

4.12 CUMULATIVE EFFECTS

INTRODUCTION

Cumulative effects analysis broadens the scope of analysis to include effects beyond those solely attributable to the direct effects of the alternatives. Cumulative effects are defined as the effects:

“On the environment which result from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions regardless what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 CFR Sec. 1508.7).”

The analysis in this section expands the geographic and temporal borders to include the effects on specific resources, ecosystems, and human communities that occur incrementally in conjunction with other actions, projects and trends. The purpose of cumulative effects analysis, as stated by the Council on Environmental Quality (CEQ) “is to ensure that federal decisions consider the full range of consequences” (CEQ, 1997:3).

The cumulative analysis begins with: 1) identifying past, present, and future actions and projects in association with the status of the resources, ecosystems, and human communities that may be affected, and 2) defining geographic borders and time frame of the analysis.

The status of affected resources is based upon the information provided in **Section 3.0** of this document, from specific resource studies that have been undertaken for the alternatives, and additional review and analysis.

The geographic boundaries of the cumulative effects zone have been determined by the nature of the resources affected and the distance that effects may travel. As an example, increased sedimentation of waterways that result from a project are limited to the watershed in which they occur; as a result, it is only necessary to examine incremental effects within that watershed. Air quality emissions from a project, however, travel over far greater distances and therefore necessitate analysis on a county, air basin, or regional level. For this analysis, the geographic boundary of the cumulative effects zone is generally that of Del Norte County, although with many resources (water, biological etc.) smaller natural or cultural boundaries are used.

The time frame of the cumulative effects analysis extends to 2024. For many resources, information is unavailable to extend meaningful analysis to 2024; however, attempts have been made to provide all relevant information.

As recommended by CEQ's *Considering Cumulative Effects*, not all potential cumulative effects issues have been included in this EIS; only those that are considered to be relevant or consequential have been discussed in depth (CEQ, 1997:12).

LIST OF OTHER ACTIONS AND PROJECTS

Construction of a regional wastewater treatment project is likely to occur regardless of the Proposed Action. The issue of inadequate wastewater treatment and disposal is a chronic one that has been raised again by one of the respondents to the NOI, the North Coast RWQCB.

A list of other projects has been compiled through consultation with the Cooperating Agencies. This list includes:

- Upgrade of the City of Crescent City Wastewater Treatment Plant to meet RWQCB standards by June 2006;
- Coordination between the City of Crescent City and a local industry to provide additional treatment to industrial waste to free up interim capacity for use by the Project;
- Installation of a sewer main from the point of connection to the existing City of Crescent City main to the Tribe's property boundary;
- Installation of potable water main from the City of Crescent City and/or BOVSCD point of service to the Tribe's property boundary;
- General commercial, industrial, and residential development in Del Norte County;
- Construction projects as a result of implementation of the park master plan for Redwood National Park.

In addition to the list of projects, the Elk Valley Rancheria is currently pending approval before the NIGC of a management agreement for the existing casino facility. This action would not result in any cumulative impacts.

4.12.1 ALTERNATIVE A – PREFERRED ALTERNATIVE: CASINO, HOTEL, CONFERENCE CENTER, AND PARKING FACILITY

Cumulative impacts for each environmental issue area are discussed below and are assumed to be similar for the Proposed Action and project alternatives, although the relative intensity in each issue area varies. No cumulative impacts would occur under the No-Action Alternative.

LAND RESOURCES

Potential project impacts to land resources (topography, soils, seismicity, and mineral resources) are related to measures required to ensure proper design for site conditions. No potential cumulative impacts are relevant to this issue area. No mitigation is required.

WATER RESOURCES

The Proposed Action and preferred alternative, in addition to other projects that may be constructed in the vicinity, would be required to comply with the CWA as it relates to stormwater drainage and non-point-source discharges. The analysis contained in **Section 4.1.2** of this EIS and mitigation measures contained in **Section 5.0** consider potential project impacts within the context of other potential water resources impacts. Continuing development in the area could contribute stormwater runoff to the Crescent City Marsh and the Pacific Ocean. However, compliance with Regional Water Quality Control Board and U.S. EPA stormwater pollution prevention requirements would prevent off-site development, in combination with development associated with the Proposed Action or project alternatives, from causing cumulatively significant stormwater impacts. New development in the project area would also be extremely limited due to the zoning, general plan, and coastal zone designations present in the area. No potential cumulative impacts are relevant to this issue area. No additional mitigation is required.

