SECTION 2.0

ALTERNATIVES

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ALTERNATIVES

2.1 INTRODUCTION

This section describes the alternatives analyzed within this Environmental Impact Statement (EIS). A range of reasonable alternatives has been selected that includes seven development alternatives and a No Action Alternative. Consistent with Council of Environmental Quality (CEQ) Regulations (40 C.F.R. Section 1502.14), this section includes detailed discussion and comparison of the alternatives analyzed in this EIS.

Following the passage of the Graton Rancheria Restoration Act and the Tribe's decision to pursue gaming as a means to economic self-sufficiency, an extensive search took place to identify a property within Sonoma or Marin Counties that was environmentally and economically suitable for large-scale commercial development. The Tribe initially identified an approximately 2,000-acre property located in southern Sonoma County in the vicinity of State Route (SR)-37 and the Lakeville Highway (**Figure 1-1**). From an economic perspective this property was ideal, given its visibility and proximity to SR-37. After purchasing a lengthy option on the property, the Tribe and its proposed management partner, SC Sonoma Management, LLC, and its affiliates, began analyzing potential environmental constraints of the property. Environmental studies included drilling a test well to assess groundwater characteristics, conducting a water/wastewater feasibility analysis, and conducting preliminary surveys for hazardous materials, biological resources, cultural resources, traffic conditions, and geotechnical conditions (included as **Appendices G**, **D**, **S**, **J**, **K**, **M**, **O** and **F**).

As these various studies were underway, as part of a "pledge of cooperation," the Tribe widely publicized its intention to purchase the 2,000-acre property for use as a casino-hotel resort. The Tribe's efforts to inform and initiate a public dialogue about the potential gaming development included a number of town hall-style meetings in locations throughout Sonoma County. The Tribe held these meetings in order to gauge public reaction to a potential casino along SR-37 and to solicit public input on the appropriate scope and location of a casino. Soon after public notification of the Tribe's intentions and during the public meetings, the idea of a casino located along SR-37 was met with widespread community, environmental, and political opposition. Much of the opposition focused on the sensitive nature of the property, particularly the portion south of SR-37. Environmental interests were especially concerned that development of a casino on the property would interfere with the preservation and restoration of baylands along the northern edge of San

Pablo Bay. Other frequently raised concerns involved traffic impacts along SR-37 and visual impacts resulting from a large-scale commercial development.

Although the Tribe's own environmental constraints analyses were not yet completed, the decision was made to attempt to locate a more suitable and less controversial location for potential casino development. In November 2003 the Tribe donated its option on 1,679 acres of the original 2,000-acre site to the Sonoma Land Trust. The option was valued at approximately $4.2 million and included the most environmentally valuable portions of the 2,000-acre site located south of SR-37. The Sonoma Land Trust has since completed purchase of the 1,679-acre property and plans to begin restoration activities by 2010. The Tribe retained approximately 322 acres of the 2,000-acre site along Lakeville Highway (the Lakeville Site) in order to provide a viable alternative to the eventually proposed development site. The Lakeville Site is described in **Section 1.3.3** of this EIS.

The Tribe proceeded to search Sonoma and Marin Counties, in consultation with local governments, for an alternative property (see **Section 2.9.2**). The Tribe evaluated approximately 48 sites, eventually focusing on the Stony Point Site described in **Section 1.3.2** for potential development of a casino-hotel resort. The National Indian Gaming Commission (NIGC) published a Notice of Intent (NOI) (**Appendix A**) in the *Federal Register* on February 12, 2004, briefly describing the proposed action and announcing the NIGC's intent to prepare an EIS. The NOI proposed development of the casino project to be located in Sonoma County, California.

During the scoping period, many commenters requested that alternatives to the scope and type of development be considered in the EIS. As noted below, the EIS has appropriately considered a reduced intensity alternative and an alternate use alternative. Other commenters requested that alternative sites be considered. Some of these commenters specifically suggested alternative sites, including Skaggs Island, the Agilent campus, the Tribe's Lakeville Highway property, the former Hamilton Air Force Base, Mare Island, the Mecham Road Landfill, and the former Sonomarin Drive In. Although NEPA does not require that every conceivable alternative be included within an EIS, the Tribe conducted an extensive search for a proposed site and the NIGC has also considered many alternative sites for analysis in the EIS. The EIS includes a full analysis of three alternative sites, including the Lakeville Highway property (the Lakeville site). Other sites suggested by commenters were considered but eliminated from further consideration for reasons detailed in **Section 2.9.2**.

During preparation of this EIS, numerous environmental constraints to the development at the Stony Point Site were identified, including wetlands and flooding. Therefore, the Tribe and its backers, at considerable expense, again purchased a new potential site the third site, representing the second time the preferred site was moved for environmental reasons. The casino-hotel resort is now proposed on an approximately 252-acre site, which includes the southern 182 acres of the Stony Point Site and a new 70-acre portion of land to the northeast. This site is described in

Section 1.3.1 of this EIS and is referred to as the Wilfred Site. A supplemental NOI was published in the *Federal Register* on September 29, 2005 (**Appendix A**). The NOI briefly described the newly proposed location for the proposed casino-hotel development.

The recommended intersection improvements identified in the traffic studies (**Appendix O**) and **Section 5.2.7** to reduce or eliminate potentially significant traffic impacts (including the impacts of those improvements on wetlands) for each of the alternatives are discussed in the Indirect Effects section of the EIS (**Section 4.11.2**) and are incorporated by reference here so as not to duplicate discussion. Of course these improvements, to which the Tribe is to contribute its proportionate or full share, are not within the Tribe's ability to build since the roadways are owned by the State, the County, or the City, but the NIGC does intend to require the Tribe to pay its proportionate or full share as appropriate to the jurisdiction owning the roadway and undertaking the improvement. Of course, those entities will have to apply to the Army Corps of Engineers for authorization to undertake any activity prior to impacting wetlands or waters of the U.S.

2.2 ALTERNATIVE A – PROPOSED PROJECT

Alternative A consists of the NIGC's approval of a gaming management contract between the Tribe and SC Sonoma Management, LLC. The foreseeable consequence of this action would be the development of a casino-hotel resort on a portion of approximately 252-acres of land (Wilfred Site) that would be taken into trust for the Tribe. The Wilfred Site is described in more detail in **Section 1.3.1**.

The development of a casino-hotel resort is planned on approximately 66-acres in the northeast corner of the Wilfred Site. The remainder of the Wilfred Site would remain undeveloped and be used for open space, pasture, biological habitat, and recycled water sprayfields (uses consistent with the Williamson Act restrictions currently present on the southern portion of the Wilfred Site). The casino-hotel resort was designed by the Tribe and its management partner to be profitable within a competitive gaming market in order to pay for the various costs of development and still provide a sustained revenue stream for the Tribe. It would include restaurants, a hotel, an entertainment venue, banquet/meeting space, a pool, and spa. **Table 2-1** shows the breakdown of proposed uses with associated square footages for the proposed casino-hotel resort. **Figure 2-1** shows the site plan for Alternative A, including supporting facilities. An architectural rendering of the conceptual building elevation is presented in **Figure 2-2**. The casino-hotel resort would employ approximately 2,400 employees. Access to the casino-hotel resort would be gained from access points on Business Park Drive and Wilfred Avenue.

