

CHAPTER 3.0

RESPONSES TO COMMENTS

RESPONSE TO COMMENT LETTER #1 – GOVERNOR’S OFFICE

- 1-1 Commenter’s footnote states that the temporary overflow parking lot on fee land south of Athens Avenue is subject to CEQA. It is acknowledged that each of the offsite improvements identified in the Draft TEIR, including the proposed alterations to this parking lot and proposed traffic mitigation measures at offsite locations, are subject to CEQA. Each offsite improvement will be individually evaluated by the appropriate jurisdiction for CEQA compliance, and the Lead Agency will determine the appropriate level of CEQA review and documentation. Note that an incorrect figure reference on page 3-26 of the Draft TEIR has been corrected; the figure showing improvements to the temporary overflow parking lot is **Figure 3-11**, rather than **Figure 3-10**.
- 1-2 The visual impact analysis in the Draft TEIR concludes that although the proposed project would be visible from a variety of locations, there is a less than significant visual impact. However, for the residents along the southern edge of the Lincoln Crossing development, the proposed casino expansion would impact the view to the south. Accordingly, the level of significance of **Impact 8.1** in the Draft TEIR has been revised as follows:

“IMPACT 8.1:	The proposed project would result in changed views from local roads, residential areas, and public buildings, and contribute to the urbanization of the area.
SIGNIFICANCE:	<u>Potentially Significant for some Lincoln Crossing residents</u>
MITIGATION:	<u>None Warranted Mitigation Measure 8.1</u>
<u>RESIDUAL SIGNIFICANCE:</u>	<u>Less than Significant</u>

“...A summary of the visual impact analysis is presented in **Table 8-1**. Sensitive viewers in Viewshed A include residents of the Lincoln Crossing development as well as southbound commuter traffic on SR 65 and Industrial Avenue. As shown in **Figure 8-5 (photo simulations B and D)**, some viewers within the Lincoln Crossing development would have a ~~low to moderate~~ to high potential for visual impacts, depending on distance and the presence of vegetation as well as utility poles and overhead lines near the observation point...”

“Although the proposed project would be visible from a variety of locations, it is not anticipated to be an intrusive or aesthetically disruptive feature on the landscape. The proposed project would constitute only a small portion of the viewshed from each direction that includes sensitive viewers, with the exception of those Lincoln Crossing residents along the southern edge of that development, who would have unimpeded views from approximately 0.85 miles away. As more of the planned and approved projects in the Sunset Industrial Area (SIA) and surrounding jurisdictions approach buildout, the prominence of the proposed project on the landscape would be diminished. Maturation of trees and other landscaping within the recently completed residential developments would also provide screening for viewers in these areas. Through conformance with applicable land use regulations and design guidelines, development of the proposed project would result in a less than significant impact for all sensitive viewers except the residents of Lincoln Crossing whose homes border the southern edge of the development. Impacts to these viewers would be potentially significant, but with implementation of **Mitigation Measure 8.1**, will be reduced to a level of less than significant.”

Mitigation Measure 8.1 has been added to the Revised Draft TEIR as follows:

Mitigation Measure 8.1: Visual screening for Lincoln Crossing residents

Mitigation Measure 8.1 applies to Impact 8.1

Trees shall be planted along the nature trail and behind homes within the Lincoln Crossing development that would experience the greatest visual impact from the proposed project. Representatives of the Tribe shall meet with the Lincoln Crossing Community Association to determine the appropriate number and types of trees. The Tribe shall either purchase the trees directly, or contribute an appropriate amount to the Community Association for the purchase of the trees. Implementation of this measure will mitigate the potentially significant visual impact for these viewers to a less than significant level.

RESPONSE TO COMMENT LETTER #2 – OFFICE OF PLANNING AND RESEARCH (STATE CLEARINGHOUSE)

2-1 Receipt of State Clearinghouse letter is acknowledged, and no response is required.

RESPONSE TO COMMENT LETTER #3 – CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION

3-1 Receipt of CALFIRE letter is acknowledged, and no response is required.

RESPONSE TO COMMENT LETTER #4 – NATIVE AMERICAN HERITAGE COMMISSION

4-1 Receipt of NAHC letter is acknowledged, and no response is required.

RESPONSE TO COMMENT LETTER #5- CALTRANS

5-1 Operational issues (including queuing) on the segment of SR 65 through downtown Lincoln represent existing deficiencies. The Thresholds of Significance recommended by Placer County relate to level of service and not queue lengths. Using these thresholds, each of the three intersections referenced by the commenter currently operates at LOS C or better during both the weekday and Saturday PM peak hour, and would continue to operate at acceptable LOS with the addition of project traffic, as stated in **Section 9.3** of the Draft TEIR. More detailed analysis of these intersections is unwarranted, given the impending construction of the regionally-significant Lincoln Bypass project, which will relieve conditions along the road segment referred to in the comment. That major roadway improvement is scheduled to begin before the end of 2008, with completion expected by 2012 – 2013 (roughly the same time frame as the proposed project), according to the Caltrans District 3 Website. Because the Lincoln Bypass represents the ultimate long-term solution to the existing operational deficiencies along SR 65 in downtown Lincoln, nothing meaningful would be gained through additional analysis of short-term conditions.

5-2 As mentioned in the response to Comment 5-1, the Thresholds of Significance recommended by Placer County relate to level of service and not queue lengths. As noted in the comment, the direct on-ramp from eastbound Twelve Bridges Drive to southbound SR 65 will be constructed as part of the roadway system improvements assumed under cumulative conditions. Thus, a long-term solution to the issue identified in the comment has already been identified.

5-3 Comment acknowledged. The suggestion for signal coordination represents a detail that will appropriately be addressed in the design process for the signal. The text of **Mitigation Measure 9.5** has been amended to specify signal coordination as follows: “Signalize the intersection. The addition of project-generated traffic causes this intersection to meet the “Peak Hour Volume” signal warrant documented in “Part 4-Highway Traffic Signals” of the California MUTCD (2006). The signal at this intersection shall be coordinated with the signal at the SR 65 Southbound Ramps/Twelve Bridges Drive intersection.”

RESPONSE TO COMMENT LETTER #6 – PLACER COUNTY AIR POLLUTION CONTROL DISTRICT (PCAPCD)

6-1 The contribution of the proposed project to a cumulative air quality impact is acknowledged on page 16-37 of the Draft TEIR:

“While the proposed project represents a small portion of cumulative emissions in Placer County, the SIA Plan EIR indicates cumulatively significant and unavoidable effects from increases in construction emissions and mobile source criteria air pollutants, primarily from vehicular sources (ESA, 1997). The proposed project would contribute to this cumulative impact.”

- 6-2 Given the magnitude of the proposed project and the variables in the timeline of construction, the exact build-out date can only be estimated. A preliminary estimated build-out date of summer 2011 was used for the air quality analysis in the Draft TEIR. More recent data provided by casino project managers now suggest a more likely buildout date of 2012, using an estimated 46-month, two-phase construction period. The first phase would likely include construction of the main casino building expansion, hotel tower, and parking garage. Plans for the second phase currently include construction of the performing arts center, ballrooms/meeting rooms and spa facilities. Information regarding the estimated construction phasing and length has been added to **Chapter 3.4** of the Revised Draft TEIR. Updated URBEMIS modeling results are included as **Appendix A** of this document, and revised estimated construction emissions are presented in **Table 3-1**, below (also included as **Table 10-6** in the Revised Draft TEIR).

**TABLE 3-1
ESTIMATED UNMITIGATED (MITIGATED) CONSTRUCTION EMISSIONS**

Source	Pollutants of Concern		
	ROG	NO _x	PM ₁₀
	pounds per day		
2008 Site Grading	9.36 (9.36) 5.02 (5.02)	75.68 (75.68) 37.84 (37.84)	291.29 (69.46) 133.24 (31.94)
2009 Building	21.69 (9.55) 72.35 (48.77)	71.50 (71.50) 22.24 (20.04)	291.07 (69.25) 4.65 (0.78)
2010 Building	21.32 (10.51) 67.66 (16.84)	24.34 (22.26) 15.65 (13.41)	1.74 (0.94) 4.33 (0.22)
2011 Building and Coating	20.94 (10.13)	22.43 (20.47)	1.67 (0.90)
2012 Paving and Coating	23.05 (7.39)	34.73 (30.88)	2.77 (1.08)
Maximum Emissions	23.05 (10.51) 72.35 (48.77)	75.68 (75.68) 37.84 (37.84)	291.29 (69.46) 133.24 (31.94)
PCAPCD CEQA Thresholds	82	82	82
Exceeds Thresholds	No (No)	No (No)	Yes (No)

Source: URBEMIS, 2007; AES, 20087

The results of the URBEMIS modeling have not changed with regard to exceedance of thresholds for criteria pollutants; thresholds for PM₁₀ would be exceeded during site grading, but the implementation of a Construction Emissions and Dust Control Plan (**Mitigation Measure 10.1**) would reduce this impact to a less than significant level.

6-3 As stated in the Air Quality analysis section of the Draft TEIR, “Operation of the proposed project would result in ROG, NO_x, and PM₁₀ emissions primarily from vehicle emissions. However, area sources such as water heating units, kitchen ovens and stoves, and air heating and cooling units would also emit ROG, NO_x, and PM₁₀” (**Chapter 10.4**). The installation of three 12 MMBtu/hr forced draft boilers, emergency generator, associated pumps, and other appliances is within the normal scope of the land uses, which were used as inputs in the 2007 URBEMIS air quality modeling program.

Emissions from such appliances have been estimated within the area source section of the URBEMIS air quality modeling program and reported under the area source heading in the output files (**Appendix H** of the Draft TEIR; revised as **Appendix A** of this document). As such, the project-related long-term air quality analysis was completed with the pertinent input values associated with the abovementioned boilers, generators, pumps, and appliances.

6-4 The trip generation rate cited in Table 29 of the TIA (**Appendix F** of the Draft TEIR) was derived from traffic counts at five northern California Indian gaming venues of various sizes (David Evans and Associates, 2001; Fehr & Peers Associates, 1999), and adjusted for peak month values and other considerations according to data from the following studies:

- Gulf Regional Planning Commission, *Mississippi Gulf Coast Transportation Management Plan for Waterfront Development*, Gulfport, MS, June, 1993.
- BRW, Inc. 2000, *St. Croix Meadows Racing Park Proposed Casino Traffic Impact Study; Hudson, Wisconsin*.
- *Trip Generation Rates for Las-Vegas Area Hotel-Casinos*, May 1992 ITE Journal.
- Box, Paul C. and William Bunte, *Gaming Casino Traffic*, March 1999 ITE Journal.
- San Diego County Department of Public Works. *Traffic Needs Assessment of Tribal Development Projects in the San Diego Region – March 2003 Update*.

The methodology and resulting trip generation rates were confirmed by an independent marketing study for a large casino project, verified by a member of the ITE technical advisory committee on casino trip generation, and approved by Caltrans District 3 (Wymer, 2003).

The trip generation rate resulting from these studies was determined to be 39.43 peak month weekday trips per thousand square feet (Ksqf) of gaming floor area. The rate was discounted by 25 percent in the TIA to account for longer patron stays at the expanded facilities, resulting in a discounted rate of 29.57 trips/Ksqf applied to the entire 475,000 square foot expansion of the main structure (see Table 29 of the TIA). It is important to note that the original trip generation rate was designed to apply only to gaming floor area, rather than the entire casino facility square

footage; hence, the application of this rate to the entire main structure expansion area results in a very conservative estimate, even with the 25 percent reduction for longer patron stays.

The air quality analysis in the Draft TEIR used the undiscounted rate of 39.43 trips/Ksqf of gaming floor (as determined by the above studies) in the URBMEIS air quality modeling program for the expansion project, but further delineated specific areas by trip-generating uses. As shown in **Table 3-1** of the Draft TEIR, the expansion project would increase the actual gaming floor area by 76,500 square feet. An additional 45,000 square feet are proposed for other trip-generating uses (i.e. restaurants, lounges, etc.); however, this area was conservatively reduced by 33 percent to account for internal capture, resulting in a 29,940 square foot area that would generate additional trips. A rate of 2.06 trips per room was used for the proposed 650-room hotel, which is consistent with the above studies and the TIA. There is no daily trip generation rate listed in the TIA for the Performing Arts Center; therefore, the Institute of Transportation Engineers (ITE) rate book was consulted to determine a trip generation rate for this portion of the expansion project. A rate of 15.77 trips per Ksqf was used, based on the ITE published rates for similar uses. The performing arts center is planned at 140,000 square feet, excluding the lobby/restrooms/circulation areas, as these facilities are generally not considered trip generators.

The methodology section of **Chapter 10.4** of the Draft TIER includes information on trip generation rates used for the URBEMIS air quality modeling program for the expansion project. As shown above, the trip generation rates used in the air quality analysis are more specific than, but ultimately consistent with, the very conservative rates used in the TIA, and rates confirmed through traffic counts for other projects of similar land uses and size.

Project representatives met with the commenter to discuss the trip generation rates, customer trip length assumptions (as discussed under Comment 6-5), and cumulative analysis methodology (as discussed under Comment 6-7). Meetings with Mr. Chang were held at the PCAPCD offices on June 4 and June 11, 2008. After this consultation, it was agreed that more of the square footage of the expanded casino building could be considered as uses which generate trips. Areas such as the meeting/ballrooms and spa would potentially draw new customers, although a conservative 50 percent internal capture rate was applied to these areas. The reduction of restaurant/lounge square footage by 33 percent was maintained to account for internal capture, and 10 percent of the circulation area square footage was added to account for customers attracted by the spacious facilities. The URBEMIS air quality modeling program was re-run using a trip generating square footage of 160,690 at the rate of 39.43 daily trips per Ksqf, as detailed above. The trip generation rates for the hotel and performing arts center were maintained from the previous estimations. Results from the updated URBEMIS modeling program are summarized under the response to Comment 6-6.

- 6-5 The commenter suggests that the average customer trip length of 7.9 miles used in the Draft TEIR's URBEMIS air quality model does not accurately reflect the demographics of current casino visitors. Although this trip length is consistent with the 2002 *Auburn Rancheria Gaming & Entertainment Facility Project* EIR, which was approved by the Tribe and accepted by Placer County, more recent data indicate that a longer trip length is a reasonable assumption.

Patrons traveling from locations further away are more likely to either use the free Thunder Valley Casino shuttle service, carpool, or arrive in organized charter tour bus groups. According to casino records for the two-month period between February 11, 2008 and April 13, 2008, approximately 19 charter tour buses visit the casino on an average weekday, while an average of 27 arrive each weekend day. These buses come from the greater Bay Area (approximately 64%) and the Sacramento metropolitan area (27%), as well as a few Central Valley (3%) and other locations. The average Vehicle Occupancy Ratio (VOR) for these longer charter trips is quite high, with as many as 35 to 55 individuals per bus. This greatly reduces the total number of longer car trips to the casino.

