

SECTION 2.0

ALTERNATIVES

SECTION 2.0

ALTERNATIVES

2.1 INTRODUCTION

This section describes the alternatives that are analyzed within this Final Environmental Impact Statement (Final EIS). These alternatives include four development alternatives, as well as the No Action Alternative. Consistent with Council on Environmental Quality (CEQ) guidelines (section 1502.14), this section includes a detailed discussion and comparison of the alternatives analyzed in this Final 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 Bureau of Indian Affairs (BIA) and National Indian Gaming Commission (NIGC), with exception of Alternative 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 Development and 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

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.

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 similar to required provisions of public facilities owned and operated by the federal government. This would include adequate access and egress points and safety provisions such as emergency lighting.

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. These systems will comply with applicable codes as required by federal buildings.

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 Part 151. 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 of 1988 (25 U.S.C. § 2701 *et seq.*) (IGRA) must be included as part of a 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.

**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.

Development and Management Contract

Congress enacted IGRA 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.

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 main 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**. An updated site plan and rendering are provided in **Appendix Y**.

The gaming facility would include the casino floor, food and beverage areas, back of house and support services, and public/miscellaneous areas and would operate 24-hours per day. 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 and clearly identified.

Site Access and Parking

Two driveways off State Route (SR) 49 spaced approximately 1,200 feet apart would provide access to the casino complex (**Figure 2-1**). 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.

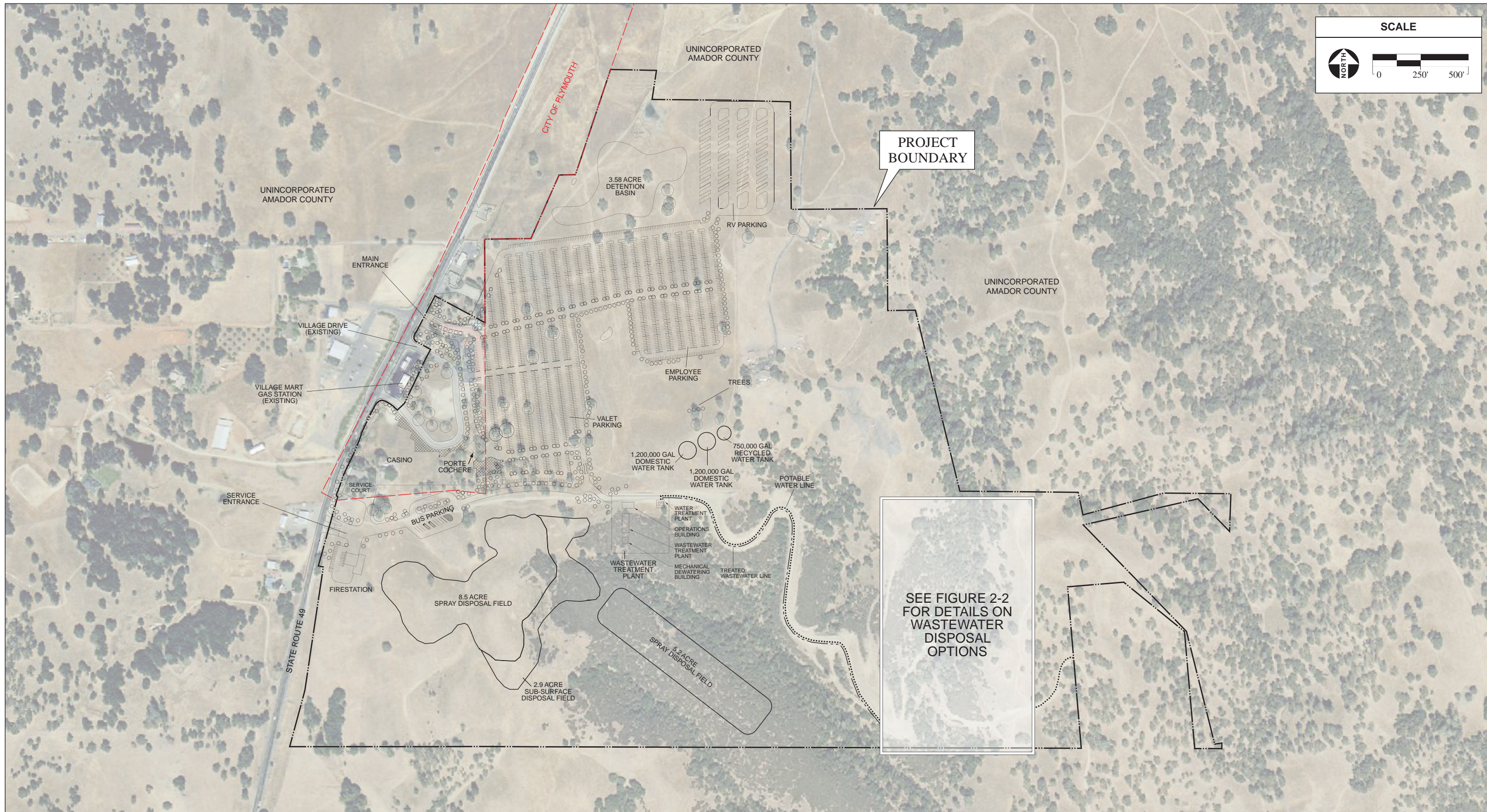




Figure 2-2
Alternative A (Phase I) Architectural Rendering

Using a generation factor of one parking space per gaming position, Phase I of Alternative A would provide a total of 2,240 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 east of the main casino. The smaller parking area would provide additional self parking spaces and also incorporate a bus loading area. Approximately 25 percent of the parking spaces would be sized to accommodate compact vehicles. 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 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 where applicable to prevent light pollution onto neighboring properties with non-commercial land uses~~ 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 (City). 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

The total water demand for Phase I of Alternative A would be 160,200 gallons per day (gpd). This demand includes water use within the casino, cooling tower water use, and landscape irrigation. Refer to Table 2-6 of **Appendix B** for a component breakdown of the water demands for Phase I of Alternative A. The total water demand represents the total amount of water anticipated to be used for Phase I of Alternative A, without differentiating between potable and non-potable water uses.

As discussed under *Wastewater Treatment and Disposal*, recycled water would be used to meet the non-potable water demands of Phase I of Alternative A. Recycled water would be used within the toilets, urinals, and cooling towers of the casino development and for 100 percent of the landscape irrigation demands. This would account for 52,200 gpd of the total water demand of Phase I of Alternative A. Refer to Section 2.3.2 of **Appendix B** for a description of the recycled water demands for Alternative A.

Based on the reductions associated with the use of recycled water, operation of Phase I of Alternative A would require 98,000 gpd of potable water. This would represent the daily amount of water needed from a potable water source to meet the total water demands of Alternative A. To provide Phase I of Alternative A with an adequate potable water supply, two options have been proposed, with Option 2 as the preferred option:

Water Supply Option 1

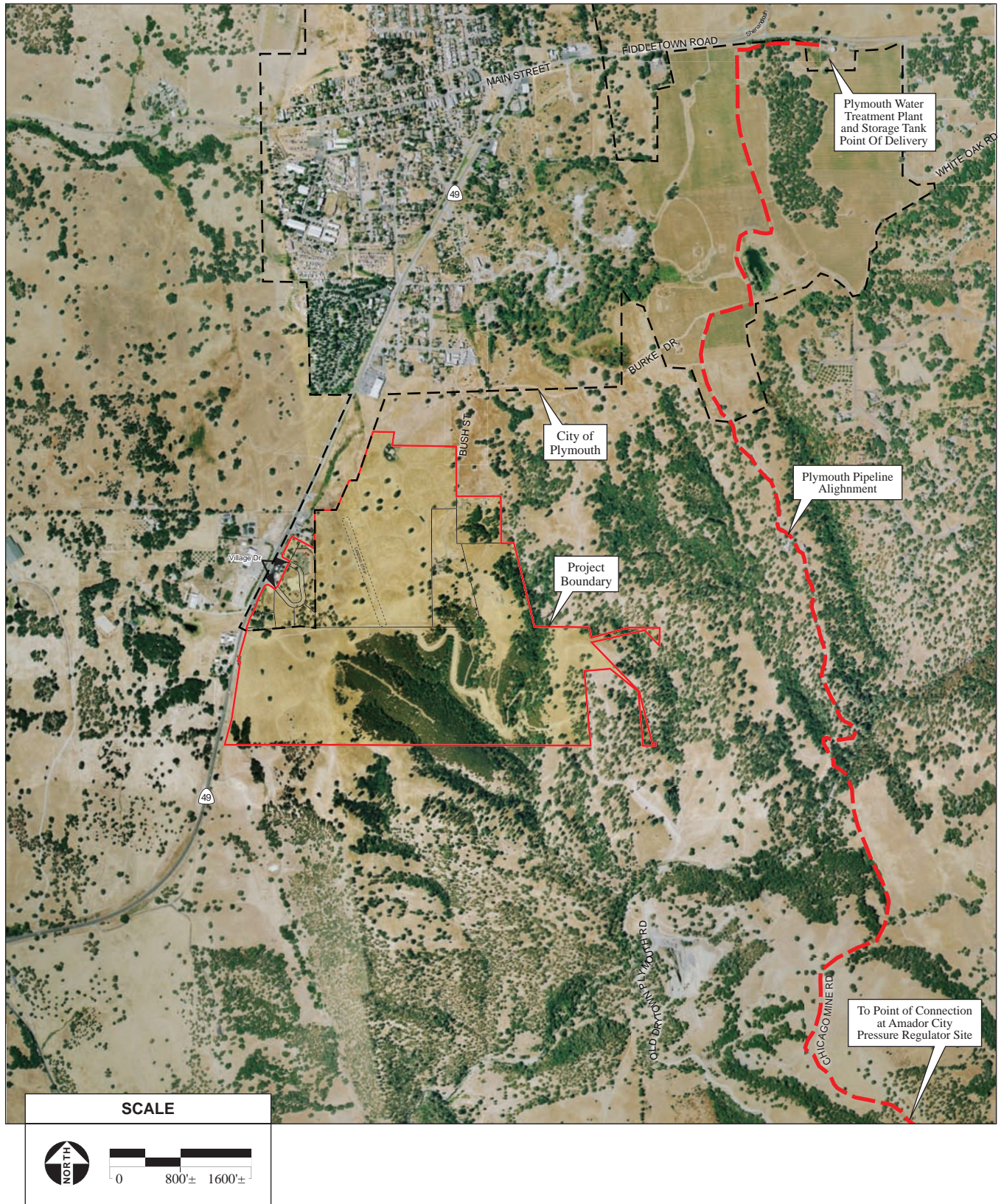
If water supply is available and the Tribe and the City enter into an agreement, the potable water demand for Phase I would be met by the City's municipal water supply. The use of the City's water supply will become a viable option when the City and Amador Water Agency (AWA) complete the planned Plymouth 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 would serve to meet the water demand estimates of the City for the year 2025 (City of Plymouth, 2006). The City has included the proposed projects land use density in its recent Water Supply Assessment that is scheduled to be distributed to the public at the end of November, 2008 (Howell, pers. comm., 2008). However, there is no agreement between the City and the Tribe to provide water to meet the potable water demands of Phase I of Alternative A

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).