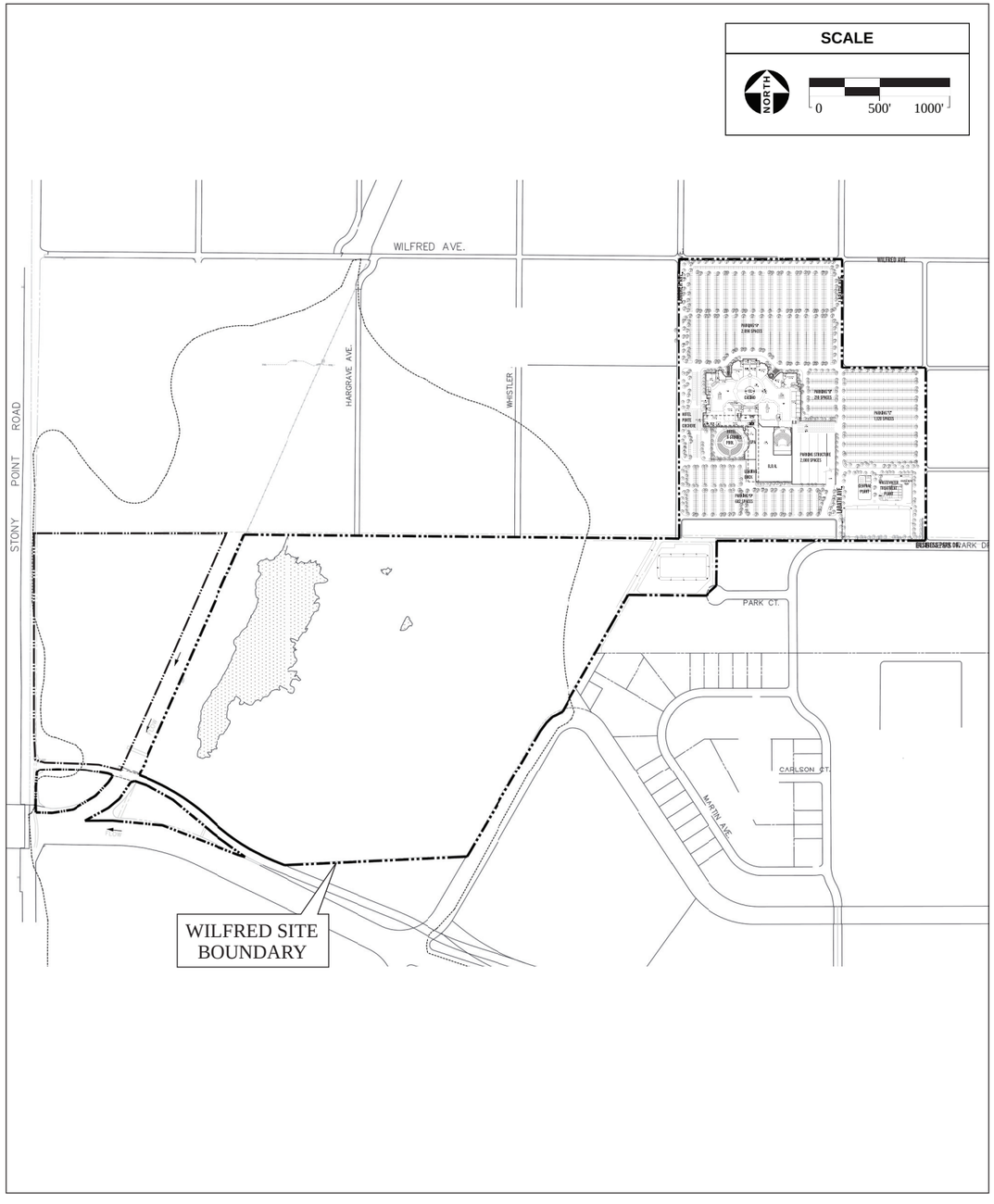
The Tribe would enter into a Tribal-State Compact, as required by the Indian Gaming Regulatory Act (IGRA) to govern the conduct of Class III gaming activities, or comply