AIR QUALITY

Cumulative impacts to the air basin are addressed within the requirements of the CAA and the General Conformity Rule. State implementation plans and local air district regulations are developed to ensure regional compliance with state and national ambient air quality standards. Emissions generated by future projects would be addressed during the environmental review for each project and would be mitigated to ensure compliance with the CAA and related laws and authorities. As such, using the significance thresholds contained in the General Conformity Rule and NCUAQMD New Source Review regulations, the air basin would not be significantly impacted by the Proposed Action or project alternatives when added to potential impacts from other actions. In addition, the cumulative impact would be insignificant when compared to other regional air basins such as Medford, Oregon or the Great Valley of California, with much poorer ambient air quality and a higher level of cumulative traffic increases and proliferation of sources of combustible emissions. No potential cumulative impacts are relevant to this issue area. No mitigation is required.

BIOLOGICAL RESOURCES

Potential impacts to biological resources on the project site would be reduced to a less than significant level through mitigation measures incorporated into project design, construction, and operation. Similarly, all other development in the area affecting these resources would be required to mitigate according to the applicable provisions of the CWA, ESA, and Del Norte County General Plan. The site has been used for resource extraction and agriculture (dairying, lily farming, and ranching) for many years. There is ample Sitka spruce and alder habitat in the immediate area that has not been subject to the same level of timber harvesting as the Martin Ranch site. Incremental cumulative impacts to biological resources as a result of the project alternatives are less than significant. No mitigation is required.

CULTURAL RESOURCES

Mitigation for potential impacts to unknown cultural resources has been specified for all project alternatives, and similar mitigation is required for all development in Del Norte County. No cumulative impacts to cultural resources would occur as a result of the Proposed Action or project alternatives. No mitigation is required.

SOCIOECONOMIC CONDITIONS/ENVIRONMENTAL JUSTICE

The Proposed Action or project alternatives would not trigger any other development that would place socioeconomic burdens on the County or nearby cities. Any additional development within the project vicinity would be required to conform with existing county zoning, pay applicable county fees, and operate according to Use Permit conditions set by the County.

The project has an incremental and beneficial impact to the economy of Del Norte County, one of the poorest economies in the State. No significant cumulative socioeconomic or environmental justice impacts would occur.

RESOURCE USE PATTERNS

If approved, the 203.5-acre site would not be subject to county land use jurisdiction. The Tribe proposes a low-density commercial recreation and entertainment land use that would be consistent to the extent practicable with the General Plan and the enforceable policies of the LCP.

The Tribe would rezone the property to Planned Unit Development (PUD). Pursuant to the Tribe's MOU with Del Norte County a specific plan would be developed with county input and citizen participation. All other future land uses in the region, outside of the project site, would be subject to approval by the appropriate local government. As such, the project would not result in changes to local resource use patterns. Any changes to area resource use patterns would be attributable to city/county policies only. No significant cumulative impacts would occur.

Other Fee-to-Trust Actions

It is possible that the Tribe may engage in unforeseen land transactions leading to other fee-to-trust actions. However, unless future Trust land is developed, it is unlikely that fee-to-trust actions would have an impact on resource use patterns. The principal resource of the region is timber and there are adequate timber reserves in the County owned by the federal government. No significant cumulative impacts would occur.

Transportation Networks

This section describes the conditions that are projected to exist along the roadway system in the vicinity of the project for cumulative year conditions. The cumulative year is assumed to be 2024 to correspond with Del Norte County's 20-year planning horizon.

Cumulative Roadway Network

The roadway network surrounding the project site is assumed to remain the same for Cumulative Conditions as for Existing Conditions.

Cumulative Traffic Volumes

Cumulative traffic volumes were established by assuming that area traffic volumes will increase by a yearly growth factor of 1.60 on Highway 101 through traffic, and 1.20 on all side street movement. Caltrans staff provided these multipliers. Cumulative background turning movements at the study intersections are depicted in **Figure 4** of Whitlock & Weinberger Transportation, Inc., 2006; **Appendix C**.

Cumulative Intersection Operations

Intersection operations were evaluated for cumulative weekday PM peak hour conditions. Intersection levels of service for Cumulative Conditions were calculated for each study intersection, and are summarized in **Table 4-21**.