Water Supply Option 2 (Preferred Water Option)

Based on the lack of existing capacity of the City's municipal water system and lack of agreement between the City and the Tribe regarding future water supplies (refer to **Section 3.3** regarding the Plymouth Pipeline project), the Tribe has selected to meet potable water demands through groundwater development as the Preferred Water Option.

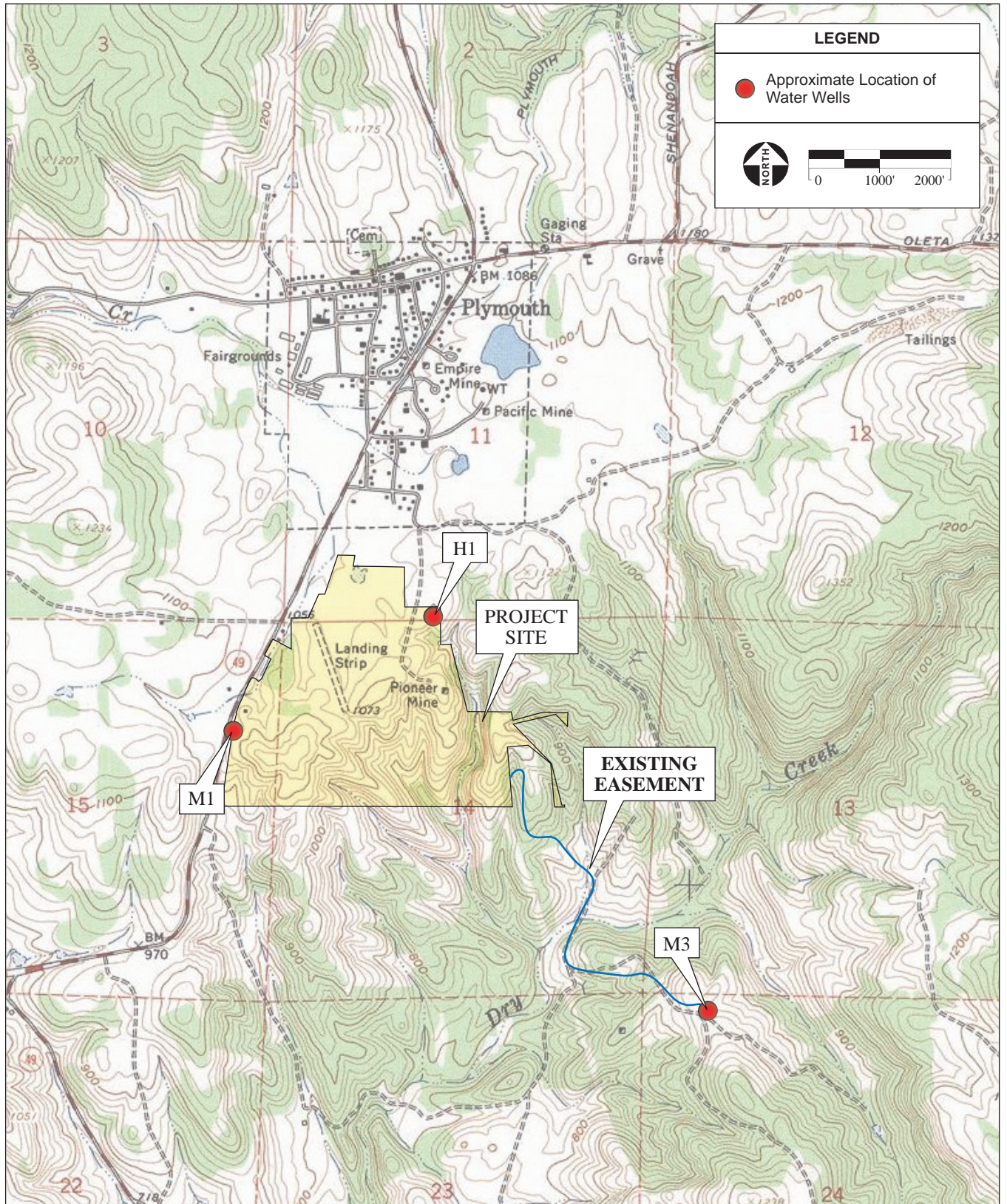
Water supplied under the Preferred Water Option during Phase I would be provided by groundwater wells. As identified in **Figure 2-4**, two groundwater wells are located on the project site (designated as M1 and H1), and one well is located adjacent to the project site (designated as M3). Any unused well on the project site would be abandoned per Part III, Section 23 of the California Department of Water Resources' California Well Standards, Bulletin 74-90 (DWR, 1991). Water from the off-site well would be delivered to the site via an existing pipeline located within a 60-foot wide easement, which currently is utilized as a gravel roadbed. Based on pumping tests (**Appendix B**), the total sustained yield of the groundwater wells is estimated to be approximately 116,640 gpd (81 gallons per minute). The three wells would be pumped in rotation to allow the groundwater reservoirs to recharge between pumping periods. The rotational scheme would entail pumping of the higher producing wells during times of peak occupancy (such as evenings during summer months on weekdays and weekends). During times of low occupancy (such as overnight during the winter during weekdays) the lower producing wells would be pumped. To meet average and peak hour demands with the use of a rotational pumping schedule, water would be pumped to two 1.0 million gallon water tanks located to the



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

Ione Band of Miwok Indians EIS / 203525 ■

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



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

Ione Band of Miwok Indians EIS / 203525 ■

Figure 2-4

Groundwater Wells and Water Supply Easement

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.

Prior to public use, the United States Environmental Protection Agency (USEPA) would require the Tribe to submit baseline groundwater quality data to ensure compliance with the Safe Drinking Water Act (SDWA). Under the SDWA, the project site would be considered a non-transient, non-community public water system. To ensure a safe public water system, the USEPA would require the Tribe develop a water monitoring plan to ensure continued safety for public and employee consumption. Based on preliminary water quality samples from the groundwater wells, an on-site reverse osmosis water treatment plant would be developed so that potable water supplied to Alternative A from groundwater wells meets all SDWA standards. The water treatment plant would be constructed prior to baseline monitoring for submittal to the USEPA. 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. 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 Tribe would pay the applicable fees for disposal, commensurate with a commercial project the size of Alternative A.

With the inclusion of the water treatment plant, the Preferred Water Option would result in a loss of 10,000 gpd from brine production. This would require a groundwater supply of 108,000 gpd to meet potable water demands, which accounts for 93 percent of total firm yield of all three groundwater wells combined. During Phase I, sufficient capacity within the firm well yield is available to meet the potable water demand.

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. Based on unit treatment capacity and 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. The WWTP would treat wastewater produced by the project site facilities and would not service additional flows beyond those identified for this alternative.

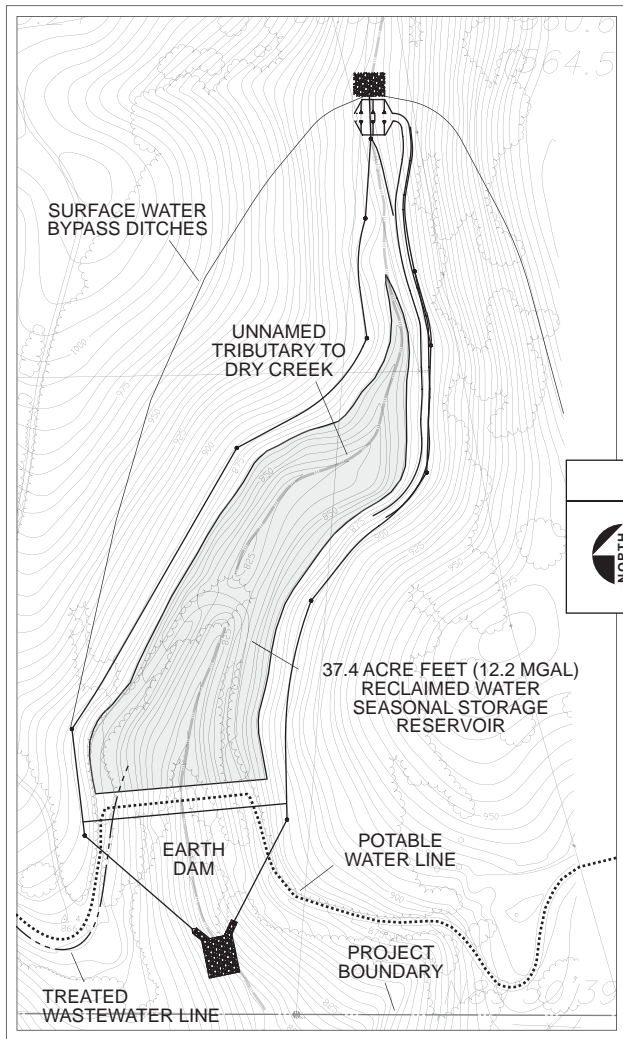
Wastewater would be treated in the WWTP to a level that meets the Title 22 of the California Code of Regulations, Division 4, Chapter 3, Water Recycling Criteria (Title 22) standards (Title 22 Standards) definition of tertiary treated recycled water (recycled water), which include a number of guidelines for production, distribution, and use of recycled water. One hundred percent of wastewater flows would be treated to this level, making 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 WWTP 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. 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~~ Similar to Title 22 standards Standards, project facilities would be dual-plumbed to provide separation of potable water and recycled water lines. Refer to **Appendix B** for a full description of the proposed WWTP.

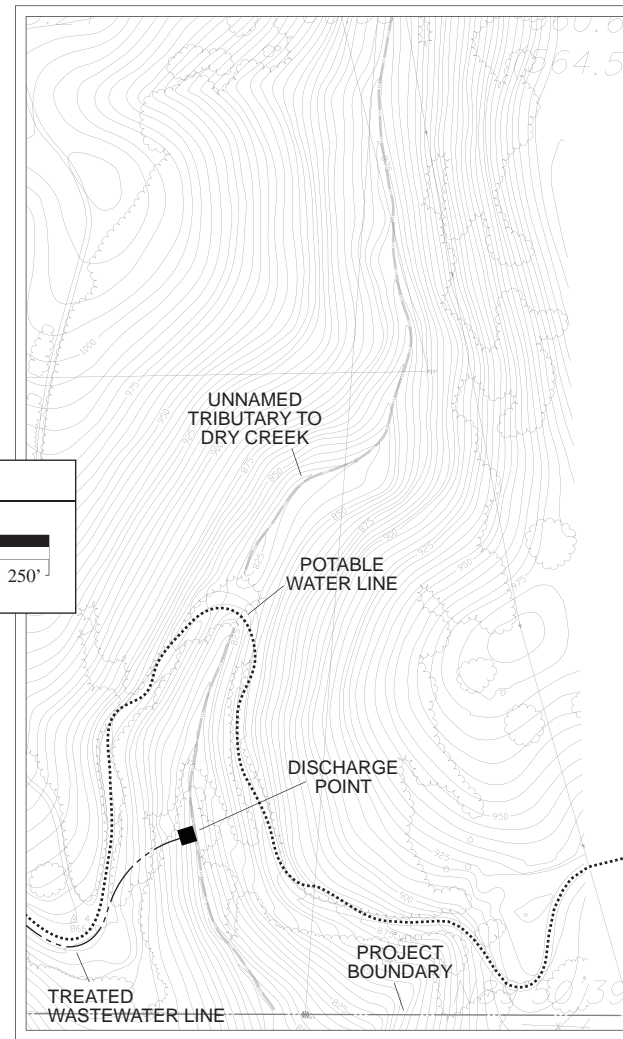
Based on the topography and existing conditions of the project site, two options were reviewed to meet the wastewater disposal requirements for Alternative A, development of a storage reservoir and permitted discharge to surface waters (**Figure 2-5**). After consultation with the USEPA, the Tribe has selected surface water discharge as the preferred disposal option for Alternative A.