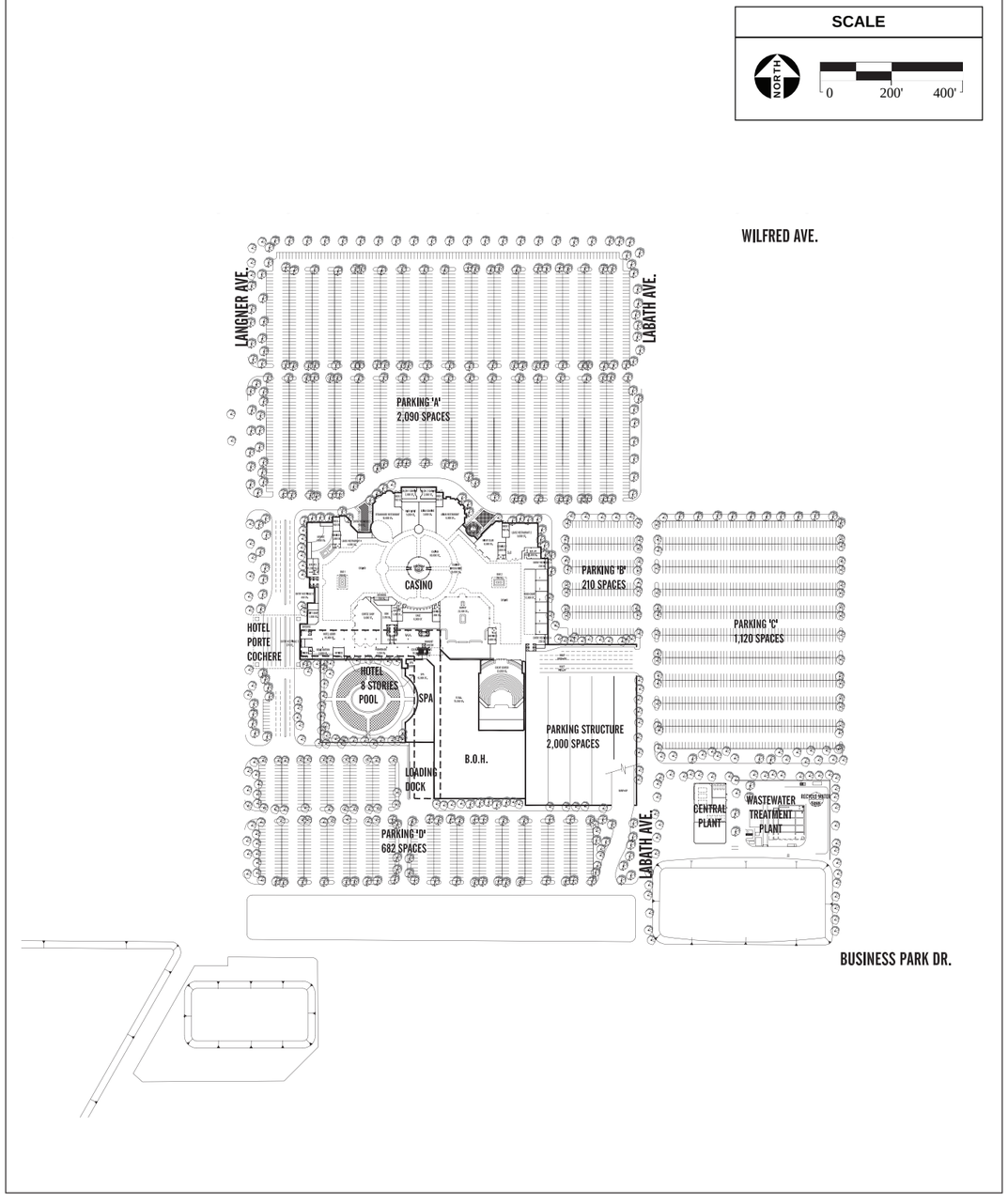
TABLE 2-1
ALTERNATIVE A – PROPOSED PROJECT COMPONENTS

Area	Seats/Rooms/Parking Spaces	Approximate Square Footage
CASINO & ENTERTAINMENT		
Casino		
Casino Gaming		80,000
Casino Circulation		26,000
High Limit Gaming		5,000
Asian Gaming		3,600
Salons (2 total)		4,000
Entry Vestibules (5 total)		2,500
Restrooms (5 total)		6,000
Rewards Center		750
Cage		6,000
Back of House		70,000
Gift Shop		1,000
Food and Beverage		
Buffet	500 seats	23,500
Bars (3 total)		4,500
Service Bars (4 total)		4,000
Lease Restaurants (3 total)	480 seats	20,000
Coffee Shop	225 seats	8,800
Steakhouse	200 seats	10,000
Food Court (6 tenants)	210 seats	12,600
Entertainment		
Nightclub		6,500
Show Room	1,500 seats	35,400
Lounge		8,000
Banquet		
Banquet Meeting Space		30,000
Pre-Function/Kitchen/Storage/Office/Support		40,000
Total Casino & Related Square Footage		*408,150*
HOTEL & SPA		
Hotel		
Lodging Area	300 rooms (20% suites)	291,000
Lobby/Bar/Back of House		13,750
Sundries		1,000
Pool & Spa		
Spa		20,000
Pool Restrooms		2,600
Pool Concessions		1,500
Pool Grill		3,000
Total Hotel & Spa Square Footage		*332,850*
CENTRAL PLANT		*21,300*
Alternative A Total Square Footage		**762,300**
PARKING		
Surface Parking	4,102 parking spaces	
Parking Structure	2,000 parking spaces	
Alternative A Total Parking Spaces	**6,102 parking spaces**	

SOURCE: Friedmutter Group, 2006; AES, 2006.

with procedures established by the Secretary of the Interior (pursuant to IGRA and 25 C.F.R. 291) in the event that the State and the Tribe are unable to agree to a compact. The operation of a Class II gaming facility (such as a card room) does not require a compact or Secretarial procedures.

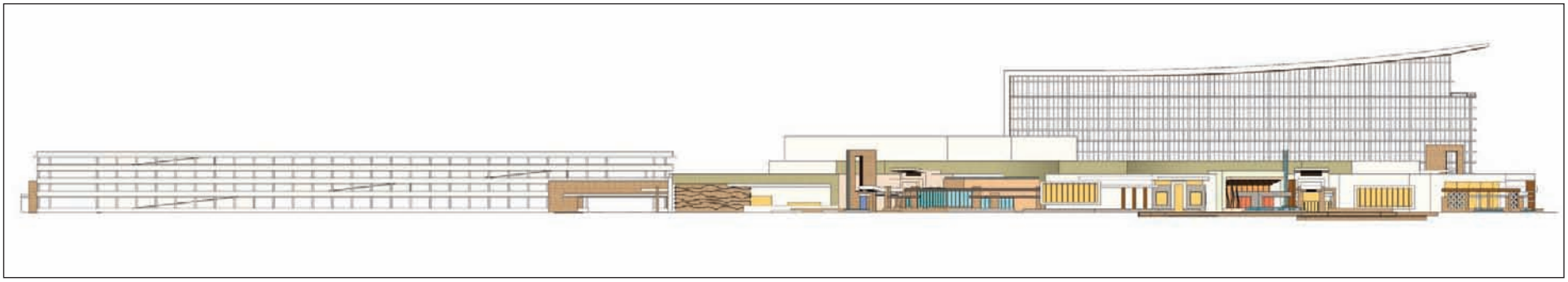




SOURCE: Friedmutter Group, 7/22/2004; AES, 2005

Figure 2-1
Alternative A – Site Plan

View From North



North Elevation

SOURCE: Friedmutter, 2008; AES, 2008

Figure 2-2
Alternative A and B – Architectural Rendition

The Tribe has proposed a Class III facility in order to effectively compete within the local gaming market, and in order to generate enough revenues to cover the costs of development and fund the Tribal government. The compact (or Secretarial procedures) is expected to at a minimum include the following provisions:

The facility will be issued a certificate of occupancy by the Tribal Gaming Agency prior to occupancy.

- The Tribal Government will adopt and comply with standards no less stringent than State public health standards for food and beverage handling.
- The Tribal Government will adopt and comply with standards no less stringent than federal air quality, water quality, and safe drinking water standards applicable in California.
- The Tribal Government will adopt and comply with standards no less stringent than federal workplace and occupational health and safety standards.
- The Tribal Government will comply with Tribal codes and other applicable federal law regarding public health and safety.
- The Tribal Government will make reasonable provisions for adequate emergency, fire, medical, and related relief and disaster services for patrons and employees of the facility.

2.2.1 MANAGEMENT CONTRACT

Congress enacted IGRA with the stated purpose of providing a statutory basis for the operation and regulation of gaming by tribal governments. As part of its regulatory function, the NIGC, which was established under IGRA, is charged with the authority to approve gaming management contracts between tribal governments and outside management groups. As part of its review of the management contract, the NIGC will evaluate the overall effects of the project on human health and the environment, along with the scope and terms of the management 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 compensation, 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 provide for the safety of the operations and integrity of the games. As part of this regulatory function, the NIGC has promulgated minimum control requirements for the operation of a tribal gaming facility. In addition, 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 (25 C.F.R. Section 573.6(a)(12))."

In April 2003, the Tribe and SC Sonoma Development or its affiliates entered into a development contract for the construction and development of the proposed project. Under the terms of the development contract, SC Sonoma Development has assisted the Tribe in obtaining funding for the purchase of land to be taken into trust. SC Sonoma Development would also assist in the construction of the proposed project under the terms of the development contract.

Once the casino-hotel resort becomes operational, a gaming management contract would provide SC Sonoma Management with the exclusive right to manage the day-to-day operations of the casino for no more than seven years, during which time SC Sonoma Management would retain a portion of the net total revenues of the casino (22 percent). SC Sonoma Management must comply with the terms of IGRA and NIGC regulatory requirements relating to the operation of a 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, all tribal gaming ordinances, and the Tribal-State Compact (or Secretarial procedures).

In addition to the gaming management contract, a resort management contract would govern the management of the non-gaming components of the casino-hotel resort, including the spa, hotel, and restaurants by SC Sonoma Resort Management, LLC. Note that NIGC approval is not required for the development contract or the resort management contract. Any references to a management contract generally or to NIGC approval of a management contract in this EIS refer to a gaming management contract.

2.2.2 CASINO AND RELATED AMENITIES

The two-story casino would consist of a mixture of uses, including, banking and administrative facilities, gaming commission offices, a primary gaming area, a high-limit gaming area, and a small gift shop. Numerous food and beverage outlets would be included in the facility, including, three bars, four service bars, a buffet, a six-vender food court, and five restaurants. The facility would also contain an entertainment venue and banquet/meeting space. A detailed listing of each component of the facility is contained in **Table 2-1**.

Alcohol would be served throughout the casino, including the gaming floor. Accordingly, casino patrons would be required to be at least 21 years old, and the Tribe would adopt a "Responsible Alcoholic Beverage Policy" that would include, but not be limited to, verifying the age of patrons and refusing service to those who are visibly intoxicated. Smoking would be permitted within the casino; however, non-smoking sections would be provided.

2.2.3 HOTEL AND SPA

The 300-room, 8-story hotel would be located adjacent to the pool and spa area. A detailed listing of each hotel and spa component is provided in **Table 2-1**.

2.2.4 PARKING

A total of approximately 6,100 parking spaces would be provided to serve the patrons and employees of the resort and supporting facilities. A parking structure, providing a total of 2,000 parking spaces, would be connected to the southeast corner of the casino.

