SECTION 2.0
ALTERNATIVES

2.1 INTRODUCTION

This section describes the alternatives that are analyzed within this Draft EIS. These alternatives include four development alternatives, as well as the No Action Alternative. Consistent with CEQ guidelines (section 1502.14), this section includes a detailed discussion and comparison of the alternatives analyzed in this Draft EIS.

Alternatives have been selected to meet the Purpose and Need as described in **Section 1.2**. Any one of the four development alternatives would be developed on the project site if chosen and approved by the BIA and NIGC, with exception of Alterantive D which would only require approval of trust acquisition from the BIA All four of the development alternatives include placing 228.04± acres into Federal trust status.

2.2 DESCRIPTION OF PROJECT ALTERNATIVES

2.2.1 ALTERNATIVE A –PROPOSED CASINO AND HOTEL

Alternative A consists of two phases of development as shown in **Table 2-1**. Phase I includes the following components: (1) placing 228.04± acres into Federal trust status; (2) approval of a Gaming Management Contract; and (3) development of a 120,000 square-foot casino complex and associated facilities. Phase II includes the addition of a 250-room hotel complex and a 30,000 square-foot event/conference center. Information below describes the development standards that would be incorporated into both phases and components of each phase including parking, water and wastewater facilities, site drainage, fire protection, and law enforcement.

DEVELOPMENT STANDARDS

Phases I and II

The Tribe would adopt the currently held standards of the applicable federal building codes and the Uniform Building Code, including all uniform fire, plumbing, electrical, mechanical, and related codes. These standards would be followed when constructing the casino during Phase I and the hotel and convention center during Phase II. In addition, the development would comply with the Federal Americans with Disabilities Act, P.L. 101-336, as amended, 42 U.S.C. §12101, *et seq*. The Tribe would develop the project consistent with the above standards, including but not limited to the following provisions:

- Development will be issued a certificate of occupancy by the Tribe prior to occupancy;
- The Tribe will adopt and comply with standards no less stringent than state public health standards for food and beverage handling;
- The Tribe will adopt and comply with standards no less stringent than Federal air quality, water quality, and safe drinking water standards;
- The Tribe will adopt and comply with standards no less stringent than Federal workplace and occupational health and safety standards;
- The Tribe will adopt Tribal codes to assure compliance with applicable Federal laws regarding public health and safety; and,
- The Tribe will make reasonable provisions for adequate emergency, fire, medical, and related relief and disaster services for patrons and employees of the gaming facility.

TABLE 2-1
ALTERNATIVE A – DUAL PHASE CASINO USE AREAS/ HOTEL AND EVENT CENTER

Area	Number	Square Footage
PHASE I		
Casino		
Slot Machines	2,000	50,000
Table Games	40 Tables	15,000
Back of House Service and Support Areas		20,000
Food/Beverage Area (Itemized Below)		20,000
Buffet	250 Seats	
Specialty Restaurant	100 Seats	
Coffee Bar	10 Seats Plus Counter	
Sports Bar	50 Seats	
Public/Misc. Area		15,000
	Phase I Total	**120,000**
PHASE II		
Hotel	250 Rooms	166,500
Event and Convention Center	1,200 Seats	30,000
	Phase II Total	**196,500**
FULL BUILD-OUT		**316,500**

NOTE: All figures are approximate.
SOURCE: KKE, 2004; AES, 2004.

Phases I and II would also incorporate built-in fire protection features including the following:

- The casino, hotel, and event center will be constructed as Type I non-combustible, fire-resistant structures as defined by the applicable building code.
- The casino, hotel, and event center will be equipped with a hydraulically calculated automatic sprinkler system. The automatic sprinkler system will be designed to comply with the applicable building code.
- An automatic fire detection and alarm system will be located throughout the buildings. Operation of the detection devices will trigger the emergency voice alarm-signaling system.

PHASE I

Land Trust Action

Phase I of Alternative A consists of conveying 12 parcels, comprising 228.04± acres, into Federal trust status on behalf of the Tribe (**Table 2-2)**. The fee-to-trust acquisition would be made in accordance with the procedures set forth in 25 CFR Part151. The Tribes' fee-to-trust application provides detailed information on the land being taken into trust. The regulations in 25 CFR Part 151 implement Section 5 of the Indian Reorganization Act (IRA), codified at 25 USC §465. Section 5 of the IRA provides the Secretary of the Interior with authority to acquire lands in trust status for tribes and individual Indians. Since the Tribe is seeking to acquire off-reservation land in trust for gaming purposes, compliance with Section 20 of the Indian Gaming Regulatory Act (IGRA) must be included as part of a Bureau of Indian Affairs (BIA) Part 151 fee-to trust application. The process includes an analysis that assesses potential effects on the surrounding community. The process also includes consultation to determine the effects and the overall benefit the project would have for the Tribal Government and local governments based on the proposed use. If the BIA determines that the proposal meets statutory requirements and the benefits outweigh the potential negative effects, it may approve the Tribe's application and take the proposed lands into trust for the Tribe

Management Contract

Congress enacted the IGRA of 1988 (25 U.S.C. § 2701 *et seq*.) with the stated purpose of providing a statutory basis for the operation and regulation of gaming on Indian Lands by Indian tribes. As part of its regulatory function, the NIGC, which was established under IGRA, is charged with the authority to approve Development and Management Contracts between Indian Tribes and outside management groups. As part of its review of the contract, the NIGC will look at the overall effect the project will have on human health and the environment, along with the scope and terms of the contract. In order to approve a contract, the NIGC must determine that the contract will not violate the law and that the contract meets certain requirements relating to term,

management company payment, and protection of tribal authority. The NIGC also conducts extensive background checks of the management company's key personnel.

TABLE 2-2
TRUST PARCELS

Parcel #	Size (acres)	Assessor's Parcel #
1	137.78	08-110-009
2	7.86	08-110-022
3	60.00	08-110-026
4	0.64	10-200-003
5	2.68	10-200-004
6	1.65	10-200-006
7	1.19	10-200-007
8	0.53	10-200-008
9	0.81	10-200-009
10	1.56	10-200-010
11	1.22	10-200-011
12	12.12	08-110-021
Total Acreage	**228.04**	

SOURCE: AES 2007.

The NIGC provides regulatory oversight on tribal gaming operations to ensure the safety of the operations and integrity of the games. As part of this regulatory function, the NIGC has promulgated minimum control standards for the operation of a tribal gaming facility. Under 25 C.F.R. §573.6(a)(12), the NIGC can issue an order of temporary closure of all or part of an Indian gaming operation if "[a] gaming operation's facility is constructed, maintained, or operated in a manner that threatens the environment or the public health and safety, in violation of a Tribal ordinance or resolution approved by the Chairman under part 522 or 523 of this chapter."

The proposed contract between the Tribal Government and a management company would assist the Tribe in obtaining funding for the development of the proposed Tribal gaming complex. Once the facility becomes operational, the management company would have the exclusive right to manage day-to-day operations of the hotel and casino complex. The management company would be required to comply with the terms of IGRA and NIGC's regulatory requirements relating to the operation of the Tribal gaming facility. The Tribe would maintain the ultimate authority and responsibility for the development, operation and management of the casino pursuant to IGRA, NIGC regulations, a Tribal Gaming Ordinance and a Tribal/State Compact.

Casino Complex

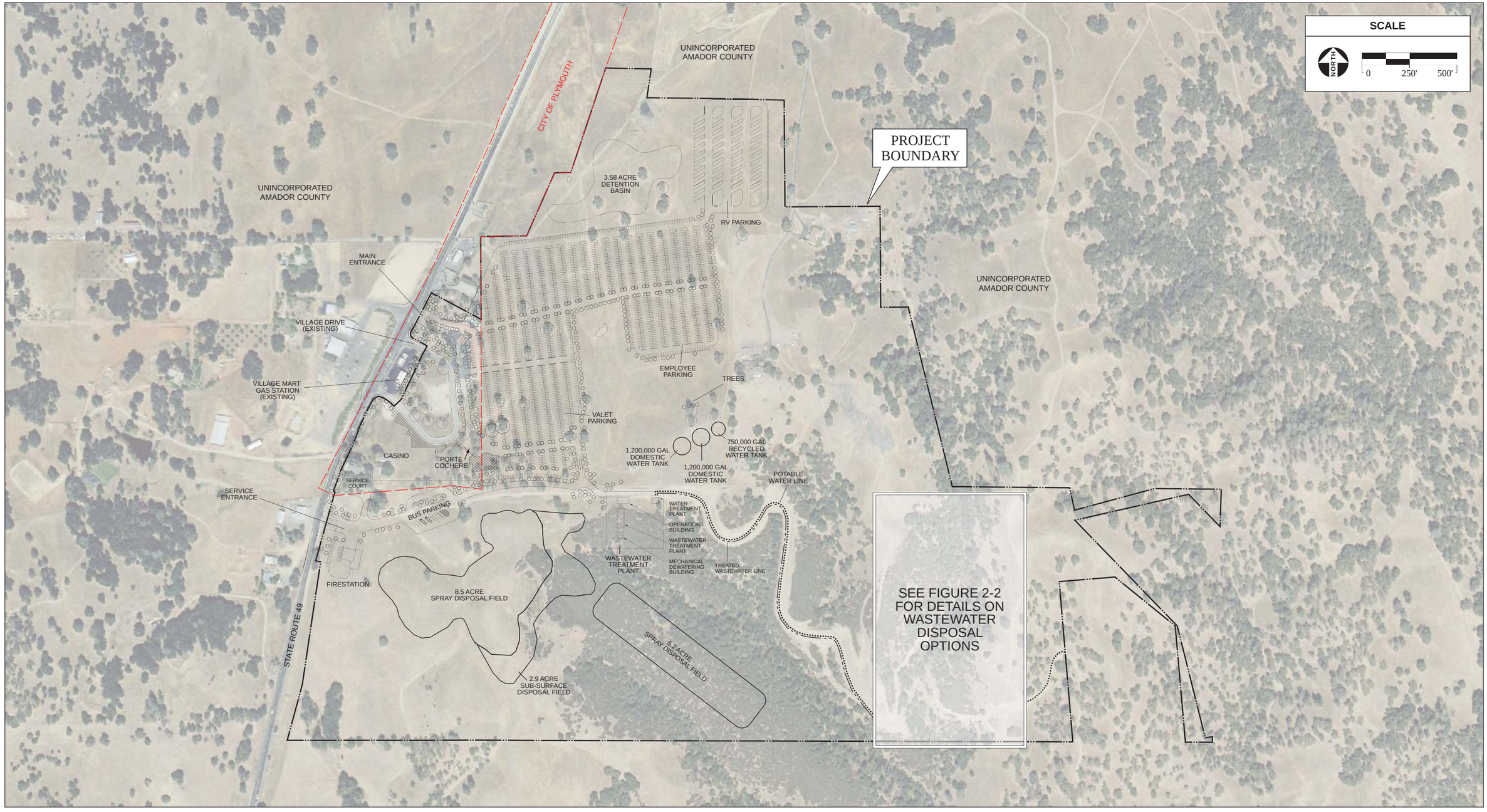
The casino complex would be located on Parcels #3 through #11 and would include: food and beverage services, small retail shops, administrative offices for gaming-related tribal activities, and the main gaming hall (**Table 2-1**). The site plan for development of Phase I is presented in **Figure 2-1**. An architectural rendering of the conceptual building elevation is presented in **Figure 2-2**.

The gaming facility would include the casino floor, food and beverage areas, back of house and support services, and public/miscellaneous areas. Beverages and food would be served within a planned 250-seat buffet, a 100-seat specialty restaurant, a 50-seat sports bar, and a 10-seat coffee bar with service counter. Other components of the gaming facility would include meeting space, guest support services, offices, and security area. The casino floor area would provide 65,000 square feet for gaming purposes. Alcohol would be served throughout the casino, including the gaming floor. Accordingly, patrons would be required to be 21 years old or over to enter the casino. The Tribe would adopt a Responsible Alcoholic Beverage Policy, which would include, but not be limited to, requesting identification from patrons and refusing service to those who have had enough to drink. Smoking would be permitted within the casino; however, non-smoking sections would be provided.

Site Access and Parking

Two driveways off SR 49 would provide access to the casino complex (**Figure2-1**). The northern driveway would provide the main access to the casino's porte-cochere and parking area. The southern driveway would provide a service entrance and secondary access to the parking area. Village Drive, an existing loop road, runs from the north side of the Village Mart/Shell gas station to the Shenandoah Inn and around to the south side of the gas station, connecting both ends of the roadway with SR 49. Phase I includes the removal of the Shenandoah Inn, leaving the gas station and Village Drive. Village Drive would not provide connections to the porte cochere or casino parking area or else be utilized by the casino in any way. Public use of Village Drive and the existing access to the gas station would remain with the development of this alternative.

Phase I of Alternative A would provide a total of 3,038 parking spaces on-site. The main parking area would be located east of the casino on Parcel #3 and would provide valet parking spaces and self parking spaces. A secondary, smaller parking area would be located southwest of the main casino entrance. Both parking lots would provide 2,987 parking stalls for personal automobiles. The smaller parking area would provide additional self parking spaces and also incorporate a bus loading area. An RV parking area located in the northern portion of the project site would provide 40 additional spaces. An access driveway from the northeast corner of the main



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002 ; KKE Architects, 2004; HydroScience Engineers, 2004; AES, 2005

Figure 2-1
Alternative A (Phase I) Site Plan

SOURCE: KKE Architects, 2004; AES, 2005

Figure 2-2
Alternative A (Phase I) Architectural Rendering

parking lot would provide access to the RV parking area. No hook-up services (i.e. electricity, water, septic) would be provided to the RV parking area. Approximately 11 bus parking spaces would be provided just south of the main parking area. The roadways and parking lots would be equipped with typical lighting standards providing downcast lighting for visibility and security purposes. Lighting standards provided near SR 49 would be of a vintage style consistent with lighting used along Main Street in the City of Plymouth. Noise attenuation walls or earthen berms would be constructed along the western edge of the main parking area and along the western edge of the service court to shield residences to the northwest and southwest from any potential noise.

