhibit access to or eliminate any existing facilities, nor would the project prevent the implementation of any planned facilities.

## 4.8.7 ALTERNATIVE F – CASINO RESORT AT MALL SITE

### Construction Traffic

There may be up to 400 worker and material haul trips per day during construction of Alternative F. Impacts resulting from the construction of Alternative F would be temporary in nature. It is not anticipated that construction traffic associated with Alternative F would have a significant effect on the roadway bed. However, mitigation is included in **Section 5.8** that would ensure that roadways subject to construction traffic are evaluated for road bed degradation and resurfaced as necessary.

Construction activity impacts would be concentrated on Promenade Parkway in the immediate vicinity of the site. Traffic-related construction impacts typically experienced may include traffic delays, one-way traffic control, temporary road closures, and traffic detours. The construction traffic impact would represent a temporary and less than significant inconvenience to travelers on affected roadways and area residents. However, this level of truck traffic may have an impact on quality of life including increased noise, visual impact, and a perception of lower traffic safety. Tracking of debris and mud onto roadways may create a perceptual impact as well as a physical impact. Mitigation is included in **Section 5.8** to reduce construction impacts to a less than significant level.

**Project Traffic**

***Trip Generation***

The projected vehicle trip generation resulting from Alternative F is shown in **Table 4.8-30**. Methodology used to determine trip generation and distribution is described above under **Section 4.8.1**.

**TABLE 4.8-30**  
ALTERNATIVE F PEAK HOUR TRIP GENERATION

Land Use	ITE Code	Quantity	Units	Weekday Daily	P.M. Peak Hour			Saturday Daily	Saturday Peak Hour		
					In	Out	Total		In	Out	Total
Casino	N/A	110,260	SF Gaming Floor Area	9,041	510	575	1,085	14,493	954	1,075	2,029
<i>Trip Reductions (10%)</i>				<i>(271)</i>	<i>(17)</i>	<i>(16)</i>	<i>(904)</i>	<i>(54)</i>	<i>(54)</i>	<i>(108)</i>	<i>(1,449)</i>
Convention Area	N/A	3,130	Seats	2,330	140	35	175	2,330	140	35	175
Hotel	310	302	Rooms	626	23	23	46	629	31	24	55
<b>Net New Vehicle Trips</b>				<b>11,093</b>	<b>619</b>	<b>579</b>	<b>1,198</b>	<b>16,003</b>	<b>1,023</b>	<b>1,033</b>	<b>2,056</b>

Source: **Appendix O** – Traffic Impact Study.

***Trip Distribution***

Under Alternative F, it was estimated that approximately 42 percent of Alternative F traffic would come from destinations north of the site via Hwy 99 and approximately 19 percent of Alternative F traffic would come from destinations south of the site via Hwy 99. Additionally, approximately 17 percent of Alternative F trips would come from Elk Grove and approximately 13.5 percent of Alternative F trips would come from eastern Sacramento County and El Dorado County. Refer to Figure 61 of **Appendix O**.

**Traffic Conditions with Alternative F**

To assess the impacts of the project on transportation facilities in the study area, the projected number of trips generated by Alternative F was added to baseline conditions (refer to **Section 4.8.1**).

**Table 4.8-31** shows the P.M. and Saturday peak hour intersection delay and LOS at each of the study intersections under Alternative F. Turning volumes at each of the study intersections under baseline plus Alternative F traffic conditions are provided within the TIA (**Appendix O**).

**TABLE 4.8-31**  
ALTERNATIVE F INTERSECTION CONDITIONS

Intersection <sup>1</sup>	Critical Approach/ Movement	LOS Target	P.M. Peak		Saturday Peak	
			LOS	Delay	LOS	Delay
Hwy 99 NB Ramps/Grant Line Rd	-	D	B	13.0	A	8.9
Hwy 99 SB Ramps/Grant Line Rd	-	D	B	10.5	B	14.8
Promenade Parkway/Kammerer Rd	-	D	D	40.0	C	22.3
Promenade Parkway/Bilby Rd	-	D	C	32.9	<b>F</b>	<b>211.9</b>
Grant Line Rd/East Stockton Blvd	-	D	<b>E</b>	<b>57.3</b>	C	28.8
Grant Line Rd/Bond Rd	-	D	C	23.7	C	20.7
Grant Line Rd/Sheldon Rd	-	D	C	20.8	B	11.8
Wilton Rd/Green Rd	-	D	B	11.2	A	8.9
Grant Line Rd/Wilton Rd	-	D	D	53.4	C	25.2
Wilton Rd/Dillard Rd	-	D	A	8.1	A	7.4
Wilton Rd/Cosumnes Rd	EB	D	C	15.5	B	12.0

Note: Bold = unacceptable LOS  
<sup>1</sup>Only intersections studied for Alternative F appear in table.  
 Source: **Appendix O** – Traffic Impact Study

As shown in **Table 4.8-31**, with the addition of Alternative F traffic, the following study intersection is projected to operate at an unacceptable LOS:

- Promenade Parkway/Bilby Road
- Grant Line Road/East Stockton Boulevard

It should be noted that the intersection of Grant Line Road/East Stockton Boulevard is projected to operate at unacceptable LOS E with or without the addition of Alternative F. However, Alternative F would not increase the average control delay at the intersection by five seconds or more; thus, no significant impact would occur at this location.

**Table 4.8-32** summarizes the study roadway conditions under Alternative F.

As shown in **Table 4.8-32**, with the addition of Alternative F traffic, the following study roadway segments are project to operate at an unacceptable LOS:

- Twin Cities Road – Fermoy Way to Marengo Road
- Grant Line Road – Waterman Road to Bradshaw Road

- Grant Line Road – Bradshaw Road to Wilton Road
- Grant Line Road – Wilton Road to Calvine Road
- Grant Line Road – Calvine Road to Jackson Road

**TABLE 4.8-32**  
ALTERNATIVE F ROADWAY CONDITIONS

Roadway	Target LOS	Weekday			Saturday		
		ADT	LOS	ΔV/C <sup>1</sup>	ADT	LOS	ΔV/C
Twin Cities Road (SR-104) – Fermoy Way to Marengo Road	E	<b>23,185</b>	<b>F</b>	<b>+0</b>	13,197	C	
Twin Cities Road –West of Hwy 99	E	7,060	A		4,019	A	
East Stockton Boulevard – Hwy 99 NB on-ramp to Mingo Rd	E	472	A		529	A	
West Stockton Boulevard – Hwy 99 SB off-ramp to Hwy 99 SB ramps near Mingo Road	E	95	A		144	A	
Promenade Parkway – Kammerer Rd to Bilby Rd	D	19,883	A		20,504	A	
Promenade Parkway – Bilby Rd to Kyler Rd	D	7,884	A		4,529	A	
Promenade Parkway – Kyler Rd to Whitelock Pkwy	D	7,159	A		4,137	A	
Kammerer Road – Bruceville Rd to Lent Ranch Pkwy	D	12,712	D		11,830	D	
Kammerer Road – Lent Ranch Parkway to Hwy 99	D	13,075	A		12,143	A	
Grant Line Road – Hwy 99 to East Stockton Blvd/Survey Rd	D	26,116	A		20,729	A	
Grant Line Road – East Stockton Blvd/Survey Rd to Waterman Rd	D	25,259	C		20,074	A	
Grant Line Road – Waterman Rd to Bradshaw Rd	D	<b>23,057</b>	<b>F</b>	<b>+0.055</b>	<b>18,314</b>	<b>F</b>	<b>+0.08</b>
Grant Line Road – Bradshaw Rd to Wilton Rd	D	<b>19,087</b>	<b>F</b>	<b>+0.049</b>	15,323	D	
Grant Line Road – Wilton Rd to Calvine Rd	D	<b>20,542</b>	<b>F</b>	<b>+0.049</b>	16,042	D	
Grant Line Road – Calvine Rd to Jackson Rd	D	<b>19,467</b>	<b>F</b>	<b>+0.049</b>	15,235	D	
Dillard Road – Hwy 99 to Wilton Rd	D	4,741	C		3,633	C	
Wilton Road – Grant Line Rd to Green Rd	D	9,965	D		8,321	D	
Wilton Road – Green Rd to Dillard Rd	D	3,791	C		3,292	B	
Green Road – Wilton Rd to Project Alternative D/E access road	D	4,129	C		3,754	C	
Green Road – Project Alternative D/E access road to Dillard Rd	D	2,089	B		2,077	B	
Note: Bold = unacceptable LOS <sup>1</sup> ΔV/C = change in volume to capacity ratio from 2018 baseline no project conditions Source: <b>Appendix O</b> – Traffic Impact Study							

It should be noted that the roadway segments along Twin Cities Road from Fermoy Way to Marengo Road, and Grant Line Road from Bradshaw Road to Jackson Road are projected to operate at unacceptable LOS F with or without Alternative F. Additionally, Alternative A would not result in an increase to the roadway segment V/C ratio of 0.05 or more; thus, no significant impact would occur at these roadway segments.

**Table 4.8-33** and **Table 4.8-34** summarize the freeway segment and freeway ramp conditions under Alternative F.

**TABLE 4.8-33**  
ALTERNATIVE F FREEWAY MAINLINE CONDITIONS

Hwy 99 Segment	Target LOS	Weekday			Saturday		
		LOS	Density (pc/mi/ln)	Δ Density (%) <sup>1</sup>	LOS	Density (pc/mi/ln)	Δ Density (%)
<b>Northbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	31.1	5.1%	C	21.1	5.5%
Between Walnut Avenue and Twin Cities Road	D	D	27.7	4.9%	C	21.1	5.5%
Between Twin Cities Road and Mingo Road	D	D	28.8	5.1%	C	21.3	4.9%
Between Mingo Road and Arno Road	D	D	29.0	5.1%	C	21.4	5.4%
Between Arno Road and Dillard Road	D	D	29.3	5.4%	C	21.6	5.4%
Between Dillard Road and Grant Line Road	D	C	25.6	5.3%	C	22.8	5.1%
Between Grant Line Road and Elk Grove Boulevard	D	C	25.6	16.9%	C	23.0	14.4%
Between Elk Grove Boulevard and Bond Road	D	C	23.7	7.2%	C	21.2	7.6%
<b>Southbound</b>							
Between Ayers Lane and Walnut Avenue	D	D	28.5	4.8%	C	23.1	4.5%
Between Walnut Avenue and Twin Cities Road	D	D	29.9	4.5%	C	22.3	4.2%
Between Twin Cities Road and Mingo Road	D	D	32.8	4.8%	C	23.8	4.8%
Between Mingo Road and Arno Road	D	D	32.9	5.1%	C	23.8	4.4%
Between Arno Road and Dillard Road	D	D	27.4	4.6%	C	22.0	4.8%
Between Dillard Road and Eschinger Road	D	D	26.4	4.8%	C	22.6	4.6%
Between Eschinger Road and Grant Line Road	D	C	25.6	4.5%	C	22.1	4.7%
Between Grant Line Road and Elk Grove Boulevard	D	C	24.4	15.1%	C	23.1	15.5%
Between Elk Grove Boulevard and Bond Road	D	C	25.4	8.1%	B	15.9	11.2%
<sup>1</sup> ΔDensity = change in density from 2018 baseline no project conditions Source: <b>Appendix O</b> – Traffic Impact Study.							

As shown in **Table 4.8-33**, the addition of Alternative F traffic will not cause any freeway mainline segments to operate at an unacceptable LOS.

As shown in **Table 4.8-34**, the addition of Alternative F traffic will cause the following freeway ramps to operate at an unacceptable LOS:

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- West Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

Alternative F traffic would add to the background congestion of the freeway mainline and ramps. There are mainline segment and ramp locations that would operate at unacceptable LOS as a result of the project, or will operate at unacceptable LOS without the project and experience an increase in density of

more than five percent with the addition of the project. Significant congestion is expected with or without the project.

**TABLE 4.8-34**  
ALTERNATIVE F FREEWAY RAMP CONDITIONS

Interchange Location	Target LOS	Weekday P.M. Peak Hour			Saturday Peak Hour		
		Density (pc/mi/ln)	LOS	Δ Density (%)	Density (pc/mi/ln)	LOS	Δ Density (%)
<b>Hwy 99 Ramps at Twin Cities Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	35.3	E	3%	27.8	C	4.1%
West Stockton Boulevard/Hwy 99 SB On-Ramp (north)	D	29.6	D	3.5%	23.8	C	4.4%
West Stockton Boulevard/Hwy 99 SB On-Ramp (south)	D	31.2	D	3.3%	24.9	C	4.2%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.4	D	4.0%	24.8	C	5.1%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	30.4	D	3.4%	24.0	C	4.3%
<b>Hwy 99 Ramps at Mingo Road</b>							
West Stockton Boulevard/Hwy 99 SB Off-Ramp	D	33.8	D	3.4%	26.3	C	4.4%
West Stockton Boulevard/Hwy 99 SB On-Ramp	D	35.4	E	2.9%	28.5	D	3.3%
East Stockton Boulevard/Hwy 99 NB Off-Ramp	D	31.0	D	4.0%	23.8	C	5.3%
East Stockton Boulevard/Hwy 99 NB On-Ramp	D	32.8	D	3.5%	37.9	E	51.0%
<b>Hwy 99 Ramps at Grant Line Road</b>							
Hwy 99 NB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 NB On-Ramp (WB Right)	D	21.8	C	15.3%	20.1	C	16.2%
Hwy 99 NB On-Ramp (EB Loop)	D	20.4	C	14.6%	19.9	C	15.0%
Hwy 99 SB Off-Ramp	D	<5	A	-	<5	A	-
Hwy 99 SB On-Ramp (WB Loop)	D	23.3	C	12.6%	21.2	C	14.0%
Hwy 99 SB On-Ramp (EB Right)	D	23.6	C	4.0%	20.5	C	4.6%
Note: Bold = unacceptable LOS Source: <b>Appendix O</b> – Traffic Impact Study.							

The increase in traffic generated by Alternative F would contribute to unacceptable traffic operations at the study intersections outlined above. Without mitigation, these intersections would operate below acceptable LOS standards described in **Section 4.8.1**. Mitigation measures have been recommended within the TIA and included within **Section 5.8**. Upon implementation of recommended mitigation, Alternative F would have a less than significant effect associated with traffic and circulation. The 2016 MOU between the Tribe and the City of Elk Grove includes a roadway contribution provision that is intended to address impacts due to Alternative F traffic.

**Site Access**

The intersection of Promenade Parkway and Bilby Road will serve as the primary access driveway to Alternative F. Access to the Mall Site would be provided from Promenade Parkway, located northwest of

the Hwy 99/Grant Line Road-Kammerer Road interchange. The main project access driveway is at the east leg of the Bilby Road/North Mall Entrance signalized intersection. An additional right-in/right-out only driveway would provide access to the site just north of the main entrance. For the purposes of this analysis, the project access driveways are assumed to retain the current lane configurations and traffic control with the addition of Alternative F.

### **Roadway Conditions**

Alternative F is anticipated to add up to 1,500 vehicle trips per day to Kammerer Road, which represents about a 13 percent increase over the projected no-project traffic levels. Kammerer Road from Hwy 99 to Bruceville Road currently has no shoulders. Therefore, in its current condition, this roadway segment would not support traffic generated by Alternative F. As part of the Capital Southeast Connector Project, future widening is planned for Kammerer Road, as well as an ultimate connection between I-5 and Hwy 99. Mitigation is included in **Section 5.8** for the Tribe to pay its fair-share contribution towards mitigation costs for improvements to Kammerer Road. The 2016 MOU between the Tribe and the City of Elk Grove includes a regional roadway contribution that is intended to address this impact.

### **Transit, Bicycle, and Pedestrian Facilities**

The Mall site is not served by any fixed route transit service; therefore, no significant impact to transit service will occur as a result of Alternative F.

There are existing sidewalks and bike lanes within the vicinity of the Mall site, and Alternative F is not anticipated to inhibit access to or eliminate any existing facilities, nor would it prevent the implementation of any planned facilities.

### **4.8.8 ALTERNATIVE G – NO ACTION**

The traffic conditions under the No Action alternative are characterized in **Section 4.8.1** for baseline conditions. No additional traffic would be added to the local intersections for the Twin Cities site and the Historic Wilton Rancheria site as they are not expected to be developed in the near-term; therefore, no effects would occur under this alternative for those two sites. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts to traffic and transportation resources would occur as with Alternative F as a result of the No Action alternative.

## 4.9 LAND USE

This section identifies the direct effects to land use that would result from the development of each alternative described in **Section 2.0**. Effects are measured against the environmental baseline presented in **Section 3.9**. Cumulative effects are identified in **Section 4.15**, while indirect effects associated with off-site construction and growth-inducement are identified in **Section 4.14**. Mitigation measures, if warranted, are included in **Section 5.9**.

### 4.9.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Land Use

As discussed in **Section 3.9**, Alternative A would result in approximately 282-acres of land being transferred from fee to federal trust, thereby removing the property from Sacramento County (County) land use jurisdiction and the City of Galt (City) Sphere of Influence (SOI) planning area. County and/or City land use regulations would not apply to the Twin Cities site once the land is taken into trust. The only applicable land use regulations would be federal and Tribal, as the Twin Cities site would be converted to reservation land. The Tribe relies upon the Tribal Council, the governing body of the Tribe, to guide and regulate land use on tribal lands. Note that consistency or inconsistency with local land use regulations does not by itself constitute an environmental impact. Environmental impacts, such as potential conflicts with neighboring land uses, are discussed below.

Alternative A would be consistent with most, but not all, goals, objectives, and policies of the County and the City, as evaluated policy by policy in **Table 4.9-1** and **Table 4.9-2**, respectively. Therefore, minimal conflict exists between Alternative A and goals, objectives, and policies of the County and the City.

Agricultural operations on adjacent property to the north and west of the Twin Cities site could result in land use compatibility impacts with Alternative A associated with dust and noise from operation of farm equipment and the use of pesticides and other chemical applications. Periodic dust and noise represent a potentially minor annoyance for on-site customers.

Alternative A would include the development of a hotel and casino on the Twin Cities site. These land uses would replace existing agricultural and open space uses and would differ from adjacent land uses. Alternative A, located in the City's SOI area, would involve commercial development on land that is currently planned for commercial/office professional/industrial in the City 2030 General Plan (City of Galt, 2009a). Alternative A would be consistent with the planned removal of agricultural designation of the site through the 2030 City General Plan, would not physically disrupt neighboring land uses, would not prohibit access to neighboring parcels, or otherwise significantly conflict with neighboring land uses. Therefore, significant land use effects would not occur.

**TABLE 4.9-1**  
SACRAMENTO COUNTY GENERAL PLAN CONSISTENCY – ALTERNATIVES A, B, AND C

Sacramento County		Alternatives		
Policies	Sacramento County Planning Polices	Alternative A	Alternative B	Alternative C
LU-11	It is the intent of the County to comprehensively plan for the revitalization of the targeted commercial corridors and invest the resources necessary to achieve the following: stimulate private investment; encourage development of vacant and underutilized parcels; support reuse and/or rehabilitation of abandoned or blighted buildings; encourage rezoning of excess industrial and commercial lands to allow for medium and high density residential or mixed use projects, and; avoid non transit supportive uses, such as industrial uses, low density residential, and uses that would necessitate large parking lots fronting on the street.	Alternative A is consistent with this goal as it is located within the Urban Policy Area.	Same as Alternative A	Same as Alternative A
LU-15	Planning and development of new growth areas should be consistent with Sacramento County-adopted Habitat Conservation Plans and other efforts to preserve and protect natural resources.	Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
LU-17	Support implementation of the design review program on a project-by-project basis to ensure that all development applications positively contribute to the immediate neighborhood and the surrounding community.	Alternative A is consistent with this policy, as this document details the impacts of the development.	Same as Alternative A	Same as Alternative A
LU-18	Encourage development that complements the aesthetic style and character of existing development nearby to help build a cohesive identity for the area.	There is little development in the vicinity of Alternative A.	Same as Alternative A	Same as Alternative A
LU-19	Incompatible urban land uses should be buffered from one another by methods that retain community character, and do not consume large land areas or create pedestrian barriers.	There is a highway separating Alternative A from the Intensive Industrial area to the east.	Same as Alternative A	Same as Alternative A
LU-20	Planning processes for existing communities, commercial corridors and new growth areas shall provide for distinct and identifying physical elements, which may include: gateways, signage, public art, common site or street layout, shared design qualities of buildings or infrastructure, or prominent landmarks or destinations	Alternative A is inconsistent with this policy.	Same as Alternative A	Same as Alternative A
LU-24	Support private development requests that propose pedestrian- and transit-friendly mixed use projects in commercial corridors, town centers, and near existing or proposed transit stops.	Alternative A includes the development of transit facilities.	Same as Alternative A	Same as Alternative A
LU-31	Strive to achieve a natural nighttime environment and an uncompromised public view of the night sky by reducing light pollution	Alternative A is inconsistent with this policy. See <b>Section 4.13</b> , Aesthetics.	Same as Alternative A	Same as Alternative A

4.0 Environmental Consequences

Sacramento County		Alternatives		
Policies	Sacramento County Planning Polices	Alternative A	Alternative B	Alternative C
LU-46	Assure that regionally-oriented commercial and office uses and employment concentrations have adequate road access, high frequency transit service and an adequate but efficient supply of parking.	Alternative A includes 3,500 parking spaces and a transit facility. Site access is discussed in <b>Section 2.0</b> .	Same as Alternative A	Same as Alternative A, except with 3,320 parking spaces.
LU-49	Discourage the creation of excessive amounts of retail shopping facilities.	As shown in <b>Table 2-1</b> , Alternative A includes the creation of only 2,600 square feet of retail.	Same as Alternative A	Alternative C includes 185,000 square feet of retail development, which is less consistent with this policy than Alternatives A and B.
LU-102	Ensure that the structural design, aesthetics and site layout of new developments is compatible and interconnected with existing development.	Alternative A is consistent with commercial/retail development along Highway 99.	Same as Alternative A	Same as Alternative A
Source: Sacramento County, 2011				

**TABLE 4.9-2**  
CITY OF GALT GENERAL PLAN CONSISTENCY – ALTERNATIVES A, B, AND C

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
LU-1.1: Phased Development	<p>The City shall establish three prioritized development phases.</p> <p>Phase I Includes only the areas within the existing 2007 city limits, which can be adequately served by public facilities, including the City’s wastewater treatment plant.</p> <p>Phase II Includes areas outside of the existing 2007 city limits but close to available public services and infrastructure. This includes land in the “notch” (the area generally along Simmerhorn and Boessow Roads between Highway 99 and Marengo Road), the eastern part of the Planning Area, the area north of Twin Cities Road between the Union Pacific mainline and State Route 99, and the proposed expansion of the existing industrial park between Live Oak Avenue and Spring Street. The main purpose of this policy is to limit public facilities provision outside of these areas in order to encourage a compact urban form, limit the cost of providing public facilities, and provide for urban land uses to meet the needs of the projected 2030 population. Developers of land within Phase II will be required to obtain approval of a Specific Plan prior to annexation.</p> <p>Phase III Includes areas beyond Phase II that will require major upgrades to the City’s public facilities and services. These lands are relatively far from public services and infrastructure. Phase III lands, excluding land for needed public facilities and services (parks, schools, etc.), will also be required to provide a Specific Plan Proposal for development consideration in accordance with the procedures noted for Phase II lands. The City shall, when deemed necessary, consider the appropriateness of development in the Phase III area.</p>	<p>Alternative A is in a Phase II area, which was established in part to limit public facilities and encourage a compact urban form. Since the land would be placed in trust as part of this Alternative, annexation to the City would not occur. Alternative A includes comparable land uses on the Twin Cities site (such as commercial use) as would occur should the City annex and re-designate the site in the future. However, this policy requires Specific Plan approval, which would not occur once the land is placed in trust. Therefore, Alternative A is partially consistent with this policy.</p>	Same as Alternative A	Same as Alternative A
LU-1.2: Proposed Development Consistency	The City shall review development proposals in detail for consistency with General Plan policies	The City is acting as a cooperating agency during the Environmental Impact Statement (EIS) process and, as such, reviewing development proposals in details. Therefore	Same as Alternative A	Same as Alternative A

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
		Alternative A is consistent with this policy.		
LU-1.3: Annexation Areas	When considering annexations and specific plans, the City should ensure that the boundaries of proposed annexation areas are reasonable and logical and that “islands or peninsulas” of land are not created.	Alternative A would place the Twin Cities site in trust, which would render it ineligible for future City annexation. It is unknown at this time what future annexation may occur surrounding the Twin Cities site; therefore it cannot be determined if Alternative A might create a future “island” of land within city limits. However, under existing conditions, this would not occur as current City boundaries exist only to the south of the site. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
LU-1.6: Orderly Growth	The City shall ensure that development occurs in an orderly sequence based on the logical and practical extension of public facilities and services.	Alternative A includes off-site water/wastewater options that would correspond with the City’s future infrastructure planning. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
LU-1.7 Fiscal Balance	The City shall designate land for development consistent with the needs of the community and consistent with its efforts to maintain a positive fiscal balance for the City.	The Twin Cities site is located in an area prioritized for Phase II development, within the City SOI and would positively contribute to the City’s fiscal balance and community needs, such as increased employment. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
LU-1.8: Infrastructure	The City shall manage growth to keep pace with planned facilities and service improvements.	Alternative A includes off-site water/wastewater options that would correspond with the City’s planned future infrastructure growth. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
LU-1.10: South Sacramento County Habitat Conservation	The City shall coordinate habitat preservation efforts with Sacramento County to maintain critical species habitat preservation zoning on open space north of the Planning Area and within the proposed South Sacramento County	Alternative A is not in designated critical habitat nor on land zoned for open space. Mitigation in Section 5.5 addresses impacts to biological	Same as Alternative A	Same as Alternative A

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
Plan	Habitat Conservation Plan. The City shall continue to mitigate impacts on special habitats and endangered species in consultation with applicable Federal and State agencies prior to adoption of the South Sacramento County Habitat Conservation Plan.	resources. Therefore, Alternative A is consistent with this policy.		
LU-1.12:Fair Share Capital Costs on New Development	The City shall require new development to pay its fair share of capital costs for necessary infrastructure improvements.	The Tribe would be required to pay for its fair share of the cost of constructing infrastructure improvements required for each Alternative. Therefore, Alternative A is consistent with this policy.	Same as Alternative A.	Same as Alternative A.
LU-1.13: Zoning Consistency	The City shall ensure that the Zoning Ordinance and Zoning Map are consistent with the General Plan.	This policy is inapplicable as Alternative A would remove the Twin Cities site from the City's SOI and from potential future annexation, after which City zoning and General Plan designations would not apply.	Same as Alternative A	Same as Alternative A
LU-2.3:Smart Growth Principles and Sustainable Land Use Practices	Smart growth principles and sustainable land use practices (Low Impact Development) shall be incorporated into development project proposals, to the extent possible, including, but not limited to, mixed use developments, energy and environmental conservation, use of renewable energy sources, building orientation to maximize solar and wind power opportunities, minimizing permeable surfaces to reduce/treat stormwater, and maximizing walking and biking connections within neighborhoods and to outside activity areas. Projects that impede or obstruct pedestrian or bicycle access in the community shall be prohibited. The City should also encourage coordination with the Sacramento Area Council of Governments and the Blueprint principles on new planned unit developments and specific plans.	Alternative A is consistent with this smart growth policy, as energy and environmental conservation measures are included as part of the project design, detailed in <b>Section 2.0</b> .	Same as Alternative A	Same as Alternative A
LU-2.4: Site Design	The City shall require the use of durable and aesthetically pleasing building materials and encourage pedestrian-oriented design with attractive open space to enhance living and working areas.	Mitigation in <b>Section 5.13</b> includes the use of several aesthetic elements, such as earth tones and native building materials, for Alternative A. As well, Alternative A would include appropriate pedestrian facilities and landscaping to aesthetically enhance the open space. Therefore, Alternative A is consistent with this policy.	Same as Alternative A.	Same as Alternative A.

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
LU-6.1: Regional Commercial Areas	The City should designate areas of the city best suited for regional commercial uses. The intent is to create convenient and desirable conditions for regional retail customers and employees, to increase economic benefits, and to ensure separation of incompatible uses.	Alternative A would remove the Twin Cities site from the City’s SOI and from potential future annexation, after which City land use designations would not apply. Therefore, Alternative A is neither consistent nor inconsistent with this policy. However, Alternative A includes commercial development that would be consistent with the City’s stated future intended use for the site.	Same as Alternative A.	Same as Alternative A.
LU-7.1: Office Professional Development	The City should designate areas of the city best suited for office professional uses. The intent of this designation is to create convenient and desirable workplaces close to commercial and service amenities. This use can also provide a good transition between regional commercial and residential uses.	Alternative A would remove the Twin Cities site from the City’s SOI and from potential future annexation, after which City land use designations would not apply. Therefore, Alternative A is neither consistent nor inconsistent with this policy.	Same as Alternative A.	Same as Alternative A.
LU-8.1: Industrial Designation	The City should designate areas of the City best suited for industrial uses. The intent of this designation is to promote opportunities for manufacturing, distribution, and warehousing. These areas will create economic benefits, employment, and ensure separation of incompatible uses by clearly delineating concentrated areas of industrial use.	Alternative A would remove the Twin Cities site from the City’s SOI and from potential future annexation, after which City land use designations would not apply. Therefore, Alternative A is neither consistent nor inconsistent with this policy.	Same as Alternative A.	Same as Alternative A.
LU-8.5: Refuse Transfer Station	The City should coordinate efforts with the refuse service provider to locate a new refuse transfer station along the railroad tracks, north of Twin Cities Road.	This policy is inapplicable as it is a City-driven public services project that is outside the Tribe’s ability to implement.	Same as Alternative A.	Same as Alternative A.
LU-9.1 Greenbelt	The City should participate in regional efforts to establish a permanent agriculture, open space, and wildlife habitat greenbelt between the northern boundary of the Planning Area and the City of Elk Grove.	The Twin Cities site is north of the City within the SOI. The greenbelt would be north of the site and its creation would not be hindered by Alternative A. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
LU-9.2: Agricultural-Residential Uses	The City shall strongly encourage Sacramento County to deny the subdivision of agricultural land near Galt for agricultural-residential uses at a minimum lot size of less than two acres west of the 2007 city limits and less than five acres east/north of the 2007 city limits.	This policy is inapplicable as Alternative A would not result in residential housing.	Same as Alternative A	Same as Alternative A

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
LU-10.1: Environmental Justice	The City shall ensure the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of land use and environmental laws, regulations, and policies. The City shall ensure that no part of the community suffers disproportionately from adverse human health or environmental effects, and all people live in clean, healthy, and sustainable communities	There would be no significant adverse effects on sensitive receptors as a result of Alternative A. Furthermore, Alternative A would promote the advancement of a clean, healthy, and sustainable community that has historically been given inequitable treatment by government and society. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
LU-10.2: Equal Public Participation	The City shall ensure that all community residents have an opportunity for public participation in the decision-making process.	The preparation of an Environmental Impact Statement (EIS) in accordance with NEPA provides for public participation through scoping meetings, comment letters, and public meetings. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
C-1.3: Levels of Service	The City should develop and manage its roadway system to maintain LOS "E" on all streets and intersections within a quarter-mile of State Route 99, along A Street and C Street between State Route 99 to the railroad tracks, and along Lincoln Way between Pringle Avenue to Meladee Lane. The City should develop a LOS "D" or better on all other streets and intersections.	This policy was used to assess traffic impacts in the traffic impact study, included as <b>Appendix O</b> . As discussed in <b>Section 4.8</b> , traffic impacts would be reduced to less-than-significant levels through the implementation of traffic improvements and mitigation detailed in <b>Section 5.8</b> ; with this mitigation, all streets would operate at an LOS D or better. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
C-1.9: Traffic Impact Analysis and Funding	The City shall require an analysis of the effects of traffic from proposed major development projects. Each such project shall construct or fund improvements necessary to mitigate the effects of traffic from the project.	Traffic effects of Alternative A are detailed in the traffic impact study included as <b>Appendix O</b> . Potential traffic effects of Alternative A are also analyzed in <b>Section 4.8</b> . Mitigation measures detailing necessary traffic improvements are included in <b>Section 5.8</b> . Implementation of these mitigation measures would ensure that traffic effects caused by Alternative A are reduced to less than significant levels. Therefore, Alternative A is consistent	Same as Alternative A	Same as Alternative A

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
		with this policy.		
C-3.2: New Developments	The City should consider the effects of new development on local streets in residential areas and require new development to mitigate significant impacts on residential neighborhoods.	This policy is inapplicable as the Twin Cities site is not located in a residential area. However, traffic impacts on local streets are analyzed in <b>Section 4.8</b> and <b>Appendix O</b> . Mitigation for such impacts is included in <b>Section 5.8</b> .	Same as Alternative A	Same as Alternative A
C-4.1: New Developments	The City shall ensure that adequate on- and off-street parking is provided in existing and new development. The adequacy and appropriateness of parking requirements in the Zoning Ordinance shall be periodically reevaluated.	Alternative A offers ample off-street parking (approximately 3,500 spaces, see <b>Section 2.2.5</b> ). Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
C-4.4: Visual Impacts	The City shall require new parking lots to be designed to minimize visual impacts on public roadways and neighboring areas.	Alternative A would include landscaping and other visual screening elements ( <b>Section 5.13</b> ) to minimize the visual impact of the project. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
C-4.7: Over-Sized Parking Lots	The City should continue to discourage parking lots that are in excess of the standards set forth in the City Code unless planned to accommodate alternative modes of travel including informal park & ride for express buses.	The City does not appear to have an official parking lot standard; therefore, this policy is inapplicable. However, Alternative A would include parking to accommodate alternative modes of travel, such as buses.	Same as Alternative A	Same as Alternative A
CC-1.11: Outdoor Lighting	The City shall ensure that future development includes provisions for the design of outdoor light fixtures to be directed/shielded downward and screened to avoid nighttime lighting spillover effects on adjacent land uses and nighttime sky conditions.	Potential lighting impacts are discussed in <b>Section 4.13</b> . Mitigation is included in <b>Section 5.13</b> to minimize the potential for significant lighting impacts, including the use of directed/shielded downward lighting on outside light fixtures. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-2.1: Sensitive Species Protection	The City should require minimization of impacts to protect mature trees, vernal pools, and any threatened endangered or other sensitive species when approving new development.	Alternative A is designed to avoid and sensitive habitat or wetlands. As well, several mitigation measures are suggested in <b>Section 5.5</b> to further reduce any impacts. No mature trees exist on the Twin Cities site. Therefore, Alternative A is consistent	Same as Alternative A	Same as Alternative A

4.0 Environmental Consequences

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
		with this policy.		
COS-2.2: Wetland and Riparian Communities Management	The City shall support the protection, restoration, expansion, and management of wetland and riparian plant communities for passive recreation, groundwater recharge, and wildlife habitat.	Impacts to wetlands and riparian plant communities under Alternative A are discussed in <b>Section 4.5</b> . Wetlands and riparian areas are avoided through project design. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-2.3: Biologically Sensitive Area Development	The City should require new development in areas that are known to have particular value for biological resources to maximize preservation of sensitive vegetation and wildlife habitat.	Impacts to biological resources under Alternative A are discussed in <b>Section 4.5</b> . Sensitive resources are avoided through project design. However, occurrence of these resources on the Twin Cities site is limited as it has been used for agricultural purposes for a many years. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-2.9: Minimize Lighting Impacts	The City should ensure that lighting associated with new development or facilities (including street lighting, recreational facilities, and parking) shall be designed to prevent artificial lighting from illuminating adjacent natural areas at a level greater than one foot candle above ambient conditions.	Lighting impacts are discussed in <b>Section 4.13</b> , and mitigation is included in <b>Section 5.13</b> to minimize the potential for significant lighting impacts, including the standard practice of using high pressure sodium or light-emitting diode (LED) with cut-off lenses and downcast illumination, as well as shielding outdoor lighting. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-5.1: Vehicle Emission Reduction Programs	The City should support land use, transportation management, infrastructure, and environmental planning programs that reduce vehicle emissions and improve air quality.	Air quality impacts are discussed in <b>Section 4.4</b> , and mitigation to reduce emissions and improve air quality are included in <b>Section 5.0</b> , including the use of alternative fuel vehicles onsite and multi-rider transportation options. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-7.3: Motor Vehicle Trip Reductions	The City shall encourage strategic land use patterns for businesses that reduce the number and length of motor vehicle trips and/or encourage alternative modes of travel.	See COS-5.1. Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-7.4: Energy Efficient	In addition to the energy regulations of Title 24, the City shall encourage the energy efficiency of new	Alternative A would incorporate several energy efficiency measures included in	Same as Alternative A	Same as Alternative A

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
Development	development. Possible energy efficient design techniques include provisions for solar access, building siting to maximize natural heating and cooling, and landscaping to aid passive cooling and protection from winter winds.	<b>Section 5.0</b> , including the potential use of solar technology and energy efficient appliances and equipment. Therefore, Alternative A is consistent with this policy.		
COS-7.5: Building Design and Components	The City shall encourage the implementation of cost-effective and innovative emission-reduction technologies in building components and design.	Alternative A would incorporate several emission reduction measures included in <b>Section 5.4</b> and <b>5.8.4</b> , including the use of alternative fuel vehicles onsite, recycling programs, tree and vegetation planting, purchasing of emission reduction credits, and multi-rider transportation options. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-7.6: Sustainable Design	The City shall promote the implementation of sustainable design strategies for “cool communities” such as reflective roofing, light colored pavement, and urban shade trees.	See COS-7.5. Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
COS-7.23: Water Diversion Plan	The City should require developers of commercial, industrial, and multi-family projects to prepare a waste diversion plan to recycle at least 50 percent of the materials generated for discard by their project during the construction phase in consultation with representatives of California Waste Recovery Systems. The waste diversion and recycling plan shall use best management practices in order to achieve the recycling target. The plan shall be subject to City Planning Department review and approval.	Alternative A would incorporate several waste diversion measures included in <b>Section 5.4.2</b> and <b>5.10.2</b> , recycling construction and operation waste and creating a solid waste management plan. It is unknown at this time if these measures would reduce solid waste by 50 percent; however, with these measures in place Alternative A would be consistent with the intent of this policy.	Same as Alternative A	Same as Alternative A
ED-1.1: Local-Serving Commercial	The City should pursue locally-oriented commercial uses and prioritize those uses that are underserved in Galt. The City should also expand upon the existing base of local-serving retail and service establishments as population increases create additional market demand.	Alternative A is a locally oriented commercial development project being proposed by local, long-time residents of the region. The project would serve the local and regional population. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
ED-1.2: Regional Commercial	The City should consider regional retail development opportunities that can serve the growing population in Galt, as well as residents in the surrounding communities. These opportunities also include highway commercial	Alternative A would be a commercial development with a retail component located alongside Highway 99, a freeway frontage location that would	Same as Alternative A	Same as Alternative A (Alternative C includes significantly more retail than Alternative A.)

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
	uses that serve travelers along State Route 99, and retail uses that significantly benefit from a freeway frontage road location, such as automotive uses.	greatly benefit its success. As well, Alternative A includes a comparable land use on the Twin Cities site (commercial) as is proposed by the City of Galt for future use, Therefore, Alternative A is consistent with this policy.		
PFS-1.2: Availability of Facilities and Services	The City should direct urban development to avoid scattered major new construction activities to minimize the cost of providing new public facilities and services. The City shall not approve new development where existing facilities are inadequate unless the following conditions are met: a. The applicant can demonstrate that all necessary public facilities will be installed or adequately financed (through fees or other means) in a timely fashion; and b. The facility improvements are consistent with applicable master or facility plans adopted by the City.	Necessary infrastructure would be installed, prior to operation of Alternative A, that is consistent with local infrastructure plans. See <b>Section 4.10</b> for more information. Fair share compensation shall be distributed to applicable agencies in compliance with service agreements to ensure public services are minimally impacted by the project ( <b>Section 5.10</b> ). Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-1.4: Financing from New Development	The City shall require development proposals to include plans for development and financing of public facilities and services.	As discussed in <b>Section 4.10</b> and <b>Section 5.10</b> , the Tribe will pay necessary connection and/or development fees. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-1.9: Fair Share Costs on New Developments	The City shall require that new development pay its fair share of the cost of providing new public services and/or the costs of expanding/upgrading existing facilities and services impacted by the new development.	As discussed in <b>Section 4.10</b> and <b>Section 5.10</b> , the Tribe will pay necessary connection and/or development fees. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-2.2: Groundwater Protection	The City should protect the groundwater basin from overdraft from city use of groundwater. To this end, the City shall study, working closely with other public and private entities as deemed appropriate, the safe yield of the groundwater basin. Water management programs such as conjunctive use and recharge programs should also be considered. The City should use this information to determine the most appropriate long-term water supply to serve Galt.	A groundwater study was conducted, and is included as <b>Appendix K</b> . Impacts to the groundwater as a result of Alternative A are discussed in <b>Section 4.3</b> , and mitigation to reduce impacts to groundwater supply are included in <b>Section 5.0</b> , including on-site and/or off-site groundwater recharge. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A

4.0 Environmental Consequences

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
PFS-2.3: Surface Water Protection	The City shall protect surface water resources, including rivers, creeks, streams, sloughs, and marshes, from development impacts.	Surface water impacts from Alternative A are discussed in <b>Section 4.3</b> , and mitigation to protect and minimize impacts to surface water is in <b>Section 5.0</b> , including diverting stormwater runoff to a sewer system and construction best management practices. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-2.9: Water Conservation	The City shall, to the extent practicable, promote water conservation and reduced water demand by: (a) Requiring water-conserving building design and equipment in new construction; (b) Encouraging water-conserving landscaping and other conservation measures; and (c) Encouraging retrofitting of existing development with water-conserving devices.	Alternative A would incorporate several water conservation measures into its operation, such as the use of low flow faucets and use of recycled water for irrigation and toilets ( <b>Section 5.3.2</b> ). Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-2.12: Fire Protection	The City shall ensure adequate water pressure throughout the city limits for fire protection purposes.	Fire flow is discussed in <b>Section 4.3</b> and <b>Section 4.10.1</b> . Fire flows under Alternative A will be adequate, and either provided by the City of Galt or on-site wells ( <b>Appendix I</b> ), and thus consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-3.4: Sewage Treatment	The City shall oppose urban development within the sphere of influence which is not sewered and shall oppose the use of “package treatment plants”. Urban development should be considered as less than 2 acre parcels on the west side of the Planning Area and less than 5 acre parcels on the north and east side of the Planning Area.	It is the Tribe’s intent to obtain sewer service from the City. If for any reason sewer service is not provided, the Tribe would construct a permanent WWTP, not a “package treatment plant”. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-3.9: Expand Use of Reclaimed Water	The City shall encourage the use of tertiary treated wastewater for irrigation of agricultural lands, large landscaped areas, and recreation/open space areas within close proximity to the City’s WWTP to help ensure ongoing compliance with RWQCB requirements.	Alternative A includes the use of reclaimed water from the City WWTP if it is made available or use of recycled water from the on-site WWTP to irrigate landscape and for use in toilets. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-4.4: Project Design	The City should encourage project designs that minimize drainage concentrations and impervious surfaces.	Alternative A would include development of only approximately 27 percent of the Twin Cities site, leaving the majority of the site as agricultural	Same as Alternative A	Same as Alternative A

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
		(i.e., impervious). Project design utilizes several features to ensure effective drainage and re-use of stormwater runoff water ( <b>Appendix J</b> ). Therefore, Alternative A is consistent with this policy.		
PFS-4.6: Erosion Control Plan	The City shall require new development projects to prepare an erosion control plan.	Alternative A would include the preparation and implementation of a Storm Water Pollution Prevention Plan that includes erosion control measures and is, in essence, an erosion control plan ( <b>Section 5.2</b> ). Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-4.7: Mitigating Stormwater Runoff	The City shall require projects that have significant impacts on the quantity and quality of surface water runoff to incorporate mitigation measures for impacts related to urban runoff.	Alternative A would not have significant impacts on surface water due to project location, design, and erosion control mitigation measures ( <b>Section 5.2</b> ). Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-6.4: Reducing Crime Through Site Design	The City shall require developers to incorporate best available practices in residential and nonresidential site plan design and construction using principles of Crime Prevention through environmental design, Safescape, eyes-on-the-street design techniques, and related programs in order to minimize criminal activities including vandalism, graffiti, and burglary.	Features such as security cameras and lighting, security guards, and responsible beverage policies will be incorporated into the project design with measures presented in <b>Section 5.10.3</b> . Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
PFS-6.5: Police Facility Funding	The City shall require new development to develop or fund police facilities, equipment, and personnel that, at a minimum, financially support standards identified in Policy PFS-6.4.	Law enforcement impacts from Alternative A are described in <b>Section 4.10</b> , and mitigation detailing funding measures for additional facilities, equipment, and personnel is included in <b>Section 5.10</b> . Therefore, Alternative A is consistent with this policy.		
PFS-11.2: Underground Utility Requirement	The City shall require underground installation of electrical distribution utility lines in new developments and areas that are redeveloped, except where infeasible for operational reasons.	Alternative A would include the installation of underground electrical utility lines, as is standard in modern construction. Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
SS-4.5: Fire	The City shall require all development projects to mitigate	Impacts to fire protection and	Same as Alternative A	Same as Alternative A

Policies	City of Galt Planning Polices	Alternative A	Alternative B	Alternative C
Fighting Resources in Development Plans	fire protection and emergency medical service impacts associated with capital facilities and equipment, including personnel.	emergency medical services would be mitigated through detailing funding measures for additional facilities, equipment, and personnel ( <b>Section 5.10.4</b> ). Therefore, Alternative A is consistent with this policy.		
SS-4.6: Fire Sprinklers	The City shall require sprinkler systems in all new commercial, office, public, and industrial construction, in accordance with City ordinances. The City shall require fire sprinklers in all new residences.	Fire suppression sprinkler systems would be included in all buildings constructed under Alternative A in accordance with the International Building Code ( <b>Section 2.2</b> ). Therefore, Alternative A is consistent with this policy.	Same as Alternative A	Same as Alternative A
Source: City of Galt, 2009.				