2.2.5 CONSTRUCTION

Alternative A would be constructed after the Wilfred Site has been placed into federal trust. Construction duration is estimated at 27 months. Among other activities, construction would involve demolition (of 2 unoccupied dwellings); earthwork; placement of concrete foundations; steel, wood and concrete structural framing; masonry; electrical and mechanical work; building and site finishing; and paving. A preliminary grading plan can be found in **Appendix C**.

As described below in **Section 2.2.10**, the Tribe has entered into a Memorandum of Understanding (MOU) with the City of Rohnert Park. In the MOU, the Tribe agreed to construct the gaming facility and all supporting buildings in accordance with standards no less stringent than those set forth in the Uniform Building Code, including all Uniform Fire, Plumbing, Electrical, Mechanical, and related Building Codes, as adopted, amended, and incorporated into the Rohnert Park Municipal Code (MOU, 2003). Construction of the facility would also comply with the best management practices (BMPs) listed in Appendix D of the Site Grading and Storm Drainage Report (reproduced in **Appendix C**), including BMPs for paving operations, structure construction, painting, material delivery/storage, material use, spill prevention/control, solid waste management, hazardous waste management, concrete waste management, sanitary/septic waste management, vehicle/equipment cleaning, vehicle/equipment fueling, and vehicle/equipment maintenance. In addition, construction activities would comply with all applicable federal standards, including Occupational Safety and Health Administration (OSHA) requirements and the federal Americans with Disabilities Act (P.L. 101-336, as amended, 42 U.S.C. Section 12101 *et seq.*).

2.2.6 DRAINAGE

Included in **Appendix C**, the preliminary grading and drainage plan for Alternative A incorporates fill to elevate the proposed gaming facility sufficiently to allow stormwater to gravity flow and empty into a detention basin. Note that the development area for the casino/hotel/parking facilities is outside of the 100-year floodplain. All of the proposed facilities would be constructed at least one foot above the 100-year floodplain elevation. Specifically, the buildings would be

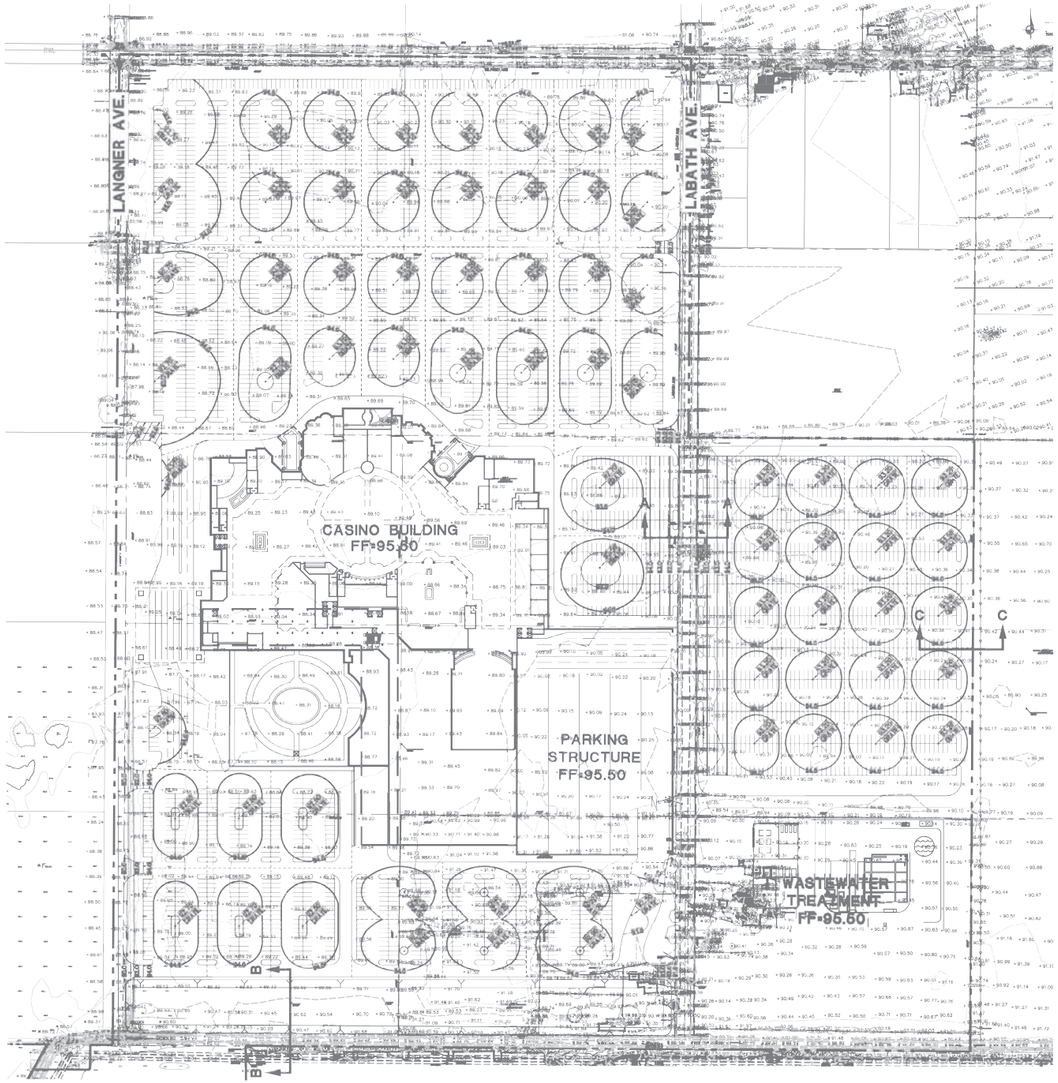
approximately five feet above the floodplain and the parking lot would be approximately one foot above the floodplain. It is estimated that 300,000 cubic yards of earthwork will be required for Alternative A. On-site excavation adjacent to the development area would yield approximately 25,000 cubic yards of fill material. On-site excavation from the southern portion of the site would yield the remaining fill material, resulting in a "balanced" site (**Appendix C**).

Runoff from the Wilfred Site would be conveyed by an underground drainage system to the detention basin, and, after filtration, to Labath Creek located adjacent to the proposed detention basin (**Figure 2-3**). Labath Creek feeds into Hinebaugh Creek and then into the Laguna de Santa Rosa. The drainage plan includes the use of several features designed to filter the surface runoff prior to release into the natural drainage channels on-site. Runoff from the Wilfred Site primarily will be directed into storm drainpipes, with sheet flow to vegetated swales present along the perimeter of developed areas. Overflow drainage releases will be developed on-site, along the western and eastern edges of the developed area.

Inlets would be placed at appropriate intervals along drainpipes to capture runoff and convey it to the detention basin. Prior to release into the storm drainpipes, runoff would pass through a sediment/grease trap ("Stormceptor") that would filter out suspended solids such as trash and soil sedimentation, oil, grease, and other potential materials that could degrade surface water quality. Vegetated swales would also provide filtering of runoff prior to release into the site drainage channels, by capturing sediment and pollutants.

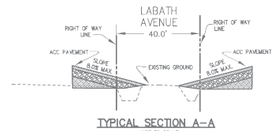
The grading and drainage plan incorporates two areas for storm water detention to reduce increased peak flows resulting from increased impervious surfaces to pre-project levels and to offset reduced floodplain storage caused by the development of project facilities. The first stormwater detention basin would assure that post-development runoff peaks from the Wilfred site would be equal to the existing conditions. Moreover, the basin would attenuate the increase in peak flow that would be generated by obtaining a permit to release 300,000 gallons per day of tertiary treated effluent from a proposed on-site wastewater treatment plant. The detention of water on-site would reduce potential downstream erosion and effects to water quality. Approximately 14 acre-feet of storage would be provided in the stormwater detention basin to account for the increase in runoff created by increased impervious surfaces. The detention system would be located on the southern edge of the proposed casino-hotel development area (**Figure 2-4**).

