

Phone: 916.683.7111
Fax: 916.627.4200

Web: www.elkgrovecity.org

8401 Laguna Palms Way
Elk Grove, California 95758



February 18, 2016

Mr. John Rydzik
Chief Division of Environmental, Cultural Resource Management and Safety
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Sent via e-mail john.rydzik@bia.gov and U.S. Mail

RE: Draft Environmental Impact Statement/Tribal Project Environmental Document Wilton Rancheria Fee-To-Trust and Casino Project

Dear Mr. Rydzik,

The City of Elk Grove (City) has reviewed the above referenced environmental document. I submit this comment letter, as well as the attached technical memorandums, for consideration in the preparation of the Final Environmental Impact Statement (EIS). Most of the comments in this letter and the attached technical memorandums are in regards to Alternative F because that is the only alternative within the City limits. While there is not an application at this time to take the Alternative F site into trust, our understanding is that this is still the appropriate time to comment on the Alternative F site.

The discussion below is in relation to fiscal impacts on the City's infrastructure and services. Further discussion of impacts will also occur in the attached technical memorandum.

Police Services. Page 2-28 of the Draft EIS it states that, "The City of Elk Grove Police Department EGPD in conjunction with Tribal security would provide law enforcement for the gaming facility and hotel complex." While this is an accurate statement if the facility were located within City limits, there is not a full discussion of how impacts to law enforcement would be mitigated. The EIS states the Project would generate a large volume of visitors to the City of between 8,100-9,000 on a week day and 12,900-14,200 on a weekend. Page 4.7-13 states there is an MOU with the City to provide "a framework for the Tribe to compensate" the City for public services. However, there are no further specifics. The number of law enforcement officers patrolling at this time does not take into account a facility of this size. This concern is acknowledged on page 4.7-22, where it states: "Destination casinos, by their nature, increase the volume of people in a given community." Wherever that volume of people is introduced the volume of crime but not necessarily the severity is expected to increase. In order to mitigate that volume increase the City requests that those mitigations be worked out now between the City and the Rancheria to avoid impact to the City.

Tax Revenues. The City is also concerned about impact to tax revenue. If Wilton Rancheria was to submit an application to put the property identified as Alternative F in trust, the property would no longer be subject to property tax, nor would the project be required to pay the City's impact or building permit fees. The property in question is currently zoned commercial, and the City would expect to receive significant sales tax from the property because it is adjacent to the approved outlet mall. In addition, any hotel on the property would not be subject to the City's uniform transient occupancy tax codified in Chapter 3.08 of the Elk Grove Municipal Code. As a former budget director, I can tell you that all of these revenue sources for the City are significant. While the EIS suggests that payments made to the local jurisdictions outweigh this lost revenue, there is not an analysis showing this to be true. Thus, the City requests working out the mitigation for lost revenues now.

Public Facilities. The Project will also impact public facilities located in the City of Elk Grove, which include but are not limited to libraries, trails, and parks. While the City is not the main agency that deals with parks, it does own some parks. Page 4-27 states that the Project does not anticipate patrons would visit libraries and parks, so therefore, there is no impact. This statement does not take into account all of the employees that the project would need and likely necessitate relocation to the City for at least a portion. The economic impact statement included in the Draft EIS (Volume 2, Appendix H, page 81) states that the casino would generate an estimated 2,914 jobs. It is fair to assume that a portion of those individuals filling those jobs would not be current residents; thus, the new residents would generate additional need for City facilities. The EIS assumes that 80% of the positions would go to Sacramento County residents without a basis or explanation for this percentage. Further discussion and analyses would be useful to help understand any impacts to the City.

The City acknowledges that this project is not subject to its existing codes, including the Lent Ranch Special Planning Area that currently controls the property described in Alternative F. However, a discussion of the City's Codes in relation to this Project is an objective measure by which the City can relay comments related to the casino project. Please find attached the aforementioned technical memorandum from the City's experts. Those memorandums cover aesthetics, air quality, land use, cultural resources, noise, police services, traffic, transit, water, sewer, and solid waste.

Thank you for the opportunity to comment. If you should have any questions, please feel free to contact me.

Respectfully,



Laura S. Gill
City Manager
City of Elk Grove

Interoffice Memorandum



January 28, 2016

Date

Laura Gill, City Manager

To

Christopher Jordan, AICP,
Assistant to the City Manager

From

Wilton Rancheria Draft EIS Review

Subject

The following are comments and concerns with the Draft EIS prepared for the Wilton Rancheria Fee-to-Trust and Casino Project.