As shown in **Table 5-1** of the Draft TEIR, approximately 200,000 residents live within the cities of Lincoln, Roseville, Rocklin, and adjacent unincorporated areas of western Placer County, including the major local residential developments of Sun City Lincoln Hills (1.3+ miles from Thunder Valley), Lincoln Crossing (0.85+ miles), Whitney Ranch (1.0+ miles), Twelve Bridges (1.0+ miles), the Stanford Ranch developments (3.5+ miles), and Sun City Roseville (5.4+ miles). As stated in **Chapter 5.1** of the Draft TEIR, Placer County experienced a 47 percent population growth rate between the years of 1996 and 2006, one of the highest growth rates in the State of California. The City of Lincoln, in particular, has experienced phenomenal growth rates with a 200 percent population increase between 2000 and 2006 (**Table 5-1**). Placer County's population growth has been accompanied by economic growth, with low unemployment rates and average incomes exceeding the State median in all industries. These potential patrons are much more likely to stop at the casino on the way to or from other destinations (e.g., between work and home), or make the short drive to Thunder Valley in single-occupant vehicles.

The average trip length of local and regional casino visitors was revised to reflect a 15-mile distance, based on known casino patron demographics and the assumptions above. This is approximately the distance between the casino and Northern Sacramento County locations such as Citrus Heights, Rio Linda, and Folsom. This trip length accounts for the large numbers of local patrons traveling within that distance, as well as visitors arriving from locations further away. Although it can be assumed that the frequent use of charter buses for longer casino-oriented trips lessens the total number of longer trips, no bus reductions were applied to the URBEMIS model to take this factor into account, resulting in a conservative estimate for mobile source emissions.

6-6 URBEMIS modeling was re-run using the updated buildout date of 2012, trip-generation rates and square footages as described under the response to Comment 6-4, and a revised customer trip length of 15 miles, all agreed upon in consultation with the commenter. This new emissions estimate finds that operational emissions would exceed the District thresholds for ROG, NO_x, and PM₁₀. By installation of the solar power array recommended in **Mitigation Measure 10.2**, emissions of NO_x and PM₁₀ would be reduced. The emission reductions from the solar array were not accounted for in the original URBEMIS modeling. Using EPA emission factors and the estimated 1.4 gigawatts per hour of electrical power generated by the solar array, emission reductions were calculated for NO_x and PM₁₀. It is estimated that use of the solar array would offset the emissions of NO_x by 20.33 lbs/day and PM₁₀ by 50.17 lbs/day. The mitigated emissions would still exceed the District’s thresholds for all three criteria pollutants.

URBEMIS modeling was conducted to predict emissions in the years following project buildout, resulting in an exceedance of ozone precursor thresholds until 2015, at which time project emissions would be below the PCAPCD’s thresholds (**Appendix A**). Emissions of PM₁₀ would continue to exceed the significance threshold. **Impact 10.3** in the Revised Draft TEIR has been modified as shown below to reflect this significant impact:

“IMPACT 10.3:	Operational emissions could result in significant quantities of ROG, NO _x , and PM ₁₀ .
SIGNIFICANCE:	<u>Potentially Significant</u> Less than Significant
MITIGATION:	<u>Mitigation Measure 10.3</u> None Warranted
<u>RESIDUAL SIGNIFICANCE:</u>	<u>Less than Significant</u>

Project operation would generate ozone precursors (NO_x and ROG) and PM₁₀ primarily from mobile sources (i.e., emissions released from vehicles arriving and departing the casino/hotel). Unmitigated operational emissions associated with the buildout of the proposed project in the year 2012 would exceed ~~be less than~~ the PCAPCD thresholds of 82 pounds per day for ROG, NO_x, and PM₁₀ (**Table 10-7**), and would ~~are~~ therefore be a less than significant impact. By incorporating an emission reduction credit from installation of the solar power array recommended as Mitigation Measure 10.2, emissions of NO_x and PM₁₀ can be reduced (by 20.33 lbs/day and 50.17 lbs/day, respectively), but would still exceed the PCAPCD threshold, as shown by the amounts in parentheses in **Table 10-7:**

**TABLE 10-7
ESTIMATED UNMITIGATED (MITIGATED) OPERATIONAL EMISSIONS (2012)**

Sources	Pollutants of Concern		
	ROG	NO _x	PM ₁₀
	pounds per day		
Area	4.57 4.23 (4.23)	7.26 6.90 (6.90)	0.02 (0.02)
Mobile	92.86 44.87 (43.96)	120.00 48.09 (46.92)	194.17 65.22 (63.64)
Total Operational Emissions (adjusted for solar array reductions)	97.43 (97.43) 49.10 (48.09)	127.26 (106.93) 54.99 (52.45)	194.19 (144.02) 65.24 (63.66)
<i>PCAPCD CEQA Threshold</i>	82	82	82
Exceeds Thresholds	Yes (Yes) No (No)	Yes (Yes) No (No)	Yes (Yes) No (No)

Source: URBEMIS 2007; AES, 2008⁷

URBEMIS modeling was conducted for annual operation of the project following the 2012 buildout year, in order to determine ongoing emission levels of ozone precursors. Projections of emission levels for these criteria air pollutants for the years 2012 through 2015 are shown in **Table 10-8**:

**TABLE 10-8
ESTIMATED MITIGATED OPERATIONAL EMISSIONS OF OZONE PRECURSORS, 2012-2015**

Sources	Ozone Precursors (pounds per day)							
	2012		2013		2014		2015	
	ROG	NO _x	ROG	NO _x	ROG	NO _x	ROG	NO _x
Area	4.57	7.26	4.57	7.26	4.57	7.26	4.57	7.26
Mobile	92.86	120.00	83.44	107.59	77.77	95.55	72.90	86.46
Total Operational Emissions (adjusted for solar array reduction)	97.43 (97.43)	127.26 (106.93)	88.01 (88.01)	114.85 (94.52)	82.34 (82.34)	102.81 (82.48)	77.47 (77.47)	93.72 (73.39)
<i>PCAPCD CEQA Threshold</i>	<u>82</u>	<u>82</u>	<u>82</u>	<u>82</u>	<u>82</u>	<u>82</u>	<u>82</u>	<u>82</u>
Exceeds Thresholds	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>No</u>

Emissions of PM₁₀ will remain essentially unchanged from 2012 levels, and will continue to exceed PCAPCD threshold levels even with adjustments for the solar array reduction. Mitigation Measure 10.3 will reduce the operational emissions of ozone precursors and PM₁₀ to a less than significant level.”

Mitigation Measure 10.3 has been added to the Revised Draft TEIR to reduce the project’s operational impact to a less than significant level:

“Mitigation Measure 10.3: Offset operational emissions of ROG, NO_x, and PM₁₀. Mitigation Measure 10.3 applies to Impact 10.3.

In addition to the environmental commitments listed under Impact 10.3, the Tribe shall fund the PCAPCD's Offsite Mitigation Program, to offset ROG and NO_x emissions that exceed the District's thresholds. The fees have been calculated in consultation with the PCAPCD, according to the annual exceedance of thresholds for ozone precursors from 2012 through 2015, by which date the project's estimated operational emissions would be below the PCAPCD thresholds for ROG and NO_x. The total amount of this contribution is \$75,634.

The Tribe shall also pay a contribution of \$42,648 to the PCAPCD's Woodstove Replacement Program to offset the exceedance of the District's PM₁₀ threshold. This program offers incentive vouchers for the replacement of wood stoves that contribute, on average, 60 grams of particulate matter per hour of operation (g/hr), with more efficient units that contribute an average of 5 g/hr, a reduction of approximately 1.45 lbs/day of PM₁₀ per stove."

The Tribe has also agreed to implement some of the relevant measures suggested by the District as a commitment to further reduce the operational air quality impact of the proposed project, as noted under the response to Comment 6-10.

- 6-7 During the meetings between the project representatives and Mr. Chang, revisions were made to the URBEMIS inputs used to estimate cumulative air quality impacts. The PCAPCD's 10 lbs/day thresholds for ROG and NO_x are applied to the first year of operation, i.e., the year during which the proposed project's operational emissions will join cumulatively with the other existing emission sources in Placer County. The cumulative threshold for PM₁₀ emissions is the same as the operational threshold (82 lbs/day), therefore impacts and mitigation from this pollutant have already been discussed under the response to Comment 6-6, above. Percentages of projected future County-wide emissions are not used for calculating significance of impacts, although they are included for a comparative reference. County-wide emissions are calculated every five years; therefore, 2015 was used as a reasonable comparison with expected project buildout. Following consultation with Mr. Chang, the Air Quality section of **Chapter 16.5.3** has been revised as follows:

~~"A cumulative emissions inventory of Placer County for the pollutants of concern projected for the year 2015 ~~2020~~ is presented in **Table 16-1**. ~~Ozone precursor and PM₁₀ emissions are shown as a percentage of Placer County total emissions. California Air Resources Board (CARB) does not project emissions for Placer County beyond the year 2020; therefore 2025 p~~ Project emissions for the cumulative condition were compared to 2015 ~~2020~~ countywide emissions. URBEMIS output files for cumulative conditions ~~year~~ 2025 are included in **Appendix H**. Operation of the proposed project in the cumulative~~

2025 conditions would result in the generation of reactive organic gases (ROG), and oxides of nitrogen (NO_x), and particulate matter 10 microns in size (PM₁₀) as shown in **Table 16-2**. This would be considered a conservative comparison, since emissions of criteria air pollutants have been reduced over the last ten years due to more stringent mobile emission laws and a move towards lower emission fuels. **Table 16-2** shows that emissions associated with the proposed project would represent approximately less than 0.20% 0.056% of Placer County total emissions for ROG; and 0.22% 0.0067% of the total Placer County emissions for NO_x; and 0.11% of the total Placer County emissions for PM₁₀. The incremental effect of the proposed project, when considered in conjunction with existing and other proposed projects, is a small portion of the estimated Placer County total emissions.

TABLE 16-1
2015 2020 EMISSIONS INVENTORY FOR PLACER COUNTY

Sources	Pollutant of Concern		
	ROG	NO _x	PM ₁₀
	<u>tons per year pounds per day</u>		
Stationary	<u>13.258</u> 2,044	<u>6.936</u> 1,387	839.5
Area wide	<u>14.340</u> 2,840.5	<u>2.186</u> 401.5	9,526.5
Mobile	<u>21.062</u> 4,161	<u>40.520</u> 5,292.5	474.5
Total Emissions	<u>48,660</u> 9,045.5	<u>49,642</u> 7,084	40,840.5

Source: CARB, 2007~~8~~

TABLE 16-2
2025 PROPOSED PROJECT CUMULATIVE EMISSIONS

Emission Category	Pollutant of Concern		
	ROG	NO _x	PM ₁₀
	<u>tons per year pounds per day</u>		
Area	<u>4.57</u> 0.74	<u>7.26</u> 1.26	0.02
Mobile	<u>92.86</u> 4.36	<u>120.00</u> 3.39	63.25
Project Total (adjusted for solar array reduction)	<u>97.43 (97.43)</u> 5.10	<u>127.26 (106.93)</u> 4.74	63.27
CEQA Threshold	10	10	80
Exceeds Threshold	<u>No</u> <u>Yes</u>	<u>No</u> <u>Yes</u>	<u>No</u>
Placer County <u>2015</u> 2020 Emissions	<u>48,660</u> 9,045.5	<u>49,642</u> 7,084	59,400
<i>Project's percentage of Countywide Total (%)</i>	<u>0.20</u> 0.056	<u>0.22</u> 0.067	<u>0.11</u>

Source: CARB, 2007; AES, 2008~~7~~

<u>IMPACT 16.8:</u>	<u>The proposed project would cause an exceedance of PCAPCD cumulative thresholds for ROG and NO_x.</u>
<u>SIGNIFICANCE:</u>	<u>Significant</u>
<u>MITIGATION:</u>	<u>Mitigation Measure 16.28</u>
<u>RESIDUAL SIGNIFICANCE:</u>	<u>Significant and Unavoidable</u>

Implementation of the environmental commitments and mitigation measures specified in Chapter 10.4, including the applicable reductions from use of the solar array (Mitigation Measure 10.2), would reduce cumulative area and mobile source emissions; however, PCAPCD thresholds for ROG and NO_x would still be exceeded under cumulative conditions, as shown by the amounts in parentheses in the table above. While the proposed project represents a small portion of cumulative emissions in Placer County, the SIA Plan EIR indicates cumulatively significant and unavoidable effects from increases in construction emissions and mobile source criteria air pollutants, primarily from vehicular sources (ESA, 1997). Even with a one-time offset contribution to the PCAPCD (Mitigation Measure 16.28), the proposed project would contribute to this cumulative impact.

Mitigation Measure 16.28: Contribute to PCAPCD to offset cumulative operational emissions

Mitigation Measure 16.28 applies to Impact 16.8

A one-time contribution of \$189,446 shall be paid to the PCAPCD's Offsite Mitigation Program. Because Mitigation Measure 10.3 would offset the amount of criteria pollutants in excess of 82 lbs/day, Mitigation Measure 16.28 is recommended to mitigate the remaining impact resulting from the 72 lbs/day of each criteria pollutant in excess of the cumulative threshold (10 lbs/day) up to the operational threshold (82 lbs/day). Despite this contribution, the project's cumulative air quality impact remains significant and unavoidable."

6-8 General mitigation measures suggested by the commenter are discussed below:

- i. The casino has been actively working with local public transportation agencies to ensure that customers and employees have viable alternatives to car travel. As stated in **Chapter 9.1.3**, Placer County Transit provides hourly bus service directly to the casino, with connections at the Roseville Galleria Mall to other local transit providers. "Transit ridership by casino patrons and/or employees has grown steadily since service was initiated in 2005" (p. 9-7). The current shuttle service, with two stops in downtown Sacramento serviced four times a

day, seven days a week, has not yet reached a level of ridership that would warrant expansion. However, casino management will continue to monitor shuttle and public transportation use, as stated in **Mitigation Measure 9.16**, and work to provide expanded service when demand exceeds the current service levels.

- ii. Extension of these lanes may be considered in the future when additional connecting Neighborhood Electric Vehicle (NEV) lanes are extended to surrounding jurisdictions; however, it is not considered feasible at this time due to limited use of these vehicles in the surrounding areas and potential environmental constraints associated with such extensive roadway improvements.
- iii. See response to point ii.
- iv. The Tribe will install charging stations in the new parking structure. **Mitigation Measure 10.2** has been modified as shown below to reflect this:
 - “Charging stations for electric vehicles will be installed in preferential spaces within the parking garage. A total of four spaces shall be provided, including three standard spaces and one handicapped-restricted space. Signs will also be installed reserving these spaces for electric vehicle use.”
- v. **Mitigation Measure 10.2** describes several of the “green” features of the expansion, including water- and energy-conservation measures and appliances, project-wide recycling program, and extensive an landscaping plan to reduce greenhouse gases and provide natural temperature regulation. An additional item has been added to this measure as follows:
 - “The proposed project will include tinted dual-pane windows with thermal breaks to minimize heat gain and reduce use of air conditioning.”
- vi. As described in **Mitigation Measure 10.2**, photovoltaic panels will be installed onsite to provide clean, renewable-source energy for a portion of the project’s needs. It has been determined that the optimum location for the panels is the surface parking lot on the eastern end of the casino property. This would provide shade for the largest number of parked vehicles, reducing hot starts and the resulting emissions. **Mitigation Measure 10.2** has been changed as follows to reflect this:

“The Tribe shall install a photovoltaic cell array on the roof of the proposed parking garage or in the surface parking lot on the eastern end of the casino property. The array would allow for shaded parking of 555 cars on the ninth level of the garage, while

producing approximately 1 megawatt (mW) of solar power. The installation of the photovoltaic cell array would reduce the demand on external electricity sources for the proposed project by approximately 1.4 million kilowatt hours (kWh) annually. External electricity could come in part from sources that emit GHGs, therefore, the installation of the photovoltaic array would substantially reduce the indirect GHG emissions from the proposed project.”

vii. The following item has been added to **Mitigation Measure 10.2**:

- “The gas-fired boilers in the central plant will be 15 parts per million (ppm) low-NOx boilers compliant with local code.”

viii. A payment of \$75,634 shall be made to the PCAPCD’s Offsite Mitigation Funding Program to mitigate impacts from long-term operational emissions of ROG and NO_x, as described in new **Mitigation Measure 10.3**, and a one-time payment of \$189,446 shall be made to the same program to offset cumulative emissions of ozone precursors in the buildout year, as per **Mitigation Measure 16.28**.