A second storm water detention / flood storage area is proposed to be created in the southern portion of the Wilfred site (see **Figure 2-11**). This detention area will allow for additional storage area to account for the fill placed in the non-regulated Zone X. The depth of the Zone X is considered to be an average of one foot of fill over approximately 73-acres for 73-acre-feet for Alternative A.

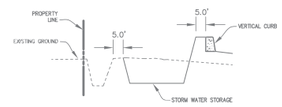


LEGEND

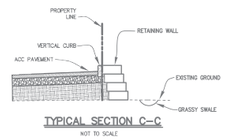
- PROPOSED MAJOR CONTOUR — 252.0
- PROPOSED MINOR CONTOUR — 251.0
- CATCH BASIN
- GRATE ELEVATION — 250.00 GRATE
- RIDGE LINE
- EXISTING SPOT ELEVATION — 91.19



TYPICAL SECTION A–A
NOT TO SCALE



TYPICAL SECTION B–B
NOT TO SCALE



TYPICAL SECTION C–C
NOT TO SCALE

SCALE

NORTH

0 150' 300'

SOURCE: Robert A. Karn & Associates, 2004; AES, 2007

Figure 2-3
Alternative A – Grading/Drainage Plan

SOURCE: Aerial Photography August 2002; Huffman Broadway Group, Inc. , 2004; Robert A. Karn & Associates, Inc.; AES, 2007

Figure 2-4

Alternative A and H – Grading Drainage Plan – Stormwater Detention Basin

2.2.7 WASTEWATER TREATMENT AND DISPOSAL

WATER QUALITY AND CAPACITY

As detailed in the Water/Wastewater Feasibility Study (**Appendix D**), typical gaming facilities have higher biochemical oxygen demand (BOD) and total suspended solids (TSS) values compared to domestic wastewater. Shock loads are also typical of gaming facility wastewater. Weekend flows are much higher than weekday flows, and evening flows are higher than daytime flows. Based on the wastewater generation rates identified in **Appendix D**, Alternative A would require the capability to treat and/or convey the project's maximum weekend demand of approximately 354,000 gallons per day (gpd). One off-site and two on-site options have been identified for treating the wastewater flow that would be generated by Alternative A. Wastewater treatment and disposal options for Alternative A through Alternative H are outlined in **Table 2-2**. Note that off-site wastewater treatment options were ruled out for Stony Point Site alternatives after initial discussions with the City of Rohnert Park. An off-site option was included for Alternative A because a City sewer main crosses the Wilfred Site, and the proposed development would be displacing already planned City development on the Wilfred Site, which is planned for connection to the regional treatment plant.

OPTION 1

The Wilfred Site is located within the Laguna Subregional Treatment Plant (Laguna WWTP) service area, which provides wastewater treatment to the Cities of Rohnert Park, Cotati, Santa Rosa, and Sebastopol, as well as the unincorporated South Park County Sanitation District and wastewater from industrial discharges. Option 1 involves connecting to the local sewer system and pumping to the Laguna WWTP for treatment and disposal. Effluent is disposed of to holding ponds for reuse for agricultural and urban irrigation, for creation of wetlands and for the Geysers Recharge Project. The Geysers Recharge Project is a geothermal operation in which recycled water is injected into the earth creating steam, which is channeled to create electricity. From October to May, a portion of the effluent is discharged into the Laguna de Santa Rosa, which flows to the Russian River. Discharge is permitted for up to 5 percent of the Russian River's flow. The operation of the Geysers Recharge Project began in 2003 and has significantly reduced the amount of effluent discharged to the Laguna de Santa Rosa (City of Santa Rosa, 2006).

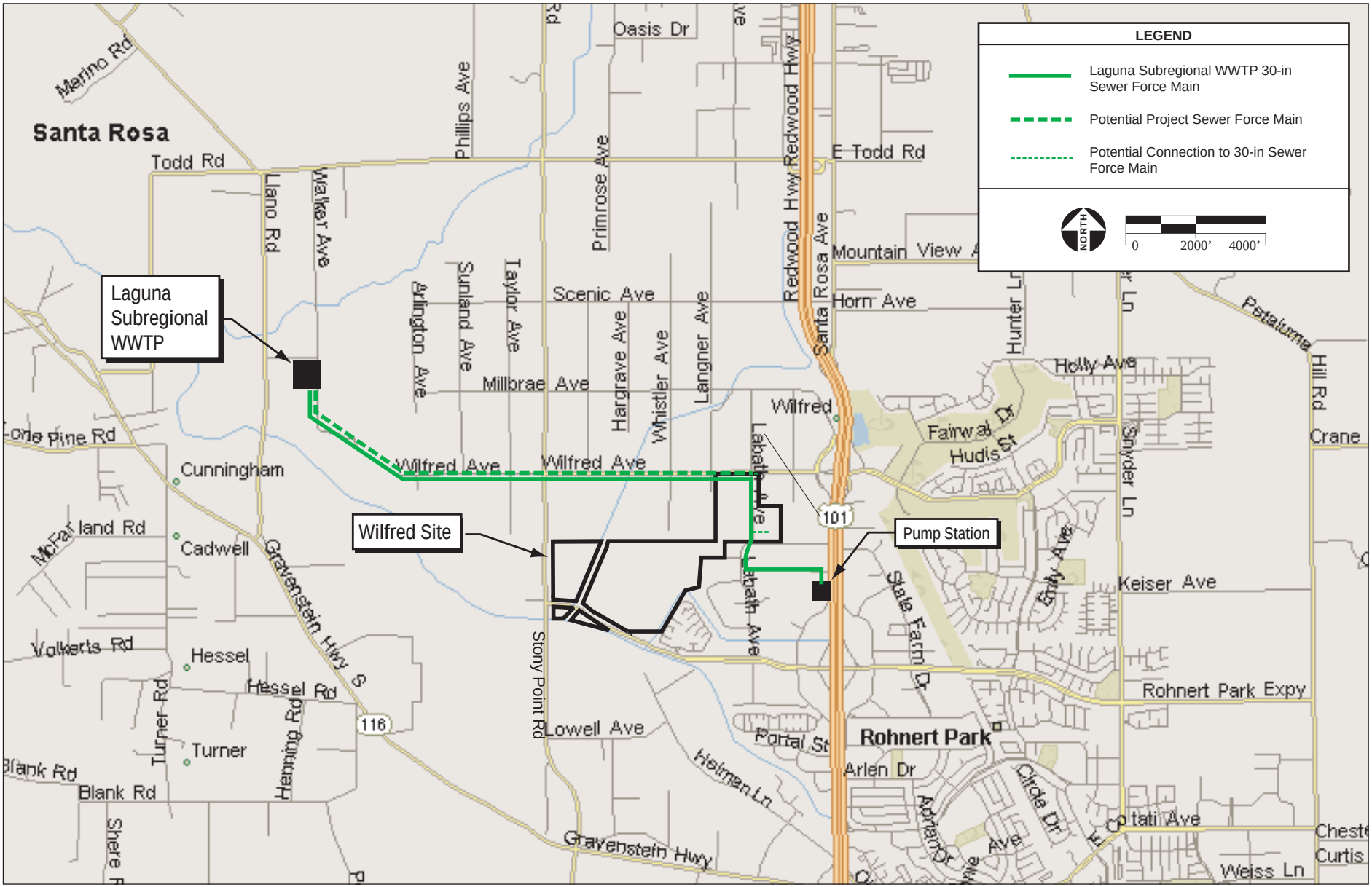
Conveyance from the Wilfred Site to the Laguna WWTP, which is located approximately two miles away, could occur via one of three methods depicted in **Figure 2-5**. These methods for connecting to the sewer system include:

- Connecting to the City of Rohnert Park gravity sewer system. The Rohnert Park Effluent Pump Station would pump sanitary sewage from the Wilfred Site through a new 30-inch diameter force main or an existing 24-inch diameter force main to the Laguna WWTP.