## **Agriculture**

Alternative A would result in the direct conversion of approximately 76 acres of farmland on the 282-acre Twin Cities site to a casino/hotel facility. The completed Farmland Conversion Impact Rating (FCIR) Forms for Alternative A is provided in **Appendix V**. According to the Natural Resource Conservation Service (NRCS), the Twin Cities site contains a very small amount of prime farmland and no important, or unique farmland. The prime farmland would not be disturbed as part of the development of the alternative. The Twin Cities site assessment rating has been computed at 100 out of 160. The combined Farmland Protection Policy Act (FPPA) point total for the Twin Cities site is 126 out of 260 possible points, which is lower than the United States Department of Agriculture (USDA) protection threshold of 160 points (**Appendix V**).

As described in **Section 3.9**, Sacramento County General Plan Policy AG-5 requires mitigation for the conversion of over 50 acres of farmland. Under Alternative A, county land use regulations would not apply to the Twin Cities site once the land is taken into trust. Alternative A would result in the conversion of 76 acres of farmland; however, the majority of the site (73 percent) would remain in agriculture. Less than 66 acres would be converted to impervious surfaces. The remainder would be vegetated. Due to the large amount of farmland still present on the site, no significant impact from farmland conversion would occur. Additionally, the 2016 MOU between the Tribe and Sacramento County contains provisions requiring the Tribe to make payments identified specifically for agricultural land conservation (**Appendix B**).

Therefore, as Alternative A is in compliance with FPPA, and based on federal criteria, there would be a less than significant effect to agricultural resources due to conversion of farmland on the Twin Cities site.

### **4.9.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

#### **Land Use**

As with Alternative A, Alternative B would result in approximately 282-acres of land being transferred from fee to federal trust, thereby removing the property from the City SOI planning area and County land use jurisdiction.

Alternative B would be consistent with most goals, objectives, and policies of the County and the City (**Table 4.9-1** and **Table 4.9-2**).

Agricultural operations on adjacent property to the north and west of the Twin Cities site could result in land use compatibility impacts with Alternative B associated with dust and noise from operation of farm equipment and the use of pesticides and other chemical applications. Periodic dust and noise represent a potentially minor annoyance for on-site customers.

Alternative B consists of a casino-resort development similar to Alternative A on the Twin Cities site, however on a reduced scale and without a hotel. Similar to Alternative A, these land uses would replace existing agricultural and open space uses and would differ from adjacent land uses. Alternative B, located in the City's SOI area, would involve commercial development on land that is currently planned for commercial/office professional/industrial in the City 2030 General Plan. Alternative B would be consistent with the planned removal of agricultural designation of the site through the 2030 City General Plan, would not physically disrupt neighboring land uses, would not prohibit access to neighboring parcels, or otherwise significantly conflict with neighboring land uses. Therefore, significant land use effects would not occur.

### **Agriculture**

As with Alternative A, Alternative B would result in the direct conversion of approximately 76 acres of farmland on the Twin Cities to a casino/hotel, of which less than 63 acres would be impervious surfaces. Refer to **Section 4.9.1** and **Appendix V** for FCIR information. Therefore, as Alternative B is in compliance with FPPA, and based on federal standards, a less than significant effect to agricultural resources due to conversion of farmland on the Twin Cities site.

### **4.9.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

#### **Land Use**

As with Alternatives A and B, Alternative C would result in approximately 282-acres of land being transferred from fee to federal trust, thereby removing the property from the City SOI planning area and County land use jurisdiction. County and/or City land use regulations would not apply to the Twin Cities site once the land is taken into trust.

Alternative C would be consistent with most goals, objectives, and policies of the County and the City (**Table 4.9-1** and **Table 4.9-2**).

As with Alternatives A and B, Agricultural operations on adjacent property to the north and west of the Twin Cities site could result in land use compatibility impacts with Alternative C associated with dust and noise from operation of farm equipment and the use of pesticides and other chemical applications. Periodic dust and noise represent a potentially minor annoyance for on-site customers.

Alternative C consists of the construction of a retail complex and parking facilities to be constructed on the north portion of the Twin Cities site. Similar to Alternatives A and B, under Alternative C land uses would replace existing agricultural and open space uses and would differ from adjacent land uses. Alternative C, located in the City's SOI area, would involve commercial development on land that is currently planned for commercial/office professional/industrial in the City 2030 General Plan. The development of Alternative C would be consistent with the planned removal of agricultural designation of the site through the 2030 City General Plan, would not physically disrupt neighboring land uses, would

not prohibit access to neighboring parcels, or otherwise significantly conflict with neighboring land uses. Therefore, significant land use effects would not occur.

## **Agriculture**

As with Alternatives A and B, Alternative C would result in the direct conversion of approximately 76 acres of farmland on the Twin Cities site to a retail facility, of which less than 64 acres would be impervious surfaces. Refer to **Section 4.9.1** and/or **Appendix V** for FCIR information. Refer to **Section 4.9.1** and **Appendix V** for FCIR information. Therefore, as Alternative C is in compliance with FPPA, based on federal standards, a less than significant effect to agricultural resources due to conversion of farmland on the Twin Cities site would occur.

### **4.9.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE**

#### **Land Use**

As discussed in **Section 3.9**, Alternative D would result in approximately 75-acres of land being transferred from fee to federal trust, thereby removing the property from the County land use jurisdiction. County land use regulations would not apply to the Historic Rancheria site once the land is taken into trust. The only applicable land use regulations would be federal and Tribal, as the Historic Rancheria site would be converted to reservation land. The Tribe relies upon the Tribal Council, the governing body of the Tribe, to guide and regulate land use on tribal lands. The Tribal Government desires to work cooperatively with County and State authorities on matters related to land use. Note that consistency or inconsistency with local land use regulations does not by itself constitute an environmental impact. Environmental impacts, such as potential conflicts with neighboring land uses, are discussed below. Alternative D would be consistent with most goals, objectives, and policies of the County (**Table 4.9-3**).

Alternative D would include the development of a casino-hotel facility on the Historic Rancheria site. These land uses would replace existing agricultural and open space uses and would differ from adjacent land uses. Alternative D would involve commercial development on land that is designated as Agricultural-Residential, Agricultural Cropland, and Natural Reserve in the County General Plan. Similarly, as noted in **Section 3.9.2**, land use in the vicinity of the Historic Rancheria site is designated by the County General Plan as Agricultural-Residential, Agricultural Cropland, General Agriculture, and Natural Reserve. Therefore, Alternative D would be inconsistent with the designation of the site.

Development of the Historic Rancheria site has the potential to result in land use compatibility impacts with nearby sensitive receptors as discussed in detail in the other topical sections of this Environmental Impact Statement (EIS).

Agricultural operations on adjacent properties to west of the Historic Rancheria site could result in land use compatibility impacts with Alternative D associated with dust and noise from operation of farm equipment and the use of pesticides and other chemical applications. Periodic dust and noise represent a

**TABLE 4.9-3**  
SACRAMENTO COUNTY GENERAL PLAN CONSISTENCY – ALTERNATIVES D AND E

Sacramento County		Alternatives	
Policies	Sacramento County Planning Polices	Alternative D	Alternative E
LU-15	Planning and development of new growth areas should be consistent with Sacramento County-adopted Habitat Conservation Plans and other efforts to preserve and protect natural resources.	Alternative D does not conflict with any Habitat Conservation Plans.	Same as Alternative D
LU-18	Encourage development that complements the aesthetic style and character of existing development nearby to help build a cohesive identity for the area.	There is minimal existing development in the vicinity of Alternative D.	Same as Alternative D
LU-31	Strive to achieve a natural nighttime environment and an uncompromised public view of the night sky by reducing light pollution	Alternative D is inconsistent with this policy as it would increase the amount of light in the area.	Same as Alternative D
LU-46	Assure that regionally-oriented commercial and office uses and employment concentrations have adequate road access, high frequency transit service and an adequate but efficient supply of parking.	Alternative D is consistent with this policy as it includes site access and parking.	Same as Alternative A.
LU-48	Discourage the establishment and build-out of linear, strip pattern, commercial centers.	Alternative D is consistent with this policy as it is not a strip mall.	Same as Alternative D.
LU-49	Discourage the creation of excessive amounts of retail shopping facilities.	Alternative D is similar to Alternative A, shown in <b>Table 2-1</b> to involve a minimal amount of retail (2,600 square feet).	Alternative E is similar to Alternative B, shown in <b>Table 2-2</b> to involve a minimal amount of retail (2,600 square feet).
LU-102	Ensure that the structural design, aesthetics and site layout of new developments is compatible and interconnected with existing development.	There is minimal existing development near Alternative D.	Same as Alternative D.
Source: Sacramento County, 2011			

potentially minor annoyance for on-site customers. However, with mitigation measures for noise, air quality, transportation, and aesthetic impacts (included in **Section 5.0**), Alternative D would not conflict with neighboring land uses as described in the County General Plan. Therefore, significant land use effects would not occur under Alternative D.

### **Agriculture**

Alternative D would result in the direct conversion of approximately 75 acres of farmland to a casino-resort facility. The completed FCIR Forms for Alternative D is provided in **Appendix V**. According to the NRCS, the Historic Rancheria site contains prime and important farmland if irrigated. The Historic Rancheria site assessment rating has been computed at 81 out of 160. The combined FPPA point total for the Historic Rancheria site is 104 out of 260 possible points, which is lower than the USDA protection threshold of 160 points (**Appendix V**).

As described in **Section 3.9**, Sacramento County General Plan Policy AG-5 requires mitigation for the conversion of over 50 acres of farmland. Under Alternative D, county land use regulations would not apply to the Historic Rancheria site once the land is taken into trust. Alternative D would result in the conversion of 75 acres of farmland; however, less than 42 acres would be converted to impervious surfaces. The remainder would be vegetated. Therefore, as the amount of farmland converted to impervious surface is under 50 acres, Alternative D would not result in a significant impact.

Therefore, Alternative D is in compliance with FPPA; based on federal standards, a less than significant effect to agricultural resources would occur.

### **4.9.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

#### **Land Use**

As with Alternative D, Alternative E would result in approximately 75-acres of land being transferred from fee to federal trust, thereby removing the property from the County land use jurisdiction. County land use regulations would not apply to the Historic Rancheria site once the land is taken into trust. Environmental impacts, such as potential conflicts with neighboring land uses, are discussed below.

As with alternative D, Alternative E would be consistent with most goals, objectives, and policies of the County (**Table 4.9-3**).

Similar to Alternative D, Alternative E would include the development of a casino-resort facility on the Historic Rancheria site; however at a reduced scale. These land uses would replace existing agricultural and open space uses and would differ from adjacent land uses. Alternative E would involve commercial development on land that is designated as Agricultural-Residential, Agricultural Cropland, and Natural Reserve in the County General Plan. Similarly, as noted in **Section 3.9.2**, land use in the vicinity of the Historic Rancheria site is designated by the County General Plan as Agricultural-Residential, Agricultural

Cropland, General Agriculture, and Natural Reserve. Therefore, Alternative E would be inconsistent with the designation of the site.

Development of the Historic Rancheria site has the potential to result in land use compatibility impacts with nearby sensitive receptors as discussed in detail in the other topical sections of this EIS. Agricultural operations on adjacent properties to west of the Historic Rancheria site could result in land use compatibility impacts with Alternative E associated with dust and noise from operation of farm equipment and the use of pesticides and other chemical applications. Periodic dust and noise represent a potentially minor annoyance for on-site customers. However, with mitigation measures for noise, air quality, transportation, and aesthetic impacts (included in **Section 5.0**), Alternative E would not conflict with neighboring land uses as described in the County General Plan. Therefore, significant land use effects would not occur under Alternative E.

## **Agriculture**

As with Alternative D, Alternative E would result in the direct conversion of approximately 75 acres of farmland on the Historic Rancheria site to a casino/hotel, of which less than 39 acres would be impervious surfaces. Refer to **Section 4.9.4** and **Appendix V** for information on the FCIR. Therefore, Alternative E is in compliance with FPPA; based on federal standards, a less than significant effect to agricultural resources would occur.

### **4.9.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

#### **Land Use**

As discussed in **Section 3.9**, Alternative F would result in approximately 36-acres of land being transferred from fee to federal trust, thereby removing the property from the City of Elk Grove (Elk Grove) land use jurisdiction. Elk Grove land use regulations would not apply to the Mall site once the land is taken into trust. The only applicable land use regulations would be federal and Tribal, as the Mall site would be converted to reservation land. The Tribe relies upon the Tribal Council, the governing body of the Tribe, to guide and regulate land use on tribal lands. The Tribal Government desires to work cooperatively with City of Elk Grove, County, and State authorities on matters related to land use. Note that consistency or inconsistency with local land use regulations does not by itself constitute an environmental impact. Environmental impacts, such as potential conflicts with neighboring land uses, are discussed below.

Alternative F would be consistent with most goals, objectives, and policies of Elk Grove (**Table 4.9-4**).

Alternative F would include the development of a casino-resort facility on the Mall site. The Mall site has been partially developed with a large retail facility; however the site currently sits unoccupied and has never been occupied. Alternative F would involve commercial development on land that was originally approved and constructed for retail development and designated as Commercial through the Elk Grove

General Plan. Therefore Alternative F would be consistent with existing approved construction and designated land uses.

**TABLE 4.9-4**  
ELK GROVE GENERAL PLAN CONSISTENCY – ALTERNATIVE F

Policies	City of Elk Grove Planning Polices	Alternative F
LU-1	The City of Elk Grove recognizes the value of using the City’s land use authority to regulate the use of land within the city, the uses which can take place upon lands in Elk Grove, the arrangement of public and private buildings, and the design of public and private development in order to create an attractive, vibrant community which fulfills the goals expressed in this General Plan.	Alternative F is inconsistent with this policy.
LU-7	The City encourages disclosure of potential land use compatibility issues such as noise, dust, odors, etc., in order to provide potential purchasers with complete information to make informed decisions about purchasing property.	Through the EIS process, such issues are disclosed, so Alternative F is consistent with this policy.
LU-35	The City of Elk Grove shall require that new development—including commercial, office, industrial, and residential development— is of high quality and reflects the City’s desire to create a high quality, attractive, functional, and efficient built environment.	Alternative F is consistent with this policy.
LU-36	Signs should be used primarily to facilitate business identification, rather than the advertisement of goods and services. Sign size limits and locations should be designated consistent with this policy.	Alternative F is inconsistent with this policy.

Source: City of Elk Grove, 2009.

Furthermore, Alternative F would be largely consistent with the Lent Ranch Special Planning Area (LRSPA) that designated the Mall site for commercial uses, most surrounding land uses designated as Commercial, Commercial/Office, Commercial/Office/Multi-Family, Medium Density Residences, Low Density Residences in the Elk Grove General Plan. Therefore, Alternative F would not physically disrupt neighboring land uses, would not prohibit access to neighboring parcels, or otherwise significantly conflict with neighboring land uses. Thus, significant land use effects would not occur.

**Agriculture**

Because the Mall site has been partially developed with a large retail facility, Alternative F would not convert farmland into a casino-resort facility. Therefore, no adverse effects to agricultural resources would occur.

**4.9.7 ALTERNATIVE G – NO ACTION**

Under the No Action alternative, development of the Twin Cities and Historic Rancheria Mall sites in the short-term is not reasonably foreseeable. Current land uses would continue to exist on the Twin Cities and Historic Rancheria sites. No impacts associated with land use and agricultural resources would occur to these two sites. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts to land use would occur as with Alternative F as a result of the No Action alternative.

## 4.10 PUBLIC SERVICES

This section identifies the effects to public services that would result from the development of each alternative described in **Section 2.0**. Indirect and cumulative effects are identified in **Section 4.14** and **Section 4.15**, respectively. If warranted, measures to mitigate for adverse effects are presented in **Section 5.10**. Effects are measured against the environmental baseline presented in **Section 3.10**. An adverse effect would occur if project-related demands on public services would cause an exceedance of system capacities that result in significant effects to the physical environment.

### 4.10.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Water Supply

The estimated average daily water consumption for Alternative A (including landscaping and irrigation) would be approximately 295,000 gallons per day (gpd). Should an on-site wastewater treatment plant (WWTP) be developed (Wastewater Option 1), recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand (**Appendix I**). Alternative A would receive water either from on-site (Option 1) or off-site (Option 2) sources. Refer to **Section 2.2.5** for a further discussion of water supply options under Alternative A.

#### *On-Site Water Supply (Option 1)*

Alternative A Water Supply Option 1 would include the development of an on-site water supply system using on-site groundwater wells for potable use, irrigation, and fire protection. The on-site system is described in **Section 2.2.5**. The impacts to water resources, including groundwater supply, associated with Water Supply Option 1 are discussed in **Section 4.3**. No municipal water systems would be affected by Water Supply Option 1 as no connections are proposed and the use of groundwater for on-site purposes would continue on the Twin Cities site.

#### *Off-Site Water Supply (Option 2)*

The Wilton Rancheria (Tribe) has expressed its intent to contract with the City of Galt (City) for water supply and pay the expenses associated with service to the Twin Cities site. Under Water Supply Option 2, a connection to the City water distribution system would be built. As described in **Section 3.10**, the City groundwater supply wells currently have capacities ranging from 550 to 1,800 gallons per minute (gpm) with the total well capacity of approximately 8,900 gpm and nine million gallons of storage capacity (City of Galt, 2009b). There is a planned expansion to the City's water supply system, currently near capacity, to serve the City's adopted SOI, which includes the Twin Cities site. The expanded water system that would serve the area is consistent with Phase 4 of the City of Galt's 2010 Water Distribution System Master Plan, and includes three wells, a water treatment system, and a storage tank on Bergeron Road, located north of Twin Cities Road (**Appendix I**). Demand for groundwater at the Twin Cities site could also be reduced by using recycled water from the City WWTP.

Planned city water system improvements are identified in the 2010 Urban Water Management Plan (City of Galt, 2013) and are described in **Section 2.2.5**. The planned water facilities that would serve the Twin Cities site and surrounding area include three wells (with a combined capacity of 4,200 gpm), a 4,200 gpm water treatment system, and a three million gallon storage tank on Bergeron Road, located southeast of the Twin Cities site. This anticipated water system expansion is included in the Water Distribution System Master Plan (City of Galt, 2010). The City also typically provides fire protection flows up to 3,000 gallons per minute (gpm) for commercial applications, consistent with the 2013 California Fire Code (**Appendix I**).

A significant effect to city water supply distribution facilities would occur as a result of the need to provide service to Alternative A. Mitigation measures are provided in **Section 5.10.1** to ensure that adequate funding for water supply facilities are made prior to the operation of Alternative A. With mitigation measures, the impact would be less than significant.

### **Wastewater Service**

The projected average daily wastewater flow for Alternative A would be approximately 231,000 gpd with peak flows estimated at 308,000 gpd. As described in **Section 2.2.5**, Alternative A could develop on-site wastewater utilities (Option 1) or tie into the City's WWTP via a proposed pipeline (Option 2).

#### ***On-Site Wastewater Treatment and Disposal (Option 1)***

Wastewater Option 1 would include the development of an on-site WWTP for treatment of wastewater generated under Alternative A. Reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation. No municipal wastewater systems would be affected by Wastewater Option 1 as no connections are proposed.

#### ***Off-Site Wastewater Treatment and Disposal (Option 2)***

Under Wastewater Option 2, the Twin Cities site would connect to the City's existing wastewater collection system and treatment facility. Wastewater would flow by gravity to a pump station near the northwest corner of the Twin Cities site and then be pumped off-site through a force main. Force main connection options include the extension of a direct force main to the City's WWTP or the development of a force main which would connect to a proposed City 18-inch main located to the south of the development area. This option is described in **Section 2.2.5** and detailed in **Appendix I**. Upon connection, the Tribe would pay the current capital connection charges and monthly service fees, consistent with any other commercial development, as described in **Section 5.10**.

The City of Galt's WWTP currently treats an average of approximately 2.3 million gallons per day (MGD) of wastewater, with existing capacity at 3.0 MGD, with a planned expansion to the WWTP increasing capacity to 4.5 MDG by 2020. The 0.7 MGD of available capacity at the City of Galt's WWTP would accommodate the wastewater demands of Alternative A.

However, due to the lack of an existing service agreement and the need to develop a connection, a potentially significant impact to the City's sewer system and WWTP would occur, and therefore mitigation is included in **Section 5.10.1**. With implementation of mitigation, the impacts to the City's wastewater services would be reduced to a minimal level.

## **Solid Waste Service**

### ***Construction***

Construction of the casino and hotel under Alternative A would result in a temporary increase in generation of solid waste. Potential solid waste streams from construction would include paper, wood, glass, aluminum, and plastics from packing materials; waste lumber; insulation; empty non-hazardous chemical containers; concrete; metal, including steel from welding/cutting operations; and electrical wiring.

Construction waste that cannot be recycled would be collected by a hauling company and disposed of at the Kiefer Landfill or other permitted landfills that accept construction and demolition material. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the temporary increase in waste generated by the construction of Alternative A (Cal-Recycle, 2014). Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

### ***Operation***

As described in **Section 3.10**, the Twin Cities site is located within the service boundaries of the County Municipal Services Agency, Department of Waste Management and Recycling (County DWMR), but service is mostly provided by private hauling companies. The private hauling companies are under franchise agreement with the County DWMR to perform collection and disposal at properties and convey waste to landfills and recycling stations, as appropriate. Waste generated under Alternative A would be hauled appropriately to facilities described in **Section 3.10**.

The California Integrated Waste Management Board (CIWMB) has established waste generation rates for the operation of different business types and residences. The rate is expressed as tons per employee per year. Based on the generation rates of similar gaming facilities, it is estimated that Alternative A would generate approximately 2.88 tons per day or 5,769 tons per year of solid waste (**Table 4.10-1**).

Landscaping and maintenance staff would pick up trash that is left on the property. Decorative receptacles for trash and recycling would be placed strategically throughout the casino, hotel, and associated facilities to discourage littering. As discussed above, waste that cannot be recycled will be disposed of at the Kiefer Landfill or another permitted facility. The Kiefer Landfill has a permitted capacity of 10,815 tons per day or 3.94 million tons per year, and has nearly 113 million cubic yards of available capacity. It has sufficient capacity to maintain operations through 2064 (Cal-Recycle, 2014).

**TABLE 4.10-1**  
ESTIMATED SOLID WASTE DISPOSAL – ALTERNATIVE A

Waste Generation Source	Waste Generation Rate <sup>1</sup>	Units	Value	Total Waste (lb/day)
Hotel	2	lb/room/day	302	<b>604</b>
Casino (other services)	3.12	lb/100 sf/day	110,260	<b>3,440</b>
Restaurant	0.005	lb/sf/day	44,500	<b>222.5</b>
Convention Center	3.12	lb/100 sf/day	48,150	<b>1,502</b>
<b>Total lb/day</b>				<b>5,768.89</b>
<b>Total ton/day</b>				<b>2.88</b>
<b>Total ton/year</b>				<b>1,052.82</b>
<b>Total cy/year</b>				<b>6,580</b>
Source: Cal-Recycle, 2014				

The Alternative A solid waste stream would represent approximately 0.0002 percent of the daily and yearly capacity of the Kiefer Landfill.

Therefore, operation of Alternative A would not result in significant effects on solid waste services. Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of solid waste disposed of at the landfill and ensure impacts remain less than significant.

## Law Enforcement

An analysis of the impact of casino gambling on local crime rates is included in **Section 4.7**. While there is no definitive link between casinos and crime it is anticipated that the increased concentration of people that Alternative A would bring to the Twin Cities site would lead to an increase in the number of service calls to local law enforcement. Analysis presented in **Appendix N** quantifies this increase, based on number of gaming positions, to be 471 annual incident calls, 27 percent of which are expected to lead to arrest, for a total of 125 arrests per year (refer **Appendix N**).

As discussed in **Section 2.2.5**, law enforcement services would be provided by the Sacramento County Sheriff's Department (SCSD) and/or the City of Galt Police Department (GPD), while prosecution and court and jail services would be provided by the SCSD. A Tribal security force would provide security patrol and monitoring needs of the casino as needed. Security cameras and security personnel would provide surveillance of the casino, parking areas, and surrounding grounds. Security guards would patrol the facilities to reduce and prevent criminal and civil incidents. Security guards would carry two-way radios to request and respond to back up or emergency calls. Tribal security personnel would work cooperatively with other law enforcement agencies. The need for GPD or SCSD assistance would likely be required only in situations where a serious threat to life or property is present, or if arrests are necessary.

GPD and/or SCSD may require additional facilities, equipment, and staffing to meet the increased need for services under Alternative A; however, due to the relatively low number of expected calls for service, as well as interviews summarized in **Appendix N**, this is unlikely. Due to the potential for an increase in calls for service during operation of Alternative A and extended hours of operation at the Twin Cities site, a potentially significant adverse effect could occur. Recurring quarterly payments are required by the 2016 MOU with Sacramento County to address potential crime impacts and fund an expansion of law enforcement services (**Appendix B**). Additionally, an increase in service demands to the California Highway Patrol (CHP) may result from development of Alternative A. However, payments to the State would offset any impacts to the CHP.

With implementation of the on-site security measures and the mitigation **Section 5.10.3**, impacts would be addressed and Alternative A would result in a less than significant effect on public law enforcement services.

### ***Criminal Jurisdiction***

In 1963, the State of California assumed partial jurisdiction over certain offenses occurring in Indian country pursuant to Public Law 83-280 (PL 280). As a consequence, the trust acquisition would result in changes in criminal jurisdiction on the Twin Cities site dependent on whether victims or the accused are Native American. For future criminal matters at the casino consisting of crimes by non-Indians against other non-Indians, California would continue to exercise criminal jurisdiction. Accordingly, changes in criminal jurisdiction would not be significant.

## **Fire Protection and Emergency Medical Services**

### ***Construction***

Construction may introduce potential sources of fire to the Twin Cities site. During construction, equipment and vehicles may accidentally spark and ignite vegetation. Equipment used during grading and construction activities may also create sparks which could ignite dry grass on the site. This risk would be similar to that found at other construction sites and is considered potentially significant. Mitigation measures are presented in **Section 5.10.4** to address this potential impact and reduce impacts to less than significant levels. The Tribe and the Cosumnes Community Service District Fire Department (CCSD Fire Department) have entered into a letter of intent for the provision of fire and emergency services (**Appendix E**). This letter of intent is the first step in forming a memorandum of understanding (MOU) and/or a services agreement.

### ***Operation***

After development of Alternative A, the Cosumnes Community Service District Fire Department (CCSD Fire Department) would continue to provide fire suppression services to the Twin Cities site. Development of the casino/hotel structure would create additional risks from fires and add to firefighting responsibilities in the area. Vegetation in and around the developed areas would be minimal and irrigated

during dry months, thereby minimizing the risk of fire. Additionally, the timely detection of fires by individuals working in the casino, early intervention, and firebreaks created by driveways and roads would reduce the risk of fires. Pursuant to building code requirements included in the anticipated Tribal-State Compact, the casino structure would be constructed to meet International Building Code (IBC) design requirements, and the facilities would be constructed to meet adequate fire flow requirements as discussed in the water supply section above.

Due to the potential for an increase in calls for fire protection services during operation of Alternative A and the extended hours of operation at the Twin Cities site, a potentially significant impact to the CCSF Fire Department could occur. With implementation of mitigation in **Section 5.10.4**, impacts would be addressed, and Alternative A would result in a less than significant effect on public fire protection services.

The CCSF Fire Department also provides first responder emergency medical service through paramedic staffing on ambulances and engines. Due to the volume of patrons and employees at the facility, this would be a significant impact. First responder and ambulance service would be provided to the casino resort via a service agreement as noted in **Section 5.10.4**.

The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 12 miles north of the Twin Cities site. Because hospital services are adequate in the area, this would be a less than significant impact.

## **Electricity, Natural Gas, and Other Utilities**

### ***Construction***

Construction on the Twin Cities site could damage underground utilities, leading to outages and/or serious injury. This would result in an adverse effect. Mitigation measures are presented in **Section 5.10.5** to reduce impacts to less than significant.

### ***Operation***

Electricity would be obtained from Sacramento Municipal Utility District (SMUD), which currently has a 69kV power line adjacent to the eastern edge of the Twin Cities site along West Stockton Boulevard. A small substation would be placed adjacent to the existing power line to provide electricity for Alternative A. The estimated electrical connected load for Alternative A is 12.5 megawatts (MW) and the estimated demand load is 8.12 MW (JBA Consulting Engineers, 2015). The adjacent electrical lines are shown in **Figure 2-3**. Mitigation in **Section 5.10.5** would address the cost of the substation and reduce this impact to a less than significant level.

The estimated natural gas connected peak demand for Alternative A is 25,000 cubic feet per hour (CFH) (JBA Consulting Engineers, 2015). Natural gas service is not currently available at the site, however it

could be provided via an extension of a nearby 6-inch diameter. Pacific Gas and Electric Company (PG&E) gas pipeline. PG&E has indicated that service capacity is available for the site and surrounding properties included in the City SOI area (City of Galt, 2009a). The Tribe could contract with PG&E, a private service provider, to extend natural gas service to the site from the 6-inch line located at the intersection of Twin Cities Road and Bergeron Road. **Figure 2-3** shows the proposed pipeline extension route. Alternatively, the Tribe could use power sources such as propane or electricity for Alternative A. If a connection to the PG&E natural gas delivery system is built, the impact to natural gas services would be insignificant as capacity is available.

Several private companies provide telephone, internet, and cable services to properties within the vicinity of the Twin Cities site. Prominent companies that offer these services include Comcast and AT&T. The Tribe would utilize these or similar service providers. Several companies have the capacity to provide Alternative A with adequate telecommunication services. Therefore, providing telephone and cable services to the site would not be a significant impact as the Tribe intends to provide their portion of the necessary funding for the installation and operation of services.

Implementation of Alternative A would result in a less than significant impact to electricity, natural gas, and telecommunications services and demand. Nonetheless, mitigation measures have been identified in **Section 5.10.5** to further reduce the energy demands and ensure adequate services for, Alternative A.

#### **4.10.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

##### **Water Supply**

The estimated average daily water consumption for Alternative B (including landscaping and irrigation) would be approximately 227,000 gpd (**Appendix I**). The development options for water supply are identical to those described under Alternative A. The water supply options are described in **Section 2.3.1** and detailed in **Appendix I**. As with Alternative A, two water supply options are included under Alternative B. Should an on-site WWTP be developed, recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand (**Appendix I**).

##### ***On-Site Water Supply (Option 1)***

As with Alternative A, Alternative B's Water Supply Option 1 would include the development of an on-site water supply system using on-site groundwater wells for domestic use, emergency supply, and fire protection. The on-site system is described in **Section 2.3.1** and detailed in **Appendix I**. The impacts to water resources, including groundwater supply, associated with Water Supply Option 1 are discussed in **Section 4.3**. No municipal water systems would be affected by Water Supply Option 1 as no connections are proposed and the use of groundwater for on-site purposes would continue on the Twin Cities site.

***Off-Site Water Supply (Option 2)***

The Tribe has expressed its intent to contract with the City for water supply and pay the expenses associated with service to the Twin Cities site. Under Water Supply Option 2, a connection to the City water distribution system would be built. As described in **Section 4.10.1**, there is a planned expansion to the City's water supply system, currently near capacity, to serve the City's adopted Sphere of Influence, which includes the Twin Cities site. Planned city water system improvements are described in **Section 2.3.1** and detailed in **Appendix I**. Demand for groundwater at the Twin Cities site could also be reduced by using recycled water from the City WWTP.

As with Alternative A, a significant effect to city water supply distribution facilities would occur as a result of the need to provide service to Water Supply Option 2. Mitigation measures are provided in **Section 5.10.1** to ensure that an adequate water supply is available for the operation of Alternative B, and for the necessary fire flows. With mitigation measures, the impact would be less than significant.

**Wastewater Service**

The projected average daily wastewater flow for Alternative B would be approximately 154,000 gpd, with peak flows estimated at 205,000 gpd. Alternative B could tie into the City's WWTP via a proposed pipeline or develop on-site wastewater utilities similar to Alternative A. This treatment and disposal system is described in **Section 2.3.1** and detailed within the Water and Wastewater Feasibility Study (**Appendix I**).

***On-Site Wastewater Treatment and Disposal (Option 1)***

Wastewater Option 1 would include the development of an on-site WWTP for treatment of wastewater generated under Alternative B. Treated effluent from the on-site WWTP would be discharged through sub-surface disposal, or through a combination of spray disposal and sub-surface disposal. Reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation. No municipal wastewater systems would be affected by Wastewater Option 1 as no connections are proposed.

***Off-Site Wastewater Treatment and Disposal (Option 2)***

Under Wastewater Option 2, the Twin Cities site would tie into the City's WWTP via a proposed pipeline. On-site connection points and the off-site pipeline routes are identical to those described under Alternative A. This option is described in **Section 2.3.1** and detailed in **Appendix I**. Upon connection, the Tribe would pay the current capital connection charges and monthly service fees, consistent with any other commercial development.

As discussed in **Section 4.10.1**, the City's WWTP currently treats an average of approximately 2.3 MGD of wastewater, with existing capacity at 3.0 MGD, with a planned expansion to the WWTP increasing

capacity to 4.5 MGD by 2020. The 0.7 MGD of available capacity at the City of Galt's WWTP would accommodate the wastewater demands of Alternative B.

However, due to the lack of an existing service agreement, a potentially significant impact to the City's sewer system and WWTP would occur, and therefore mitigation is included in **Section 5.10.1**. With implementation of mitigation, the impacts to the City's wastewater services would be reduced to a minimal level.

## **Solid Waste Service**

### ***Construction***

As with Alternative A, construction of the casino under Alternative B would result in a temporary increase in generation of solid waste. Construction waste that cannot be recycled would be collected by a hauling company, and disposed of at the Kiefer Landfill, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative B (Cal-Recycle, 2014). Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

### ***Operation***

As with Alternative A, Alternative B is located within the boundaries of the County DWMR, but most service is provided by private hauling companies. Waste generated under Alternative B would be hauled appropriately to facilities described in **Section 3.10**.

Based on the generation rates of similar gaming facilities, it is estimated that Alternative B would generate approximately 1.82 tons per day and 666 tons per year of solid waste (**Table 4.10-2**). Landscaping and maintenance staff would pick up any trash that is left on the property. Decorative receptacles for trash and recycling would be placed strategically throughout the casino, hotel, and associated facilities to discourage littering. As discussed above, waste that cannot be recycled will be disposed of at the Kiefer Landfill or another permitted facility.

The Kiefer Landfill has a permitted capacity of 10,815 tons per day, and has nearly 113 million cubic yards of available capacity. It has sufficient capacity to maintain operations through 2064 (Cal-Recycle, 2014). Alternative B would represent approximately 0.0001 percent of the daily and yearly capacity of the landfill. Therefore, as with Alternative A, the operation of Alternative B would not result in significant effects on solid waste services. Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of solid waste disposed of at the landfill and ensure impacts remain less than significant.

**TABLE 4.10-2**  
ESTIMATED SOLID WASTE DISPOSAL – ALTERNATIVE B

Waste Generation Source	Waste Generation Rate <sup>1</sup>	Units	Value	Total Waste (lb/day)
Casino (other services)	3.12	lb/100 sf/day	110,260	<b>3,440</b>
Restaurant	0.005	lb/sf/day	42,300	<b>211.5</b>
<b>Total lb/day</b>				<b>3,651</b>
<b>Total ton/day</b>				<b>1.82</b>
<b>Total ton/year</b>				<b>666.4</b>
<b>Total cy/year</b>				<b>4,165.2</b>
Source: Cal-Recycle, 2014				

## Law Enforcement

An analysis of the impact of casino gambling on local crime rates is included in **Section 4.7**.

As with Alternative A, law enforcement services under Alternative B would be provided by the SCSD and/or the GPD, while prosecution and court and jail services would be provided by the SCSD (refer to **Section 2.3.1**). A Tribal security force would provide security patrol and monitoring needs of the casino as needed. Tribal security personnel would work cooperatively with the GPD and SCSD. The need for GPD or SCSD assistance would likely be required only in situations in which there were a serious threat to life and property and during which arrests would be made.

GPD and/or SCSD may require additional facilities, equipment, and staffing to meet the increased need for services under Alternative B, though, as with Alternative A, the increase is expected to be minimal. Also, due to the potential for an increase in calls for service during operation of Alternative B and extended hours of operation at the Twin Cities site, a potentially significant adverse effect could occur. Additionally, an increase in service demands to the CHP may result from development of the project. However, payments to the State under the Tribal-State compact would offset any impacts to the CHP.

With implementation of the on-site security measures and the mitigation discussed in **Section 5.10.3**, impacts would be addressed and Alternative B would result in a less than significant effect on public law enforcement services.

## Fire Protection and Emergency Medical Services

### **Construction**

As discussed in **Section 4.10.1**, construction may introduce potential sources of fire to the Twin Cities site. This risk would be similar to that found at other construction sites and is considered potentially significant. Mitigation measures are presented in **Section 5.10.4** to address this potential impact and reduce impacts to less than significant levels.

### ***Operation***

As with Alternative A, after development of Alternative B the CCSD Fire Department would continue to provide fire suppression services to the Twin Cities site. As discussed in **Section 4.10.1**, development of the casino structure would create additional risks from fires and add to firefighting responsibilities in the area. Due to the potential for an increase in calls for fire protection services during operation of Alternative B and the extended hours of operation at the Twin Cities site, a potentially significant impact to the CCSD Fire Department could occur. With implementation of the mitigation discussed in **Section 5.10.4**, impacts would be addressed, and Alternative B would result in a less than significant effect on public fire protection services.

The CCSD Fire Department also provides first responder emergency medical service through paramedic staffing on ambulances and engines. Due to the volume of patrons and employees at the facility, this would be a significant impact. First responder and ambulance service would be provided to the casino resort via a service agreement, as noted in **Section 5.10.4**.

The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 12 miles north of the Twin Cities site. Because hospital services are adequate in this area, this would be a less than significant impact.

## **Electricity, Natural Gas, and Other Utilities**

### ***Construction***

Construction on the Twin Cities site could damage underground utilities, leading to outages and/or serious injury. This would result in an adverse effect. Mitigation measures are presented in **Section 5.10.5** to reduce impacts to less than significant.

### ***Operation***

As with Alternative A, electricity under Alternative B would be obtained from SMUD, which currently provides electricity to the Twin Cities site. Refer to **Section 4.10.1** for a further discussion of SMUD's service in the vicinity of the Twin Cities site. Mitigation in **Section 5.10.5** would reduce impacts associated with electricity service to a less than significant level.

Natural gas service is not currently available at the site. As with Alternative A, the nearest 6-inch diameter natural gas line is located east of Highway 99, as shown on **Figure 2-3**. Refer to **Section 4.10.1** for a further discussion of PG&E service capability. As with Alternative A, if a connection to natural gas lines is developed under Alternative B, the impact to natural gas services would be less than significant as capacity is available.

Several private companies provide telephone, internet, and cable services to properties within the vicinity of the Twin Cities site. Refer to **Section 4.10.1** for a further discussion of telecommunication companies.

As with Alternative A, the development of telephone and cable services on the site under Alternative B is not expected to be a significant impact.

As with Alternative A, implementation of Alternative B would result in a less than significant impact to electricity, natural gas, and telecommunications services and demand. Nonetheless, mitigation measures have been identified in **Section 5.10.5** to further reduce the energy demand of, and ensure adequate services for, Alternative B.

### **4.10.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

#### **Water Supply**

The estimated average daily water consumption for Alternative C (including landscaping and irrigation) would be approximately 158,000 gpd (**Appendix I**). The development options for water supply are identical to those described under Alternative A. The water supply options are described in **Section 2.4.1** and detailed in **Appendix I**. As with Alternatives A and B, two water supply options are included under Alternative C. Should an on-site WWTP be developed, recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand.

#### ***On-Site Water Supply (Option 1)***

As with Alternatives A and B, Alternative C's Water Supply Option 1 would include the development of an on-site water supply system using on-site groundwater wells for domestic use, emergency supply, and fire protection. The on-site system is described in **Section 2.4.1** and detailed in **Appendix I**. The impacts to water resources, including groundwater supply, associated with Water Supply Option 1 are discussed in **Section 4.3**. No municipal water systems would be affected by Water Supply Option 1 as no connections are proposed and the use of groundwater for on-site purposes would continue on the Twin Cities site.