6-9 Construction mitigation measures suggested by the District are discussed below: **Mitigation Measure 10.1** includes several construction measures designed to reduce these short-term emissions. Items have been added to this mitigation measure as shown by the underlined text below:

- i. “The Tribe shall prepare a Construction Emission/Dust Control Plan, and submit it to the PCAPCD prior to groundbreaking.
- ii. Grading operations shall be suspended if fugitive dust exceeds District Rule 228, Fugitive Dust Limitations. A project representative, CARB-certified to perform Visible Emissions Evaluations (VEEs), shall routinely evaluate compliance with Rule 228. Fugitive dust is not to exceed 40% opacity and shall not go significantly beyond the property boundary to the extent feasible.”
- iii. As described in bullet point #10 of **Mitigation Measure 10.1**, “The Tribe shall control emissions of ROG and NO_x wherever feasible and cost-effective by requiring all diesel-powered equipment be properly maintained and minimizing idling time to five minutes when construction equipment is not in use, unless per engine manufacturer’s specifications or for safety reasons more time is required.”
- iv. “Earth-moving contractors shall not operate pre-1996 heavy-duty diesel equipment on forecast ‘Spare the Air’ days.

- v. Contractors shall use low-emission models of onsite stationary equipment to the maximum extent feasible.
- vi. Contractors shall use existing power sources (e.g., power poles) or clean fuel generators rather than temporary diesel power generators whenever feasible.”

6-10 Operational mitigation measures suggested by the District are discussed below:

Page 10-14 of the Draft TEIR lists several environmental commitments by the Tribe to reduce the already less than significant operational emissions of the proposed project. Additional items have been incorporated as shown by underlined text below.

1. Plans for landscaping include native and non-invasive drought-tolerant species, as described on page 3-12 of the Draft TEIR: “Because construction of the proposed parking garage would provide most of the needed parking spaces for the expanded facilities, surface parking lots along the south side of the casino parcel would no longer be needed. Plans for the expansion include extensive landscaping in these locations, including a garden area of native vegetation located to the east of the performing arts center. Trees, shrubbery, and undulating walkways would frame the frontage along Athens Avenue...”

The following item has been added to the list of environmental commitments in **Chapter 10.4** of the Revised Draft TEIR: “High water-demand plants shall be minimized in landscaping plans. Native and drought-tolerant plant species (trees, shrubs, and ground cover) shall be emphasized.”

2. New construction will use low-VOC coatings on interior and exterior surfaces per State of California requirements and *District Rule 218 Architectural Coatings.*”
3. **Mitigation Measure 10.2** describes several energy conservation measures that will be implemented during the expansion project.
4. “Occupant sensors will be installed in all hotel rooms to automatically turn off lights and reset temperature controls to default settings to reduce energy consumption.”
5. Passive solar design and solar power has been incorporated into the project design. Solar panels will be installed in the parking lot to provide a clean, renewable energy source (**Mitigation Measure 10.2**).

6. Installation of equipment to capture and store waste heat would be infeasible, due to indoor air quality issues.
7. The proposed project does not include the type of ground level air-cooled HVAC units that could be equipped with these ozone destruction catalyst systems. Instead, roof-mounted air handling units will circulate chilled water supplied through the central plant to regulate internal building temperatures (see **Chapters 3.2.1** and **3.4.5** of the Draft TEIR). These types of air handling units are incompatible with the recommended catalyst systems; therefore, this measure is considered infeasible.
8. “Truck loading and unloading docks will be equipped with 110/208 volt power outlets. Diesel trucks shall be prohibited from idling more than five minutes and will be required to connect to the 110/208 volt power to run auxiliary equipment. Signage stating these requirements will be provided.”
9. **Mitigation Measure 10.2** has been expanded as follows: “Charging stations for electric vehicles will be installed in preferential spaces within the parking garage. A total of four spaces shall be provided, including three standard spaces and one handicapped-restricted space. Signs will also be installed reserving these spaces for electric vehicle use.”
10. Water-heating units in the proposed expansion will be water-to-water heat exchangers. All heating is and will continue to be generated at the central plant by 15 ppm low-NO_x, gas-fired boilers compliant with local code.
11. This measure is infeasible due to the large area that must be maintained and the distances from electrical outlets on many portions of the casino property.
12. No residences are proposed as part of the project; therefore, this measure is not applicable.
13. Given the size of the casino parcel and the distance from electrical outlets at many points, this measure is infeasible.
14. The nearest sensitive receptors are located approximately 0.85 miles from the project; thus, this measure is not applicable.
15. As per **Chapter 3.4.8** of the Draft TEIR, “Traffic corridors within and leading to the surface parking lot on the east side of the casino building would be reconfigured to maximize efficiency of traffic movement” (p. 3-20).

16. “Deliveries will be scheduled for off-peak traffic hours whenever feasible.”
17. **Mitigation Measure 9.15** (p. 9-33) describes the proposed signal coordination at the three project driveways, the Athens Avenue/Industrial Avenue signal, and the future proposed Athens Avenue/Foothills Boulevard North signal.
18. The traffic impact analysis shows that vehicle queuing (and consequent idling) at entranceways will be minimal following implementation of **Mitigation Measure 9.15**, Signal Coordination at Project Driveways (p. 9-33).
19. A Transportation Plan will be prepared in accordance with the County’s Trip Reduction Ordinance, as per **Mitigation Measure 9.14** (p. 9-32). The plan will include suggestions, information, and incentives to employees to carpool, vanpool, use public transit, or otherwise reduce vehicle trips.
20. “All flat roofs with parapets will be covered with a white or silver cap sheet to reduce energy demands.”
21. “Preferential parking spaces on the top floor of the parking garage will be reserved for vanpool use (one vehicle with six or more employees).”
22. **Mitigation Measure 9.16** describes the recommended steps that would help build, maintain, and enhance transit use by patrons and employees, including contributions to Placer County Transit.
23. A sheltered Placer County Transit bus stop is currently located near the casino entrance (**Chapter 9.1.3**), and will continue to be maintained for the expansion project.
24. “Improvements to Athens Avenue, project driveway intersections, and surface parking facilities will all be designed for bus access (both public transit and charter buses).”
25. See response to point 23.
26. See response to point 23; bicycle racks have been included in the existing casino facilities, and would continue to be available for the expansion project. Language has been added to **Chapter 9.1.4** of the Revised Draft TEIR as follows: “A bicycle rack is provided on the east side of the casino for patron and employee use.” **Impact 9.6** has also been amended as follows: “Bicycle racks would continue to be provided for patron and employee use.”

27. “Schedules and subsidized transit passes will be made available for employees who wish to use public transit.” **Mitigation Measure 9.16** is amended as follows: “...Thunder Valley Casino shall ~~make~~ subsidize PCT passes and make schedule information available to employees at the place of employment.”
28. The proposed project is not a shopping center, hospital/medical facility, or retail facility; therefore, the suggested measure does not apply.
29. The casino-provided shuttle is a free service to the south Sacramento area; transfers from the shuttle to local buses are under the authority of Regional Transit.
30. As per **Mitigation Measure 9.16**, the casino will provide fair-share funding of additional transit facilities/services, when needed.
31. A transit site already exists on the casino property; therefore, this measure is not applicable.
32. The suggested measure is designed for residential developments, and does not apply to the proposed project.
33. See response to point 26 regarding bike racks; as per **Chapter 9.1.4** of the TEIR, “The Placer County Bikeways Master Plan (Placer County, 2002) calls for a Class II on-street bikeway along the entire length of Industrial Avenue (approximately 10 miles). No other bicycle facilities exist or are proposed for the roads within the project vicinity.”
34. “Lockers and changing rooms will be provided to employees who choose to bicycle to/from work.”
35. The suggested measure is designed for residential developments, and does not apply to the proposed project.
36. The suggested measure is designed for residential developments, and does not apply to the proposed project.
37. See response to point 33. Pedestrian/wheelchair-accessible sidewalks and crosswalks are currently and will continue to be provided along Athens Avenue adjacent to the casino site (**Chapter 9.1.4**).
38. See response to point 26.

39. As per **Mitigation Measure 16.28**, a one-time payment shall be made to mitigate cumulative air quality impacts; a portion of this amount may be directed toward air quality monitoring equipment, at the discretion of the PCAPCD.
40. Given the proximity of the proposed project to the nearest monitoring station (in Roseville at North Sunrise Avenue, approximately 6.5 miles away), this measure is unnecessary.
41. Because only a relatively small percentage of the roof area would be compatible with these tiles, they are not considered effective for this project. However, **Mitigation Measure 10.2** includes provisions for an onsite photovoltaic array to supply power for the expansion project and provide shaded parking to reduce hot vehicle starts.
42. A payment of \$75,634 shall be made to the PCAPCD's Offsite Mitigation Funding Program to mitigate impacts from long-term operational emissions of ROG and NO_x, as described in new **Mitigation Measure 10.3**, and a one-time payment of \$189,446 shall be made to the same program to offset cumulative emissions of ozone precursors in the buildout year, as per **Mitigation Measure 16.28**.

RESPONSE TO COMMENT LETTER #7 – WESTERN PLACER WASTE MANAGEMENT AUTHORITY

- 7-1 The clarifications provided by Western Placer Waste Management Authority have been incorporated into the Revised Draft TEIR. The following changes have been made to **Chapter 14.1.4** of the Revised Draft TEIR:

“Collected non-hazardous wastes are transported to the Western Regional Sanitary Landfill (WRSL) or the Western Placer Waste Management Authority’s (WPWMA) Material Recovery Facility (MRF). The majority of the solid waste is first processed at the MRF which receives, separates, processes and markets recyclable materials. The MRF also processes source separated wood waste and composts green waste. Residual waste from the MRF is transferred to the WRSL.

The Western Regional Landfill WRSL is located on approximately 281 acres and is situated 1.5 miles west of the project site, near the intersection of Athens Avenue and Fiddyment Road. It is located on a 281-acre site with a permitted acreage of 231 acres for disposal. The landfill accepts construction/demolition materials, mixed municipal waste, and sludge. The landfill has a maximum permitted throughput of 1,900 tons per day. As of September 2007, June 30, 2005 the landfill had 29,093,919 23,798,423 cubic yards remaining out of a total capacity of 36,350,000 yards. The estimated closure date is 2036 2051 (California Integrated Waste Management Board [CIWMB], 2007a

WPWMA, 2008). The WPWMA MRF is located on approximately 53 acres and is also situated near the intersection of Athens Avenue and Fiddymont Road. It is located on a 53-acre site with a permitted acreage of 39.9 for operations. The MRF has a maximum permitted throughput of 1,750 tons per day, with an average daily throughput of less than 1,200 tons. A 480 465-acre site on the west side of Fiddymont Road (across from the landfill and MRF) could potentially be used for landfill expansion; however, no landfill expansion has been approved by the County nor has the WPWMA obtained a Solid Waste Facility Permit from the State. has been designated for eventual landfill expansion.

The existing casino has two trash compactors, which reduce solid waste volume. Solid waste from the existing casino goes to the MRF or the ~~Western Regional Landfill~~. WRSL. Municipal solid waste and construction/demolition loads containing recyclable materials are processed at the MRF and the residual waste is transferred to the WRSL. Solid waste that does not go through the MRF but directly to the WSRL includes sewage sludge, commercial food (restaurant) waste, and construction/demolition loads containing little or no recyclable materials sheet rock and construction debris.”

The following changes have been made to **Impact 14.4**:

As discussed previously, the estimated closure date of the ~~Western Regional Landfill~~ WRSL is 2036. 2051 and a 480 A 465-acre site on the west side of Fiddymont Road could potentially be used for landfill expansion; however, no landfill expansion has been approved by the County nor has the WPWMA obtained a Solid Waste Facility Permit from the State. has been designated for eventual landfill expansion.

Similar language in **Chapter 16.5.3** has also been changed accordingly.

- 7-2 The following language has been added to **Impact 14.4**: “Construction/demolition debris from the proposed project is estimated at 2,678 pulls, using a 40-cubic yard dumpster (107,120 cubic yards total). Daily pulls will not exceed 100 tons per day. Contractors will be required to process mixed debris loads through the WPWMA MRF for recovery of recyclable materials to the extent feasible. In the event that the daily MRF throughput reaches capacity, the General Contractor’s disposal service (Auburn Placer Disposal Service) will circumvent the overflow and use one of two options to dispose of construction debris. These two options include L&D Landfill located at 8231 Alpine Avenue, Sacramento, and the Auburn Transfer Station located at 12305 Shale Ridge Road, Auburn.”

- 7-3 The Draft TEIR has been revised to include the amount of potential sewage sludge waste generated from the expansion and frequency of deliveries to the Western Regional Sanitary Landfill. The following changes have been made to **Impact 14.4** in the Revised Draft TEIR:

“If the on-site wastewater treatment plant is expanded, the proposed project would also generate additional sewer sludge which would be disposed at the WRSL. The wastewater treatment plant currently produces approximately 500 tons of sludge per year. It is estimated that at buildout the treatment plant would produce approximately 1,600 to 2,000 tons of sludge per year. Based on the current disposal rate of approximately 6.25 tons per load, it is estimated that approximately 256-320 loads per year would be disposed at the landfill, which would equate to a disposal frequency of 1 to 1.2 loads per day (Brown, 2008). However, if wastewater service is obtained through a municipal provider, no sludge would be generated at the Thunder Valley WWTP.”

RESPONSE TO COMMENT LETTER #8 – PLACER COUNTY SHERIFF-CORONER-MARSHAL

- 8-1 Comment acknowledged. Thunder Valley Casino will continue to work with the Sheriff’s Department and other local law enforcement agencies to promote a safe and secure community for all.