TABLE 2-2
WASTEWATER TREATMENT OPTIONS

Proposed Alternative	Wastewater Treatment/ Disposal Option (ranked in expressed order of Tribal preference)	Description
Alternative A	*Option 1:*	Connect to the City of Rohnert Park sewer system. Treat and dispose of wastewater at the Laguna Wastewater Treatment Plant (WWTP), located two miles west of Wilfred Site **(Figure 2-5)**. Effluent disposed to holding ponds for reuse for agricultural and urban irrigation, creation of wetlands and the Geysers Recharge Project for creating electricity. From October to May, a portion of the effluent is discharged into the Laguna de Santa Rosa.
	Option 2:	Construction of an on-site WWTP throughout the northeast area of the Wilfred Site, southeast of the Casino. Effluent disposed of through sprayfields in the southern half of the site from April to October, and in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel during the remainder of the year **(Figure 2-6)**.
	Option 3:	Construction of an on-site wastewater treatment plant in the northeast area of the Wilfred Site, southeast of the Casino. Effluent disposed of through sprayfields of increased acreage in the southern half of the Wilfred Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year **(Figure 2-7)**.
Alternative B	*Option 1:*	Construction of an on-site wastewater treatment plant in the western area of the Stony Point Site, southeast of the Casino. Effluent disposed of through sprayfields in the northeast quadrant of the Stony Point Site from April to October, and in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel **(Figure 2-12)**.
	Option 2:	Construction of an on-site wastewater treatment plant in the western area of the Stony Point Site, southeast of the Casino. Effluent disposed of through sprayfields of increased acreage in the northeast and southeast quadrants of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year **(Figure 2-13)**.
Alternative C	*Option 1:*	Construction of an on-site wastewater treatment plant in the central area of Stony Point Site, southwest of Casino. Effluent disposed of through sprayfields in the northwest quadrant of the Stony Point Site from April to October, and in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel **(Figure 2-17)**.
	Option 2:	Construction of an on-site wastewater treatment plant in the central area of Stony Point Site, southwest of Casino. Effluent disposed of through sprayfields of increased acreage in the northwest, northeast, and southeast quadrants of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year **(Figure 2-18)**.
Alternative D	*Option 1:*	Construction of a reduced intensity on-site wastewater treatment plant in the northwest area of the Stony Point Site, southeast of the Casino. Effluent will be disposed of through sprayfields in the northeast quadrant of the Stony Point Site from April to October, and in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel **(Figure 2-21)**.
	Option 2:	Construction of a reduced intensity on-site wastewater treatment plant in the northwest area of the Stony Point Site, southeast of the Casino. Effluent disposed of through sprayfields of increased acreage in the northeast and southeast quadrants of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year **(Figure 2-22)**.
Alternative E	*Option 1:*	Construction of an on-site wastewater treatment plant in the northwest area of the Stony Point Site, southeast of the Business Park. Effluent disposed of through sprayfields in the northeast quadrant of the Stony Point Site from April to October, and in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel **(Figure 2-26)**.
	Option 2:	Construction of an on-site wastewater treatment plant in the northwest area of the Stony Point Site, southeast of the Business Park. Effluent disposed of through sprayfields of increased acreage in the northeast quadrant of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year **(Figure 2-27)**.
Alternative F	*Option 1:*	Construction of an on-site wastewater treatment plant in the western area of Lakeville Site/West of Casino. All effluent will be disposed of through sprayfields in the southern half of the Lakeville Site from April to October, but water produced during the wet season will be disposed of in an on-site stream tributary to the Petaluma River **(Figure 2-30)**.
	Option 2:	Construction of an on-site wastewater treatment plant in the western area of Lakeville Site/West of Casino. All effluent will be disposed of through sprayfields of increased acreage in the southern and western halves of the Lakeville Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year **(Figure 2-31**).
Alternative G	NA	Connect to the City of Rohnert Park sewer system. Treat and dispose of wastewater at the Laguna Wastewater Treatment Plant (WWTP), located two miles west of Wilfred Site.
Alternative H		Wastewater treatment options under this alternative would be the same as for Alternative D with the additional option for treatment and the Laguna WWTP as described under Alternative A. Effluent disposal would be the same as proposed for Alternative A, while the required volume for seasonal storage ponds and required area for spray fields would be the same as Alternative D.

SOURCE: HYDROSCIENCE, 2008; AES, 2007.



SOURCE: HydroScience Engineers, Inc. 2005; Microsoft Streets & Trips, 2004; AES, 2005

Figure 2-5
Alternative A - Water/Wastewater Facilities (Option 1)

- Pump sewage directly into the City's sewer force main, bypassing the gravity collection system and existing effluent pump station. Sewage would be conveyed to the Laguna WWTP as described above. Although technically possible, the City has indicated that this would not be permitted.
- Construction of an on-site pump station and a parallel force main from the Wilfred Site to the Laguna WWTP.

OPTION 2

In the event that each off-site sewage treatment option proves infeasible, a wastewater treatment facility would be constructed on the Wilfred Site. The wastewater treatment facility planned for the proposed project would be designed to satisfy several criteria that would comply with standards established by the USEPA. These criteria include:

- The technology must be one that is proven, has been accepted by USEPA and is certified by the National Sanitation Foundation.
- The treatment process will be a tertiary treatment process that has the capability of treating wastewater to a quality level that meets California Title 22 standards for unrestricted irrigation water reclamation.
- The process will have the capability of nitrifying and de-nitrifying converted nitrogen compounds.
- The combined treatment system will have the capability of accommodating waste strength loads and hydraulic peaking factors that exceed normal domestic wastewater treatment systems.
- The operation will not produce noxious odors.

To meet the above criteria, the Tribe would use an immersed membrane bioreactor (MBR) system to provide the highest quality water for reuse or disposal. The MBR is a state-of-the-art system that operates as an activated sludge process run at a high-suspended solids concentration. Running at a high suspended solids concentration gives the system the ability to react to wide variations in flows as would be expected at gaming facilities on the weekend or holidays. Experience at the other operating plants demonstrates the ability of the MBR system to consistently produce a high-quality effluent.