Water Demand and Supply

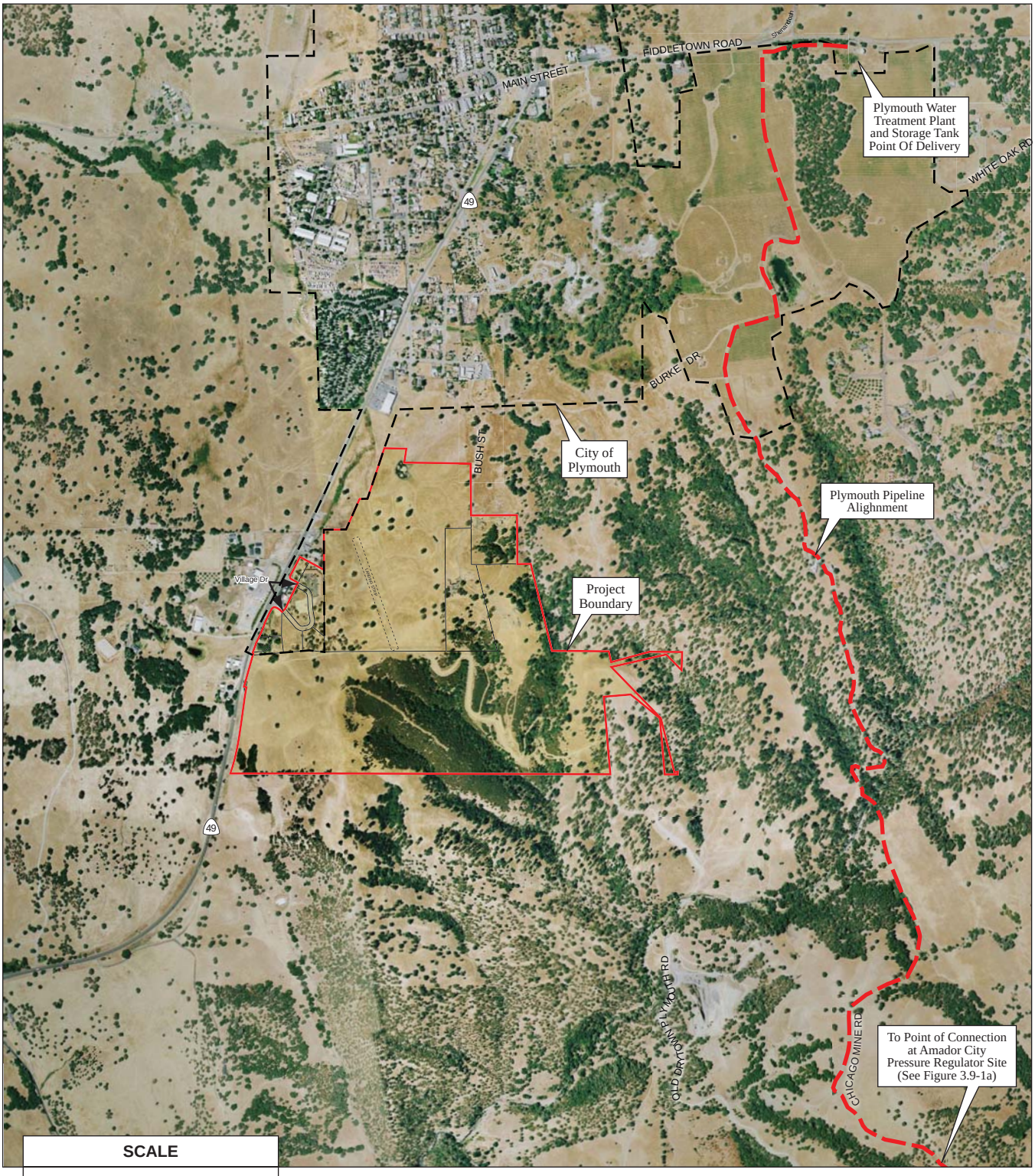
Based upon estimates presented in the attached Water and Wastewater Feasibility Study (**Appendix B**), operation of Phase I of Alternative A would result in an average daily water demand of 150,200 gallons per day (gpd). Landscape irrigation would require an additional 10,000 gpd for a recommended water supply of 160,200 gpd for Phase I. If recycled water were used within the casino complex and for landscape irrigation, potable water demand would be reduced by 52,200 gpd, to 98,000 gpd. Water demand for Phase I would be met through a mixture of water supply sources. To provide Phase I of Alternative A with an adequate water supply, the following two options have been developed:

Option 1

Under Option 1, the total water demand for Phase I, with or without the use of recycled water, would be met by the City of Plymouth's municipal water supply. The use of the City's water supply will become a viable option when the City and Amador Water Agency (AWA) complete the planned Plymouth Pipeline Project. Construction of this pipeline is planned to begin in 2008, with an anticipated operation schedule to begin by the end of that year. The pipeline project is within the City of Plymouth's Sphere of Influence (SOI) and falls under the City's (year) General Plan and would serve to meet the water demand estimates for the year 2025. The new pipeline would also provide water for emergency fire flows as well as provide for a reserve summer demand source (City of Plymouth, 2006). As shown in **Figure 2-3**, the Plymouth pipeline will deliver water supplies to the existing City of Plymouth Water Treatment Plant, which is located approximately 1.5 miles from the project site, along the eastern side of the City. Alternative A would connect to existing water lines in the vicinity of the project site. Existing lines extend to the project site along SR 49 from the north. From SR 49, a 10-inch line with a capacity of 2,000 gpm loops around Village Drive, providing services to existing facilities along the roadway (Selby Beck, personal comm., 2007).

Option 2

Water supplied under Option 2 during Phase I would be provided by groundwater wells and trucking services. Within **Figure 2-4** two groundwater wells are located on the project site



SOURCE: Airphoto USA Aerial Photograph, 7/1/2006; AES, 2007

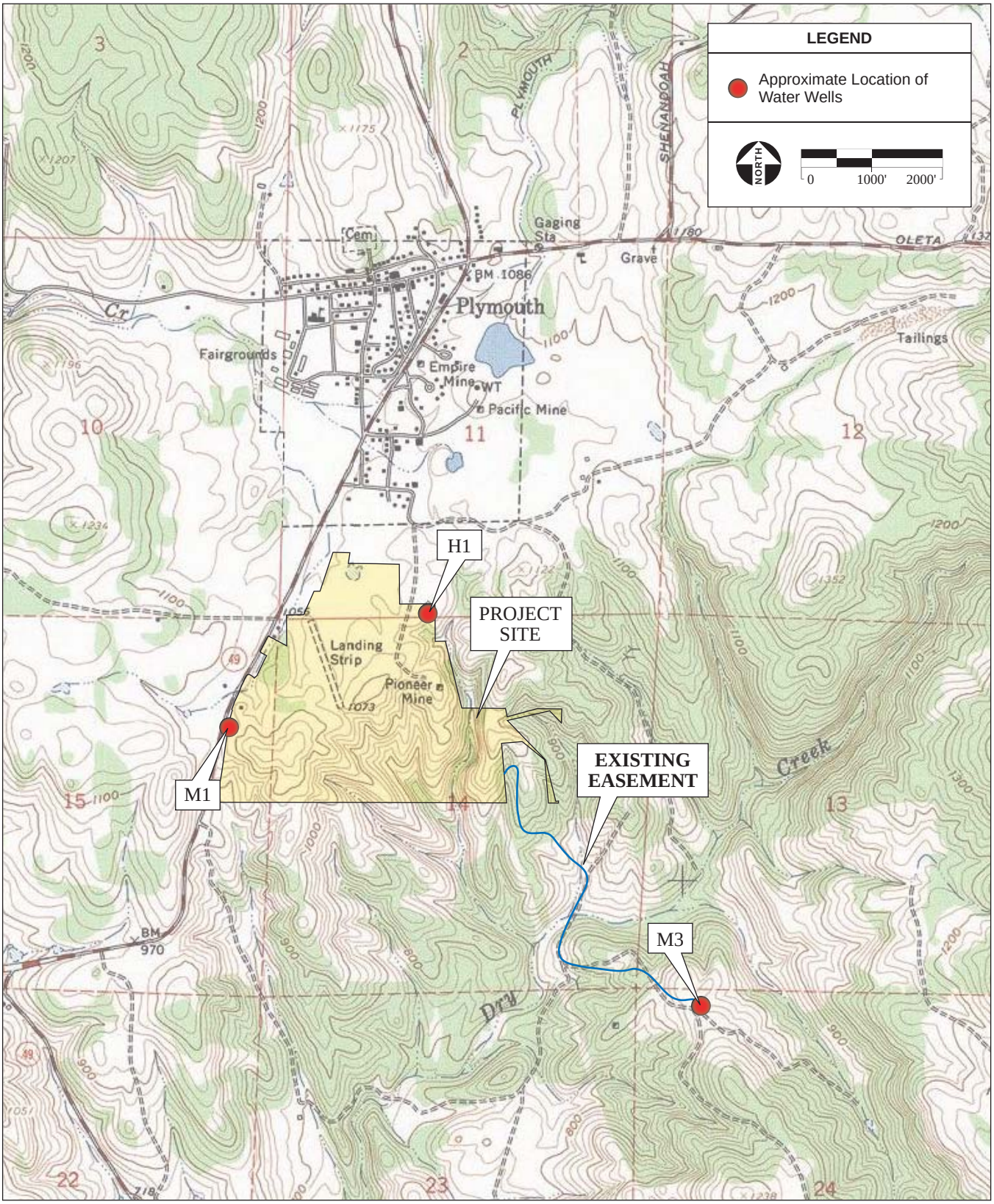
Figure 2-3
City of Plymouth Water Supply – Option 1

(designated as M1 and H1), and one well is located adjacent to the project site (designated as M3). Based on pumping tests (**Appendix B**), the total sustained yield of the groundwater wells is estimated to be approximately 119,520 gpd. The three wells would be pumped in rotation to allow the groundwater reservoirs to recharge between pumping periods. Water from the off-site well would be delivered to the site via an existing pipeline located within a 60-foot wide easement.

Alternative A plans include an on-site reverse osmosis water treatment plant to be constructed so that potable water supplied to the casino and hotel from groundwater wells meets all Safe Drinking Water Act (SDWA) standards. Groundwater Treatment would reduce elevated levels of iron, manganese, and Total Dissolved Solids (TDS) identified in the source wells. The water treatment plant would be constructed east of the wastewater treatment plant (**Figure 2-1**). The reverse osmosis system involves passing the potable water stream through sheets of specialized semi-permeable membranes that remove minerals, salts, and other contaminants. The minerals and salts are captured as concentrated brine; approximately 10,000 gallons of brine would be produced per day. The production of brine would result in a net loss of potable water for use at the casino. A 15,000-gallon storage tank would be installed to store the brine prior to being trucked to a treatment facility. The remaining water demand, including water loss from brine production, would be met by trucking in water supplies, when applicable.

During Phase I, 70-percent of demand can be met by groundwater wells (estimated well yield minus loss due to brine production within the water treatment plant). The remaining 30-percent of the net water demand would be provided by water delivery. A will serve letter has been received from Aero Pure Water for potable water delivery (**Appendix D**). Water from the wells and from the tanker trucks would be pumped to two 1.0 million gallon water tanks located to the east of the main parking lot. These tanks would provide a total of 2.0 million gallons of storage capacity to provide adequate reserve water supply for peak days and adequate water supply and pressure for fire flow (**Appendix B**). The steel water storage tanks are approximately 60 feet in diameter by 30 feet high and would be painted in earth tones and screened by trees and other landscaping to blend in with the natural surroundings.

With the use of recycled water, a development option discussed below under wastewater treatment and disposal, 101-percent of the remaining water demand for Phase I would be met by the groundwater wells. Water trucking could be used to initially assist filling the one million gallon storage tanks, after which the groundwater wells could be relied upon for potable water needs.



SOURCE: "Amador City, CA" USGS 7.5 Minute Topographic Quadrangle, Sections 11, 14, & 15, T7N, R10E, Mt. Diablo Baseline and Meridian; AEG, 2004; AES, 2005

Figure 2-4
Groundwater Wells and Water Supply Easement

Wastewater Treatment and Disposal

The operations of Phase I of Alternative A would result in a wastewater generation rate of 130,600 gpd (**Appendix B**). Wastewater generated by Alternative A would be treated by an on-site wastewater treatment plant (WWTP) to be developed by the Tribe. The WWTP would treat wastewater produced by the project site facilities and would not service additional flows beyond those identified for this alternative. To allow for peak flows and redundant capacity for full build-out, the WWTP would be constructed to provide an average day capacity of 200,000 gpd.

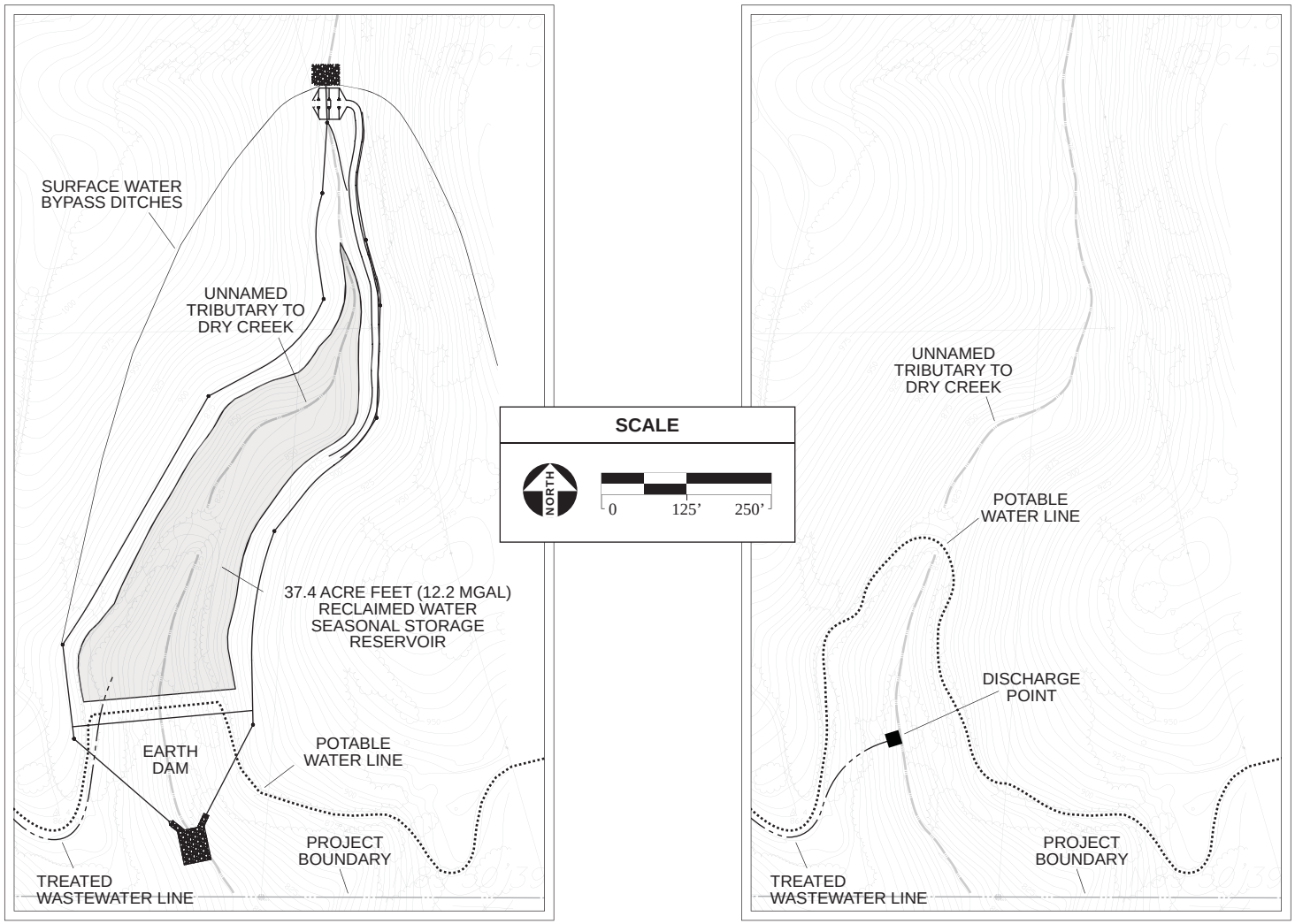
Wastewater would be treated in the WWTP to a level that meets California Title 22 disinfected tertiary recycled water quality standards. One hundred percent of wastewater flows would be treated to this level and make the water suitable for all recycled water uses and effluent disposal strategies identified for the project.