RESPONSE TO COMMENT LETTER #9 - CITY OF ROCKLIN

- 9-1 As noted in the Traffic Impact Analysis (TIA, located in **Appendix F** to the Draft TEIR), the freeway mainline analysis was conducted in accordance with procedures published in Chapters 13 and 23 of the *Highway Capacity Manual* (Transportation Research Board, 2000) and specifically utilized the *HCS+* software package. Using this methodology, level of service on freeways is defined in terms of density (in passenger cars per mile per lane), which is considered the most accurate measure of the ability of vehicles to maneuver, given the proximity of other vehicles. Further, the analysis is conducted on a directional basis, including adjustment factors to account for the specific physical characteristics of the roadway (e.g., number of lanes, lane width, shoulder width, speed, grades, etc.) as well as the nature of the vehicular traffic (e.g., directional peak-hour volume; percentage of trucks, buses and recreational vehicles; driver type; etc.). In contrast, many other studies that have been conducted with respect to SR 65 operations have been based on development of volume/capacity (V/C) ratios, using hypothetical, generic values for daily freeway capacity (typically from the Placer County General Plan), based solely on the number of lanes on the freeway facility and not accounting for other factors that affect the capacity of an access-controlled roadway.

The weekday PM peak hour traffic volume data used in the freeway mainline analysis was based on counts conducted at the SR 65/Sunset Boulevard intersection on April 26, 2007 (as were all of

the counts along Sunset Boulevard in Rocklin). As necessary, adjustments were made (based on entering and exiting volumes at SR 65/Industrial Avenue and SR 65/Twelve Bridges Drive) to establish the existing traffic volumes for SR 65 freeway segments north of Sunset Boulevard.

In addition to the factors described above, misconceptions with regard to traffic operations on SR 65 may be due to inaccurate perceptions based on short-term conditions on that facility within the peak hour. In particular, the level of service analysis presented in the Draft TEIR represents conditions over the course of the peak-hour period. It is likely that greater congestion occurs during shorter periods within that hour, which may lead to the inaccurate perception that the roadway is congested throughout the peak-hour period. When the full hour is considered, however, the resulting level of service value is better than would be indicated in connection with the subset of the full analysis period.

In response to concerns about roadway operations in the project vicinity, a supplemental analysis has been conducted and is included as **Appendix E** of this document. The roadway segment analysis examined operations at ten roadway segments within the SIA, using average daily traffic (ADT) counts to determine current LOS. Project trip generation estimates and distribution patterns were considered to address the existing plus project conditions; cumulative year (2025) transportation system improvements and projected traffic volumes were analyzed to obtain cumulative and cumulative plus project conditions scenarios.

The project's impacts were evaluated at the following roadway segments:

- Athens Avenue west of Industrial Avenue (and east of existing casino driveways),
- Athens Avenue east of Foothills Boulevard north (and west of existing casino driveways),
- Athens Avenue between Foothills Boulevard North and Fiddymment Road,
- Fiddymment Road north of Athens Avenue,
- Fiddymment Road south of Athens Avenue,
- Foothills Boulevard North between Athens Avenue and Sunset Boulevard,
- Sunset Boulevard between Foothills Boulevard North and Cincinnati Avenue,
- Sunset Boulevard between Cincinnati Avenue and Placer Corporate Drive/South Loop Road,
- Industrial Avenue between Athens Avenue and South Loop Road, and
- Industrial Avenue between Athens Avenue and Twelve Bridges Drive.

Traffic counts were conducted at each of these roadway segments on Thursday, March 6, 2008. Using the daily LOS thresholds for roadway segments established in the Placer County General

Plan (1994), it was determined that each of these roadway segments currently operate at LOS B or better, thereby meeting the County’s LOS policy.

Addition of project-related traffic to the roadway network, using the same trip distribution assumptions as the original TIA (**Appendix F** of the Draft TEIR) would result in a decrease in LOS at five of these segments. At only one segment, however, would the decrease be substantial enough to cause a significant impact, i.e., cause the roadway to operate at an unacceptable LOS. The segment of Industrial Avenue between Athens Avenue and South Loop Road would decrease from a LOS B to LOS F with the addition of project traffic. **Impact 9.2** in the Draft TEIR has been revised, with language added as follows:

“ IMPACT 9.2:	The proposed project will generate a significant traffic increase during the weekday and Saturday PM peak hour, resulting in a decrease in LOS at intersections <u>and roadway segments</u> in the vicinity of the project site.
SIGNIFICANCE:	Significant
MITIGATION:	Mitigation Measures <u>9.5, 9.6, 9.8</u> through <u>9.14, 9.21, and 16.17</u>
RESIDUAL SIGNIFICANCE:	Less than Significant, except at the Athens Avenue/Driveway 4 intersection (impact here is considered Significant and Unavoidable)

A roadway segment analysis was performed using average daily traffic (ADT) counts at ten local roadways. A significant impact was identified on the segment of Industrial Avenue between Athens Avenue and South Loop Road, where the addition of project traffic would cause a decrease in LOS from B to F. Mitigation Measure 9.21 would reduce this impact to a less than significant level.”

Mitigation Measure 9.21 has been added to the Revised Draft TEIR as follows:

“Mitigation Measure 9.21: Industrial Avenue Roadway Improvements
Mitigation Measure 9.21 applies to Impact 9.2.

The segment of Industrial Avenue between Athens Avenue and South Loop Road is expected to operate at LOS F with the addition of project traffic. To mitigate this impact, this segment of Industrial Avenue should be widened from two lanes to four lanes (i.e., two in each direction). Based on the Placer County General Plan daily LOS thresholds

for a four-lane arterial with moderate access control, this measure should result in LOS A (v/c=0.54) on this study roadway segment, thereby fully offsetting the project's impact."

In the cumulative year scenario, all ten of the analyzed roadway segments would operate at an unacceptable LOS (assuming no improvements to these roadways are constructed in the interim). The addition of project-related traffic would exacerbate these conditions, resulting in a significant impact on all ten roadway segments. **Impact 16.1** has been amended as follows:

“IMPACT 16.1:	The proposed project would cause an increase in traffic in the weekday PM Peak Hour, which has the potential to decrease the LOS at area intersections <u>and roadway segments.</u>
SIGNIFICANCE:	Significant
MITIGATION:	Mitigation Measures 16.1 through 16.14 <u>and 16.18 through 16.27</u>
RESIDUAL SIGNIFICANCE:	Significant and Unavoidable at Sunset Boulevard/Cincinnati Avenue intersection due to lack of feasible mitigation (impact is Less than Significant at all other intersections)

Each of the analyzed roadway segments would operate at unacceptable LOS in the cumulative conditions scenario; addition of project-related traffic would exacerbate these conditions, resulting in a significant impact on the following ten roadway segments:

- Athens Avenue west of Industrial Avenue (and east of existing casino driveways).
- Athens Avenue east of Foothills Boulevard north (and west of existing casino driveways).
- Athens Avenue between Foothills Boulevard North and Fiddymment Road.
- Fiddymment Road north of Athens Avenue.
- Fiddymment Road south of Athens Avenue.
- Foothills Boulevard North between Athens Avenue and Sunset Boulevard.
- Sunset Boulevard between Foothills Boulevard North and Cincinnati Avenue.
- Sunset Boulevard between Cincinnati Avenue and Placer Corporate Drive/South Loop Road.
- Industrial Avenue between Athens Avenue and South Loop Road, and
- Industrial Avenue between Athens Avenue and Twelve Bridges Drive.

Implementation of Mitigation Measures 16.18 through 16.27 would reduce these impacts to a less than significant level.”

Mitigation Measures 16.18 through 16.27 have been added to the Draft TEIR as follows:

“Mitigation Measure 16.18: Athens Avenue west of Industrial Avenue Roadway Improvements

Mitigation Measure 16.18 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements:

- Widen the roadway segment from four lanes to six lanes.

Fair share responsibility: 41.8 percent

Mitigation Measure 16.19: Athens Avenue east of Foothills Boulevard North Roadway Improvements

Mitigation Measure 16.19 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements, to raise the predicted LOS F to LOS C:

- Widen this roadway segment to four lanes.

Fair share responsibility: 22.7 percent

Mitigation Measure 16.20: Athens Avenue between Foothills Boulevard North and Fiddymment Road Roadway Improvements

Mitigation Measure 16.20 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements, to raise the predicted LOS F to LOS B:

- Widen the roadway segment to four lanes.

Fair share responsibility: 13.2 percent

Mitigation Measure 16.21: Fiddymment Road north of Athens Avenue Roadway Improvements

Mitigation Measure 16.21 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements:

- Widen the roadway segment from two to four lanes.

Fair share responsibility: 3.4 percent

This measure, in conjunction with the anticipated level of development on Fiddymment Road assumed in cumulative conditions, would likely enable Placer County to reclassify this roadway as a minor arterial with moderate access control.

Mitigation Measure 16.22: Fiddymment Road south of Athens Avenue Roadway Improvements

Mitigation Measure 16.22 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements:

- Widen the roadway segment from two lanes to four lanes.

Fair share responsibility: 4.0 percent

This mitigation measure also assumes reclassification of this roadway to a minor arterial with moderate access control.

Mitigation Measure 16.23: Foothills Boulevard North between Athens Avenue and Sunset Boulevard Roadway Improvements

Mitigation Measure 16.23 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements:

- Widen the roadway segment from two lanes to four lanes.

Fair share responsibility: 10.8 percent

Mitigation Measure 16.24: Sunset Boulevard between Foothills Boulevard North and Cincinnati Avenue Roadway Improvements

Mitigation Measure 16.24 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements:

- Widen the roadway segment from two lanes to six lanes.

Fair share responsibility: 5.4 percent

Mitigation Measure 16.25: Sunset Boulevard between Cincinnati Avenue and Placer Corporate Drive/South Loop Road Roadway Improvements

Mitigation Measure 16.25 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements:

- Widen the roadway segment from four lanes to six lanes.

Fair share responsibility: 4.5 percent

Mitigation Measure 16.26: Industrial Avenue between Athens Avenue and South Loop Road Roadway Improvements

Mitigation Measure 16.26 applies to Impact 16.1.

At the time of project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements, to raise the predicted LOS F to LOS D (acceptable under the Placer County General Plan because this segment is within 0.5 miles of a state freeway):

- Widen the roadway segment from two lanes to four lanes.

Fair share responsibility: 41.7 percent

Mitigation Measure 16.27: Industrial Avenue between Athens Avenue and Twelve Bridges Road Roadway Improvements

Mitigation Measure 16.27 applies to Impact 16.1.

At the time of traffic project development, the Tribe shall provide a fair-share contribution toward the cost of the following improvements:

- Widen the roadway segment from two lanes to four lanes.

Fair share responsibility: 15.0 percent

9-2 Comment acknowledged. The text of **Chapter 9.2.1** has been revised to reflect the 1991 City of Rocklin General Plan as the applicable regulatory document: “The City of Rocklin’s ~~draft~~ updated General Plan (2005 1991) incorporates circulation issues and traffic volumes forecast for

freeway routes through the year ~~2025~~ 2005.” The third paragraph under “Level of Service Criteria” in **Chapter 9.2.2** of the Revised Draft TEIR has also been revised to reflect the 1991 LOS policy:

“The City of Rocklin ~~has elaborated on the~~ established a LOS policy ~~set~~ in the 1991 General Plan. The LOS standards for the City call for LOS C at all signalized streets and intersections, except for intersections located within 0.5 miles from direct interstate freeway access, where LOS D will be considered acceptable, during the PM peak hour on an average weekday; however, e Exceptions to this standard are allowed during peak hour traffic, where not all movements exceed acceptable levels, allowing in certain instances. ~~An intersection within one-half mile of direct access to an interstate freeway may acceptably operate at LOS D. Other exceptions may be granted if the decrease in LOS is considered temporary, if no feasible improvements can be implemented by the City, or if improvements that would increase the LOS are determined to be undesirable by the City.~~”

- 9-3 Appendix B to the TIA (Draft TEIR **Appendix F**) includes a memorandum documenting in detail the derivation of the trip generation estimates for the proposed project. As described there, that memorandum was the result of extensive research using a wide range of sources to identify appropriate trip generation rates that directly apply to Thunder Valley. Those sources included the *Trip Generation* manual (Institute of Transportation Engineers (ITE), Seventh Edition, 2003), the “Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region” (San Diego Association of Governments [SANDAG], April 2002), and several recent traffic studies prepared in connection with other existing or proposed tribal gaming facilities, including locations in Shingle Springs (El Dorado County) and San Diego County. A key document of this type was the *Traffic Needs Assessment of Tribal Development Projects in the San Diego Region – March 2003 Update*, which was prepared by San Diego County staff. The Shingle Springs document included data from counts at five northern California Indian casinos, including those with and without hotels and/or performing arts centers (David Evans and Associates, 2001; Fehr & Peers Associates, 1999).

The analysis also reflected information presented in the *Draft Existing Conditions Traffic Study – Thunder Valley Casino Expansion Project* (Kimley-Horn and Associates, June 2005), which includes the results of weekday and Saturday PM peak hour turning movements counts at a large number of intersections in the vicinity of the Thunder Valley complex, including the driveways at both the existing structure and the overflow parking lot on the east side of Thunder Valley Court, south of Athens Avenue. The existing trip generation rates at the current facility were then used as the basis for developing corresponding rates for the proposed expansion project, as seen in Table 10 of the TIA (**Appendix F** of the Draft TEIR).

One source for the adjustments employed in the trip generation analysis was Caltrans' Final Environmental Impact Report/Environmental Assessment for the Shingle Springs Rancheria project in El Dorado County. In particular, the adjustment for hotel trips (i.e., a 75 percent reduction from the Institute of Transportation Engineers *Trip Generation* manual value) was based directly on information presented in that Caltrans document. The traffic analysis for the Shingle Springs project (David Evans and Associates, *Shingle Springs Rancheria Interchange – Traffic Impact Analysis*, August 2001) included extensive documentation with respect to the validity and reasonableness of that adjustment factor, based on extensive survey data collected at gaming facilities with hotels throughout California and the U.S. A related report, *Shingle Springs Casino-Hotel Trip Generation*, by Larry Wymer (2003) documents the reduction of trip generation rates proportionate to the increase in gaming floor area, equivalent to the cited trend in trip generation rates for retail commercial centers, based on observed trip generation characteristics at five northern California Indian gaming facilities.

It should also be noted that Caltrans established and utilized a 40 percent “pass-by” trip factor for the Shingle Springs project. That factor accounted for pre-existing vehicle trips on U.S. Highway 50 that would be diverted from the freeway to the project. Specifically, the final environmental document states that, “. . . it was conservatively assumed that 40% of peak hour trips generated by the proposed casino project would be trips which are already assumed to exist within existing (and future projected baseline) US-50 traffic volumes during peak hours. Following the completion of the casino and interchange, this 40% is assumed to stop at the site rather than continuing past the site, which they would do in the absence of the development.” No such pass-by trip factor was applied in the Thunder Valley Expansion traffic study, which results in a conservative estimate of project-related trips.