Introduction

The following are comments on Chapter 1 of the Draft EIS:

1. Figure 1-5 identifies the incorrect Assessor's Parcel Numbers (APN) for the site. The correct APN is 134-1010-001.

Affected Environment

The following are comments on Chapter 3 of the Draft EIS:

2. Section 3.3.3 (page 3.3-15) provides incorrect information on groundwater level and supply and references a City system. The City is not a water provider. This section should be updated to reflect the actual water provider, who is Sacramento County Water Agency.
3. Section 3.4 (page 3.4-12) references sensitive air quality receptors near the Project sites. For Alternative F, the discussion does not reference the proximity to approved residential Projects, such as Sterling Meadows. This is information that should be referenced in this section and used in the analysis portion of the document.
4. Page 3.6-9 (Cultural and Paleontological Resources) identifies that Alternative F is over a half mile away from any residential concentration. The site, however, is 1,500 feet from the Hampton Oaks neighborhood. Additionally, approved residential projects are approximately 1,000 feet to the west of the site. This is information that should be referenced in this section and used in the analysis portion of the document.
5. Section 3.9.3 (Elk Grove Mall Site, Land Use discussion) – The following is a summary of the issues with this section. Please see attached track changes for more details.

- a. The governing zoning for the site is the Lent Ranch Special Planning Area, not a specific plan. The LRSPA, as applicable to the site, was last amended in October 2014.
 - b. As an SPA, the LRSPA is a part of the City's Zoning Code (Title 23 of the Municipal Code). Where the SPA is silent, the balance of the Zoning Code prevails; where there is a conflict, the SPA prevails.
 - c. The list of "zoning designations" on page 3.9-16 is actually a list of General Plan Land Use designations.
 - d. There are no airstrips near the Mall site.
 - e. In the Agricultural section, the City does not have an Urban Policy Area, nor an Urban Services Area. Rather, these are County provisions not applicable in City limits.
 - f. Figure 3.9-3 is incorrect. Land uses conform to the property limits. Specifically, the entirety of the Project Site is designated Commercial.
6. Page 3.10-10
- a. The nearest CCSD Fire Station is across SR 99 on Survey Road at the training facility. A closer station is planned at Kammerer Road and Lotz Parkway as part of the Sterling Meadows development, but has not been constructed. This should be referenced in the discussion.
 - b. The nearest trauma center is the Kaiser South Sacramento facility at Mack Road in the City of Sacramento. See http://gis.oshpd.ca.gov/atlas/topics/tc_dashboard.
7. Page 3.11-5 (Noise) – The Elk Grove Noise Element should be referenced in this section. It can be found online at http://www.elkgrovecity.org/city_hall/departments_divisions/planning/land_use_regulations/general_plan_and_community_plans/.
8. On pages 3.13-13 & 14:
- a. See previous comments re: land use and the LRSPA.
 - b. A discussion should be added regarding Elk Grove Municipal Code Chapter 19.12 (Trees).
 - c. The Mall site has been maintained. Weeds are mowed on an annual basis and the site is patrolled by security personnel.
 - d. The viewsheds of Alternative F presented in section are all on-site of the Project, unlike the other alternatives. The analysis that follows in Chapter 4 would be stronger if viewsheds from State Route 99 (driver perspective) and the residential areas to the north and west were included. This is especially important because the hotel would be taller than any building in the City or allowed by Code (LRSPA has a maximum height allowed of 100 feet in the Regional Mall district).

Environmental Consequences: Wilton Sites (Alternatives D & E)

- 9. Impacts from these alternatives would substantially modify the character and quality of the Wilton and Sheldon communities. Particularly, the traffic volumes and requirement improvements at Grant Line and Wilton and along Wilton Road are major physical

changes. Further analysis of the necessary mitigation measures on the environment are encouraged.

10. The Transit discussion on page 4.8-40 references the Twin Cities site, which is not consistent with the intended purpose of the paragraph. This should be corrected to read "The Historic Rancheria Site."