Wastewater would be treated using a membrane bioreactor (MBR) system. The MBR system is a state-of-the-art, advanced wastewater treatment process that utilizes membrane technology, comparable to that used for production of potable water. Biosolids produced by the wastewater treatment plant would be dewatered and trucked off-site for disposal at a licensed landfill. Refer to **Appendix B** for further discussion on the design of the WWTP. The Tribe may utilize recycled wastewater for landscape irrigation and toilet flushing within the casino to reduce the overall water demand, as well as to reduce the wastewater disposal requirements of the project. Treated water to be used for irrigation and toilet flushing would be stored in a 750,000 gallon recycled water tank prior to use. This recycled water tank would assure that an adequate reserve capacity is available and recycled water does not mix with potable water. In accordance with Title 22, project facilities would be dual-plumbed to provide separation of potable water and recycled water lines.

There are two options for disposal of treated wastewater (**Figure 2-5**). Option 1 would utilize a combination of sprayfields, ground disposal, and reservoir storage. Option 2 would consist of a combination of surface water discharge, sprayfields, and ground disposal.

Option 1

Under Option 1, treated wastewater would be discharged in the summer through landscape irrigation, sprayfields, and subsurface disposal (**Figure 2-5**). During the winter, treated wastewater would be stored through the winter months in an on-site reservoir until the following summer. The on-site reservoir would impound approximately 37.4 acre-feet of tertiary treated wastewater with an approximately 75-foot high earth dam. The reservoir would be constructed in compliance with the Federal Coordination Council on Science and Engineering Technology's "Federal Guidelines for Dam Safety" and general industry standards. The design of the reservoir shall be prepared by a registered professional engineer and reviewed by the BIA Pacific Region Safety of Dams Officer prior to construction. Additionally, the reservoir construction would



WASTEWATER DISPOSAL OPTION 1
SEASONAL STORAGE RESERVOIR

WASTEWATER DISPOSAL OPTION 2
SURFACE WATER DISCHARGE POINT

SOURCE: HydroScience Engineers, 2004; AES, 2005

Figure 2-5
Wastewater Disposal Options for Alternatives A and B

follow recommendations listed in **Appendix E**, which are hereby incorporated into the project description. This option would require that a National Pollution Discharge Elimination System (NPDES) permit be obtained from the USEPA. The seasonal storage reservoir would not be used for storage of untreated wastewater. A fence would enclose the reservoir to prevent people from entering the reservoir.

Option 2

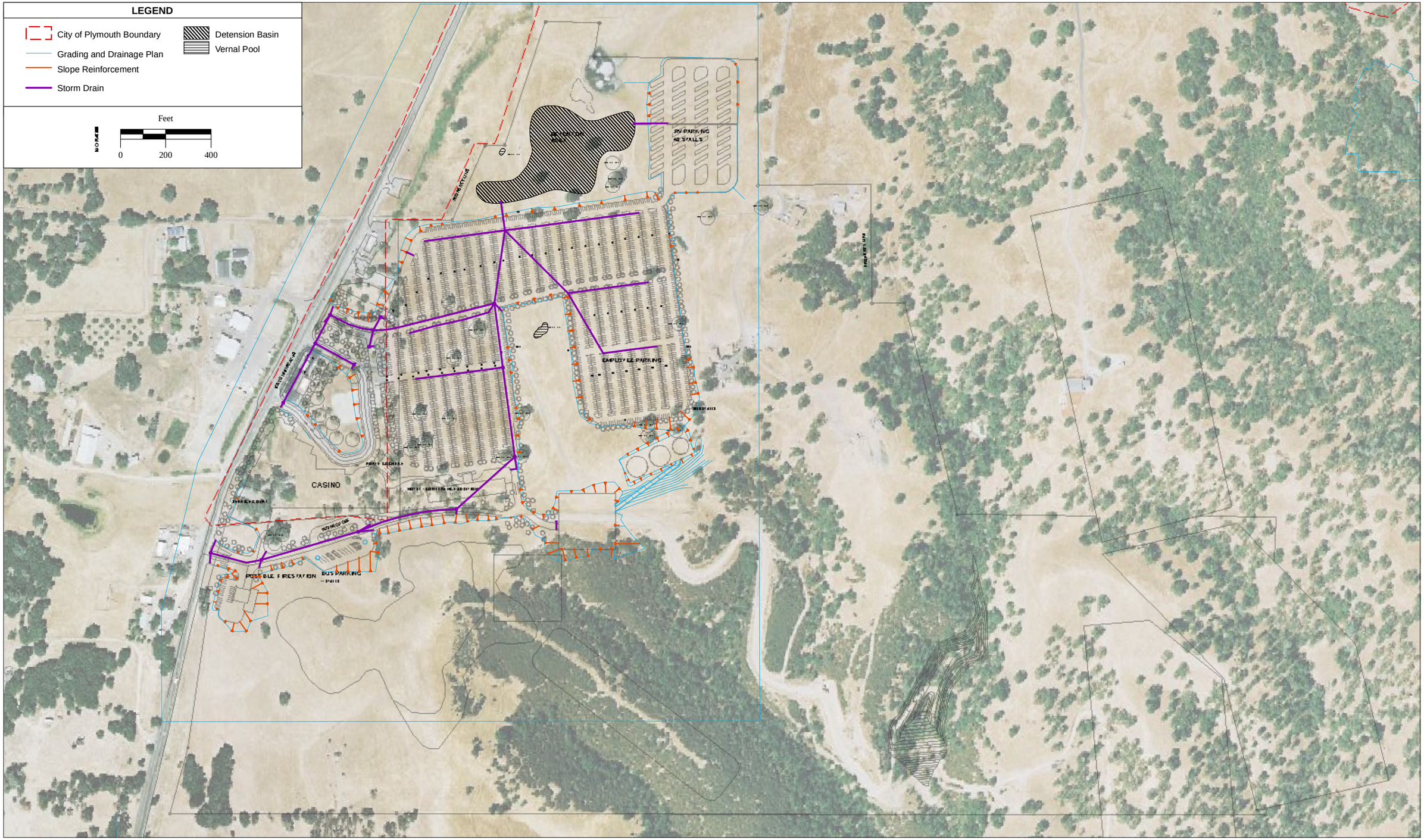
With Option 2, treated wastewater would be disposed of during the summer through landscape irrigation, sprayfields, and subsurface disposal and during the winter through surface water discharge. Surface water discharge would occur on the project site to an unnamed tributary of Dry Creek. This option would require a NPDES surface water discharge permit from the USEPA. Depending on the conditions of the NPDES permit, year-round discharge to surface waters may occur. If year-round surface water discharge occurs, other disposal methods would be limited to landscape irrigation during the summer months. Reuse of treated wastewater in the casino and hotel toilets and cooling system could be maintained under this option to reduce the amount of wastewater requiring disposal. Treated wastewater would be monitored to determine that USEPA requirements are met. A 3-inch diameter pipe will transport the treated wastewater from the wastewater treatment facility to the discharge site, which would include a velocity dissipation structure to prevent erosion (**Figure 2-5**).

Landscaping and Utilities

Landscaping features would preserve existing trees and vegetation where possible and include the planting of non-invasive plant species. Landscaping areas would be limited to the vicinity of the casino, parking areas, and the water and wastewater treatment facilities. The incorporation of these landscaping features would blend the development in with the natural surroundings, and assist in breaking up and softening the massing of the proposed structures. All new and existing utility lines (power lines, cable lines, phone lines, etc.) would be placed underground, as part of the development of Alternative A.

Site Drainage

Stormwater runoff generated during the operation of the casino would be conveyed by a combination of open channels, storm drains, and culverts. A drainage plan has been developed for Alternative A, and is included as **Appendix G** of this EIS (**Figure 2-6**). The drainage plan includes the use of several features designed to reduce surface runoff volumes and filter surface runoff prior to release into the existing on-site natural drainage channels. The drainage plan would be implemented prior to the operation of Phase I and would include all provisions to provide the necessary conveyance and treatment capacities in response to additional runoff generated when operation of Phase II commences. Runoff from the project site would be directed into vegetated swales or through inlets from buildings or curb inlets on roadways into storm drain pipes. Prior to release into the open channels that lead to Little Indian Creek (tributary to the



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; American Aerial Mapping, 2003; Claybar Engineering, 2004; AES, 2007

Figure 2-6
Alternative A - Grading and Drainage Plan

Cosumnes River), runoff would pass through sediment/grease traps that would filter approximately 80-percent of the total suspended solids, such as trash and soil sedimentation, oil, grease and other potential materials that could degrade surface water quality. Vegetative swales would serve as energy dissipaters and filtering mechanisms for runoff generated on-site prior to release into the site drainage channels. The swales provide friction reducing runoff rates, which in turn captures sediment and pollutants before entering the on-site open channels.

A detention basin would be provided on-site to reduce increased peak flows that would result from developing the site. This basin would assure that post development runoff peaks from the operation of Phase I (and Phase II) will not exceed existing peak runoff volumes. The detention of water on-site would reduce potential downstream erosion and water quality effects associated with increased runoff volumes and rates associated with the introduction of impervious surfaces from development. The detention basin would be located to the north of the main surface parking area. All of the proposed facilities would be constructed outside of the 100-year floodplain.

Security/Law Enforcement

Prior to operation of Phase I, the Tribe would employ security personnel to provide surveillance of the casino, parking areas, and surrounding grounds. Security guards would patrol the facilities to reduce and prevent criminal and civil incidents. Security guards would carry two-way radios to request and respond to back-up or emergency calls. Tribal security personnel would work cooperatively with the Amador County Sheriff's Office (ACSO), which provides general law enforcement services to the City of Plymouth on a contract basis. The ACSO has jurisdiction to enforce State criminal laws on the proposed trust lands to the extent authorized by Public Law 83-280 (18 U.S.C. § 1162, 28 U.S.C. § 1360).

Fire Protection

To provide fire protection and emergency medical services for Alternative A, the Tribe would develop and staff an independent fire station on the project site prior to the operation of Phase I. The fire station would be located immediately south of the southern driveway, which would provide ingress and egress to SR 49. At a minimum, the on-site fire station would be equippedwith a 1,750-gpm quint (combination fire engine and ladder truck), a 1,500-gpm fire engine with pump capacity and 750-gpm grass fire/foam truck (for wildfire suppression/protection and vehicle fires). All the members of the Tribal Fire Department, including the Chief Officer, would be trained to a minimum level of Fire Fighter I standards as defined in 1001 National Fire Protection Association (NFPA) standard for Fire Fighter Professional Qualifications, Chapter 5, 2002 edition. In addition to being trained professional fire fighters under the 1001 NFPA standard, the members of the Tribal Fire Department will be trained to a Paramedic (advanced life support) level under California licensure to provide First Responder emergency medical services. Under this alternative, it is expected that the Tribal Fire

Station would enter into a mutual-aid agreement with Amador Fire Protection District (AFPD), California Department of Forestry (CDF) and other local fire protection providers. The mutual-aid agreement would provide the terms and conditions under which the parties would respond and assist in calls for aid.

The fire station would include apparatus bays, administrative offices, a conference room, staff rooms, and operation support facilities. Other amenities of the fire station would include a staff parking area, downcast exterior lighting, and landscaping. Water delivery to the fire station would be provided by the on-site water supply facilities. The Tribe has developed a Fire Plan to address the construction and operation of the fire station, as well as the built-in fire detection and suppression features described above (**Appendix F**).

PHASE II

Phase II includes the addition of a 250-room hotel complex and a 1,200 seat event/conference center (**Table 2-1**). For the purposes of this analysis, it is assumed that the hotel-event/conference complex will be developed in the year 2009. **The** site plan for Phase II, with the addition of the hotel and event/conference center, is shown in **Figure 2-7**.

Hotel

During Phase II, the Tribe would construct a 250-room hotel on Parcel #3, directly east of the casino (**Figure 2-7**). The 5-story hotel building would have a total building space of approximately 166,500 square feet. The main casino driveway would provide primary vehicle access to the hotel. An architectural rendering of the hotel and casino is provided in **Figure 2-8**. The hotel would employ approximately 44 additional people. Phase II would increase employment by 94 positions, resulting in total employment of 1,365 employees for the full build-out of Alternative A.