- 9-4 The suggestion that higher volumes of traffic would use Sunset Boulevard due to congestion of the nearby freeway system is speculative. Furthermore, the offsite signage program described on page 3-24 of the Draft TEIR would help prevent this occurrence, as the preferred and most efficient routes to the casino will be clearly signed. This signage program has been reviewed by the Placer County Sheriff's Department (Comment Letter 8) and the Auburn Area CHP (**Appendix N** of the Draft TEIR), and received support as a comprehensive and well-designed program that will help alleviate traffic congestion and lost drivers on local roadways.
- 9-5 The future year roadway system included in the traffic analysis assumed inclusion of programmed roadway improvement projects listed in the *2027 Regional Transportation Plan* (Placer County Transportation Planning Agency [PCTPA], adopted September, 2005). The Placer Parkway project is not currently included as part of this plan. No current fee structure is in place that includes the Placer Parkway project. Thus, there is no certainty that this roadway will, in fact, be constructed within the time frame referenced in the comment. Further, the cumulative

conditions traffic volume projections used in the analysis were developed using the Placer County travel demand forecasting model, which had recently been updated to include all appropriate development projects and roadway system improvements. The roadway network in the updated model did not include Placer Parkway between Foothills Boulevard and SR 65. Thus, the Placer Parkway was properly excluded from the future conditions scenario in the TEIR analysis.

9-6 The fair share percentages were calculated in accordance with the approach accepted by Placer County, which is consistent with the methodology documented in the *Guide for the Preparation of Traffic Impact Studies* (Caltrans, December 2002). In effect, the fair share figure represents the proposed project’s fraction of the total growth in traffic. The table presented below summarizes the fair share calculations for the three subject locations.

**TABLE 3-2
FAIR SHARE CALCULATION SUMMARY**

LOCATION	WEEKDAY PM PEAK HOUR TRAFFIC VOLUME (TOTAL)					FAIR SHARE % ²
	Existing Conditions	Cumulative No Project	Cumulative + Project	Project Traffic	Total Growth ¹	
Intersections						
Sunset Blvd./Park Dr.	4,058	7,690	7,743	53	3,658	1.4%
Sunset Blvd./Stanford Ranch Rd.	4,147	7,180	7,233	53	3,086	1.7%
State Route 65³						
Blue Oaks Blvd. – Sunset Blvd.	4,947	10,250	11,543	1,293	6,596	
Sunset Blvd. – Whitney Ranch Pkwy.	4,082	10,230	10,625	395	6,543	
Whitney Ranch Pkwy. – Twelve Bridges Dr.	4,082	11,220	11,615	395	7,533	
Twelve Bridges Dr. – Industrial Ave.	3,673	11,190	11,278	88	7,605	
TOTAL	16,784	42,890	45,061	2,171	28,277	7.7%
Notes:						
¹ Difference between “Cumulative + Project” and “Existing Conditions” traffic volume.						
² “Project Traffic” over “Total Growth.”						
³ Mainline traffic volumes, both directions combined.						

Source: MRO, 2008

As per discussion with City of Rocklin staff, each of the proposed intersections is included under one or more traffic improvement fee programs; thus, the fair share contributions will be made directly to those programs.

9-7 By definition, inclusion of the auxiliary lane would create a “weaving section” between the Whitney Ranch Parkway and Twelve Bridges Drive interchanges. As defined in the *Highway Capacity Manual* (Transportation Research Board, 2000), “[w]eaving segments are formed when a merge area is closely followed by a diverge area, or when an on-ramp is closely followed by an

off-ramp and the two are joined by an auxiliary lane.” However, the *Highway Capacity Manual* also states (on page 13-18) that the weaving analysis procedures in that document, “. . . generally apply to weaving segments between 500 and 2,500 ft long.” Further, the manual states (on page 24-9) that, “[t]he maximum length for which weaving analysis is conducted is 2,500 ft for all configuration types. Beyond these lengths, merge and diverge areas are considered separately using the methodology of Chapter 25, *Ramps and Ramp Junctions*.”

Because the spacing between the future Whitney Ranch Parkway interchange and the Twelve Bridges Drive interchange (and, therefore, the effective length of the auxiliary lane referred to here) would exceed 2,500 feet, no modifications to the ramp junction (merge/diverge) analysis are necessary (i.e., the analysis results presented in the Draft TEIR are correct). With respect to the freeway mainline analysis, a conservative, worst case analysis was provided by not treating the auxiliary lane as being available for northbound through traffic. Because the defined role of an auxiliary lane is to ease the transition for drivers entering or exiting the freeway in this segment, it was not assumed to be available for use by through traffic. In this case, the auxiliary lane might be long enough to tempt some northbound through drivers to use it as a means to pass slower moving vehicles. Again, however, a conservative result was provided by assuming that this activity would not occur.

- 9-8 The intersection of Blue Oaks Boulevard and Lonetree Boulevard was not included in the analysis because little or no project-generated traffic would pass through this location. It is not on any logical route to/from the project site, except for a relatively small number of Rocklin residents. None of the proposed off-site directional signs would guide casino-bound drivers through this intersection. The awkward connection between Blue Oaks Boulevard and Industrial Avenue (through which any project-related vehicles traveling through the Blue Oaks Boulevard/Lonetree Boulevard intersection would need to pass) would discourage most patrons from using this route. Although the intersection may currently be subject to heavy utilization (which suggests the possibility of an existing deficiency that would not be a project-related responsibility), the degree of utilization would be virtually unchanged upon completion of the proposed project.
- 9-9 As the comment notes, the traffic counts were generally conducted in May and June, 2007 (although, as noted above, the SR 65/Sunset Boulevard count and the other Sunset Boulevard counts were performed in April, 2007). The June counts were generally performed early in the month, while school was still in session. With the obvious exception of the Saturday peak-period counts, all data collection occurred on a Tuesday, Wednesday, or Thursday, as is the common convention for such activities.

It should also be noted, however, that because of the nature of the proposed project and its trip generation patterns, the analysis periods addressed in this study were the weekday PM peak hour and the Saturday PM peak hour. Little school-related traffic occurs during the weekday PM peak hour, and virtually none occurs during the Saturday PM peak hour. The weekday AM peak hour, when school-related conflicts might be expected, was not addressed in the analysis as the proposed project generates relatively little traffic in that time period. Consequently, the importance of performing traffic counts on school days is minimal.

- 9-10 EMT staffing is not part of the operations and maintenance funding provided to the onsite fire station; these team members are considered Security staff, and are based directly out of the casino. As described in **Chapter 14.1.8** of the Draft TEIR, “Thunder Valley Casino currently has 15 Emergency Medical Technicians (EMTs) on staff, with a minimum of 2-3 per shift on duty at all times.... EMTs employed by the casino are trained to respond to a variety of medical issues ranging from low blood sugar to cardiac arrest. When more advanced medical care or transport to a hospital is required, Engine 77 responds (Ryzner, 2007).” The proposed expansion project would create an estimated 56 new Security team positions (**Table 5-11**). This represents an increase of approximately 50 percent over existing Security team staff; it is expected that the number of EMTs on staff would increase proportionately.
- 9-11 The nearest City of Rocklin fire station (#3) that would be called for mutual aid is located along Wildcat Boulevard immediately south of Whitney Ranch Parkway (map feature 8, **Figure 4-4**). While the most direct route to Thunder Valley Casino from this station would be north along Wildcat Boulevard/East Lincoln Parkway, west on Twelve Bridges Drive, and south on Industrial Avenue to Athens Avenue (a distance of approximately 3.75 road miles), this route would involve crossing the UPRR tracks at the current at-grade crossing located just west of Industrial Avenue. An alternate route (south on Wildcat Boulevard, southwest on Stanford Ranch Road, west on Sunset Boulevard, north on Foothills Boulevard North, and east on Athens Avenue) would eliminate the potential for train delays because of the grade-separated crossing on Sunset Boulevard; however, this route is approximately 1.4 road miles longer, and would increase response time by approximately 2-3 minutes. This would be a service-related impact caused by existing conditions, rather than a project-related environmental impact.

All of the local fire jurisdictions with mutual aid agreements are aware of the potential for delays due to trains at this crossing and other at-grade crossings along the UPRR tracks, and are aware of alternate routes to destinations on either side of the tracks. Proposed **Mitigation Measure 16.17** would eliminate the at-grade crossing and the consequent potential for train-related emergency service delays, to the benefit of all facilities within the region that rely on mutual aid fire and emergency service responders.

- 9-12 As stated in **Chapter 14.1.8** of the Draft TEIR, Engine 77 (from Sunset Station) is dispatched for all medical emergencies requiring advanced life support (ALS) or transport. As the casino is expanded, the Placer County Fire Department will be increasing the number of paramedics and apparatus providing ALS service. AMR ambulances are also dispatched with each call to 911, as per their contract with Sierra-Sacramento Valley Emergency Medical Services. Because AMR is a private, for-profit company that receives payment for services directly from patients or their insurance providers, any increase in demand for their services as a result of the casino expansion will be met with a corresponding increase in staffing, equipment, and service availability, so that the response-time requirements of their contract can continue to be met. No physical environmental impacts to surrounding jurisdictions would occur. Although service-related impacts are not required to be analyzed under the CEQA-equivalent review provided by this TEIR, no such impacts are expected.
- 9-13 The costs of ongoing training for firefighters, such as seminars on high-rise firefighting techniques, are shared by the cooperating jurisdictions, and are accounted for in their respective operation and maintenance budgets to the extent appropriate for each fiscal year. Therefore, costs for providing this training to Sunset Station firefighters are included in the yearly fees paid to Placer County Fire Department through the Amended Tribal-Placer County MOU (**Appendix A** of Draft TEIR). The most recent high-rise training seminar (November 2007) was hosted by the Sacramento Fire Department, which also provided all equipment needed for the training, so that mutual aid responders are familiar with the specific equipment used in that jurisdiction. It is anticipated that prior to the opening of the hotel, a training seminar would be conducted for all cooperating fire agencies/jurisdictions on the specific features of the hotel and the new ladder truck. This training would be a professional courtesy to ensure service levels are adequate for public safety, rather than mitigation for any environmental impacts. Under the CEQA-equivalent review provided by this TEIR, mitigation is only required for environmental impacts.
- 9-14 Placer County Fire Department has been intimately involved in building design plans to ensure compliance with California Building Codes and the amendments for high-rise buildings in Section 15.100 of the Sacramento Municipal Code. Details of the safety features incorporated in the proposed hotel and expansion are described under **Impact 14.8** in the TEIR, including a fire communication system (direct phone line) linked to the proposed fire control center, which would be constructed next to the existing Sunset Station. The Placer County Fire Department has installed a fire service repeater system inside the existing casino to provide increased first responder communications. A fire service radio system for the expansion is being developed and the fire control room has been located to increase the ability of command staff to be able to communicate with responding resources. As noted above, mutual/automatic aid responders would be invited to familiarize themselves with the hotel and its safety features prior to its

opening to the public. Pre-incident/response documents used by the Sunset Station are identical to those used by other stations within the Placer County Fire Department/CAL FIRE jurisdiction.

- 9-15 **Table 14-3** of the Draft TEIR lists the number of recent mutual/automatic aid calls responded to and requested by Thunder Valley Casino’s Sunset fire station. Between January 2006 and October 2007, Sunset Station equipment and personnel responded to 16 calls for aid from surrounding jurisdictions. During that same time period, no aid was requested from those surrounding jurisdictions. The mutual/automatic aid agreement between Placer County Fire Department/ CALFIRE and the City of Rocklin Fire Department, in conjunction with **Mitigation Measure 14.3**, ensures that any increase in calls for aid at the casino facilities will be offset by the availability of expanded Sunset Station resources for reciprocal responses. Given the past patterns of mutual/automatic aid responses described above, an impact to surrounding jurisdictions is not anticipated; furthermore, any such impacts would be service-related, rather than environmental impacts of the type addressed in this document. However, the Tribe has contacted the City of Rocklin to schedule a meeting, as requested.
- 9-16 A letter from PCWA, included as **Appendix F** of the Water and Wastewater Feasibility Study (**Appendix J** of the Draft TEIR), describes the ability of PCWA to serve the proposed project and the general requirements for receiving water service. Under the heading of “Water Supply Setting,” this letter notes the following: the proposed project will use 484 acre-feet per year from the remaining Zone 1 service area supply of 1905 acre feet, leaving 1421 acre feet available for other projects. Water service is reserved on a first-come, first-served basis, and is tracked as individual applications are approved. Water supplies are reserved for a project only when all of the Agency’s conditions have been met. Upon execution of a Facilities Agreement between the Tribe and the PCWA, the water needed to supply the proposed project would be reserved, and the agency’s remaining water supply for future development within the Zone 1 service area would be recalculated.
- 9-17 As more information regarding this alternative has been gathered, the option of connecting to the City of Roseville’s Pleasant Grove Wastewater Treatment Plant has been recognized as infeasible, and is no longer under consideration. The TEIR has been revised accordingly.
- 9-18 As is discussed in **Impact 14.9** of the Draft TEIR, each of the local law enforcement agencies responds to incidents involving individuals or events originating outside their jurisdictions:

“According to the Sheriff’s Department, of persons booked for crimes in Placer County, approximately 50% are residents of Placer County, including the incorporated areas, 25% are from Sacramento County, and the remaining 25% are from surrounding counties and other areas (D’Arcy, 2007). Thus, the incidents and arrests associated with non-residents

who are passing through a law enforcement agency’s jurisdiction are a mutual and a shared burden among the area’s law enforcement agencies. These incidents fall within the normal range of agency duties and, thus, do not represent a significant impact.”

Mitigation specified to assist the Placer County Sheriff’s Department and California Highway Patrol (**Mitigation Measure 14.4** of the Draft TEIR) would enable these agencies to more effectively respond to all incidents within their service areas, not only those related to the casino. No significant environmental impacts to other law enforcement agencies would occur. However, the Tribe has contacted the City of Rocklin to schedule a meeting, as requested.

9-19 The offsite signage program discussed in **Chapter 3.4.8** of the Draft TEIR is for directional information signs only, and is separate from Thunder Valley’s billboard advertisement sign program. It should be noted that the offsite sign locations presented in **Figure 3-10** are proposed, rather than approved, locations and are subject to change. The following clarifying language shown in underline/strikeout format is added to this chapter in the Revised Draft TEIR:

“Additional temporary signs for construction traffic would be placed within the casino parcel and along Athens Avenue and Thunder Valley Court. Proposed Offsite sign locations for permanent, temporary, and temporary changeable signs are shown on **Figure 3-10**. The proposed offsite directional signs would be located within public right of way or on private property within various jurisdictions and would require permits, compliance with sign ordinances, or other approvals from the applicable jurisdiction(s). A letter from the Auburn Area California Highway Patrol (CHP) regarding the proposed signage plan is included as **Appendix N**. The CHP supports the signage plan in order to reduce the potential for traffic congestion and accidents as distracted drivers unfamiliar with the area attempt to navigate to the casino.”

The following language has been added under **Chapter 3.5.1** of the Revised Draft TEIR, Required Permits and Approvals:

“13) Applicable jurisdictions: Permit or other required approvals for placement of offsite directional signage.”

Mitigation Measure 4.2 is also amended in the Revised Draft TEIR as shown in the underline/strikeout format below:

“A comprehensive signage plan, including preliminary designs, text, and measurements, will be prepared and submitted to Placer County for review and approval. The signage plan will show the proposed locations of all signs, and include details on illumination, colors and materials, and any necessary setbacks or clearance. Because some of the proposed directional signs would be located within Placer County right of way, an

encroachment permit may be required from the County prior to installation. Placement of signs within various jurisdictions will require compliance with applicable sign ordinances, including permits or other approvals.”