TABLE 4-21
CUMULATIVE PLUS PROJECT INTERSECTION LEVEL OF SERVICE

Intersection Approach	Cumulative No Project		Cumulative Plus Project	
	Delay	LOS	Delay	LOS
Highway 101/Elk Valley Road	64.5	E	72.7	E
Highway 101/Sandmine Road				
<i>WB (Sandmine Rd) approach</i>	11.7	B	13.6	B
<i>SB (Highway 101) left-turn</i>	8.6	A	9.1	A
Highway 101/Humboldt Road				
<i>EB (Humboldt Rd) approach</i>	16.2	B	16.6	C
<i>WB (Enderts Beach Rd) approach</i>	16.3	B	19.3	C
Humboldt Road/Sandmine Rd				
<i>EB (Project Access) approach</i>	9.7	A	13.3	B
<i>WB (Sandmine Rd) approach</i>	--	--	11.7	B

Notes: LOS = Level of Service.

Delay is measured in Average seconds per vehicle.

SOURCE: Whitlock & Weinberger Transportation, Inc. 2006.

Cumulative Plus Project Conditions

Traffic impacts were evaluated in terms of impacts at study intersections for Cumulative Plus Project conditions.

Cumulative Plus Project Intersection Volumes

Project trips for the proposed project were added to Cumulative (no project) intersection volumes for PM peak hour conditions, and are depicted in **Figure 4** of Whitlock & Weinberger Transportation, Inc., 2004; **Appendix C**.

Cumulative Plus Project Intersection Operations

Intersection levels of service for Cumulative Plus Project conditions were calculated for each study intersection, and are summarized in **Table 4-21** along with a comparison to Cumulative No Project intersection levels of service.

All existing study intersections are projected to operate acceptably at LOS C or better for Cumulative Plus Project conditions during the weekday PM peak hour with the exception of Highway 101/Elk Valley Road which would be expected to operate at LOS E with or without the project. Right-turn overlap phasing on the westbound approach of this intersection would reduce delay and result in LOS B. The proposed project would not significantly affect the operation level of study intersections under cumulative plus project conditions. A queuing analysis was performed at the intersection of U.S. 101/Sandmine Road as discussed in **Section 4.8.1**. Existing storage can accommodate approximately 5 vehicles and with cumulative plus project traffic the maximum queue would be 7 vehicles. As intersections would continue to operate at an acceptable level of service; this impact is considered less than significant. It is recommended that the storage be lengthened as a non-project approval as discussed in **Section 4.8.1**. There would be a less than significant impact to the study intersections by the proposed project in the cumulative year of 2024. No mitigation is required.

PUBLIC SERVICES

Improvement of infrastructure from Howland Hill Road, south along Humboldt Road to the site may spur land development along the Humboldt Road corridor, causing incremental growth and cumulative growth-inducing effects.

The Proposed Action and project alternatives would be supplied with domestic water from the City of Crescent City and/or BOVCSD water system, which receives its water from the groundwater aquifer below the Smith River. The City's Ranney collectors have adequate facilities and capacity to provide water to the Project. The City has used only a portion of its allocated water right to the Smith River. The project's portion of the allocated water right when

forecasted to the year 2024 has a less than significant impact on the City's total water right to Smith River water. No mitigation is required.

The City would upgrade and expand its wastewater treatment plant whether or not the project is built. The Proposed Action would contribute to the need for the expansion. No mitigation by the Tribe is required.

OTHER VALUES

The Proposed Action and project alternatives, when considered in combination with other planned and reasonably foreseeable future actions, would not lead to significant cumulative noise, visual, recreational, or hazardous materials impacts. No mitigation is required.

4.12.2 ALTERNATIVE B – GOLF COURSE, HOTEL, CONFERENCE CENTER, AND PARKING FACILITY (NON-GAMING ALTERNATIVE)

Cumulative impacts for some environmental issues would differ from those of Alternative A since a golf course would be constructed as part of Alternative B.

LAND RESOURCES

Cumulative impacts to the availability of agricultural soils of the region would occur if a golf course were constructed. No potential cumulative impacts are relevant to this issue area. No mitigation is required.