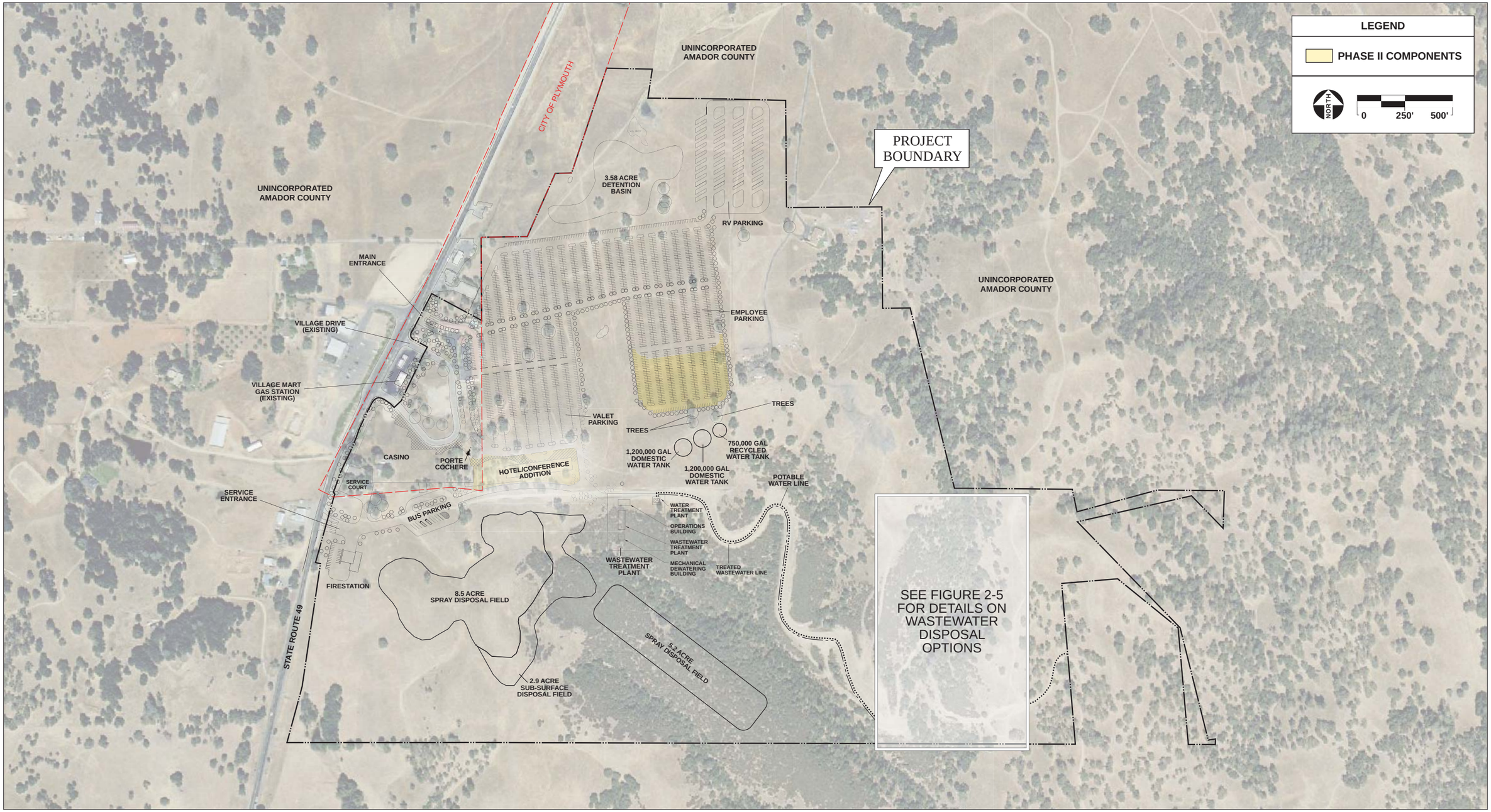
Event/Conference Center

Phase II includes the development of an event/conference center (hereafter, "event center") located between the casino and hotel serving, in part, as a connection between the two facilities. The event center would be a single-story building and occupy approximately 30,000 square feet. Hotel employees would staff the event center.

Phase II Components

Site Access and Parking

Site access would be provided by the service road on the south side of the casino. The main casino parking area would provide parking for hotel guests. A walkway would provide pedestrian access from the casino building to the hotel and event center addition. The lobby of the hotel would be accessible from the southern end of the valet section of the main parking lot.



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; KKE Architects, 2004; HydroScience Engineers, 2004; AES, 2005

Figure 2-7
Alternative A (Phase II) Site Plan

SOURCE: KKE Architects, 2004; AES, 2005

Figure 2-8
Alternative A (Phase II) Architectural Rendering

For Phase II, the southwest portion of the main parking area would be removed to allow for the construction of the hotel and event center (**Figure 2-7**). This loss of parking area would be offset by an expansion of the main parking lot to the south, creating 693 additional self-park automobile stalls (159,000 square feet). The total parking spaces for full build-out of Alternative A, after the development of Phase II, would be 3,731 spaces, including the original 40 RV spaces and 11 bus spaces.

Water Demand and Supply

Phase II would result in an additional water demand of 28,300 gpd, resulting in a full build-out water demand for Alternative A of approximately 188,500 gpd, an increase of approximately 15-percent from the sole operation of Phase I. With the use of recycled water, full build-out water demand would be reduced by 35-percent to 116,700 gpd.

Increased water demand would be met by the option selected during development of Phase I. If Option 1 were selected, the increase in water demands after development of Phase II would be met by the City of Plymouth's municipal water supply. If Option 2 were selected, additional water trucking would be required, as groundwater pumping would already have reached a safe maximum yield.

As discussed under Phase 1, total sustained groundwater yields of the wells is estimated to be approximately 119,520 gpd. Taking into account loss from brine production during water treatment, Phase II would require a total water supply of 200,000 gpd to meet projected demands. Without the use of recycled water, 60-percent of the water supply would be provided by the groundwater wells developed during Phase I. The remaining 40-percent of the net water supply would be provided by water delivery, in accordance with the will serve letter mentioned under Phase I. Water from the additional tanker trucks would be pumped to the two 1.2 million gallon water tanks developed under Option 2. No additional water would traverse through the water treatment plant as a result of the development of Phase II.

With the use of recycled water, 93-percent of the remaining water demand would be met by the groundwater wells. Water trucking would provide the remaining 7-percent of potable water to meet water demands.

Wastewater Generation and Disposal

Operation of Phase II would add 24,000 gpd to the wastewater generation rate of Alternative A, resulting in a full build-out wastewater generation rate of 154,600 gpd. Additional wastewater generated during Phase II would be treated by the on-site WWTP developed by the Tribe during Phase I. This WWTP would treat the additional wastewater produced by the hotel and event center facilities to meet California Title 22 disinfected tertiary recycled water quality standards,

which may or may not be used to off-set potable water demands. As discussed under Phase I, the treatment capacity would already be designed to treat up to 200,000 gpd.

Wastewater disposal methodologies would be the same as that selected for Phase I and would increase by 10,000 gpd after the completion of Phase II. As discussed above, Option 1 would utilize a combination of sprayfields, ground disposal, and reservoir storage and Option 2 would consist of surface water discharge or a combination of surface water discharge and ground disposal.

Landscaping and Utilities

Landscaping features and utility lines for the hotel and conference center would be developed in a similar manner as described under Phase I. All landscaping features would be planted with non-invasive plant species with existing vegetation incorporated into site designs, where applicable. All utility lines would be placed underground.

Site Drainage

Stormwater runoff generated during the operation of Phase II would be conveyed by the system developed during the construction of Phase I. The conveyance and treatment systems of the site drainage facilities would already have the capacity to handle the additional runoff generated after the completion of Phase II. Refer to the discussion under Phase I and **Figure 2-6**.

Security/Law Enforcement

Prior to operation of Phase II, the Tribe would expand the number of employed security personnel to provide appropriate coverage of the newly constructed hotel and event center. When large events are planned at the event center, the tribe will ensure adequate security personnel are present to reduce potential impacts to public safety.

Fire Protection

With the development of an on-site fire station during Phase I, no additional resources would be necessary to respond to potential issues at the hotel and event center. The proposed purchase of a quint, as discussed under Phase I, would provide the necessary ladder capabilities to deal with potential fire and emergency situations involving the five-story hotel building.

OTHER LAND USES

Disposition of Existing Land Uses

The project site is currently developed with four single-family residences and the Shenandoah Inn. The Shenandoah Inn is located on Parcel #5 and two of the residences are located on Parcels #8 and #9 in the western portion of the project site adjacent to SR 49. The remaining two residences are located on Parcels #2 and #12 in the northeastern portion of the project site.

During Phase I the Shenandoah Inn and the residences on Parcels #8 and #9 would be demolished to allow development of the casino, access roadways, and parking areas. The residences on Parcels #2 and #12 would remain intact and in use.

In addition to the existing land uses described above, a landing strip and a mine lift station also exist on the project site. The landing strip is simply a leveled area on Parcel #3. The landing strip is not paved and no structures are associated with it. During Phase I, a portion of the landing strip area would be graded and paved for surface parking. The remaining area would be left undisturbed to protect an adjacent seasonal pond. The landing strip would not be used. The location of the mine lift station on Parcel #1 would not be developed. However, due to the dilapidated condition of the structure and associated safety concerns, a 50-foot buffer would be established with a barrier, such as chain-linked fencing, surrounding the entrance of the mine lift station and any associated appurtenances.

Future Development

No other developments, such as Tribal housing or other commercial facilities, would occur on the project site. The WWTP is designed to provide treatment only for the facilities described above.

2.2.2 ALTERNATIVE B –REDUCED CASINO WITH HOTEL ALTERNATIVE

Alternative B consists of components similar to those of Alternative A, however the casino would be reduced in size, as would the number of gaming machines and tables contained therein. As with Alternative A, Alternative B would have two phases. Phase I includes the following components: (1) placing 228.04± acres into federal trust status; (2) approval of a Gaming Management Contract; and (3) development of a 100,750 square-foot casino. Phase II will add a 5-story, 166,500 square foot hotel as described under Alternative A. The components of Phase I and II are discussed in detail below.

DEVELOPMENT STANDARDS

Phases I and II

Similar to Alternative A, all occupiable structures proposed under Alternative B would be developed in accordance with applicable Uniform Building Codes, including all uniform fire, plumbing, electrical, mechanical, and related codes. Development would comply with the provisions outlined above for Alternative A including those of the Federal Americans with Disabilities Act and California state standards for food and beverage handling, and would incorporate built-in fire protection features as described above.

PHASE I

Land Trust Action

This action is identical to that described under Alternative A. The land trust action would be made in accordance with the procedures set forth in 25 CFR Part 151. Please refer to the land trust action discussion under Alternative A for more detail.

Management Contract

This action is identical to that described under Alternative A. The NIGC would review the Tribe's management contract in accordance with the authoritative provisions as authorized under IGRA (25 U.S.C. §2701 *et seq.*). Please refer to the development and management contract discussion under Alternative A for more detail.

Casino

The casino would consist of the same mixture of uses and employ the same development standards as those described under Alternative A; however, the casino would provide space for only 1,500 slot machines and 30 table games. The casino would offer a 250-seat buffet, 100-seat specialty restaurant, a 50-seat sports bar, and a 10-seat coffee bar. The proposed casino development is expected to employ approximately 1,101 employees. **A** breakdown of the proposed uses with associated square footages for the proposed casino complex of Alternative B are shown in **Table 2-3**. **Figures 2-9** and **2-10** show the site plan and architectural rendering of the Phase I development.

TABLE 2-3
ALTERNATIVE B CASINO USE AREAS

Area	Number	Square Footage
Casino		
Slot Machines	1,500	37,500
Table Games	30 Tables	11,250
Back of House Service and Support Areas		18,000
Food/Beverage Area (Itemized Below)		20,000
Buffet	250 Seats	
Specialty Restaurant	100 Seats	
Coffee Bar	10 Seats plus Counter	
Sports Bar	50 Seats	
Public/Misc. Area		14,000
	Phase I Total	**100,750**
Hotel	250 rooms	**166,500**
Event and Convention Center	1,200 Seats	**30,000**
	Phase II Total	**297,250**

NOTE: All figures are approximate.
SOURCE: KKE, 2004; AES, 2004.

SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; KKE Architects, 2004; HydroScience Engineers, 2004; AES, 2007

Figure 2-9
Alternative B (Phase I) Site Plan

SOURCE: KKE Architects, 2004; AES, 2007

Figure 2-10
Alternative B (Phase I) Architectural Rendering

Site Access and Parking

This project feature is similar to that described under Alternative A, but would be developed with proportionately less parking area. The driveway access would be the same for Alternative B as that described under Alternative A. For Phase I, a total of approximately 2,286 spaces would be provided, including 40 RV spaces and 11 bus spaces (**Figure 2-9**), 75-percent of the spaces allotted for Phase I of Alternative A. As with Alternative A, noise attenuation walls or earthen berms would be constructed along the western edge of the main parking area and along the western edge of the service court to shield residences to the northwest and southwest from noise.

Water Demand and Supply

Based upon estimates presented in the attached Water and Wastewater Feasibility Study (**Appendix B**), operation of Phase I of Alternative B would result in an average day water demand of 139,800 gpd (includes landscape irrigation at 10,000 gpd), 87-percent of the demand of Phase I of Alternative A. If recycled water were used within the casino complex, potable water demand would be reduced by 43,300 gpd, to a demand of 86,500 gpd. Water demand for Phase I would be met through the same mixture of water supply sources as discussed under Alternative A:

Option 1

Under Option 1, the total water demand, with or without the use of recycled water, would be met by the City of Plymouth municipal water supply as discussed under Alternative A (**Figure 2-9**).

Option 2

Water supplied under Option 2 during Phase I of Alternative B would be provided by the groundwater wells discussed under Phase I of Alternative A and a reduced number of trucking services compared to Alternative A. The groundwater wells would be developed as described above under Phase I of Alternative A.

An on-site reverse osmosis water treatment plant would be constructed as described under Alternative A. As discussed therein, the reverse osmosis treatment process would result in brine production, resulting in a water loss of approximately 10,000 gpd. The remaining water demand, including loss from brine production, would be met by trucking in water supplies, where applicable.

The estimated sustained yield of the groundwater wells (119,520 gpd) discussed under Alternative A would be the same for Alternative B. During Phase I of Alternative B and without the use of recycled water, 80-percent of demand would be met by groundwater wells, with the remaining 20-percent provided by water delivery in accordance with the will serve letter (**Appendix D**). Water from the wells and from the tanker trucks would be pumped to two 1.0 million gallon water tanks located to the east of the main parking lot, providing adequate capacity

for peak demand and necessary fire flows. The steel tanks would be sized and constructed in the same manner as discussed under Alternative A.

With the use of recycled water to off set water demands, 126-percent of the remaining water demand would met by the groundwater wells. Water trucking could be used to initially assist in filling the 1.2-million gallon storage tanks, after which the groundwater wells could be relied upon for potable water needs.

Wastewater Treatment and Disposal

Operation of Phase I of Alternative B would result in a wastewater generation rate of 108,300 gpd. Wastewater generated by Alternative B would be treated by an on-site wastewater treatment plant (WWTP) with the same design and average day capacity as that described under Phase I of Alternative A. The WWTP for Alternative B would treat 100-percent of wastewater to California Title 22 disinfected tertiary recycled water quality standards. The WWTP for Alternative B would also be constructed to provide an average day capacity of 200,000 gpd to allow for peak flows and redundant capacity for full build-out. Biosolids produced by the wastewater treatment plant would be dewatered and trucked off-site for disposal at a licensed landfill.