Environmental Consequences: Mall Site (Alternative F)

11. The analysis in section 4.7 (Socioeconomic Conditions) only analyzes the primary region of impact (the City of Galt) and therefore only works with Alternatives A, B, and C. It may not adequately analyze the potential impacts on Unincorporated Sacramento County (Alternatives D and E) or Elk Grove (Alternative F). The analysis should be supplemented with a discussion of why the approach is valid/justified for Alternatives D, E, and F.
12. Section 4.9.6 (Land Use):
 - a. If the Elk Grove site is selected, a determination of General Plan conformity is required under the Memorandum of Understanding Among the County of Sacramento, City of Elk Grove, and the Wilton Rancheria (see Section 3(a)(iii)). As such, Policy LU-1 of the General Plan should be added to the analysis in Table 4.9-4.
 - b. Specific discussion of consistency with the Lent Ranch Special Planning Area (zoning) should be included in this section.
 - c. This section concludes that the Project would be consistent with the Mall project as it is a large retail facility. While this may be the case, an analysis of differences in floor-area-ratio, building height, setbacks, and other land use metrics should be included to help document the consistency.
13. As previously mentioned, Kaiser South Sacramento is the designated trauma center for this area. Section 4.10.6 should be updated to reflect this.
14. Section 4.11.6, Construction Noise:
 - a. The analysis indicates that pile-driving is not proposed for the development. Given the soil conditions in the Sacramento Valley, construction of a 12-story hotel may be more economical with pile foundation. Therefore, the analysis may not be sufficient, if pile driving is contemplated.
 - b. The operational noise analysis only compares to the NAC and Sacramento County thresholds. It does not, and should, compare the Project to the City of Elk Grove Noise standards and policies.
15. All of the viewsheds analyzed for Alternative F are internal to the property. In section 4.13.6, no analysis is presented on potential impacts from adjoining properties, including, but not limited to, the Kaiser medical offices, residential uses across Highway 99, or views from the Highway itself. Further, the analysis identifies that the Project will improve the visual character of the area in comparison to the existing conditions. More information should be provided to document the impact of a 12-story hotel building on the broader surrounding conditions. There are no similar buildings in the Elk Grove area and such a project could have impacts on the visual character of the area not unlike that described in Alternative A.
16. On Page 4.14-13 (Noise), the discussion references imposition of Elk Grove regulations regarding noise. However, in the noise impact analysis section (as discussed above),

there are no references to these regulations, nor an analysis of consistency with Elk Grove noise policies found in the General Plan. The document should be updated for consistency and to clarify what standards the Project will be following.

17. The Indirect Effects from Utility/Infrastructure Improvements discussion in Section 4.14.2 excludes an analysis on the indirect effects of connecting to the public improvements in the Mall alternative. If not addressed elsewhere in the document, impacts to the sewer lift station and downstream trunk and interceptor capacity, as well as off-site well and treatment capacity for potable water, should be addressed.
18. Table 4.15-2 lists Cumulative Development in the City of Elk Grove that is included in the cumulative impact analysis. This table is incomplete and, in some places, inaccurate. For instance:
 - a. The Lent Ranch Special Planning Area is 295 acres in size, but its development is limited to approximately 3.1 million square feet of retail and 280 multifamily dwellings. No single family residential development is approved.
 - b. The table does not include the Sterling Meadows project adjacent to Lent Ranch, which includes 976 single family units and 200 units of multifamily as proposed and approved. The Large Lot Final Map for the project has recorded and improvement plans for the phased subdivision are being reviewed.
 - c. The Southeast Policy Area is not represented on the table. This project has a maximum development potential of 4,790 dwelling units and 23,410 jobs.
 - d. The Laguna Ridge Specific Plan is 1,900 acres, not 7,762. It has a build-out potential of 7,762 dwelling units.
19. On page 4.15-49 (Land Use), reference is made to Section 4.9 and a statement that the Tribe would develop the site consistent with City land use and development regulations. No such statement is present in this section; rather, the section states "The Tribal Government desires to work cooperatively with local and State authorities on matters related to land use." This section should be clarified.
20. Page 4.15-52 (Aesthetics) states: "...the development of Alternative F would be generally consistent with the visual goals of Elk Grove land use regulations." Given that the proposed hotel component of the Project is 12 stories, it would be helpful if the analysis described in more detail how the Project would not have an aesthetic impact on the community.