RESPONSE TO COMMENT LETTER #10 – CITY OF ROSEVILLE

- 10-1 The estimates for patronage of the expanded facilities are based on expected occupancy rates for each type of customer-generating use. As per **Table 3-1** of the Draft TEIR, much of the expanded space in the main casino building is dedicated to non-customer generating uses, such as circulation, storage, offices, kitchens, and other back-of-house facilities. One of the main goals of the expansion project, as stated in **Chapter 3.3**, is to offer more diverse entertainment opportunities and new amenities for existing and new patrons.

The number of new gaming positions, restaurant seats, hotel rooms, convention spaces, and performing arts center seats have been totaled, and adjusted for average daily occupancy. Additional gaming positions are expected to add approximately 841 daily guests, given the expected occupancy rates of each position. Approximately 343 non-gaming customers per day are expected to dine at the new restaurants. A total of 1,086 hotel guests are anticipated as a daily average. The meeting rooms are expected to draw an incremental daily average of approximately 490 guests; since many of those attending will stay in the hotel, they have been accounted for in the total listed above. Approximately 100 annual events of variable seating capacity are planned for the performing arts center, resulting in a daily average of 740 guests, in addition to the totals listed above. Naturally, there will be days and times when the number of patrons onsite exceeds the projected average, just as there will be times when total occupancy is lower.

The traffic impacts associated with the proposed performing arts center are specifically addressed in the Draft TEIR. The analyses reflect the fact that events in the proposed facility will begin after the typical PM peak hour. Nevertheless, a reasonable and realistic estimate of the volume of traffic associated with such events was developed and incorporated into the traffic analysis. As appropriate, the analysis reflects the likelihood that a substantial portion of the attendees at performing arts center events will also be casino patrons, so that the net increase in traffic due to such events will be somewhat reduced relative to events at free-standing venues. Mitigation for extra traffic related to special events has been included as **Mitigation Measure 9.19**.

- 10-2 **Chapter 4.1.1** has been revised to reflect updated conditions of the Del Webb project: “~~Recently constructed and~~ Developments and approved projects within the City of Roseville include the approved and developing recently completed Del Webb project (approximately six miles from the project site) and the North Roseville Specific Plan (approximately four miles from the project site).” Discussions of the West Roseville Specific Plan, along with the Roseville Conference

Center project and other major projects in surrounding jurisdictions, are included in **Chapter 16.5.2**.

- 10-3 See response to Comment 1-1. Each of the offsite improvements identified in the Draft TEIR, including proposed traffic mitigation measures at offsite locations, will be individually evaluated by the appropriate jurisdiction for CEQA compliance, and the Lead Agency will determine the appropriate level of CEQA review and documentation.
- 10-4 Refer to the response to Comment 9-3. As described, a detailed trip generation estimate was developed, which is documented in **Appendix B** to the TIA (which is presented as Draft TEIR **Appendix F**). The suggestion in the comment that the trip rate for the casino facility should be higher because of the presence of the hotel and performing arts center ignores the fact that separate trip generation values were developed and analyzed for those other components of the project. Each of the components' trip generation rates, and the reductions applied to them, are based on analysis of observed traffic data from other Tribal gaming facilities throughout California, and verified through Caltrans and ITE research. The combination of the individual trip estimates for the three project components (i.e., main structure, hotel, and performing arts center) represents a reasonable and conservative estimate of the total volume of traffic associated with the proposed project. Moreover, the various trip purposes referred to in the comment (e.g., offsite shopping, entertainment, and recreational) are already accounted for in the ITE's hotel trip generation rates used in the analysis.
- 10-5 **Mitigation Measure 9.13** states, "The Tribe shall contribute to the Placer County traffic mitigation fee program to fund the appropriate share of offsite improvements or area-wide improvements that are beyond the scope of the proposed project." The Placer County traffic mitigation fee program in the region of the casino (the Sunset Benefit District) includes the County fee, the South Placer Regional Transportation Authority (SPRTA) fee, the Highway 65 Joint Powers Authority (JPA) fee and the City of Roseville/Placer County Joint Fee Program. The amount of each of the traffic mitigation fees paid by the casino to these various programs will be determined by the County, in accordance with their existing Dwelling Unit Equivalent (DUE) fee calculation equations. Note that the timing of these fee payments and other mitigation measures have been clarified or updated in **Table 4-1** (Mitigation Monitoring and Reporting Program) in **Chapter 4.0** of this document, and in **Table 1-1** (Summary of Project Impacts and Proposed Mitigation Measures) in **Chapter 1.0** of the Revised Draft TEIR.
- 10-6 The calculation of the fair share percentage was performed in accordance with the approach accepted by Placer County, which is the methodology documented in the *Guide for the Preparation of Traffic Impact Studies* (Caltrans, December 2002). In effect, the fair share figure represents the proposed project's fraction of the total growth in traffic. When assessing fair share

contributions for a proposed project, it is inappropriate to include the existing traffic associated with the Thunder Valley Casino. To do so would violate the requirements that: (1) there be an “essential nexus” (i.e., a connection) between the mitigation measure and a legitimate governmental interest, and (2) the mitigation measure must be “roughly proportional” to the impacts of the project. In other words, only the proposed project (and not any existing facility) can be required to mitigate project-related impacts and the mitigation measures must directly reflect the extent of the impact caused by the proposed project.

- 10-7 As noted in the comment, the measure proposed in the Draft TEIR fully mitigates the project-related impact at the subject location. Although other improvements might be available that would accomplish the same objective, the proposed measure can be accomplished within the existing right-of-way and, in fact, within the existing limits of the pavement. Therefore, no additional environmental impacts would occur in connection with implementation of the recommended improvement, whereas the potential impacts of the mitigation measure suggested by the commenter have not been evaluated.
- 10-8 The option of re-activating the existing groundwater wells to supply the proposed casino expansion is currently not under consideration. Language in **Chapters 3.2.1, 3.4.6, 13.3, 14.3, 14.4, 16.1.1, 16.4, and 16.5.3** has been deleted or modified to reflect the elimination of this option.
- 10-9 The closure date has been changed in the Revised Draft TEIR as discussed in the response to Comment 7-1.
- 10-10 As noted in the response to Comment 9-17, the option of connecting to the Pleasant Grove WWTP has been dismissed from further consideration, for many of the reasons elaborated on in the City’s letter. Language in **Chapters 3.4.7, 13.3, 14.1.2, 14.3, 14.4, 16.1.1, 16.4, and 16.5.3** has been deleted or modified to reflect the elimination of this option.
- 10-11 **Chapters 4.1.1 and 14.1.8** have been revised to reflect the recent change in jurisdiction of the Placer Ranch project, and subsequently the two proposed fire stations within that project. A meeting between the Roseville Fire Department, Placer County Fire Department, and casino representatives will be scheduled to discuss future mutual/automatic aid agreements and fire response arrangements.
- 10-12 The Tribe appreciates the guidance provided by the City on evaluating the feasibility and constraints of connection to the Pleasant Grove WWTP. However, as noted in response to Comment 10-10, this option is no longer under consideration.

RESPONSE TO COMMENT LETTER #11 – UNION PACIFIC RAILROAD COMPANY

- 11-1 Comment acknowledged. The full grade separation described in **Appendix G** of the Draft TEIR as Alternative 1 will be pursued as the preferred option for the Athens Avenue UPRR crossing.
- 11-2 As stated in the letter included as **Appendix D**, further discussions between representatives of UPRR, Placer County, and Thunder Valley Casino during a meeting on May 6, 2008 have led to an agreement that construction of the physical interim improvements for the Athens Avenue/Industrial Avenue intersection and the Athens Avenue railroad crossing described in **Mitigation Measures 9.7** and **9.17** of the Draft TEIR should be foregone in favor of more rapid implementation of the grade separation described in **Mitigation Measure 16.17**, which is a long-term, permanent solution for operational and safety issues. **Mitigation Measure 9.7** in the Draft TEIR is therefore withdrawn, as any operational deficiencies of the Athens Avenue/Industrial Avenue intersection under Existing Plus Project conditions will be addressed with implementation of **Mitigation Measure 16.17**. The text of **Impact 9.2** in the Draft TEIR has been revised to reflect this new schedule, as well as the revisions made in response to Comment 9-1:

“IMPACT 9.2:	The proposed project will generate a significant traffic increase during the weekday and Saturday PM peak hour, resulting in a decrease in LOS at intersections <u>and roadway segments</u> in the vicinity of the project site.
SIGNIFICANCE:	Significant
MITIGATION:	Mitigation Measures 9.5, <u>9.6</u> , <u>9.8</u> through 9.14, <u>9.21</u> , and <u>16.17</u>
RESIDUAL SIGNIFICANCE:	Less than Significant, except at the Athens Avenue/Driveway 4 intersection (impact here is considered Significant and Unavoidable)”

Although it was decided at the May 6, 2008 meeting that the physical interim improvements at the Athens Avenue railroad crossing should not be constructed, UPRR representatives expressed support of operational measures to ensure that impacts to safety at the UPRR crossing would be reduced to a less than significant level pending completion of the grade separation. The text of **Impact 9.7** in the Draft TEIR has been revised as follows:

“IMPACT 9.7:	The proposed project will increase the potential for conflicts between vehicles and trains at the at-grade UPRR crossing along Athens Avenue.
SIGNIFICANCE:	Significant

MITIGATION: Mitigation Measures 9.17, ~~and 9.18,~~ and 9.19
RESIDUAL SIGNIFICANCE: Less than Significant”

The text of **Mitigation Measure 9.17** is changed as shown:

“Mitigation Measure 9.17: Union Pacific Railroad Crossing Improvements
 Mitigation Measure 9.17 applies to Impact 9.7

~~To mitigate project related impacts at the Athens Avenue at grade railroad crossing, the following improvements to the Athens Avenue/Industrial Avenue are recommended as an interim measure: Extend the existing dual northbound left turn lanes from 350 feet to 500 feet each, to provide additional full width vehicle storage in each lane; and (in conjunction with **Mitigation Measure 9.7**, above) extend the length of the southbound right turn lanes to provide 725 feet of full width vehicle storage in each lane. These modifications will ensure that adequate storage space is available for vehicles waiting to turn while a train passes and the crossing arms are in the “down” position. A demand-responsive queue detector should be installed within westbound Athens Avenue to force a green signal at the Driveway 3/Thunder Valley Court intersection, to ensure that vehicle queues do not extend onto the UPRR tracks. In pavement lights should be installed within the stop bar on eastbound Athens Avenue. These red lights would flash to notify drivers of an oncoming train. Casino patrons should be notified, via the Thunder Valley Casino website, signs, and printed materials at the casino, that the Foothills Boulevard North connector road is available as an alternative to the Athens Avenue/Industrial Avenue route across the UPRR tracks. The Tribe will complete these improvements prior to the opening of the expanded casino to the general public, unless circumstances beyond the control of the Tribe delay the construction of the improvements.~~

Additional changes to traffic movements would likely be required during the various phases of construction of the grade separation described in **Mitigation Measure 16.17**; traffic engineers and Thunder Valley Casino representatives shall continue to consult with Placer County, UPRR, and the Public Utilities Commission (PUC) regarding needed alterations.”

The text of **Mitigation Measure 9.19** is changed as shown:

“Mitigation Measure 9.19: Special Events Traffic Management
 Mitigation Measure 9.19 applies to Impact 9.8 and 9.7.

Site access and traffic information shall be provided on the Thunder Valley Casino website and at convenient locations within the casino and associated facilities.

Information will include maps and directions encouraging event patrons from southern locations to utilize Sunset Avenue to Foothills Boulevard North (rather than Industrial Avenue) to arrive at and depart from the facility. Notification of peak traffic hours will be provided to patrons, along with suggestions that patrons plan their trips outside of these hours in order to minimize the concentration of traffic.

Pending approval by the appropriate jurisdiction(s), ~~P~~permanent directional signs shall be provided along high-volume routes such as Interstate 80, SR 65, and County Roads, notifying drivers who may be unfamiliar with the area of the preferred route to Thunder Valley. This would reduce the number of drivers using local routes and surface streets, minimizing lost casino-bound drivers and increasing safety for local traffic as well as patrons. In addition, manual flaggers, California Highway Patrol officers, and/or electronic changeable message signs, barricades or cones will also be used to direct traffic along Athens Avenue before and after events, and signals at the three primary driveways will include a manual “override” setting that can be controlled directly by event personnel. The interconnected traffic signals at these driveways, the Athens Avenue/Industrial Avenue intersection, and the Athens Avenue/Foothills Boulevard North intersection will be reprogrammed (with the UPRR-interfaced signal control equipment, if applicable) for special events. Traffic control personnel and devices shall be provided by the Tribe. During construction at the Sunset Boulevard/SR 65 intersection, preferred traffic travel directions in the area may be revised in consultation with Placer County and Caltrans.”

- 11-3 The Athens Avenue/Union Pacific Railroad Grade Separation Feasibility Study (**Appendix G** of the Draft TEIR) applied the screening criteria established by the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), Federal Transit Administration (FTA), and National Highway Traffic Safety Administration (NHTSA) for a grade separation, and determined that several of the key criteria for a separation were satisfied under Existing Plus Project conditions (pages 19–24, **Appendix G**). As per the meeting between representatives from Thunder Valley Casino, UPRR, and Placer County, on May 6, 2008, the Tribe will pay the full cost of the planning, design, and environmental review for the grade separation upon approval of the TEIR. The remainder of the Tribe’s fair-share contribution will be paid at the initiation of construction of the grade separation. Placer County will act as the project proponent and Lead Agency for CEQA review, and will complete applications for funding from the Public Utilities Commission and from UPRR (**Appendix D**). **Mitigation Measure 16.17** has been modified as follows:

“**Mitigation Measure 16.17: UPRR Grade Separation**

Mitigation Measure 16.17 applies to Impact 16.6. and Impact 9.2

The Tribe shall provide a its fair-share contribution toward the planning, design, and construction of one of the UPRR grade-separation structure alternatives presented in the grade separation feasibility study (KHA, 2007) (**Appendix G**). The ~~project~~ Tribe's fair share responsibility has been preliminarily calculated to be 34.5 percent of the total cost. The Tribe shall pay the full cost of the planning, design, and environmental review for the grade separation when requested by the County and this cost shall be applied toward the Tribe's fair share contribution. The remainder of the fair share shall be paid when the project is ready to advertise for construction. The remaining costs would be shared by other planned local developments that would benefit from the grade separation. An Assessment District or other financing mechanism will be established for funding the construction of the improvements. Construction of this structure would require approval from the California Public Utility Commission and coordination with the UPRR.”