The Tribe may utilize recycled wastewater for landscape irrigation and toilet flushing within the casino to reduce the overall water demand, as well as to reduce the wastewater disposal requirements of this alternative. Treated water to be used for irrigation and toilet flushing would be stored in a 250,000 gallon recycled water tank prior to use. This recycled water tank would assure an adequate reserve capacity is available.

There are two options for disposal of treated wastewater, which are the same as those described under Alternative A. Disposal rates would be comparatively less for Alternative B. Option 1 would utilize a combination of sprayfields, ground disposal and reservoir storage. Option 2 would consist of surface water discharge or a combination of surface water discharge and ground disposal.

Option 1

Under Option 1, treated wastewater would be discharged in the same manner as described under Alternative A. Please refer to the description of wastewater treatment and disposal under Phase I of Alternative A for more detail.

Option 2

Under Option 2, treated wastewater would be discharged in the same manner as described under Alternative A. Please refer to the description of wastewater treatment and disposal under Phase I of Alternative A for more detail.

Landscaping and Utilities

Landscaping and utility features would be similar to those described under Phase I of Alternative A. All landscaping features would be planted with non-invasive plant species with existing vegetation incorporated into site designs, where applicable. All utility lines would be placed underground.

Site Drainage

Runoff from the project site would be conveyed by a combination of open channels and culverts (**Figure 2-11**). As with Alternative A, the drainage plan includes the use of several features, including vegetated swales, "Stormceptor" sediment/grease traps, and a detention basin. The detention basin would drain within 24 hours of a storm event. All of the proposed facilities would be constructed outside of the 100-year floodplain. Refer to the discussion under Alternative A and **Appendix G** for more details on the proposed drainage plan for Alternative B.

Security/Law Enforcement

Under Alternative B, the Tribe would employ security personnel to provide surveillance of the casino, parking areas, and surrounding grounds. Tribal security personnel would work cooperatively with the Amador County Sheriff's Office (ACSO), which provides general law enforcement services to the City of Plymouth on a contract basis. Security and law enforcement provisions of Alternative B are identical to those described under Alternative A.

Fire Protection

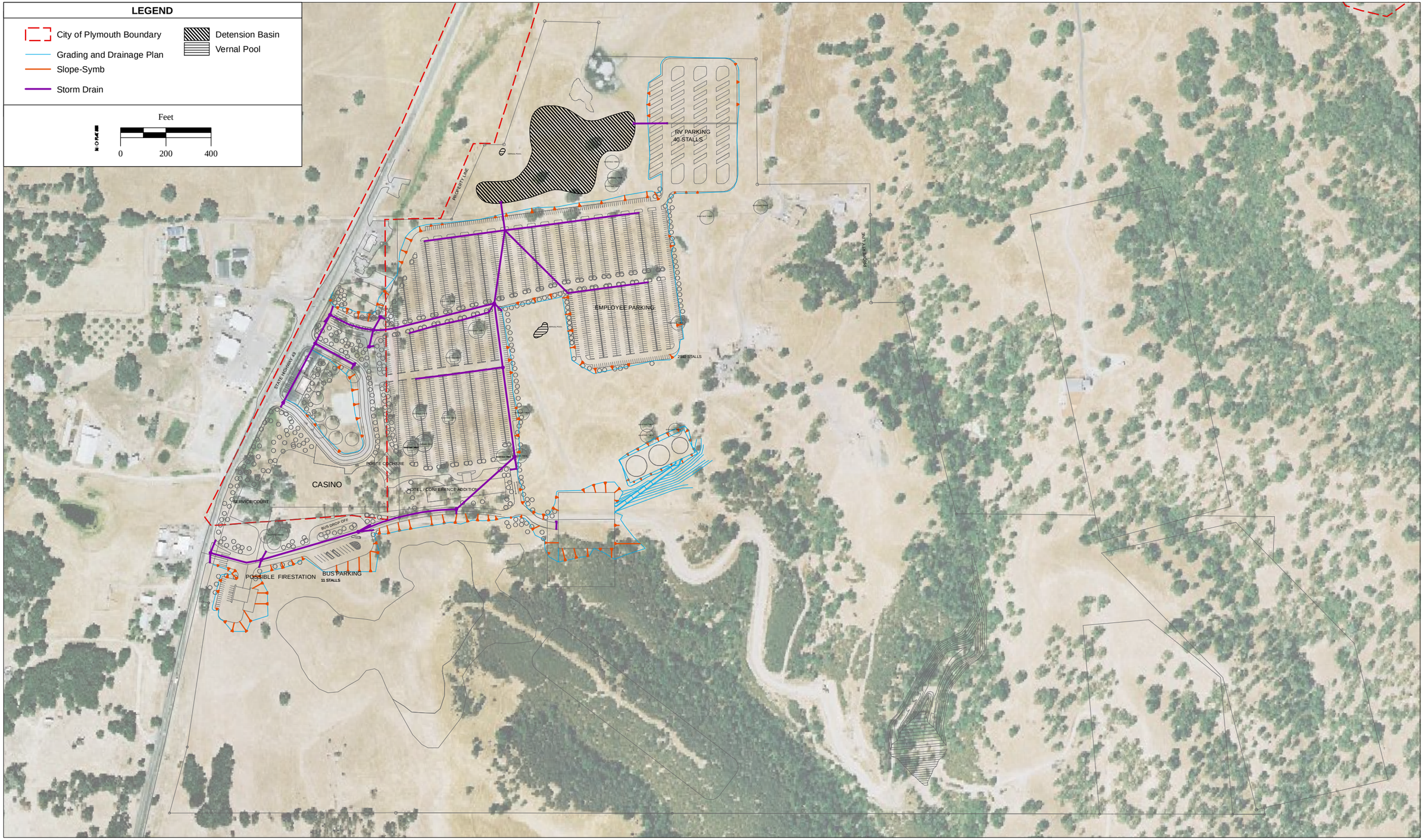
Under Alternative B, as with Alternative A, the Tribe would provide fire protection and emergency medical services by creating and staffing an independent fire station on the project site. This project feature is identical to that described under Alternative A.

PHASE II

Phase II would add a 5-story, 250-room hotel that would be connected to the south end of the casino. The exact timing of the hotel development is unknown at this time; however, for the purposes of this analysis, it is assumed that the hotel would be developed in 2009. **Figure 2-12** and **Figure 2-13** show the site plan and the architectural rendering with the addition of the hotel. The existing components of Phase I would remain unchanged.

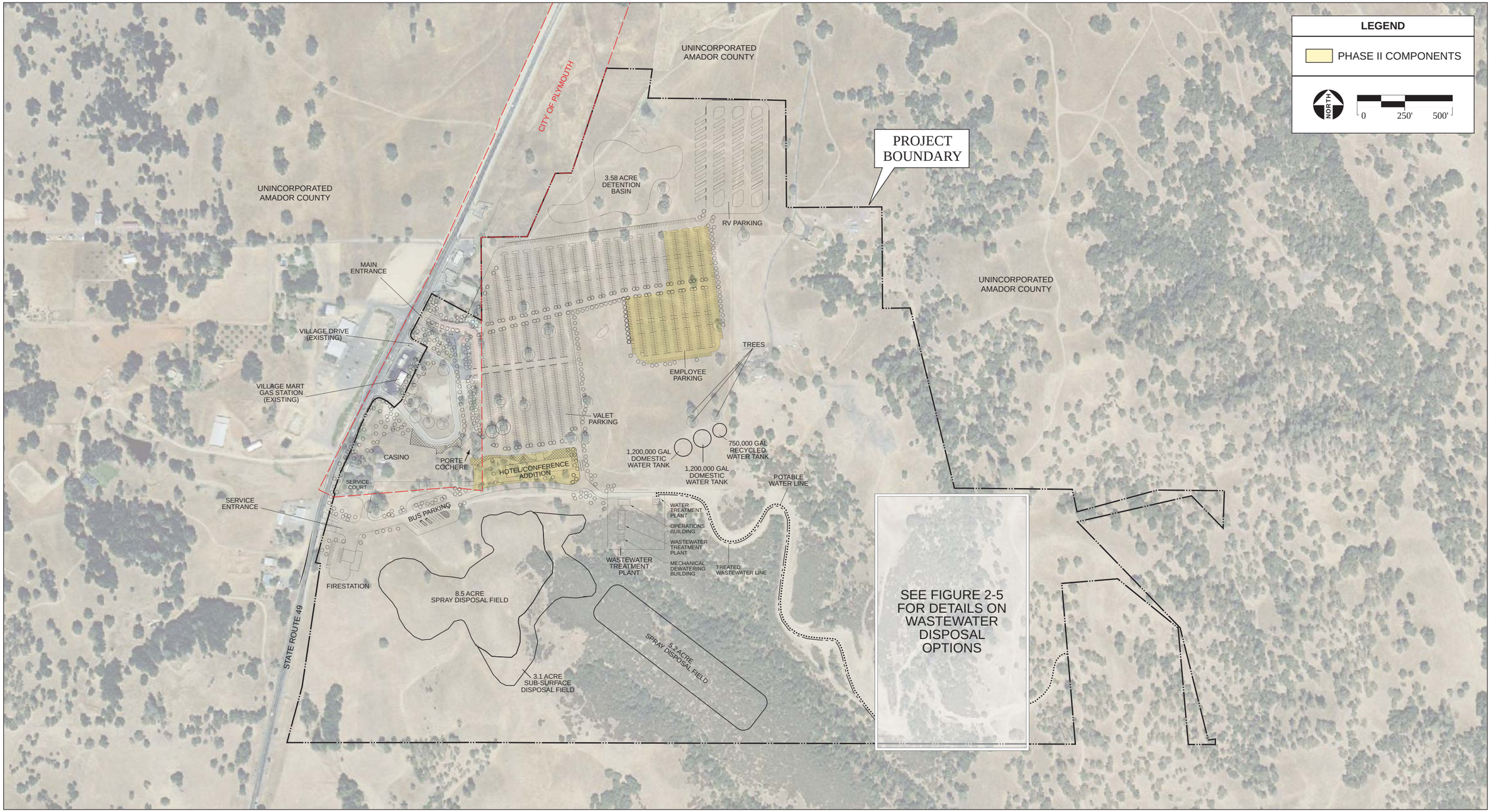
Hotel

This project feature is identical to that described under Alternative A. The 5-story hotel building would have a total building space of approximately 166,500 square feet. The main casino driveway would provide primary vehicle access to the hotel. The hotel would employ



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; American Aerial Mapping, 2003; Claybar Engineering, 2004; AES, 2007

Figure 2-11
Alternative B - Grading and Drainage Plan



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; KKE Architects, 2004; HydroScience Engineers, 2004; AES, 2007

Figure 2-12
Alternative B (Phase II) Site Plan

SOURCE: KKE Architects, 2004; AES, 2007

Figure 2-13
Alternative B (Phase II) Architectural Rendering

approximately 91 additional positions, resulting in a total employment of 1,192 for the full build-out of Alternative B.

Ancillary Components

Site Access and Parking

With the development of Phase II, the total parking spaces would increase to 3,000 stalls, including the 40 RV parking stalls and 11 bus parking areas (**Figure 2-12**), 80-percent of the parking stalls allotted for full build-out of Alternative A. The parking lot for the full build-out of Alternative B is equivalent in layout and size as the parking lot developed for Phase I of Alternative A. The main parking area would be located east of the casino on Parcel #3 and would provide valet parking spaces and self parking spaces. A second smaller parking area would be located southwest of the main casino entrance. The smaller parking area would provide additional self parking spaces and would also incorporate a bus loading area. An RV parking area located in the northern portion of the project site would provide 40 spaces. An access driveway from the northeast corner of the main parking lot would provide access to the RV parking area. No hook-up services (i.e. electricity, water, septic) would be provided to the RV parking area. Approximately 11 bus parking spaces would be provided just south of the main parking area.

Water Demand and Supply

Phase II would result in an additional water demand of 28,300 gpd, resulting in a full build-out water demand for Alternative B of approximately 168,100 gpd and an increase of approximately 20-percent from the sole operation of Phase I. With the use of recycled water, full build-out water demand would be reduced by 39-percent to 104,000 gpd.

Water demand would be met by the option selected during development of Phase I. If Option 1 were selected, the increase in water demands after development of Phase I would be met by the City of Plymouth's municipal water supply. If Option 2 were selected, additional water trucking would be needed, as supplies from groundwater pumping would already have reached maximum supply level.

Taking into account loss from brine production during water treatment, Phase II would require a total water supply for full build-out of approximately 178,600 gpd to meet projected water demands. Without the use of recycled water, 67-percent of the water supply would be provided by the groundwater wells developed during Phase I. The remaining 33-percent of the net water supply would be provided by water delivery, in accordance with the will serve letter (**Appendix D**). Water from the additional tanker trucks would be pumped to the two 1.0 million gallon water tanks developed under Option 1. No additional water would traverse through the water treatment plant as a result of the development of Phase II.

With the use of recycled water, 104-percent of water demand would be met by the groundwater wells developed during Phase I. Water trucking could be used to initially assist in filling the 1.0-million-gallon storage tanks, after which the groundwater wells could be relied upon for potable water needs.

Wastewater Treatment and Disposal

Operation of Phase II would add approximately 27,000 gpd to the wastewater generation rate of Phase I. This would result in a full build-out wastewater generation rate of 135,200 gpd for Alternative B. Wastewater generated by Alternative B would be treated by the on-site WWTP developed by the Tribe during Phase I. This WWTP would treat the additional wastewater produced by the hotel and event center facilities to meet California Title 22 disinfected tertiary recycled water quality standards, which may or may not be used to off-set potable water demands. As discussed under Phase I, the treatment capacity would already be designed to treat up to 200,000 gpd.

Wastewater disposal methodologies would be the same as those selected for Phase I and would increase 10,000 gpd after the completion of Phase II. As discussed above, Option 1 would utilize a combination of sprayfields, ground disposal, and reservoir storage and Option 2 would consist of surface water discharge or a combination of surface water discharge and ground disposal.

Landscaping and Utilities

Landscaping features and utility lines for the hotel and conference center would be developed in a similar manner as described under Phase I. All landscaping features would be planted with non-invasive plant species with existing vegetation incorporated into site designs, where applicable. All utility lines would be placed underground.

Site Drainage

Stormwater runoff generated during the operation of Phase II would be conveyed by the system developed during the construction of Phase I. The conveyance and treatment systems of the site drainage facilities would already have capacity to handle the additional runoff generated after the completion of Phase II. Refer to the discussion above under Phase I and **Figure 2-11**.