The planning of a 400,000 gal/d WWTP matches the projected wastewater generation rates with the capacity of the wastewater treatment plant, and includes a factor of safety to accommodate variations in diurnal flows. A concrete equalization tank or basin will be included in the treatment

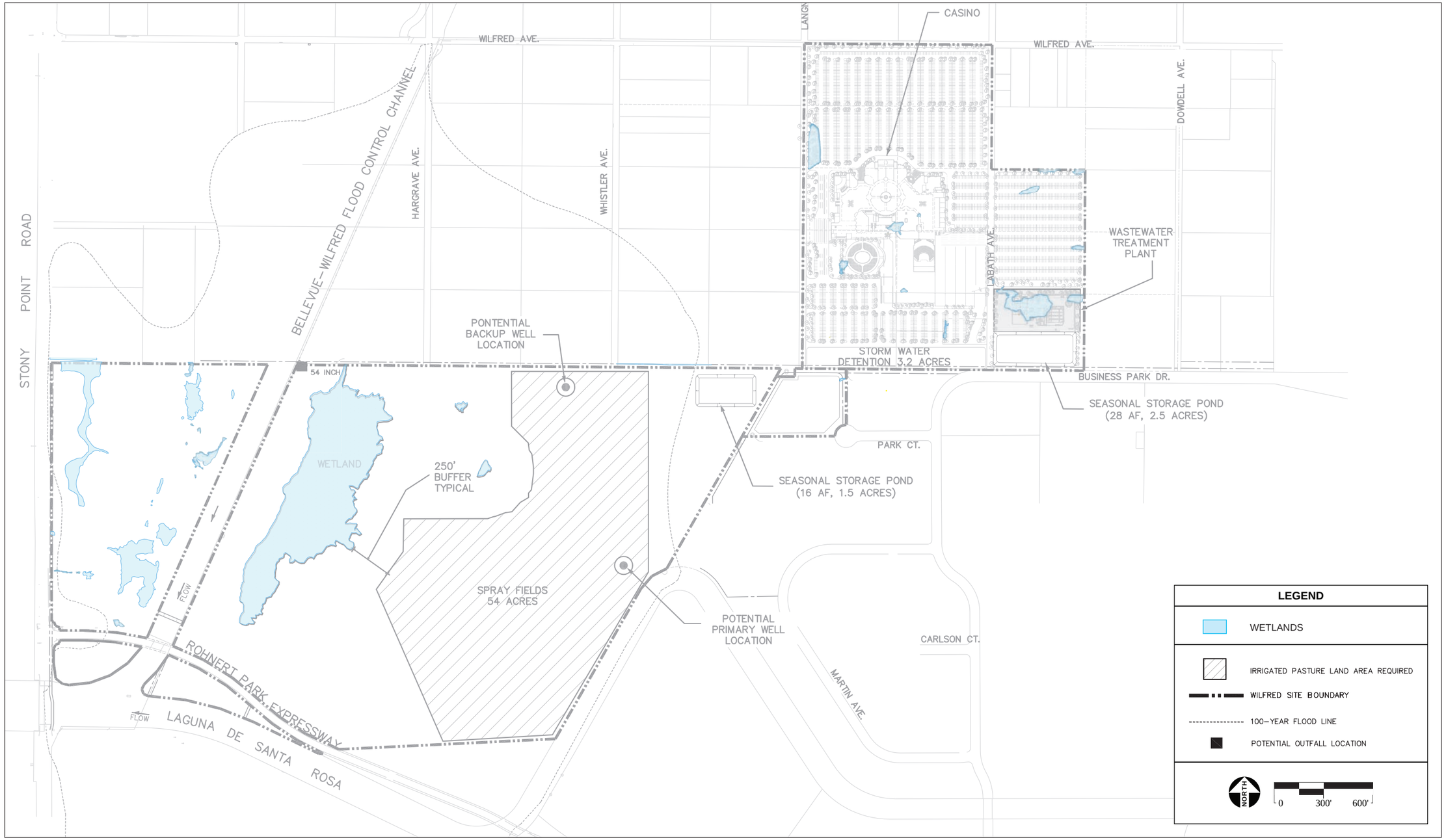
plant design. The required volume of equalization is expected to be around 80,000 gallons, with a 15percent factor of safety. Details on the volume of equalization and calculations can be found in **Appendix D**.

The location of the wastewater treatment facility is presented in **Figure 2-6**. A detailed description of the wastewater treatment facility is presented in **Appendix D**. As discussed in **Appendix D**, the elements of the wastewater treatment and disposal facility include a wastewater treatment plant, wastewater piping, landscape irrigation, surface disposal, and a recycled water reservoir. As presented in **Figure 2-6**, the Option 2 assumes all effluent will be disposed of through sprayfields in the southern half of the Wilfred Site from April to October, but water produced during the wet season will be disposed of in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel. Treated wastewater will flow within existing drainage channels and through an existing 54-inch culvert on the east side of the Bellevue-Wilfred Channel.

A detailed description of the operations and maintenance program will be prepared following completion of the wastewater treatment plant design. However, it is expected that the wastewater treatment plant would be operated and maintained similarly to the standards of other tertiary treatment plants in California. To this effect, this wastewater plant will be staffed with operators who are qualified to operate the plant safely, effectively, and in compliance with all permit requirements and regulations. It is expected that the operators will have qualifications similar to those required by the State Water Resources Control Board Operator Certification Program. This program specifies that for tertiary level WWTPs with design capacities of 1.0 million gallons per day (MGD) or less, the chief plant operator must be at least a Grade III operator. The program specifies that supervisors and shift supervisors must be at least a Grade II.

The proposed treatment and disposal facility would provide for the use of reclaimed water for casino toilet flushing and landscape irrigation. All water used for reclamation would meet State standards governing the use of recycled water as described in Title 22 of the California Code of Regulations. Title 22 specifies redundancy and reliability features that must be incorporated into the reclamation plant. Under the current version of the Title 22 Water Recycling Criteria, the highest level of treatment is referred to as “disinfected tertiary recycled water.” The proposed plant would produce an effluent meeting the criteria for this highest level of recycled water. Disinfected tertiary recycled water can be used for irrigation of parks, playgrounds, schoolyards, residential landscaping, golf courses, and food crops. Additional permitted uses include non- restricted recreational impoundments, cooling towers, fire fighting, toilet flushing, and decorative fountains. The water produced by this treatment system would be highly treated and would pose no health risks for the intended uses.

The proposed reclaimed water system would include a 500,000-gallon recycled water, seasonal storage tank. This tank would not be used for the storage of untreated or raw wastewater.



SOURCE: HydroScience Engineers, 11/8/2007; AES, 2008

Figure 2-6
Alternative A – Water / Wastewater Facilities (Option 2)

Recycled water would be produced by the wastewater treatment plant at the rate that wastewater is received at the plant. The primary transmission line from the recycled water storage tank would supply the facility and landscaping with recycled water.

Surplus recycled water would be used for landscape irrigation or sent to disposal areas. In the summer, the Tribe would maximize conventional landscape use of recycled water. Since the wastewater would be treated to meet Title 22 quality standards for disinfected, tertiary recycled water prior to storage, the water would meet the requirements for surface or spray irrigation use. Irrigation of the sprayfield would occur at agronomic rates at all times, so irrigation would not occur during periods of flooding.