#### ***Off-Site Water Supply (Option 2)***

As with Alternatives A and B Water Supply Option 1, the Tribe has expressed its intent to contract with the City for water supply and pay the expenses associated with service to the Twin Cities site. Under Water Supply Option 2, a connection to the City water distribution system would be built. As described in **Section 4.10.1**, there is a planned expansion to the City's water supply system, currently near capacity, to serve the City's adopted SOI, which includes the Twin Cities site. Planned city water system improvements are described in **Section 2.4.1** and detailed in **Appendix I**. Demand for groundwater at the Twin Cities site could also be reduced by using recycled water from the City WWTP.

As with Alternatives A and B, a significant effect to city water supply distribution facilities would occur as a result of the need to provide service to Water Supply Option 2. Mitigation measures are provided in **Section 5.10.1** to ensure that an adequate water supply is available for the operation of Alternative C and the necessary fire flows. With mitigation measures the impact would be less than significant.

## **Wastewater Service**

The projected average daily wastewater flow for Alternative C would be approximately 104,000 gpd, with peak flows estimated at 138,000 gpd. Alternative C could tie into the City's WWTP via a proposed pipeline or develop on-site wastewater utilities be similar to Alternative A. This treatment and disposal system is described in **Section 2.4.1** and detail under Alternative A and within the Water and Wastewater Feasibility Study (**Appendix I**).

### ***On-Site Wastewater Treatment and Disposal (Option 1)***

Wastewater Option 1 would include the development of an on-site WWTP for treatment of wastewater generated under Alternative C. Treated effluent from the on-site WWTP would be discharged through sub-surface disposal, or through a combination of spray disposal and sub-surface disposal. Reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation. No municipal wastewater systems would be affected by Wastewater Option 1 as no connections are proposed.

### ***Off-Site Wastewater Treatment and Disposal (Option 2)***

As with Alternatives A and B, Wastewater Option 2 would tie the Twin Cities site into the City's WWTP via a proposed pipeline. On-site connection points and the off-site pipeline routes are identical to those described under Alternative A. This option is described in **Section 2.4.1** and detailed in **Appendix I**. Upon connection, the Tribe would pay the current capital connection charges and monthly service fees, consistent with any other commercial development.

As discussed in **Section 4.10.1**, the City's WWTP currently treats an average of approximately 2.3 MGD of wastewater, with existing capacity at 3.0 MGD, with a planned expansion increasing capacity to 4.5 MGD by 2020. The 0.7 MGD of available capacity at the City of Galt's WWTP would accommodate the wastewater demands of Alternative B.

However, due to the lack of an existing service agreement, a potentially significant impact to the City's sewer system and WWTP would occur, and therefore mitigation is included in **Section 5.10.1**. With implementation of mitigation, the impacts to the City's wastewater services would be reduced to a minimal level.

## **Solid Waste Service**

### ***Construction***

As with Alternative A and B, construction of the casino under Alternative C would result in a temporary increase in generation of solid waste. Construction waste that cannot be recycled would be collected by a hauling company and disposed of at the Kiefer Landfill, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate

capacity to accommodate the increase in the amount of waste generated by the construction of Alternative C (Cal-Recycle, 2014). Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

**Operation**

Similar to Alternatives A and B, it is anticipated that the Tribe will enter a future agreement with the County DWMR and CWRS to provide solid waste services to the Twin Cities site under Alternative C. Waste generated under Alternative C would be hauled appropriately to facilities described in **Section 3.10**.

Based on the generation rates of similar gaming facilities, it is estimated that Alternative C would generate approximately 3.87 tons per day or 1,412 tons per year of solid waste (**Table 4.10-3**). Landscaping and maintenance staff would pick up any trash that is left on the property. Decorative receptacles for trash and recycling would be placed strategically throughout the casino, hotel, and associated facilities to discourage littering. As discussed above, waste that cannot be recycled will be disposed of at the Kiefer Landfill or another permitted facility. The Kiefer Landfill has a permitted capacity of 10,815 tons per day, and has 113 million cubic yards of available capacity. It has sufficient capacity to maintain operations through 2064 (Cal-Recycle, 2014). Alternative C would represent approximately 0.0003 percent of the daily and yearly landfill capacity.

**TABLE 4.10-3**  
ESTIMATED SOLID WASTE DISPOSAL – ALTERNATIVE C

Waste Generation Source	Waste Generation Rate <sup>1</sup>	Units	Value	Total Waste (lb/day)
Commercial Retail	2.5	lb/ksf/day	455,000	1137.5
Supermarket	3.12	lb/100 sf/day	200,000	6240
Restaurant	0.005	lb/sf/day	23,000	115
Other Services (Gas Station)	3.12	lb/sf/day	8,000	249.6
<b>Total lb/day</b>				<b>7,742.1</b>
<b>Total ton/day</b>				<b>3.871</b>
<b>Total ton/year</b>				<b>1,412.933</b>
<b>Total cy/year</b>				<b>88,30.83</b>
Source: Cal-Recycle, 2014				

Therefore, as with Alternatives A and B, the operation of Alternative C would not result in significant effects on solid waste services. Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of solid waste disposed of at the landfill and ensure impacts remain less than significant.

## **Law Enforcement**

As described in **Section 2.4.1**, law enforcement services under Alternative C would be provided by the SCSD and/or the GPD, while prosecution and court and jail services would be provided by the SCSD. A Tribal security force would provide security patrol and monitoring needs of the retail facility. Tribal security personnel would work cooperatively with the GPD and SCSD. The need for GPD or SCSD assistance would likely be required only in situations in which there were a serious threat to life and property and during which arrests would be made.

GPD and/or SCSD may require additional facilities, equipment, and staffing to meet the increased need for services under Alternative C, though, like Alternative A, the increase is expected to be minimal. Also, due to the potential for an increase in calls for service during operation of Alternative C and extended hours of operation at the Twin Cities site, a potentially significant adverse effect could occur. Additionally, an increase in service demands to the CHP may result from development of the project. However, payments to the State under the Tribal-State compact would offset any impacts to the CHP.

With implementation of the on-site security measures and the mitigation discussed in **Section 5.10.3**, impacts would be addressed, and Alternative C would result in a less than significant effect on public law enforcement services.

## **Fire Protection and Emergency Medical Services**

### ***Construction***

As discussed in **Section 4.10.1**, construction may introduce potential sources of fire to the Twin Cities site. This risk would be similar to that found at other construction sites and is considered potentially significant. Mitigation measures are presented in **Section 5.10.4** to address this potential impact and reduce impacts to less than significant levels.

### ***Operation***

As with Alternatives A and B, after development of Alternative C the CCSD Fire Department would continue to provide fire suppression services to the Twin Cities site under the operation of Alternative C. As discussed in **Section 4.10.1**, development of the retail structure would create additional risks from fires and add to firefighting responsibilities in the area. Due to the potential for an increase in calls for fire protection services during operation of Alternative C and the extended hours of operation at the Twin Cities site, a potentially significant impact to the CCSD Fire Department could occur. With implementation of the mitigation discussed in **Section 5.10.4**, impacts would be addressed, and Alternative C would result in a less than significant effect on public fire protection services.

The CCSD Fire Department also provides first responder emergency medical service through paramedic staffing on ambulances and engines. Due to the volume of patrons and employees at the facility, this

would be a significant impact. First responder and ambulance service would be provided to the casino resort via a service agreement, as noted in **Section 5.10.4**.

The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 12 miles north of the Twin Cities site. Because hospital services are adequate in this area, this would be a less than significant impact.

## **Electricity, Natural Gas, and Other Utilities**

### ***Construction***

Construction on the Twin Cities site could damage underground utilities, leading to outages and/or serious injury. This would result in an adverse effect. Mitigation measures are presented in **Section 5.10.5** to reduce impacts to less than significant.

### ***Operation***

As with Alternatives A and B, electricity under Alternative C would be obtained from SMUD, which currently provides electricity to the Twin Cities site. Refer to **Section 4.10.1** for a further discussion of SMUD's service in the vicinity of the Twin Cities site. Mitigation in **Section 5.10.5** would reduce this impact to a less than significant level.

Natural gas service is not currently available at the site. Refer to **Section 4.10.1** for a discussion of PG&E service capability. As with Alternatives A and B, if a connection to natural gas lines is developed under Alternative C, the impact to natural gas services would not be significant as capacity is available.

Several private companies provide telephone, internet, and cable services to properties within the vicinity of the Twin Cities site. Refer to **Section 4.10.1** for a further discussion of telecommunication companies. As with Alternative A and B, the development of telephone and cable services on the site under Alternative B is not expected to be a significant impact.

As with Alternatives A and B, implementation of Alternative C would result in a less than significant impact to electricity, natural gas, and telecommunications services and demand. Nonetheless, mitigation measures have been identified in **Section 5.10.5** to further reduce the energy demand of, and ensure adequate services for, Alternative C.

## **4.10.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE**

### **Water Supply**

The estimated average daily water consumption for Alternative D (including landscaping and irrigation) would be approximately 362,000 gpd (**Appendix I**). Through the development of an on-site WWTP,

recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand (**Appendix I**).

The Tribe would implement the on-site water system recommendations contained in the Water and Wastewater Study (**Appendix I**), which are identical to those discussed under Alternative A. In addition, wellhead treatment should be installed for any water quality constituent that exceeds EPA or the Department of Health Services regulatory standards for drinking water. Components of the on-site water supply system would include two on-site wells, a treatment plant, a 371,000 gallon water storage tank, and an internal distribution system. The on-site system is described in **Section 2.5.2** and detailed in **Appendix I**.

The impacts to water resources, including groundwater supply, associated with Alternative D are discussed in **Section 4.3**. No municipal water systems would be affected by Alternative D as no connections are proposed and the use of groundwater for on-site purposes would continue on the Historic Rancheria site.

### **Wastewater Service**

The projected average daily wastewater flow for Alternative D would be approximately 229,000 gpd with peak flows estimated at 305,000 gpd. Alternative D wastewater treatment and disposal would be provided by the development of an on-site WWTP and a treated effluent discharge point to the Cosumnes River. The proposed treatment and disposal facility would provide for the use of reclaimed water for casino toilet flushing and landscape irrigation. The on-site wastewater system is described in **Section 2.5.2** and detailed in **Appendix I**. To accommodate the projected peak flow from the casino development, the WWTP capacity would be 385,000 gpd. A recycled water tank with a capacity of approximately 220,000 gallons and a 200,000 gallon effluent disposal tank would additionally be developed to store treated wastewater.

The impacts to water resources associated with Alternative D wastewater service are discussed in **Section 4.3**. No municipal wastewater systems would be affected by Alternative D as no connections are proposed.

### **Solid Waste Service**

#### ***Construction***

Construction under Alternative D would result in a temporary increase in generation of solid waste. Construction waste that cannot be recycled would be collected by a hauling company and disposed of at the Kiefer Landfill, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative D (Cal-Recycle, 2014).

Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

**Operation**

As described in **Section 3.10**, the Historic Rancheria site is located within the service boundaries of the County DWMR, but most service is provided by private hauling companies. The private hauling companies are under franchise agreement with the County DWMR to perform collection and disposal at properties and convey waste to landfills and recycling stations, as appropriate.

Due to the similarities in size and design of Alternative A, waste services described in Alternative A would be the same as Alternatives D. Based on the generation rates of similar gaming facilities, it is estimated that Alternative D would generate approximately 2.88 tons per day and 1,053 tons per year of solid waste (**Table 4.10-4**). As discussed above, waste that cannot be recycled will be disposed of at the Kiefer Landfill or another permitted facility. The Kiefer Landfill has a permitted capacity of 10,815 tons per day. The landfill has nearly 113 million cubic yards of available capacity and is estimated to have sufficient capacity to maintain operations through 2064 (Cal-Recycle, 2014). As with Alternative A, Alternative D would represent approximately 0.001 percent of the daily and yearly landfill capacity.

**TABLE 4.10-4**  
ESTIMATED SOLID WASTE DISPOSAL – ALTERNATIVE D

Waste Generation Source	Waste Generation Rate <sup>1</sup>	Units	Value	Total Waste (lb/day)
Hotel	2	lb/room/day	302	604
Casino (other services)	3.12	lb/100 sf/day	110,260	3,440
Restaurant	0.005	lb/sf/day	44,500	222.5
Convention Center	3.12	lb/100 sf/day	48,150	1502
<b>Total lb/day</b>				<b>5,768.89</b>
<b>Total ton/day</b>				<b>2.88</b>
<b>Total ton/year</b>				<b>1,052.82</b>
<b>Total cy/year</b>				<b>6580</b>
Source: Cal-Recycle, 2014				

Operation of Alternative D would not result in significant effects on solid waste services. Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of solid waste disposed of at the landfill and ensure impacts remain less than significant.

**Law Enforcement**

An analysis of the impact of casino gambling on local crime rates is included in **Section 4.7**.

As discussed in **Section 2.5.2**, law enforcement services, including prosecution, court, and jail services, would be provided by the SCSD. A Tribal security force would provide security patrol and monitoring needs of the casino as needed. Security cameras and security personnel would provide surveillance of the casino, parking areas, and surrounding grounds. Security guards would patrol the facilities to reduce and prevent criminal and civil incidents. Security guards would carry two-way radios to request and respond to back up or emergency calls. Tribal security personnel would work cooperatively with other law enforcement agencies. The need for SCSD assistance would likely be required only in situations where a serious threat to life or property is present, or if arrests are necessary.

SCSD may require additional facilities, equipment, and staffing to meet the increased need for services under Alternative D, though, as with Alternative A, the increase is expected to be minimal. Also, due to the potential for an increase in calls for service during operation of Alternative D and extended hours of operation at the Historic Rancheria site, a potentially significant adverse effect could occur. Additionally, an increase in service demands to the CHP may result from development of the project. However, payments to the State under the Tribal-State compact would offset any impacts to the CHP.

With implementation of the on-site security measures and the mitigation discussed in **Section 5.10.3**, impacts would be addressed, and Alternative D would result in a less than significant effect on public law enforcement services.

## **Fire Protection and Emergency Medical Services**

### ***Construction***

As with Alternatives A through C, construction may introduce potential sources of fire to the Historic Rancheria site. This risk would be similar to that found at other construction sites and is considered potentially significant. Mitigation measures are presented in **Section 5.10.4** to address this potential impact and reduce impacts to less than significant levels.

### ***Operation***

After development of Alternative D, the Wilton Fire Protection District would provide fire suppression services to the Historic Rancheria site under the operation of Alternative D. As discussed in **Section 4.10.1**, development of the casino structure would create additional risks from fires and add to firefighting responsibilities in the area. Due to the potential for an increase in calls for fire protection services during operation of Alternative D and the extended hours of operation at Historic Rancheria site, a potentially significant impact to the Wilton Fire Protection District could occur. With implementation of the mitigation discussed in **Section 5.10.4**, impacts would be addressed, and Alternative D would result in a less than significant effect on public fire protection services.

The Wilton Fire Protection District also provides first responder emergency medical service through paramedic staffing on ambulances and engines. Due to the volume of patrons and employees at the

facility, this would be a significant impact. As with Alternatives A through C, first responder and ambulance service would be provided to the casino resort via a service agreement, as noted in **Section 5.10.4**.

The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 8.6 miles northwest of the Historic Rancheria site. Because hospital services are adequate in this area, this would be a less than significant impact.

## **Electricity, Natural Gas, and Other Utilities**

### ***Construction***

Construction on the Historic Rancheria site could damage underground utilities, leading to outages and/or serious injury. This would result in an adverse effect. Mitigation measures are presented in **Section 5.10.5** to reduce impacts to less than significant.

### ***Operation***

Electricity for the Historic Rancheria site would be obtained from SMUD, which serves the project vicinity out of its Dillard-Wilton Substation, located approximately one mile from the Historic Rancheria site at the northeast corner of the intersection of Dillard Road and Wilton Road. It is expected that the substation will be able to serve Alternative D. The size of wire for overhead distribution lines along Green Road may need to be increased to serve Alternative D. The final determination regarding the need for facility upgrades will be made during the application process. Mitigation in **Section 5.10.5** would reduce this impact to a less than significant level.

Natural gas service is not currently available at the site; however, connections could be developed through coordination with PG&E. Alternatively, the Tribe could use other power sources such as propane or electrical appliances. If a connection to natural gas lines is developed, the impact to natural gas services would not be significant as capacity is available.

Several private companies provide telephone, internet, and cable services to properties within the vicinity of the Historic Rancheria site and have the capacity to provide Alternative D with adequate telecommunications services. Therefore, providing telephone and cable services to the site is not expected to be a significant impact.

Implementation of Alternative D would result in a less than significant impact to electricity, natural gas, and telecommunications services and demand. Nonetheless, mitigation measures have been identified in **Section 5.10.5** to further reduce the energy demand of, and ensure adequate services for, Alternative D.

#### 4.10.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE

##### Water Supply

The estimated average daily water consumption for Alternative E (including landscaping and irrigation) would be approximately 265,000 gpd (**Appendix I**). Through the development of an on-site WWTP, recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand (**Appendix I**).

As with Alternative D, the Tribe would implement the on-site water system recommendations contained in the Water and Wastewater Study (**Appendix I**), which are identical to those discussed under Alternative A. In addition, wellhead treatment should be installed for any water quality constituent that exceeds EPA or the Department of Health Services regulatory standards for drinking water. Components of the on-site water supply system would include two on-site wells, a treatment plant, a 371,000 gallon water storage tank, and an internal distribution system. The on-site system is described in **Section 2.6.1** and detailed in **Appendix I**.

The impacts to water resources, including groundwater supply, associated with Alternative E, are discussed in **Section 4.3**. No municipal water systems would be affected by Alternative E as no connections are proposed and the use of groundwater for on-site purposes would continue on the Historic Rancheria site.

##### Wastewater Service

The projected average daily wastewater flow for Alternative E would be approximately 151,000 gpd, with peak day flows estimated at 201,000 gpd. Alternative D wastewater treatment and disposal would be provided by the development of an on-site WWTP and a treated effluent discharge point to the Cosumnes River. The proposed treatment and disposal facility would provide for the use of reclaimed water for casino toilet flushing and landscape irrigation. The on-site wastewater system is described in **Section 2.6.1** and detailed in **Appendix I**. To accommodate the projected peak flow from the casino development (219,000 gpd), the WWTP capacity would be 250,000 gpd. A recycled water tank with a capacity of approximately 175,000 gallons and a 150,000 gallon effluent disposal tank would additionally be developed to store treated wastewater.

The impacts to water resources associated with Alternative E wastewater service are discussed in **Section 4.3**. No municipal wastewater systems would be affected by Alternative E as no connections are proposed.

## Solid Waste Service

### Construction

As with Alternatives A through D, the development under Alternative E would result in a temporary increase in generation of solid waste. Construction waste that cannot be recycled would be collected by a hauling company and disposed of at the Kiefer Landfill, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative E (Cal-Recycle, 2014). Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

### Operation

As described in **Section 3.10**, the Historic Rancheria site is located within the service boundaries of the County DWMR, but most service is provided by private hauling companies. The private hauling companies are under franchise agreement with the County DWMR to perform collection and disposal at properties and convey waste to landfills and recycling stations, as appropriate.

Due to the similarities in size and design of Alternative B, waste services described in Alternative B would be the same as Alternative E. Based on the generation rates of similar gaming facilities, it is estimated that Alternative E would generate approximately 1.82 tons per day and 666 tons per year of solid waste (**Table 4.10-5**). Landscaping and maintenance staff would pick up any trash that is left on the property. Decorative receptacles for trash and recycling would be placed strategically throughout the casino, hotel, and associated facilities to discourage littering. As discussed above, waste that cannot be recycled will be disposed of at the Kiefer Landfill or another permitted facility. The Kiefer Landfill has a permitted capacity of 10,815 tons per day. The landfill has nearly 113 million cubic yards of available capacity, and is estimated to have sufficient capacity to maintain operations through 2064 (Cal-Recycle, 2014). Alternative E would represent approximately 0.0001 percent of the daily and yearly landfill capacity.

**TABLE 4.10-5**  
ESTIMATED SOLID WASTE DISPOSAL – ALTERNATIVE E

Waste Generation Source	Waste Generation Rate <sup>1</sup>	Units	Value	Total Waste (lb/day)
Casino (other services)	3.12	lb/100 sf/day	110,260	3,440
Restaurant	0.005	lb/sf/day	42,300	211.5
<b>Total lb/day</b>				<b>3,651</b>
<b>Total ton/day</b>				<b>1.82</b>
<b>Total ton/year</b>				<b>666.4</b>
<b>Total cy/year</b>				<b>4,165.2</b>
Source: Cal-Recycle, 2014				

Therefore, as with Alternative B, the operation of Alternative E would not result in significant effects on solid waste services. Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of solid waste disposed of at the landfill and ensure impacts remain less than significant.

## **Law Enforcement**

An analysis of the impact of casino gambling on local crime rates is included in **Section 4.7**.

As discussed in **Section 2.5.2**, law enforcement services, including prosecution and court and jail services, would be provided to the Historic Rancheria site by the SCSD.

Tribal security force would provide security patrol and monitoring needs of the casino as needed. Tribal security personnel would work cooperatively with the SCSD. The need for SCSD assistance would likely be required only in situations in which there were a serious threat to life and property and during which arrests would be made.

SCSD may require additional facilities, equipment, and staffing to meet the increased need for services under Alternative E, though, as with Alternative A, the increase is expected to be minimal. Also, due to the potential for an increase in calls for service during operation of Alternative E and extended hours of operation at the Historic Rancheria site, a potentially significant adverse effect could occur. Additionally, an increase in service demands to the CHP may result from development of the project. However, payments to the State under the Tribal-State compact would offset any impacts to the CHP.

With implementation of the on-site security measures and the mitigation discussed in **Section 5.10.3**, impacts would be addressed, and Alternative E would result in a less than significant effect on public law enforcement services.

## **Fire Protection and Emergency Medical Services**

### ***Construction***

As with Alternative D, construction may introduce potential sources of fire to the Historic Rancheria site. This risk would be similar to that found at other construction sites and is considered potentially significant. Mitigation measures are presented in **Section 5.10.3** to address this potential impact and reduce impacts to less than significant levels.

### ***Operation***

As with Alternative D, the Wilton Fire Protection District would provide fire suppression services to the Historic Rancheria site under the operation of Alternative E. As discussed in **Section 4.10.1**, development of the casino structure would create additional risks from fires and add to firefighting responsibilities in the area. Due to the potential for an increase in calls for fire protection services during

operation of Alternative D and the extended hours of operation at Historic Rancheria site, a potentially significant impact to the Wilton Fire Protection District could occur. With implementation of the mitigation discussed in **Section 5.10.4**, impacts would be addressed and Alternative E would result in a less than significant effect on public fire protection services.

The Wilton Fire Protection District also provides first responder emergency medical service through paramedic staffing on ambulances and engines. Due to the volume of patrons and employees at the facility, this would be a significant impact. As with Alternatives A through D, first responder and ambulance service would be provided to the casino resort via a service agreement, as noted in **Section 5.10.4**.

The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 8.6 miles northwest of the Historic Rancheria site. Because hospital services are adequate in this area, this would be a less than significant impact.

## **Electricity, Natural Gas, and Other Utilities**

### ***Construction***

Similar to Alternative D, construction on the Historic Rancheria site could damage underground utilities, leading to outages and/or serious injury. This would result in an adverse effect. Mitigation measures are presented in **Section 5.10.5** to reduce impacts to less than significant.

### ***Operation***

Electricity for the Historic Rancheria site would be obtained from SMUD. Refer to **Section 4.10.4** for further discussion. It is expected that the existing substation will be able to serve Alternative D. The size of wire for overhead distribution lines along Green Road may need to be increased to serve Alternative D. Mitigation in **Section 5.10.5** would reduce this impact to a less than significant level.

Natural gas service is not currently available at the site; however, connections could be developed through coordination with PG&E. Refer to **Section 4.10.4** for further discussion.

Several private companies provide telephone, internet, and cable services to properties within the vicinity of the Historic Rancheria site and have the capacity to provide Alternative E with adequate telecommunications services. Therefore, providing telephone and cable services to the site is not expected to be a significant impact.

Implementation of Alternative D would result in a less than significant impact to electricity, natural gas, and telecommunications services and demand. Nonetheless, mitigation measures have been identified in **Section 5.10.5** to further reduce the energy demand of, and ensure adequate services for, Alternative D.

#### 4.10.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE

##### Water Supply

The estimated average daily water consumption for Alternative F (including landscaping and irrigation) would be approximately 260,000 gpd (**Appendix I**). Alternative F would be supplied water through connections to Sacramento County Water Agency (SCWA) infrastructure partially developed on the Mall site. SCWA would also provide fire flows at a rate of 4,000 gpm (**Appendix I**). Planned SCWA water system improvements are described in **Section 2.7.2** and detailed in **Appendix I**. The impacts to water resources, including groundwater supply, associated with Alternative F are discussed in **Section 4.3**.

A significant effect would occur to water supply distribution facilities as a result of the need to provide service to Alternative F. As discussed in **Section 2.7.2**, the SCWA has capacity to meet anticipated demand for domestic water use under Alternative F; however, the Tribe would resubmit water improvement plans to SCWA and pay the remaining water development fees (refer to **Appendix I**). Mitigation is provided in **Section 5.10.1** to ensure that an adequate water supply is available for the operation of Alternative F, and for the necessary fire flows. With mitigation measures, the impact would be less than significant.

##### Wastewater Service

The projected average daily wastewater flow for Alternative F would be approximately 232,000 gpd, with peak day flows estimated at 309,000 gpd (**Appendix I**). Under Alternative F, the Tribe would obtain a services agreement with the Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (SASD) to provide sewer service to the Mall site. Partially completed connections to SASD infrastructure are located on and in the immediate vicinity of the Mall site. The completion of these connections to the existing wastewater conveyance system would occur under Alternative F and wastewater would be conveyed to the SRCSD WWTP where treatment would occur. Treated effluent would meet water quality guidelines as discussed further in **Section 4.3**. The wastewater system connection infrastructure is further described in **Section 2.7.2** and detailed in **Appendix I**.

As discussed in **Section 3.10**, the Sacramento Regional WWTP has a permitted capacity of 181 MGD average dry weather flow (ADWF). The facility's current ADWF is approximately 140 MGD. The WWTP currently permitted to discharge 181 MGD of ADWF and currently operates around 141 MGD for. The plant currently has an available capacity of about 40 MGD (**Appendix I**). The 40 MGD of current available capacity at the Sacramento Regional WWTP would accommodate the wastewater demands of Alternative F.

However, due to the lack of an existing service agreement, a potentially significant impact to the SRCS and SASD sewer system and WWTP would occur, and therefore mitigation is included in **Section 5.10.1**. With implementation of mitigation, the impacts to the SRCS and SASD wastewater services would be reduced to a minimal level.

## Solid Waste Service

### Construction

Construction of the casino under Alternative F would result in a temporary increase in generation of solid waste. Construction waste that cannot be recycled would be collected by a hauling company and may be disposed of at the Kiefer Landfill or other landfills contracted by commercial waste haulers, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative F (Cal-Recycle, 2014). Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

### Operation

As described in **Section 3.10**, the Mall site is located within the service boundaries of the City of Elk Grove, and most commercial service is provided by private hauling companies.

Based on the generation rates of similar gaming facilities, it is estimated that Alternative F would generate approximately 2.97 tons per day of trash (**Table 4.10-6**). Landscaping and maintenance staff would pick up any trash that is left on the property. Decorative receptacles for trash and recycling would be placed strategically throughout the casino, hotel, and associated facilities to discourage littering. As discussed above, waste that cannot be recycled will be disposed of at the Kiefer Landfill or one of several other permitted facilities. However, to be conservative, the available capacity of Kiefer Landfill has been evaluated. The Kiefer Landfill has a permitted capacity of 10,815 tons per day, and has nearly 113 million cubic yards of available capacity. It has sufficient capacity to maintain operations through 2064 (Cal-Recycle, 2014). As with Alternative A, Alternative F would represent approximately 0.0002 percent of the daily and yearly landfill capacity.

**TABLE 4.10-6**  
ESTIMATED SOLID WASTE DISPOSAL – ALTERNATIVE F

Waste Generation Source	Waste Generation Rate <sup>1</sup>	Units	Value	Total Waste (lb/day)
Hotel	2	lb/room/day	307	614
Casino	3.12	lb/100 sf/day	110,260	3,440.12
Restaurant	0.005	lb/sf/day	44,500	222.5
Convention Center	3.12	lb/100 sf/day	48,150	1502.28
Commercial Retail	2.5	Lb/ksf/day	29,950	74.875
<b>Total lb/day</b>				<b>5,853.7</b>
<b>Total ton/day</b>				<b>2.968</b>
<b>Total ton/year</b>				<b>1,068.312</b>
<b>Total cy/year</b>				<b>6,676.95</b>
Source: Cal-Recycle, 2014				

Operation of Alternative F would not result in significant effects on solid waste services. Mitigation measures are presented in **Section 5.10.2** to further reduce the amount of solid waste disposed of at the landfill and ensure impacts remain less than significant.

## **Law Enforcement**

An analysis of the impact of casino gambling on local crime rates is included in **Section 4.7**.

As discussed in **Section 2.7.2**, law enforcement services would be provided by the SCSD and/or the City of Elk Grove Police Department (EGPD), while prosecution and court and jail services would be provided by the SCSD. A Tribal security force would provide security patrol and monitoring needs of the casino as needed. Security cameras and security personnel would provide surveillance of the casino, parking areas, and surrounding grounds. Security guards would patrol the facilities to reduce and prevent criminal and civil incidents. Security guards would carry two-way radios to request and respond to back up or emergency calls. Tribal security personnel would work cooperatively with other law enforcement agencies. The need for EGPD or SCSD assistance would likely be required only in situations where a serious threat to life or property is present, or if arrests are necessary.

EGPD and/or SCSD may require additional facilities, equipment, and staffing to meet the increased need for services under Alternative F. Also, due to the potential for an increase in calls for service during operation of Alternative F and extended hours of operation at the Twin Cities site, a potentially significant adverse effect could occur. Additionally, an increase in service demands to the CHP may result from development of the project. However, payments to the State under the Tribal-State compact would offset any impacts to the CHP, and the 2016 MOU between the City of Elk Grove and the Tribe requires a one-time payment for police equipment and an annual payments for police and code enforcement services (**Appendix B**).

With implementation of the on-site security measures and mitigation discussed in **Section 5.10.3**, impacts would be addressed, and Alternative F would result in a less than significant effect on public law enforcement services.

## **Fire Protection and Emergency Medical Services**

### ***Construction***

Construction may introduce potential sources of fire to the Mall site. This risk would be similar to that found at other construction sites and is considered potentially significant. Mitigation measures are presented in **Section 5.10.4** to address this potential impact and reduce impacts to less than significant levels.

### ***Operation***

As with Alternatives A through E, the CCSD Fire Department would continue to provide fire suppression services to the Mall site under the operation of Alternative F. The development of the casino structure would create additional risks from fires and add to firefighting responsibilities in the area. Due to the potential for an increase in calls for fire protection services during operation of Alternative F and the extended hours of operation at Mall site, a potentially significant impact to the CCSD Fire Department could occur. With implementation of the mitigation discussed in **Section 5.10.4**, impacts would be addressed, and Alternative F would result in a less than significant effect on public fire protection services.

The CCSD Fire Department also provides first responder emergency medical service through paramedic staffing on ambulances and engines. Due to the volume of patrons and employees at the facility, this would be a significant impact. As with Alternatives A through D, first responder and ambulance service would be provided to the casino resort via a service agreement, as noted in **Section 5.10.4**. Furthermore, the 2016 MOU between the City of Elk Grove and the Tribe requires that the Tribe “provide emergency medical training to members of its security staff... and emergency medical equipment, including defibrillators” (**Appendix B**).

The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 5.7 miles north of the Mall site. Because hospital services are adequate in this area, this would be a less than significant impact.

## **Electricity, Natural Gas, and Other Utilities**

### ***Construction***

Construction on the Mall site could damage underground utilities, leading to outages and/or serious injury. This would result in an adverse effect. Mitigation measures are presented in **Section 5.10.5** to reduce impacts to less than significant.

### ***Operation***

Electricity would be obtained from SMUD, which currently provides electricity to the Mall site. SMUD serves the project vicinity out of its Promenade Substation, located less than one mile from the Mall site. The final determination regarding the need for facility upgrades will be made during the application process. Mitigation in **Section 5.10.5** would reduce this impact to a less than significant level.

Natural gas service infrastructure is available on and around the Mall site; however, connections could be developed through cooperation with PG&E. Alternatively, the Tribe could use other power sources such as propane or electrical appliances. If a connection to natural gas lines is developed, the impact to natural gas services would be insignificant as capacity is available.

Several private companies provide telephone, internet, and cable services to properties within the vicinity of the Mall site and have the capacity to provide Alternative F with adequate telecommunications services. Therefore, providing telephone and cable services to the site is not expected to be a significant impact.

Implementation of Alternative F would result in a less than significant impact to electricity, natural gas, and telecommunications services and demand. Nonetheless, mitigation measures have been identified in **Section 5.10.5** to further reduce the energy demand of, and ensure adequate services for, Alternative F.

#### **4.10.7 ALTERNATIVE G – NO ACTION**

Under the No Action alternative, a change in the current land use of the Twin Cities and Historic Rancheria sites is not reasonably foreseeable. None of the potentially adverse effects identified for Alternatives A through E are anticipated to occur. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts to public services would occur as with Alternative F as a result of the No Action alternative.

## 4.11 NOISE

This section identifies the direct effects to noise that would result from the development of each alternative described in **Section 2.0**. Effects are measured against the environmental baseline presented in **Section 3.11**. Cumulative and indirect effects are identified in **Section 4.15** and **Section 4.14**, respectively. Measures to mitigate for adverse effects identified in this section are presented in **Section 5.11**.

### Methodology

The assessment of project effects is based on Federal Noise Abatement Criteria (NAC) standards used by the Federal Highway Administration (FHWA) (**Table 3.11-3** and **Table 3.11-4**). Adverse noise-related effects would occur during construction and operation, if project implementation would result in an increase in the ambient noise environment of greater than 67 decibels, A-weighted (dBA), equivalent noise level (Leq), or would result in an audible increase in ambient noise level at sensitive receptor locations including residential housing in the vicinity of the project site. See **Section 3.11** for descriptions of sensitive receptors. The assessment of vibration noise is based on the Federal Transportation Administration (FTA) standards of 0.5 Peak Particle Velocity (PPV) for structures and 0.1 PPV for annoyance of people (FTA, 2006).

The formula used to relate increases in traffic to increases in ambient noise levels is:

$$NL_F = NL_E + 10\log_{10}(V_F/V_E)$$

where  $NL_F$  = future noise level,  $NL_E$  = existing noise level,  $V_F$  = future vehicle traffic, and  $V_E$  = existing vehicle traffic (Caltrans, 2009). Inclusion of local jurisdiction criteria is for reference only.

### 4.11.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Construction Noise

Grading and construction activities associated with Alternative A would be intermittent and temporary in nature. The closest sensitive receptors that would be exposed to potential noise impacts during project construction are private residences located along Twin Cities Road approximately 200 feet south of the southern border of the Twin Cities site and 4,000 feet south of where most construction activities would occur. Construction noise levels at and near the Twin Cities site would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment.

Construction of Alternative A would consist of ground clearing, excavation, erection of foundations and buildings, and finishing work. No pile-driving is proposed. **Table 4.11-1** shows typical stationary point source noise levels at 25 feet during different construction stages.

**TABLE 4.11-1**  
TYPICAL CONSTRUCTION NOISE LEVELS

Construction Phase	Noise Level at 25 feet (dBA Leq)
Ground Clearing	84
Excavation	89
Foundations	78
Erection	85
Finishing	89
Source: FTA, 2006.	

Stationary point sources of construction noise attenuate (lessen) at a rate of 6-9 dBA per doubling of distance from the source, depending on environmental conditions (i.e., atmospheric conditions, topography and type of ground surfaces, natural and manmade noise barriers, etc.). An attenuation factor of 6.0 dBA per doubling of distance is appropriate for this analysis given the flat topography and lack of vegetation.

The maximum construction noise at the Twin Cities site is estimated to be 89 dBA at 25 feet. Using an attenuation factor of 6.0 dBA Leq per doubling of distance, the maximum noise level at the nearest sensitive noise receptor, a private residence located approximately 4,000 feet south of the Alternative A construction site, would be less than 41 dBA Leq, which is less than the FHWA threshold of 78 dBA Leq (**Table 3.11-3**), less than the County of Sacramento's General Plan threshold of 65 dB (**Table 3.11-5**), and less than the existing noise level (**Table 3.11-8**). Therefore, construction noise associated with Alternative A would not result in significant adverse effects associated with the ambient noise environment.

### **Construction Traffic**

Construction-related material haul trips and worker trips have the potential to raise ambient noise levels along local routes, depending on the number of worker/haul trips made and types of vehicles used. All construction traffic and haul trips would access the Twin Cities site via Twin Cities Road or West Stockton Boulevard. FHWA construction significance criteria for construction activities occurring near a residence is 78 dBA Leq, 83 dBA Leq near a commercial land use, or an increase of five dBA Leq over the existing baseline, whichever is louder (**Section 3.11, Table 3.11-3**).

During construction, a maximum of 506 one-way worker trips would occur per day. Although construction trips would generally occur outside of the peak hour, it is assumed for this noise analysis, as a worst case scenario, that all construction trips occur during the A.M. peak traffic hour. It is conservatively estimated that an average of 16 material hauling trips originating off-site per day would occur during construction. Because these haul trucks are louder than passenger cars, a passenger car equivalence (PCE) multiplier of 8 cars per truck is used (TRB, 2000). Therefore, combining the worker trips and the material trips, the total equivalent passenger car trips per A.M. peak hour would be 634.

The existing ambient noise level in the vicinity of Twin Cities Road near sensitive noise receptors is approximately 57.3 dBA (refer to **Section 3.11, Table 3.11-8**). Construction trips would increase traffic volumes on Twin Cities Road by approximately 634 vehicles during the A.M. and P.M. peak hour, resulting in an increase in the ambient noise level at residential receptors of approximately 0.5 dBA Leq along Twin Cities Road. The increase in ambient noise levels due to the increase in vehicles on area roadways during construction would be less than the FHWA noise thresholds for residential of 78 dBA Leq. Therefore, noise resulting from increased construction traffic for Alternative A would not result in a significant adverse effect to the ambient noise level during any phase of construction. Mitigation measures in **Section 5.11** will further reduce the potential for noise impacts.

### ***Construction Vibration***

Vibration impacts from construction generally occur within 500 feet of a project site (FTA, 2006). Also, the most vibration-prone construction methods (such as pile driving) are not anticipated to be necessary for Alternative A. As the nearest sensitive receptor is located several thousand feet from the construction site, there would be a less than significant impact due to construction vibration.

### **Operational Noise**

The following identifies potential impacts from project-related noise sources, such as traffic, heating ventilation, and air conditioning (HVAC) systems, parking lots, and delivery trucks.

#### ***Traffic***

The levels of operational traffic noise depends on: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of trucks in the flow of the traffic. It is not anticipated that average vehicle speeds would change in the vicinity of the Twin Cities site or that the mix of trucks in the traffic would change during the operational phase; however, with the implementation of Alternative A, traffic volumes from project patrons and employees would increase.

#### ***State Route 99 (Hwy 99)***

The primary source of noise near the Twin Cities site is traffic on Hwy 99. As discussed in the Traffic Impact Analysis (TIA) included as **Appendix O**, operation of Alternative A would cause an increase of 1,057 vehicles per P.M. peak hour to Hwy 99 (Northbound (NB) and Southbound (SB)) between Mingo Road and Twin Cities Road, based on trip generation percent of trips that would travel on Hwy 99. The increase in traffic from operation of Alternative A would not double the traffic volume on Hwy 99; however this increase would result in a 1.4 dBA Leq increase in the ambient noise level from Hwy 99. The existing ambient noise level at in the vicinity of Hwy 99 was measured at 58 dBA Leq (refer to **Section 3.11, Table 3.11-8**). With implementation of Alternative A and subsequent increase in traffic volumes, the ambient noise level at the sensitive receptors near Hwy 99 would be approximately 59.4 dBA Leq, which is less than the NAC of 67 dBA Leq for residential sensitive receptors, and a change of less than 3 dBA, which is the threshold for a perceptible change in noise levels (**Section 3.11, Table**

**3.11-3**) and below the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**). Therefore, Alternative A would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Hwy 99.

#### *Twin Cities Road*

Twin Cities Road is located adjacent to the southern boundary of the site, approximately 450 feet from existing sensitive noise receptors to the northwest. No direct access driveways are proposed on Twin Cities Road. The existing traffic volume on Twin Cities Road is approximately 5,060 daily vehicles west of Hwy 99 in the vicinity of the Twin Cities site (**Appendix O**). Alternative A would add 3,662 daily vehicle trips. The existing ambient noise level at in the vicinity of Twin Cities Road was measured at 57.3 dBA Leq (refer to **Section 3.11, Table 3.11-8**). Alternative A would not double the existing traffic volume on Twin Cities Road west of Hwy 99, but would result in a 2.4 dBA Leq increase in the ambient noise level. With implementation of Alternative A, the ambient noise level on Twin Cities Road increase to approximately 59.7 dBA Leq. The ambient noise level at sensitive receptors along Twin Cities Road, therefore, would be less than the NAC of 67 dBA Leq for residential sensitive receptors, and below the 3 dBA threshold of a perceptible change in noise levels (**Section 3.11, Table 3.11-3**) and below the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**). Therefore, Alternative A would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Twin Cities Road.

#### **Other Noise Sources**

Commercial uses on the Twin Cities site would bring the possibility of noise due to operations of roof-mounted air handling units associated with building HVAC equipment in addition to noise from loading docks and surface parking lots. The noise levels produced by HVAC systems vary with the capacities of the units, as well as with individual unit design. In this case, HVAC systems on commercial buildings would be located at higher elevations than the surrounding residences, so that roof-mounted HVAC equipment has the potential to be heard at nearby sensitive noise receptors. Idling trucks at loading docks, proposed under Alternative A, have the potential to emit 80 dBA at 50 feet from the source. The proposed loading docks would be located along the western side of the casino/hotel structure away from the nearest sensitive receptor.

Given the distance to the nearest sensitive noise receptor (approximately 5,200 feet) and the ambient noise associated with Hwy 99, noise from roof mounted HVAC equipment and the proposed loading docks would not be audible. Therefore, Alternative A operational equipment noise would not result in significant adverse effects associated with the ambient noise environment.

Alternative A paved surface parking lot noise increases would be mainly due to slow moving and idling vehicles, opening and closing doors, and patron conversation. The noise level in parking lots and parking structures is generally dominated by slow moving vehicles; therefore, the ambient noise level in a parking

structures and parking lots is approximately 60 dBA, which is less than the NAC of 67 dBA. Therefore, Alternative A internal vehicle noise levels would not result in significant adverse effects associated with the off-site ambient noise environment.

### **Operational Vibration**

Commercial and hotel uses do not include sources of perceptible vibration. Therefore, operation of Alternative A would not result in significant adverse effects associated with vibration.