Fire Protection

With the development of an on-site fire station during Phase I, no additional resources would be necessary to respond to potential issues at the hotel and event center. The proposed purchase of a quint, as discussed under Phase I, would provide the necessary ladder capabilities to deal with potential fire and emergency situations involving the five-story hotel building.

Security/Law Enforcement

Prior to operation of Phase II, the Tribe would expand the number of employed security personnel to provide appropriate coverage of the newly constructed hotel and event center. When large events are planned at the event center, the tribe will ensure adequate security personnel are present to reduce potential impacts to public safety.

OTHER LAND USES

Disposition of Existing Land Uses

As with Alternative A, the development of Alternative B would result in the demolition of the Shenandoah Inn and the residences on Parcels #8 and #9 during Phase I. The residences on Parcels #2 and #13 would remain intact and in use. Under Alternative B, a portion of the existing landing strip on Parcel #3 would be graded and paved for surface parking. The remainder would be left undisturbed to protect an adjacent seasonal pond. The location of the mine lift-station on Parcel #1 would not be developed. However, due to the dilapidated condition of the structure and associated safety concerns, a 50-foot buffer would be established with a barrier, such as chain-linked fencing, surrounding the entrance of the mine and any associated appurtenances.

Future Development

No other developments, such as Tribal housing or other commercial facilities are expected to occur on the project site. The WWTP is designed to provide treatment only for the facilities described above; no other facilities would be served by the WWTP.

2.2.3 ALTERNATIVE C – REDUCED CASINO

Alternative C consists of a reduced casino that would be smaller in comparison with Alternatives A and B and would not be completed in phases, as Alternative C does not include a hotel or conference/event center. Alternative C entails: (1) placing 228.04± acres into Federal Trust status, (2) approval of a Gaming Management Contract, and (3) casino development. No other developments, such as Tribal housing or other commercial facilities are expected to occur on the project site. **Figure 2-14** and **Figure 2-15** show respectively the site plan and architectural rendering for the Reduced Casino Alternative. **Table 2-4** shows the breakdown of proposed uses with associated square footages for the proposed casino complex.

DEVELOPMENT STANDARDS

Similar to Alternative A, all occupiable structures proposed under Alternative C would be developed in accordance with applicable Uniform Building Codes, including all uniform fire, plumbing, electrical, mechanical, and related codes. Development would comply with the provisions outlined above for Alternative A including those of the Federal Americans with

SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; KKE Architects, 2004; HydroScience Engineers, 2004; AES, 2007

Figure 2-14
Alternative C Site Plan

SOURCE: KKE Architects, 2004; AES, 2007

Figure 2-15
Alternative C Architectural Rendering

Disabilities Act and California state standards for food and beverage handling, and would incorporate built-in fire protection features as described above.

Land Trust Action

This action is identical as that described under Alternative A above. The land trust action would be made in accordance with the procedures set forth in 25 CFR Part 151. Please refer to the land trust action discussion under Alternative A for more detail.

Management Contract

This action is identical to that described under Alternative A. The NIGC would review the Tribe's management contract in accordance with the authoritative provisions as authorized under the IGRA (25 U.S.C. §2701 *et seq.*). Please refer to the development and management contract discussion under Alternative A for more detail.

Casino

The casino would consist of the same mixture of uses described under Alternative A, though on a reduced scale compared to the size of the casinos proposed for Alternative A and Alternative B. The size of the casino would be reduced to 79,250 square feet and would provide space for 1,000 slot machines and approximately 20 table games. The casino would also provide a 250-seat buffet and a 50-seat sports bar. The proposed casino development is expected to employ approximately 809 employees. **Table 2-4** shows the breakdown of proposed uses with associated square footages for the proposed casino complex.

TABLE 2-4
ALTERNATIVE C CASINO USE AREAS

Area	Number	Square Footage
Casino		
Slot Machines	1,000	25,000
Table Games	20 Tables	7,500
Back of House Service and Support Areas		15,250
Food/Beverage Area		18,500
Buffet	250 Seats	
Sports Bar	50 Seats	
Public/Misc. Area		13,000
Total Casino		**79,250**
	Project Total	**79,250**

NOTE: All figures are approximate.
SOURCE: KKE, 2004; AES, 2004.

Site Access and Parking

This project feature is similar to that described under Phase I for Alternative A but has proportionately less parking area (**Figure 2-14**). A total of approximately 1,578 spaces would be provided, including 40 RV spaces and 11 bus spaces, accounting for 42-percent of the total spaces allotted for full build-out of Alternative A. Please refer to the description of the proposed parking area under Alternative A for more detail.

Water Demand and Supply

Based upon estimates presented in the attached Water and Wastewater Feasibility Study (**Appendix B**), operation of Alternative C would result in an average day water demand of 105,100 gpd (including landscape irrigation demand of 10,000 gpd), 56-percent of the water demand of full build-out of Alternative A. If recycled water were used within the casino complex, potable water demand would be reduced by 30,200 gpd, to a demand of 64,900 gpd. Water demand for Phase I would be met through the same mixture of water supply sources previously discussed:

Option 1

As with Alternative A, water supplied from Option 1 of Alternative C would be provided by the City of Plymouth's municipal supply when the City and Amador Water Agency (AWA) complete the planned Plymouth pipeline project, as discussed under Phase I for Alternative A. Similar to Alternative A, Alternative C would connect to existing water lines in vicinity of the project site.

Option 2

Water supplied under Option 2 for Alternative C would be provided by groundwater wells with reserve supply provided via water truck. As with Alternative A, an on-site reverse osmosis water treatment plant would be constructed east of the WWTP. Brine production associated with the water treatment plant would result in the loss of potable water. The water treatment plant be designed so potable water supplied to the casino meets all SDWA water standards. For additional details on the water supply please refer to the water supply discussion under Phase I of Alternative A.

During operation of Alternative C, it is expected that 100-percent of the water supply would be provided by groundwater, even with losses from the water treatment process. The extra water supply (water delivery) would be held in reserve for emergency purposes. Water from the wells would be delivered to two 1.0 million gallon domestic water tanks located to the east of the main parking lot. These tanks would provide a total of 2.0 million gallons of storage capacity to assure an adequate reserve water supply and adequate flow for fire suppression.

Wastewater Treatment and Disposal

Wastewater generated by Alternative C would be treated by a proposed WWTP located on the project site. Alternative C would generate an average wastewater flow of 75,400 gpd, 49-percent of the full build-out wastewater generation rate of Alternative A. To allow for peak flows and redundant capacity, the facility would be constructed to provide an average day capacity of 100,000 gpd. The treatment and disposal of wastewater generated by Alternative C is similar to that described under Alternative A; however, the WWTP proposed for Alternative C would provide proportionately less treatment capacity due to the smaller casino proposed.

As with Alternative A, there are two options for the disposal of treated wastewater (**Figure 2-16**). Option 1 would utilize a combination of sprayfields, ground disposal, and reservoir storage. Option 2 would consist of surface water discharge or a combination of surface water discharge and ground disposal. These two options are similar to those described under Alternative A. However, under Option 1, the proposed winter storage reservoir would be scaled down in comparison with Alternative A and would impound approximately 19.3 acre-feet of tertiary treated wastewater with an approximately 75-foot high earth dam. Under Option 2, less effluent would be discharged into the surface water than under Alternative A. For additional details on wastewater treatment and disposal please refer to **Appendix B**.

Landscaping and Utilities

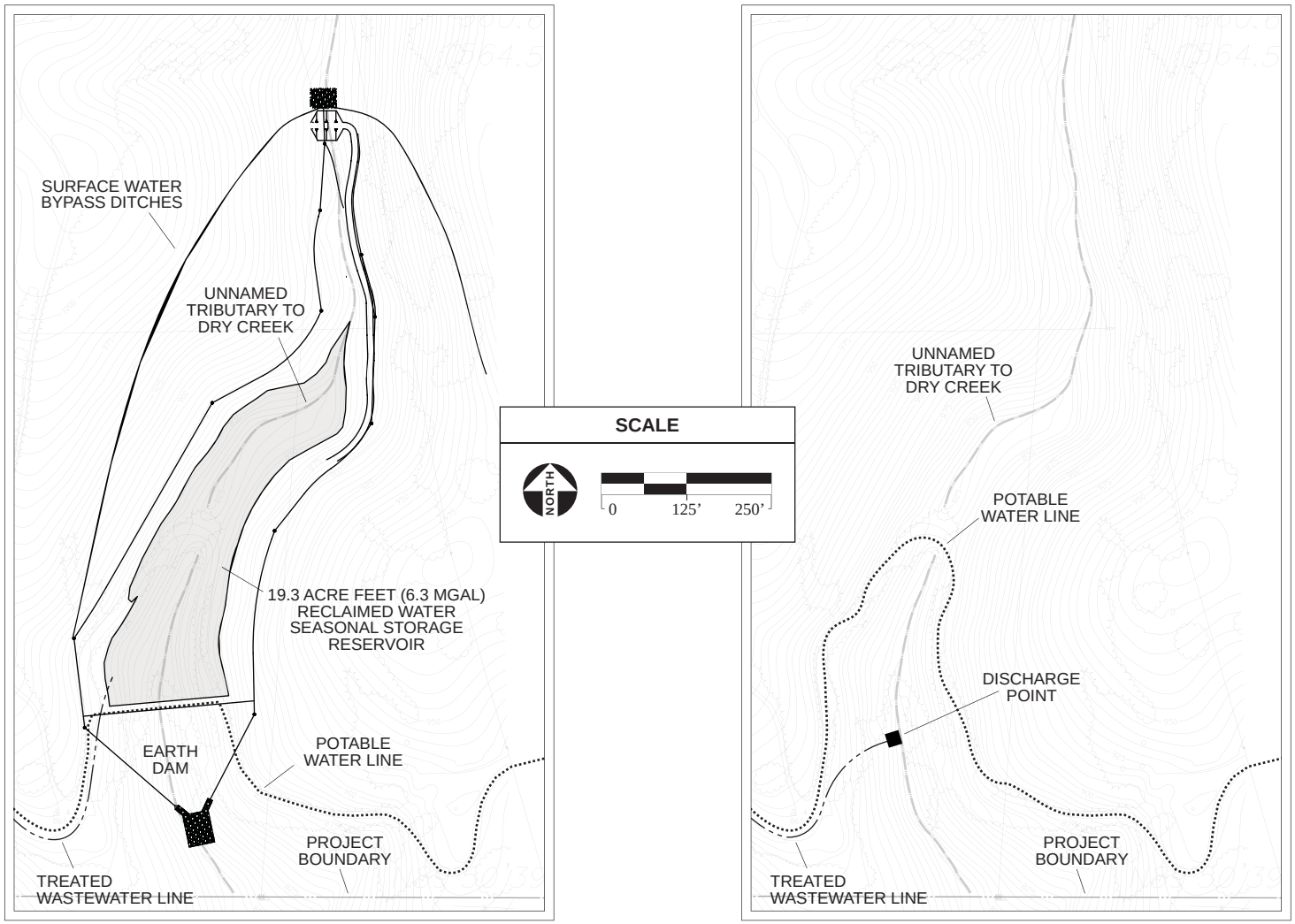
Landscaping and utility features would be similar to those described under Phase I of Alternative A. All landscaping features would be planted with non-invasive plant species with existing vegetation incorporated into site designs, where applicable. All utility lines would be placed underground.

Site Drainage

Runoff from the project site would be conveyed by a combination of open channels and culverts, as described above (**Figure 2-17**). As with Phase I of Alternative A, the drainage plan includes the use of several features including vegetated swales, "Stormceptor" sediment/grease traps, and a detention basin. The detention basin would drain within 24 hours of a storm event. All of the proposed facilities would be constructed outside of the 100-year floodplain. Please see the discussion under Phase I of Alternative A for more details on the proposed drainage plan for Alternative C.

Security/Law Enforcement

Under Alternative C, the Tribe would employ security personnel to provide surveillance of the casino, parking areas, and surrounding grounds. Tribal security personnel would work cooperatively with the Amador County Sheriff's Office (ACSO), which provides general law

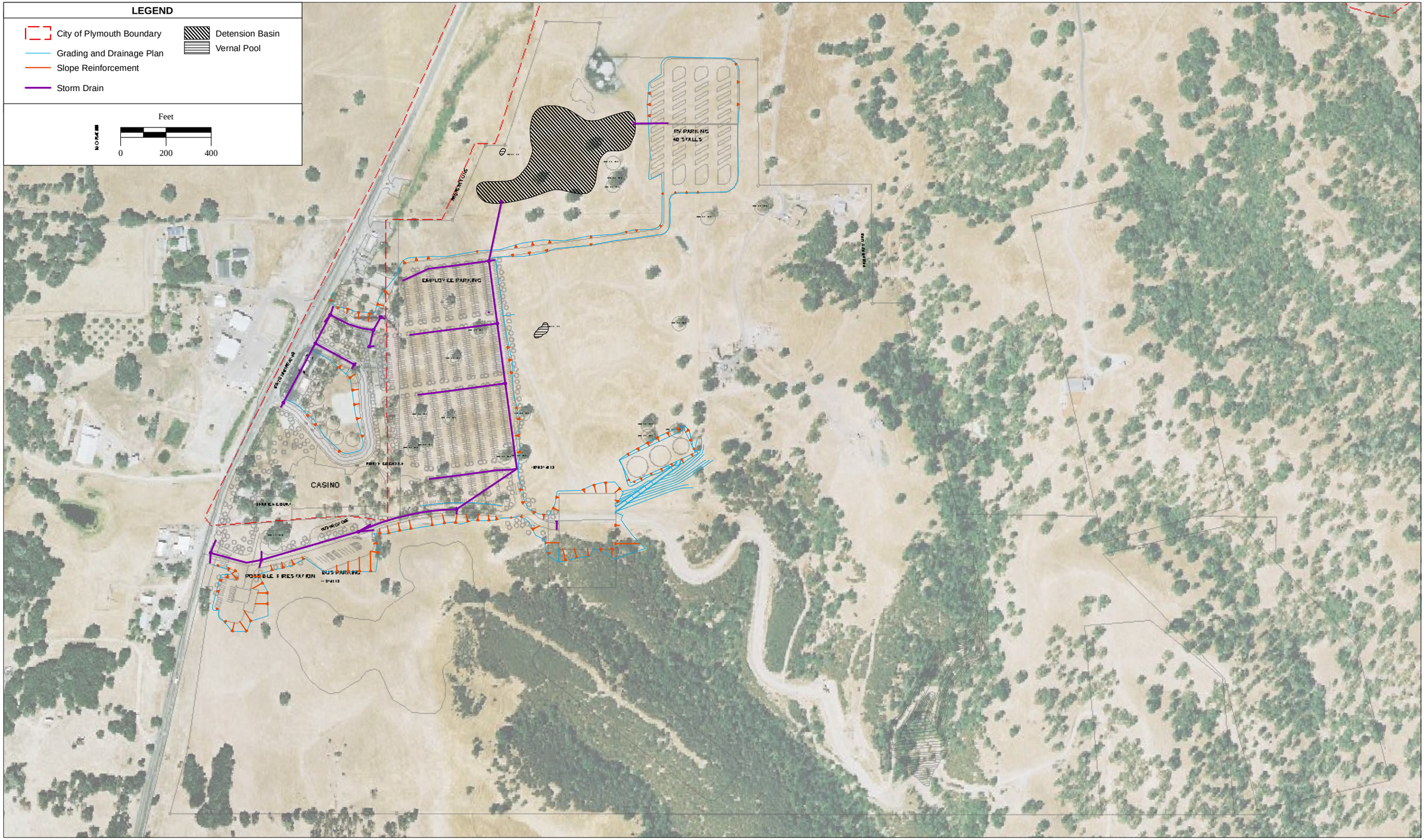


WASTEWATER DISPOSAL OPTION 1
SEASONAL STORAGE RESERVOIR

WASTEWATER DISPOSAL OPTION 1
SURFACE WATER DISCHARGE POINT

SOURCE: HydroScience Engineers, 2004; AES, 2007

Figure 2-16
Wastewater Disposal Options for Alternative C



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; American Aerial Mapping, 2003; Claybar Engineering, 2004; AES, 2007

Figure 2-17
Alternative C - Grading and Drainage Plan

enforcement services to the City of Plymouth on a contract basis. Security and law enforcement provisions of Alternative C are identical to those described under Phase I of Alternative A.