Wastewater Disposal Option 1

Under Option 1 treated wastewater would be discharged ~~in the summer~~ during dry weather through landscape irrigation, sprayfields, and subsurface disposal through leachfields (**Figure 2-5**). During ~~the winter~~ wet weather, 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 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.



WASTEWATER DISPOSAL OPTION 1
SEASONAL STORAGE RESERVOIR



WASTEWATER DISPOSAL OPTION 2
SURFACE WATER DISCHARGE POINT

Wastewater Disposal Option 2 (Preferred Disposal Option)

Under the Preferred Disposal Option, treated wastewater would be disposed of during ~~the summer~~dry weather through landscape irrigation, sprayfields, and subsurface disposal through leachfields and during the ~~winter~~wet season through surface water discharge (**Figure 2-5**). 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~~dry season. Treated wastewater would be monitored to determine that USEPA requirements are continually met. A 3-inch diameter pipe will transport the treated wastewater from the WWTP to the discharge site, which would include a velocity dissipation structure to prevent erosion.

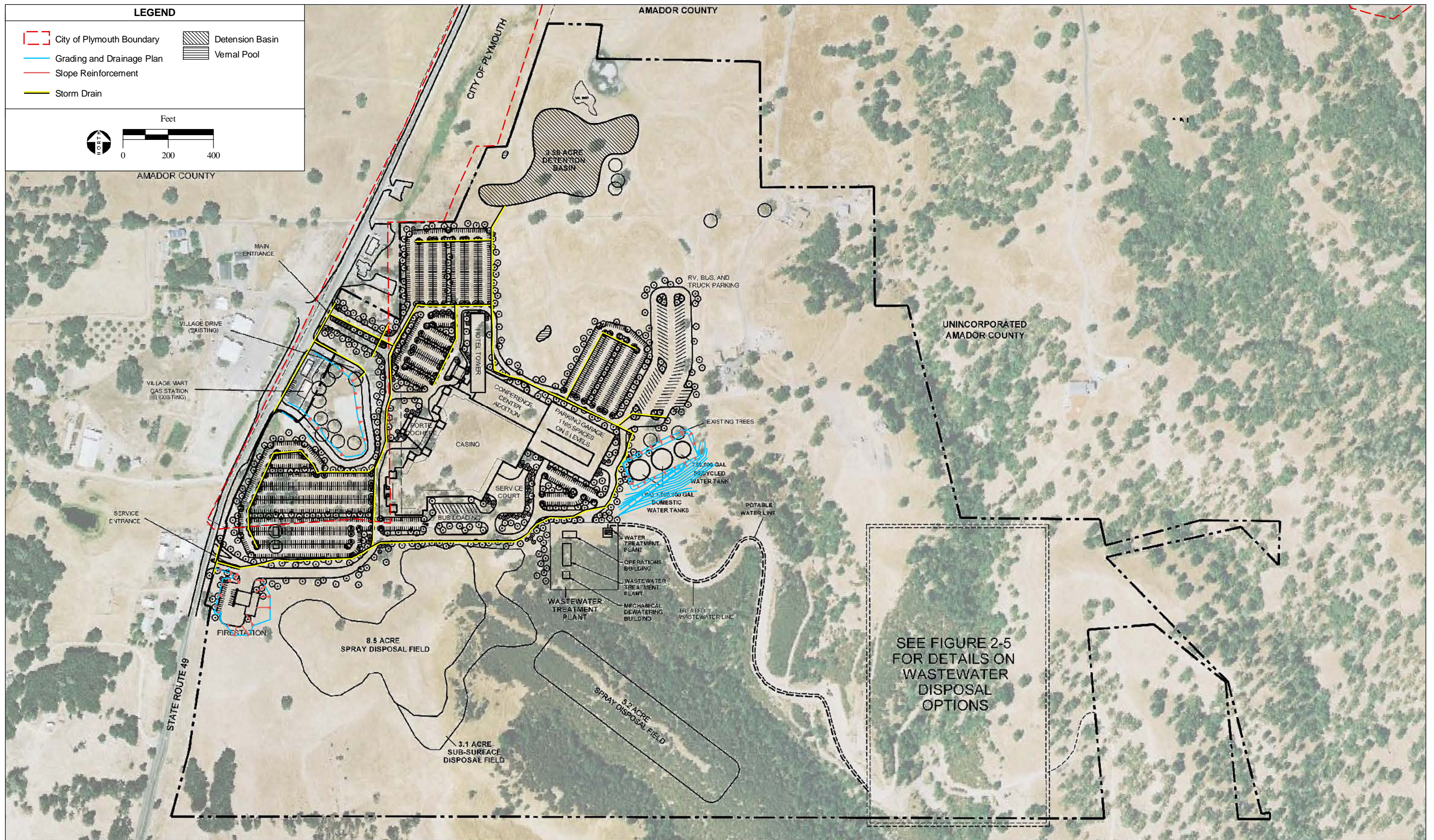
Landscaping and Utilities

Existing native and non-invasive trees and other vegetation would be preserved through minimizing the areas of disturbance to the general area of the development footprint. Landscaping within disturbed areas would include plant material that is native or completely naturalized to the region. None of the plants would be an invasive species. All of the islands and other planting areas within and adjacent to the surface parking lots would be landscaped, shading portions of the parking pavement. The planting scheme for Alternative A would be designed to blend the development and hardscape structures into the surrounding natural landscape. Trees close into the buildings would soften the hard edges of the structures. Other native trees would be grouped and located to serve as screens, blocking auxiliary components of the development such as the WWTP, storage tanks, and service areas.

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. Lighting fixtures on the project site would be generally consistent with the City's design guidelines specified in the *1997 Downtown Revitalization Strategy*. Lighting features will be downcast where applicable to prevent light pollution onto neighboring properties with non-commercial land uses. ~~to decrease light impacts to the surrounding vicinity.~~ This downcast lighting produced will be directed away from surrounding areas and onto the project site. Signage identifying the entrances to the facilities would be the minimum size and have the minimum lighting required to safely advertise to vehicles along SR-49 the entrances to the development.

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 (Figure 2-6)**. The drainage plan includes the



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; American Aerial Mapping, 2003; Claybar Engineering, 2004; Thalden Boyd Emery Architects, 2008; AES, 2009

Lone Band of Miwok Indians EIS / 203525 ■

Figure 2-6
Alternative A - Grading and Drainage Plan

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 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. The proposed parking lots would be landscaped with mulched plantings or grass and would serve as bioretention areas to initially treat storm water runoff. 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 developed on-site to reduce increased peak flows that would result from the introduction of impervious surfaces. 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 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 install security cameras and would employ security personnel to provide surveillance of the casino, parking areas, and surrounding grounds. The security cameras will provide coverage of all surface parking areas and exterior areas of the casino and facility support buildings. Security tapes shall be archived in a six-month rotation and may be provided to law enforcement agencies upon request. 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 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 equipped with 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). The Tribal Fire Department would be staffed, at a minimum, of three persons, 24 hours a day. 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. Adequate fire department connections would be developed through Alternative A based on the size and spacing between buildings. The final number of fire department connections shall be based on consultation with the fire marshal.

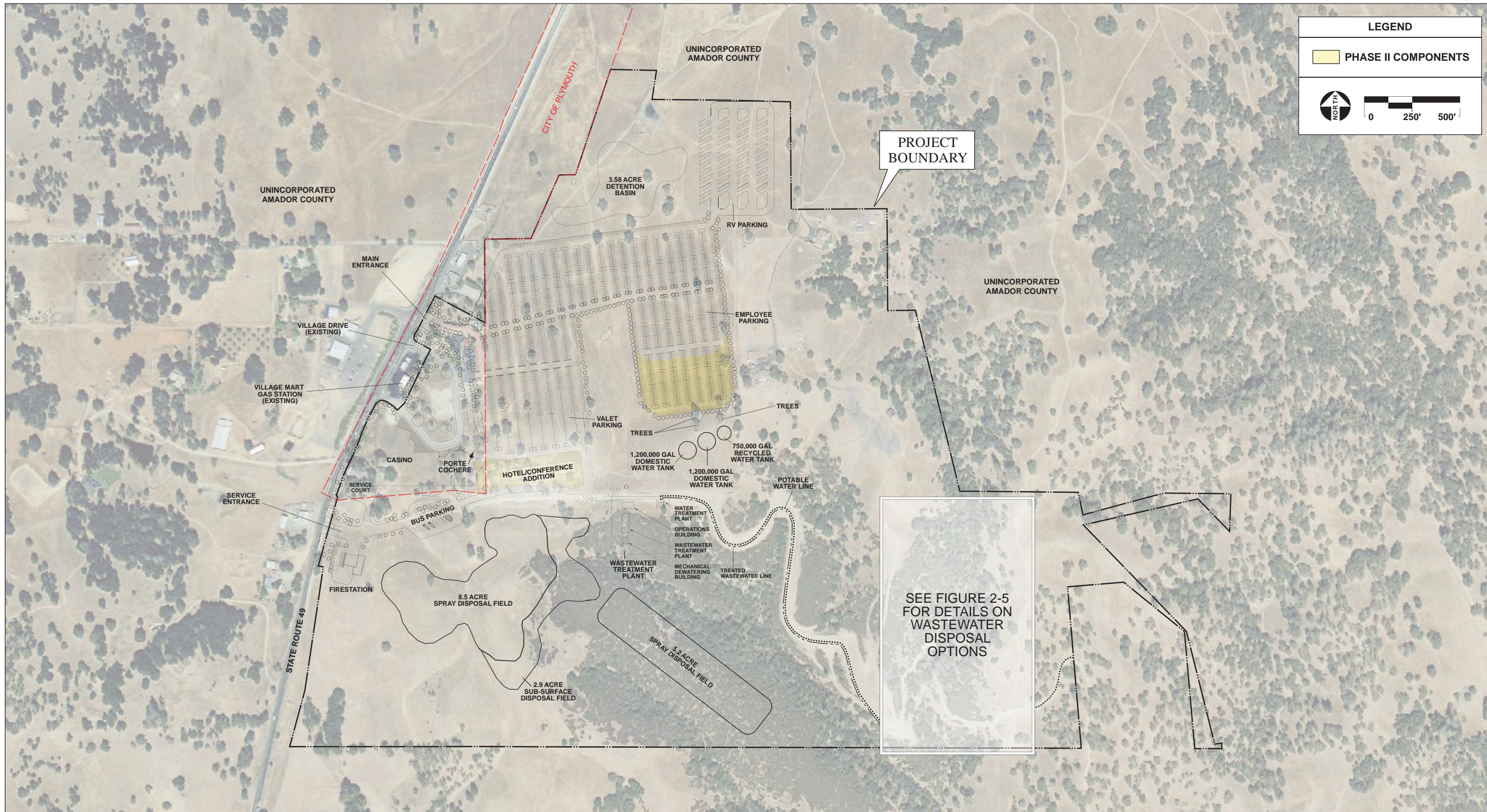
The fire station would include apparatus bays, administrative offices, a conference room, staff rooms, and operation support facilities. Other amenities of the fire station would include a staff parking area, downcast exterior lighting, and landscaping. Water delivery to the fire station would be provided 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 approximately three years after the opening of Phase I to the public. 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. 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 725 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 2,965 spaces, including the original 40 RV spaces and 11 bus spaces. Approximately 25 percent of the total parking spaces for full build-out of Alternative A would be sized to accommodate compact vehicles.