Mitigation

21. Section 5.4.2 identifies mitigation relative to operation and climate change. Mitigation for GHG/climate change impacts should include broader mitigation requirements to conform to Tier 1 CalGreen building efficiency standards, achieve Silver LEED standard (or better), or achieve other similar building efficiency standard as called for in the City's adopted Climate Action Plan. This approach would provide a broader range of options to achieving GHG reductions than those specifically listed.
22. In Mitigation 5.7.C on Page 5-16, is this payment consistent or similar to other mitigation payments for similar projects in the State? Additionally, shouldn't the payment be annually adjusted based upon the local Consumer Price Index?
23. I recommend that the following additional mitigation measures be explored for the Project:

- a. Require that all landscaping be designed and installed consistent with the requirements of the local agency and the State of California Model Water Efficient Landscape Ordinance in order to reduce the use of potable water for landscaping purposes.
- b. Require the extension of the “Purple Pipe” treated wastewater system from the Laguna Ridge area to the Project site to provide water for irrigation and (to the extent feasible) toilet systems within the Project. This would help reduce the overall water demand for the Project once the “Purple Pipe” system is operating with treated water from the Regional San plant after completion of the EcoWater Project.
- c. See previous comment on Section 5.4.2.

Recommended changes to Section 3.9.3

3.9.3 ELK GROVE MALL SITE -ALTERNATIVE F

Guidance Documents and Zoning Ordinance

Land use planning and development for the Mall site is guided by the City of Elk Grove General Plan (Elk Grove GP, 2009) and the Lent Ranch Specific Plan (2001).

Elk Grove General Plan

The objectives of the Elk Grove ~~GP~~ General Plan (adopted by City July 1, 2000) are to provide guidance to the development and management of land within the City of Elk Grove (Elk Grove). The Elk Grove ~~GP~~ General Plan summarizes its policies and implementation strategies as they relate to the City’s goals and objectives. The ~~GP~~ General Plan covers 16 elements, including Land Use. The Land Use Policy map describes what type of new land uses are desired or whether existing open lands will be retained for agriculture, habitat, or other uses.

In some areas, the Land Use Policy Map shows future uses which differ from the existing land uses. The Land Use Map portrays the ultimate uses of land in and around the community through land use designations (City of Elk Grove, 2009). **Table 3.9-3** depicts the City of Elk Grove’s strategies and policies applicable to the Mall site.

**TABLE
3.9-3**

CITY OF ELK GROVE APPLICABLE GENERAL PLAN STRATEGIES AND POLICIES

Policies	City of Elk Grove Planning Polices
LU-4	All land use approvals, including, but not limited to: <ul style="list-style-type: none"> • Zoning, • Planning documents (such as Specific Plans and Special Planning Areas), • Tentative Maps, • Conditional Use Permits, • Etc., shall be required to conform with the General Plan.
LU-7	The City encourages disclosure of potential land use compatibility issues such as noise, dust, odors, etc. in order to provide potential purchasers with complete information to make informed decisions about purchasing property.
LU -9	Land uses in the vicinity of areas designated as “Heavy Industry” on the Land Use Policy Map should include transitions in intensity, buffers, or other methods to reduce potential impacts on residential uses. Buffers may include land designated for other uses, such as Light Industry, commercial, or open spaces.
LU-35	Land uses in the vicinity of areas designated as “Heavy Industry” on the Land Use Policy Map should include transitions in intensity, buffers, or other methods to reduce potential impacts on residential uses. Buffers may include land designated for other uses, such as Light Industry, commercial, or open spaces.
LU-36	Signs should be used primarily to facilitate business identification, rather than the advertisement of goods and services. Sign size limits and locations should be designated consistent with this policy.

Source: City of Elk Grove, 2009

Lent Ranch Marketplace Specific Plan

The ~~Lent Ranch Marketplace Specific Plan (SP) as approved by Elk Grove City Council on June 27,~~

~~2001, guides and controls the nature of development within the Lent Ranch project area, a portion of which is the site of the proposed development of the Mall site Alternative. The SP provides standards, guidelines, and procedures necessary to satisfy the provisions in the City Code (City of Elk Grove, 2001). The Mall site and surrounding properties are located within the Lent Ranch Special Planning Area (SPA).~~

~~This 295-acre SPA has been designated for future commercial land uses. The Mall site is divided into five land uses consisting of a regional mall, community commercial, office entertainment, visitor commercial, and multi-family residential uses and is zoned SPA-LR by the City (City of Elk Grove, 2001). The SPA is consistent with the Elk Grove GP and related regulations, policies, ordinances and programs governing zoning amendments and adoption of SPA land use plans. The various land uses permitted within the SPA are consistent with the goals, policies, and general land uses described in the General Plan.~~