RESPONSE TO COMMENT LETTER #12 – PACIFIC GAS AND ELECTRIC COMPANY

- 12-1 The proposed project has been designed in close coordination with PG&E to ensure compliance with clearance and access requirements.
- 12-2 The proposed project has been designed in close coordination with PG&E to ensure that the proposed Lincoln-Pleasant Grove 60kV line adjustment is completed in accordance with all PUC and PG&E schedules and requirements.
- 12-3 Cumulative impacts to electric and gas service are addressed on page 16-39 of the Draft TEIR.
- 12-4 Thunder Valley Casino and the Tribe will continue to coordinate with PG&E for future expansion of service.
- 12-5 The scope of the Lincoln-Pleasant Grove 60kV line rearrangement has been reduced to the replacement/relocation of three poles along Athens Avenue and two poles within the casino site. Changes have been made to text in **Chapter 3.4.8** of the Revised Draft TEIR, to reflect this new scope:

~~“Eight~~ Three wooden utility poles adjacent to the south side of Athens Avenue would be removed along an approximately 2,500 700-foot long section of the line, and replaced with five taller wooden poles. of steel, concrete or wood, located within 30 feet of the southern edge of the Athens Avenue right of way. This would increase the spans between each pole, but would not alter the current alignment of the powerline ~~or the size and location of the existing utility easement~~ slightly to the south. Some minor utility

easements would be needed along Athens Avenue for the powerline adjustment, mostly within an existing easement for subsurface utilities. A small portion of new easement would be created for a single guy anchor that would be placed south of the existing easement. PG&E also has plans to upgrade ~~their~~ its electrical supply facilities service to the casino site, but this will only involve changing the conductors on the existing utility poles, and which would not necessitate removal involve relocation of any two poles within the project area.”

Text of **Chapter 14.3** has also been revised:

“Due to roadway improvements incorporated into the proposed project, approximately ~~2,500~~ 700 feet of the Lincoln-Pleasant Grove 60kV electrical line would be relocated as described in **Chapter 3.4.8**. The impacted line is located within an easement on the south side of Athens Avenue, from just east of Thunder Valley Court ~~Industrial Avenue~~ to the western portion of the project site. The proposed new location for the line would be mostly within ~~the an~~ an existing private easement for subsurface utilities on the south side of Athens Avenue. A small portion of new easement would be created for a single guy anchor that would be placed south of the existing easement. ~~Eight~~ Three wooden utility poles along the old section of line would be removed and ~~five taller steel, concrete, or replaced with taller~~ wood poles ~~would be located along the new section of line.~~ PG&E also has plans to upgrade its electrical supply facilities; this would involve relocation ; ~~but this will only involve changing the conductors on the existing utility poles, and will not necessitate removal or installation of two other poles within the project area.~~”

All plans regarding the pole replacement and related improvements along Athens Avenue and within the project site have been, and will continue to be, coordinated with PG&E to ensure compliance with requirements for easement access, clearance from centerline, line height clearance, lighting, and construction constraints.

- 12-6 Plans for offsite improvements in the vicinity of PG&E gas facilities have been designed with these clearance requirements in mind. All contractors will be bound to comply with PG&E requirements for gas pipeline excavation restrictions.
- 12-7 Comment acknowledged. The Tribe appreciates PG&E’s notification regarding electric and magnetic fields, and encourages interested readers to contact PG&E directly for more information on this issue of public concern.

RESPONSE TO COMMENT LETTER #13 – LINCOLN CROSSING COMMUNITY ASSOCIATION

- 13-1 As the closest sensitive viewers to the proposed project, it is acknowledged that some Lincoln Crossing homeowners may be more susceptible to visual impacts than other local residents. As described in **Chapter 8.1.4** of the Draft TEIR, “Residents of the Lincoln Crossing development, especially those along the southernmost edge of the nearest neighborhoods, may experience unimpeded views of the casino at a distance of 0.85 miles or more.” As described in the response to Comment 1-2, changes have been made to **Impact 8.1**, acknowledging a potentially significant impact to these residents. Additional mitigation is proposed in the response to Comment 1-2 to address this impact.
- 13-2 Increases in traffic on SR 65 have been discussed in the Traffic Impact Analysis presented as **Appendix F** of the Draft TEIR. Although the proposed project is not expected to significantly decrease the levels of service along SR 65 in the existing plus project analysis, a cumulative impact is acknowledged in the long-term (year 2025) analysis. **Mitigation Measure 16.16** of the Draft TEIR states that the Tribe will provide its fair-share percentage of the cost to widen SR 65 to six lanes between Blue Oaks Boulevard and Industrial Avenue, although this will not provide acceptable LOS on all segments of the freeway. Thunder Valley Casino and the UAIC will continue to work with Placer County, Caltrans, and local city jurisdictions to ensure that significant impacts related to the proposed expansion project will be mitigated to the maximum extent feasible.
- 13-3 **Mitigation Measure 8.1** has been added to the Revised Draft TEIR, to reduce the potentially significant visual impact that will be experienced by some Lincoln Crossing residents. A meeting is being scheduled with members of the Community Association to discuss the purchase and planting of appropriate varieties of trees along the community nature trail and/or on individual lots along the southernmost edge of the development. This would mitigate any impacts to a less than significant level.

RESPONSE TO COMMENT LETTER #14 – SIERRA CLUB-PLACER GROUP

- 14-1 Comment acknowledged. The specific views of the SIA in the vicinity of the casino are dominated by land uses (the landfill, biomass power plant, radio antennae, and other industrial uses; see **Figure 8-1**) that contribute little in the way of scenic attributes.
- 14-2 As discussed in **Section 8.3** of the Draft TEIR, a visual impact analysis including photo simulations of the proposed project has been conducted to comply with the County’s process for a Conditional Use Permit. This permit was designed to allow for exceptions to the building height limits specified in Chapter 17 of the Placer County Code (Zoning Ordinance). As stated in the Tribal-Placer County MOU, “the proposed action of the Tribe is not a County project and is not

subject to the discretionary approval of the County...” By completing a process that substantially complies with the County’s regulations, the requirements of the MOU are fulfilled.

- 14-3 The visual impact analysis photo simulations were created using architectural massing models and specific measurements to accurately represent the scale of the proposed hotel and other expansion features in proportion to the surrounding landscape. The photo simulations of the proposed project (**Figures 8-5 and 8-6**) present views from distances ranging between 0.65 and 3.4 miles. Therefore, the statement regarding viewing distances (“With clear weather conditions, it is anticipated that the proposed project could be seen from a distance of four miles or more...” p. 8-3) is unlikely to be interpreted by a careful reader as meaning that the project would *only* be seen from a distance greater than four miles.

While the proposed project may indeed be visible from a distance of more than four miles (as well as less), it is unlikely to be noticed as intrusive or disruptive at the distances the commenter states. The comparison of the proposed project to the Sacramento skyline as seen from I-80 near Auburn (a visual distance of 28.25 miles, measured between the Indian Hill Road interchange and the Capitol building [GoogleEarth, 2008]) is an inaccurate assessment of the viewing conditions associated with the proposed project. The proximity of the project to the varied topography of the lower foothills, and the much smaller scale of the single hotel tower versus the multiple mid-rise buildings in downtown Sacramento, will prevent the type of vast, uninterrupted views which characterize the broad, completely flat plain upon which downtown Sacramento is built. A change in the viewshed that already includes other industrial uses in the SIA is not considered a significant impact. As is stated on page 8-10 of the Draft TEIR, “Guided urbanization of this area, including changed views from local roadways and neighborhoods, is consistent with the long-term plans for western Placer County outlined in the General Plan and the SIA Plan.”

- 14-4 The proposed hotel has been designed with an objective of consistency with the Placer County Design Guidelines and the existing facilities on the project site. Within the parameters of that objective, the hotel design is appropriate for its setting and proposed use. As is stated in the Draft TEIR, “The architectural features, building materials, color palette, and landscaping plans for the expansion have all been developed to complement and enhance the existing casino building and related structures. Because the existing facilities have been approved [by Placer County], the intent of the expansion would be to present a cohesive and consistent aesthetic effect within the casino parcel and offsite improvement areas” (p. 8-10). While it is recognized that opinions and preferences in architectural style vary widely between individuals, it was determined early in the design process that understated simplicity and elegance would be preferable and more in character with the community than Las Vegas-style grandiosity. It is acknowledged that the preliminary architectural rendering presented as **Figure 3-5** in the Draft TEIR does not do full justice to the details of the proposed hotel design. **Appendix B** of this document includes more

comprehensive renditions of the expansion buildings and associated features, clearly showing the design details, varied vertical planes, and diverse exterior finishes that will provide visual interest and an aesthetic link to the existing facilities. The proposed extensive landscaping, water features, and detailed art installations recalling local wildlife and Native American cultural heritage themes would also enhance the visual setting of the casino property.

- 14-5 The Tribe has volunteered several environmental commitments to reduce the environmental impacts of project construction and operation, and additional mitigation measures are recommended throughout the TEIR with these very goals in mind. Installation of solar panels and energy-efficient appliances; hotel room occupant sensors; water-saving fixtures and programs; “carbon-neutral” energy sourcing; recycling of a broad range of waste materials; and planting of extensive (native and drought-tolerant) landscaping for CO₂ reduction are all included in the proposed project (**Chapter 10.4**). The construction of a parking garage and the configuration of the hotel as a tower will allow for the expanded casino facilities to actually reduce the paved footprint of the site from its current condition (**Chapter 3.4.1**). Measures to promote and facilitate use of alternative transportation to and from the casino have been implemented, and will be continued (**Mitigation Measure 9.16**).
- 14-6 A Reduced-Intensity Alternative was analyzed in **Chapter 16.1.1** of the Draft TEIR that included a lower (12-stories, approximately 200 feet) hotel; however, this option was rejected as not meeting the project objectives and not being economically feasible. Although the commenter’s suggestion for an alternative hotel design might be technically possible, such a configuration would not allow several of the project’s desirable attributes- the pool and spa could not be constructed as planned, areas designated for landscaping would have to be minimized, and the resulting structure would be inconsistent with several key elements of the Design Guidelines. There would be virtually no setbacks from any side of the parcel; the proposed alternative would essentially put a 100-foot-high block structure over the entire site. With a 100-foot height limit imposed on the proposed number of hotel rooms, there would be no room for horizontal or vertical plane articulation, varying roof heights or pitches, transitional landscaping, or pedestrian walkways. This alternative would be impractical and undesirable from an operational standpoint, as well- hotel guests and staff would have to walk unacceptable distances (up to ¼ mile) between the gaming floor, restaurants, performing arts center, and hotel rooms. Many hotel rooms would not have windows, and the interior of such a building would be less accessible for emergency response crews. The commenter’s proposed alternative would be infeasible for the reasons stated above.
- 14-7 As discussed in the response to Comment 1-2, visual impacts related to the proposed project would be potentially significant for sensitive viewers located along the southern edge of the Lincoln Crossing development. **Mitigation Measure 8.1** has been introduced to reduce these

impacts to a less than significant level. The measure suggested by the commenter would not be an appropriate mitigation for the impacts of this project.

RESPONSE TO COMMENT LETTER #15 - STAND UP FOR CALIFORNIA

- 15-1 Comment acknowledged. The UAIC looks forward to continuing an open and mutually responsive relationship with its neighbors in Placer County.
- 15-2 See response to Comment 14-2. By completing the visual analysis simulation that substantially complies with the process of applying for a Conditional Use Permit, the Tribe has fulfilled the requirements of the MOU. Discretionary approval by the County is not required.
- 15-3 Analysis of a Reduced-Intensity Alternative, including a lower-height hotel, determined that this alternative would not be economically feasible (**Chapter 16.1.3**), as discussed previously in the response to Comment 14-6. However, impacts to some sensitive viewers have been reassessed as potentially significant (**Impact 8.1**, see response to Comment 1-2), and **Mitigation Measure 8.1** has been introduced to reduce these impacts to less than significant levels.
- 15-4 Page 14-25 of the Draft TEIR (**Impact 14.8**) discusses the anticipated fire response needs of the proposed expansion project:

“Through consultation with Placer County Fire Department and CAL FIRE, the following additional staff, funding, and equipment have been identified to meet the projected demand of the proposed project:

- Staffing of a four person ALS truck company;
- 100-Foot Ladder truck;
- Sunset station expansion to accommodate additional staffing needs and storage;
- Increased operations and maintenance funding;
- Type IV ALS equipped vehicle for access to the proposed parking structure (Harris and Smith, 2007; Harris, 2007).

This increase in required personnel, funding, and equipment would represent a potentially significant increase in demand on fire protection and emergency services. With additional development in the SIA and the planned Placer Ranch development, the fire department anticipates a need for a ladder truck even without the proposed casino expansion.”

Discussion with local fire officials has resulted in a determination that 50 percent of the funding for the proposed ladder truck would be a fair share amount. That percentage has been added to **Mitigation Measure 14.3**, below:

“Mitigation Measure 14.3: Funding for Fire Protection and EMS
Mitigation Measure 14.3 applies to Impact 14.8.

The Tribe shall provide full reimbursement of the costs associated with:

- Staffing of a three person engine company during construction, which shall be phased to a four person ALS truck company by January 2009;
- Increased operations and maintenance funding;
- Station expansion to accommodate additional staffing needs;
- Type IV ALS equipped truck for access to the proposed parking structure.

The Tribe shall provide fifty percent of the funding for ~~a fair share~~ of the costs associated with purchase and maintenance of a ladder truck. In addition, the Tribe shall continue the funding outlined in the MOU and MOU amendment between the Tribe and Placer County, including annual payments for three person staffing of a fire station and \$83,000 for operation and maintenance costs, subject to an annual consumer price index adjustment.”

Because the discussion of the impacts and the recommended mitigation measures acknowledge the need for project-specific equipment and apparatus, and provide Tribal funding for this equipment, a further amendment to the MOU is not warranted at this time.

- 15-5 The cumulative section of **Chapter 16.0** analyzed cumulative impacts for development and traffic associated with the level of growth through 2025. The cumulative analysis considers the impacts of the proposed project in conjunction with proposed development projects including the Regional University Specific Plan, which is specifically mentioned in the Draft TEIR (**Chapter 16.5.2**). Regarding traffic, full buildout of the Regional University Plan was specifically included in the cumulative analysis of the Traffic Impact Analysis (page 46 of **Appendix F**), with mitigation measures recommended as appropriate.

Social/cultural issues are largely outside the scope of the TEIR except within the context of the resulting physical effects to the environment; however, the cumulative analysis in the Draft TEIR addresses population, employment, housing and public services in a manner similar to projects analyzed under CEQA. The proposed project would not significantly increase the use of or demand for schools, parks, or libraries; therefore, the cumulative impacts to these services would

only include the Regional University Specific Plan and other planned residential or mixed-use developments in the region.

The Tribe would continue to compensate fire and law enforcement agencies through the MOU and mitigation measures recommended in the Draft TEIR, to reduce project impacts to public services to a less than significant level in the near-term and under cumulative conditions. Future development, including the Regional University Specific Plan, would provide additional funding and infrastructure for increased public service demands to prevent cumulative impacts. For example, the Regional University Specific Plan states that the University will staff its own public safety department 24 hours a day, 7 days a week and the Plan Area will include a Sheriff Services Center (Placer County, 2007e). In addition, future development will be subject to development impact fees and property taxes which fund public services and infrastructure, including transportation and circulation facility improvements.

15-6 Comment acknowledged.

RESPONSE TO COMMENT LETTER #16 - ENVY, LLC

16-1 Comment acknowledged. Some of the commenter's concerns are outside the scope of this environmental document; however, they have been responded to as appropriate.