Water Demand and Supply

Phase II would result in an additional total water demand of 28,300 gpd, resulting in a full build-out water total 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 to meet non-potable water demands for Phase II, full build-out potable water demand would be 116,700 gpd. Increased water demand would be met by the option selected during development of Phase I.

Under Water Supply Option 1, if the Tribe and the City enter into an agreement for water service during Phase I, the increase in water demands after development of Phase II would be met by the City’s municipal water supply.

Under the Preferred Water Option, water trucking would be required to meet the increased potable water demands. As discussed under Phase I, total sustained groundwater yields of the wells is estimated to be approximately 116,640 gpd. Taking into account loss from brine production during water treatment, Phase II would require a total groundwater supply of 126,700 gpd to meet projected potable demands. With the use of recycled water, 92-percent of the potable water demand would be met by the groundwater wells. Water trucking would provide the remaining 8-percent of potable water to meet water demands. This would equate to five deliveries of a 2,000-gallon water truck per day.

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 Title 22 ~~standards~~ Standards for recycled water, which would 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, the Preferred Disposal Option (Wastewater Disposal Option 2) would consist of surface water discharge or a combination of surface water discharge and ground disposal. If the Tribe cannot obtain a NPDES permit for surface water discharge, Option 1 would have been initiated during Phase I and would utilize a combination of sprayfields, ground disposal, and reservoir storage.

Landscaping and Utilities

Landscaping features, utility lines, and lighting/signage for the hotel and conference center would be developed in a similar manner as described under Phase I.

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 security cameras and 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 would be abandoned by residents and may be used by the Tribe as Tribal government facilities.

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 there are no associated structures. 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 Development and Management Contract; and (3) development of a 100,750 square-foot casino. Phase II will add a 5-story, 166,500 square foot hotel and 30,000 square foot event and conference center 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.

Development and Management Contract

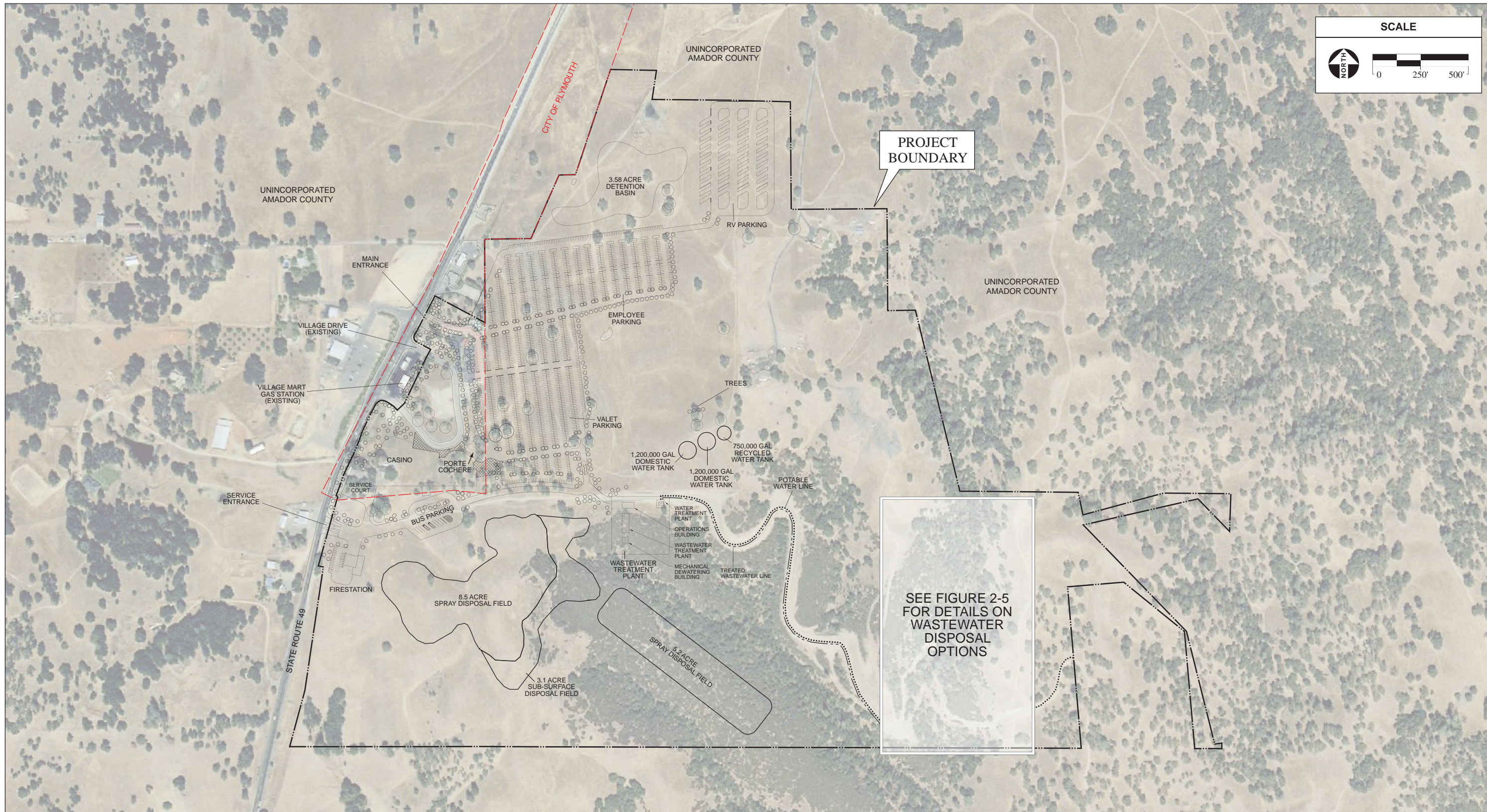
This action is identical to that described under Alternative A. The NIGC would review the Tribe's management contract in accordance with the authoritative provisions as authorized under IGRA (25 U.S.C. §2701 *et seq.*). Please refer to the development and management contract discussion under Alternative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

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 1,680 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. Approximately 25 percent of the parking spaces would be sized to accommodate compact vehicles. As with Alternative A, 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.

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
<i>Buffet</i>	250 Seats	
<i>Specialty Restaurant</i>	100 Seats	
<i>Coffee Bar</i>	10 Seats plus Counter	
<i>Sports Bar</i>	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.

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 total water demand of 139,800 gpd, 87-percent of the demand of Phase I of Alternative A. With the use of recycled water within the casino complex, potable water demand would be 86,500 gpd. To provide Phase I of Alternative B with an adequate potable water supply, two options have been proposed, with Option 2 as the preferred option:

Water Supply Option 1

Under Option 1, the total water demand, with or without the use of recycled water, would be met by the City municipal water supply as discussed under Alternative A, connecting to existing water lines in the vicinity of the project site.

Water Supply Option 2 (Preferred Water Option)

Water supplied under the Preferred Water Option during Phase I of Alternative B would be provided by the groundwater wells discussed under Phase I of Alternative A. The groundwater wells would be developed as described above under Phase I of Alternative A, using a rotational pumping scheme and storage tanks to meet average day and peak potable water demands. Any unused well on the project site would be abandoned per Part III, Section 23 of the California Department of Water Resources' California Well Standards, Bulletin 74-90 (DWR, 1991).

Prior to public use, the USEPA would require the Tribe to submit baseline groundwater quality data to ensure compliance with the SDWA. Under the SDWA, the groundwater supply system for Alternative B would be considered a non-transient, non-community public water system. To ensure a safe public water system, the USEPA would require the Tribe develop a water monitoring plan to ensure continued safety for public and employee consumption. Based on preliminary water quality samples from the groundwater wells, an on-site reverse osmosis water treatment plant would be developed so that potable water supplied to Alternative B from groundwater wells meets all SDWA standards. The water treatment plant would be constructed prior to baseline monitoring for submittal to the USEPA.

With the inclusion of the water treatment plant, the Preferred Water Option would result in a loss of 10,000 gpd from brine production. This would require a groundwater supply of 96,500 gpd to meet potable water demands, which accounts for 83 percent of total firm yield of all three groundwater wells combined. During Phase I, sufficient capacity within the firm well yield is available to meet the potable water demand.

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 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 Title 22 ~~standards~~Standards for recycled water. Recycled water to meet non-potable water demands 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. ~~In accordance with~~Similar to Title 22 standards, project facilities would be dual-plumbed to provide separation of potable water and recycled water lines. The WWTP for Alternative B would also be constructed to provide an average day capacity of 200,000 gpd taking into account design of the modular units and 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.

Based on the topography and existing conditions of the project site, two options were reviewed to meet the wastewater disposal requirements for Alternative A, which are the same as those

described under Alternative A. After consultation with the USEPA, the Tribe has selected surface water discharge as the preferred disposal option for Alternative B.

Wastewater Disposal Option 1

Under Option 1, treated wastewater would be discharged in the same manner as described under Alternative A. Treated wastewater would be discharged ~~in the summer~~ during dry weather through landscape irrigation, sprayfields, and subsurface disposal through leachfields (**Figure 2-9**). During ~~the winter~~ wet weather, treated wastewater would be stored ~~through the winter months~~ in an on-site reservoir until the following summer. Please refer to the description of wastewater treatment and disposal under Phase I of Alternative A for more detail.