WATER RESOURCES

Incremental development in the area could contribute stormwater runoff to nearby water resources and the Pacific Ocean. However, new development in the project area would also be extremely limited due to the zoning, general plan, and coastal zone designations present in the area.

Development of the golf course would require secondary sources of water to supplement the City of Crescent City's supply. Groundwater wells located on site would provide a portion of the water required for maintenance of the golf course. Incremental groundwater withdrawals from the Tribe's proposed well, when taken into account with possible groundwater withdrawals from other wells in the vicinity, would have a significant, cumulative negative impact on groundwater resources. To compensate for groundwater withdrawals, an extension of recycled water pipelines to the site would be undertaken as a separate project by the City of Crescent City. No mitigation is required.

AIR QUALITY

An incremental negative change in air quality would occur as a result of the construction of a golf course and other facilities on the north coast within Del Norte County. However, the cumulative impact would be insignificant when compared to other regional air basins such as Medford, Oregon or the Great Valley of California, with much poorer ambient air quality and a higher level of cumulative traffic increases and proliferation of sources of combustible emissions. No potential cumulative impacts are relevant to this issue area. No mitigation is required.

BIOLOGICAL RESOURCES

Incremental cumulative impacts to biological resources would occur as a result of the golf course development and other land development in Del Norte County. However, the federal government owns most of the land in the region, and wildlife would retreat on to federal lands in the face of cumulative land development.

The proposed golf course would impact more than 9 acres of wetland on the Martin Ranch site. When taken into account with other projects to be developed on private lands of Del Norte County, each having incremental wetland fills, this would be a significant, cumulative impact. Mitigation is discussed in **Section 5.0**.

CULTURAL RESOURCES

Mitigation for potential impacts to unknown cultural resources has been specified for all project alternatives, and similar mitigation is required for all development in Del Norte County. No cumulative impacts to cultural resources would occur as a result of the Proposed Action or project alternatives. No mitigation is required.

SOCIOECONOMIC CONDITIONS/ENVIRONMENTAL JUSTICE

The golf course project alternatives would not trigger any other development that would place socioeconomic burdens on the County or nearby cities. Any additional development within the project vicinity would be required to conform with existing county zoning, pay applicable County fees, and operate according to Use Permit conditions set by the County.

Alternative B would have an incremental and beneficial impact to the economy of Del Norte County, one of the poorest economies in the State. No significant cumulative socioeconomic or environmental justice impacts would occur. No mitigation is required.

RESOURCE USE PATTERNS

All other future land uses in the region, outside of the project site, would be subject to approval by the appropriate local government. As such, the project would not result in changes to local resource use patterns. Any changes to area resource use patterns would be attributable to

City/County policies only. No significant cumulative impacts would occur. No mitigation is required.

Other Fee-to-Trust Actions

It is possible that the Tribe may engage in future land transactions leading to other fee-to-trust actions. For example, the Tribe intends on petitioning the federal government to transfer the fee land upon which the tribal headquarters building is built to the federal trust. However, unless future undeveloped trust land is developed, it is unlikely that fee-to-trust actions would have an impact on resource use patterns. The principal resource of the region is timber and there are adequate timber reserves in the County owned by the federal government. No significant cumulative impacts would occur. No mitigation is required.

Transportation Networks

The roadway network surrounding the project site is assumed to remain the same for Cumulative Conditions as for Existing Conditions. No potential cumulative impacts are relevant to this issue area. No mitigation is required.

PUBLIC SERVICES

Improvement of infrastructure from Howland Hill Road, south along Humboldt Road to the site may spur land development along the Humboldt Road corridor, causing incremental growth and cumulative growth-inducing effects. However, incremental growth along the Humboldt Road corridor would be planned and implemented according to the Del Norte County General Plan and City of Crescent City General Plan. No mitigation is required.

The golf course's need for water when taken into consideration together with incremental land development and growth in the region could cause a significant impact on the City's total water right to Smith River water and the capacity of the Ranney collectors to divert that water. The City would upgrade and expand its wastewater treatment plant to produce recycled water, whether or not the project is built. The golf course alternatives would contribute to the need for the wastewater treatment plant expansion and the extension of recycled water pipelines to the site. However, the use of recycled water to irrigate the golf course is a beneficial, cumulative impact.