Fire Protection

Under Alternative C, the Tribe would provide fire protection and emergency medical services by creating and staffing an independent fire station on the project site. This project feature is identical to that described under Phase I of Alternative A, except a quint or other type of ladder truck would not be required due to the lack of a multi-storied building under Alternative C.

OTHER LAND USES

Disposition of Existing Land Uses

The development of Alternative C would result in the demolition of the Shenandoah Inn and the residences on Parcels #8 and #9 prior to any construction. The residences on Parcels #2 and #12 would remain intact and in use. Under Alternative C, a portion of the existing landing strip on Parcel #3 would be graded and paved for surface parking. The remainder would be left undisturbed to protect an adjacent seasonal pond. The location of the mine lift station on Parcel 1 would not be developed. However, due to the dilapidated condition of the structure and associated safety concerns, a 50-foot buffer would be established with a barrier, such as chain-linked fencing, surrounding the entrance of the mine and any associated appurtenances.

Future Development

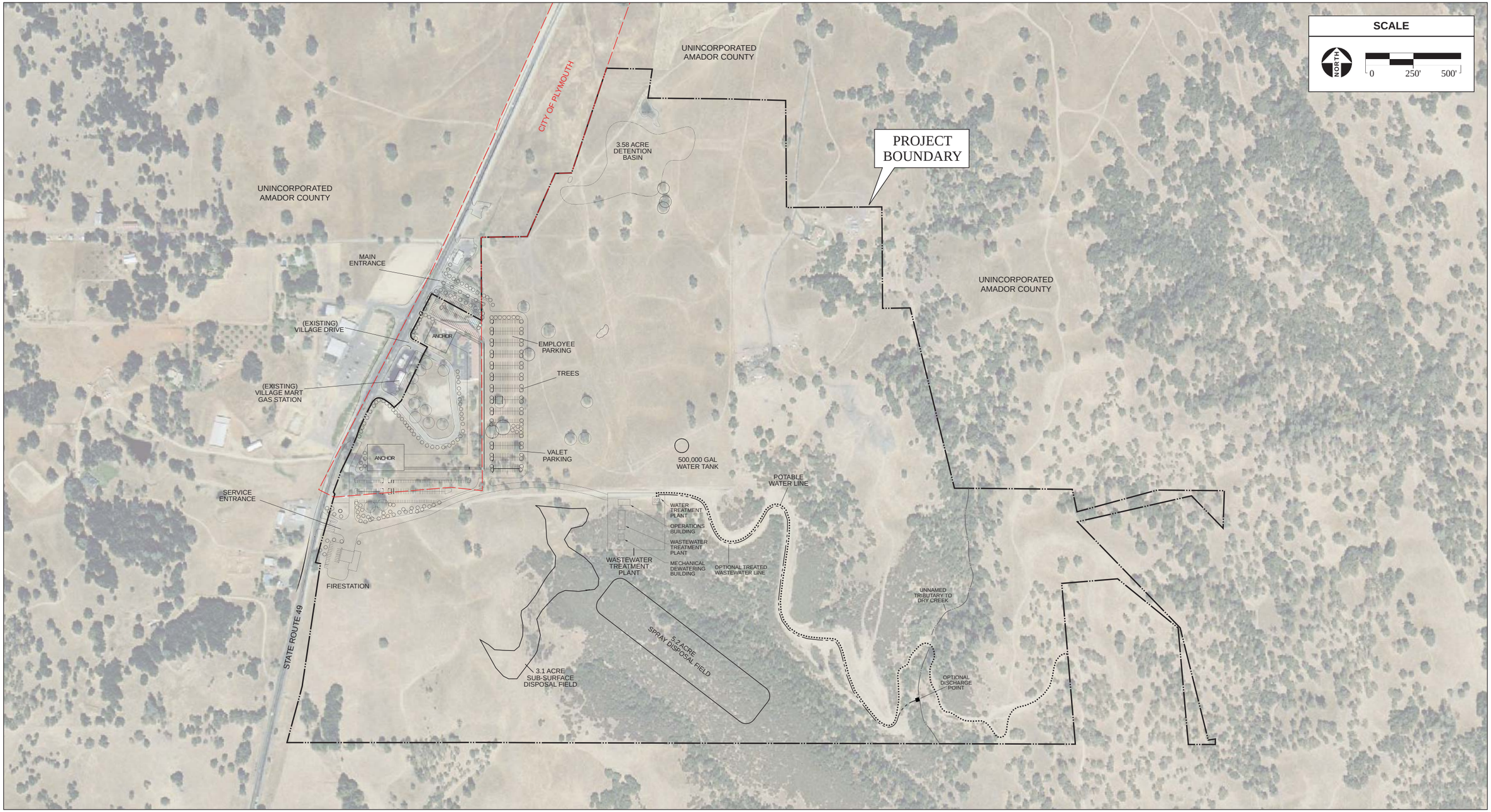
No other developments, such as Tribal housing or other commercial facilities are anticipated to occur on the project site. The WWTP is designed to provide treatment only for the facilities described above; no other facilities would be served by the WWTP.

2.2.4 ALTERNATIVE D – RETAIL DEVELOPMENT

Alternative D consists of placing 228.04± acres into federal trust status and the development of a regional shopping center, rather than a casino and hotel/event center project. No other developments, such as Tribal housing or other commercial facilities are expected to occur on the project site. **Figure 2-18** and **Figure 2-19** show the site plan and the architectural rendering for the Retail Development Alternative.

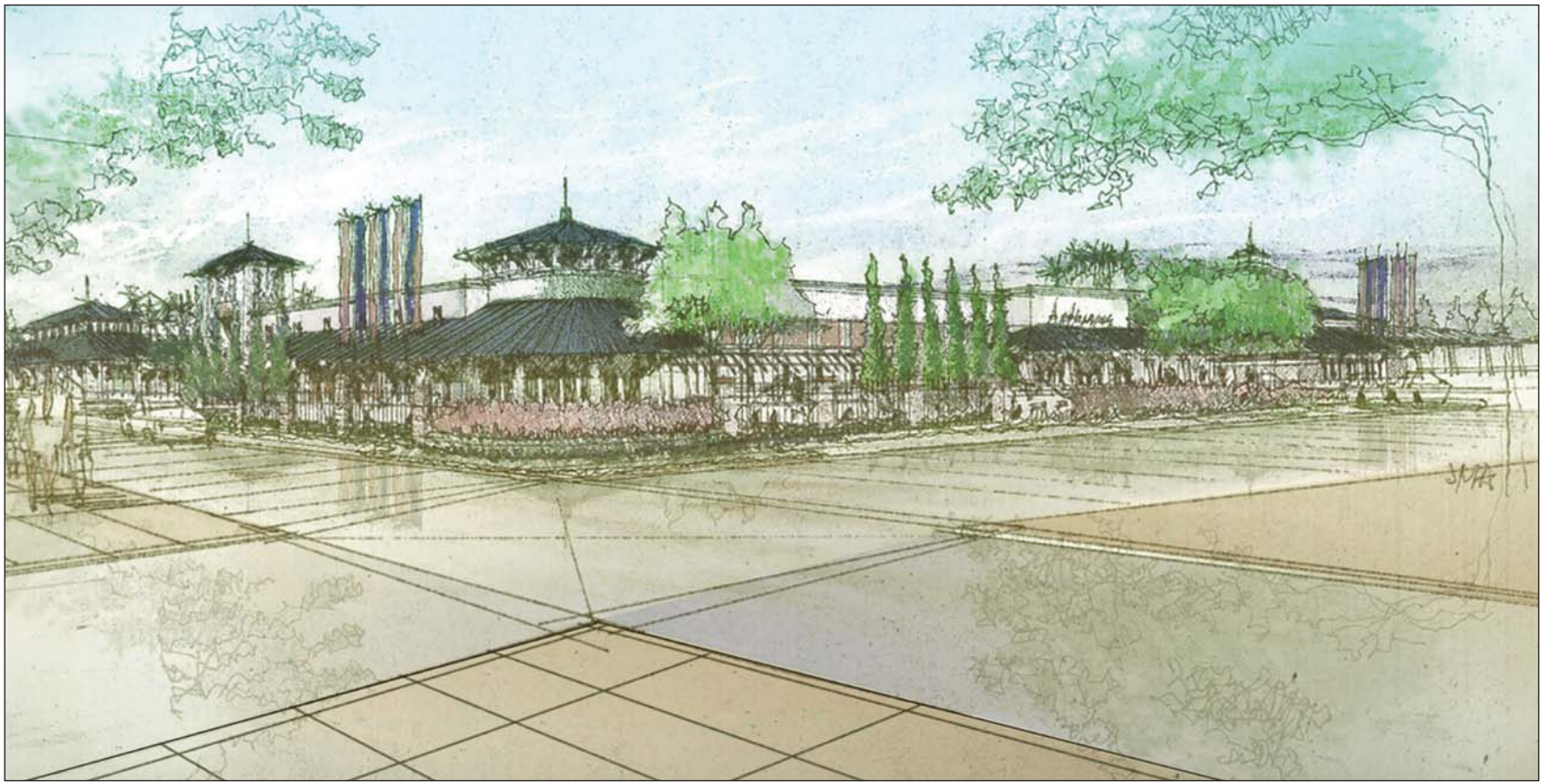
DEVELOPMENT STANDARDS

Similar to Alternative A, all occupiable structures proposed under Alternative D would be developed in accordance with applicable Uniform Building Codes, including all uniform fire, plumbing, electrical, mechanical, and related codes. Development would comply with the provisions outlined above for Alternative A including those of the Federal Americans with



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; KKE Architects, 2004; HydroScience Engineers, 2004; AES, 2007

Figure 2-18
Alternative D Site Plan



SOURCE: KKE Architects, 2004; AES, 2007

Figure 2-19
Alternative D Architectural Rendering

Disabilities Act and California state standards for food and beverage handling, and would incorporate built-in fire protection features as described above.

Land Trust Action

This action is identical to that described under Alternative A above. The land trust action would be made in accordance with the procedures set forth in 25 CFR §151. Please refer to the land trust action discussion under Alternative A for more detail.

Retail Development

Alternative D consists of a regional retail outlet center. Retail and restaurant developments are proposed on Parcels #3 through #11. **Table 2-5** shows the breakdown of proposed uses with associated square footages for the proposed development. The retail development would have a horseshoe-like shape with the open end facing to the east of the project site. All storefronts would face inward toward the parking facilities with no fronts open to SR 49. The horseshoe-like shape would consist of smaller in-line stores with two large anchor stores on each end. The proposed development is expected to employ approximately 180 employees, approximately 13-percent of the employment of Alternative A.

TABLE 2-5
ALTERNATIVE D RETAIL USE AREAS

Area	Number	Square Footage
Anchor Stores	2	42,625
In Line Shops	undetermined	80,625
Total Shopping		123,250

NOTE: All figures are approximate.
SOURCE: AES

Site Access and Parking

Parking for Alternative D would be located east of the retail outlet and would provide a total of 650 parking spaces (**Figure 2-18**), 17-percent of the allotted spaces for full build-out of Alternative A. Access from SR 49 to the parking facilities would be provided via a driveway to the north of the retail development. The parking lot would be equipped with typical lighting standards providing downcast lighting for visibility and security purposes.

Water Supply

Alternative D would generate a water demand of 34,400 gpd to operate the proposed retail outlet including landscape irrigation, 18-percent of the water demand for full build-out of Alternative A. Recycled water would not be a development option for Alternative D. As with the alternatives

above, water demand would be met for Alternative D by either one of two options, similar to those described above:

Option 1

Water supplied from Option 1 of Alternative D would be provided by the City of Plymouth's municipal supply when the City and Amador Water Agency (AWA) complete the planned Plymouth pipeline project, as discussed under Phase I of Alternative A. Similar to Alternative A, Alternative D would connect to existing water lines in vicinity of the project site.

Option 2

Under Option 2, water for Alternative D would come from groundwater wells with reserve supply provided by water delivery via water truck. As with Phase I of Alternative A, an on-site reverse osmosis water treatment plant would be constructed east of the WWTP, which would result in potable water loss due to brine production. The water treatment plant would be constructed so potable water supplied to the retail center would meet all SDWA standards. For additional details on the water supply please refer to the Water and Wastewater Feasibility Study attached at **Appendix B**.

During operation of Alternative D, it is expected that 100-percent of the water supply would be provided by groundwater, even with the water loss from brine production. The extra water supply (water delivery) will be held in reserve for emergency purposes. Water from the wells would be delivered to a 500,000 gallon domestic water tank located to the east of the main parking lot. This tank would provide storage capacity to assure an adequate reserve water supply and adequate water flow for fire suppression. As an alternative or backup option, water would be delivered by water truck to the domestic water tank.