## **4.11.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

### **Construction Noise**

Noise impacts resulting from construction related noise associated with Alternative B would be similar to, yet less than, Alternative A due to the removal of the hotel and internal components on the Twin Cities site. Refer to **Section 4.11.1**. Therefore, Alternative B construction traffic noise would not result in significant adverse effects. Similar to Alternative A, mitigation measures have been included in **Section 5.11** under Alternative B to further reduce potential construction related noise impacts.

Noise resulting from construction related traffic from Alternative B would be similar to Alternative A. Refer to **Section 4.11.1**. Therefore, Alternative B construction traffic related noise would not result in significant adverse effects associated with the ambient noise environment.

### **Construction Vibration**

Construction of Alternative B would result in similar vibration effects as Alternative A. Refer to **Section 4.11.1**. Therefore, Alternative B construction vibration would not result in significant adverse effects associated with the ambient noise environment.

### **Operational Noise**

#### **Traffic**

#### *State Route 99 (Hwy 99)*

The primary source of noise near the Twin Cities site is traffic on Hwy 99. As discussed in the TIA included as **Appendix O**, operation of Alternative B would cause increase of 895 P.M. peak hour trips to Hwy 99. The increase in traffic from operation of Alternative B would not double the traffic volume on Hwy 99; however this increase would result in a 1.3 dBA Leq increase in the ambient noise level from Hwy 99, which is an imperceptible change, as it is below 3 dBA. The existing ambient noise level at in the vicinity of Hwy 99 was measured at 58 dBA Leq (refer to **Section 3.11, Table 3.11-8**). With implementation of Alternative B and subsequent increase in traffic volumes, the ambient noise level at the sensitive receptors near Hwy 99 would be approximately 59.3 dBA Leq, which is less than the NAC of 67 dBA Leq for residential sensitive receptors (**Section 3.11, Table 3.11-3**) and the County of Sacramento's

65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**). Therefore, Alternative B would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Hwy 99.

#### *Twin Cities Road*

Twin Cities Road is located adjacent to the southern boundary of the site, approximately 450 feet from existing sensitive noise receptors to the northwest. No direct access driveways are proposed on Twin Cities Road. The existing traffic volume on Twin Cities Road is approximately 5,060 daily vehicles west of Hwy 99 in the vicinity of the Twin Cities site (**Appendix O**). Alternative B would add 3,221 daily vehicle trips. The existing ambient noise level at in the vicinity of Twin Cities Road was measured at 57.3 dBA Leq (refer to **Section 3.11, Table 3.11-8**). Alternative B would not double the existing traffic volume on Twin Cities Road west of Hwy 99, but would result in a 2.1 dBA Leq increase in the ambient noise level, which is an imperceptible change, below the threshold of 3 dBA. With implementation of Alternative A, the ambient noise level on Twin Cities Road increase to approximately 59.4 dBA Leq. The ambient noise level at sensitive receptors along Twin Cities Road, therefore, would be less than the NAC of 67 dBA Leq for residential sensitive receptors (**Section 3.11, Table 3.11-3**) and the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**). Therefore, Alternative B would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Twin Cities Road.

#### **Other Noise Sources**

Noise from stationary sources and parking lots resulting from Alternative B would be similar to Alternative A. Refer to **Section 4.11.1**. Therefore, Alternative B parking structure and lot noise would not result in significant adverse effects associated with the ambient noise environment.

#### **Operational Vibration**

Commercial uses do not include sources of perceptible vibration. Therefore, operation of Alternative B would not result in significant adverse effects associated with vibration.

### **4.11.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

#### **Construction Noise**

Noise impacts resulting from grading and construction associated with Alternative C would be similar to Alternative A due to the size and location of the developments in the northern portion of the Twin Cities site. Therefore, Alternative C construction traffic noise would not result in significant adverse effects.

Noise resulting from construction activities within the Twin Cities site from Alternative C would be similar to Alternative A due to size and location. Therefore, Alternative C construction noise would not result in significant adverse effects associated with the ambient noise environment.

### ***Construction Vibration***

Construction of Alternative C would result in lesser vibration effects than Alternative A. Refer to **Section 4.11.1**. Therefore, Alternative C construction vibration would not result in significant adverse effects associated with the ambient noise environment.

### **Operational Noise**

#### ***Traffic***

##### ***State Route 99 (Hwy 99)***

The primary source of noise near the Twin Cities site is traffic on Hwy 99. As discussed in the TIA included as **Appendix O**, operation of Alternative C would cause an increase of 3,972 P.M. peak hour trips to Hwy 99 SB between Mingo Road and Twin Cities Road. The increase in traffic from operation of Alternative C would not double the traffic volume on Hwy 99; however this increase would result in a 2.8 dBA Leq increase in the ambient noise level from Hwy 99. The existing ambient noise level at in the vicinity of Hwy 99 was measured at 58 dBA Leq (refer to **Section 3.11, Table 3.11-8**), making the difference in noise levels below the threshold of human perception. With implementation of Alternative C and subsequent increase in traffic volumes, the ambient noise level at the sensitive receptors near Hwy 99 would be approximately 60.8 dBA Leq, which is less than the NAC of 67 dBA Leq for residential sensitive receptors (**Section 3.11, Table 3.11-3**) and the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**). Therefore, Alternative C would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located on Hwy 99.

##### ***Twin Cities Road***

Twin Cities Road is located adjacent to the southern boundary of the site, approximately 450 feet from existing sensitive noise receptors to the northwest. No direct access driveways are proposed on Twin Cities Road. The existing traffic volume on Twin Cities Road is approximately 5,060 daily vehicles west of Hwy 99 in the vicinity of the Twin Cities site (**Appendix O**). Alternative C would add 3,615 daily vehicle trips. The existing ambient noise level at in the vicinity of Twin Cities Road was measured at 57.3 dBA Leq (refer to **Section 3.11, Table 3.11-8**). Alternative C would not double the existing traffic volume on Twin Cities Road west of Hwy 99, but would result in an imperceptible 2.3 dBA Leq increase in the ambient noise level. With implementation of Alternative C, the ambient noise level on Twin Cities Road increase to approximately 59.6 dBA Leq. The ambient noise level at sensitive receptors along Twin Cities Road, therefore, would be less than the NAC of 67 dBA Leq for residential sensitive receptors (**Section 3.11, Table 3.11-3**) and the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**). Therefore, Alternative C would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Twin Cities Road.

### ***Other Noise Sources***

Noise from stationary sources and parking lots resulting from Alternative C would be similar to Alternative A. Refer to **Section 4.11.1**. Therefore, Alternative C parking lot, HVAC, and loading dock noise would not result in significant adverse effects associated with the ambient noise environment.

### **Operational Vibration**

Commercial uses do not include sources of perceptible vibration. Therefore, operation of Alternative C would not result in significant adverse effects associated with vibration.

## **4.11.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE**

### **Construction Noise**

#### ***Construction Traffic***

Grading and construction activities associated with Alternative D would be intermittent and temporary in nature. The closest sensitive receptors that would be exposed to potential noise impacts during project construction are private residences located along Green Road approximately 500 feet east and west of the proposed development area on the Historic Rancheria site. Construction noise levels at and near the Historic Rancheria site would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment. Construction-related material haul trips and worker trips have the potential to raise ambient noise levels along local routes, depending on the number of worker/haul trips made and types of vehicles used. All construction traffic and haul trips would access the Historic Rancheria site via Green Road.

The existing ambient noise level in the vicinity of Green Road was measured at 56.1 dBA Leq, (refer to **Section 3.11, Table 3.11-9**). FHWA construction significance criteria for construction activities occurring near a residence is 78 dBA Leq, 83 dBA Leq near a commercial land use, or an increase of five dBA Leq over the existing baseline, whichever is louder (**Section 3.11.2, Table 3.11-3**).

Construction of Alternative D would consist of ground clearing, excavation, erection of foundations and buildings, and finishing work. No pile-driving is proposed. **Table 4.11-1**, above, shows typical stationary point source noise levels at 25 feet during different construction stages. An attenuation factor of 6.0 dBA per doubling of distance is appropriate for this analysis given the flat topography and minimal vegetation along Green Road and Historic Rancheria property boundaries

As shown in **Table 4.11-1**, the maximum construction noise at the Twin Cities site is estimated to be 89 dBA at 25 feet. Using an attenuation factor of 6.0 dBA Leq per doubling of distance, the maximum noise level at the nearest sensitive noise receptors, private residences located approximately 500 feet to the east and west of the Alternative D construction site would be approximately 65 dBA Leq, which is less than the FHWA threshold of 78 dBA Leq (**Table 3.11-3**) and the County of Sacramento's 65 dBA Leq

residential threshold (**Section 3.11, Table 3.11-5**). Therefore, construction noise associated with Alternative D would not result in significant adverse effects associated with the ambient noise environment.

### ***Construction Vibration***

Construction activities for Alternative D would consist of using earthmoving equipment shown in **Table 4.11-1**, which can produce detectable or damaging levels of vibration at nearby sensitive land uses, primarily depending on the distance between the source and the nearby sensitive land use. Generally, physical damage is only an issue when construction requires the use of equipment with high vibration levels (i.e., compactors, large dozers, etc.) and occurs within 25 feet of an existing structure. **Table 4.11-1** provides estimated vibration levels at 25 feet and 80 feet from construction activities. The predicted PPV levels are below the significance threshold of 0.5 PPV for structures at 25 feet and 0.1 PPV for annoyance of people at 80 feet (FTA, 2006). Therefore, vibration from construction of Alternative D would not result in significant adverse effects to nearby structures and sensitive receptors.

### **Operational Noise**

The following identifies potential impacts from project-related noise sources, such as traffic, HVAC systems, parking structure and parking lots, and deliveries.

#### ***Traffic***

The levels of operational traffic noise depends on: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of trucks in the flow of the traffic. It is not anticipated that average vehicle speeds would change in the vicinity of the Historic Rancheria site or that the mix of trucks in the traffic would change during the operational phase; however, with the implementation of Alternative D traffic volumes from project patrons and employees would increase.

#### ***Green Road***

The primary source of noise in the project area, nearest to residential land uses, is generated by traffic on Green Road. As discussed in the TIA (**Appendix O**), there are approximately 4,090 vehicles per day on Green Road from Wilton Road to the Historic Rancheria site. Operation of Alternative D would add an estimated 10,900 vehicles per day to this roadway (**Appendix O**). There are approximately 2,069 vehicles per day on Green Road from the Historic Rancheria site to Dillard Road, to which Alternative D would add 242 vehicles per day. The increase in traffic from operation of Alternative D would not double the traffic volume on either segment of Green Road; however this increase would result in a 5.6 dBA Leq increase in the ambient noise level from Wilton Road to the site and 0.5 dBA Leq from the site to Dillard Road. The existing ambient noise level at in the vicinity of Green Road was measured at 56.1 dBA Leq (refer to **Section 3.11, Table 3.11-9**). With implementation of Alternative D and subsequent increase in traffic volumes, the ambient noise level on the east portion of Green Road would be 61.7 dBA Leq and on the west side would be 56.6 dBA Leq, both of which fall under the NAC of 67 dBA Leq for residential

sensitive receptors (**Section 3.11, Table 3.11-3**). Therefore, Alternative D would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Green Road.

### **Other Noise Sources**

Commercial uses on the Historic Rancheria site would bring the possibility of noise due to operations of roof-mounted air handling units associated with building HVAC equipment in addition to noise from loading docks and surface parking lots. The noise levels produced by HVAC systems vary with the capacities of the units, as well as with individual unit design. In this case, HVAC systems on commercial buildings would be located at higher elevations than the surrounding residences, so that roof-mounted HVAC equipment has the potential to be heard at nearby sensitive noise receptors. Idling trucks at loading docks, proposed under Alternative D, have the potential to emit 80 dBA at 50 feet from the source. The proposed loading docks would be located along the northeastern side of the casino/hotel structure approximately 500 feet from the nearest sensitive receptor.

Given the distance to the nearest sensitive noise receptor (approximately 500 feet), noise from roof mounted HVAC equipment and the proposed loading docks would potentially be audible to off-site sensitive receptors. Therefore, Alternative D operational equipment noise would result in potentially significant adverse effects associated with the ambient noise environment. Mitigation measures proposed in **Section 5.11** would reduce impacts to sensitive receptors from HVAC and loading dock operation to a less-than-significant level.

Alternative A parking structures and paved surface parking lot noise increases would be mainly due to slow moving and idling vehicles, opening and closing doors, and patron conversation. The noise level in parking lots and parking structures is generally dominated by slow moving vehicles; therefore, the ambient noise level in a parking lot is approximately 60 dBA, which is less than the NAC of 67 dBA. Therefore, Alternative D internal vehicle noise levels would not result in significant adverse effects associated with the off-site ambient noise environment.

### **Operational Vibration**

Commercial and hotel uses do not include sources of perceptible vibration. Therefore, operation of Alternative D would not result in significant adverse effects associated with vibration.

## **4.11.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

### **Construction Noise**

Noise impacts resulting from construction related noise associated with Alternative E would be similar to, yet less than, Alternative D due to the removal of the hotel component on the Historic Rancheria site. Refer to **Section 4.11.4**. Therefore, Alternative E construction traffic noise would potentially result in

significant adverse effects. Similar to Alternative D, mitigation measures have been included in **Section 5.11** under Alternative E to reduce potential construction related noise impacts.

Noise resulting from construction related traffic from Alternative E would be similar to Alternative D. Refer to **Section 4.11.4**. Therefore, Alternative E construction traffic related noise would potentially result in significant adverse effects associated with the ambient noise environment. Mitigation measures are provided in **Section 5.11**, to reduce stationary construction noise effects associated with Alternative E.

Therefore, with implementation of mitigation measures, construction noise associated with Alternative E would not result in significant adverse effects associated with the ambient noise environment.

### ***Construction Vibration***

Construction of Alternative E would result in similar vibration effects as Alternative D. Refer to **Section 4.11.4**. Alternative E construction vibration would not result in significant adverse effects associated with the ambient noise environment.

## **Operational Noise**

### ***Traffic***

#### ***Green Road***

The primary source of noise in the project area, nearest to residential land uses, is generated by traffic on Green Road. As discussed in the TIA (**Appendix O**), there are approximately 4,090 vehicles per day on Green Road from Wilton Road to the Historic Rancheria site. Operation of Alternative E would add an estimated 8,013 vehicles per day to this roadway (**Appendix O**). There are approximately 2,069 vehicles per day on Green Road from the Historic Rancheria site to Dillard Road, to which Alternative D would add 183 vehicles per day. The increase in traffic from operation of Alternative E would not double the traffic volume on either segment of Green Road; however this increase would result in a 4.7 dBA Leq increase in the ambient noise level from Wilton Road to the site and 0.4 dBA Leq from the site to Dillard Road. The existing ambient noise level at in the vicinity of Green Road was measured at 56.1 dBA Leq (refer to **Section 3.11, Table 3.11-9**). With implementation of Alternative E and subsequent increase in traffic volumes, the ambient noise level on the east portion of Green Road would be 60.1 dBA Leq and on the west side would be 56.5 dBA Leq, both of which fall under the NAC of 67 dBA Leq for residential sensitive receptors (**Section 3.11, Table 3.11-3**) and the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**). Therefore, Alternative E would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Green Road.

### ***Other Noise Sources***

Noise from stationary sources and parking lots resulting from Alternative E would be similar to Alternative D. Refer to **Section 4.11.1**. Therefore, Alternative E parking lot noise would not result in significant adverse effects associated with the ambient noise environment.

### **Operational Vibration**

Commercial uses do not include sources of perceptible vibration. Therefore, operation of Alternative E would not result in significant adverse effects associated with vibration.

## **4.11.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

### **Construction Noise**

#### ***Construction Traffic***

Grading and construction activities associated with Alternative F would be intermittent and temporary in nature. The closest sensitive receptor that would be exposed to potential noise impacts during construction of Alternative F is the Kaiser Permanente building just less than 1,000 feet north of the proposed development area on the Elk Grove Mall site (Mall site). Construction noise levels at and near the Mall site would fluctuate depending on the particular type, number, and duration of uses of various pieces of construction equipment. Construction-related material haul trips and worker trips have the potential to raise ambient noise levels along local routes, depending on the number of worker/haul trips made and types of vehicles used. All construction traffic and haul trips would access the Mall site via Kammerer Road and Promenade Parkway.

The existing ambient noise level in the vicinity of the Mall site was measured at 52.4 dBA Leq (refer to **Section 3.11, Table 3.11-10**). FHWA construction significance criteria for construction activities occurring near a residence is 78 dBA Leq, 83 dBA Leq near a commercial land use, or an increase of five dBA Leq over the existing baseline, whichever is louder (**Section 3.11, Table 3.11-3**).

Construction of Alternative F would consist of ground clearing, excavation, erection of foundations and buildings, and finishing work. No pile-driving is proposed. **Table 4.11-1** shows typical stationary point source noise levels at 25 feet during different construction stages. An attenuation factor of 6.0 dBA per doubling of distance is appropriate for this analysis given the flat topography and minimal vegetation near the Mall site boundaries.

As shown in **Table 4.11-1**, the maximum construction noise at the Mall site is estimated to be 89 dBA at 25 feet. Using an attenuation factor of 6.0 dBA Leq per doubling of distance, the maximum noise level at the nearest sensitive noise receptor, the healthcare business located approximately 1,000 feet north of the Alternative F construction site, would be less than 59 dBA Leq, which is less than both the FHWA threshold of 78 dBA Leq (**Table 3.11-3**) and the County of Sacramento's 65 dBA Leq healthcare

facilities threshold (**Section 3.11, Table 3.11-5**). Therefore, construction noise associated with Alternative F would not result in significant adverse effects associated with the ambient noise environment.

### ***Construction Vibration***

Construction activities for Alternative F would consist of using earthmoving equipment shown in **Table 4.11-1**, above, which can produce detectable or damaging levels of vibration at nearby sensitive land uses, primarily depending on the distance between the source and the nearby sensitive land use. Generally, physical damage is only an issue when construction requires the use of equipment with high vibration levels (i.e., compactors, large dozers, etc.) and occurs within 25 feet of an existing structure. **Table 4.11-1** provides estimated vibration levels at 25 feet and 80 feet from construction activities. The predicted PPV levels are below the significance threshold of 0.5 PPV for structures at 25 feet and 0.1 PPV for annoyance of people at 80 feet (FTA, 2006). Therefore, vibration from construction of Alternative F would not result in significant adverse effects to nearby structures and sensitive receptors.

### **Operational Noise**

The following identifies potential impacts from project-related noise sources, such as traffic, HVAC systems, parking structure and parking lots, and deliveries.

#### ***Traffic***

The levels of operational traffic noise depends on: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of trucks in the flow of the traffic. It is not anticipated that average vehicle speeds would change in the vicinity of the Mall site or that the mix of trucks in the traffic would change during the operational phase; however, with the implementation of Alternative F traffic volumes from project patrons and employees would increase.

#### ***State Route 99 (Hwy 99)***

The primary source of noise near the Mall site is traffic on Hwy 99. As discussed in the TIA included as **Appendix O**, operation of Alternative F would cause an increase of 797 vehicles per P.M. peak hour to Hwy 99 between Elk Grove Boulevard and Grant Line Road. The increase in traffic from operation of Alternative F would not double the traffic volume on Hwy 99; however this increase would result in an imperceptible 1.0 dBA Leq increase in the ambient noise level from Hwy 99. The existing ambient noise level at in the vicinity of the Mall site was measured at 52.4 dBA Leq (refer to **Section 3.11, Table 3.11-8**). With implementation of Alternative F and subsequent increase in traffic volumes, the ambient noise level at the sensitive receptors near Hwy 99 would be approximately 53.4 dBA Leq, which is less than the NAC of 67 dBA Leq for residential sensitive receptors (**Section 3.11, Table 3.11-3**) and the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**) and the City of Elk Grove's 60 dB residential threshold for transportation-related noise (City of Elk Grove, 2015). Therefore,

Alternative F would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Hwy 99.

### *Promenade Parkway*

Another source of noise in the vicinity of the Mall site is Promenade Parkway, located adjacent to the western boundary of the Mall site. As discussed in the TIA, (**Appendix O**), there are approximately 4098 vehicles per day on Promenade Parkway from Bilby Road to Kyler Road. Operation of Alternative F would add an estimated 3,796 vehicles per day to this roadway (**Appendix O**). The increase in traffic from operation of Alternative F would not double the traffic volume on either Promenade Parkway; however this increase would result in a 2.8 dBA Leq increase in the ambient noise level. The existing ambient noise level at in the vicinity of the roadway was measured at 52.4 dBA Leq (refer to **Section 3.11, Table 3.11-9**). With implementation of Alternative F and subsequent increase in traffic volumes, the ambient noise level would be 55.2 dBA Leq, both of which fall under the NAC of 67 dBA Leq for residential sensitive receptors (**Section 3.11, Table 3.11-3**) and the County of Sacramento's 65 dBA Leq residential threshold (**Section 3.11, Table 3.11-5**) and the City of Elk Grove's 60 dB residential threshold for transportation-related noise (City of Elk Grove, 2015). Therefore, Alternative F would not result in significant adverse effects associated with traffic noise levels for sensitive receptors located along Promenade Parkway.

### **Other Noise Sources**

Commercial uses on the Mall site would bring the possibility of noise due to operations of roof-mounted air handling units associated with building HVAC equipment in addition to noise from loading docks and surface parking lots. The noise levels produced by HVAC systems vary with the capacities of the units, as well as with individual unit design. In this case, HVAC systems on commercial buildings would be located at higher elevations than the surrounding residences, so that roof-mounted HVAC equipment has the potential to be heard at nearby sensitive noise receptors. Idling trucks at loading docks, proposed under Alternative F, have the potential to emit 80 dBA at 50 feet from the source. The proposed loading docks would be located along the eastern side of the casino/hotel structure.

Given the distance to the nearest sensitive noise receptor (approximately 1,500 feet) and the ambient noise associated with Hwy 99, noise from roof mounted HVAC equipment and the proposed loading docks would not be audible. Therefore, Alternative F operational equipment noise would not result in significant adverse effects associated with the ambient noise environment.

Alternative F paved surface parking lot and parking structure noise increases would be mainly due to slow moving and idling vehicles, opening and closing doors, and patron conversation. The noise level in parking lots and parking structures is generally dominated by slow moving vehicles; therefore, the ambient noise level in a parking structure and parking lots is approximately 60 dBA, which is less than the NAC of 67 dBA and does not exceed the City of Elk Grove's 60 dB residential threshold for

transportation-related noise (City of Elk Grove, 2015). Therefore, Alternative F internal vehicle noise levels would not result in significant adverse effects associated with the off-site ambient noise environment.

### **Operational Vibration**

Commercial and hotel uses do not include sources of perceptible vibration. Therefore, operation of Alternative F would not result in significant adverse effects associated with vibration.

#### **4.11.7 ALTERNATIVE G – NO ACTION**

Under the No Action alternative, a change in the current land use of the Twin Cities and Historic Rancheria sites are not reasonably foreseeable. None of the potential effects identified for Alternatives A through E are anticipated to occur. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts from noise would occur as with Alternative F as a result of the No Action alternative.

## 4.12 HAZARDOUS MATERIALS

This section assesses the significance of the direct effects related to hazardous materials that could result from the development of each alternative described in **Section 2.0**. Impacts associated with hazardous materials include impacts resulting from a release of hazardous materials and impacts from improper hazardous materials management. A project would be considered to have significant hazardous materials impacts if the project site has existing hazardous materials on-site that would require remediation prior to development of a proposed project. Additionally, if a project would result in the use, handling, or generation of a regulated hazardous material, of which the regulated amounts would increase the potential risk of exposure resulting in reduction of quality of life or loss of life, then the project would have a significant impact. Effects are measured against the environmental baseline presented in **Section 3.12**. Indirect and cumulative effects are identified in **Section 4.14** and **Section 4.15**, respectively. Measures to mitigate for adverse effects identified in this section are presented in **Section 5.12**.

### 4.12.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Construction

Although no major hazardous materials issues are known to be associated with the Twin Cities site, several minor issues have been identified that warrant further characterization prior to construction. These issues, including potential leaking fluids from agricultural pumps, household/agricultural waste, and soil discoloration near an agricultural area on the property. These issues are further discussed in **Appendix R**. Implementation of Alternative A could cause these areas to be disturbed during construction, and expose the environment or public to hazardous materials. Additionally, the possibility exists that undiscovered contaminated soil and/or groundwater is present on the site due to the migration of hazardous materials from off-site properties or unknown hazardous materials dumping. Although not anticipated, construction personnel could encounter contamination during construction-related earth moving activities. This could pose a risk to human health and/or the environment. Mitigation measures presented in **Section 5.12** would minimize or eliminate adverse effects from contaminated soil or groundwater.

During grading and construction, the use of hazardous materials may include substances such as gasoline, diesel fuel, motor oil, hydraulic fluid, solvents, cleaners, sealants, welding flux, various lubricants, paint, and paint thinner. These materials would be used for operation and maintenance of equipment, and directly in the construction of the facilities. Fueling and oiling of construction equipment would be performed daily. The most likely possible hazardous materials releases involve the dripping of fuels, oil, and grease from construction equipment. Typical construction management practices limit and often eliminate the effect of such accidental releases including the use of storage areas that are not exposed to rainwater. An accident involving a service or refueling truck would present the worst-case scenario for the release of a hazardous substance. Depending on the relative hazard of the hazardous material, if a spill of significant quantity were to occur, the accidental release could pose a hazard to construction

employees as well as the to the environment. This impact is potentially significant. The U.S. Environmental Protection Agency (USEPA) National Pollution Discharge Elimination System (NPDES) storm water program requires coverage under the Phase II General Permit for Storm Water Discharge from Construction Activities (Construction General Permit). The USEPA requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) whenever one or more acres are disturbed during construction activities. The SWPPP is a requirement that ensures overall Clean Water Act (CWA) compliance for both hazardous materials and sediment laden stormwater that could potentially affect the environmental quality of the site. Surface water impacts are discussed further in **Section 4.3**. Mitigation measures intended to reduce potential surface water quality impacts are provided in **Section 5.12**, including the preparation of a Spill Prevention Control Plan. Through the implementation of mitigation, the Tribe would ensure potential hazardous materials impacts from construction activity are reduced to less than significant levels. Hazardous materials mitigation is included in **Section 5.12** to reduce potential impacts to less than significant levels.

## **Operation**

As discussed in **Section 3.12**, the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) regulations include provisions that require facilities to document the potential risk associated with the storage, use, and handling of toxic and flammable substances. OSHA regulations are codified in 29 Code of Federal Regulations (CFR) Part 1910 and are applicable to the project site.

Diesel fuel storage tanks will be needed for the operation of emergency generators provided for the casino development and potential wastewater treatment plant (WWTP). Generators would be located in areas that are easily accessible to maintenance and emergency personnel. The transport of diesel fuel would not be infrequent and is not likely to present a significant hazard to the public. Improper storage of diesel fuels could create a potentially significant risk of soil and groundwater contamination. Mitigation included in **Section 5.12** would reduce impacts to less than significant levels.

Should an on-site WWTP be developed under Alternative A, the WWTP would typically require the delivery, storage, and use of hazardous materials, particularly the use of sodium hypochlorite (bleach) and citric acid. For the proposed wastewater treatment plant, a weak (five percent strength) solution of sodium hypochlorite would be used to clean or inhibit biological growth in the immersed membranes used to filter out solids. Citric acid may be used to clean filters. Sodium hypochlorite would be stored in a 55-gallon drum, within a chemical spill containment area inside the wastewater treatment plant building. Citric acid would be purchased in dry form in 40-pound sacks. A 50-gallon mixing tank inside the wastewater treatment plant would be used to prepare the liquid citric acid solution. Both the sodium hypochlorite and the citric acid would be pumped directly to a chemical dip tank when required for use. With proper handling and storage of chemicals, no significant impacts are anticipated as a result of the proposed on-site WWTP.

The storage and use of swimming pool chemicals would be necessary for operation of the hotel swimming pool facility. Generally, liquid chlorine and liquid muriatic or dry granular sodium bisulfate are the primary pool chemicals that would be utilized. The materials would be stored within a secured building and only used by qualified personnel, minimizing the chance of impacts to human health and the environment. As such, no significant impacts resulting from the use, storage, and transportation of swimming pool chemicals would occur.

Project-related use, transport, and storage of landscape chemicals (fertilizers, herbicides, pest control chemicals), would be limited to infrequent transport for use onsite. Although the transport of these materials would occur in relatively small amounts, their transport would be governed by federal and State laws to ensure proper transport occurs, thus minimizing the chance of impacts to human health and the environment. Nevertheless, if not managed properly, the presence of landscape chemicals could pose a risk to employees and casino patrons. With appropriate management, no impacts are anticipated to result from the use of landscape chemicals.

During operation of the facilities proposed under Alternative A, the majority of waste produced would be non-hazardous. The small quantities of hazardous materials that would be utilized include motor oil, hydraulic fluid, solvents, cleaners, lubricants, paint, and paint thinner. These materials would be utilized for the operation and maintenance of the casino and other project facilities. The amount and types of hazardous materials that would be generated are common to commercial sites and do not pose unusual storage, handling or disposal issues. Materials would be stored, handled, and disposed of according to state, federal, and manufacturer's guidelines. Therefore, operation of Alternative A would not result in significant adverse effects associated with hazardous waste produced.

#### **4.12.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

##### **Construction**

Alternative B is similar to Alternative A, except with the exception that casino development would be on a reduced scale. Although not anticipated, construction personnel could encounter contamination during construction-related earth moving activities. The recommended measures presented in **Section 5.12** would further minimize or eliminate adverse effects during construction.

The amount and types of hazardous materials that would be stored, used, and generated during the construction of Alternative B would be similar as those described under Alternative A. As discussed in above under Alternative A, mitigation measures for the storage and handling of hazardous materials are provided in **Section 5.12**. Adherence to these mitigation measures would minimize the risk of inadvertent release and, in the event of a contingency, minimize adverse effects. With these measures, Alternative B would not result in significant adverse effects associated with hazardous materials during construction activities.

## **Operation**

The types of hazardous materials that would be used, generated, and stored during the operation of Alternative B would be similar to those of Alternative A. Refer to **Section 4.12** for a description of potentially significant effects resulting from hazardous materials usage and storage during project operation. After implementing the mitigation in **Section 5.12**, Alternative B would result in less than significant effects associated with hazardous materials.

### **4.12.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

#### **Construction**

Alternative C would consist of non-gaming retail development similar in size to Alternative A. Similar to Alternative A, the possibility exists that undiscovered contaminated soil and/or groundwater exists on the site. Although not anticipated, construction personnel could encounter contamination during construction-related earth moving activities associated with Alternative C. The recommended measures presented in **Section 5.12** would further minimize or eliminate adverse effects during construction of Alternative C.

The types of hazardous materials that would be stored, used, and generated during the construction of Alternative C would be similar to those described under Alternative A; however the amount would be minimal due to the reduction in the size of Alternative C development components. As discussed under Alternative A, above, mitigation measures for the storage and handling of hazardous materials are provided in **Section 5.12**. Adherence to these mitigation measures would minimize the risk of inadvertent release and, in the event of a contingency, minimize adverse effects.

#### **Operation**

The types and amounts of hazardous materials that would be used, generated, and stored during the operation of Alternative C would be similar to those of Alternative A. Refer to **Section 4.12**, above, for a description of potentially significant effects resulting from hazardous materials usage and storage during operation of a retail development. Mitigation is included in **Section 5.12** to reduce potentially significant effects from the use of hazardous materials during the operation of the casino resort to less than significant levels.

### **4.12.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE**

#### **Construction**

Alternative D would consist of developing a gaming facility on the Historic Rancheria site. The possibility exists that undiscovered contaminated soil and/or groundwater exists on the Historic Rancheria site. Although not anticipated, construction personnel could encounter contamination during construction-related earth moving activities associated with Alternative D. The recommended measures

presented in **Section 5.12** would further minimize or eliminate adverse effects during construction of Alternative D.

Alternative D would include the removal and disturbance of soil. The Historic Rancheria site is pastoral in nature, and therefore would not have experienced substantial pesticide use. No reported past or current pesticide contaminations have been reported for the Historic Rancheria site or in the immediate vicinity. Therefore, no environmental effects associated with agricultural chemicals are anticipated.

The types of hazardous materials that would be stored, used, and generated during the construction of Alternative D would be similar to those described under Alternative A. As discussed under Alternative A, above, mitigation measures for the storage and handling of hazardous materials are provided in **Section 5.12**. Adherence to these mitigation measures would minimize the risk of inadvertent release and, in the event of a contingency, minimize adverse effects. With these measures, Alternative D would not result in significant adverse effects associated with hazardous materials during construction.

## **Operation**

The types of hazardous materials that would be used, generated, and stored during the operation of Alternative D would be similar to those of Alternative A, with the exception of the WWTP. Refer to **Section 4.12** for a description of potentially significant effects resulting from hazardous materials usage and storage during project operation. Mitigation is included in **Section 5.12** to reduce potentially significant effects from the use of hazardous materials during the operation of the casino resort to less than significant levels.

### **4.12.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

#### **Construction**

Alternative E would consist of the development of a gaming facility on the Historic Rancheria site, similar in size and scope to Alternative B. The possibility exists that undiscovered contaminated soil and/or groundwater exists on the Historic Rancheria site. Although not anticipated, construction personnel could encounter contamination during construction-related earth moving activities associated with Alternative E. The recommended measures presented in **Section 5.12** would further minimize or eliminate adverse effects during construction of Alternative E.

The types of hazardous materials that would be stored, used, and generated during the construction of Alternative E would be similar to those described under Alternative A; however the amount would be minimal due to the reduction in the size of Alternative E development components. As discussed under Alternative A, above, mitigation measures for the storage and handling of hazardous materials are provided in **Section 5.12**. Adherence to these Best Management Practices (BMPs) would minimize the risk of inadvertent release and, in the event of a contingency, minimize adverse effects.

## **Operation**

The types of hazardous materials that would be used, generated, and stored during the operation of Alternative E would be similar to those of Alternative A. Refer to **Section 4.12.1** for a description of potentially significant effects resulting from hazardous materials usage and storage during project operation. Mitigation is included in **Section 5.12** to reduce potentially significant effects from the use of hazardous materials during the operation of the casino to less than significant levels.

### **4.12.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

#### **Construction**

Alternative F consists of the development of a gaming facility on the Elk Grove Mall site (Mall site) in the incorporated City of Elk Grove, in Sacramento County, California. It would involve a development similar in size and scope to Alternative A with the exception that no on-site WWTP would be developed. The possibility exists that undiscovered contaminated soil and/or groundwater exists on the site. Although not anticipated, construction personnel could encounter contamination during construction-related earth moving activities associated with Alternative F. The recommended measures presented in **Section 5.12** would further minimize or eliminate adverse effects during construction of Alternative F.

The types of hazardous materials that would be stored, used, and generated during the construction of Alternative F would be similar to those described under Alternative A; however the amount would be minimal due to the reduction in the size of Alternative F development components. As discussed under Alternative A, above, mitigation measures for the storage and handling of hazardous materials are provided in **Section 5.12**. Adherence to these mitigation measures would minimize the risk of inadvertent release and, in the event of a contingency, minimize adverse effects.

#### **Operation**

The types of hazardous materials that would be used, generated, and stored during the operation of Alternative F would be similar to those of Alternative A, with the exception that no on-site WWTP would be developed. Refer to **Section 4.12.1** for a description of potentially significant effects resulting from hazardous materials usage and storage during project operation. Mitigation is included in **Section 5.12** to reduce potentially significant effects from the use of hazardous materials during the operation of Alternative F to less than significant.

### **4.12.7 ALTERNATIVE G – NO ACTION**

Existing uses would continue under the No Action alternative at the Twin Cities site and the Historic Wilton Rancheria site. The existing conditions on these two sites, in addition to the potential of hazardous spills associated with adjacent properties identified in **Section 3.12**, would continue. However, the identified materials and risk were not significant. Therefore, no effects from the use, storage, or handling of hazardous materials would result from the No Action alternative on these two sites.

However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts from hazardous materials would occur as with Alternative F as a result of the No Action alternative.

## 4.13 AESTHETICS

This section assesses the significance of the direct effects associated with aesthetics that would result from the development of each alternative described in **Section 2.0**. The criteria for assessing the significance of the alternative on aesthetics weighs effects to local and regional aesthetic values and analyzes if the project implementation degrade or diminish aesthetics of visual resources such as scenic vistas, or introduce lighting that would increase glare or substantially affect nighttime view of dark skies. Effects are measured against the environmental baseline presented in **Section 3.13**. Cumulative and indirect effects are identified in **Section 4.15** and **Section 4.14**, respectively. Measures to mitigate for adverse effects identified in this section, if warranted, are presented in **Section 5.13**.

### 4.13.1 ALTERNATIVE A – TWIN CITIES CASINO RESORT

#### Construction Impacts

During construction activities on the Twin Cities site, equipment and material staging for construction would take place in the northeastern corner of the site. During this time, heavy construction equipment, materials, and work crews would be readily visible from stationary locations, as well as from vehicles traveling along West Stockton Boulevard and State Route 99 (Hwy 99); however, views of construction may be partially blocked by vegetation. Aesthetic impacts from construction would be temporary in nature and would not result in obstructed views of scenic resources. Therefore, construction of Alternative A would not result in significant adverse effects associated with visual resources.

#### Operational Impacts

Development of Alternative A would encompass approximately 76 acres of the Twin Cities site and would consist of construction of a casino and 12-story hotel. The height of the hotel tower would be approximately 275 feet. An architectural rendering of Alternative A is presented as **Figure 2-2**, and an overlay of the current viewsheds with a scaled rendition of the proposed buildings, including the hotel's two-story (15-foot) high windows, is shown in **Figure 4.13-1**. The proposed casino/hotel resort has been designed to avoid architectural features, such as the extensive use of neon, which may be incompatible with the existing visual setting. Instead, native building materials such as stone and the use of earth tones in paints and coatings have been utilized extensively in the project design.

No designated aesthetic resources are present in the vicinity of the Twin Cities site with the exception of Hwy 99, which is designated under the Sacramento County (County) General Plan as an aesthetic corridor (Sacramento County, 2011). Since Hwy 99 is adjacent to the Twin Cities site, motorists will generally have unobstructed views of the proposed development.

Alternative A would transform the current agricultural property to one more urban in appearance. However, the development of Alternative A on the Twin Cities site would not be visually incompatible with urban development currently existing in the immediate vicinity along the Hwy 99 corridor.



**VIEWSHED A:** Looking northwest towards Twin Cities Site



**VIEWSHED B:** Looking southwest towards Twin Cities Site

Alternative A would result in a visually cohesive development that may be considered more aesthetically pleasing than other regional commercial strip development; it would considerably increase the level of human-made elements on the existing landscape of the Twin Cities site, which has already been modified by agricultural use and cellular towers. Though the proposed development would alter the colors, lines, and texture of the landscape vegetation of the Twin Cities site, the changes would not be out of character with typical roadside development adjacent to Highway 99, would not affect any sensitive visual resources, and would therefore have a less than significant aesthetic impact. Additionally, mitigation is included in **Section 5.13** to further reduce aesthetic impacts.

### ***Effects on Viewsheds Surrounding the Project***

As discussed in **Section 4.9**, Land Use, the visual change is inconsistent with the current County Agricultural zoning designation of the Twin Cities site; however, the City of Galt General Plan anticipates that the site and surrounding properties located to the north of the City (within the City Sphere of Influence (SOI) area) will eventually be developed for commercial and industrial land uses. Thus, the commercial nature of the casino resort proposed under Alternative A is not inconsistent with long-range plans for the Twin Cities site. **Section 3.13** describes the viewsheds surrounding the Twin Cities site. Analysis of potential impacts to the viewsheds (modeled in **Figure 4.13-1**) resulting from Alternative A is presented below.

#### ***Viewpoint A***

Viewpoint A represents a viewshed from the south of the Twin Cities site experienced by commuters traveling north on Hwy 99. The viewshed from Viewpoint A would change from one of rural open space to one with commercial development consisting of the casino facility and hotel tower.

This change would represent a major alteration; however, it would not affect any designated scenic resources. Additionally, travelers on Hwy 99 would only be exposed to views of the hotel tower for a short time due to the high travel speeds. A significant adverse visual effect would not occur from this viewpoint. Mitigation provided in **Section 5.13** would further reduce the potential for adverse effects.

#### ***Viewpoint B***

Viewshed B represents a viewshed from the north of the Twin Cities site. This viewshed is experienced by commuters traveling south on Hwy 99. The viewshed is characterized by flat farmland and a power pole. The view from nearby roads would change from one of mostly open space and rural development to one containing commercial development consisting of a casino-resort complex.

While this change would represent an alteration, there are no scenic resources that would be affected, and travelers would only experience the altered view for a short time due to high motorist speeds. Therefore, a less than significant impact would occur for Alternative A. Mitigation is provided in **Section 5.13** to reduce this impact even further.

### ***Shadow, Light, and Glare***

A significant effect from shadows would result if the proposed development were to cast a shadow on private residences or public areas for substantial portions of the day. The nearest buildings off-site are residences to the south. The direction of the sunrise will vary from east to southeast throughout the year; the direction of the morning shadow from the hotel will vary from west to northwest, accordingly. In the late afternoon, the casino-resort facility may briefly cast a shadow over the east and northeast during certain times of the year. However, the shadow from the development would not result in significant adverse effects to nearby residences since the casino structures are located in the northern portion of the site, away than the easterly residences, causing any possible shadows to be cast over the residences for only a brief amount of time before sunset.

Alternative A would introduce new sources of light into the existing setting. Light spillover into surrounding areas and increases in regional ambient illumination could result in potentially significant effects if it were to cause traffic safety issues or create a nuisance to sensitive receptors. Alternative A would have lighting fixtures as an integral part of the overall design, strategically positioned to minimize any direct lines of sight or glare to the public. Exterior signage would enhance the buildings' architecture and the natural characteristics of the site by incorporating natural materials in combination with architectural trim. Illuminated signs would be designed to blend with the light levels of the building and landscape lighting in both illumination levels and color characteristics. Parking lot lighting would consist of pole-mounted lights approximately 25 feet tall. Parking lot lighting would be high pressure-sodium with cut-off lenses and downcast illumination. Illuminated signage and light from occupied hotel rooms would also be visible from surrounding areas at night and has the potential to significantly alter the off-Reservation nighttime lighting environment. To minimize the potential for significant adverse effects, mitigation is included in **Section 5.13**; with this mitigation, impacts from shadow, light, and glare would be less than significant.

Likewise, the use of glass panels and reflective ornamental detailing in the project design, including the proposed hotel tower, could increase the glare to aircraft operations, travelers on Hwy 99, and adjacent residences. Therefore the potential for Alternative A to produce glare in the project vicinity is a potentially significant adverse effect. Mitigation measures in **Section 5.2.12** are consistent with the International Dark-Sky Association's Model Lighting Ordinance (IDA, 2011) and would reduce this potential impact to a less than significant level.