Elk Grove Zoning Code

~~Title 23, Zoning, of the Elk Grove Municipal Zoning Code (Elk Grove Code) carries out the policies of the Elk Grove GP General Plan by classifying and regulating the uses and development of land and structures within Elk Grove to be consistent with the GP General Plan. The Zoning Code is adopted to protect and promote the public health, safety and convenience, prosperity, and general welfare of residence and business in Elk Grove. A description of the applicable zoning designations for the Mall site and vicinity are described below.~~

Lent Ranch Special Planning Area

~~The Lent Ranch Special Planning Area (LRSPA) is a special purpose zoning district created for the area surrounding and including the Mall site. The purpose of a special planning area district is to designate areas for unique and imaginative planning standards and regulations not provided through the application of standard zoning districts. The City established the LRSPA in June 2001 to provide the standards, design guidelines, and entitlement procedures for development within the SPA. The majority of the 295-acre LRSPA is designed for commercial uses, including the Mall site.~~

Commercial

~~The Commercial designation is generally characterized by office, professional, and retail uses in any mix. Residential uses are not permitted.~~

Commercial/Office

~~Commercial/Office designation is generally characterized by office, professional, and retail uses in any mix. Residential uses are not permitted.~~

Commercial/Office/Multi-Family

~~Commercial/Office/Multi-Family land use designation is generally characterized by office, professional, and retail uses in any mix. Also includes high density residential development.~~

~~Heavy Industrial~~

~~The Heavy Industry land use designation is generally characterized by industrial or manufacturing activities, which may occur inside or outside of an enclosed building.~~

~~High-Density Residential~~

~~The High-Density Residential designation may consist of apartments, condominiums, or clustered single family (City of Elk Grove, 2009).~~

~~Light Industrial~~

~~The Light Industry designation is generally characterized by industrial or manufacturing activities, which occur entirely within an enclosed building.~~

~~Low-Density Residential~~

~~The Low-Density Residential designation is characterized by lot sizes that vary, generally from approximately 6,000 to 10,000 square feet (SF).~~

Regional and Local Setting

The Mall site is located in the City of Elk Grove, immediately west of Highway 99, north of Kammerer Road, and east of Promenade Parkway. The Mall site was partially developed in 2008 with parking facilities and shell commercial structures ~~including department stores and a movie theater~~; however, these commercial structures are only partially constructed and are vacant. Due to the downturn in the economy, the project has remained in a state of suspension for several years. In 2014, the City issued new approvals for a portion of the site. Development of this area is pending. ~~The partially developed~~ Both the 2008 and 2014 projects was are consistent with the City approved Leant Ranch SP-LRSPA.

Site and Vicinity Land Use

Land use on the Mall site is designated as Commercial in the Elk Grove GP (**Figure 3.9-3**). Existing land use to the immediate north of the Mall site is designated ~~Commercial-Office and~~ Commercial/Office. Across SR 99, and further north along Promenade Parkway land use is designated Heavy Industrial and Light Industrial.

Land use to the west is zoned Commercial, Commercial/Office/Multi-Family, Medium Density ~~Residences~~Residential, and Low Density ResidencesResidential (City of Elk Grove, 2009). Land to the south of the Mall site is outside of Elk Grove's boundaries and designated by the County as Agricultural Croplands (Sacramento County, 2011). Existing land uses northwest and west of the

Mall site include vacant land and agricultural uses, to the east is industrial, and to the north is primarily commercial. The nearest airstrip is approximately two miles northeast of the Mall site.