Wastewater Treatment and Disposal

Wastewater generated by Alternative D would be treated by a proposed WWTP located on the project site. Alternative D would generate an average wastewater flow of 28,000 gpd, 18-percent of the wastewater generation rate for full build-out of Alternative A. To allow for peak flows and redundant capacity, the facility would be constructed to provide an average day capacity of 30,000 gpd. Under Alternative D, there are two options for the disposal of treated wastewater. Option 1 would utilize sprayfields and ground disposal. Option 2 would consist of surface water discharge or a combination of surface water discharge and ground disposal. These two options are similar to those described under Alternative A. However, under Option 1, a winter storage reservoir would not be required. Under Option 2, less effluent would be discharged into the surface water than in Alternative A. For additional details on wastewater treatment and disposal please refer to **Appendix B**.

Landscaping and Utilities

Landscaping and utility features would be similar to those described under Alternative A. All landscaping features would be planted with non-invasive plant species with existing vegetation incorporated into site designs, where applicable. All utility lines would be placed underground.

Site Drainage

Runoff from the project site would be conveyed by a combination of open channels and culverts (**Figure 2-20**). As with Alternative A, the drainage plan includes the use of several features, including vegetated swales, "Stormceptor" sediment/grease traps, and a detention basin. The detention basin would provide adequate storage for a 100-year flood event. The detention basin would drain within 24 hours of a storm event. All of the proposed facilities would be constructed outside of the 100-year floodplain.

Security/Law Enforcement

Under Alternative D, the Tribe would employ security personnel to provide surveillance of the retail outlet, parking areas, and surrounding grounds. Tribal security personnel would work cooperatively with the Amador County Sheriff's Office (ACSO), which provides general law enforcement services to the City of Plymouth on a contract basis. Security and law enforcement provisions of Alternative D are similar to those described under Alternative A; however, a reduced number of security personnel would be hired under Alternative D compared to Alternative A.

Fire Protection

Under Alternative D, the Tribe would provide fire protection and emergency medical services by creating and staffing an independent fire station on the project site. This project feature is identical to that described under Alternative C, as no ladder track is required for Alternative D.

OTHER LAND USES

Disposition of Existing Land Uses

As with Alternative A, the development of Alternative D would result in the demolition of the Shenandoah Inn and the residences on Parcels #8 and #9. The residences on Parcels #2 and #12 would remain intact and in use. Under Alternative D, the area of the existing landing strip on Parcel #3 would be left undisturbed; however, the landing strip would not be used. The location of the mine lift station on Parcel #1 would not be developed. However, due to the dilapidated condition of the structure and associated safety concerns, a 50-foot buffer would be established with a barrier, such as chain-linked fencing, surrounding the entrance of the mine and any associated appurtenances.

SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; American Aerial Mapping, 2003; Claybar Engineering, 2004; AES, 2007

Figure 2-20
Alternative D - Grading and Drainage Plan

Future Development

No other developments, such as Tribal housing or other commercial facilities are expected to occur on the project site. The WWTP is designed to provide treatment only for the facilities described above; no other facilities would be served by the WWTP.

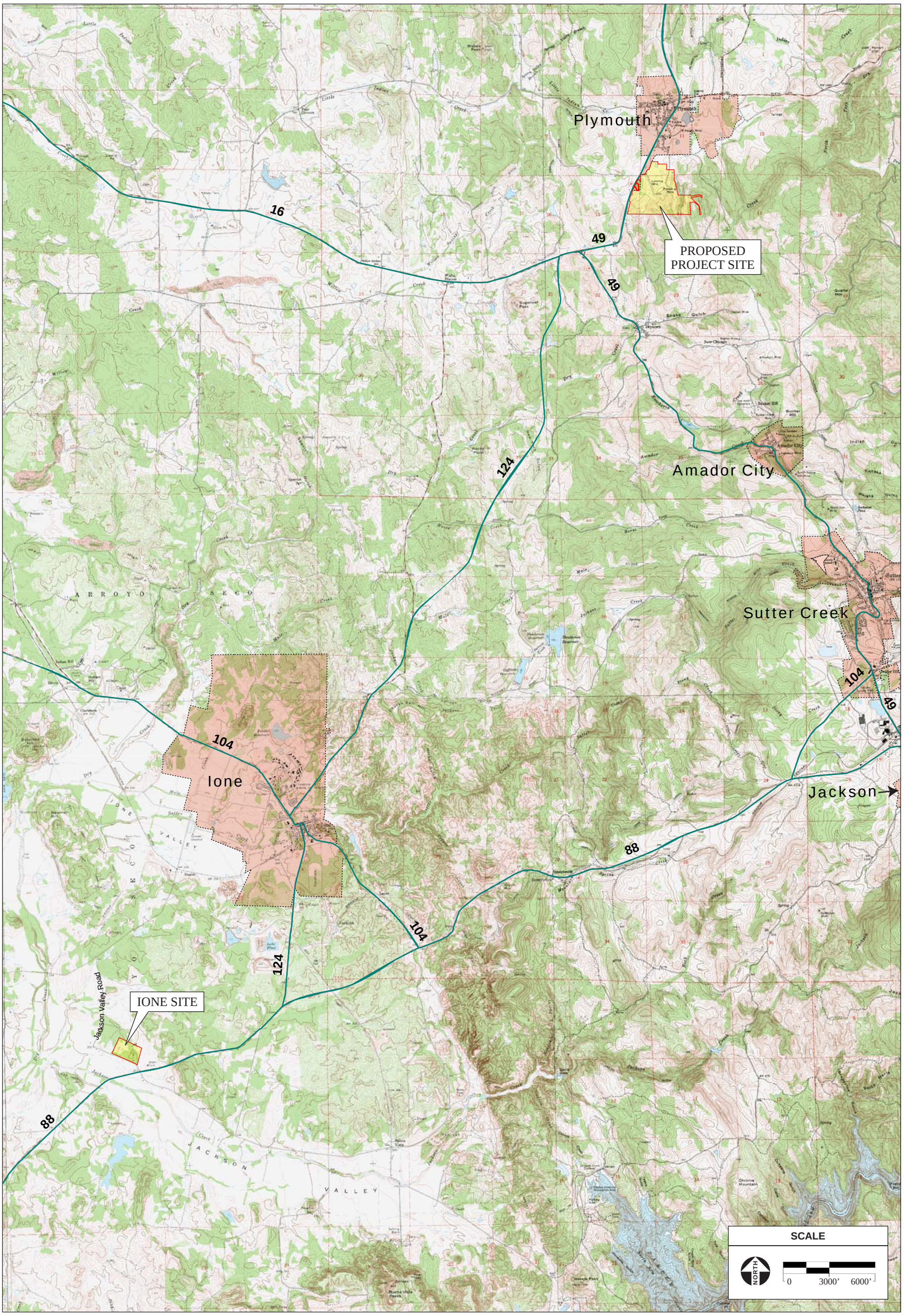
2.2.5 ALTERNATIVE E - NO ACTION ALTERNATIVE

Under the No Action Alternative, the twelve parcels (228.04± acres) would not be developed as described under any of the alternatives identified. Land use jurisdiction of the property would remain with the City of Plymouth and the County of Amador. The proposed trust parcels would continue in the short-term to be vacant. With the construction of the Plymouth Pipeline project, the building moratorium would be lifted and at least a portion of the twelve parcels could ultimately be developed by the Tribe consistent with current zoning, or sold to a private party for development.

For the purposes of the environmental analysis in this EIS, it is assumed that the building moratorium would be lifted and the property would be ultimately developed. Based on planned residential projects within the City's sphere of influence that are contingent upon lifting of the moratorium, the site may be developed with either residential communities or corresponding commercial services, or a mixture of both. Development would be required to be consistent with the City of Plymouth General Plan, including providing a 200-foot buffer between residential/commercial land uses and mining operations. On- and off-site effects of the Casino and Hotel Alternative, Reduced Casino With Hotel Alternative, and Reduced Casino Alternative would be avoided. However, effects similar to the Retail Development Alternative might still be experienced.

2.2.6 ALTERNATIVES CONSIDERED BUT ELIMINATED

Prior to focusing on the Proposed Project site, the Tribe also considered another site in Amador County for development. As shown in **Figure 2-21**, the site is located on an approximately 40-acre parcel off Jackson Valley Road outside of the City of Ione in an unincorporated area of Amador County. Historically the Tribe has tried to obtain this land, but the Federal Government has never been able to secure the title for the property. The site was evaluated for its ability to meet the Tribe's purpose and need and environmental suitability for development. The site was not further considered for several reasons. In determining the gaming facility design, it was determined that to best achieve the expected customer experience, the casino element would require a minimum of 40-acres of relatively level and vacant land (AES, 2003). The Jackson Valley Road parcel is characterized by predominantly forested area, scattered small developments, and some open spaces. The 40-acre plot meets the minimum casino element requirement. However, development of the site would result in the loss of a substantial amount of



SOURCE: USGS 7.5 Minute Topographic Quadrangles; AES, 2007

Figure 2-21
Alternative Sites Considered

trees and other vegetation, displace existing residents, and would not have the ability to accommodate any ancillary components, such as a reservoir or wastewater treatment facility. Additionally, the southern portion of the project site, adjacent to Jackson Valley Road, is located within the 100-year floodplain.

2.3 SUMMARY OF FEATURES AND ENVIRONMENTAL CONSEQUENCES

The main features of the alternatives are presented below in **Table 2-6**. The key features and environmental effects are summarized below.

ALTERNATIVE A – PROPOSED CASINO AND HOTEL

Alternative A would consist of placing 228.04± acres into federal trust status and the development of a casino, hotel, and event center, adjacent parking, and ancillary uses. Full build-out of Alternative A would generate water demands of either 188,500 gpd or 116,700 gpd (the later if recycled water used within project facilities where applicable), average wastewater flows of 154,600 gpd, significant vehicle trips, as well as substantial employment, wages, and expenditures on goods and services into the local economy. Environmental consequences from Alternative A before the implementation of mitigation measures include: effects to water resources from increased use of groundwater, if water supply Option 1 is implemented, effects to traffic from trip generation, effects to air quality from emissions due to traffic improvements, biological resources, effects to public services resulting from increased demand of law enforcement services, and effects to noise levels from increases in ambient noise levels. The implementation of mitigation measures provided within this document would reduce effects from Alternative A to a less-than-significant level, except for cumulative effects to air quality and effects to traffic at two intersections in proximity to the project site.

ALTERNATIVE B – REDUCED CASINO WITH HOTEL ALTERNATIVE

Alternative B would consist of placing the same 228.04± acres of land into federal trust status. Compared to Alternative A, Alternative B includes the development of a slightly reduced size casino, a similar size hotel, event center, a reduced sized parking lot and ancillary facilities. Development of Alternative B would generate water demands of 168,000 gpd or 116,700 gpd (recycled water use), wastewater flows of 135,200 gpd, and vehicle trips, as well as employment, wages, and expenditures on goods and services into the local economy, of a slightly smaller magnitude than Alternative A. Environmental consequences resulting from Alternative B would be similar but to a slightly lesser extent than Alternative A. Similar to Alternative A, the implementation of mitigation measures provided within this document would reduce effects from Alternative B to a less-than-significant level, except for cumulative air quality and traffic effects.

TABLE 2-6
COMPARISON OF ALTERNATIVES

Project Features	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Casino					
Slot Machines	2,000	1,500	1,000	n/a	n/a
Table Games	40 Tables	30 Tables	20 Tables	n/a	n/a
Food/Beverage Area (sf)	20,000	20,000	18,500	n/a	n/a
Total Square Feet	120,000	100,750	79,250	n/a	n/a
Hotel	250 Rooms	250 Rooms	n/a	n/a	n/a
Event and Convention Center	1,200 Seats	1,200 Seats	n/a	n/a	n/a
Retail Outlet (sf)	n/a	n/a	n/a	123,250	n/a
Parking Spaces	3,732	2,286	1,579	650	n/a
Water Demand (Phase I and II)					
w/o Recycled Water	188,500	168,100	105,100	34,400	n/a
w/ Recycled Water	116,700	104,000	64,900	N/A	n/a
Wastewater					
Average Wastewater Flow (gpd)	154,600	135,200	75,400	28,000	n/a
Wastewater Treatment Plant Capacity - Average Day (gpd)	200,000	200,000	100,000	30,000	n/a
Disposal Options	Landscape Irrigation, Sprayfields, Subsurface, Surface Water Discharge	Landscape Irrigation, Sprayfields, Subsurface, Surface Water Discharge	Landscape Irrigation, Sprayfields, Subsurface, Surface Water Discharge	Landscape Irrigation, Sprayfields, Subsurface, Surface Water Discharge	n/a
WW Reservoir Size (acre-feet)	37.4	31.6	19.3	0	n/a
Employees	1,517	1,324	898	720	n/a

NOTES: All figures are approximate.
sf = square feet.
gpd = gallons per day.
SOURCE: KKE, 2004; AES, 2005.

ALTERNATIVE C – REDUCED CASINO ALTERNATIVE

Alternative C would consist of placing the same 228.04± acres into federal trust status. Compared to Alternative A, Alternative C includes the development of a reduced size casino and parking lot, and would not include the development of a hotel or event/convention center. Development of Alternative C would generate water demands of 105,100 gpd or 75,400 gpd (recycled water use), wastewater flows of 75,400 gpd, and vehicle trips, as well as employment,

wages, and expenditures on goods and services into the local economy of a smaller magnitude than Alternative A. Environmental consequences resulting from Alternative C would be similar but to a lesser extent than Alternative A. Similar to Alternative A, the implementation of mitigation measures provided within this document would reduce effects from Alternative C to a less-than-significant level, except for cumulative air quality and traffic effects.

ALTERNATIVE D – RETAIL DEVELOPMENT

Alternative D would consist of placing the same 228.04± acres into federal trust status. Alternative D includes the development of a retail outlet and ancillary uses on Parcels #3 through #11, rather than a casino and hotel project. Development of Alternative D would generate water demands of 34,400 gpd, wastewater flows of 28,000 gpd, and vehicle trips, as well as employment, wages, and expenditures on goods and services into the local economy, of a substantially smaller magnitude than Alternative A. Environmental consequences resulting from Alternative C would be similar but to a lesser extent than Alternative A. Similar to Alternative A, the implementation of mitigation measures provided within this document would reduce effects from Alternative D to a less-than-significant level, except for cumulative air quality and traffic effects.

ALTERNATIVE E – NO ACTION ALTERNATIVE

The No Action Alternative would temporarily avoid all environmental effects associated with the implementation of the development alternatives. Based on the planned projects in the area and proposed expansion of the City's sphere of influence, residential, commercial, or a mixture of both is anticipated for the site. However, approval of the No Action Alternative would be less preferable than the development alternatives, since it would not meet the purpose and need for the Proposed Action. Under Alternative E, no added economic benefit to the Tribal Government, tribal members, or the adjoining communities would occur.