OTHER VALUES

Alternative B, when considered in combination with other planned and reasonably foreseeable future actions, would not lead to significant cumulative noise, visual, recreational, or hazardous materials impacts. Use of Redwood National Park by visitors is well below levels of tourism forecasted during the debates of the 1960's that led to the establishment of the Park. Development of a resort with a championship golf course would simply draw potential park visitors to reach forecasts that have not been realized since Redwood National Park was

established in the 1970's. No potential cumulative impacts are relevant to this issue area. No mitigation is required.

4.12.3 ALTERNATIVE C – CASINO, HOTEL, CONFERENCE CENTER, GOLF COURSE, AND PARKING FACILITY

Cumulative impacts for some environmental issues would increase from those of Alternatives A and B since both a golf course and casino would be constructed as part of Alternative C.

LAND RESOURCES

Cumulative impacts for land resources issues would be the same as for Alternative B. There are no other potential cumulative impacts relevant to this issue area. No mitigation is required.

WATER RESOURCES

Cumulative impacts for water resources issues would be the same as for Alternative B. No mitigation is required.

AIR QUALITY

An incremental negative change in air quality would occur as a result of the construction of a golf course, casino and other facilities on the north coast within Del Norte County. However, the cumulative impact would be insignificant when compared to other regional air basins such as Medford, Oregon or the Great Valley of California, with much poorer ambient air quality and a higher level of cumulative traffic increases and proliferation of sources of combustible emissions. No mitigation is required.

BIOLOGICAL RESOURCES

Cumulative impacts for biological resources issues would be the same as for Alternative B. Mitigation is discussed in **Section 5.0**.

CULTURAL RESOURCES

Cumulative impacts for cultural resources issues would be the same as for Alternative B. No mitigation is required.

SOCIOECONOMIC CONDITIONS/ENVIRONMENTAL JUSTICE

Cumulative beneficial impacts for socioeconomic conditions/environmental justice issues would be greater than those of Alternative B due to the enhancement of the alternative on the general economic activity of the region. No mitigation is required.

RESOURCE USE PATTERNS

Cumulative impacts for resource use patterns would be the same as for Alternative B. No mitigation is required.

PUBLIC SERVICES

Cumulative impacts on public services would be the same as for Alternative B. No mitigation is required.

OTHER VALUES

Cumulative impacts on other values would be the same as for Alternative B. No mitigation is required.

4.12.4 ALTERNATIVE D – ENDERTS BEACH DEVELOPMENT

Cumulative impacts for specific environmental issues such as regional coastal land use and development, water resources, biological resources, public utilities, transportation, and visual resources would increase as a result of the Enderts Beach Development. Consequences of cumulative impacts are greater at Enderts Beach than at Martin Ranch owing to the higher quality and greater sensitivity of the coastline relative to inland locations.

LAND RESOURCES

Cumulative impacts for land resources of the Enderts Beach Development would be similar to those of the Martin Ranch alternatives. Impacts are less than significant and no mitigation is required.

WATER RESOURCES

Cumulative impacts for water resources issues of the Enderts Beach Development would be greater than those of the Martin Ranch alternatives. Wetlands that constitute the interface between the land and sea have higher functions and values than inland habitats since the former are generally less disturbed by agriculture (except dairying which is prevalent in the region) and silviculture. Estuaries are often associated with coastal plains where development might occur, and would be more prone to adverse effects of water quality and sedimentation than upland streams. Mitigation is discussed in **Section 5.0**.

Seawater intrusion is an ever-present problem in coastal areas where local hydrogeology permits. Therefore the cumulative effects of groundwater overdraft are more pronounced in coastal aquifers than landward ones. Groundwater extraction is proposed for the Enderts Beach alternative. During periods of regional prolonged drought, excessive groundwater withdrawals at

the project site could adversely interfere with neighboring groundwater wells. Mitigation is discussed in **Section 5.0**.

AIR QUALITY

An incremental negative change in air quality would occur as a result of the construction of the Enderts Beach Development on the north coast within Del Norte County. However, the cumulative impact would be insignificant when compared to other regional air basins such as Medford, Oregon or the Great Valley of California, with much poorer ambient air quality and a higher level of cumulative traffic increases and proliferation of sources of combustible emissions. Mitigation is discussed in **Section 5.0**.