16-2 The detailed socioeconomic statistical information requested would not address any physical environmental impacts of the project. Issues related to population, employment, and housing are discussed in the TEIR in the context of providing relevant information for environmental analyses of traffic, air quality, and noise impacts, as per CEQA guidelines. **Chapter 5.0** of the Draft TEIR provides the number of existing and projected employees, distances from their residences to the place of employment, and average salaries, as might pertain to these issues. Any impacts resulting from employee commutes or a need for additional infrastructure from the projected increase in workforce population have been addressed in the respective chapters of the TEIR. Given recent trends in the local housing market, impacts to local housing availability (including the balance of affordable housing for lower income households) would be less than significant, as stated in **Impact 5.2** of the TEIR.

16-3 During construction of the improvements to Athens Avenue prior to the opening of Thunder Valley Casino in 2003, specific requirements were put in place to preserve right of way width for the eventual construction of an eastbound left turn lane for the commenter's property, should approval for such a lane be obtained from the Placer County Departments of Public Works and Engineering and Surveying. The actual design, approval, and construction of such a lane would be the responsibility of the property owner, although discussions with Placer County have indicated that a left turn lane would be considered infeasible due to the proximity of the access

easement to the Athens Avenue/Industrial Avenue intersection. The current configuration of the access easement allows for construction of a right-turn in, right-turn out driveway. The roadway improvements proposed in **Mitigation Measure 9.7** will no longer be implemented, in order to move forward with construction of the grade separation, which is a permanent solution for operational and safety issues (see response to Comment 11-2). Therefore, no immediate alteration of this segment of Athens Avenue will occur.

The grade separation feasibility study (**Appendix G** of the Draft TEIR) offered two options for access to the commenter's property: the route through the temporary offsite parking lot (which would allow access by eastbound traffic on Athens Avenue), or an elevated driveway ramp that would rise to meet the elevated Athens Avenue roadway. Neither option includes a direct left turn from eastbound Athens Avenue, because no such lane currently exists; nor is one likely to be approved, given the pre-existing constraints noted above. The proposed grade separation would not alter the fundamental conditions affecting access to the commenter's property; a right-turn in, right-turn out driveway would still be feasible.

- 16-4 A visual impact to this property would be considered significant if it affected an existing population or land use, or if the specific viewshed from that property included scenic vistas that were highly valued by the greater community. The commenter's parcel is currently undeveloped. From the commenter's property, views to the north include the Lincoln Crossing residential and commercial developments; views to the west are characterized by the open space of the Orchard Creek Wetland Conservation Bank; views to the south include Thunder Valley Casino and other industrial uses within the SIA; and views to the east are dominated by the Union Pacific Railroad tracks, Industrial Avenue, and SR 65. The proposed project would not change the property's views to the west, east and north. The proposed project would not block or impede upon any of the views of open space that currently exist from the commenter's property. A change in the view to the south from this property is a less than significant impact, given that no developed land uses exist or have been approved on the parcel that would be potentially affected.
- 16-5 Design and planning of the grade separation will be a complex process, and the commenter will be welcome to attend meetings with the Tribe, Placer County, UPRR, and the Public Utilities Commission to ensure that access to his property is not unnecessarily impeded during construction of the grade separation. During any roadway construction project, existing driveways and access roads must be accommodated, and improvements proposed for the casino expansion project are not exempt from this requirement. However, as his parcel is currently undeveloped, and since no actual roadway for public access or use that would require such access exists at this time, no adverse effect would occur.

RESPONSE TO COMMENT LETTER #17 - LEE BASTIEN

- 17-1 The proposed Placer County/SPCA animal shelter was not included in the cumulative traffic study because it presents a land use that generates minimal traffic. The ITE trip generation manual does not include a rate for animal shelters because they are generally too low to contribute to an impact. The improvements proposed for the Sunset Boulevard/Cincinnati Avenue intersection are currently infeasible, due to a lack of available right of way. **Mitigation Measure 16.8** acknowledges the significant and unavoidable impact to this intersection in the cumulative condition.
- 17-2 Hotels and motels are not considered residential units for zoning purposes. According to Chapter 17 of the Placer County Code (Zoning Ordinance), the Industrial Park zoning of the project site and surrounding parcels includes hotels as an allowable use. The distance between the proposed project and the landfill was measured as 1.5 miles between the casino driveway at Thunder Valley Court and the easternmost edge of the landfill parcel. Measured between the westernmost corner of the casino parcel and the easternmost corner of the landfill parcel, the distance is more accurately stated as 1.2 miles; driving distance between the main casino driveway and the entryway to the landfill is approximately 1.7 miles (all measurements from GoogleEarth satellite imagery, 2008).
- 17-3 See response to Comment 10-11 regarding this issue. If the Placer Ranch project is approved and annexed to the City of Roseville, the two planned fire stations associated with that project would be under the jurisdiction of the City of Roseville Fire Department. Mutual aid agreements currently exist and would be continued between Placer County Fire Department and City of Roseville Fire Department.
- 17-4 Corrections to the Scoping Meeting minutes (**Appendix C**) have been made as follows:

“Mr. Lee ~~Bastian~~ Bastien, representing the Sheridan Municipal Advisory Council, introduced himself and noted that the tribe should follow Placer County’s policies regarding water use by new developments. His concerns are in regard to local ~~surface~~ ground water; he recommended that the tribe’s existing two wells [on the casino property] should be checked.”

RESPONSE TO COMMENT LETTER #18 - THE O’ROURKE FAMILY

- 18-1 See response to Comments 14-1 and 14-3.
- 18-2 See response to Comment 14-2 and 14-6.

- 18-3 See response to Comment 14-4.
- 18-4 See response to Comment 14-6.
- 18-5 Comment acknowledged.
- 18-6 A free shuttle service already exists from the casino to the Sacramento area, providing round-trip service four times a day, seven days a week (as stated in **Chapter 9.1.3** of the Draft TEIR). This service will be continued with the proposed expansion, and at the time when demand exceeds the current service capacity, the shuttle program will be expanded. **Mitigation Measure 9.16** also ensures the Tribe will provide funding to Placer County Transit to enhance and expand public transit service to the casino, at such time as demand exceeds the current service capacity. Other traffic impacts will be mitigated as per the measures stated in **Chapters 9.4** and **16.5.3** of the TEIR.

RESPONSE TO COMMENT LETTER #19 - JAN MCKINSEY

19-1 According to Placer County staff, in the SIA the Placer County traffic mitigation fee program includes the County fee program (i.e., the Sunset Benefit District), the South Placer Regional Transportation Authority (SPRTA) fee, the Highway 65 Joint Powers Authority (JPA) fee, and the Placer County/City of Roseville Joint Fee Program. A brief summary of the key projects included in each of these programs follows:

- Placer County/Sunset Benefit District
 - Foothills Boulevard – Construct 2 lanes from the City of Roseville line to Athens Avenue as well as a bridge at Pleasant Grove Creek
 - Industrial Avenue – Shoulder widening from the City of Roseville line to SR 65
 - Sunset Boulevard – Various widening and construction projects
 - State Route 65 – A new interchange at Sunset Boulevard
- SPRTA
 - Various improvements to regional facilities, including SR 65.
- Highway 65 JPA
 - SR 65/Sunset Boulevard interchange
- Placer County/City of Roseville Joint Fee
 - Baseline Road
 1. Add one eastbound lane from Foothills Boulevard to Walerga Road/Fiddymment Road
 2. Widen to six lanes from Walerga Road/Fiddymment Road to Watt Avenue
 3. Widen to four lanes from Watt Avenue to the Placer/Sutter County line

- Walerga Road – New bridge over Dry Creek
- Fiddymment Road
 1. Add two new lanes from Baseline Road to Pleasant Grove Boulevard
 2. Add two new lanes on a new alignment from Pleasant Grove Boulevard to north Roseville city limits.

Additional detail regarding these fee programs and roadway system improvements can be found on the Placer County Website at www.placer.ca.gov/Departments/Works/TrafficFee.aspx.

According to Placer County staff, the Placer Parkway project is not included in the Placer County fee program and, further, there is no currently-adopted fee program for that project (page 44 of the TIA, **Appendix F** of the Draft TEIR). However, a “Tier II” fee program is in the development stages, which would fully fund the portion of Placer Parkway within the Placer County limits. County staff anticipate that the fee program will be adopted by the end of 2008. Current discussions indicate that the proposed casino expansion project would not be subject to that fee. The Tier II fee that is being developed will apply solely to new growth areas, including Placer Vineyards, Curry Creek, Placer Ranch, Regional University, Sierra Vista, Brookfields, Creekview, Roseville MOU, and Lincoln General Plan Expansion areas. The Placer County traffic mitigation fee program is not limited only to environmental review of projects included within the program; it also covers design and construction of the projects. The fee is assessed as a one-time payment, as projects are developed. Thus, neither the existing casino nor other existing development projects pay into the fee program on an ongoing basis.

- 19-2 The recommended fair share contribution toward the SR 65 widening project relates directly to the area defined to have a significant traffic impact. According to the Draft TEIR traffic analysis, that area includes the segments referred to in the comment, from Blue Oaks Boulevard to Industrial Avenue. The traffic analysis did not indicate the need for improvements in the vicinity of the I-80/SR 65 interchange. With regard to the Lincoln Bypass, that project is already fully funded, and construction is expected to begin later in 2008. Therefore, no project-related contribution is necessary.
- 19-3 Caltrans has established minimum spacing requirements for interchanges on access-controlled freeways, such as SR 65. Specifically, “Design Information Bulletin Number 77 (DIB 77)” (Caltrans, January 31, 1995) calls for a minimum of 1.5 kilometers (nearly one mile) between interchanges in urban areas and 3.0 kilometers (nearly two miles) in rural areas (measured between the centerlines of the intersecting roadways). Construction will soon begin on the new SR 65/Sunset Boulevard interchange. Plans are also being developed for a new interchange at Whitney Ranch Parkway (which would also serve as the easterly terminus of the proposed Placer Parkway), and an existing interchange is located at Twelve Bridges Drive. The distance from Sunset Boulevard to Twelve Bridges Drive is approximately 3.8 kilometers (2.35 miles). Thus,

given the spacing considerations described here, it would not be feasible to construct an additional freeway interchange (in addition to the Whitney Ranch Parkway interchange) between Sunset Boulevard and Twelve Bridges Drive. Planned improvements to the SR 65/Twelve Bridges Drive interchange (including widening of the freeway overpass and substantial modifications to the ramp system) were included in the cumulative conditions analysis (see responses to Comments 5-2 and 5-3). No additional connections to Athens Avenue were considered, however, as none are included in adopted circulation plans. All proposed improvements to roadways and intersections that would be needed as mitigation for the proposed expansion project would be subject to CEQA, with the appropriate local government jurisdiction acting as the Lead Agency for review and approval.

- 19-4 Constructing and operating rail service of any type is extremely expensive, and represents a cost greater than any single development project could typically be required to bear, particularly in light of the CEQA requirements relating to “essential nexus” and “rough proportionality,” as described in the response to Comment 10-6. As suggested in the comment, provision of rail service is a regional issue, and the relevant planning process is administered by the Sacramento Area Council of Governments (SACOG), with input from all governmental jurisdictions in the region. As the operator of the Sacramento Area’s transit system (including both bus and light rail transit systems), Sacramento Regional Transit (RT) has substantial input in this regard, as does the Placer County Transportation Planning Agency (PCTPA). As noted in the comment, SACOG’s recently-adopted Metropolitan Transportation Plan 2035 does not include rail service of the type suggested in the comment for the area surrounding the proposed project. Other regional rail transit priorities have been identified, primarily including completion of the “DNA” light rail line, from downtown Sacramento through the Natomas area and terminating at Sacramento International Airport. Thus, little or no funding is available to pursue other rail transit opportunities. Locally, PCTPA has been involved in a regional effort to investigate a commuter rail system between Auburn and Oakland. In September 2005, the final report documenting the evaluation of capital and operating needs, funding requirements, institutional arrangements, and assignment of responsibilities was published (Reference: URS Corporation, *Final Report - Auburn-Oakland Regional Rail Service - Service Concept and Implementation Plan*). That analysis did not recommend a rail station in the vicinity of the proposed project.
- 19-5 The commenter offers several suggested mitigation measures:
- 1) If any passenger rail services (including light rail) were being considered in the cumulative condition (2025), the Tribe would welcome the opportunity to provide this service to casino patrons. However, no such service has been proposed in the various planning documents for regional transportation initiatives and funding programs.

2-3) The current rail easements in the vicinity of the casino are under the authority of Union Pacific Railroad and the Public Utilities Commission; any right of way acquisition or plans to include a rail stop would be dependent on those entities.

4) Any increase in public transit use would lessen the number of vehicle trips, and the emissions resultant from those trips. The Tribe has offered several commitments and mitigation measures to encourage public transit use, reduce vehicle miles traveled per person, and prevent or offset construction and operational air pollutant emissions (see responses to PCAPCD's comments and suggested mitigation measures, under Comment Letter 6, above).

5) If a future passenger rail service is established under Placer County Transit, then the existing agreement between the Tribe and Placer County Department of Public Works would apply, as per **Mitigation Measure 9.16**.

19-6 The Tribe thanks the commenter for her interest in this project and will add her name to the mailing list for notification/delivery of the Final TEIR.

RESPONSE TO COMMENT LETTER #20 - STAN RODRIGUES

20-1 Employment statistics for the existing casino and the proposed expansion project are included in **Chapter 5.0** of the Draft TEIR, including median wages. Contributions to the State of California are described in **Chapters 3.2.1** ("Incremental Device fees paid to the State of California from slot machine operation totaled more than \$10.6 million in 2006") and **3.4** ("The expanded gaming floor would increase the number of slot machines, consequently raising the annual State Incremental Device fees by more than \$16 million").

20-2 Contributions made to Caltrans' Transportation Improvement Bond initiative (\$33,800,000 annually since 2005) are discussed in **Chapter 9.1.1** of the Draft TEIR; contributions to various local law enforcement, fire and emergency medical response services are outlined in **Chapters 14.1.8 and 14.1.9**.

20-3 These comments are outside the scope of an environmental document.

20-4 Traffic impacts and recommended mitigation measures are addressed in **Chapter 9.0** of the Draft TEIR; impacts and recommended mitigation measures for biological resources, including wildlife, are included in **Chapter 6.0**.

20-5 The UAIC is committed to continuing a responsive and mutually respectful relationship with the citizens of California.

RESPONSE TO COMMENT LETTER #21 - STAN RODRIGUES

21-1 Comment acknowledged.

RESPONSE TO COMMENT LETTER #22 - STAN RODRIGUES

22-1 Comment acknowledged.

RESPONSE TO COMMENTS RECEIVED AT MARCH 26, 2008 PUBLIC MEETING

23-1-4 Mr. Pickett's comments have been addressed in the responses to Comment Letter 11, above.

23-5-6 Ms. Schmidt's comments have been addressed in the responses to Comment Letter 15, above.

23-7 No decision has yet been reached on the naming of specific facilities within the expansion project, but the casino will consider Mr. Kitchin's suggestion.