## **4.13.2 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

### **Construction Impacts**

The development proposed under Alternative B would result in similar, yet less intensive, construction on the Twin Cities site as Alternative A. The main visual element, the 12-floor hotel tower, would not be developed under Alternative B. Equipment and material staging would occur on-site and be visible from stationary locations in neighboring residential and commercial use areas, as well as from vehicles along

the primary travel routes near the Twin Cities site. Aesthetic-related impacts from construction would be temporary in nature and would not result in obstructed views of scenic resources. Therefore, construction of Alternative B would not result in significant adverse effects associated with visual resources.

### **Operational Impacts**

Impacts to viewsheds resulting from Alternative B would be similar, although lessened, when compared with Alternative A. The removal of the approximately 275-foot high hotel tower, in particular, would lessen the visual impact of Alternative B from surrounding viewpoints. Alternative B, in relation to the larger environment of the highly developed Hwy 99 corridor, would cause a less than significant visual impact because the changes would not affect any sensitive visual resources. Mitigation provided in **Section 5.13** would further reduce the potential for adverse effects.

#### ***Effects on Viewsheds Surrounding the Project***

Effects on viewsheds surrounding the Twin Cities site would be similar to those discussed under Alternative A; however, there would be no hotel tower. As described under Alternative A, the views of the Twin Cities site would change from one of open space and agricultural areas, to one of commercial development consisting of a casino development. Construction of Alternative B would result in significant alteration of existing rural viewsheds; however, Alternative B would be partially screened by existing development and landscaping and would be compatible with the existing commercial development along the Hwy 99 corridor. To reduce the potential for adverse visual effects, mitigation is provided in **Section 5.13**, including screening for existing residences near the Twin Cities site.

#### ***Shadow, Light, and Glare***

Under Alternative B, the majority of structures within the casino development would be one story, limiting the potential for shadows to be cast on nearby residences. Alternative B would not result in significant adverse effects associated with shadows.

The development of Alternative B would introduce new sources of light and glare as described under Alternative A. Through the use of downcast and directed lighting and strategically positioned lighting fixtures, the impacts of lighting off-site would be minimized. With the mitigation measures provided in **Section 5.13**, which are consistent with the International Dark-Sky Association's Model Lighting Ordinance (IDA, 2011), Alternative B would not result in significant effects associated with light emissions and glare.

### **4.13.3 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

#### **Construction Impacts**

Development under Alternative C would result in similar construction activity to Alternative A due to the similar scale of proposed development. No multi-story structures are proposed under Alternative C.

Equipment and material staging would occur on-site and be visible from stationary locations in neighboring residential and commercial use areas, as well as from vehicles traveling along the primary travel routes near the Twin Cities site. However, views of this construction would be partially or wholly blocked by existing vegetation and/or structures. Aesthetic-related impacts from construction would be temporary in nature and would not result in obstructed views of scenic resources. Therefore, construction of Alternative C would not result in significant adverse effects associated with visual resources.

### **Operational Impacts**

The features of Alternative C would be similar to those described under Alternative A. Under Alternative C, the design of the project includes large-scale commercial space instead of gaming. In addition, the absence of the 275-foot high hotel tower, in particular, would lessen the visual impact of Alternative C from surrounding viewpoints. The proposed retail development in the context of the larger commercial landscape along the highly developed Hwy 99 corridor would be less than significant.

#### ***Effects on Viewsheds Surrounding the Project***

Effects on viewsheds surrounding the Twin Cities site under Alternative C would be similar to those discussed under Alternative A, with the exception of the hotel tower, which would not be present under Alternative C. As described under Alternative A, the views of the Twin Cities site would change from one of open space and agricultural areas, to one of commercial development consisting of large-scale commercial and retail structures. Construction of Alternative C would result in significant alteration of existing rural viewsheds; however, Alternative C would be partially screened by existing development and landscaping and would blend into the existing retail/commercial development along the Hwy 99 corridor. Mitigation is provided in **Section 5.13**, including screening for residences in the vicinity of the Twin Cities site, to reduce the potential for adverse visual effects.

#### ***Shadow, Light, and Glare***

Under Alternative C, the majority of structures within the retail/commercial development would be one story, limiting shadows cast on residences in the vicinity. Alternative C would not result in significant adverse effects associated with shadows.

The development of Alternative C would introduce new sources of light and glare as described under Alternative A. Through the use of downcast and directed lighting and strategically positioned lighting fixtures, the impacts of off-site lighting would be minimized. With mitigation provided in **Section 5.13**, consistent with the International Dark-Sky Association's Model Lighting Ordinance (IDA, 2011), Alternative C would not result in significant adverse effects associated with light emissions and glare.

#### 4.13.4 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE

##### Construction Impacts

Development under Alternative D would result in construction activities on the 75-acre Historic Rancheria site. Equipment and material staging would occur on-site and be visible from stationary locations surrounding the site, as well as from vehicles traveling along Green Road. However, views of this construction would be partially or wholly blocked by existing vegetation and/or structures. Aesthetic-related impacts from construction would be temporary in nature and would not result in obstructed views of scenic resources. Therefore, construction of Alternative D would not result in significant adverse effects associated with visual resources.

##### Operational Impacts

Under Alternative D, the design of the casino resort would be similar to Alternative A, as all proposed buildings would have the same design, height, and general appearance. Though the development of Alternative D would transform the current rural setting to one with a more urban appearance, Alternative D would not be visually incompatible with County land use designations currently on and in the immediate vicinity of the site.

Alternative D would result in a visually cohesive development that may be more aesthetically pleasing than other regional commercial development. Alternative D would also increase the level of human-made elements on the existing landscape of the Historic Rancheria site, which has already been modified by agricultural use. Though the proposed development would alter the colors, lines, and texture of the landscape vegetation currently on-site, the site-specific visual effects would not be significant. The project development in relation to the larger landscape would not be significant because the changes would not adversely affect the visual character of the immediate area. Mitigation specified in **Section 5.13** would further reduce visual effects.

##### ***Effects on Viewsheds Surrounding the Project***

**Section 3.13** describes the viewsheds surrounding the Historic Rancheria site. Analysis of potential impacts to the viewsheds resulting from Alternative D is provided below.

##### *Viewpoint A*

Viewpoint A represents a viewshed experienced by the two residences to the immediate south of the Historic Rancheria site along Danlar Court. These residences would experience altered views of the Historic Rancheria site under Alternative D due to their close proximity. The landscaping along Green Road includes large trees and bushes and power lines, which would serve as partial screening of Alternative D. The view from these residences would change from one of open rural spaces and residential areas, to one of commercial development consisting of the casino and hotel complex. Mitigation provided in **Section 5.13** would reduce potential impacts.

### *Viewpoint B*

Viewpoint B represents a viewshed experienced by residences and travelers along Green Road southeast of the Historic Rancheria site. This viewpoint is located approximately 0.7 miles east of the site along Green Road. Views are dominated by undeveloped grasslands, rural residences, oak trees, and overhead power lines. The view from this location would change from one of open rural spaces and residential areas to one of commercial development consisting of the casino and hotel complex. Mitigation provided in **Section 5.13** would reduce potential effects to sensitive receptors from Viewpoint B.

### *Viewpoint C*

Viewpoint C represents a viewshed experienced by residential communities at the Fog Willow Farms Park to the west of the Historic Rancheria site. Views from this area are dominated by grassland and residential development. The views of the Historic Rancheria site are partially obscured by oak trees. Alternative D would result in alteration of the existing rural viewshed; however, Alternative D would be partially screened by trees. Mitigation that would further reduce visual effects is provided in **Section 5.13**.

### *Viewpoint D*

Viewpoint D represents a viewshed experienced by residences and travelers along Wilton Road, approximately 1.0 miles south of the Historic Rancheria site. Views are currently dominated by rural residences, undeveloped grassland, overhead utility lines, and trees. The view from these residences would change from one of open space and rural development, to one of commercial development consisting of the casino-resort complex. Mitigation provided in **Section 5.13** would reduce potential effects to sensitive receptors from Viewpoint D.

### ***Shadow, Light, and Glare***

A significant effect from shadows would result if the proposed development were to cast a shadow on private residences or public areas for substantial portions of the day. The nearest buildings off-site are residences to the south and east as described above as Viewpoint A and Viewpoint B. The direction of the sunrise will vary from east to southeast throughout the year; the direction of the morning shadow from the hotel would vary from west to northwest, accordingly. In the late afternoon, the casino-resort facility may briefly cast a shadow to the east and northeast during certain times of the year. However, the shadow from the development would not result in significant adverse effects to nearby residences since the casino and resort structures are located further north than the easterly residences, causing any possible shadows to be cast over the residences for only a brief amount of time before sunset.

As with Alternative A, Alternative D would introduce new sources of light into the existing setting. Light spillover into surrounding areas and increases in regional ambient illumination could result in significant adverse effects or create a nuisance to sensitive receptors. The following would be incorporated into the design of Alternative D: downcast lighting in the landscaped and parking areas to minimize off-site

scatter; strategically positioned lighting fixtures to minimize any direct sight lines or glare; exterior signage would enhance the buildings' architecture and the natural characteristics of the site by incorporating native materials in combination with architectural trim; and illuminated signs would be designed to blend with the light levels of the building and landscape lighting in both illumination levels and color characteristics. Through the use of downcast and directed lighting, and strategically positioned lighting fixtures, the impacts of lighting off-site would be minimized. With the mitigation provided in **Section 5.13**, which is consistent with the County's Lighting Ordinance, potential impacts would be further reduced.

#### **4.13.5 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

##### **Construction Impacts**

The mixed development proposed under Alternative E would result in similar, yet less intensive, construction on the Historic Rancheria site as Alternative D. Equipment and material staging would occur on-site and be visible from stationary locations in neighboring residential and commercial use areas, as well as from vehicles along the primary travel routes near the site. However, views of this construction would be partially or wholly blocked by existing vegetation and/or structures. Aesthetic-related impacts from construction would be temporary in nature and would not result in obstructed views of scenic resources. Therefore, construction of Alternative E would not result in significant adverse effects associated with visual resources.

##### **Operational Impacts**

Under Alternative E, the design of the project would be similar to Alternative D; however, the main visual element, the 12-floor hotel tower structure would not be developed under Alternative E. Though the development of Alternative E would transform the current agricultural space to one with a more urban appearance, the development of Alternative E would not be visually incompatible with County land use designations currently existing in the immediate vicinity of the site as most land use is currently agricultural and rural residential.

Alternative E would result in a visually cohesive development that may be more aesthetically pleasing than other regional commercial strip development. Alternative E would increase the level of human-made elements on the existing landscape of the Historic Rancheria site, which has already been modified by agricultural use. Though the proposed development would alter the colors, lines, and texture of the landscape vegetation currently located on the site, the site-specific visual effects would not be significant. The project development in relation to the larger landscape would not be significant because the changes would not adversely affect the visual character of the immediate area. Mitigation specified in **Section 5.13** would further reduce potential impacts.

### ***Effects on Viewsheds Surrounding the Project***

Effects on viewsheds surrounding the project would be similar, to those discussed under Alternative E; however, there would be no hotel tower. As described under Alternative D, the views of the Historic Rancheria site would change from one of open rural and residential areas to one of commercial development consisting of a casino set amidst a planned landscape and retail buildings. Construction of Alternative E would result in alteration of existing rural viewsheds; however, Alternative B would be partially screened by existing landscaping. Mitigation is provided in **Section 5.13** to further reduce potential impacts.

### ***Shadow, Light, and Glare***

As with Alternative B, under Alternative E, the majority of structures within the development would be one story, which would limit shadows cast on nearby residences. As such, Alternative E would not result in significant effects associated with shadows.

The development of Alternative E would introduce new sources of light and glare as described under Alternative D. Through the use of downcast and directed lighting and strategically positioned lighting fixtures, the impacts of lighting off-site would be minimized. With the mitigation measures provided in **Section 5.13**, which are consistent with the International Dark-Sky Association's Model Lighting Ordinance (IDA, 2011), Alternative E would not result in significant adverse effects associated with light emissions and glare.

## **4.13.6 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

### **Construction Impacts**

Development under Alternative F would result in construction activity similar to Alternative A due to the similar scale of proposed development. The presence and high visibility of construction equipment and activities would remain visible to neighboring commercial areas and travelers on Hwy 99. Aesthetic-related impacts from construction would be temporary in nature and would not result in obstructed views of scenic resources. Therefore, construction of Alternative F would not result in significant adverse effects associated with visual resources

### **Operational Impacts**

The design and features of Alternative F would be similar to those described under Alternatives A and C in general height and appearance; however, the exterior design would be different so as to be compatible and complimentary with adjacent commercial development. Alternative F would be consistent with the current commercial and retail character of the site, and would be visually compatible with City of Elk Grove land use designations for the property, adjacent commercial/retail development (**Section 2.6**), and the surrounding area. Exterior signage facing Highway 99 would be integrated into the parking structure design. Therefore, aesthetic impacts would be less than significant. Mitigation measures listed in listed

in **Section 5.13** would further reduce impacts from Alternative F. An architectural rendering of Alternative F is presented in **Figure 4.13-2** from the viewpoint of Viewshed D (Highway 99) and discussed below.

### ***Effects on Viewsheds Surrounding the Project***

**Section 3.13** describes the viewsheds surrounding the Mall site. Existing views of the site from all angles consist of weed-covered parking lots and vacant partially completed buildings. The Mall site is adjacent to a major transportation corridor (Highway 99) that is interspersed with prominent commercial and industrial buildings of various types. The tallest structure under Alternative F would be the 12-story hotel, which, along with other buildings under Alternative F, would be designed and landscaped complementary to the adjacent retail development that is/will be designed pursuant to LRSPA building regulations. This complementary design would ensure Alternative F would be aesthetically cohesive with its surroundings. Therefore, aside from a singular increase above maximum allowable height under the LRSPA (100 feet), Alternative F would be compatible with LRSPA building requirements. Given the existing conditions of the Mall site and planned design of proposed development and relative compatibility with building regulations in the LRSPA, a less-than-significant impact to viewsheds would occur. Additional discussion of potential impacts to the individual viewsheds resulting from Alternative F is provided below.

#### ***Viewpoint A***

Viewpoint A represents a view looking east from the entrance to the Mall site near the intersection of Promenade Parkway and Lent Ranch Parkway, experienced by motorists passing by on Promenade Parkway. Alternative F would represent a positive impact to existing visual resources, as it would result in a visually cohesive development that would be more aesthetically pleasing than the current partially completed commercial development. A significant adverse visual effect would not occur from this viewpoint. Mitigation provided in **Section 5.13** would further reduce the potential for adverse effects.

#### ***Viewpoint B***

Viewpoint B represents a view looking northeast towards the Mall site, experienced by travelers traveling north on Promenade Parkway. The viewpoint is located near the Lent Ranch Parkway and Promenade Parkway intersection looking into the area of the site.

Alternative F would create a positive visual impact, as it would result in a visually cohesive development that would be more aesthetically pleasing than the current partially completed, vacant mall. Therefore, a significant adverse visual effect would not occur from this viewpoint. Mitigation provided in **Section 5.13** would further reduce the potential for adverse effects.



**Viewshed D (Hwy 99):** Looking west toward Elk Grove Mall Site

### *Viewpoint C*

Viewpoint C represents a northward view from the Mall site, experienced by commuters on nearby roads. The viewpoint is located south of the Kaiser building, which is located approximately 0.2 miles north of the site. Alternative F would create a positive impact on the existing viewshed, as it would result in a visually cohesive development that would be more aesthetically pleasing than the existing stalled commercial development. Therefore, a significant adverse visual effect would not occur from this viewpoint. Mitigation provided in **Section 5.13** would further reduce the potential for adverse effects.

### *Viewpoint D*

Viewpoint D represents a viewshed looking west from Hwy 99. The viewshed is primarily experienced by motorists traveling south on Hwy 99. Alternative F would create a positive visual impact, as it would result in a visually cohesive development that would be more aesthetically pleasing than the current partially completed, vacant buildings. Therefore, a significant adverse visual effect would not occur from this viewpoint. Mitigation provided in **Section 5.13** would further reduce the potential for adverse effects.

### ***Shadow, Light, and Glare***

A significant effect from shadow would result if the proposed development were to cast a shadow on private residences or public areas for substantial portions of the day. The nearest buildings off-site are located north of the site. The direction of the sunrise will vary from east to southeast throughout the year; the direction of the morning shadow from the hotel would vary from west to northwest, accordingly. In the late afternoon, the casino-resort facility may briefly cast a shadow over the east and northeast during certain times of the year. However, the shadow from the development would not result in adverse effects to nearby buildings since the casino and resort structures are not located near any easterly buildings.

Alternative F would introduce new sources of light into the existing setting; however, current lighting infrastructure is present on the Elk Grove Mall Site. The following would be incorporated into the design of Alternative F: downcast lighting would be used in the landscaped and parking areas to minimize off-site scatter; lighting fixtures would be an integral part of the overall design and strategically positioned to minimize any direct sight lines or glare to the public; exterior signage would enhance the buildings' architecture by incorporating architectural trim; and illuminated signs, such as that on the parking garage, would be designed to blend with the light levels of the building and landscape lighting in both illumination levels and color characteristics. Through the use of downcast and directed lighting, and strategically positioned lighting fixtures, the impacts of lighting off-site would be minimized. With the mitigation provided in **Section 5.13**, which is consistent with the Elk Grove's Lighting Ordinance, impacts would be reduced to a less than significant level.

#### **4.13.7 ALTERNATIVE G – No ACTION**

No impacts would occur to visual resources under the No Action alternative for the Twin Cities site and the Historic Wilton Rancheria site. The visual environment on the Twin Cities and Historic Rancheria sites would remain the same. However, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses; therefore, comparable impacts to the visual environment would occur as with Alternative F as a result of the No Action alternative.

## 4.14 INDIRECT AND GROWTH-INDUCING EFFECTS

The Council on Environmental Quality (CEQ) Regulations for Implementing the National Environmental Policy Act (NEPA) require that an Environmental Impact Statement (EIS) analyze both the indirect and the “growth-inducing” effects of a proposed project (40 Code of Federal Regulations (CFR) Section 1502.16 [b], 40 CFR Section 1508.8 [b]).

*...indirect effects...are caused by the action and are later in time or farther removed in the distance, but are still reasonably foreseeable. Indirect effects may include ‘growth inducing effects’ and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on ...natural systems.*

Direct impacts, caused by the action and occurring at the same time and place as the action, have been discussed in **Sections 4.2** through **4.13**, and cumulative impacts measured in conjunction with other reasonably foreseeable projects, whether past, present, or future, are addressed in **Section 4.15**. The potential indirect effects of off-site traffic mitigation and utility/infrastructure improvements integral to the development of Alternatives A, B, C, D, E, and F are discussed independently in **Sections 4.14.1** and **4.14.2**, respectively, as they are distinctly separated in time and/or space from the proposed alternatives. Growth inducing effects are also discussed independently in **Section 4.14.3** since they are a distinct subset of indirect effects. Potential indirect effects associated with proposed alternatives would be minimized to a less than significant level through project design and recommended measures presented in **Chapter 5.0**. In addition, off-site improvements may require obtaining approvals and permits from jurisdictional agencies, including potential California Environmental Quality Act (CEQA) compliance.

### 4.14.1 INDIRECT EFFECTS FROM OFF-SITE TRAFFIC MITIGATION IMPROVEMENTS

A detailed description of off-site traffic mitigation recommended for Alternatives A, B, C, D, E, and F is provided in **Section 5.8**. The mitigation measures that would require construction to widen/improve intersection approaches, add lanes, and install traffic signals and/or roundabouts would require grading and the introduction of fill material. Construction of these improvements could generate indirect impacts in several areas, which are discussed below under each issue area.

Surveys of the potentially affected areas for these proposed traffic mitigation sties were conducted by AES biologist Nicholas Bonzey and AES archaeologist Charlane Gross on July 20, 2015. These surveys were conducted on foot where safe, and from the car on busy and narrow sections of the roads. Resources with the potential to be disturbed during off-site traffic mitigation improvements were identified and their location recorded for all alternatives.

### **Alternatives A, B, and C – Twin Cities Site**

A key feature of the traffic mitigation for Alternatives A, B, and C on the Twin Cities site is the construction of a full interchange on Hwy 99 at Mingo Road. As described in **Section 5.8**, the improved interchange would involve a four-lane bridge over Hwy 99 that would allow access to Hwy 99 Northbound (NB) and Southbound (SB) from both sides of the freeway. For Alternative C, traffic mitigation for the cumulative year (2035) also includes widening Twin Cities Road to four lanes between Fermoy Way and Marengo Road. The environmental consequences of implementing the traffic mitigation measures described above are discussed below.

Impacts of additional mitigation for the cumulative scenario is not discussed further as the projects would not cause significant effects. This includes the following recommended improvements at the Grant Line Road and East Stockton Boulevard intersection:

- Restripe SB approach to one left-turn lane, one shared through/right, and one right-turn lane.
- Convert NB/SB signal phasing from split to protected left-turn phasing.
- Implement traffic signal coordination to improve progression along Grant Line Road with adjacent signalized intersections during weekday P.M. peak period.

### ***Geology and Soils***

The construction of roadway improvements may require grading and the introduction of fill material. The increase in impervious surfaces and additional cut-and-fill embankments could result in erosion of soils. Stable fill material, engineered embankments, and erosion control features would be used to reduce the potential for slope instability, subsidence and erosion in accordance with the jurisdictional agency (California Department of Transportation (Caltrans), Sacramento County, and/or City) requirements for roadway construction. Watering during grading activities would mitigate the effect of wind erosion to the underlying soils. In addition, in accordance with the federal Clean Water Act (CWA), any construction of roadway improvements over one acre in area would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permit program. To comply with the NPDES program, a Stormwater Pollution Prevention Plan (SWPPP) would be developed that would include soil erosion and sediment control practices to reduce the amount of exposed soil, prevent runoff from flowing across disturbed areas, slow runoff from the site, and remove sediment from the runoff.

With standard construction practices and specifications required by the jurisdictional agency and the NPDES General Construction Permit Program as well as Best Management Practices (BMPs) and mitigation included in **Section 5.2**, there would be no adverse effects to geology and soils as a result of off-site traffic mitigation under Alternatives A, B, and C.

### ***Water Resources***

The development of roadway improvements for traffic mitigation could affect water resources due to grading and construction activities that would increase impervious surfaces. Potential effects include an increase in surface runoff and increased erosion, which could cause localized flooding and adversely affect surface water quality due to increases in sediment and roadway pollutants such as grease and oil.

As discussed above, construction of roadway improvements that exceed one acre of land would be required to comply with the NPDES General Construction Permit Program, including through the development of a SWPPP that would include soil erosion and sediment control practices to reduce the amount of exposed soil, prevent runoff from flowing across disturbed areas, slow runoff from the site, and remove sediment from the runoff.

Curb and gutters, inlets, and other drainage facilities would be constructed to meet the standards of the jurisdictional agency and provide adequate facilities to direct stormwater runoff. With incorporation of these drainage features and compliance with the soil erosion and sediment control practices identified in the SWPPP and erosion control mitigation included in **Section 5.2** and **Section 5.3**, effects to water resources would be less than significant. Therefore, there would be no significant indirect effects to water resources as a result of off-site traffic mitigation under Alternative A, B, or C.

### ***Air Quality***

Development of roadway improvements would result in short-term, construction-related air pollutant emissions. The construction phase would produce two types of air contaminants: exhaust emissions from construction equipment and fugitive dust generated as a result of demolition and soil movement. Due to the small size of roadway improvements compared to the project alternatives, construction-related emissions would be less than those associated with the construction of the project. With incorporation of BMPs and mitigation measures to reduce fugitive dust and construction equipment emissions (refer to **Section 5.4**) including watering of the site to reduce wind erosion, air quality impacts will be less than significant.

Operational effects would occur if the roadway improvements resulted in localized increases in carbon monoxide (CO) concentrations or if the roadway improvements contributed to traffic congestion at large intersections. However, it is expected that the roadway improvements would reduce congestion and improve traffic flow. With the improved circulation resulting from traffic mitigation, level of service (LOS) would be improved, thereby reducing idling time and associated vehicle emissions. The operational effects of the traffic improvements would therefore be less than significant.

### ***Greenhouse Gases (GHGs)***

Construction of off-site traffic mitigation would be much less extensive than that of the project alternatives; correspondingly, GHG emissions would be reduced. Alternative A's construction would

result in the emission of 2,376.3 metric tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>e) per year, and adding emissions of the construction of traffic mitigation would not result in emissions equal to or above the CEQ reference point of 25,000 MT of CO<sub>2</sub>e per year. Impacts from Alternatives B and C would be less than those from Alternative A. Therefore, with the use of mitigation described under **Section 5.4**, there would be a less than significant effect resulting from GHG emissions related to the construction of off-site traffic mitigation.

Due to decreased congestion and idling as a result of the traffic improvements, there will be a reduction in the emission of GHGs. Therefore, no significant adverse impact would occur.

### ***Biological Resources***

The construction of the Mingo Road/Hwy 99 interchange improvements would not significantly affect any listed species. The area is largely ruderal developed with the exception of several large trees, most of which are primarily non-native eucalyptus (blue gum) on both sides of Hwy 99. Caltrans procedures would be followed for the trees within their right-of-way. There are manmade roadside ditches along Mingo Road and Twin Cities Road west of Hwy 99 that may be impacted by road widening but are likely not jurisdictional. If they are later determined to be jurisdictional, a Section 404 permit will be obtained and mitigation consistent with the U.S. Army Corps of Engineers (USACE) and U.S. Environmental Protection Agency (USEPA) guidelines will be implemented, as described in **Section 5.5.2**.

Improvements to roadway systems as identified in **Section 5.8** will extend the footprint of the existing roads, and will require the relocation of some roadside ditches. Since these drainages are man-made, provide little or no habitat, and are unlikely to be jurisdictional, no significant impacts to waters of the U.S., federal- or state-listed species, or nesting birds are anticipated. However, the mitigation measures that are identified in **Section 5.5** would also be applicable to off-site traffic improvements and would be implemented if necessary. Formal delineation of the manmade roadside ditches would occur as part of the approval process for transportation improvements, once the improvements are agreed upon and designed. Implementation of avoidance and mitigation measures included in **Section 5.5** would ensure that indirect effects to biological resources would not occur as a result of off-site traffic mitigation under Alternatives A, B, and C. Specific issues related to recommended off-site road improvements are discussed below.

#### ***Twin Cities Road***

The north side of Twin Cities Road has a linear ditch extending nearly the whole length of the proposed road improvement area. This ditch does not appear to be jurisdictional, as it does not have an ordinary high water mark (OHWM), bed and bank, or contain any hydrophytic vegetation. The south side of the road is extensively developed and contains no biological features.

### *Mingo Road/Hwy 99 Interchange Improvements*

There is a man-made ditch feature on the northeast intersection of Mingo Road and East Stockton Blvd. It does not appear to be a jurisdictional feature, as it does not contain an OHWM, bed and bank, or any hydrophytic vegetation. There are culverts under the driveway connections on East Stockton Blvd. to allow the flow of water through the ditch.

### **Cultural Resources**

As described in the Cultural Resources Study included as **Appendix O** and summarized in **Section 3.6**, three previously recorded historic properties are known to occur on the Twin Cities site; however, none are located near the interchange improvements west of Hwy 99 and thus would not be affected. However, improvements to the Hwy 99 interchange on the east side of Hwy 99 and widening of Twin Cities Road may affect cultural resources.

If the proposed traffic mitigation improvements are implemented, then there may be resultant impacts to the built environment. Historic ranch buildings, including a 1957 barn and other outbuildings, lie in the path of the proposed on/off-ramps from Hwy 99 to Mingo Road. Additionally, a number of residences that appear to be more than 50 years old sit along Twin Cities Road and could be affected by widening that corridor. Impacts to these buildings are potentially significant, and mitigation measures are presented in **Section 5.6** for the evaluation of these structures. Implementation of the measures listed in **Section 5.6** would ensure that effects on buildings greater than 50 years old would be reduced to a less-than-significant level as a result of off-site traffic improvements under Alternative A, B, or C.

There is a possibility that previously unknown cultural resources will be encountered during ground disturbing activities. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated archaeological discoveries. Implementation of avoidance and mitigation measures listed in **Section 5.6** would ensure that effects to cultural resources would not occur and thus not be significant as a result of off-site traffic improvements under Alternative A, B, or C.

### *Paleontological Resources*

As summarized in **Section 3.6**, the available literature reports few paleontological resources in the vicinity of the project sites; however, fossils have been identified within similar environments within California. Therefore, there is the potential for unreported subsurface paleontological resources to be present on the alternative sites. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries. Implementation of avoidance and mitigation measures listed in **Section 5.6** would ensure that significant indirect effects to paleontological resources would not occur as a result of off-site traffic improvements under any alternative.

***Socioeconomic Conditions***

Off-site traffic improvements would result in short-term disturbances to traffic flow and minor delays due to constricted traffic movement. Nearby businesses and residences would remain accessible throughout construction. The area of roadway impacts would be of a limited size and would not create negative socioeconomic effects. The intersection improvements would not result in long-term disruption of access to surrounding land uses or to minority or low-income populations. The fair share costs of these roadway improvements would be borne by the Tribe. Therefore, there would be no significant indirect effects to socioeconomic conditions as a result of off-site traffic mitigation under Alternatives A, B, and C.

***Transportation/Circulation***

Off-site traffic mitigation would result in beneficial effects to traffic circulation. Off-site traffic improvements would be limited in scale and duration, resulting only in short-term disturbances to traffic flow. If construction activities require temporary lane closures to accommodate construction equipment, a traffic management plan would be prepared in accordance with the jurisdictional agency requirements, thus avoiding potentially adverse temporary effects.

***Land Use***

Off-site traffic mitigation would be generally consistent with the City of Galt and Sacramento County general plans and the Caltrans Hwy 99 improvement plans. Right-of-way acquisition for the Mingo Road interchange and other traffic improvements may be required. Adjacent property owners would be compensated at fair market values for land needed for right-of-way. The traffic improvements would not result in changes in land use inconsistent with the General Plans or other guiding documents. There would be no significant indirect effects to land use as a result of off-site traffic mitigation under Alternatives A, B, and C.

***Public Services***

Traffic improvements may require relocation of utilities near existing roadways. These utilities include overhead electricity lines and telecommunication lines. Relocation of these lines could result in a temporary break in service to some homes and businesses in the area. However, because these effects are common when upgrading and maintaining utility services, and because potential service breaks would be temporary, these effects are considered less than significant. Furthermore, each improvement would be completed to the standards of the agencies with jurisdiction over the intersection/roadway (Caltrans, City of Galt, City of Elk Grove, and Sacramento County). No effects to police, fire, or emergency medical services are expected, as access to homes and businesses would be maintained during the construction period. Therefore, there would be no indirect effects to public services as a result of off-site traffic mitigation under Alternatives A, B, and C.

**Noise**

Construction of intersection improvements would result in minimal noise impacts. Any impacts that may occur would be reduced through Caltrans, Sacramento County, and/or local regulations, including the imposition of construction hours and the use of noise abatement equipment. Most proposed transportation improvement locations are not located on residential streets or near other sensitive land uses, and therefore noise would not affect sensitive receptors. Accordingly, by implementing the mitigation included in **Section 5.11**, no significant indirect noise impacts would occur as a result of off-site traffic mitigation under Alternatives A, B, and C.

**Hazardous Materials**

The accidental release of hazardous materials used during grading and construction activities could pose a hazard to construction employees, surrounding residents, and the environment. However, these hazards, which are common to construction activities, would be minimized with adherence to State and federal statutes and standard operating procedures, such as refueling in designated areas, storing hazardous materials in approved containers, clearing of dried vegetation, and proper initiation of response and clean-up measures. By following mitigation measures included in **Section 5.12**, potential indirect hazardous materials impacts from the construction of off-site roadway improvements would be less than significant for Alternatives A, B, and C.

**Aesthetics**

With the modification and expansion of existing roadways, visual effects would occur. However, road improvements would be made in areas that are already developed with roadway networks. Modified intersections, interchanges, and roadways would conform to modern design standards. Improvements would not result in significant removal or alteration of vegetation, topographic features, or key visual characteristics. Additionally, traffic improvements would not change surrounding land uses and would occur in areas with existing roadway networks. Therefore, no significant indirect effects to aesthetics or community character are expected to occur as a result of off-site traffic mitigation under Alternatives A.

**Alternatives D and E – Historic Rancheria Site**

Traffic mitigation for Alternatives D and E is included in **Section 5.8**. Traffic improvements include realignment of Green Road and Cosumnes Road to form a single-point intersection and widening several different roads.

Additional traffic mitigation not discussed further as the projects are unlikely to cause impacts include:

- Signalize the Wilton Road and Green Road intersection.
- Restripe the SB approach lane at the Grant Line Road and East Stockton Boulevard intersection.
- Implement traffic signal coordination to improve progression along Grant Line Road with adjacent signalized intersections during weekday P.M. peak period.

In the cumulative scenario, additional mitigation unlikely to cause impacts includes:

- Implement traffic signal coordination to improve progression at the intersection of Grant Line Road and East Stockton Boulevard
- Optimize signal timings at the intersection of Kammerer Road and Promenade Parkway.

The environmental consequences of implementing the traffic mitigation described above are discussed below.

### ***Geology and Soils***

The impacts to geology and soils would be similar to those described under Alternative A. With mitigation specified in **Section 5.2**, impacts would be less than significant.

### ***Water Resources***

Impacts to water resources would be similar to those described under Alternative A. With mitigation specified in **Section 5.2** and **Section 5.3**, impacts would be less than significant.

### ***Air Quality***

Development of roadway improvements would result in similar short-term, construction-related air pollutant emissions as those described under Alternative A, and the air quality effects would be similarly insignificant. As described under Alternative A, with improved circulation resulting from traffic mitigation, LOS would be improved, thereby reducing idling time and associated vehicle emissions. The long-term effects of off-site traffic improvement would therefore be less than significant with incorporation of the BMPs and mitigation included in **Section 5.4**.

### ***Biological Resources***

Most roadway improvements for the Historic Rancheria site would take place within previously disturbed areas; however, several potentially sensitive biological resources occur along Dillard Road and Grant Line Road within the off-site traffic mitigation areas. Mitigation is specified in Section 5.5 to address these potential impacts. No other impacts to federal and state listed species and nesting birds are anticipated. However, in the event of a potential impact on biological resources as a result of off-site traffic improvements, measures to avoid impacts to waters of the U.S., potentially occurring federal and state listed species, and nesting birds that are identified in **Section 5.5** for the Historic Rancheria site should be implemented. Implementation of avoidance and mitigation measures included in **Section 5.5** would ensure that indirect effects to biological resources would not occur as a result of off-site traffic mitigation under Alternatives D and E. Specific issues related to recommended off-site road improvements are discussed below.

### *Dillard Road*

There is a potential water of the US near the intersection of Dillard Road and Hwy 99, running south to north. There are also a number of potential waters of the US on the north side of Dillard Road running through the agricultural fields and intersecting the road. These features had some evidence of OHWM. There was a potential wetland on the north side of Dillard Road near the intersection with Cosumnes Road. Roadside ditches were common on this road on both sides, but evidence of OHWM, bed and bank, and hydrophytic vegetation were absent.

### *Grant Line Road*

There is a potentially jurisdictional stock pond near the intersection of Grant Line Road and Mooney Road on the east side of the street. Additionally, there is a potentially jurisdictional wetland south of the intersection of Sloughhouse Road on the east side of Grant Line Road with apparent hydrophytic vegetation. Additionally, there are several potentially jurisdictional waters of the US located on the west side of Grant Line Road north of the intersection of Sunrise Blvd. Roadside drainage ditches are extremely common along the whole length of Grant Line Road, but these features do not exhibit OHWM, bed and bank, or hydrophytic vegetation typical of waters of the US and as such are likely not jurisdictional.

### *Wilton Road*

Roadside ditches were common on the Wilton Road segment. None of these features had evidence of OHWM, bed and bank, or hydrophytic vegetation. These features are not likely to be jurisdictional.

### *Green Road*

The Green Road segment of the off-site traffic mitigation was entirely developed. No biological features were present.

## **Cultural Resources**

No cultural resources were identified within the Historic Rancheria construction area. However, if the proposed traffic mitigation improvements are implemented, then there may be resultant impacts to the built environment. Historic ranch buildings, railroad tracks, and residences that may be more than 50 years old sit along – or across – Grant Line Road and Dillard Road. Impacts to these buildings and structures are potentially significant, and mitigation measures are presented in **Section 5.6** for the evaluation and protection if necessary of buildings and structures. Implementation of the measures listed in **Section 5.6** would ensure that effects on buildings or structures greater than 50 years old would be reduced to a less-than-significant level as a result of off-site traffic improvements under Alternative D or E.

There is a possibility that previously unknown cultural resources will be encountered during ground disturbing activities. This would be a potentially significant impact. Mitigation measures are presented

in **Section 5.6** for the treatment of unanticipated archaeological discoveries. Implementation of avoidance and mitigation measures listed in **Section 5.6** would ensure that effects to cultural resources would not occur and thus not be significant as a result of off-site traffic improvements under Alternative D or E.

#### *Paleontological Resources*

As summarized in **Section 3.6**, the available literature reports few paleontological resources in the vicinity of the project sites; however, fossils have been identified within similar environments within California. Therefore, there is the potential for unreported subsurface paleontological resources to be present on the alternative sites. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries. Implementation of avoidance and mitigation measures listed in **Section 5.6** would ensure that significant indirect effects to paleontological resources would not occur as a result of off-site traffic improvements under any alternative.

#### **Socioeconomic Conditions**

Socioeconomic conditions would be similar to those described under Alternative A. Impacts would be less than significant.

#### **Transportation/Circulation**

Off-site traffic mitigation would result in beneficial effects to traffic circulation. Off-site traffic improvements would be limited in scale and duration, resulting only in short-term disturbances to traffic flows. If construction activities require temporary lane closures to accommodate construction equipment, a traffic management plan would be prepared in accordance with the jurisdictional agency requirements, thus avoiding potentially adverse temporary effects.

#### **Land Use**

Construction of off-site traffic mitigation would not result in adverse land use effects. The intersection and roadway improvements would be in accordance with the Sacramento County general plan. The traffic improvements would not result in changes in land use inconsistent with the General Plans or other guiding documents. It is anticipated that traffic improvements can be constructed within existing and available right-of-ways. Therefore, there would be no significant indirect effects to land use as a result of off-site traffic mitigation under Alternatives D and E.

#### **Public Services**

Effects to utilities, police, fire, and emergency medical services are similar to those described under Alternative A. With mitigation specified in **Section 5.10**, impacts would be less than significant.

**Noise**

Construction of road improvements would be in the vicinity of existing roadways and would result in minimal noise impacts. Any impacts that may occur would be reduced through Caltrans, Sacramento County, and/or local regulations, including the imposition of construction hours and the use of noise abatement equipment, included as mitigation under **Section 5.11**. Accordingly, with the incorporation of the same noise mitigation used for direct project-related noise impacts, no significant indirect noise impacts would occur as a result of off-site traffic mitigation under Alternatives D and E.

**Hazardous Materials**

Hazardous materials effects are similar to those described under Alternative A. With the mitigation specified in **Section 5.12**, impacts would be less than significant.

**Aesthetics**

Aesthetic impacts as a result of Alternatives D and E would be similar to those under Alternative A. With the mitigation specified in **Section 5.13**, impacts would be less than significant.

**Alternative F: Casino Resort on the Mall Site**

Traffic mitigation for Alternative F is identified in **Section 5.8**. Traffic improvements include widening the WB approach to the Promenade Parkway and Bilby Road intersection to provide three left-turn lanes, one through lane and one right-turn lane, widening Grant Line Road between Waterman Road and Bradshaw Road in the near term, and several other road widening projects by the year 2035.

Additional mitigation not discussed further as the projects are unlikely to cause impacts include:

- Provide NB right-turn overlap signal phase during Westbound (WB) left-turn phase at the intersection of Promenade Parkway and Bilby Road.

In the cumulative scenario, additional mitigation unlikely to cause impacts includes:

- Optimize signal timing at the intersection of Kammerer Road and Promenade Parkway.
- Restripe the SB approach lane and implement traffic signal coordination at the intersection of Grant Line Road and East Stockton Boulevard.

The environmental consequences of implementing the traffic mitigation measures described above are discussed below.

### ***Geology and Soils***

Impacts to geology and soils are similar to those described under Alternative A. With the mitigation specified in **Section 5.2**, impacts would be less than significant.

### ***Water Resources***

Impacts to water resources would be similar to those described under Alternative A. With the mitigation specified in **Section 5.2** and **Section 5.3**, impacts would be less than significant.

### ***Air Quality***

Impacts to air quality would be similar to those described under Alternative A. With the mitigation specified in **Section 5.4**, impacts would be less than significant.

### ***Biological Resources***

Roadway improvements for the Mall site would largely take place within previously disturbed areas or areas lacking sensitive habitats; however, there are several potentially jurisdictional wetlands and waters of the US located on Grant Line Road. No impacts to federal and state listed species or nesting birds are anticipated. However, in the event of a potential impact to biological resources as a result of off-site traffic improvements, measures to avoid impacts to waters of the U.S., potentially occurring federal and state listed species, and nesting birds that are specified in **Section 5.5** for the Mall site should be implemented. Implementation of avoidance and mitigation measures identified in **Section 5.5** would ensure that indirect effects to biological resources would not occur as a result of off-site traffic mitigation under Alternative F.

#### *Grant Line Road*

See discussion of Grant Line Road biological resources in the section for Alternative D and C.

#### *Kammerer Road*

Roadside ditches were common on the Kammerer Road segment. None of these features had evidence of OHWM, bed and bank, or hydrophytic vegetation. These features are not likely to be jurisdictional

### ***Cultural Resources***

No cultural resources were identified within the Mall site. However, if the proposed traffic mitigation improvements are implemented, then there may be resultant impacts to the built environment. Historic ranch buildings, a brick utility building, and some older residences are located along Kammerer and Grant Line roads. Impacts to these buildings are potentially significant, and mitigation measures are presented in **Section 5.6** for the evaluation and protection if necessary of buildings greater than 50 years old. Implementation of the measures listed in **Section 5.6** would ensure that effects on buildings greater than 50 years old would be reduced to a less-than-significant level as a result of off-site traffic improvements under Alternative F.

There is a possibility that previously unknown cultural resources will be encountered during ground disturbing activities. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated archaeological discoveries. Implementation of avoidance and mitigation measures listed in **Section 5.6** would ensure that effects to cultural resources would not occur and thus not be significant as a result of off-site traffic improvements under Alternative F.

#### ***Paleontological Resources***

As summarized in **Section 3.6**, the available literature reports few paleontological resources in the vicinity of the project sites; however, fossils have been identified within similar environments within California. Therefore, there is the potential for unreported subsurface paleontological resources to be present on the alternative sites. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries. Implementation of avoidance and mitigation measures listed in **Section 5.6** would ensure that significant indirect effects to paleontological resources would not occur as a result of off-site traffic improvements under any alternative.

#### ***Socioeconomic Conditions***

Socioeconomic conditions would be similar to those described under Alternative A. Impacts would be less than significant.