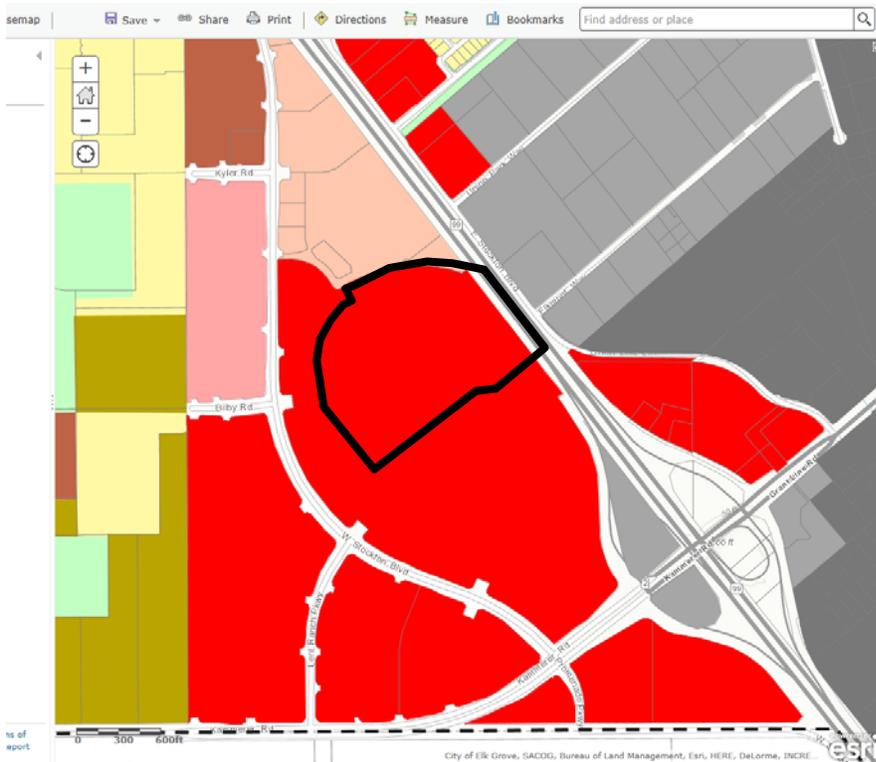
Agriculture

Prior to the incorporation of Elk Grove, the area of the Lent Ranch SPA and the surrounding parcels were in agricultural production, but were undergoing change as the area developed. ~~As part of the City's planning process after Elk Grove was incorporated, Lent Ranch SPA was included within the City's Urban Policy Area and the Urban Service Boundary. The designation of the area for urban development and subsequent development both within and outside of the SPA has removed much of the land from agricultural use.~~ As part of the establishment of the SPA, an Environmental Impact Report (EIR) was prepared (City of Elk Grove, 2000); this document addressed the environmental impacts to agriculture resources. These impacts were mitigated prior to construction in 2008 pursuant to the mitigation measures established in the EIR.

There are no farming operations on the Mall site or infrastructure that would support land cultivation. Consultation with the NRCS has determined that the Mall Site is not subject to protection under the FPPA due to the fact that it has been set aside for urban development. Furthermore, the Mall site is not under an active Williamson Act Contract (DOC, 2012).

The California FMMP classifies most of the Mall site as urban and built-up land.

Corrected Figure 3.9-3: Elk Grove General Plan Land Use Designations



Interoffice Memorandum



February 11, 2016

Date

Laura Gill, City Manager

To

Robert Lehner, Chief of Police

Elk Grove Police Department

From

Wilton Rancheria Draft EIS Review

Subject

The following are my comments and considerations as related to the Wilton Rancheria Draft EIS review:

1. **Section 3.10.4 Law Enforcement Services**

The Draft EIS (page 3.10-8) under the heading "Elk Grove Mall Site" states that the Elk Grove Police Department has approximately 207 staff positions, with 131 sworn police officers and 77 non-sworn management, administration and technical positions.

As of 02/07/2016, EGPD staffing consists of 207.5 staff positions, 129.5 sworn positions and 78 non-sworn positions.

Additionally in this section, the Draft EIS (page 3.10-8 and 3.10-9) states that the EGPD Communication Center answers an average of 186,000 emergency and non-emergency calls annually and that in the 2012-2013 fiscal year 97,068 calls for service were received with 52,266 resulting in a unit being dispatched. For the same period, EGPD's response time to top priority calls (from call to dispatch to arrival on scene) was five minutes and 57 seconds.

Updated statistics for the calendar year of 2015 show that the EGPD Communication Center answered 154,623 emergency and non-emergency calls. During the 2015 calendar year 98,098 calls for service were received with 43,836 resulting in a unit being dispatched. EGPD's response to top priority calls was 5.8 minutes for 2015.

2. **Section 4.7.6 Alternative F – Casino Resort at Mall Site**

The Draft EIS (page 4.7-55) under the heading "Social Effects" states that the social impacts including pathological and problem gambling, and crime, would be similar to those of Alternative A (Galt site), since Alternative F is of the same size and scope. Alternative A discusses social effects as it relates to the Galt location (page 4.7-21). The subsection "Crime" (page 4.7.22 through 4.7-27) discusses the impact that the proposed Casino might have on crime in the community of Galt.

Based on an analysis detailed in Appendix N, the Draft EIS estimates a projected annual increase of 461 law enforcement calls for service and 125 arrests. Projected direct costs of these increases were determined by both the 2014-15 Galt Police Department annual budget of \$5,667,560 (page 4.7-24 and 4.7-25) and the 2014 annual arrest records of the City of Galt which resulted in 949 arrests (page 4.7-25 and 4.7-26).