Wastewater Disposal Option 2 (Preferred Disposal Option)

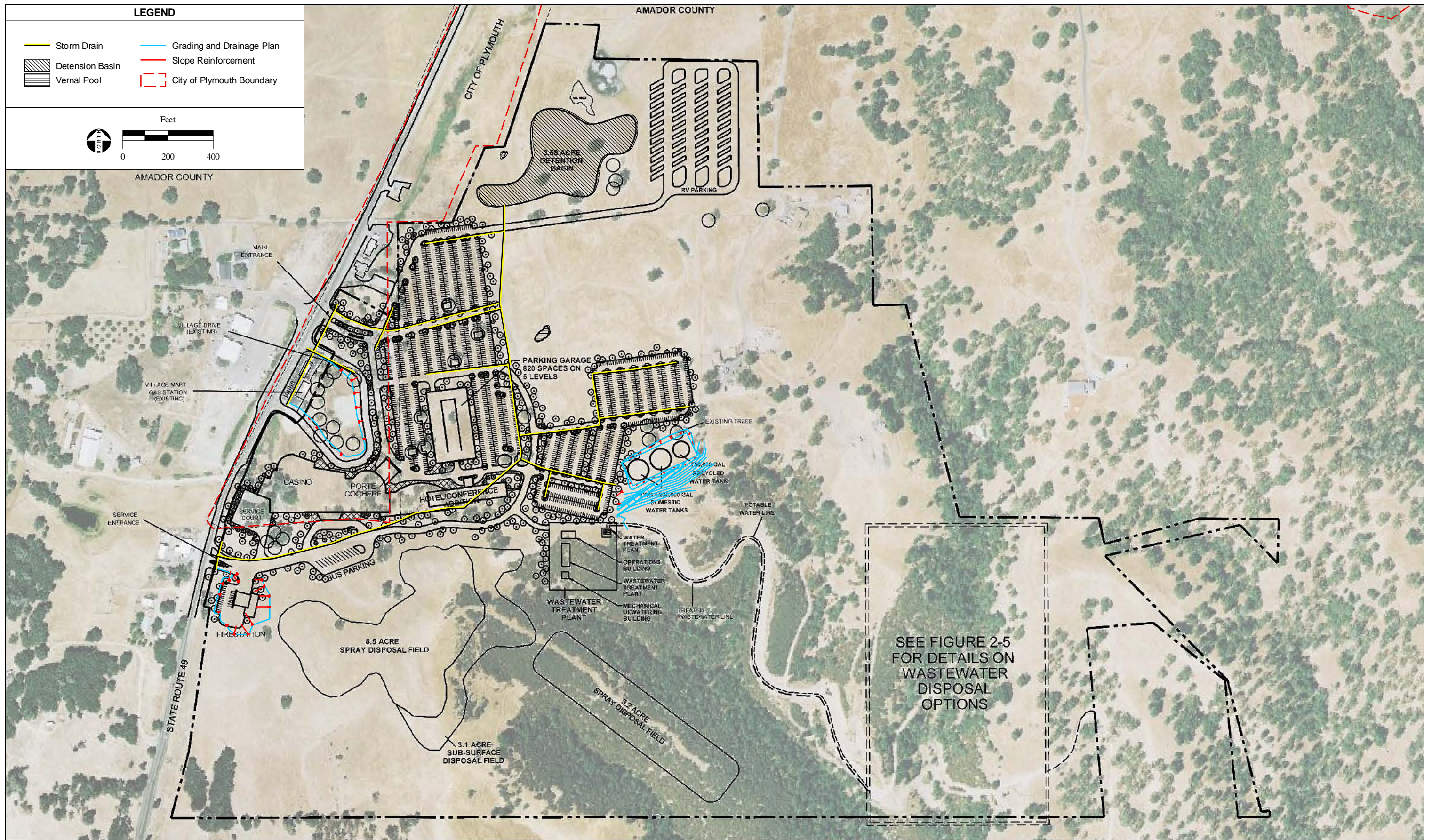
Under Option 2, treated wastewater would be discharged in the same manner as described under Alternative A. Treated wastewater would be disposed of during ~~the summer~~ dry weather through landscape irrigation, sprayfields, and subsurface disposal through leachfields and during ~~the winter~~ wet weather through surface water discharge (**Figure 2-9**). 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. Refer to the description of wastewater treatment and disposal under Phase I of Alternative A for more detail.

Landscaping and Utilities

Landscaping, utility, and lighting/signage 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. Lighting fixtures on the project site would be generally consistent with the City of Plymouth design guidelines specified in the *1997 Downtown Revitalization Strategy*. Signage identifying the entrances to the facilities would be minimum size and have the minimum lighting required to safely advertise to vehicles along SR-49 the entrances to the development. 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.



SOURCE: Airphoto USA Aerial Photograph, 11/1/2002; American Aerial Mapping, 2003; Claybar Engineering, 2004; Thalden Boyd Emery Architects, 2008; AES, 2009

Lone Band of Miwok Indians EIS / 203525 ■

Figure 2-11
Alternative B - Grading and Drainage Plan

Security/Law Enforcement

Under Alternative B, the Tribe would install security cameras and employ security personnel to provide surveillance of the casino, parking areas, and surrounding grounds. The security cameras would provide coverage of all surface parking areas and exterior areas of the casino and facility support buildings. Security tapes would be archived and may be provided to law enforcement agencies upon request. Tribal security personnel would work cooperatively with the ACSO, which provides general law enforcement services to the City 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

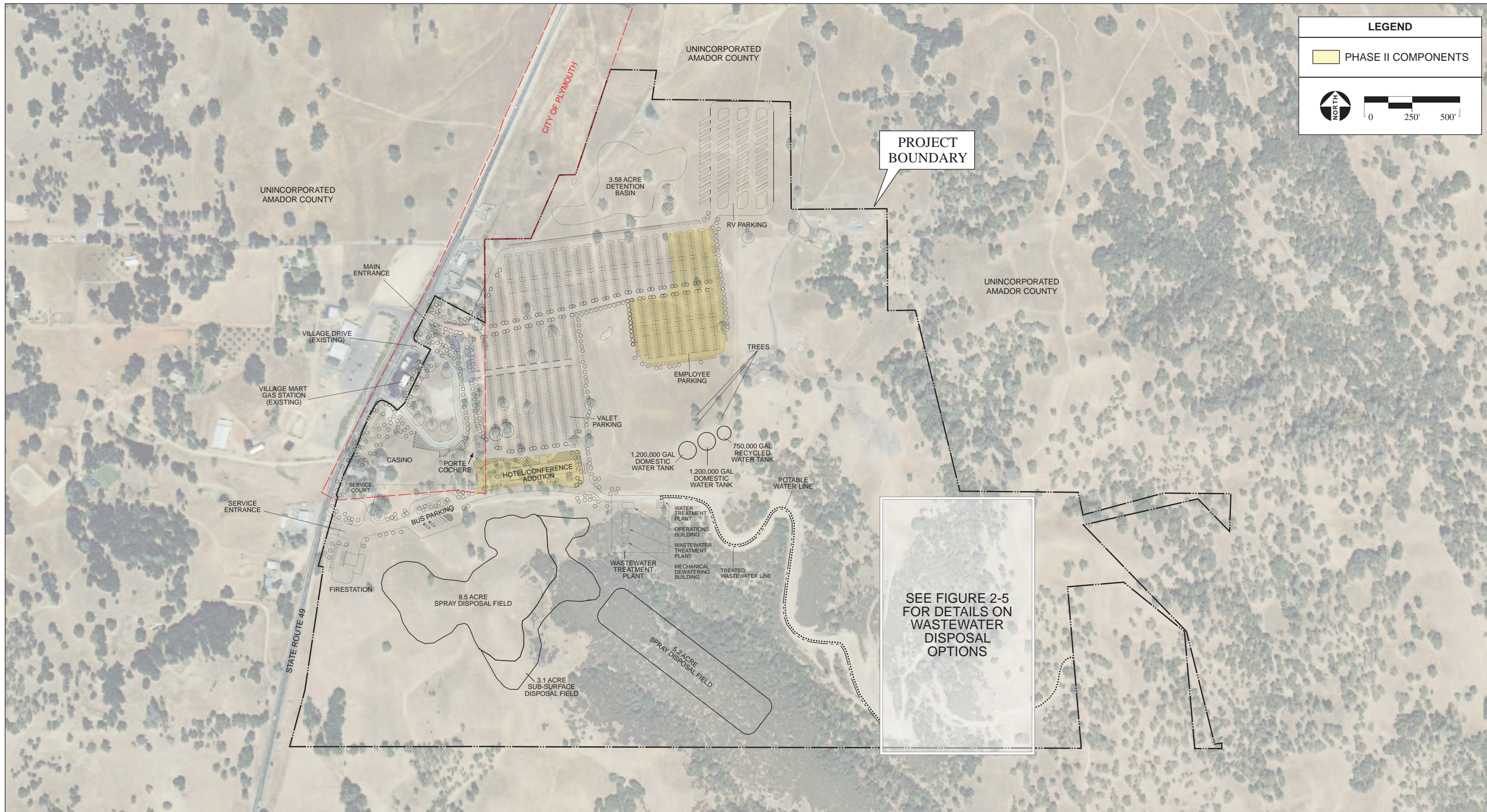
Phase II would add a 5-story, 250-room hotel and 30,000 square foot event and conference center that would be connected to the south end of the casino. The exact timing of the hotel development is unknown at this time; however, for the purposes of this analysis, it is assumed that the hotel would be 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 approximately 91 additional positions, resulting in a total employment of 1,192 for the full build-out of Alternative B.

Event and 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.





Ancillary Components

Site Access and Parking

With the development of Phase II, the total parking spaces would increase to 2,405 stalls, including the 40 RV parking stalls and 11 bus parking areas (**Figure 2-12**), 81-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. Approximately 25 percent of the total parking spaces for full build-out of Alternative B would be sized to accommodate compact vehicles. 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 total water demand of 28,300 gpd, resulting in a full build-out total water demand for Alternative B of approximately 168,100 gpd, an increase of approximately 20-percent from the sole operation of Phase I. With the use of recycled water to meet non-potable water demands, full build-out potable water demand would be 104,000 gpd. The potable water demand would be met by the option selected during development of Phase I.

Under Water Supply Option 1, if the Tribe and the City enter into an agreement for water service during Phase I, the increase in water demands after development of Phase II would be met by the City of Plymouth's municipal water supply.

Under the Preferred Water Option, potable water demands would be met by the developed groundwater system. As discussed under Phase 1, total sustained groundwater yields of the wells is estimated to be approximately 116,640 gpd. Taking into account loss from brine production during water treatment, Phase II would require a total groundwater supply of 114,000 gpd to meet projected potable demands, accounting for 98 percent of total firm yield of all three groundwater wells combined. During Phase II, sufficient capacity within the firm well yield is available to meet the increased potable water demand.

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 Title 22 ~~standards~~Standards for recycled water, which would 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. If the Tribe cannot obtain a NPDES permit for surface water discharge, Option 1 would have been initiated during Phase I and would utilize a combination of sprayfields, ground disposal, and reservoir storage. As discussed above, the Preferred Disposal Option would consist of surface water discharge or a combination of surface water discharge and ground disposal.

Landscaping and Utilities

Landscaping features, utility lines, and lighting/signage for the hotel and conference center would be developed in a similar manner as described under Phase I.