#### ***Transportation/Circulation***

Off-site traffic mitigation would result in beneficial effects to traffic circulation. Off-site traffic improvements would be limited in scale and duration, resulting only in short-term disturbances to traffic flows. If construction activities require temporary lane closures to accommodate construction equipment, a traffic management plan would be prepared in accordance with the jurisdictional agency requirements, thus avoiding potentially adverse temporary effects.

#### ***Land Use***

Construction of off-site traffic mitigation would not result in adverse land use effects. The intersection and roadway improvements would be in accordance with the City of Elk Grove general plan. The traffic improvements would not result in changes in land use inconsistent with the General Plans or other guiding documents. Therefore, there would be no significant indirect effects to land use as a result of off-site traffic mitigation under Alternatives F.

#### ***Public Services***

Effects to utilities, police, fire, and emergency medical services are similar to those described under Alternative A. With mitigation specified in **Section 5.10**, impacts would be less than significant.

**Noise**

Construction of intersection improvements would result in minimal noise impacts. Any impacts that may occur would be reduced through City of Elk Grove regulations, including the imposition of construction hours and the use of noise abatement equipment. Proposed transportation improvement locations are not located on residential streets or near sensitive land uses, and therefore noise would not affect sensitive receptors. Accordingly, with implementation of mitigation included in **Section 5.11**, no significant indirect noise impacts would occur as a result of off-site traffic mitigation under Alternatives F.

**Hazardous Materials**

Hazardous materials effects are similar to those described under Alternative A. With the mitigation specified in **Section 5.12**, impacts would be less than significant.

**Aesthetics**

Aesthetic impacts as a result of Alternative F would be similar to those under Alternative A. With the mitigation specified in **Section 5.13**, impacts would be less than significant.

**Alternative G: No Action**

Under the no action alternative, none of the development alternatives would be implemented, and therefore no off-site traffic improvements would take place. No effect would occur under this alternative.

**4.14.2 INDIRECT EFFECTS FROM UTILITY/INFRASTRUCTURE IMPROVEMENTS**

As shown in **Figure 2-3**, Alternatives A, B, and C on the Twin Cities site may require off-site utility improvements, including a natural gas connection, Water Supply Option 2 (off-site supply) and/or Wastewater Option 2 (off-site treatment and disposal). These optional utility projects involve tying the Twin Cities site into the Galt municipal water and wastewater systems with new pipeline connections and the PG&E natural gas distribution system.

**Environmental Consequences****Geology and Soils**

The construction of pipeline connections would require grading, excavation, trenching, laying of pipe, and the placement of backfill material to construct the connection to existing water and wastewater utilities. Potential impacts include soil erosion. With standard construction practices and specifications required by the City of Galt as well as mitigation measures provided in **Section 5.2**, there would be no significant indirect effects to geology and soils as a result of off-site water/wastewater improvements under Alternative A, B, or C.

***Water Resources******Construction***

The development of utility improvements could affect water resources due to grading and construction activities. Potential effects include increased erosion, which could adversely affect surface water quality due to increases in sediment and roadway pollutants such as grease and oil. Construction of utility improvements that exceed 1 acre of ground disturbance would be required to comply with the NPDES General Construction Permit Program. To comply with the program, a SWPPP would be developed that would include soil erosion and sediment control practices to reduce the amount of exposed soil, prevent runoff from flowing across disturbed areas, slow runoff from the site, and remove sediment from the runoff. Construction on City property (including land within the boundaries of the City wastewater treatment plant (WWTP) and within City streets) would also be required to comply with the City standards for construction. Effects to runoff volumes resulting from the increase in impervious surfaces would be minimal due to the limited extent of above ground improvements. With compliance with the soil erosion and sediment control practices identified in the SWPPP, effects to water resources would be less than significant. Mitigation measures are presented in **Section 5.2** that would further reduce the potential for stormwater runoff to impact water quality.

***Operation***

Wastewater would be treated and disposed through connection to the City's sewer system under Wastewater Option 2. The City's WWTP discharges treated water to Laguna Creek or uses it for irrigation, which could affect groundwater or surface water quality. However, wastewater effluent from the WWTP is discharged pursuant to an NPDES permit issued by the Regional Water Quality Control Board, which contains stringent requirements for discharge quality, volume, and monitoring. The effects of the freshwater pipeline connection to the Galt municipal supply have been analyzed in **Section 4.3**. By following mitigation measures, including erosion control practices, included in **Section 5.3**, there would be no significant indirect effects to water quality as a result of off-site utility improvements under Alternative A, B, or C.

***Air Quality***

Construction of water/wastewater pipelines would be of a limited duration and not constitute a magnitude of earthwork that would create significant air quality effects. Construction generated dust and emissions would be controlled by standard BMPs. Construction emissions would be negligible given the small area of disturbance and temporary nature of construction activities; by following mitigation measures included in **Section 5.4**, emissions would not exceed applicable emission levels (40 CFR 153 (b)(1) and (2)),

***Biological Resources***

No sensitive biological communities or habitat for special status species were identified within the proposed improvement areas, except for small drainages that may need to be crossed. If City Sewer Connection Option 2 is chosen, horizontal directional drilling or jack and bore techniques, along with

other mitigation measures recommended for direct effects to the Twin Cities site in **Section 5.5**, would be used to avoid impacts to drainages. Therefore, there would be no significant indirect effects to biological resources as a result of water/wastewater improvements under Alternatives A, B, or C.

### ***Cultural Resources***

No prehistoric or historic period cultural resources are known to occur within the vicinity of the utility infrastructure improvements based upon a record search, conducted at the North Central Information Center (NCIC), and field survey (refer to **Section 3.6**). Therefore, no significant impacts to known cultural resources would occur as a result of off-site water/wastewater improvements. By following the mitigation measures included in **Section 5.6** in the event of accidental discovery, effects to cultural resources would be less than significant.

### ***Paleontological Resources***

As summarized in **Section 3.6**, the available literature reports few paleontological resources in the vicinity of the project sites; however, fossils have been identified within similar environments within California. Therefore, there is the potential for unreported subsurface paleontological resources to be present on the alternative sites. This would be a potentially significant impact. Mitigation measures are presented in **Section 5.6** for the treatment of unanticipated paleontological discoveries. Implementation of avoidance and mitigation measures listed in **Section 5.6** would ensure that significant indirect effects to paleontological resources would not occur as a result of off-site traffic improvements under any alternative.

### ***Socioeconomic Conditions***

The costs of water/wastewater improvements would be borne by the Tribe. Therefore, there would be no indirect effects to socioeconomic conditions as a result of water/wastewater improvements under Alternatives A, B, or C.

### ***Transportation/Circulation***

Improvements within road right-of-ways would be limited in scale and duration, resulting only in short-term disturbances to traffic flows. Under both city sewer connection options, the pipeline would cross the railroad tracks running north-south adjacent to the western border of the Twin Cities site, and under Water Supply Option 2 (off-site), the water line would need to cross Hwy 99. Consultation with the appropriate agencies, including the railroad and Caltrans, along with the temporary nature of construction, would ensure there would be no indirect effects to the transportation and circulation network as a result of water/wastewater improvements under Alternatives A, B, or C.

### ***Land Use***

The construction of proposed utility improvements would not result in adverse land use effects as connections would be located underground and all surfaces would be restored to existing conditions after

construction is completed. There would be no indirect effects to land use as a result of off-site utility improvements under Alternative A, B, or C.

### ***Public Services***

Construction of utility improvements would avoid existing utilities. Overhead electricity lines and telecommunication lines would not be affected. No effects to police, fire, or emergency medical services are expected as access to homes and businesses would be maintained during the construction period. Therefore, there would be no significant indirect effects to public services as a result of utility improvements under Alternatives A, B, and C.

### ***Noise***

Construction of off-site utility improvements would result in minor noise impacts as a result of Alternatives A, B, and C. City regulation of construction hours and requirements for installation of noise abatement equipment would minimize such impacts. Therefore, with incorporation of the mitigation included in **Section 5.11**, no significant indirect noise impacts would occur as a result of off-site utility improvements under Alternatives A, B, and C.

### ***Hazardous Materials***

Construction of the proposed water/wastewater infrastructure improvements could potentially result in hazardous materials effects. The accidental release of hazardous materials used during excavation and construction activities could pose a hazard to construction employees, surrounding residents, and the environment. Additionally, equipment used during excavation and construction activities could ignite dry grass and weeds in construction areas. However, these hazards, which are common to construction activities, would be minimized with adherence to City, state and federal statutes, standard operating procedures, and BMPs, such as refueling in designated areas, storing hazardous materials in approved containers, clearing of dried vegetation, and properly initiating of response and clean-up measures as well as the mitigation provided in **Section 5.12**. Potential indirect hazardous materials impacts from the construction of water/wastewater infrastructure improvements are therefore less than significant.

### ***Aesthetics***

Because the proposed pipelines would be constructed within a trench that would be backfilled after construction, impacts to aesthetics and community character would be temporary and insignificant. Therefore, significant indirect effects to aesthetics would not occur as a result of Alternatives A, B, and C.

## **4.14.3 GROWTH-INDUCING EFFECTS**

NEPA requires that an Environmental Impact Study (EIS) analyze “growth inducing effects” (40 CFR §1502.16 (b), 40 CFR §1508.8 (b)). A growth inducing effect is defined as one that fosters economic or population growth, or the construction of additional housing. Growth inducement could result if a project

established substantial new permanent employment opportunities (e.g., new commercial, industrial, or governmental enterprises) or if it would remove obstacles to population growth (e.g., expansion of a WWTP that could allow more construction in the service area). Direct growth inducement is possible if a project contains a component that by definition would lead to “growth,” such as new residential development. None of the project alternatives includes direct growth inducement. This section assesses the potential for indirect growth inducement for each development alternative.

### **Alternative A – Twin Cities Casino Resort**

Development of Alternative A would result in one-time employment opportunities from construction and permanent employment opportunities from operation. These opportunities would result from direct as well as indirect and induced effects. Construction opportunities would be temporary in nature, and would not result in the permanent relocation of employees to the City of Galt or Sacramento County.

**Section 4.7.1** determined Alternative A would result in an annual total of approximately 2,879 employment opportunities, including direct, indirect, and induced opportunities. Other alternatives would have a roughly equal or smaller effect on employment. Of these new jobs, a majority of positions would be filled with people already residing within the region (**Appendix H**) and would, therefore, not require new housing. As discussed in **Section 3.7.2**, there were approximately 42,000 vacant housing units in the local housing market of Sacramento County in 2010. While national and regional trends in real estate indicate absorption of some excess housing stock, based on regional housing stock projections and current trends in local housing market data, there are anticipated to be more than enough available housing units to support new employees under Alternative A. As such, Alternative A is not expected to significantly stimulate regional housing development. A significant adverse growth inducing impact to the housing market would not occur with Alternative A.

The potential for commercial growth resulting from the development of Alternative A would result from fiscal output generated throughout Sacramento County. Under Alternative A, this output would be generated from direct, indirect, and induced economic activity. Construction and operation activities would result in direct output to the industries discussed in **Section 4.7.1**. Businesses in these sectors would generate growth in the form of indirect output resulting from expenditures on goods and services at other area businesses. In addition, employees from Alternative A would generate growth from induced output resulting from expenditures on goods and services at other area businesses. Indirect and induced output could stimulate further commercial growth; however, such demand would be diffused and distributed among a variety of different sectors and businesses in the City of Galt and Sacramento County. As such, significant regional commercial growth inducing impacts would not be anticipated to occur with Alternative A.

Development in the City of Galt or other cities within Sacramento County would be subject to the constraints of their general plans, local ordinances, and other planning policies and documents. New

projects resulting from any induced effect would be subject to appropriate project-level environmental analysis. As discussed above, the minimal amount of commercial growth that may be induced by Alternative A would not result in significant adverse environmental growth inducing effects.

### **Alternative B – Reduced Intensity Twin Cities Casino**

Development of Alternative B would generate new employment opportunities that could result in additional housing and commercial demand. **Section 4.7.2** determined that the employment impact would result in an annual total of approximately 2,380 employment opportunities, including direct, indirect, and induced opportunities. Similar to Alternative A, a majority of positions are anticipated to be filled with people already residing within the region and would, therefore, not require new housing. The effect on housing and potential commercial growth would be comparable but to a lesser degree than Alternative A, since Alternative B is reduced in size and scope. Similar to Alternative A, based on regional housing stock projections and current trends in local housing market data, there are anticipated to be more than enough available homes to support new employees under Alternative B. As such, Alternative B is not expected to stimulate regional housing development, and significant regional commercial growth would not be anticipated to occur.

Development in the City of Galt or other cities within Sacramento County would be subject to the constraints of their general plans, local ordinances, and other planning policies and documents. New projects resulting from any induced effect would be subject to appropriate project-level environmental analysis. As discussed above, the minimal amount of commercial growth that may be induced by Alternative B would not result in significant adverse environmental effects.

### **Alternative C – Retail on Twin Cities Site**

Development of Alternative C would generate new employment opportunities that could result in additional housing and commercial demand. **Section 4.7.3** determined that the employment impact of Alternative C would result in an annual total of between approximately 707 and 844 employment opportunities, including direct, indirect, and induced opportunities. Similar to Alternative A, a majority of positions are anticipated to be filled with people already residing within the region and would, therefore, not require new housing. The effect on housing and potential commercial growth would be less than Alternative A. Similar to Alternative A, based on regional housing stock projections, and current trends in local housing market data, there are anticipated to be more than enough available homes to support new employees under Alternative C. As such, Alternative C is not expected to stimulate regional housing development and a significant adverse induced impact to the housing market would not occur.

Development in the City of Galt or other cities within Sacramento County would be subject to the constraints of their general plans, local ordinances, and other planning policies and documents. New projects resulting from any induced effect would be subject to appropriate project-level environmental

analysis. As discussed above, the minimal impact to Sacramento County as a result of potential growth inducement from Alternative C would be less than significant.

### **Alternative D – Casino-Resort at Historic Rancheria Site**

Development of Alternative D on the Historic Rancheria site would generate new employment opportunities that could result in additional housing and commercial demand. **Section 4.7.4** determined that the employment impact of Alternative D would result in an annual total of approximately 2,639 employment opportunities, including direct, indirect, and induced opportunities. Similar to Alternative A, a majority of positions are anticipated to be filled with people already residing within the region and would, therefore, not require new housing. The effect on housing and potential commercial growth would be similar to Alternative A due to the similar size and scope of development. Similar to Alternative A, based on regional housing stock projections and current trends in local housing market data, there are anticipated to be more than enough available homes to support new employees under Alternative D. As such, Alternative D is not expected to stimulate regional housing development and a significant adverse induced impact to the housing market would not occur.

Development within Sacramento County would be subject to the constraints of their general plans, local ordinances, and other planning policies and documents. New projects resulting from any induced effect would be subject to appropriate project-level environmental analysis. As discussed above, the minimal impact to Sacramento County as a result of potential growth inducement from Alternative D would be less than significant.

### **Alternative E – Reduced Intensity Casino at Historic Rancheria Site**

Development of Alternative E would generate new employment opportunities that could result in additional housing and commercial demand. **Section 4.7.5** determined that the employment impact would result in an annual total of approximately 2,095 employment opportunities, including direct, indirect, and induced opportunities. Similar to Alternative B, a majority of positions are anticipated to be filled with people already residing within the region and would, therefore, not require new housing. The effect on housing and potential commercial growth would be comparable to Alternative B. Similar to Alternatives A and B, based on regional housing stock projections and current trends in local housing market data, there are anticipated to be more than enough available homes to support new employees under Alternative E. As such, Alternative E is not expected to stimulate regional housing development and significant regional commercial growth would not be anticipated to occur.

### **Alternative F – Casino Resort at Mall Site**

Development of Alternative F would result in one-time employment opportunities from construction and permanent employment opportunities from operation. These opportunities would result from direct as well as indirect and induced effects. Construction opportunities would be temporary in nature, and would

not be anticipated to result in the permanent relocation of employees into the City of Elk Grove and/or Sacramento County.

**Section 4.7.6** determined that the employment impact would result in an annual total of approximately 2,914 employment opportunities, including direct, indirect, and induced opportunities. Similar to Alternative A, a majority of positions are anticipated to be filled with people already residing within the region and would, therefore, not require new housing. The effect on housing would be comparable to Alternative A.

The potential for commercial growth resulting from the development of Alternative F would result from fiscal output generated throughout the City of Elk Grove and Sacramento County. Under Alternative F, this output would be generated from direct, indirect, and induced economic activity. Construction and operation activities would result in direct output to the industries discussed in **Section 4.7.6**. Businesses in these sectors would generate growth in the form of indirect output resulting from expenditures on goods and services at other area businesses. In addition, employees from Alternative F would generate growth from induced output resulting from expenditures on goods and services at other area businesses. Indirect and induced output could stimulate further commercial growth; however, such demand would be diffused and distributed among a variety of different sectors and businesses in the City of Elk Grove and Sacramento County. As such, significant regional commercial growth inducing impacts would not be anticipated to occur with Alternative F.

The Mall site is situated in the vicinity of adjacent areas that will likely be improved with retail, commercial, and residential developments. These adjacent developments will likely occur, or not occur, irrespective of the implementation of Alternative F. As well, near-term commercial/retail development would likely occur at the Elk Grove Mall site (refer to **Section 2.8** for details). Consequently, there would be no growth inducing effects related to such developments that would occur because of Alternative F.

Development in the City of Elk Grove would be subject to the constraints of its general plan, local ordinances, and other planning policies and documents. New projects resulting from any induced effect would be subject to appropriate project-level environmental analysis. As discussed above, the minimal amount of commercial growth that may be induced by Alternative F would not result in significant adverse environmental growth inducing effects.

### **Alternative G – No Action**

Under the No Action alternative, a change in the current land use of the Twin Cities site is not reasonably foreseeable in the short-term; however, the Elk Grove Mall site would likely be developed in the near-term with commercial/retail uses given the recently renewed development applications with the City of Elk Grove. None of the adverse or beneficial induced effects identified for the development alternatives

would be anticipated to occur. However, the City of Elk Grove would likely incur benefits from operation of commercial/retail establishments at the Elk Grove Mall Site.

## 4.15 CUMULATIVE EFFECTS

### 4.15.1 INTRODUCTION

Cumulative effects are defined as those effects to the environment resulting from the incremental effect of the Proposed Action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 Code of Federal Regulations (CFR) 1508.7). Cumulative effects analysis broadens the scope of analysis to include effects beyond those solely attributable to the direct effects of the alternatives. For a discussion of the growth inducing effects of the proposed alternatives, please refer to **Section 4.14**.

Cumulative effects are defined as the effects:

*“on the environment which result from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 CFR Sec. 1508.7).”*

The analysis in this section expands the geographic and temporal borders to include the effects on specific resources, ecosystems, and human communities that occur incrementally in conjunction with other actions, projects and trends. The purpose of cumulative effects analysis, as stated by the Council on Environmental Quality (CEQ), “is to ensure that federal decisions consider the full range of consequences” (CEQ, 1997).

A cumulative effects analysis broadens the scope of analysis to include effects beyond those attributable solely to the implementation of the alternatives. The process of analyzing cumulative effects, or impacts, requires consideration of cumulative effects issues in each of the traditional components of the Environmental Impact Statement (EIS), including scoping, describing the affected environment, and determining environmental consequences. The incorporation of cumulative effects analysis also aids in the development of alternatives and appropriate mitigation measures.

The analysis in this section considers the incremental effects of the project alternatives on specific resources, ecosystems, and human communities that could occur in conjunction with other reasonably foreseeable actions, projects, and trends. As recommended by CEQ’s *Considering Cumulative Effects*, only those potential cumulative effects that are considered to be relevant or consequential have been discussed in depth (CEQ, 1997a:12).

The status of affected resources is based upon the information provided in **Section 3.0** of this document from specific resource studies that have been undertaken for the alternatives and additional review and analysis. The geographic boundaries of the cumulative effects zone have been determined based on the

nature of the resources affected and the distance that such effects may travel. As an example, increased sedimentation of waterways that result from a project is limited to the watershed in which they occur. As a result, it is only necessary to examine effects within that watershed. Air quality emissions from a project travel over far greater distances and, therefore, necessitate analysis on a County, air basin, or regional level. For this analysis, the geographic boundary of the cumulative effects zone is generally that of southern Sacramento County (County), although with many resources (water, biological etc.) smaller natural or cultural boundaries are used.

#### **4.15.2 CUMULATIVE SETTING**

The cumulative setting includes past, present, and reasonably foreseeable future actions not part of the Proposed Action, but related to cumulative effects. This includes projected growth and zoning as detailed in the Sacramento County (County), the City of Galt (City), and the City of Elk Grove (Elk Grove) General Plans. The cumulative impact analysis within this EIS and associated technical studies (including the traffic impact study provided as **Appendix O**), considered the construction of the list of potential cumulative actions and projects in the vicinity and additional growth in accordance with the County, City, and Elk Grove General Plans.

The status of affected resources is based upon the information provided in **Section 3.0** of this document, from specific resource studies that have been undertaken for the project alternatives, and additional review and analysis. Cumulative effects analysis is based on the assumed enforcement of federal, State, and local regulations, including the implementation of the policies outlined in the County, City, and Elk Grove General Plans. Cumulative impacts for each environmental issue area are discussed below for Alternatives A through F.

The most substantial changes that are expected to occur in the region's environment will occur as the result of the population and employment growth that is estimated to occur over the next 20 years. The amount of growth expected to occur in the region is discussed in **Section 3.7**. Several casinos in the region, two of which are proposed and several of which are existing, are considered in the cumulative environment. These casinos are listed in **Table 4.7-3** and discussed in **Section 4.7** and **Appendix U**. The cumulative analysis addresses residential and commercial growth as identified in regional growth projections and local land use plans, and in **Appendix U**.

#### **Potentially Cumulative Actions and Projects**

Major development projects proposed and/or currently being constructed in the vicinity of the Twin Cities site are listed below and are assumed under cumulative conditions. These projects were determined based on consultation with local government agencies, including the City of Galt, the County of Sacramento, and the City of Elk Grove, as well as the Traffic Impact Study in **Appendix O**.

### ***Transportation Projects – All Alternative Sites***

A number of transportation projects are planned within the traffic study area, and are listed below (**Appendix O**). It should be noted that this traffic study area incorporates the vicinities of all three alternative site locations analyzed in this EIS (e.g., the Twin Cities site, the Historic Rancheria site and the Elk Grove Mall site). Some of these projects are anticipated to be completed by 2018 and others are expected to be completed by the year 2035:

- Grant Line Road Widening Phase I – Widen from two to four lanes from E. Stockton Blvd. to Waterman Road (expected completion prior to 12/31/18).
- Grant Line Road Widening Phase II – Widen from two to four lanes and add bike lanes, from Waterman Road to Mosher Road (expected completion prior to 12/31/18).
- Twin Cities Road Widening – Widen to four lanes west of Highway (Hwy) 99 to Midway. Widen to four lanes from Marengo Road to Cherokee (expected completion prior to 12/31/35).
- Twin Cities Road/Marengo Road intersection improvements (expected completion prior to 12/31/35).
- Carillion Boulevard Extension – Four lane roadway extension from Vauxhall to Boessow Road.
- Marengo Road Widening – Widen to four lanes from Twin Cities to Simmerhorn Road. Construct new four lane road from Simmerhorn Road to Crystal Way (expected completion prior to 12/31/35).
- Grant Line Road Widening Future Phases - Widen numerous roadway segments from two to four lanes and from four to six lanes (expected completion prior to 12/31/35). Note that this project, in combination with the earlier Grant Line Road widening projects listed above, is commonly known as the Capital Southeast Connector.
- Kammerer Road Extension and Widening – Construct new four lane Kammerer Road extension from Bruceville Road to I-5. Widen by two lanes from west of Hwy 99 to Bruceville Road (expected completion prior to 12/31/35).
- Elk Grove Boulevard/Hwy 99 Interchange – Provide a northbound loop on-ramp to Hwy 99 from East Stockton Boulevard (expected completion prior to 12/31/35).

### ***Development Projects***

Through year 2035, projected development within the City of Galt’s sphere of influence includes the addition of approximately 2,564 new residential dwelling units and approximately 117 acres of non-residential growth, including residential and non-residential growth as part of the Eastview Specific Plan development (**Appendix O**). A partial list of these development projects is presented in **Table 4.15-1**.

In addition, there are a number of development projects that are anticipated to occur outside of the City of Galt’s Sphere of influence, but within the southern Sacramento County area that are relevant to cumulative effects that may occur at all three alternative site locations. These include the projects listed in **Table 4.15-2**.

**TABLE 4.15-1**  
**CUMULATIVE DEVELOPMENT IN THE CITY OF GALT**

Project Name	Type	Description	Site Acres
Walker Park	Public/Quasi Public	Community Park with: 2 Soccer Fields 1 Soccer/Football field 2 Little League Diamonds Volleyball Courts Tennis Courts Basketball Courts Picnic Facilities Walking Trail	50
Fairway Oaks	Residential	100 single family dwellings	42.9
Park Creek Village-Planned Unit Development	Residential	39 age-restricted detached single family dwellings	15.7
River Oaks Unit 3	Residential	274 single family dwellings	79.3
Parlin Oaks P.U.D.	Residential	223 townhomes	16
Creekside 3	Residential	71 single family dwellings	20.07
The Village at Lexington Heights	Residential	65 single family dwellings	20.28
Creekside 4	Residential	67 single family dwellings	21
Morali Estates	Residential	50 single family dwellings	12.64
Four Seasons Estates	Residential	26 single family dwellings	5.74
Carillion corners Retail Center	Commercial	77,594 sf retail center	9.6
Dry Creek Oaks	Residential	202 senior single family dwellings plus high density senior living, assisted living and commercial office	> 50
Cedar Flats Estates	Residential	120 single family dwellings	30
Eastview/Liberty Ranch	Residential	Up to 1,744 residential units, parks, community facilities and an elementary school	504
Galt Village Shopping Center	Commercial	107,239 sf retail center	17
Source: City of Galt, 2013 and 2nd quarter 2015.			

**TABLE 4.15-2**  
**CUMULATIVE DEVELOPMENT IN THE CITY OF ELK GROVE AND SOUTHERN SACRAMENTO COUNTY**

Project Name	Type	Description	Site Acres
Waterman Park	Commercial and Residential	East of Waterman Road and west of Grant Line Road	74.6
Fieldstone South	Residential	129 single family dwellings	28.14
Lent Ranch Special Planning Area	Mixed	Also known as Elk Grove Mall. 280 multi-family units, 299 single family dwellings, over 1 million square feet of commercial, and up to 3.1 million square feet of retail.	295
Outlet Collection	Retail	775,000 square feet of retail	N/A
Laguna Ridge Specific Plan	Mixed	5,087 single family dwellings and lots 204 multi-family units 216 residential condos 632 age restricted single family dwellings 222 senior multi-family units 37 acres of R&D facilities Retail	1,900
Capital Reserve Project	Mixed	84 single family lots and 3.2 acres for future commercial uses	16.7
Sterling Meadows	Residential	976 single family lots 200 multi-family lots 14-acre community park 5-acre neighborhood park 5 acres pathways 15-acre water detention basin Fire station	200
Southeast Policy Area	Mixed	4,790 dwelling units	1,200
Civic Center and Community Park	Mixed	Aquatics center Approximately 30,000-sf community building with senior and veterans centers	76
East Franklin Specific Plan	Mixed	51 parcels ranging from 0.28 to 129.38 acres in size 10,103 dwellings in a variety of types and densities Retail/commercial, parks and open space, schools, public facilities	2,474.2
Ridge Shopping Center and Costco	Commercial	226,000 sf of commercial space 150,000 sf warehouse store and 30 pump fueling station	40
Elk Grove Multi-Sport Park Complex	Recreational	16 multi-sport fields, playground, running path, ad par-course	99.57
Note: Lent Ranch and The Marketplace at Elk Grove are located in the immediate vicinity of the Mall site described in Alternative F. Source: City of Elk Grove, 2014.			

### **4.15.3 ALTERNATIVE A – TWIN CITIES CASINO RESORT**

The effects of Alternative A in conjunction with the cumulative setting identified above are presented below. Effects are described for each of the subject areas of the environment described in other portions of this EIS.

#### **Geology and Soils**

Cumulative effects associated with geology and soil resources may occur as a result of future developments in combination with Alternative A. Topographic changes may be cumulatively significant if the topography contributes significantly to environmental quality with respect to drainage, habitat, public safety or other values. Major changes to topography are not proposed under Alternative A or any of the other cumulative projects listed above. No significant cumulative impacts in this area are anticipated.

Soil loss could be cumulatively considerable if the project alone would not result in significant loss of topsoil, but taken together with all other developments may result in significant depletion of available soils. Local permitting requirements for construction would address regional geotechnical and topographic conflicts, seismic hazards, and resource extraction availability. Approved developments, including those listed above, would be required to follow applicable local permitting procedures. In addition, the project and all other developments that disturb one acre or more must comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which requires that best management practices (BMPs) be implemented to address water quality degradation by preventing erosion, as outlined in **Section 5.2**. Therefore, implementation of Alternative A would not result in significant cumulative effects to geology or soils.

#### **Water Resources**

##### ***Surface Water and Flooding***

Cumulative effects to water resources may occur as the result of buildout of the County and City General Plans, including the cumulative projects listed above in combination with Alternative A. Examples of potential effects include increased sedimentation, increased pollution, and increased stormwater flows. Stormwater discharges from residential and commercial areas are of concern in managing surface water quality. Pollutants that accumulate in the dry summer months, such as oil and grease, asbestos, pesticides, and herbicides, may create water quality problems due to their presence in high concentrations during the first major storm event.

A watershed's runoff characteristics are altered when impervious surfaces replace natural vegetation. Changes in runoff characteristics may increase stream volumes, increase stream velocities, increase peak discharges, shorten the time to peak flows, and lessen groundwater contributions to stream base-flows during non-precipitation periods. Urban areas also have sources of non-point source pollution that can

affect regional water quality. Construction and implementation of the proposed development projects listed above may likewise affect water quality by increasing sedimentation and pollution, and increasing stormwater flows. However, the projects would include erosion control measures in compliance with the NPDES permit program and the United States Environmental Protection Agency (USEPA). As described in **Section 4.3** and detailed in **Appendix J**, stormwater detention basins would be constructed to collect, hold, and treat surface water under Alternative A. The basins would discharge to vegetative swales and level spreaders that release runoff as overland flow into Laguna Creek. Other cumulative projects would have similar precautionary features incorporated into their design. Therefore, implementation of Alternative A in combination with other development would not result in significant cumulative effects to surface water and flooding.

### ***Water Quality***

Concurrent construction of Alternative A and other cumulative projects identified above could result in cumulative effects to water quality. Construction activities could result in erosion and sediment discharge to surface waters, potentially effecting water quality in downstream water bodies. In addition, construction equipment and materials have the potential to leak, thereby discharging oils, greases, and construction supplies into stormwater, potentially affecting both surface water and groundwater. To mitigate potential adverse effects, approved developments would be required to implement erosion control measures and construction BMPs via a site-specific SWPPP in compliance with the State of California General Permit for Discharges of Storm Water Associated with Construction Activity, or compliance with USEPA stormwater regulations. With the implementation of measures identified in **Section 5.2**, Alternative A would not result in adverse cumulative effects to water quality.

### ***Groundwater***

Buildout of the County and City General Plans could result in cumulative effects to groundwater if the total water demand of approved projects, including the future developments identified above and Alternative A, exceed the recharge capacity of the groundwater basin. As discussed in **Section 3.10**, the City obtains its primary water supply from the Cosumnes Subbasin of the San Joaquin Valley Groundwater Basin (City of Galt, 2013).

As discussed in **Section 3.3** and **Appendix K**, there does not appear to be localized groundwater overdraft in the vicinity of the Twin Cities site, and the Cosumnes Subbasin as a whole does not appear to be in a state of overdraft (**Appendix K**). Future demands on the groundwater basin by cumulative development would be controlled by City and County land use authorities, as well as by the recently passed Senate Bill 1168, which requires local agencies to create groundwater management plans, and Assembly Bill 1739, which allows the state to intervene if local groups do not adequately manage groundwater resources. Based on the short term availability of groundwater for existing uses and planned development, and the requirement for future groundwater management activities, coupled with the

mitigation specified in **Section 5.2** and **Section 5.3**, cumulative impacts to groundwater would not be substantial.

### ***Groundwater Quality***

Wastewater generated by Alternative A and the buildout of the County and the City's General Plans, including the future developments discussed above, would be treated and disposed of on-site or through connection to the City/County municipal sewer system. Under Option 1 of Alternative A, wastewater would be treated at an on-site wastewater treatment plant (WWTP). To meet the USEPA wastewater treatment criteria, the Tribe would use an immersed membrane bioreactor (MBR) system to provide tertiary-treated water for reuse or disposal. Reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation. Treated effluent would be discharged through sub-surface disposal, or a combination of spray disposal and sub-surface disposal. Both options for discharge of treated effluent are detailed in **Section 2.2.5**. Discharge of treated effluent would not adversely impact groundwater quality due to the high level of treatment. Additionally, percolation through the soils would provide additional filtration of any remaining constituents. Under Option 2 of Alternative A, wastewater treatment would be provided by the City of Galt through a connection to the City's WWTP. Wastewater at the City WWTP is treated and discharged via a Regional Water Quality Control Board (RWQCB) NPDES permit. No adverse effects to surface water or groundwater quality would occur under either option. Therefore, Alternative A would not result in significant adverse cumulative effects to groundwater quality.

### **Air Quality**

#### ***Operational Emissions***

Operation of Alternative A would result in the generation of mobile emissions from patron, employee, and delivery vehicles, as well as stationary source emissions from combustion of natural gas in boilers and other equipment. Emissions were estimated using CalEEMod air quality modeling program and USEPA AP-42 emission factors. Emission estimates and applicable General Conformity *de minimis* thresholds for Alternative A in the cumulative year 2035 are provided in **Table 4.15-3**. CalEEMod output files are included in **Appendix S**. Increased gas mileage and improved fleet emission controls of trucks and vehicles in the future are accounted for in CalEEMod. The increase in future gas mileage is attributed to improved fuel efficiency technology and stricter federal and state regulations.

#### ***Carbon Monoxide Hot Spot Analysis***

Hot Spot Analysis is conducted on intersections that after mitigation would have a level of service (LOS) of E or F (Caltrans, 2014b). After the implementation of recommended mitigation for the project alternatives, no intersection would have an LOS or an increase in delay in the cumulative year 2035 that would warrant a Hot Spot Analysis (refer to **Appendix O**). No significant cumulative impacts would occur and no further analysis is needed.

**TABLE 4.15-3**  
ALTERNATIVE A UNMITIGATED 2035 OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.29	1.3	4.18	0.19	0.36	0.36
Area	2.77	0.00	0.05	0.00	0.00	0.00
Energy	0.16	1.46	1.23	0.01	0.11	0.11
Mobile	8.16	26.68	136.01	0.70	51.06	14.14
59 Percent Mobile Reduction for CO*			-80.25			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>11.38</b>	<b>29.44</b>	<b>61.22</b>	<b>0.90</b>	<b>51.53</b>	<b>14.61</b>
De Minimis Threshold	25	25	100	N/A	100	100
Exceed Threshold	No	Yes	No	N/A	No	No
Notes: N/A = Not Applicable; Stationary sources include boilers and emergency generator use; *Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Source: CalEEMod, 2013; USEPA 1995						

### General Conformity Review

Past, present and future development projects contribute to a region's air quality conditions on a cumulative basis; therefore by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of the National Ambient Air Quality Standards (NAAQS). If a project's individual emissions contribute toward exceedance of the NAAQS, then the project's cumulative impact on air quality would be significant. In developing attainment designations for criteria pollutants, the USEPA considers the regions past, present and future emission levels. As stated in **Section 3.4** the Twin Cities site and vicinity is in nonattainment for ozone and PM<sub>2.5</sub> and maintenance for CO and PM<sub>10</sub>. Because project emissions of NO<sub>x</sub> are above the applicable General Conformity *de minimis* threshold, air quality in the region has a potential to be cumulatively impacted. However, with the implementation of mitigation provided in **Section 5.4**, implementation of Alternative A would not cumulatively adversely impact the region's air quality.

### Climate Change

Climate change would not only have global impacts, such as more erratic weather patterns, more frequent droughts, and rising sea level, but climate change would cause regional and local impacts as well. Climate change has the potential to reduce the snow pack in the mountain regions, increase drought periods, and reduce water tables in California, potentially directly affecting the Twin Cities site (CARB, 2007c). Development of Alternative A would result in an increase in GHG emissions related to mobile sources (trips generated), area sources (components of Alternative A that directly emit GHG), and indirect sources related to electrical power generation.

### *Methodology*

United States Supreme Court precedent, *see, e.g., Massachusetts v. EPA*, 549 U.S. 497 (2007) and *Utility Air Regulatory Group v. EPA*, 134 S. Ct. 2427 (2014) discussing USEPA's authority to regulate GHGs from mobile and stationary sources and the increasing scientific consensus about the impact of GHG emissions on global climate change have resulted in general guidance from the CEQ regarding appropriate GHG analysis for federal agencies to use in NEPA documents such as this EIS. See **Section 3.4**.

The approach used herein involves a combination of quantitative and qualitative analysis focusing on the project's impact on federal and California's efforts to reduce cumulative statewide GHG emissions. As discussed in **Section 3.4**, there are no specific thresholds for GHG emissions in the final CEQ guidance. Nonetheless, the threshold cited in the Draft EIS is considered to be a reasonable and conservative threshold for determining when GHG emissions rise to a significant level. Thus, cumulative contributions associated with a development alternative would be less than significant if the project emits 25,000 MT or less of CO<sub>2e</sub> per year. The following analysis is consistent with the CEQ's Revised Draft Guidance on the Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in NEPA Reviews, released on December 18, 2014, which requires that a NEPA analysis of climate change quantify project-related GHG emissions and mitigate those emissions, particularly if the project is projected to emit GHG in amounts greater than or equal to 25,000 metric tons (MT) per year or more of carbon dioxide equivalence (CO<sub>2e</sub>) and evaluate possible GHG mitigation.

Climate change is a global issue that is not being caused by any single development project, but by global increases in atmospheric GHG concentrations. Thus, climate change is most effectively addressed on a global or regional level. California's global warming policies and legislation (most notably Executive Order S-3-05 and AB 32) are intended to be regional approaches to ensure that statewide emissions are reduced substantially in the future (to levels much lower than existing levels).

USEPA and CARB approved CalEEMod emissions modeling software was used to estimate construction, area, mobile, energy, waste, and water GHG emissions resulting from the proposed alternatives. USEPA AP-42 emission factors were used to determine stationary source GHG emissions.

The CARB and the Climate Action Team (CAT) identified approximately 126 strategies and measures that may be utilized by the state to meet its emissions reduction targets in 2010, 2020, and 2050. Most of these measures focus on statewide action meant to curb emissions by changes in statewide planning or policies rather than changes to individual development projects. However, some of the measures may be directly applicable to specific industries or individual commercial developments. Should a development alternative comply with all directly applicable measures, the alternative would support the State's efforts to significantly reduce its cumulative contribution to global climate change (to levels recommended by the Intergovernmental Panel on Climate Change (IPCC) and CARB's Updated Climate Change Scoping Report [CARB, 2014]) and the associated impacts.

The Proposed Project complies with the strategies currently identified by CARB or CAT to comply with Executive Order S-3-05 or AB 32, provided that the strategies can be applied to proposed development alternatives, although these strategies are not applicable on federal trust land.

*Carbon Dioxide Equivalent*

Carbon dioxide equivalent (CO<sub>2</sub>e) is a method by which GHGs other than CO<sub>2</sub> are converted to a CO<sub>2</sub>-like emission value based on a heat-capturing ratio. As shown in **Table 4.15-4**, CO<sub>2</sub> is used as the base and is given a value of one. CH<sub>4</sub> has the ability to capture 21 times more heat than CO<sub>2</sub>; therefore, CH<sub>4</sub> is given a CO<sub>2</sub>e value of 21. Emissions are multiplied by the CO<sub>2</sub>e value to achieve one GHG emission value. By providing a common measurement, CO<sub>2</sub>e provides a means for presenting the relative overall effectiveness of emission reduction measures for various GHGs in reducing project contributions to global climate change.

**TABLE 4.15-4**  
GREENHOUSE GAS CO<sub>2</sub> EQUIVALENT

Gas	CO <sub>2</sub> e Value
CO <sub>2</sub>	1
CH <sub>4</sub>	21
N <sub>2</sub> O	310
HFCs/PFCs <sup>1</sup>	6,500
SF <sub>6</sub> <sup>1</sup>	23,900
Note: CO <sub>2</sub> e =Carbon dioxide equivalent <sup>1</sup> High-global warming potential pollutants CH <sub>4</sub> = methane, N <sub>2</sub> O = nitrous oxide HFCs/PFCs = hydroflourocarbons/perflourocarbons SF <sub>6</sub> = sulfur hexaflouride Source: IPCC, 2014.	

**Table 4.15-5** estimates Alternative A direct GHG emissions at 7,782.7 MT of CO<sub>2</sub>e per year and indirect emissions of 51,226.6 MT of CO<sub>2</sub>e per year. This estimate was calculated by amortizing construction emissions of approximately 3,564.5 MT of CO<sub>2</sub> over 1.5 years and adding them to operational emissions.

Project-related GHG emissions are above 25,000 MT of CO<sub>2</sub>e per year and therefore have the potential to result in a significant cumulative effect to climate change. To reduce potential GHG emissions, GHG reduction mitigation measures are recommended in **Section 5.4**, and implementation of these measures would therefore result in a less than significant impact to climate change.

As discussed above and in **Section 3.4**, California’s strategies and measures would result in a reduction of statewide emissions, including emissions resulting from implementation of Alternative A, to levels below current background levels. Of the approximately 126 strategies and measures currently under consideration that would ensure a statewide reduction in GHG emissions, only three would apply to Alternative A (refer to **Table 4.15-6**). The other policies do not apply to Alternative A because they

either apply to state entities, such as CARB, are planning-level measures, or they apply to particular industries, such as the auto repair industry.

**TABLE 4.15-5**  
ALTERNATIVE A CONSTRUCTION AND OPERATIONAL MITIGATED GHG EMISSIONS

Direct	GHG Emissions (MT of CO <sub>2</sub> e/year)
Grading, Building, etc.	2,376.1
Stationary Sources	5,406.46
Area	0.1
Indirect	GHG Emissions (MT of CO <sub>2</sub> e)
Energy	3,772.5
Mobile	44,638.3
Waste	2,622.7
Water	193.1
<b>Total Operation GHG Emissions</b>	<b>59,009.26</b>
Notes: MT = metric tons; CO <sub>2</sub> e = carbon dioxide equivalent <sup>1</sup> Construction-related GHG emissions were amortized over the construction period to determine annual construction emissions. Stationary sources include boilers and emergency generator use. Source: CalEEMod, 2013, USEPA 1995.	