Further information would be needed to determine a projected annual increase in calls for service and arrests specific to the Elk Grove location, based on EGPD's 2014-15 annual budget of \$35,458,468 or the 2015-16 budget of \$36,582,714, and EGPD's arrest records of 2098 arrests in 2014 (CJSC) or 2500 arrests in 2015 (EGPD Records).

3. Section 4.10.6 Alternative F – Casino Resort at Mall Site

The Draft EIS (page 4.10-26) under the heading "Law Enforcement" states that law enforcement services would be provided by the Sacramento County Sheriff's Department and/or the City of Elk Grove Police Department. Absent an MOU between the agencies, all law enforcement services would be provided by EGPD.

4. Section 5.10.3 Law Enforcement

The Draft EIS (page 5.27 and 5.28) discusses the implementation of mitigation measures to minimize potential impacts related to law enforcement services. Subsection "P" states that "prior to operation, the Tribe shall enter into agreements to reimburse the City of Elk Grove Police Department for quantifiable direct and indirect costs incurred in conjunction with providing law enforcement services."

Further discussion would be needed to determine mitigation measures afforded to the City by the Tribe, prior to the construction of the casino. If additional officers need to be hired by EGPD so that the City can continue to provide its existing level of service to the community, the hiring and training process can be lengthy and EGPD would need appropriate time to accomplish this.

Interoffice Memorandum



January 28, 2016

Date

Laura Gill, City Manager

To

Farhad Iranitalab, TE

From

Wilton Rancheria Draft EIS Review

Subject

I have reviewed the traffic study prepared for this Project. I offer the following comments and considerations:

1. Page 3.8-2 & 3 (Transportation/Circulation):
 - a. The description of Grant Line Road is not current as improvements to a 4-lane facility have been completed to Waterman Road. Additionally, the railroad overcrossing is complete.
 - b. The description of Kammerer Road is not correct. The consultant should be referred City's General Plan Circulation Element as amended March 2015. Also, distinction needs to be made between the Capital SouthEast Connector and City improvements. A follow up with Public Works and Connector staff would be appropriate.
 - c. No description of Promenade Parkway is provided. This is a major road and the primary access for Alternative F.
 - d. In the Freeway Facilities discussion, reference is made to Elk Grove Road. The correct name is Elk Grove Boulevard.
2. Table 3.8-4 provides a Level of Service ("LOS") rating for existing conditions at various intersections in and around the various project alternative locations. For the intersection at Grant Line Road and Sheldon Road, was this measurement before or after completion of the signalization project that the City recently completed? If it is before, this may impact the traffic analysis.
3. Table 3.8-5 lists LOS ratings for existing conditions along various roadway segments. Is it correct that the measurements for Grant Line Road are from prior to the City's project to grade-separate the segment from East Stockton to Waterman Road? Updated measurements may be necessary to fully understand the project impacts.
4. Section 5.8, Transportation Mitigation
 - a. Recommend that fair share traffic mitigation payments be made prior to the start of construction of the Project (including any related roadway improvements completed by the Tribe), not solely prior to the road improvements. If the improvements are not being completed by the Tribe (as described in the first paragraph), then the local agency collecting the mitigation needs the flexibility to have the funds on hand to combined with other traffic impact mitigation payments

from other projects to deliver the improvements in the most efficient manner possible.

- b. Mitigation F – this agreement should also include the City for alternatives D, E, and F.
- c. Mitigation O (Grant Line Road/Wilton Road Intersection) – Impacts from this need to be further analyzed. Some conversation has occurred through the Connector project to realign Wilton Road with Pleasant Grove School Road to create a common 4-way intersection, rather than the existing off-set.

Interoffice Memorandum



January 28, 2016

Date

Laura Gill, City Manager

To

Darren Wilson, PE, Development Services Director

From

Wilton Rancheria Draft EIS Review

Subject

The following are my comments on this document:

1. Water Supply (Sections 2.7.2, 4.10.6, 4.15.8, 5.10.1 and Appendix I):
 - a. These sections repeat the statement that “SCWA has capacity to meet anticipated demand for domestic water use under Alternative F,” however, Appendix I only provides the demand calculations for the alternative but does not actually analyze if SCWA’s distribution system has the capacity or not within the service area. Therefore, it is unclear what the actual impacts to SCWA’s system will be as a result of this alternative.
 - b. Section 5.10.1 provides a broad measure (i.e. service agreement) for mitigating off-site options or improvements without identifying the actual, specific impacts and associated improvements necessary to mitigate those impacts.
 - c. Appendix I (page 24) states that “(SCWA’s) distribution lines are more than capable of delivering the daily water demand associated with Alternative F.” However, information or analysis supporting this statement is not presented in the document.
2. Wastewater (Sections 2.7.2, 4.3.6, 4.10.6, 4.15.8, 5.10.1 and Appendix I):
 - a. These sections provide the wastewater demands for Alternative F and state that there is available capacity to meet these demands at the SRCSD WWTP without analyzing and identifying the impacts to the system in between (i.e. distribution and transmission systems, the Promenade Mall/Sterling Meadows Sewer Lift Station, and other facilities).
 - b. Section 5.10.1 provides a broad measure (i.e. service agreement) for mitigating off-site options or improvements without identifying the actual, specific impacts and associated improvements necessary to mitigate those impacts.
 - c. Appendix I addresses wastewater demands for Alternative F, but states (on page 37) that “there is insufficient information available publicly for (the engineer) to perform an independent capacity study.” It continues to read that “a capacity study will be required...to confirm if upgrades will be required.” This document should identify the specific impacts and associated upgrades necessary to mitigate those impacts.

Interoffice Memorandum



January 28, 2016

Date

Laura Gill, City Manager

To

Jean Foletta, Transit Manager

From

Wilton Rancheria Draft EIS Review

Subject

The following are my comments on this document:

1. Section 3.8.3 should be updated to clarify the status of e-tran services in this area. Specifically, the EIS should acknowledge the presence of bus shelters along Promenade Parkway but that no active transit service is currently operating. The EIS should go on to state that, based upon the forthcoming Comprehensive Operational Analysis, transit service would be initiated once retail and entertainment development occurs.
2. There are no references in Section 3.8 to the planned extension of fixed transit service into the City and to the Mall site. These improvements have been identified in Regional Transit's planning and the City's General Plan for some time.
3. The Traffic Study and Section 4.8 of the EIS describe the volume of trips generated by the proposed facility. However, there is no analysis on the number of trips that could occur through transit ridership rather than conventional automobiles. It would be helpful to understand the extent of transit ridership to and from the facility (whether users or employees), so that transit service can be adequately planned and budgeted. Further, it may be more efficient for these services to be provided by e-tran, rather than a shuttle bus operated by the Project as described on page 247 of the Traffic Study.
4. There appears to be a disconnect between the Traffic Study and the mitigation measures presented in the EIS. Specifically, page 247 of the Traffic Study calls for the establishment of a shuttle service between the Project and points within the City, or the establishment of other services in cooperation with e-tran. This is not identified as a mitigation measure in Chapter 5 of the EIS and should be corrected. An additional solution that is not mentioned is the extension of fixed transit to the Project site, which would provide service north into Sacramento.

Interoffice Memorandum



January 28, 2016

Date

Laura Gill, City Manager

To

Heather Neff, Integrated Waste Manager

From

Wilton Rancheria Draft EIS Review

Subject

The following are my comments on this document:

1. Page 3.10-7 – Republic serves residential customers and the City. Commercial users may be served from Republic or one of the other approved commercial haulers. See City website for more information. The City has a contract with Forward Landfill in Stockton for residential waste. Commercial waste goes to a number of different locations depending upon which facilities the 14-registered haulers are using (it is up to them to choose). The list of facilities they use is fairly extensive.
2. Section 4.10.6, Solid Waste – The assumption that construction and demolition (C&D) and operation waste would be hauled to Kiefer Landfill is not accurate. See previous comments. Consideration in the analysis should be made for alternative locations for waste disposal.
3. Page 4.10-26 notes that the Mall site “is located within the service boundaries of the County DWMR”. The Mall site is within the City of Elk Grove and is therefore in the service boundaries of Elk Grove where service is provided to commercial customers by private hauling companies that must be registered with the City.
4. Page 4.15-50, Solid Waste – again, there is no guarantee that solid waste from the project would go solely to Kiefer. Consideration in the analysis should be made for alternative locations for waste disposal.
5. Section 5.10.2, Solid Waste - For Alternative F, the Project should be required to comply with the City’s C&D Debris Reduction, Reuse, and Recycling regulations (EGMC Chapter 30.70) and the City’s mandatory business recycling requirements (EGMC Chapter 30.60). Doing so will help to ensure that waste generated from the facility is reduced to the extent feasible, which is an improvement for the environment.