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 security cameras and 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 would be abandoned by residents and may be used by the Tribe as Tribal government facilities used by the Tribe. 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

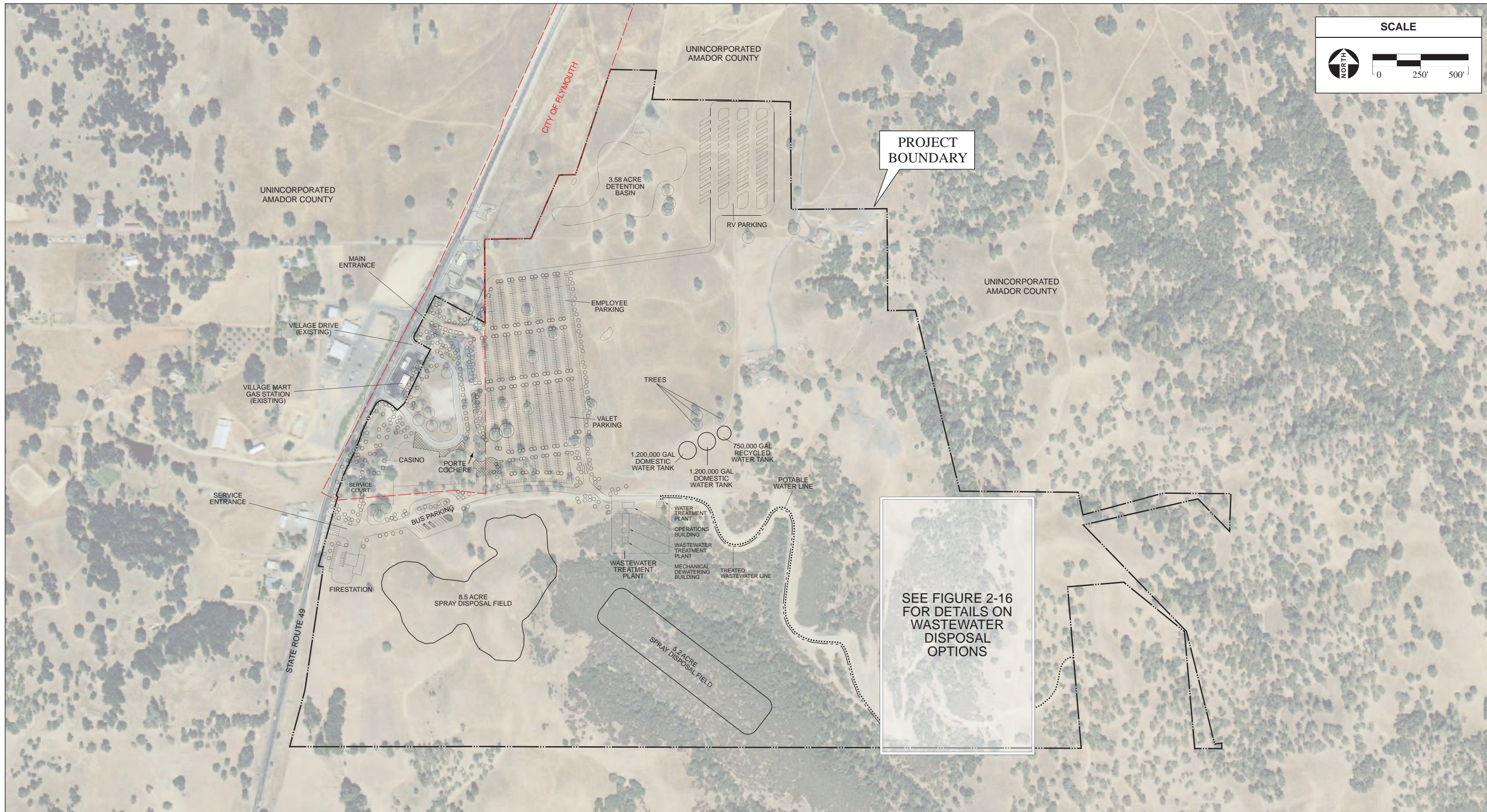
No other developments, such as Tribal housing or other commercial facilities, would occur on the project site. The WWTP is designed to provide treatment only for the facilities described above.

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 Development and Management Contract, and (3) casino development. No other developments, such as Tribal housing or other commercial facilities would be developed 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 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.

DEVELOPMENT AND 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
<i>Buffet</i>	250 Seats	
<i>Sports Bar</i>	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 1,120 spaces would be

provided, including 40 RV spaces and 11 bus spaces, accounting for 38-percent of the total spaces allotted for full build-out of Alternative A. Approximately 25 percent of the total parking spaces for Alternative C would be sized to accommodate compact vehicles. 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 total 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. With the use of recycled water within the casino complex, potable water demand would be 64,900 gpd. To provide Alternative C with an ~~adequate potable water supply, two options have been proposed, with Option 2 as the preferred option:~~ adequate potable water supply, two options have been proposed, with Option 2 as the preferred option:

Water Supply Option 1

If water supply is available and the Tribe and the City enter into an agreement, the potable water demand for Phase I would be met by the City's municipal water supply. Refer to the discussion of Option 1 under Phase I of Alternative A for more details.

Water Supply Option 2 (Preferred Water Option)

Water supplied under the Preferred Water Option of Alternative C would be provided by the groundwater wells discussed under Phase I of Alternative A. The groundwater wells would be developed using a rotational pumping scheme and storage tanks to meet average day and peak potable water demands. Any unused well on the project site would be abandoned per Part III, Section 23 of the California Department of Water Resources' California Well Standards, Bulletin 74-90 (DWR, 1991).

Prior to public use, the USEPA would require the Tribe to submit baseline groundwater quality data to ensure compliance with the SDWA. Under the SDWA, the groundwater supply system for Alternative C would be considered a non-transient, non-community public water system. To ensure a safe public water system, the USEPA would require the Tribe develop a water monitoring plan to ensure continued safety for public and employee consumption. Based on preliminary water quality samples from the groundwater wells, an on-site reverse osmosis water treatment plant would be developed so that potable water supplied to Alternative C from groundwater wells meets all SDWA standards. The water treatment plant would be constructed prior to baseline monitoring for submittal to the USEPA.

With the inclusion of the water treatment plant, the Preferred Water Option would result in a loss of 10,000 gpd from brine production. This would require a groundwater supply of 74,900 gpd to meet potable water demands, which accounts for 64 percent of total firm yield of all three groundwater wells combined.

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.

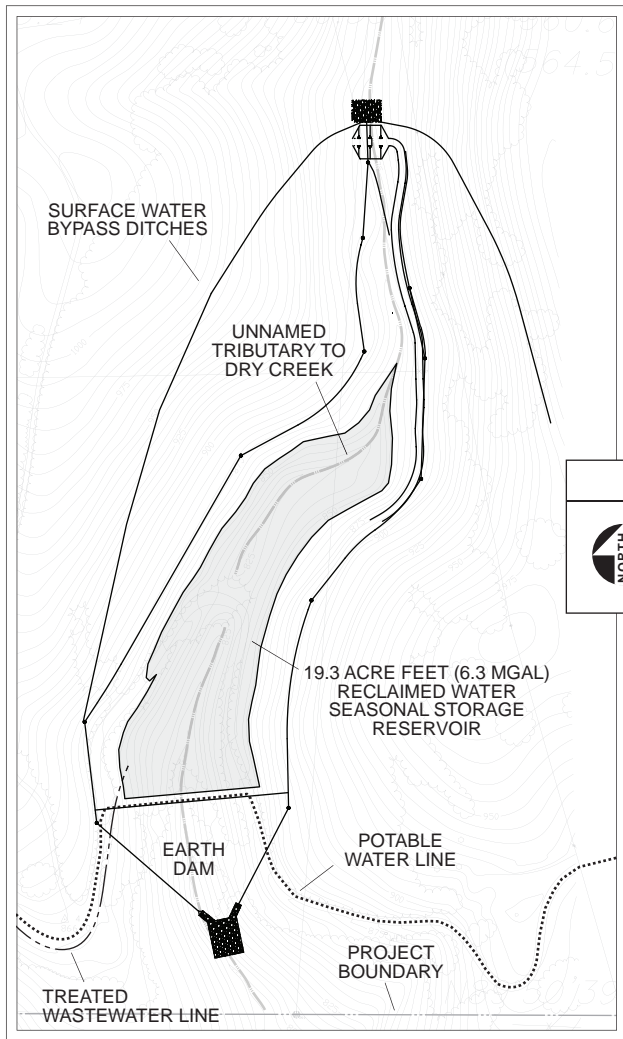
Based on the topography and existing conditions of the project site, two options were reviewed to meet the wastewater disposal requirements for Alternative C, development of a storage reservoir and permitted discharge to surface waters (**Figure 2-16**). After consultation with the USEPA, the Tribe has selected surface water discharge as the preferred disposal option for Alternative C.

Wastewater Disposal Option 1

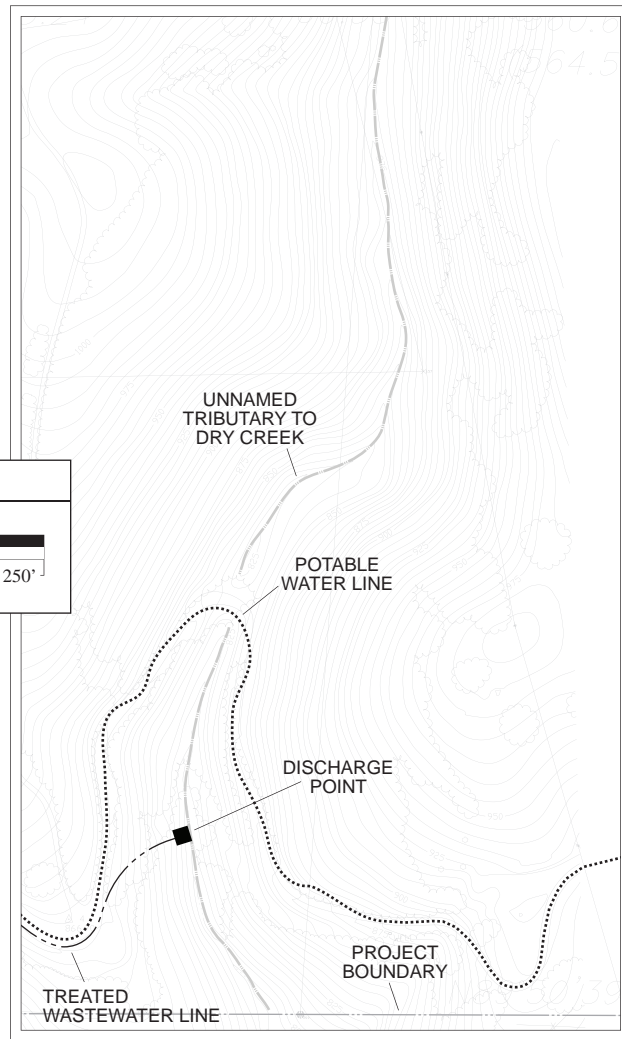
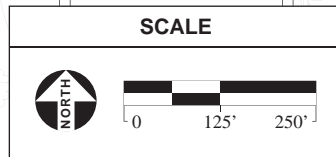
Under Option 1, treated wastewater would be discharged ~~in the summer~~ during dry weather through landscape irrigation, sprayfields, and subsurface disposal through leachfields (**Figure 2-16**). During ~~the winter~~ wet weather, treated wastewater would be ~~stored through the winter months~~ in an on-site reservoir until the following summer and disposal becomes viable (dry weather). 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 follow recommendations listed in **Appendix E**, which are hereby incorporated into the project description. This option would require that a 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.

Wastewater Disposal Option 2 (Preferred Disposal Option)

Under the Preferred Disposal Option, treated wastewater would be disposed of during the summer through landscape irrigation, sprayfields, and subsurface disposal through leachfields and during the winter through surface water discharge (**Figure 2-16**). Surface water discharge would occur



WASTEWATER DISPOSAL OPTION 1
SEASONAL STORAGE RESERVOIR



WASTEWATER DISPOSAL OPTION 1
SURFACE WATER DISCHARGE POINT

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. 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.