**TABLE 4.15-6**  
COMPLIANCE WITH STATE EMISSIONS REDUCTION STRATEGES

Executive Order S-3-05 / AB 32 Strategy	Project Compliance
Diesel Anti-Idling: In July 2004, the CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	Alternative A would be located on trust lands and thus not subject to CARB restrictions on on-site diesel-fueled commercial vehicle idling. Mitigation measures are provided in <b>Section 5.4</b> would make the project consistent with this strategy.
Achieve 50 percent statewide Recycling Goal: Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48 percent has been achieved on a statewide basis. Therefore, a 2 percent additional reduction is needed.	Solid waste services are expected to be provided by the County of Sacramento, which is subject to the state's recycling requirements. The development would not affect County diversion goals as waste from tribal land is classified as out-of-state waste and is not calculated in local waste diversion statistics. Although the diversion stream will not be affected, the waste stream would increase. Mitigation measures are provided in <b>Section 5.4</b> , which would make the project consistent with this strategy.
Water Use Efficiency: Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions	With mitigation, Alternative A would be consistent with this strategy. Mitigation measures are provided in <b>Section 5.4</b> .
Note: AB= Assembly Bill Source: CARB, 2014	

As shown in **Table 5-3**, Alternative A, with mitigation, would be in compliance with the applicable state climate change strategies. Furthermore, direct and indirect CO<sub>2</sub>e emissions would be a potentially significant cumulative effect and mitigation is recommended in **Section 5.4** to reduce the potential for adverse cumulative effects associated with climate change.

## **Biological Resources**

Cumulative effects to biological resources would occur if Alternative A, in conjunction with buildout of County and City General Plans, including the projects listed within **Section 4.15.2**, would result in a significant effect to federally-listed species, contribute to a reduction in the number of a listed species that would affect the species long term sustainability, cause development that permanently disturbs a wildlife corridor, results in an effect to sensitive habitat that is of regional significance, or results in a conflict with regional conservation goals.

### ***Wildlife and Habitats***

As identified in **Section 4.5**, the Twin Cities site does not contain United States Fish and Wildlife Service (USFWS) designated critical habitat. Most habitat disturbance as a result of Alternative A would occur in agricultural areas, while the remaining disturbance would occur as a result of development within the man-made ditch (Drainage 2). Despite the disturbed characteristics of the majority of the Twin Cities site, development of Alternative A could potentially impact the habitat of sensitive biological resources including federally protected species. As discussed in **Section 4.5**, there are four aquatic habitat types within the Twin Cities site. However, Drainage 2 is the only aquatic habitat located within the impact area and all other aquatic habitats are slated to be avoided during construction and implementation of Alternative A. None of the habitats that would be affected by implementation of Alternative A are considered sensitive biological communities; therefore, no significant adverse cumulative effects would occur. Potential cumulative effects to federally-listed species are discussed below.

### ***Federally-Listed Species***

As discussed in **Section 3.5**, five federally-listed wildlife species have the potential to occur on the Twin Cities site. Mitigation identified in **Section 5.5** includes measures that would avoid or minimize impacts to federally-listed species. Similarly, all other projects in the region are required to comply with the Endangered Species Act by avoiding or minimizing effects to protected species. Therefore, after mitigation, implementation of Alternative A would not contribute to adverse cumulative effects to federally-listed species.

### ***Migratory Birds***

Alternative A would not result in significant cumulative effects to nesting migratory birds. However, disturbance to migratory bird habitats and increases in human activity from other proposed projects in the area could incrementally contribute to past, present, and future effects to migratory birds. The development of other projects considered in the cumulative analysis are required to comply with the

Migratory Bird Treaty Act, which will reduce the overall impact to migratory birds. Mitigation measures provided in **Section 5.5** would minimize significant effects to migratory birds. Therefore, implementation of Alternative A would not result in significant cumulative effects to nesting migratory birds.

Increased lighting has been shown to increase collisions of birds and structures, as well as causing a disorientation effect on species. Thus, nighttime lighting from the operation of the Alternative A could have a potentially significant impact on both migrating and local bird populations. Mitigation measures to reduce potentially significant nighttime lighting impacts are identified in **Section 5.13**, which would minimize significant effects to migratory bird collisions. Therefore, implementation of Alternative A would not contribute to adverse cumulative effects associated with nighttime lighting.

### ***Wetlands and/or Waters of the U.S.***

As discussed in **Section 4.5**, implementation of Alternative A, after mitigation, would not result in adverse effects to waters of the U.S. Project design ensures that Alternative A would avoid wetlands and waterways within the Twin Cities site to the extent possible. Indirect effects to wetlands and waterways would be avoided by the implementation of project features designed to minimize impacts and provide buffers to wetlands, control stormwater and wastewater discharges, and protect the quality of runoff water through conditions of the NPDES permit. Other cumulative projects would likewise avoid or mitigate for impacts to wetlands and Waters of the U.S. in compliance with Section 404 of the Clean Water Act. Therefore, with the implementation of the mitigation measures in **Section 5.5**, Alternative A would not contribute to adverse cumulative effects to wetlands and waters of the U.S.

### **Cultural Resources**

As described in **Section 3.6**, an archaeological investigation of the area of potential effects (APE) (**Appendix M**) revealed three previously unrecorded historic properties within the Twin Cities site. Given the absence of pre-contact resources and the locations of the identified historic properties away from the proposed development area within the Twin Cities site, there would be no adverse effects to known National Register eligible or listed properties as a result of Alternative A. Alternative A, however, may affect previously unknown buried archaeological resources. As discussed in **Section 4.6**, direct effects to unknown cultural resources associated with Alternative A would be reduced to a minimal level with the implementation of mitigation measures specified in **Section 5.6**. Approved projects would be required to follow federal, state, and local regulations regarding cultural resources and inadvertent discoveries of cultural resources. All other cumulative projects would be required to avoid or mitigate for impacts to cultural resources in compliance with local, state and federal law. Therefore, with the implementation of the mitigation measures outlined in **Section 5.6**, Alternative A would not result in adverse cumulative effects to cultural resources.

## **Socioeconomic Conditions**

Cumulative socioeconomic effects could occur in the project area as the result of developments that affect the lifestyle and economic well-being of residents.

Alternative A would introduce new economic activity in the counties of Sacramento and San Joaquin and in the City of Galt. This would be a beneficial effect to the region on several different socioeconomic levels. Because the region was significantly impacted by the 2009 economic recession and because the recession had an outsized impact on the region's housing values and vacancy rates, the greater Sacramento County and San Joaquin County area has not yet fully recovered from the recession. Excess economic capacity in the areas of employment and housing may continue to linger through the anticipated project opening. When considered in the context of the City of Galt's General Plan, including the cumulative projects listed previously, Alternative A may contribute towards cumulative socioeconomic effects including impacts to the local labor market, housing availability, increased costs due to problem gambling, and impacts to local government. These effects would occur as the region's economic and demographic characteristics change, as the population grows, and as specific industries expand or contract. However, these cumulative effects would not be significant due to the existing economic and housing capacity in the region. Planning documents for Sacramento County, San Joaquin County, and the City of Galt will continue to designate land uses for businesses, industry, and housing, as well as plan public services for anticipated growth in the region. Alternative A would not contribute to significant adverse cumulative socioeconomic effects. Specific potential cumulative effects are described below.

### ***Economy and Employment***

As described in **Section 4.7**, the construction and operation of Alternative A are anticipated to generate full-time equivalent employment positions of approximately 2,751 and 2,948, respectively. When analyzed in combination with other anticipated projects, Alternative A will have a positive effect on regional employment. The operation of Alternative A would significantly increase the area's economic reliance on the entertainment and recreation business while simultaneously increasing the area's draw and market share of this industry segment.

### ***Population and Housing***

Alternative A's anticipated impact to area housing is analyzed in **Section 4.7**. Specifically, the operation of Alternative A is anticipated to result in the creation of approximately 2,948 full-time equivalent jobs. As described in **Section 4.7**, southern Sacramento County and San Joaquin County currently have higher than usual unemployment rates, which means that it is unlikely that substantial in migration will need to occur to staff Alternative A construction and minimal in migration will be required to staff the initial year or two of operations. In addition, and as discussed in **Section 4.7**, the two-county region also currently has unusually high housing vacancy, although such vacancy will likely decline as the economy normalizes. As discussed above, approximately 2,564 residential units that will be developed in the City of Galt's Sphere of influence (**Appendix O**) and residential units will also be constructed outside of the

sphere of influence that are within reasonable commuting range of the Twin Cities site. The amount of anticipated non-residential development that will likely occur in the region is substantial, but it is unlikely to be large enough to create significant in-migration to the region. Consequently, when analyzed at a cumulative level, Alternative A will likely create some incremental demand for housing and some increases in population in the foreseeable future, but such increases would not be significant.

### ***Substitution Effects***

In addition to the Proposed Project, there are two other large gaming venues anticipated to open within the larger regional gaming market: 1) the Enterprise Rancheria (“Enterprise”) casino, and 2) the North Fork Rancheria Casino and Hotel, which is sometimes referred to as Station Casinos Madera (“North Fork”). The process of seeking appropriate approvals for these two projects was commenced prior to the planning for the Proposed Project. Specifically, the Final EISs for both Enterprise and the North Fork were completed during 2009. The ratification of the state gaming compact for North Fork was the subject of California Proposition 48, which was on the November 2014 ballot. The timing and likelihood of either venue opening is not certain. The substitution analyses described in **Section 4.7** assume that both projects occur prior to 2019.

**Section 4.7** describes the competitive effects anticipated to occur from the first full year of operations of the various alternatives, including Alternative A. In addition to the competitive effects estimated in **Section 4.7**, the opening of both Enterprise and North Fork would result in competitive effects on the gaming venues described in **Section 4.7**. As a result, the cumulative effects on some of the competing gaming venues would likely be greater than the estimates shown in **Table 4.7-3**. For the purpose of assessing cumulative competitive effects, the assumption that the openings of both Enterprise and North Fork occur prior to the Wilton Rancheria opening results in a more conservative analysis in comparison to an alternative assumption that either venue does not open, or opens subsequent to the commencement of operations of Alternative A.

The precise cumulative competitive effect would depend on a number of factors, including the distances between the three gaming projects (i.e., the Wilton Rancheria Casino Project described herein, Enterprise and North Fork) and competitors, the relative sizes of the projects and competitors, the actual date that each of the three gaming commences operations, and other factors. Summarized below is a discussion of some of these factors:

- **Distances between venues.** The opening of Enterprise and North Fork will likely individually have economic effects on competing casinos, but it is unlikely that there will be a collective Enterprise plus North Fork effect on any one competitor. This is because the preferred site for Enterprise is located approximately 60 miles to the north of the three alternative project sites described herein (as measured in roadway miles), whereas the preferred North Fork facility is located approximately 120 miles to the south. In other words, these two venues are located in opposite directions of the project sites described in this EIS. The combination of the Wilton

Rancheria and Enterprise would produce a measurable cumulative economic effect on some of the competing casinos in **Table 4.7-3** because of their respective locations. Regarding the competing venues depicted in **Table 4.7-3**, the combination of the Wilton Rancheria and Table Mountain would most likely have a material effect only on the Black Oak Casino.

- **Relative size.** All other factors being equal, competitive effects tend to vary in proportion to project size. As described in **Appendix U**, the projected year 2019 gaming revenue from Alternative A is estimated at approximately \$370 million, exclusive of poker gaming. In comparison, the Enterprise preferred alternative is estimated to generate less than one-half of this projected revenue (Enterprise Final EIS). Gaming revenue estimates for the North Fork preferred alternative are within a range of approximately one-third to two-thirds of Alternative A revenues (AES, 2014).
- **Project timing.** Competitive effects resulting from specific projects usually decline with the passage of time, provided that there is real (i.e., inflation adjusted) economic growth in a region (Andersen, 1996). Consequently, the greater the amount of time that elapses between the present and the date that each project opens, the more likely it is that the projects' competitive effects will be diluted by economic growth.

Because of the aforementioned factors, it is anticipated that the competitive effects from the cumulative operations of Alternative A, Enterprise and North Fork on each of the competing gaming venues will be slightly greater than the figures depicted in **Table 4.7-3**.

## **Transportation**

In the year 2035, Alternative A would result in the addition of vehicle traffic to local intersections. A traffic impact study (TIS) prepared for Alternative A is provided in **Appendix O**. This section summarizes the results of this study and describes potential adverse effects that would occur to intersections, roadways, or freeway facilities within the study area.

Table 19 in **Appendix O** provides intersection LOS in 2035 under Alternative A. As indicated in the table, the following study intersections are projected to operate at unacceptable LOS under cumulative conditions.

- West Stockton Boulevard/Twin Cities Road
- East Stockton Boulevard/Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Ramps (at Mingo Road)
- Grant Line Road/E Stockton Boulevard

Table 21 in **Appendix O** provides roadway segment LOS in 2035 under Alternative A. As shown in the table, all study roadway segments operate at acceptable LOS in the cumulative condition with the addition of Alternative A traffic.

Tables 24 and 25 in **Appendix O**, respectively, provide freeway mainline and ramp LOS for Alternative A under the cumulative condition.

As shown in Table 24 in **Appendix O**, with the addition of Alternative A traffic, the following freeway mainline segments are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative A traffic).

- Hwy 99 Between Ayers Lane and Walnut Avenue (NB and SB)
- Hwy 99 Between Walnut Avenue and Twin Cities Road (NB and SB)
- Hwy 99 Between Twin Cities Road and Mingo Road (NB and SB)
- Hwy 99 Between Mingo Road and Arno Road (NB and SB)
- Hwy 99 Between Arno Road and Dillard Road (NB)
- Hwy 99 Between Dillard Road and Grant Line Road (NB)
- Hwy 99 Between Grant Line Road Elk Grove Boulevard (NB)
- Hwy 99 Between Elk Grove Boulevard and Bond Road (NB)

As shown in Table 25 in **Appendix O**, with the addition of Alternative A traffic, the following freeway ramps are projected to operate at an unacceptable LOS (note that most ramps would also operate at unacceptable LOS even without Alternative A traffic).

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (north)
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (south)
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Twin Cities Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Mingo Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

It should be noted that the West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road would operate at unacceptable levels of service with or without the project. However, the traffic density at this freeway ramp would not increase by more than five percent. Additionally, as part of the mitigation included in **Section 5.8**, West Stockton Boulevard would be closed from just north of Twin Cities Road to Mingo Road and the Hwy 99 SB ramps would create a new intersection with Mingo Road at the new interchange.

As shown in the referenced tables, project traffic will add to the background congestion at several study locations. There are study locations that will operate at unacceptable LOS as a result of Alternative A, or will operate at unacceptable LOS without the project and experience an increase in the average delay of

five seconds or more (intersections) or an increase in density of more than five percent with the addition of the project (mainline segments and ramps). Significant congestion is expected with and without the project. Fair share contributions and other mitigation for project impacts are recommended in **Section 5.8**.

### ***Transit, Bicycle, and Pedestrian Facilities***

Because sufficient parking would be available on-site and sidewalk and bicycle facilities do not provide direct access to the Twin Cities site, and the proximity of the Hwy 99 to the Twin Cities site, no significant cumulative effects would occur to pedestrian or bicycle facilities as a result of Alternative A. No current plans exist to service Alternative A with public transit. No cumulative impacts to transit are anticipated.

### **Land Use**

Development in the County and City is guided in part by the General Plans, applicable Specific Plans, Zoning Ordinances, and Redevelopment Plans. Planned development projects within the County and the City are consistent with these documents and policies, which prevent disorderly growth or incompatible land uses. While Alternative A would not be subject to local land use policies, as discussed in **Section 4.9**, the Tribe has agreed to develop tribal projects on the trust land in a manner that is generally consistent with the County and the City municipal codes. Alternative A would not disrupt neighboring land uses, prohibit access to neighboring parcels, or otherwise conflict with neighboring land uses. Therefore, Alternative A would not result in adverse cumulative effects to land use planning.

### ***Agriculture***

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Although the Twin Cities site is currently being used for agricultural production, it is a property planned to be removed from an agricultural designation in the 2030 City General Plan. In formulating its General Plan, the City balanced the sometimes competing need for jobs, housing, and business with the need for open space and agriculture. Given the location of the Twin Cities site within the Galt's Sphere of Influence and planned commercial development area, implementation of Alternative A would not contribute to significant cumulative adverse effects to agricultural lands.

### **Public Services**

#### ***Water Supply***

Alternative A would receive its domestic water supply from either the development of on-site groundwater wells (Option 1), or through connections to the City's municipal water system infrastructure (Option 2). Refer to **Section 2.2.5** for a further discussion of water supply options under Alternative A.

No municipal water systems would be affected by Water Supply Option 1 as no connections are proposed. Potential cumulative impacts to groundwater were discussed previously. Therefore, implementation of Alternative A Water Supply Option 1 would have no cumulative adverse effect on municipal water supply systems.

Under Alternative A Water Supply Option 2, the Tribe would contract with the City for municipal water. As discussed in **Section 4.10**, the City currently does not have sufficient infrastructure in place to serve Alternative A. In order to meet the water demands of the projected future growth within the City's service area, including the cumulative projects listed above, the City plans to construct additional infrastructure including a treatment system, wells, and pipelines. As discussed in **Section 3.10**, the City has identified and is implementing these improvements to prepare for the future growth. Projects approved for connection to the City's water system would pay the appropriate water capital connection charges and monthly service fees. The planned improvements and corresponding fee structure would allow the City to expand its water supply infrastructure to serve Alternative A and other proposed projects. With the implementation of mitigation measures outlined in **Section 5.10**, Alternative A would not result in significant cumulative effects to the City's water supply system.

### ***Wastewater***

As described in **Section 2.2.5**, Alternative A may tie into the City's wastewater system via a proposed pipeline that would connect directly to the WWTP (Option 2) or develop on-site wastewater utilities (Option 1). Wastewater Option 1 would involve treatment of all wastewater generated by Alternative A and therefore no municipal wastewater systems would be affected; therefore Alternative A Wastewater Option 1 would not result in significant cumulative effects to the City's municipal wastewater system.

Under Alternative A Wastewater Option 2, the Twin Cities site would be connected to the City's nearby WWTP via a new pipeline extending under the railroad tracks to the west. The Tribe would pay the appropriate connection charges and monthly service fees, consistent with any other commercial development. The City of Galt's WWTP currently treats an average of approximately 2.3 million gallons per day (MGD) of wastewater, with existing capacity at 3.0 MGD. A planned expansion to the WWTP would increase capacity to 4.5 MDG by 2020. The 0.7 MGD of available capacity at the City WWTP would accommodate the wastewater demands of Alternative A. Mitigation is included in **Section 5.10** to address the possibility of a municipal sewer connection. With implementation of mitigation, the adverse cumulative effects to the City's wastewater system would be reduced to a minimal level.

### ***Solid Waste***

As described in **Section 3.10**, the Twin Cities Site is located within the service boundaries of the County Municipal Services Agency, Department of Waste Management and Recycling (County DWMR), but service is provided by mostly private franchised hauling companies. The private hauling companies are under franchise agreement with the County DWMR to perform collection and disposal at properties and

convey waste to landfills and recycling stations, as appropriate. Waste generated under Alternative A would be hauled appropriately through disposal at facilities described in **Section 3.10**.

As described in **Section 3.10**, Kiefer Landfill currently accepts 10,815 tons per day of solid waste. The landfill has nearly 113 million cubic yards of available capacity and is estimated to have sufficient capacity to maintain operations through 2064. Growth resulting from buildout of the County and the City General Plans, including the projects listed in **Section 4.15.2**, would increase disposal of solid waste to Kiefer Landfill and the other facilities described in **Section 3.10**. Projected solid waste generation for Alternative A is a small addition to the waste stream and would not significantly decrease the life expectancy of the disposal site and landfills. Since capacity is available for cumulative growth including Alternative A, no significant cumulative effects to solid waste services would occur.

### ***Law Enforcement***

New development, including the cumulative projects listed above, would fund in part County and the City services including law enforcement through development fees and property tax. As discussed in **Section 2.2.5**, under Alternative A, law enforcement services would be provided by the Sacramento County Sheriff's Department (SCSD) and/or the City of Galt Police Department (GPD), while prosecution and court and jail services would be provided by the SCSD. A Tribal security force would provide security patrol and monitoring needs of the casino as needed. Due to existing staffing levels, GPD and SCSD may need additional facilities and equipment to meet the increased need for services due to cumulative growth in the region, including Alternative A. Due to the potential for an increase in calls for service during operation of Alternative A and extended hours of operation at the Twin Cities site, a potentially significant adverse effect could occur. Additionally, an increase in service demands to the California CHP may result from development of the project. However, payments to the State under the Tribal-State compact would offset any impacts to the CHP.

With implementation of the on-site security measures and the conditions of a service agreement between the Tribe and the County and/or City, as discussed in **Section 5.10**, payments by the Tribe would compensate the County and/or City for costs of impacts associated with increased law enforcement services at the Twin Cities site. Therefore, with mitigation, Alternative A would result in a less than significant cumulative effect on public law enforcement services.

### ***Fire Protection and Emergency Medical Services***

New development, including cumulative projects listed above, would be required to fund City and/or County services as well as fire protection and emergency medical response in part through development fees and property taxes. Emergency medical costs are paid primarily by the individual requiring service. Due to the potential for an increase in calls for fire protection services during operation of Alternative A and the extended hours of operation at the Twin Cities site, a potentially significant impact to the Cosumnes Community Service District Fire Department (CCSD Fire Department) could occur. With

implementation of a service agreement between the Tribe and the CCSD Fire Department, as discussed in **Section 5.10**, payments by the Tribe would compensate the CCSD Fire Department for costs of impacts associated with increased fire protection services at the Twin Cities site. Therefore, with implementation of mitigation, Alternative A would result in a less than significant cumulative impact on public fire protection services

The CCSD Fire Department also provides first responder emergency medical service through paramedic staffing on ambulances and engines. The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 12 miles north of the Twin Cities site. On average, the Methodist Hospital has extra bed capacity. Mitigation in **Section 5.10** includes a measure for the Tribe to enter into a service agreement to reimburse CCSD Fire Department for additional demands created by the project alternatives. With this mitigation, Alternative A would not result in a significant cumulative effect on emergency medical services.

### ***Electricity, Natural Gas, and Telecommunications***

Individual projects, including the cumulative projects listed above, would be responsible for paying development or user fees to receive electrical, natural gas, and telecommunications services. As such, the Tribe would pay a fair share of the upgrades needed to avoid affecting the service of existing customers and any infrastructure necessary to provide service to Alternative A. Both Sacramento Municipal Utilities District (SMUD) and Pacific Gas and Electric (PG&E) are expected to have the capacity to provide service to the Twin Cities site (**Section 4.10**; City of Galt, 2009b). Alternative A would not cause significant cumulative effects to energy or telecommunications providers.

### **Noise**

The following identifies possible impacts from project related noise sources in the cumulative year 2035 for Alternative A, such as traffic, heating ventilation and air conditioning (HVAC) systems, parking structure and lots, and deliveries.

#### ***Traffic Noise***

The primary source of noise in the area currently and in anticipated future conditions is traffic. The level of traffic noise depends on: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of trucks in the flow of the traffic. It is not anticipated that speed in the vicinity of the Twin Cities site or the mix of trucks in the traffic would change during the operational phase; however, in the cumulative year 2035 traffic volumes would increase. Cumulative traffic conditions are described in detail in **Appendix O**.

#### ***Highway 99***

As described in the TIS (**Appendix O**), predicted cumulative traffic volumes on Hwy 99 (NB and SB, between Twin Cities Road and Mingo Road) in the year 2035 without project traffic would be 6,283

vehicles per hour. The ambient noise level in the vicinity of Hwy 99 with increased cumulative traffic would be approximately 60.0 (A-weighted decibels) dBA, equivalent noise level (Leq). This is an increase of less than 0.7 dBA from existing conditions (58 dBA). Alternative A traffic in the cumulative year 2035 would be equal to the 2035 no project baseline traffic plus the trips generated by the project that would travel along Hwy 99, resulting in an increase in the ambient noise level of approximately 0.5 dBA Leq. The total cumulative increase from current existing conditions would be less than 1.4 dBA. As discussed in **Section 3.11**, a 3 dBA increase in noise is barely perceivable. Because the cumulative increase in traffic noise levels is less than perceivable, Alternative A would not contribute to significant effects to sensitive receptors located in the vicinity of Hwy 99.

#### *Twin Cities Road*

As described in the TIS (**Appendix O**), traffic volumes without project traffic on Twin Cities Road would be 9,495 vehicles per day in the cumulative year 2035. The estimated ambient noise level in the vicinity of Twin Cities Road, with increased cumulative traffic would be approximately 60.0 dBA, Leq. In the cumulative year 2035, Alternative A would result in a 2.4 dBA Leq increase in the ambient noise level over current conditions, which is imperceptible to human ears. Therefore, Alternative A would not contribute towards significant cumulative effects associated with traffic noise levels for sensitive receptors located along Twin Cities Road.

#### **Vibration and Other Noise Sources**

The potential for cumulative impacts associated with vibration and other noise sources would be the same as the direct effects described in **Section 4.11**. Significant cumulative effects would not occur.

#### **Hazardous Materials**

As discussed in **Section 4.12**, with the incorporation of the BMPs and mitigation outlined in **Section 5.12**, implementation of Alternative A would not result in direct effects associated with hazardous materials management. Approved projects, including those listed previously, would be required to follow applicable federal and state regulations concerning hazardous materials management, including the implementation of construction BMPs dealing with hazardous materials management through the NPDES permitting process. With the implementation of mitigation measures outlined in **Section 5.12**, Alternative A, in combination with other projects, would not result in significant cumulative effects associated with hazardous materials.

#### **Aesthetics**

Cumulative development that takes place would be consistent with local land use regulations, including associated design guidelines. Cumulative effects would include a shift from open, undeveloped lots to views of developed areas, as well as an increase in the density of urban uses within the City of Galt and Sacramento County. However, the development of Alternative A would be generally consistent with the

visual goals of County and City land use regulations. While the Twin Cities site is located adjacent to the Hwy 99 scenic corridor defined by the City, substantial development is present to the east and south of the Twin Cities site. With the implementation of mitigation measures outlined in **Section 5.13**, Alternative A would not result in adverse cumulative impacts to aesthetic resources.

#### **4.15.4 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO**

Alternative B would be constructed on the same parcel of land as Alternative A; therefore, potentially cumulative actions and projects would be the same for Alternative B as that of Alternative A. Refer to **Section 4.15.2**.

#### **Cumulative Effects Previously Addressed**

Cumulative effects to geology and soils, water resources, biological resources, cultural resources socioeconomic conditions, transportation, land use, noise, hazardous materials, and aesthetics as a result of Alternative B would be similar to those of Alternative A. Refer to **Section 4.15.3** for a detailed discussion on potential cumulative effects that could occur as a result of Alternative A. Cumulative effects under Alternative B would be slightly less due to the reduced size of development. Therefore, implementation of Alternative B would also result in minimal adverse cumulative effects to these resource areas. Other resource areas are addressed in detail below.

#### **Air Quality**

##### ***Operational Emissions***

Unmitigated emission estimates and General Conformity *de minimis* thresholds for Alternative B in the cumulative year 2035 are provided in **Table 4.15-7**. CalEEMod output files and AP-42 emission calculations are included in **Appendix S**.

##### ***Carbon Monoxide Hot Spot Analysis***

Similar to Alternative A, Alternative B does not warrant a Hot Spot Analysis. No significant cumulative impacts would occur and no further analysis is needed.

##### ***General Conformity Review***

For information about the Twin Cities site attainment status and potential for regional air quality impacts, refer to **Section 4.15.3**. With the implementation of mitigation provided in **Section 5.2**, implementation of Alternative B would not cumulatively adversely impact the region's air quality.

##### ***Climate Change***

The climate change analysis methodology for Alternative B is the same as Alternative A.

**TABLE 4.15-7**  
ALTERNATIVE B UNMITIGATED 2035 OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.16	0.69	2.4	0.1	0.21	0.21
Area	1.35	0.00	0.001	0.00	0.00	0.00
Energy	0.09	0.83	0.69	0.005	0.06	0.06
Mobile	5.99	19.72	100.46	0.52	37.80	10.47
59 Percent Mobile Reduction for CO*			-59.27			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>7.59</b>	<b>21.24</b>	<b>44.28</b>	<b>0.63</b>	<b>38.07</b>	<b>10.74</b>
De Minimis Threshold	25	25	100	N/A	100	100
Exceed Threshold	No	No	No	N/A	No	No
Notes: N/A = Not Applicable; Stationary sources include boilers and emergency generator use; * Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Source: CalEEMod, 2013, USEPA 1995.						

**Table 4.15-8** estimates Alternative B direct GHG emissions at 4,647.61 MT of CO<sub>2</sub>e per year and indirect emissions of 35,503.4 MT of CO<sub>2</sub>e per year. This estimate was calculated by amortizing construction emissions of approximately 2,264.4 MT of CO<sub>2</sub> over 1.5 years and adding them to operational emissions.

**TABLE 4.15-8**  
ALTERNATIVE B CONSTRUCTION AND OPERATIONAL MITIGATED GHG EMISSIONS

Direct	GHG Emissions (MT of CO <sub>2</sub> e/year)
Grading, Building, etc.	1,509.6
Stationary Sources	3,138.01
Area	0.003
Indirect	GHG Emissions (MT of CO <sub>2</sub> e)
Energy	2,057.4
Mobile	33,037.6
Waste	303.0
Water	105.4
<b>Total GHG Emissions</b>	<b>40,151.01</b>
Notes: BAU = business as usual; MT = metric tons; CO <sub>2</sub> e = carbon dioxide equivalent <sup>1</sup> Construction-related GHG emissions were amortized over the construction period to determine annual construction emissions. Stationary sources include boilers and emergency generator use. Source: CalEEMod, 2013, USEPA 1995	

Direct and indirect CO<sub>2</sub>e emissions have the potential to result in a significant cumulative effect to climate change. To reduce potential GHG emissions, mitigation measures are recommended in **Section 5.4** to reduce climate change impacts to a less than significant level.

The California strategies discussed under Alternative A are the same for Alternative B.

## **Transportation**

Table 32 in **Appendix O** provides intersection LOS in 2035 under Alternative B. As indicated in the table, the following study intersections are projected to operate at unacceptable LOS under cumulative conditions:

- West Stockton Boulevard/Twin Cities Road
- East Stockton Boulevard/Twin Cities Road
- Grant Line Road/East Stockton Boulevard

It should be noted that the intersection of Grant Line Road/East Stockton Boulevard is projected to operate at unacceptable LOS F with or without the addition of Alternative B. However, Alternative B would not increase the average control delay at the intersection by five seconds or more; thus, no significant impact would occur at this location.

Table 34 in **Appendix O** provides roadway segment LOS in 2035 under Alternative B. As shown in the table, all study roadway segments operate at acceptable LOS in the cumulative condition with the addition of Alternative B traffic.

Tables 37 and 38 in **Appendix O**, respectively, provide freeway mainline and ramp LOS for Alternative A under the cumulative condition.

As shown in Table 37 in **Appendix O**, with the addition of Alternative B traffic, the following freeway mainline segments are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative A traffic):

- Hwy 99 Between Ayers Lane and Walnut Avenue (NB and SB)
- Hwy 99 Between Walnut Avenue and Twin Cities Road (NB and SB)
- Hwy 99 Between Twin Cities Road and Mingo Road (NB and SB)
- Hwy 99 Between Mingo Road and Arno Road (NB and SB)
- Hwy 99 Between Arno Road and Dillard Road (NB)
- Hwy 99 Between Dillard Road and Grant Line Road (NB)
- Hwy 99 Between Grant Line Road Elk Grove Boulevard (NB)
- Hwy 99 Between Elk Grove Boulevard and Bond Road (NB)

As shown in Table 38 in **Appendix O**, with the addition of Alternative B traffic, the following freeway ramps are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative A traffic):

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (north)
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (south)
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Twin Cities Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Mingo Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road would operate at unacceptable levels of service with or without the project. However, the traffic density at this freeway ramp would not increase by more than five percent. Additionally, as part of the mitigation included in **Section 5.8**, West Stockton Boulevard would be closed from just north of Twin Cities Road to Mingo Road and the Hwy 99 SB ramps would create a new intersection with Mingo Road at the new interchange.

As shown in the referenced tables, project traffic will add to the background congestion at several study locations. There are study locations that will operate at unacceptable LOS as a result of Alternative B, or will operate at unacceptable LOS without the project and experience an increase in the average delay of five seconds or more or an increase in density of more than five percent with the addition of the project. Significant congestion is expected with and without the project. Fair share contributions and other mitigation for project impacts are recommended in **Section 5.8**.

### ***Transit, Bicycle, and Pedestrian Facilities***

Cumulative impacts to transit, bicycle, or pedestrian facilities would be the same or less than those associated with Alternative A. Refer to **Section 4.15.3**. No cumulative impacts are anticipated.

## **Noise**

The following identifies possible impacts from project related noise sources in the cumulative year 2035 for Alternative B, such as traffic, heating ventilation and air conditioning (HVAC) systems, parking structure and lots, and deliveries.

### ***Traffic Noise***

The primary source of noise in the area is generated by traffic in the cumulative year 2035. The level of traffic noise depends on: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of

trucks in the flow of the traffic. It is not anticipated that speed in the vicinity of the Twin Cities site or the mix of trucks in the traffic would change during the operational phase; however, in the cumulative year 2035 traffic volumes would increase. Cumulative traffic conditions are described in detail in **Appendix O**.

#### *Highway 99*

Predicted cumulative traffic volumes and noise levels on Hwy 99 (NB and SB, between Twin Cities Road and Mingo Road) in the year 2035 without project traffic would be the same as those described under Alternative A; refer to **Section 4.15.3**. The ambient noise level in the vicinity of Hwy 99, with increased cumulative traffic, would increase approximately 0.4 dBA Leq. The total cumulative increase from existing conditions would be less than 2.4 dBA from existing conditions. As discussed in **Section 3.11**, a 3 dBA increase in noise is barely perceivable. Because the cumulative increase in traffic noise levels is less than perceivable, Alternative B would not contribute to significant effects to sensitive receptors located in the vicinity of Hwy 99.

#### *Twin Cities Road*

Predicted cumulative traffic volumes and noise levels on Twin Cities Road (west of Hwy 99) in the year 2035 without project traffic would be the same as those described under Alternative A; refer to **Section 4.15.3**. The estimated ambient noise level in the vicinity of Twin Cities Road, with Alternative B traffic, would be approximately 59.4 dBA, Leq. In the cumulative year 2035, Alternative B would result in a 2.1 dBA Leq increase in the ambient noise level, which is imperceptible to human ears. Therefore, Alternative B would not contribute towards significant cumulative effects associated with traffic noise levels for sensitive receptors located along Twin Cities Road.

#### ***Vibration and Other Noise Sources***

The potential for cumulative impacts associated with vibration and other noise sources would be the same as the direct effects described in **Section 4.11**. Significant cumulative effects would not occur.

### **4.15.5 ALTERNATIVE C – RETAIL ON TWIN CITIES SITE**

Alternative C would be constructed on the same parcel of land as Alternative A; therefore, potentially cumulative actions and projects would be the same for Alternative C as that of Alternative A. Refer to **Section 4.15.2**.

### **Cumulative Effects Previously Addressed**

Cumulative effects to geology and soils, water resources, biological resources, cultural resources socioeconomic conditions, transportation, land use, noise, hazardous materials, and aesthetics as a result of Alternative C would be somewhat similar to those of Alternative A because both alternatives are of a similar size, although Alternative A is comprised of a casino/resort, whereas Alternative C is comprised

of retail and other commercial uses. Refer to **Section 4.15.3** for a detailed discussion on potential cumulative effects that could occur as a result of Alternative A. Cumulative effects under Alternative C would be similar to, but not greater than, those under Alternative A. Therefore, implementation of Alternative C would also result in minimal adverse cumulative effects to these resource areas.

**Air Quality**

**Operational Emissions**

The cumulative year 2035 operational emissions and General Conformity *de minimis* thresholds for Alternative C are similar to that of Alternative A; refer to **4.15.3**. Unmitigated emission estimates for Alternative C in the cumulative year 2035 are provided in **Table 4.15-9**. CalEEMod output files are included in **Appendix S**.

**TABLE 4.15-9**  
ALTERNATIVE C UNMITIGATED 2035 OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.24	0.49	3.72	0.03	0.34	0.34
Area	3.16	0.00	0.01	0.00	0.00	0.00
Energy	0.02	0.19	0.16	0.001	0.01	0.01
Mobile	9.18	25.04	130.46	0.63	45.79	12.69
78 Percent Mobile Reduction for CO*			-101.76			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>12.60</b>	<b>25.72</b>	<b>32.59</b>	<b>0.66</b>	<b>46.14</b>	<b>13.04</b>
De Minimis Threshold	25	25	100	N/A	100	100
Exceed Threshold	No	Yes	No	N/A	No	No
Notes: N/A = Not Applicable; levels are not applicable due to attainment status (refer to Section 3.4); *Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Source: CalEEMod, 2013						

**Carbon Monoxide Hot Spot Analysis**

Similar to Alternative A, Alternative C does not warrant a Hot Spot Analysis. No significant cumulative impacts would occur and no further analysis is needed.

**General Conformity Review**

For information about the Twin Cities site attainment status and potential for regional air quality impacts, refer to **Section 4.15.3**. With the implementation of mitigation provided in **Section 5.2**, implementation of Alternative C would not cumulatively adversely impact the region’s air quality.

**Climate Change**

The climate change analysis methodology for Alternative C is the same as Alternative A.

**Table 4.15-10** estimates Alternative C direct GHG emissions at 6,314.69 MT of CO<sub>2</sub>e per year and indirect emissions of 41,862.7 MT of CO<sub>2</sub>e per year. This estimate was calculated by amortizing construction emissions of approximately 1,501 MT of CO<sub>2</sub> over 1.5 years and adding them to operational emissions.

**TABLE 4.15-10**  
ALTERNATIVE C CONSTRUCTION AND OPERATIONAL MITIGATED GHG EMISSIONS

Direct	GHG Emissions (MT of CO <sub>2</sub> e/year)
Grading, Building, etc.	1,000.7
Stationary Sources	5,313.97
Area	0.02
Indirect	GHG Emissions (MT of CO <sub>2</sub> e)
Energy	1,769.0
Mobile	39,822.7
Waste	163.8
Water	107.1
<b>Total GHG Emissions</b>	<b>48,177.29</b>
Notes: BAU = business as usual; MT = metric tons; CO <sub>2</sub> e = carbon dioxide equivalent <sup>1</sup> Construction-related GHG emissions were amortized over the construction period to determine annual construction emissions. Source: CalEEMod, 2013	

Direct and indirect CO<sub>2</sub>e emissions have the potential to result in a significant cumulative effect to climate change. To reduce potential GHG emissions, mitigation measures are recommended in **Section 5.4** to reduce climate change impacts to a less than significant level.

The California strategies discussed under Alternative A would be the same for Alternative C.

## Socioeconomic Conditions

### *Non-Gaming Substitution Effects*

As discussed in **Section 4.7**, it is likely that Alternative C would result in certain non-gaming substitution effects. **Table 4.15-1** includes a list of anticipated developments in the vicinity of the City of Galt, and these include an approximate 65,000 sf Raley's Market to be located in the Galt Village Shopping Center. In combination with the anticipated impacts of Alternative C, the Raley's Market would increase the non-gaming substitution effects that are described in **Section 4.7**. This is a significant unavoidable impact.

## Transportation

Table 45 of **Appendix O** provides intersection LOS in 2035 under Alternative C. As indicated in the table, the following study intersections are projected to operate at unacceptable LOS under cumulative conditions:

- West Stockton Boulevard/Twin Cities Road
- East Stockton Boulevard/Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Ramps (at Mingo Road)
- Grant Line Road/East Stockton Boulevard

The intersection of Grant Line Road/East Stockton Boulevard is projected to operate at unacceptable LOS F with or without the addition of Alternative C. However, Alternative C would not increase the average control delay at the intersection by five seconds or more; thus, no significant impact would occur at this location.

Table 47 in **Appendix O** provides roadway segment LOS in 2035 under Alternative C. The following study roadway segment is projected to operate at unacceptable LOS in the cumulative condition with the addition of Alternative C traffic:

- West Stockton Boulevard – Hwy 99 SB Off-Ramp (north of Twin Cities Road) to Hwy 99 SB ramps (at Mingo Road)

Tables 50 and 51 in **Appendix O**, respectively, provide freeway mainline and ramp LOS for Alternative A under the cumulative condition.

As shown in Table 50 in **Appendix O**, with the addition of Alternative C traffic, the following freeway mainline segments are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative C traffic):

- Hwy 99 Between Ayers Lane and Walnut Avenue (NB and SB)
- Hwy 99 Between Walnut Avenue and Twin Cities Road (NB and SB)

- Hwy 99 Between Twin Cities Road and Mingo Road (NB and SB)
- Hwy 99 Between Mingo Road and Arno Road (NB and SB)
- Hwy 99 Between Arno Road and Dillard Road (NB)
- Hwy 99 Between Dillard Road and Grant Line Road (NB)
- Hwy 99 Between Grant Line Road Elk Grove Boulevard (NB)
- Hwy 99 Between Elk Grove Boulevard and Bond Road (NB)

As shown in Table 51 in **Appendix O**, with the addition of Alternative C traffic, the following freeway ramps are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative C traffic).

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (north)
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (south)
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Twin Cities Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Mingo Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

The East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road is projected to operate at unacceptable LOS with or without the addition of Alternative C. However, Alternative C would not increase the traffic density at this freeway ramp by five percent; thus no significant impact would occur at this location.

As shown in the referenced tables, project traffic will add to the background congestion at several study locations. There are study locations that will operate at unacceptable LOS as a result of Alternative C, or will operate at unacceptable LOS without the project and experience an increase in the average delay of five seconds or more or an increase in density of more than five percent with the addition of the project. Significant congestion is expected with and without the project. Fair share contributions and other mitigation for project impacts are recommended in **Section 5.8**.

### ***Transit, Bicycle, and Pedestrian Facilities***

Cumulative impacts to transit, bicycle, or pedestrian facilities would be the same or less than those associated with Alternative A. Refer to **Section 4.15.3**. No cumulative impacts are anticipated.

## **Noise**

The following identifies possible impacts from project related noise sources in the cumulative year 2035 for Alternative C, such as traffic, heating ventilation and air conditioning (HVAC) systems, parking structure and lots, and deliveries.

### ***Traffic Noise***

The primary source of noise in the area is generated by traffic in the cumulative year 2035. The level of traffic noise depends on: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of trucks in the flow of the traffic. It is not anticipated that speed in the vicinity of the Twin Cities site or the mix of trucks in the traffic would change during the operational phase; however, in the cumulative year 2035 traffic volumes would increase. Cumulative traffic conditions are described in detail in **Appendix O**.

#### ***Hwy 99***

Predicted cumulative traffic volumes and noise levels on Hwy 99 (NB and SB, between Twin Cities Road and Mingo Road) in the year 2035 without project traffic would be the same as those described under Alternative A; refer to **Section 4.15.3**. Alternative C traffic in the cumulative year 2035 would result in an increase in the ambient noise level of approximately 1.7 dBA Leq. The total cumulative increase from existing conditions would be approximately 3.6 dBA from existing conditions. As discussed in **Section 3.11**, a 3 dBA increase in noise is barely perceivable. Because the cumulative increase in traffic noise levels is only barely perceivable, Alternative C would not contribute to significant effects to sensitive receptors located in the vicinity of Hwy 99.