BIOLOGICAL RESOURCES

Cumulative impacts for biological resources issues of the Enderts Beach Development are greater than those of the Martin Ranch alternatives. Biological resources of the north coast region of California and in coastal Oregon are often less disturbed and more biodiverse than inland redwood forests. Coastal regions form the interface between terrestrial, intertidal, and pelagic biomes and often harbor a suite of threatened or endangered species. Because coastal biomes are smaller in areal extent than inland forest biomes, and often more biologically diverse, the cumulative impacts of the project on biological resources are significant. Mitigation is discussed in **Section 5.0**.

CULTURAL RESOURCES

Cumulative impacts for cultural resources issues of the Enderts Beach Development would be similar to those of the Martin Ranch alternatives. Impacts are less than significant and no mitigation is required.

SOCIOECONOMIC CONDITIONS/ENVIRONMENTAL JUSTICE

Cumulative beneficial impacts for socioeconomic conditions/environmental justice issues of the Enderts Beach Development would be similar to those of the Martin Ranch alternatives. Impacts are less than significant and no mitigation is required.

RESOURCE USE PATTERNS

Transportation

Any development along the coastal Highway 101 corridor has the potential for cumulative impacts to transportation patterns. Much of the roadway in Oregon and northern California is four-lane divided highway or two-lane highway, but the overall usage of the route is below rated capacity. Impacts are less than significant and no mitigation is required.

Land Use and Coastal Zone

Cumulative impacts of the Enderts Beach Development on patterns of land use and on the coastal zone would be greater than those of Alternative A. There is very little developable land on the immediate Del Norte coast, and non-water dependent uses on fee land require special approval by the California Coastal Commission. Coastal lands that are suitable for development are scarce in the region, largely as a result of geology and topography and existing forms of land use. As a result of land scarcity, other projects in coastal Del Norte County and neighboring Curry County in Oregon would exacerbate the cumulative impact of the project on land resources. Transfer of fee land at Enderts Beach to trust status, when taken into account with incremental land development in coastal Del Norte County, is a significant cumulative impact on land resources. Mitigation is discussed in **Section 5.0**.

Agriculture

Cumulative impacts of the Enderts Beach Development on agricultural resource use patterns would be less than those of the Martin Ranch alternatives. Prime agricultural land of the region is often not immediately adjacent to the shoreline but more often associated with coastal plains. Impacts are less than significant and no mitigation is required.

PUBLIC SERVICES

Cumulative impacts on public services of the Enderts Beach Development would be similar to those of Alternative A. A wastewater line would require construction to link the Enderts Beach site with the regional wastewater treatment plant (**Appendix M**). Installation of a wastewater line along the principal transportation route of the region would have a significant cumulative impact on public services by encouraging leap frog strip and highway services development thus increasing the amount of wastewater to be treated by the City.

OTHER VALUES

Cumulative impacts on other values of the Enderts Beach Development would be similar to those of the Martin Ranch alternatives in large part due to the visually sensitive and high park quality of the north coast region.

Noise

Cumulative impacts for other values, specifically noise, of the Enderts Beach Development would be similar to those of the Preferred Alternative. Ambient noise levels at Enderts Beach are higher than those at the Martin Ranch site because of its proximity to the surf line and offshore rocks. Impacts are less than significant and no mitigation is required.

Visual Resources

The north coast and adjacent old growth redwood forest are of high scenic quality compared to the developed enclaves and forest plantations of the immediate coastal valleys. Development at Enderts Beach would have a significant adverse cumulative effect on the visual resources of the area. Through integration of architectural design and natural qualities of the site, the impacts are less than significant and no mitigation is required.

Parks and Recreation

There is very little privately owned land in Del Norte County. Much of the Del Norte Coast south of Crescent City is already part of Redwood National Park. The Park abuts the southern edge of the Enderts Beach property. Development of the property would have a cumulative effect on wilderness values but not parks and recreation values since the resort would complement the planning efforts of the Park in developing facilities for tourists. Through coordination between the Elk Valley Rancheria, the National Parks Service, the California Department of Parks and Recreation, and the County of Del Norte Parks Department, cumulative impacts to parks and recreation values are less than significant and no mitigation is required.

4.12.5 ALTERNATIVE E – NO ACTION

Under Alternative E, neither the Martin Ranch site nor Enderts Beach property would be taken into federal trust and no project-related activities would occur in these areas. Therefore, the No-Action Alternative would not result in cumulative effects.