Landscaping and Utilities

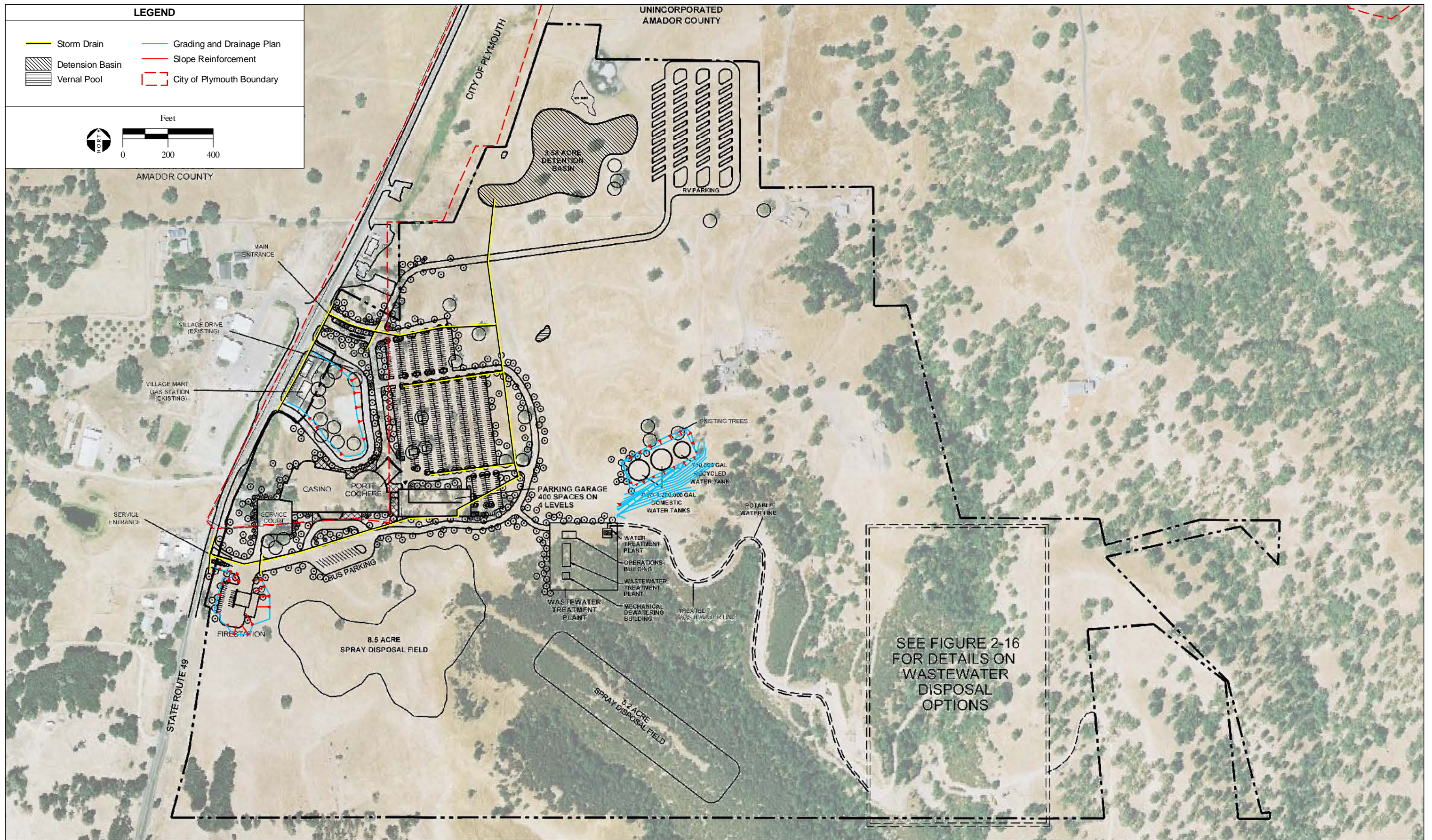
Landscaping and utility features would be similar to those described under Phase I of Alternative A. All landscaping features would be planted with non-invasive plant species with existing vegetation incorporated into site designs, where applicable. Lighting fixtures on the project site would be generally consistent with the City design guidelines specified in the *1997 Downtown Revitalization Strategy*. Signage identifying the entrances to the facilities would be minimum size and have the minimum lighting required to safely advertise to vehicles along SR-49 the entrances to the development. 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 install security cameras and employ security personnel to provide surveillance of the casino, parking areas, and surrounding grounds. The security cameras will provide coverage of all surface parking areas and exterior areas of the casino and facility support buildings. Security tapes shall be archived and may be provided to law enforcement agencies upon request. Tribal security personnel would work cooperatively with the ACSO, which provides general law enforcement services to the City 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 would~~ and would be abandoned by residents and may be used by the Tribe as Tribal government facilities used by the Tribe. 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, would occur on the project site. The WWTP is designed to provide treatment only for the facilities described above.

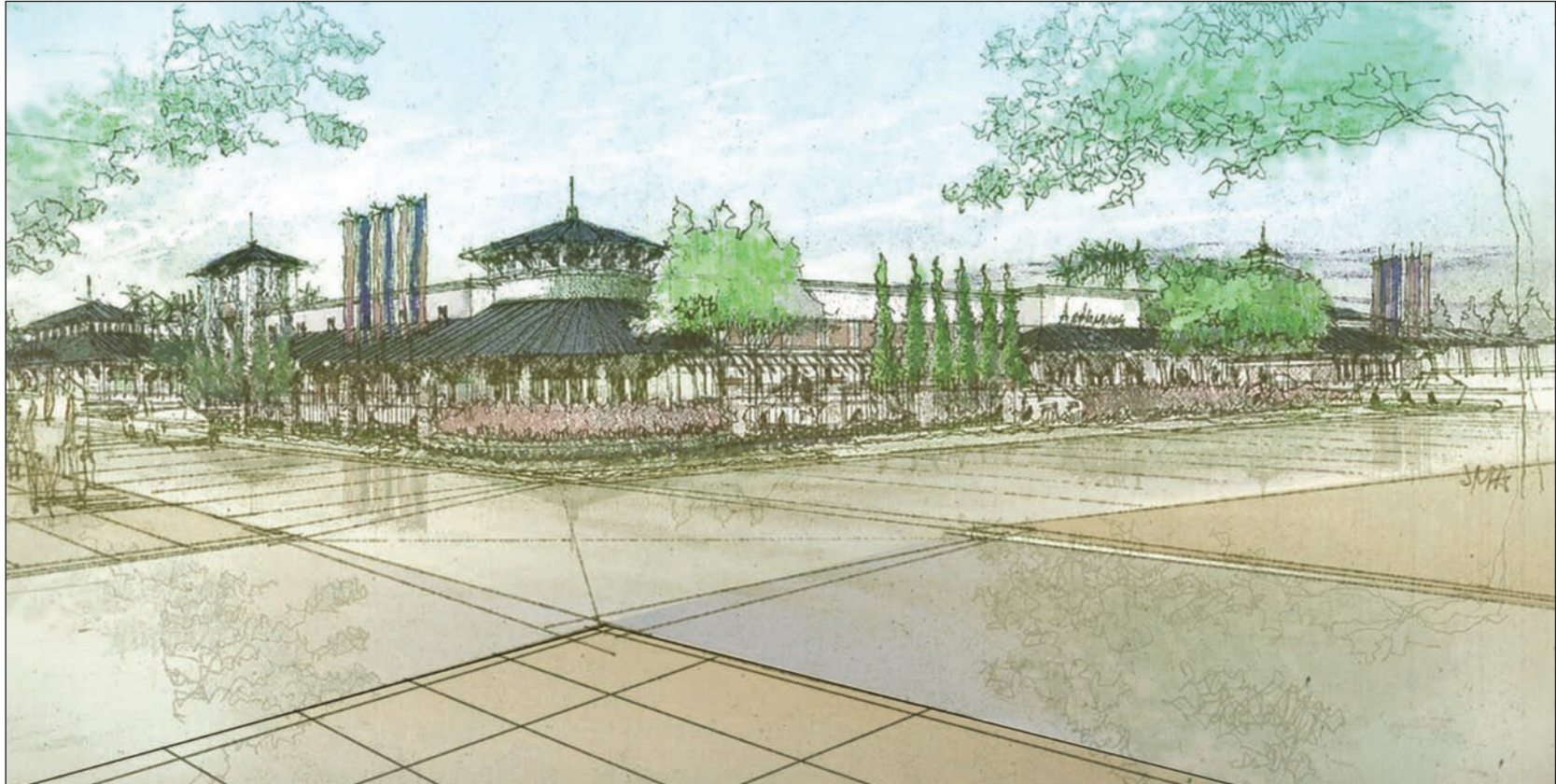
2.2.4 ALTERNATIVE D – RETAIL DEVELOPMENT

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 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 617 parking spaces (**Figure 2-18**), 21-percent of the allotted spaces for full build-out of Alternative A. Approximately 25 percent of the total parking spaces for Alternative D would be sized to accommodate compact vehicles. 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 where applicable to prevent light pollution onto neighboring properties with non-commercial land uses.

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. To provide Alternative D

with an adequate potable water supply, two options have been proposed, with Option 2 as the preferred option:

Water Supply Option 1

Water supplied from Option 1 of Alternative D would be provided by the City's municipal supply when the City and 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.

Water Supply Option 2 (Preferred Water Option)

Water supplied under the Preferred Water Option of Alternative C would be provided by the groundwater wells discussed under Phase I of Alternative A. The groundwater wells would be developed using a rotational pumping scheme and storage tanks to meet average day and peak potable water demands. Any unused well on the project site would be abandoned per Part III, Section 23 of the California Department of Water Resources' California Well Standards, Bulletin 74-90 (DWR, 1991).

Prior to public use, the USEPA would require the Tribe to submit baseline groundwater quality data to ensure compliance with the SDWA. Under the SDWA, the groundwater supply system for Alternative B would be considered a non-transient, non-community public water system. To ensure a safe public water system, the USEPA would require the Tribe develop a water monitoring plan to ensure continued safety for public and employee consumption. Based on preliminary water quality samples from the groundwater wells, an on-site reverse osmosis water treatment plant would be developed so that potable water supplied to Alternative C from groundwater wells meets all SDWA standards. The water treatment plant would be constructed prior to baseline monitoring for submittal to the USEPA.

With the inclusion of the water treatment plant, the Preferred Water Option would result in a loss of 10,000 gpd from brine production. This would require a groundwater supply of 44,400 gpd to meet potable water demands, which accounts for 38 percent of total firm yield of all three groundwater wells combined.

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. Lighting fixtures on the project site would be generally consistent with the City design guidelines specified in the *1997 Downtown Revitalization Strategy*. Signage identifying the entrances to the facilities would be minimum size and have the minimum lighting required to safely advertise to vehicles along SR-49 the entrances to the development. All utility lines would be placed underground.