#### ***Twin Cities Road***

Predicted cumulative traffic volumes and noise levels on Twin Cities Road (west of Hwy 99) in the year 2035 without project traffic would be the same as those described under Alternative A; refer to **Section 4.15.3**. The estimated ambient noise level in the vicinity of Twin Cities Road, with Alternative C traffic, would be approximately 60.0 dBA, Leq. In the cumulative year 2035, Alternative C would result in a 2.3 dBA Leq increase in the ambient noise level, which is imperceptible to human ears. Therefore, Alternative C would not contribute towards significant cumulative effects associated with traffic noise levels for sensitive receptors located along Twin Cities Road.

### ***Vibration and Other Noise Sources***

The potential for cumulative impacts associated with vibration and other noise sources would be the same as the direct effects described in **Section 4.11**. Significant cumulative effects would not occur.

#### 4.15.6 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE

Potentially cumulative actions and projects are identified in **Section 4.15**. The effects of the Alternative D in conjunction with the cumulative setting discussed in **Section 4.15.2** are presented below. Effects are described for each of the subject areas of the environment described in other portions of this EIS.

##### **Geology and Soils**

Cumulative effects of Alternative D on geology and soils will be similar to those described under Alternative A in **Section 4.15.3**. Therefore, implementation of Alternative D would not result in significant cumulative effects to geology or soils.

##### **Water Resources**

###### ***Surface Water and Flooding***

As described in **Section 4.3** and detailed in **Appendix J**, due to the added impervious surfaces resulting in more runoff, a stormwater detention basin and flood offset basin are included in the project design for Alternative D on the Historic Rancheria site. The stormwater detention basin is designed to hold 6 acre-feet. The detention basin will discharge to an existing drainage channel along the southern edge of the property; however, the channel would need to be improved in order to convey the 100 year storm event. The flood offset basin for Alternative D is 122-acre-feet and outflow from the basin would be pumped either into the Cosumnes River (Option 1) or to the drainage channel along the Green Road (Option 2) (**Appendix J**). A description of the hydrologic parameters of the two pumping options is discussed in **Appendix J**. Given the project design of Alternative D, minimal impacts related to flooding would occur. Therefore, implementation of Alternative D would not result in significant cumulative effects to stormwater and flooding.

###### ***Water Quality***

Cumulative effects of Alternative D on water quality will be similar to those described under Alternative A in **Section 4.15.3**. With the implementation of measures identified in **Section 5.2**, Alternative D would not result in adverse cumulative effects on water quality.

###### ***Groundwater***

As stated in **Section 3.3**, the Historic Rancheria site is located in the same groundwater basin and subbasin as the Twin Cities site. There does not appear to be localized groundwater overdraft in the vicinity of the site. Cumulative groundwater impacts would be similar to those described under Alternative A in **Section 4.15.3**. Based on the short term availability of groundwater for existing uses and planned development, and the requirement for future groundwater management activities, coupled with the mitigation specified in **Section 5.3**, cumulative impacts to groundwater would not be substantial.

### ***Groundwater Quality***

Wastewater generated by buildout of the County General Plan, including the future developments discussed in **Section 4.15.2**, and Alternative D, would be treated and disposed of on-site or through connection to the County municipal sewer system. The Historic Rancheria site is located far from any centralized wastewater system and existing municipal wastewater connections are unavailable. As discussed in **Section 2.5.2**, wastewater treatment and disposal for the Historic Rancheria site would be provided by the development of an on-site WWTP and a treated effluent discharge point to the Cosumnes River. As discussed in **Section 2.5.2**, the proposed WWTP would meet the USEPA wastewater treatment criteria and would not adversely impact surface water or groundwater quality. Therefore, Alternative D, in combination with other projects in the region, would not result in significant adverse cumulative effects to groundwater quality.

### ***Air Quality***

The air quality analysis for Alternative D would be the same as Alternative A, because both alternatives have the same land use within the same air basin.

### ***Climate Change***

The climate change analysis for Alternative D would be the same as Alternative A, because both alternatives have the same land and are located in California.

### ***Biological Resources***

Cumulative effects to biological resources would occur if Alternative D, in conjunction with buildout of the County General Plan, including the projects listed within **Section 4.15.2**, would result in a significant effect to federally-listed species, contribute to a reduction in the number of a listed species that would affect the species long term sustainability, cause development that permanently disturbs a wildlife corridor, results in an effect to sensitive habitat that is of regional significance, or results in a conflict with regional conservation goals.

### ***Wildlife and Habitats***

As identified in **Section 4.5**, the majority of the impacts from Alternative D are on grassland, historic stock ponds, rural/developed areas, and riparian areas. These habitats provide limited resources for wildlife, are primarily inhabited by animal species accustomed to human disturbances, and are not considered sensitive habitats. Most of the habitat disturbed through the development of Alternative D would occur on grassland habitats. The Cosumnes River is the only aquatic habitat type that occurs in and along the Historic Rancheria site. However, no work would occur within the river or its riparian corridor. As disruption of a small amount of grassland habitat would not result in a significant effect to biological resources. Other projects in the region would comply with local, state, and federal laws that

protect biological habitat and species. No significant cumulative adverse effects to wildlife and habitat would occur.

### ***Federally-Listed Species***

As discussed in **Section 3.5**, four federally-listed wildlife species have the potential to occur on the Historic Rancheria site. Mitigation identified in **Section 5.5** includes measures that would avoid or minimize impacts to federally-listed species. Similarly, all other projects in the region are required to comply with the Endangered Species Act and avoid or minimize effects to protected species. Therefore, after mitigation, implementation of Alternative D would not contribute to adverse cumulative effects to federally-listed species.

### ***Migratory Birds***

Cumulative effects of Alternative D on migratory birds will be similar to those described under Alternative A in **Section 4.15.3**. Therefore, with implementation of mitigation measures provided in **Section 5.5**, Alternative D would not result in significant cumulative effects to migratory birds.

### ***Wetlands and/or Waters of the U.S.***

As discussed in **Section 4.5**, implementation of Alternative D, after mitigation, would not result in adverse effects to waters of the U.S. Project design ensures that Alternative D would avoid wetlands and waterways within the Historic Rancheria site to the extent possible. Indirect effects to wetlands and waterways would be avoided by the implementation of project features designed to minimize impacts and provide buffers to wetlands, control stormwater and wastewater discharges, and protect the quality of runoff water through conditions of the NPDES permit. Other cumulative projects would likewise avoid or mitigate for impacts to wetlands and Waters of the U.S. in compliance with Section 404 of the Clean Water Act. Therefore, with the implementation of the mitigation measures in **Section 5.5**, Alternative D would not contribute to adverse cumulative effects to wetlands and waters of the U.S.

### **Cultural Resources**

As described in **Section 3.6**, an archaeological investigation of the Historic Rancheria APE (**Appendix M**) revealed two previously unrecorded historic properties within the Historic Rancheria site. Given the presence of the identified historic properties within the proposed development area, there is the potential for adverse effects to National Register-eligible properties as a result of Alternative D. Alternative D may also affect previously unknown buried archaeological resources. As discussed in **Section 4.6**, direct effects to unknown cultural resources associated with Alternative D would be reduced to a minimal level with the implementation of mitigation measures specified in **Section 5.6**. Other projects in the region would be required to follow federal, state, and local regulations regarding cultural resources and inadvertent discoveries of cultural resources. Therefore, with the implementation of the mitigation measures outlined in **Section 5.6**, Alternative D, in addition to other projects in the region, would not result in adverse cumulative effects to cultural resources.

## Socioeconomic Conditions

Like Alternative A, Alternative D would introduce new economic activity in the counties of Sacramento and San Joaquin. Alternative D's specific potential cumulative effects would be similar to those of Alternative A in the two-county region. See **Section 4.7** and **Section 4.15.3** for additional information. Alternative D would not contribute to substantial adverse socioeconomic effects.

## Transportation

Table 58 in **Appendix O** provides intersection LOS in 2035 under Alternative D. As indicated in the table, the following study intersections are projected to operate at unacceptable LOS under cumulative conditions.

- Promenade Parkway/Kammerer Road
- Grant Line Road/E. Stockton Boulevard
- Wilton Road/Green Road
- Grant Line Road/Wilton Road
- Wilton Road/Cosumnes Road
- Green Road/Project Driveway 1
- Green Road/Project Driveway 2

Table 60 in **Appendix O** provides roadway segment LOS in 2035 under Alternative D. As shown in the table, the following study roadway segments are projected to operate at unacceptable LOS in the cumulative condition with the addition of Alternative D traffic.

- Grant Line Road – Hwy 99 to East Stockton Boulevard/Survey Road
- Wilton Road – Grant Line Road to Green Road
- Green Road – Wilton Road to project access driveways

Tables 63 and 64 in **Appendix O**, respectively, provide freeway mainline and ramp LOS for Alternative D under the cumulative condition.

As shown in Table 63 in **Appendix O**, with the addition of Alternative D traffic, the following freeway mainline segments are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative D traffic).

- Hwy 99 Between Ayers Lane and Walnut Avenue (NB and SB)
- Hwy 99 Between Walnut Avenue and Twin Cities Road (NB and SB)
- Hwy 99 Between Twin Cities Road and Mingo Road (NB and SB)
- Hwy 99 Between Mingo Road and Arno Road (NB and SB)
- Hwy 99 Between Arno Road and Dillard Road (NB)

- Hwy 99 Between Dillard Road and Grant Line Road (NB)
- Hwy 99 Between Grant Line Road Elk Grove Boulevard (NB)
- Hwy 99 Between Elk Grove Boulevard and Bond Road (NB)

As shown in Table 64 in **Appendix O**, with the addition of Alternative D traffic, the following freeway ramps are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative D traffic).

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (north)
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (south)
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Twin Cities Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Mingo Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

It should be noted that the mainline segment of Hwy 99 between Dillard Road and Grant Line Road (NB), as well as the following freeway ramps: West Stockton Boulevard/Hwy 99 SB Off- and On-Ramps at Mingo Road and East Stockton Boulevard/Hwy 99 NB Off-Ramp at Mingo Road, would operate at unacceptable levels of service with or without the project; however, the traffic density at these freeway mainlines and ramps would not increase by more than five percent. Therefore, no significant impacts would occur at these locations.

As shown in the referenced tables, project traffic will add to the background congestion of the freeway mainline and ramps. There are study locations that will operate at unacceptable LOS as a result of Alternative D, or will operate at unacceptable LOS without the project and experience an increase in delay by 5 seconds or more and V/C ratio of 0.05 or more (intersections and roadway segments), or an increase in density of more than five percent (mainline segments and ramps) with the addition of the project. Significant congestion is expected with and without the project. Fair share contributions and other mitigation for project impacts are recommended in **Section 5.8**.

### ***Transit, Bicycle, and Pedestrian Facilities***

Because sufficient parking would be available on-site and sidewalk and bicycle facilities do not provide direct access to the Historic Rancheria site, and the relative proximity of the Hwy 99 to the Historic Rancheria site, no significant cumulative effects would occur to pedestrian or bicycle facilities as a result of Alternative D. No current plans exist to service Alternative D with public transit. No cumulative impacts to transit are anticipated.

## **Land Use**

Cumulative effects of Alternative D on land use will be similar to those described under Alternative A in **Section 4.15.3**; however, only County planning documents are applicable to the Historic Rancheria site. With the implementation of air quality, noise, traffic, and aesthetic mitigation measures included in **Section 5.0**, Alternative D would not conflict with neighboring land uses; therefore, it would not result in adverse cumulative effects to land use planning.

## ***Agriculture***

The FPPA is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. The Historic Rancheria site is zoned primarily Agricultural-Residential (1-10 ac/du) and Agriculture Cropland under the County General Plan. Land use in the vicinity of the Historic Rancheria is zoned Agricultural Residential (1-10 ac/du) and General agriculture (20-ac). However, the Historic Rancheria is not currently used for agriculture and the fields are no longer irrigated. Development of Alternative D on the Historic Rancheria site would not preclude the use of surrounding lands for agricultural purposes. Therefore, implementation of Alternative D would not contribute to significant cumulative adverse effects to agricultural lands.

## **Public Services**

### ***Water Supply***

As discussed in **Section 3.10**, the Historic Rancheria site is located far from any centralized water system and existing municipal water connections are unavailable. The nearest municipal water system is the Elk Grove Water District (EGWD) and Sacramento County Water Agency (SCWA), located approximately 2.4 miles west of the Historic Rancheria site. However, water system expansions to the Historic Rancheria site and vicinity are not currently a part of SCWA Water Supply Master Plan (SCWA, 2005). Therefore, water would be supplied by an on-site system consisting of a new groundwater well and aboveground storage tank. No municipal water systems would be affected by Alternative D as no connections are proposed. Therefore, implementation of Alternative D would have no cumulative adverse effects on public water supply services.

### ***Wastewater***

The Historic Rancheria site is located far from any centralized wastewater system and existing municipal wastewater connections are unavailable. As described in **Section 2.5.2** and detailed in **Appendix I**, wastewater generated by Alternative D would be treated at a newly developed on-site WWTP and discharged to the Cosumnes River pursuant to the provisions of an NPDES permit issued by the USEPA. No municipal wastewater systems would be affected by Alternative D as no connections are proposed. Therefore, implementation of Alternative D would have no cumulative adverse effects on public wastewater services.

***Solid Waste***

The Historic Rancheria site is served by the same landfill as the Twin Cities site. Thus, the cumulative effects to solid waste services under Alternative D are similar to those described for Alternative A in **Section 4.15.3**. Since capacity at Kiefer Landfill is available for cumulative growth including Alternative D, no significant cumulative effects to solid waste services would occur.

***Law Enforcement***

Cumulative effects of Alternative D on law enforcement would be similar to those described under Alternative A in **Section 4.15.3**; however, GPD law enforcement services are not applicable to the Historic Rancheria site. With implementation of the on-site security measures and the conditions of a service agreement between the Tribe and the County, as discussed in **Section 5.10**, payments by the Tribe would compensate the County for costs of impacts associated with increased law enforcement services at the Historic Rancheria site. Therefore, with mitigation, Alternative D would result in a less than significant cumulative effect on public law enforcement services.

***Fire Protection and Emergency Medical Services***

Cumulative effects of Alternative D on fire protection and emergency medical services will be similar to those described under Alternative A in **Section 4.15.3**. Therefore, with implementation of mitigation measures provided in **Section 5.10** for fire and emergency medical services, Alternative D would not result in a significant cumulative effect to these resources.

***Electricity, Natural Gas, and Telecommunications***

Individual projects, including all of the projects listed within **Section 4.15.2**, would be responsible for paying development or user fees to receive electrical, natural gas, or telecommunications services. As such, the Tribe would pay a fair share of the upgrades needed to avoid affecting the service of existing customers and any infrastructure necessary to provide service to Alternative D. Both SMUD and PG&E are expected to have the capacity to provide service to the Historic Rancheria site (**Section 4.10.1**). With mitigation provided in **Section 5.10.5**, implementation of Alternative D would not cause significant cumulative effects to energy or telecommunications providers.

**Noise*****Traffic Noise******Green Road***

As described in the TIS (**Appendix O**), predicted cumulative traffic volumes on Green Road in the year 2035 without project traffic would be 6,467 vehicles per day. The ambient noise level in the vicinity of Green Road, with increased cumulative traffic, would be approximately 60.6 dBA, Leq. In the cumulative year 2035, in the vicinity of Green Road, Alternative D would result in an increase of 4.5 dBA Leq over current conditions. While this is a perceptible difference, the cumulative noise level would be

60.6 dBA, which is less than the federal noise abatement criteria (NAC) of 67 dBA for residential sensitive receptors, used by the Federal Highway Administration (FHWA) (**Section 3.11**). Therefore, Alternative D would not cause significant cumulative effects associated with traffic noise levels.

### ***Vibration and Other Noise Sources***

The potential for cumulative impacts associated with vibration and other noise sources would be the same as the direct effects described in **Section 4.11**. Significant cumulative effects would not occur.

### **Hazardous Materials**

Cumulative hazardous materials effects of Alternative D would be similar to those described under Alternative A in **Section 4.15.3**. Therefore, with the implementation of mitigation measures outlined in **Section 5.12**, Alternative D, in combination with other projects, would not result in significant cumulative effects associated with hazardous materials.

### **Aesthetics**

Screening features would be integrated into the design of the alternatives and landscaping would be used to enhance the visual character of the facilities and integrate natural elements, as discussed in **Section 4.13**. While the shift from rural development to commercial developments is inconsistent with County land use plans, the development would follow applicable design, landscaping, sign, and lighting ordinances. With the mitigation measures included in **Section 5.13**, the development of Alternative D would not result in a direct impact to aesthetics. Other projects in the vicinity of the Historic Rancheria site would be required to conform to County land use plans and ordinances; therefore, Alternative D would not cause an adverse cumulative impact to aesthetics.

### **4.15.7 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE**

Alternative E would be constructed on the same parcel of land as Alternative D; therefore, potentially cumulative actions and projects would be the same for Alternative E as that of Alternative D. Refer to **Section 4.15.6** and **Section 4.15.2**.

### **Cumulative Effects Previously Addressed**

Cumulative effects to geology and soils, water resources, biological resources, cultural resources socioeconomic conditions, transportation, land use, noise, hazardous materials, and aesthetics as a result of Alternative E would be similar to those of Alternative D. Refer to **Section 4.15.6** for a detailed discussion on potential cumulative effects that could occur as a result of Alternative D. Cumulative effects under Alternative E would be slightly less than those under Alternative D due to the reduced size of development. Therefore, implementation of Alternative E would also result in minimal adverse cumulative effects to these resource areas. Other resource areas are addressed in detail below.

## **Air Quality**

The air quality analysis for Alternative E would be the same as Alternative B, because both alternatives have the same land use within the same air basin.

## **Climate Change**

The climate change analysis for Alternative E would be the same as Alternative B, because both alternative have the same land and are located in California.

## **Transportation**

Table 71 in **Appendix O** provides intersection LOS in 2035 under Alternative E. As indicated in the table, the following study intersections are projected to operate at unacceptable LOS under cumulative conditions.

- Promenade Parkway/Kammerer Road
- Grant Line Road/E. Stockton Boulevard
- Wilton Road/Green Road
- Grant Line Road/Wilton Road
- Wilton Road/Cosumnes Road
- Green Road/Project Driveway 1
- Green Road/Project Driveway 2

Table 73 in **Appendix O** provides roadway segment LOS in 2035 under Alternative E. As shown in the table, the following study roadway segments are projected to operate at unacceptable LOS in the cumulative condition with the addition of Alternative E traffic.

- Grant Line Road – Hwy 99 to E. Stockton Boulevard/Survey Road
- Wilton Road – Grant Line Road to Green Road
- Green Road – Wilton Road to project access driveways

Tables 76 and 77 in **Appendix O**, respectively, provide freeway mainline and ramp LOS for Alternative E under the cumulative condition.

As shown in Table 76 in **Appendix O**, with the addition of Alternative E traffic, the following freeway mainline segments are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative E traffic):

- Hwy 99 Between Ayers Lane and Walnut Avenue (NB and SB)
- Hwy 99 Between Walnut Avenue and Twin Cities Road (NB and SB)
- Hwy 99 Between Twin Cities Road and Mingo Road (NB and SB)

- Hwy 99 Between Mingo Road and Arno Road (NB and SB)
- Hwy 99 Between Arno Road and Dillard Road (NB)
- Hwy 99 Between Dillard Road and Grant Line Road (NB)
- Hwy 99 Between Grant Line Road Elk Grove Boulevard (NB)
- Hwy 99 Between Elk Grove Boulevard and Bond Road (NB)

As shown in Table 77 in **Appendix O**, with the addition of Alternative E traffic, the following freeway ramps are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative E traffic):

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (north)
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (south)
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Twin Cities Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Mingo Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Mingo Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Mingo Road

The mainline segments of Hwy 99 between Dillard Road and Elk Grove Boulevard (NB), as well as the following freeway ramps: West Stockton Boulevard/Hwy 99 SB Off- and On-Ramps at Mingo Road and East Stockton Boulevard/Hwy 99 NB Off- and On-Ramps at Mingo Road, would operate at unacceptable levels of service with or without the project; however, the traffic density at these freeway mainlines and ramps would not increase by more than five percent. Therefore, no significant impacts would occur at these locations.

As shown in the referenced tables, project traffic will add to the background congestion of the study locations. There are study locations that will operate at unacceptable LOS as a result of Alternative E, or will operate at unacceptable LOS without the project and experience an increase in delay by 5 seconds or more and V/C ratio of 0.05 or more (intersections and roadway segments), or an increase in density of more than five percent (5%) with the addition of the project. Significant congestion is expected with and without the project. Fair share contributions and other mitigation for project impacts are recommended in **Section 5.8**.

### ***Transit, Bicycle, and Pedestrian Facilities***

Cumulative impacts to transit, bicycle, or pedestrian facilities would be the same or less than those associated with Alternative D. Refer to **Section 4.15.6**. No cumulative impacts are anticipated.

## **Noise**

### ***Traffic Noise***

#### ***Green Road***

Predicted cumulative traffic volumes and noise levels on Green Road in the year 2035 without project traffic would be the same as those described under Alternative D; refer to **Section 4.15.6**. The estimated ambient noise level in the vicinity of Green Road, with Alternative E traffic, would be approximately 60.0 dBA, Leq. In the cumulative year 2035, Alternative E would result in a 3.6 dBA Leq increase in the ambient noise level, which is barely perceptible to human ears. Therefore, Alternative E would not cause significant cumulative effects.

### ***Vibration and Other Noise Sources***

The potential for cumulative impacts associated with vibration and other noise sources would be the same as the direct effects described in **Section 4.11**. Significant cumulative effects would not occur.

## **4.15.8 ALTERNATIVE F – CASINO RESORT AT MALL SITE**

Potentially cumulative actions and projects are identified in **Section 4.15.2**. The effects of the Alternative F in conjunction with the cumulative setting discussed in **Section 4.15.2** are presented below. Effects are described for each of the subject areas of the environment addressed in other portions of this EIS.

## **Geology and Soils**

Cumulative effects of Alternative F on geology and soils will be similar to those described under Alternative A in **Section 4.15.3**. Therefore, implementation of Alternative F would not result in significant cumulative effects to geology or soils.

## **Water Resources**

### ***Surface Water and Flooding***

As described in **Section 4.3**, due to the previous development on the Mall site, an off-site detention basin for Alternative F has previously been designed and built to accommodate runoff. The proposed storm drain networks would be connected to the existing storm drain networks. The project design allows stormwater runoff to drain via gravity towards drainage swales and drain inlets that would tie into the existing storm drain network. Therefore, implementation of Alternative F would not result in significant cumulative effects to stormwater.

### ***Water Quality***

Cumulative effects of Alternative F on water quality would be similar to those described under Alternative A in **Section 4.15.3**. With the implementation of measures identified in **Section 5.2**, Alternative F would not result in adverse cumulative effects on water quality.

### ***Groundwater***

Buildout of the Elk Grove General Plan could result in cumulative effects to groundwater if the total water demand of approved projects, including the future developments discussed in **Section 4.15.2**, and Alternative F, exceeds the recharge capacity of the groundwater source. As discussed in **Section 4.3**, development of Alternative F would not require the use of on-site groundwater supplies as water would be provided pursuant to a services agreement with SCWA. As discussed in **Section 4.10**, SCWA has capacity to meet anticipated demand for domestic water use under Alternative F; however, prior to development the Tribe would enter into a service agreement with SCWA for the provision of potable water supply. Future demands on the groundwater basin by cumulative development would be subject to City and County land use authorities, as well as by the recently passed Senate Bill 1168, which requires local agencies to create groundwater management plans, and Assembly Bill 1739, which allows the state to intervene if local groups do not adequately manage groundwater resources. Based on the shortterm availability of groundwater for existing uses and planned development, and the requirement for future groundwater management activities, coupled with the mitigation specified in **Section 5.3**, cumulative impacts to groundwater would not be substantial.

### ***Groundwater Quality***

Wastewater generated by buildout of the Elk Grove General Plan, including the future developments discussed in **Section 4.15.2**, and Alternative F, would be treated and disposed of on-site or through connection to the City/County municipal sewer system. As discussed in **Section 4.10**, under Alternative F, the Tribe would obtain a service agreement with the SRCSD and the SASD to provide sewer service to the Mall site. Wastewater at the Sacramento Regional WWTP is treated and discharged via a RWQCB NPDES permit. Alternative F would not result in significant adverse cumulative effects to groundwater quality.

### ***Air Quality***

#### ***Operational Emissions***

Operation of Alternative F would be the similar as Alternative A. Emission estimates and General Conformity *de minimis* thresholds for Alternative F in the cumulative year 2035 are provided in **Table 4.15-11**. CalEEMod output files and AP-42 emission calculations are included in **Appendix S**.

#### ***Carbon Monoxide Hot Spot Analysis***

Hot Spot Analysis is conducted on intersections that after mitigation would have a level of service (LOS) of E or F (Caltrans, 2014). After the implementation of recommended mitigation for the project alternatives, no intersection would have an LOS or an increase in delay in the cumulative year 2035 that would warrant a Hot Spot Analysis (refer to **Appendix O**). No significant cumulative impacts would occur and no further analysis is needed.

**TABLE 4.15-11**  
ALTERNATIVE F UNMITIGATED 2035 OPERATIONAL EMISSIONS – DE MINIMIS THRESHOLDS

Sources	Criteria Pollutants					
	ROG	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
	tons per year					
Stationary Sources	0.29	1.3	4.18	0.19	0.36	0.36
Area	3.78	0.00	0.05	0.00	0.00	0.00
Energy	0.21	1.89	1.59	0.01	0.14	0.14
Mobile	7.89	26.15	133.09	0.69	50.19	13.90
58 Percent Mobile Reduction for CO*			-77.19			
Waste	0.00	0.00	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>8.10</b>	<b>28.04</b>	<b>57.49</b>	<b>0.70</b>	<b>50.33</b>	<b>14.04</b>
De Minimis threshold	25	25	100	N/A	100	100
Exceed Threshold	No	Yes	No	N/A	No	No
Notes: N/A = Not Applicable.; Stationary sources include boilers and emergency generator use; *Based on trip distribution through SVAB areas designated as maintenance for CO under NAAQS. Refer to Section 4.4.1, Methodology, "Federal General Conformity," for more detail. Source: CalEEMod, 2013, USEPA 1995						

### General Conformity Review

Past, present and future development projects, contribute to a regions air quality conditions on a cumulative basis; therefore by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself; result in nonattainment of the National Ambient Air Quality Standards (NAAQS). If a project's individual emissions contribute toward exceedance of the NAAQS, then the project's cumulative impact on air quality would be significant. In developing attainment designations for criteria pollutants, the EPA considers the regions past, present and future emission levels. As stated in **Section 3.4** the Mall site and vicinity is in nonattainment for ozone and PM<sub>10</sub>. Because project emissions are above the General Conformity *de minimis* thresholds for NO<sub>x</sub>, air quality in the region is has a potential to be cumulatively impacted. However, with the implementation of mitigation provided in **Section 5.4**, implementation of Alternative F would not cumulatively adversely impact the region's air quality.

### Climate Change

The climate change analysis methodology for Alternative F is the same as Alternative A.

**Table 4.15-12** estimates Alternative F direct GHG emissions at 7,782.85 MT of CO<sub>2</sub>e per year and indirect emissions of 48,232.6 MT of CO<sub>2</sub>e per year. This estimate was calculated by amortizing construction emissions of approximately 3,565 MT of CO<sub>2</sub> over 1.5 years and adding them to operational emissions

**TABLE 4.15-12**  
ALTERNATIVE F CONSTRUCTION AND OPERATIONAL MITIGATED GHG EMISSIONS

Direct	GHG Emissions (MT of CO <sub>2</sub> e/year)
Grading, Building, etc.	2,376.3
Stationary Sources	5,406.46
Area	0.09
Indirect	GHG Emissions (MT of CO <sub>2</sub> e)
Energy	4,208.2
Mobile	43,303.6
Waste	561.2
Water	159.5
<b>Total GHG Emissions</b>	<b>56,015.35</b>
Notes: BAU = business as usual; MT = metric tons; CO <sub>2</sub> e = carbon dioxide equivalent <sup>1</sup> Construction-related GHG emissions were amortized over the construction period to determine annual construction emissions. Stationary sources include boilers and emergency generator use. Source: CalEEMod, 2013, USEPA 1995	

Direct and indirect CO<sub>2</sub>e emissions have the potential to result in a significant cumulative effect to climate change. To reduce potential GHG emissions, mitigation measures are recommended in **Section 5.4** to reduce climate change impacts to a less than significant level.

The California strategies discussed under Alternative A would be the same for Alternative F.

**Biological Resources**

Cumulative effects to biological resources would occur if Alternative F, in conjunction with buildout of the Elk Grove General Plan, including the projects listed within **Section 4.15.2**, would result in a significant effect to federally-listed species, contribute to a reduction in the number of a listed species that would affect the species long term sustainability, cause development that permanently disturbs a wildlife corridor, results in an effect to sensitive habitat that is of regional significance, or results in a conflict with regional conservation goals.

**Wildlife and Habitats**

As discussed in **Section 3.5**, habitat on the Mall site is limited to ruderal/developed interspersed with nonnative grassland patches. The habitats present within the Mall site provide limited resources for wildlife, since they are likely inhabited by animal species accustomed to human disturbances. Therefore, Alternative F would not have a significant cumulative effect on wildlife or habitats.

### ***Federally-Listed Species***

As discussed in **Section 3.5**, the Mall site provides no habitat for federally-listed species. As such, Alternative F would not contribute to cumulative impacts on federally-listed species.

### ***Migratory Birds***

Cumulative effects of Alternative F on migratory birds will be similar to those described under Alternative A in **Section 4.15.3**. Therefore, with implementation of mitigation measures provided in **Section 5.5**, Alternative F would not result in significant cumulative effects to migratory birds.

### ***Wetlands and/or Waters of the U.S.***

As discussed in **Section 4.5**, implementation of Alternative F would not result in adverse effects to waters of the U.S as there are none located on the site. Alternative F would not contribute to adverse cumulative effects to waters of the U.S.

### **Cultural Resources**

As described in **Section 3.6**, an archaeological investigation of the Mall site APE (**Appendix M**) did not reveal any historic properties. Given the absence of pre-contact resources and historic properties, there will be no effects to known National Register eligible or listed properties as a result of the proposed actions of Alternative F. However, Alternative F may affect previously unknown buried archaeological resources. As discussed in **Section 4.6**, direct effects to unknown cultural resources associated with Alternative F would be reduced to a minimal level with the implementation of mitigation measures specified in **Section 5.6**. Approved projects would be required to follow federal, state, and local regulations regarding cultural resources and inadvertent discoveries of cultural resources. With the implementation of the mitigation measures outlined in **Section 5.6**, Alternative F, in combination with other projects in the region, would not result in adverse cumulative effects to cultural resources.

### **Socioeconomic Conditions**

Like Alternative A, Alternative F would introduce new economic activity in the counties of Sacramento and San Joaquin, as well as the City of Elk Grove. Alternative F's specific potential cumulative effects would be similar to those of Alternative A in the two-county region. See **Section 4.7** and **Section 4.15.3** for additional information. Alternative F would not contribute to substantial adverse socioeconomic effects.

### **Transportation**

Table 84 in **Appendix O** provides intersection LOS in 2035 under Alternative F. As indicated in the table, the following study intersections are projected to operate at unacceptable LOS under cumulative conditions.

- Hwy 99 SB Ramps/Grant Line Road
- Promenade Parkway/Kammerer Road
- Promenade Parkway/Bilby Road
- Grant Line Road/East Stockton Boulevard

Table 86 in **Appendix O** provides roadway segment LOS in 2035 under Alternative F. As shown in the table, all study roadway segments operate at acceptable LOS in the cumulative condition with the addition of Alternative F traffic.

Tables 89 and 90 in **Appendix O**, respectively, provide freeway mainline and ramp LOS for Alternative F under the cumulative condition.

As shown in Table 89 in **Appendix O**, with the addition of Alternative A traffic, the following freeway mainline segments are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative F traffic).

- Hwy 99 Between Ayers Lane and Walnut Avenue (NB and SB)
- Hwy 99 Between Walnut Avenue and Twin Cities Road (NB and SB)
- Hwy 99 Between Twin Cities Road and Mingo Road (NB and SB)
- Hwy 99 Between Mingo Road and Arno Road (NB and SB)
- Hwy 99 Between Arno Road and Dillard Road (NB)
- Hwy 99 Between Dillard Road and Grant Line Road (NB)
- Hwy 99 Between Grant Line Road Elk Grove Boulevard (NB)
- Hwy 99 Between Elk Grove Boulevard and Bond Road (NB)

As shown in Table 90 in **Appendix O**, with the addition of Alternative F traffic, the following freeway ramps are projected to operate at an unacceptable LOS (note that most segments would also operate at unacceptable LOS even without Alternative F traffic).

- West Stockton Boulevard/Hwy 99 SB Off-Ramp at Twin Cities Road
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (north)
- West Stockton Boulevard/Hwy 99 SB On-Ramp at Twin Cities Road (south)
- East Stockton Boulevard/Hwy 99 NB Off-Ramp at Twin Cities Road
- East Stockton Boulevard/Hwy 99 NB On-Ramp at Twin Cities Road

As shown in the referenced tables, project traffic will add to the background congestion of the freeway mainline and ramps. There are study locations that will operate at unacceptable LOS as a result of Alternative F, or will operate at unacceptable LOS without the project and experience an increase in delay by 5 seconds or more and V/C ratio of 0.05 or more (intersections and roadway segments), or an increase in density of more than five percent (mainline segments and ramps) with the addition of the project.

Significant congestion is expected with and without the project. Fair share contributions and other mitigation for project impacts are recommended in **Section 5.8**.

### ***Transit, Bicycle, and Pedestrian Facilities***

Because there are existing sidewalks and bike lanes near the Mall site and Alternative F is not anticipated to inhibit access to or eliminate any existing bicycle and/or pedestrian facilities, no significant cumulative effects would occur as a result of Alternative F. Under Alternative F, the Mall site may be serviced with public transit. Therefore, no cumulative impacts to transit are anticipated.

### **Land Use**

Development in Elk Grove is guided by the General Plan, applicable Specific Plans, the Zoning Ordinances, and Redevelopment Plans. Planned development projects within Elk Grove are consistent with these documents and policies, which prevent disorderly growth or incompatible land uses. While Alternative F would not be subject to local land use policies, as discussed in **Section 4.9**, the Tribe has agreed to work cooperatively with local governments on matters relating to land use and consistency with local codes. Alternative F would not disrupt neighboring land uses; prohibit access to neighboring parcels, or otherwise conflict with neighboring land uses. Therefore, Alternative F would not result in adverse cumulative effects to land use planning.

### ***Agriculture***

The Mall site is not currently being used for agricultural production, and it is not eligible for protection under the FPPA. Additionally, the Mall site is not zoned for agriculture. Therefore, implementation of Alternative F would not contribute to significant cumulative effects on agricultural resources.

### **Public Services**

#### ***Water Supply***

A significant cumulative effect would occur to water supply distribution facilities as a result of the required expansion to provide service to Alternative F, in conjunction with buildout of the Elk Grove General Plan, including the projects listed within **Section 4.15.2**. As discussed in **Section 4.10**, Alternative F would be supplied water through connections to SCWA infrastructure, which is partially constructed on the Mall site. As discussed in **Section 2.7.2**, the Tribe would pay water capital connection charges and monthly service fees. Projects approved for connection to the municipal water system would contribute to the extension of the water distribution system to their respective sites. As discussed in **Section 4.10**, SCWA has capacity to meet anticipated demand for domestic water use under Alternative F; however, prior to development the Tribe would enter into a service agreement with SCWA for water. Mitigation measures are provided in **Section 5.10** to ensure that an adequate water supply is available for the operation of Alternative F, and for the necessary fire flows. Therefore, with mitigation, implementation of Alternative F would not result in cumulative adverse effects to public water services.

***Wastewater***

Under Alternative F, the Tribe would obtain a services agreement with the SRCSD and the SASD to provide wastewater service to the Mall site. Currently, there are partially completed connections to SASD and SRCSD infrastructure located on and in the immediate vicinity of the Mall Site. The completion of these connections to the existing sewer system would occur under Alternative F and wastewater would be conveyed to the SRCSD WWTP.

As discussed in **Section 3.10**, the Sacramento Regional WWTP has a permitted capacity of 181 MGD ADWF. The plant currently has an available capacity of about 40 MGD (**Appendix I**). The 40 MGD of current available capacity at the Sacramento Regional WWTP would accommodate the wastewater demands of Alternative F as well as future developments discussed in **Section 4.15.2**. With implementation of the mitigation in **Section 5.10**, Alternative F would not result in adverse cumulative effects to wastewater services.

***Solid Waste***

The Mall site may be served by the same landfill as the Twin Cities site, or by a number of other landfills that contract with commercial waste haulers. Thus, the cumulative effects to solid waste services under Alternative F are similar to those described for Alternative A in **Section 4.15.3**. Since capacity at Kiefer Landfill is available for cumulative growth including Alternative F, no significant cumulative effects to solid waste services would occur.

***Law Enforcement***

New development, including projects listed within **Section 4.15.2**, would fund the County and Elk Grove services including law enforcement through development fees and property tax. Cumulative effects of Alternative F on land use would be similar to those described under Alternative A in **Section 4.15.3**; however, Elk Grove Police Department (EGPD) instead of GPD, is applicable to the Mall site. With implementation of the on-site security measures and the conditions of a service agreement between the Tribe and the City of Elk Grove, as discussed in **Section 5.10**, payments by the Tribe would compensate the City of Elk Grove for costs of impacts associated with increased law enforcement services at the Mall site. Therefore, with mitigation, Alternative F would result in a less than significant cumulative effect on public law enforcement services.

***Fire Protection and Emergency Medical Services***

New development, including projects listed within **Section 4.15.2**, would be required to fund Elk Grove and/or the County services, including fire protection and emergency medical response through development fees and property tax. Emergency medical costs are paid primarily by the individual requiring service. Due to the potential for an increase in calls for fire protection services during operation of Alternative F and the extended hours of operation at the Mall site, a potentially significant impact to the CCSD Fire Department could occur. With implementation of the conditions of the service agreement

between the Tribe and the CCSF Fire Department, as discussed in **Section 5.10**, payments by the Tribe would compensate the CCSF Fire Department for costs of impacts associated with increased fire protection services at the Mall site. Therefore, with implementation of mitigation, Alternative F would result in a less than significant cumulative effect on public fire protection services

The CCSF Fire Department also provides first responder emergency medical service through paramedic staffing on ambulances and engines. The nearest emergency room is located at Methodist Hospital of Sacramento, approximately 5.7 miles north of the Mall site. On average, Methodist Hospital has extra bed capacity. Mitigation in **Section 5.10** includes a measure for the Tribe to enter into a service agreement to reimburse CCSF Fire Department for additional demands created by the project alternatives. With this mitigation, Alternative F would not result in a significant cumulative effect on emergency medical services.

### ***Electricity, Natural Gas, and Telecommunications***

Individual projects, including all of the projects listed within **Section 4.15.2**, would be responsible for paying development or user fees to receive electrical, natural gas, or telecommunications services. Both SMUD and PG&E are expected to have the capacity to provide service to the Mall site (**Section 4.10**). Furthermore, the Mall site contains previously installed SMUD and PG&E connections on or around the Mall site. Therefore, Alternative F would not cause significant cumulative effects to energy or telecommunications providers.

### **Noise**

The following identifies possible impacts from project related noise sources in the cumulative year 2035 for Alternative F, such as traffic, heating ventilation and air conditioning (HVAC) systems, parking structure and lots, and deliveries.

#### ***Traffic Noise***

The primary source of noise in the area is generated by traffic in the cumulative year 2035. The level of traffic noise depends on: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of trucks in the flow of the traffic. It is not anticipated that speed in the vicinity of the Mall site or the mix of trucks in the traffic would change during the operational phase; however, in the cumulative year 2035 traffic volumes would increase. Cumulative traffic conditions are described in detail in **Appendix O**.

#### ***Hwy 99***

As described in the TIS (**Appendix O**), predicted cumulative traffic volumes on Hwy 99 (NB and SB, between Elk Grove Boulevard and Grant Line Road) in the year 2035 without project traffic would be 6,350 vehicles per hour. The ambient noise level in the vicinity of Hwy 99 with increased cumulative traffic would be approximately 53.9 dBA, Leq. This is an increase of less than 1.5 dBA from existing conditions (52.4 dBA; refer to **Section 3.11**). Alternative F traffic in the cumulative year 2035 would be

equal to the 2035 no project baseline traffic plus the trips generated by the project that would travel along Hwy 99, resulting in an increase in the ambient noise level of approximately 2.1 dBA Leq over current conditions. As discussed in **Section 3.11**, a 3 dBA increase in noise is barely perceivable. Because the cumulative increase in traffic noise levels is less than perceivable, Alternative F would not contribute to significant effects to sensitive receptors located in the vicinity of Hwy 99.

#### *Promenade Parkway*

As described in the TIS (**Appendix O**), traffic volumes without project traffic on Promenade Parkway (between Bilby Road and Kyler Road) in the year 2035 without project traffic would be 22,460 vehicles per day. The estimated ambient noise level in the vicinity of Promenade Parkway, with increased cumulative traffic would be approximately 55.2 dBA, Leq. In the cumulative year 2035, Alternative F would result in a 2.8 dBA Leq increase in the ambient noise level over current conditions, which is imperceptible to human ears. Therefore, Alternative F would not contribute towards significant cumulative effects associated with traffic noise levels for sensitive receptors located along Promenade Parkway.

#### ***Vibration and Other Noise Sources***

The potential for cumulative impacts associated with vibration and other noise sources would be the same as the direct effects described in **Section 4.11**. Significant cumulative effects would not occur.

#### **Hazardous Materials**

Cumulative hazardous materials effects of Alternative F will be similar to those described under Alternative A in **Section 4.15.3**. Therefore, with the implementation of mitigation measures outlined in **Section 5.12**, Alternative F, in combination with other projects, would not result in significant cumulative effects associated with hazardous materials.

#### **Aesthetics**

Cumulative development that takes place would be consistent with local land use regulations, including associated design guidelines. Cumulative effects would include a shift from open, undeveloped lots to views of developed areas, as well as an increase in the density of urban uses within Elk Grove. However, the development of Alternative F would be generally consistent with the visual goals of Elk Grove land use regulations. Furthermore, the Mall site is partially developed and substantial development is present to the east of the Mall site. Therefore, with the implementation of mitigation measures outlined in **Section 5.13**, Alternative F would not result in adverse cumulative impacts to aesthetic resources.

#### **4.15.9 ALTERNATIVE G – No ACTION**

Under Alternative F, the no action alternative, development of the Twin Cities and Historic Rancheria, sites are not reasonably foreseeable in the short-term, and current land uses would continue. None of the adverse or beneficial effects identified for Alternatives A through E are anticipated to occur. Therefore, Alternative G would not result in significant cumulative effects at these two sites. However, the Elk Grove Mall site would likely be developed in the near term as commercial/retail spaces. Cumulative effects for Alternative G at the Elk Grove Mall site would be comparable to those under Alternative F as the developments would be similar in nature.