Site Drainage

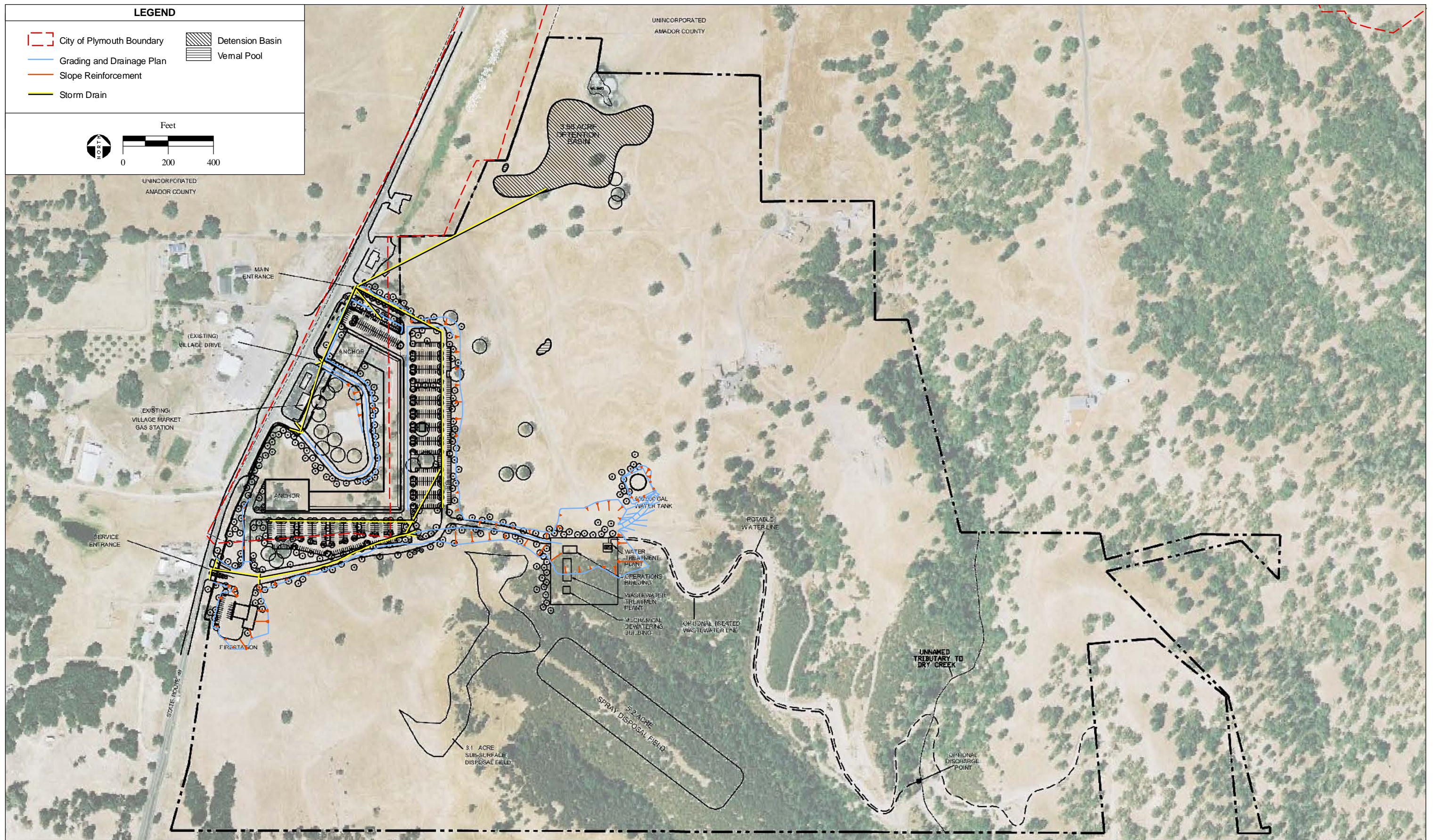
Runoff from the project site would be conveyed by a combination of open channels and culverts (**Figure 2-20**). As with Alternative A, the drainage plan includes the use of several features, including vegetated swales, “Stormceptor” sediment/grease traps, and a detention basin. The detention basin would 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 install security cameras and employ security personnel to provide surveillance of the retail outlet, parking areas, and surrounding grounds. The security cameras will provide coverage of all surface parking areas and exterior areas of the retail facilities and facility support buildings. Security tapes shall be archived and may be provided to law enforcement agencies upon request. Tribal security personnel would work cooperatively with the ACSO, which provides general law enforcement services to the City 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.



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

Lone Band of Miwok Indians EIS / 203525 ■

Figure 2-20
Alternative D - Grading and Drainage Plan

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 would be abandoned by residents and may be used by the Tribe as Tribal government facilities used by the Tribe. 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.

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.

2.2.5 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 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.~~ Based on the anticipated growth in the City's General Plan and completion of the Plymouth Pipeline project, Alternative E assumes the moratorium associated with wastewater and water supply 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's 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

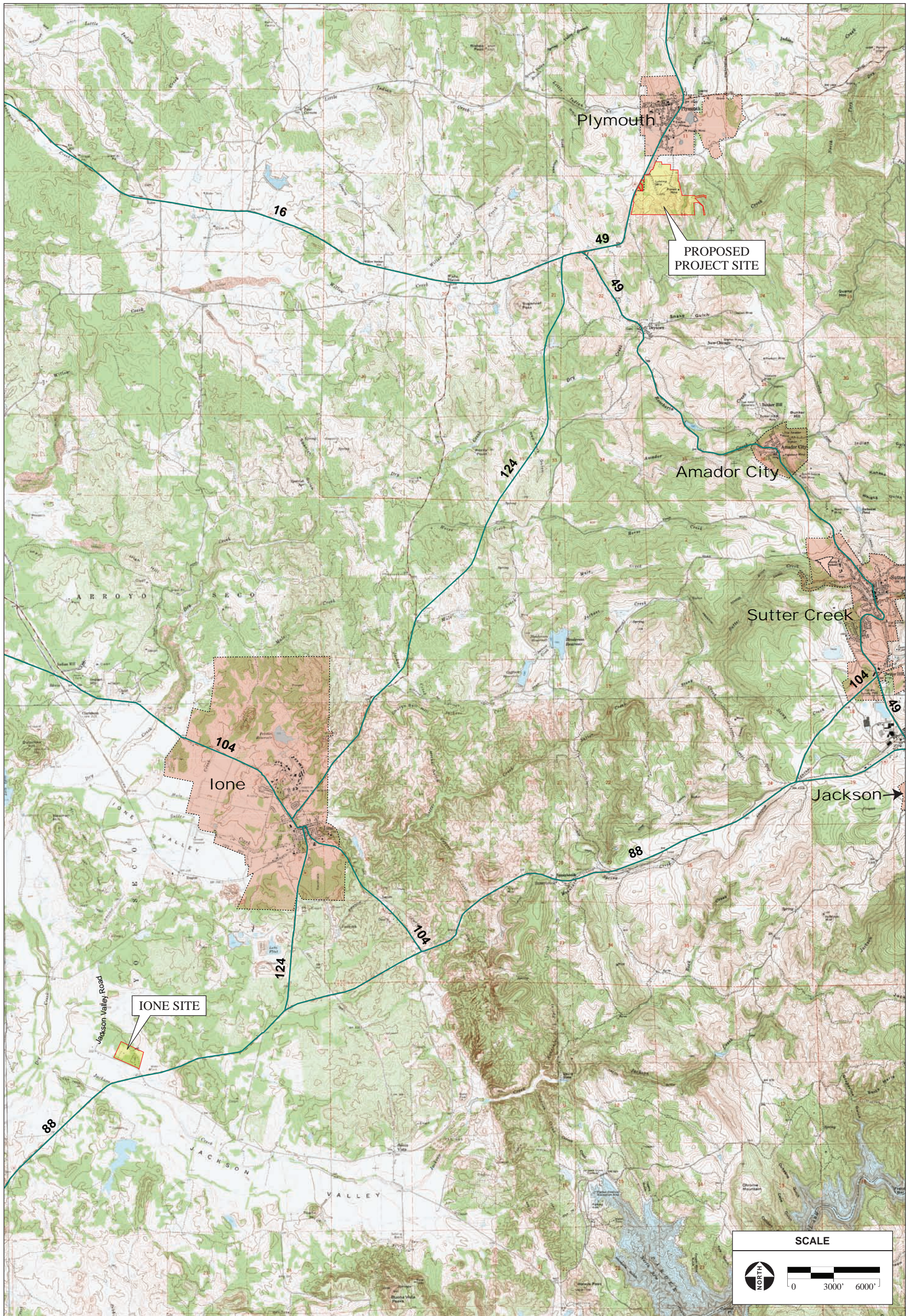
Prior to focusing on the Proposed Project site, the Tribe also considered another site in Amador County for development. As shown in **Figure 2-21**, the site is located on an approximately 40-acre parcel off Jackson Valley Road outside of the City of Ione in an unincorporated area of Amador County. 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. The Jackson Valley Road Parcel is characterized by predominantly forested area, scattered small developments, and some open spaces. The 40-acre site meets the minimum size requirement; however, the topography, existing conditions, and soil characteristics of the property make it unable to accommodate the casino and ancillary components, such as a reservoir or WWTP.

While the majority of the site has the level terrain required for the facility, there are substantial hills in the center and southern portions of the site. The hill in the center would restrict the facility to the edges of the property, limiting the amount of buffer between the casino and surrounding properties. The southern portion of the property is located in a designated Zone A flood zone (FEMA). Zone A is used to define an area that corresponds to the 100-year floodplains that are determined in the Flood Insurance Study by approximate methods. As addressed in **Section 4.3**, Federal Executive Order 11988 requires the BIA to evaluate federal actions taken in a floodplain. If an agency proposes to allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplain.

There are approximately seven residences currently located on the site. Displacing these existing residents from the property may not be possible. If the development were to occur on this site, trees and other vegetation would have to be cleared away. This would be a detrimental loss to the natural habitat and aesthetics of the area.

According to the National Resource Conservation Service (NRCS) Soil Report the majority of the soil is not ideal for construction. The soils are limited by their shrink-swell characteristics and tendency to corrode steel and concrete.



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 on the following pages.

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/ 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 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 potable water demands of 116,700 gpd with the use of recycled water 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~~ emissions from generated vehicle trips due to traffic improvements; effects to 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.

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 potable water demands of 116,700 gpd with 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.

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 potable water demands of 75,400 gpd with 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.

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.

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.

2.4 SELECTION OF THE PREFERRED ALTERNATIVE

Four development alternatives and the No Action alternative are described and analyzed within the Final EIS. Of these, Alternative A would best meet the purpose and need as described in **Section 1.2**. Alternative A would provide the Tribe with the best means of securing and maintaining a long-term, sustainable revenue stream. Both Alternative B with a reduced casino and Alternative C with a reduced casino and not hotel development would provide reduced benefits for the Tribe with regards to economic development and would not make the best use of the project site. Likewise, ~~the commercial/retail development alternatives~~ Alternative D would not provide the economic benefits associated with a casino, and with the rural setting, would be subject to competition with other retail developments closer to population centers.

Alternative A is the alternative that best meets the purpose and need and would result in a less than significant effect on the environment with the incorporation of mitigation identified in **Section 5.0** within this document. Therefore, Alternative A has been designated as the Preferred Alternative.