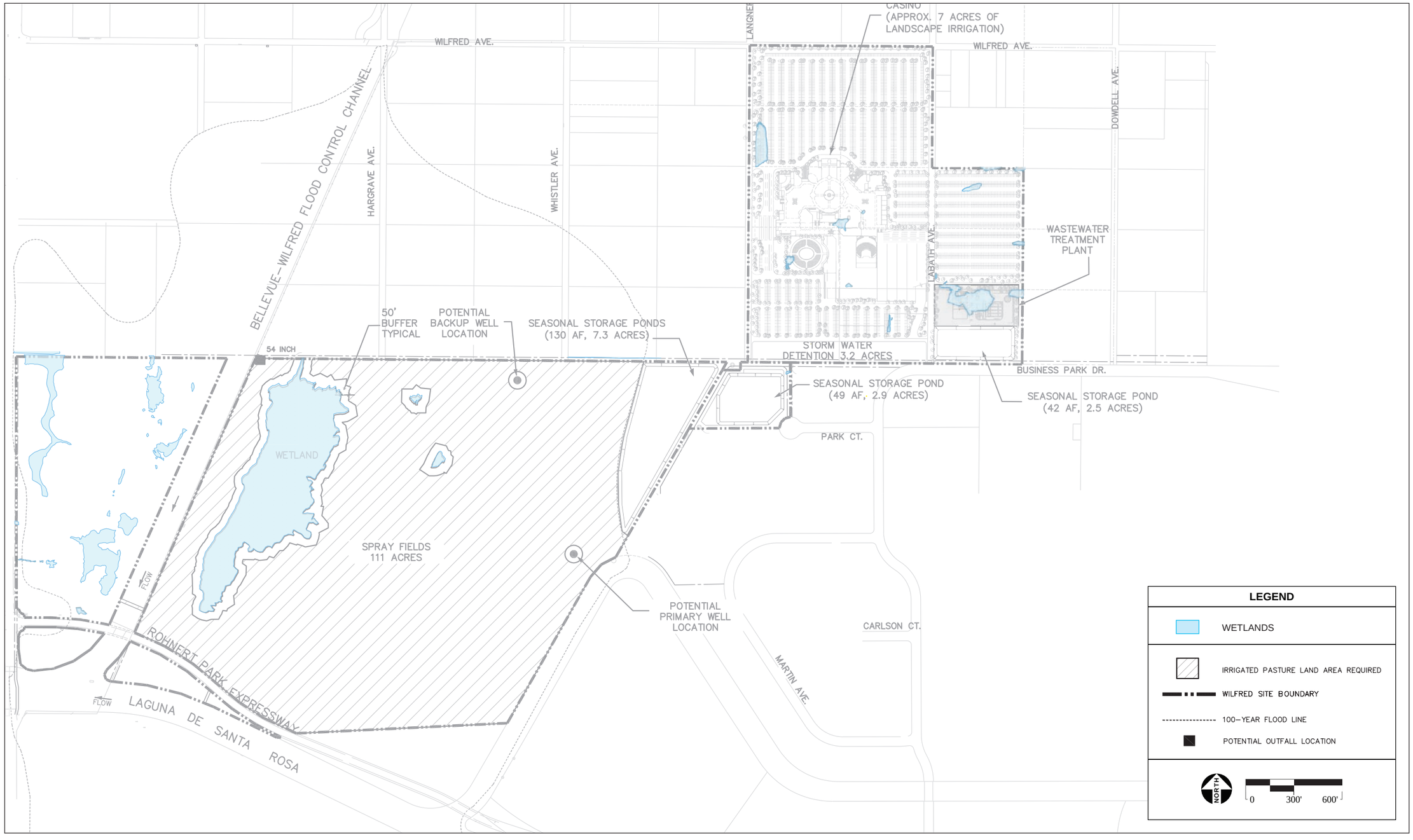
In order to use recycled water for in-building purposes, the plumbing system within the facility would have recycled water lines plumbed separately from the building's potable water system with no cross connections. The dual plumbing systems would be marked distinctly and color-coded.

OPTION 3

As with Option 2 above, a wastewater treatment facility would be constructed on the Wilfred Site. As presented in **Figure 2-7**, Option 3 assumes all effluent will be disposed of through sprayfields of increased acreage in the southern half of the Wilfred Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year. The wastewater treatment facility planned for the proposed project would be designed to satisfy criteria that would comply with the standards established by the USEPA; similar to those outlined above in Option 2. As with Option 2, irrigation of the sprayfield would occur at agronomic rates at all times, so irrigation of sprayfields would not occur during periods of flooding.

2.2.8 WATER SUPPLY

Water for domestic use, emergency supply, and fire protection would be provided by on-site wells. An off-site connection to the City of Rohnert Park water system was considered; however, the City has stated that such a hook up would not be possible primarily due to uncertainty over SB 610 requirements (**Appendix D**). SB 610 requires additional information for Urban Water Management Plans (UWMP) to determine the availability of groundwater. This legislation now requires a copy of any groundwater management plan adopted by the supplier, a copy of the adjudication order for basins, and if non-adjudicated, whether the basin has been identified as being overdrafted or projected to be in overdraft by the most current Department of Water Resources (DWR) publication on that basin (DWR, 2007).



SOURCE: HydroScience Engineers, 11/8/2007; AES, 2008

Figure 2-7
Alternative A – Water / Wastewater Facilities (Option 3)

Elements of the proposed on-site water facilities include two on-site wells (one for continuous supply and one for redundancy in case of malfunction or maintenance of the primary well), an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system.

The proposed utilization of recycled water would significantly reduce water demands for the proposed project. According to the Water and Wastewater Feasibility Study (**Appendix D**), the estimated average water demand is 165 gallons per minute (gpm). Peak water demand (typically occurring on weekends) is estimated at 226 gpm. Water supply projections are based on average wastewater flows and include a 15 percent allowance for system losses and a 20 percent reduction based on utilization of recycled water. The minimum water supply requirement for a project well is 200 gpm, nonetheless HydroScience Engineers, Inc. recommends sizing wells to 250 gpm for an added degree of safety to account for unusually high peak demands. Two wells (for redundancy) with a firm water supply capacity of 250 gpm each would be constructed on the Wilfred Site. The wells are expected to alternate in use based on water supply requirements in order to equalize run times for equipment located on each well and to maintain viability of each well. The approximate depth of the wells would be 650 feet and screening would occur between 200 and 650 feet below the surface. The existing on-site wells would be abandoned. Water tank capacity would be based on fire flow requirements developed after review by local fire authorities. The estimated capacity would be approximately 1.2 million gallons and in a welded steel tank designed to meet American Water Works Association (AWWA) specifications (**Appendix D**). A potable water pump station with two water pumps would convey water from the storage tank to facilities requiring potable water. The potable water main for the Wilfred Site would be sized for the peak daily demand.

If an on-site wastewater treatment plant is constructed, the water system would be dual plumbed for use of recycled water for such uses as landscape irrigation, toilet flushing, and cooling towers. If wastewater service is obtained from the Laguna WWTP, recycled water would be obtained from a connection to the City of Santa Rosa Subregional System. Recycled water from the Subregional System would be used for irrigation only. Recycled water pipelines are located adjacent to the site. Diurnal storage and pumping facilities may be required if recycled water from the Subregional system is used.

Water conservation measures would include use of recycled water as described above. The following additional conservation measures are proposed to further reduce water usage (HSE, 2006b):

- Checking steam traps and ensuring return of steam condensate to boiler for reuse.
- Limiting boiler blowdown and adjusting for optimal water usage.
- Using low flow faucets and/or aerators in casino and hotel.

- Using low flow showerheads in hotel.
- Encouraging voluntary towel re-use by hotel guests.
- Using pressure washers and water brooms instead of hoses for cleaning.
- Using garbage disposal on-demand in restaurant.
- Incorporating a re-circulating cooling loop for water cooled refrigeration and ice machines in restaurants.
- Serving water to customers on request at restaurant.

2.2.9 FUEL STORAGE

Diesel fuel storage tanks would be needed for the operation of four emergency generators at the casino, one emergency generator and one fire pump for the hotel, and one emergency generator for the wastewater treatment facility. Fuel tanks would be housed above ground within the individual generator units. The largest generators would have storage tanks of approximately 1,000 gallons. The storage tanks would have double walls with integrated leak detection systems. If a leak were to occur within the inner tank, the outer tank would contain the leak, while a pressure sensor would signal the leak on the indicator panel of the generator unit. Generator units would be monitored by security personnel who would be on-site at all times and trained in emergency response procedures. The generators would be located in areas easily accessed by maintenance and emergency personnel, near the service entrance/loading docks.

2.2.10 MEMORANDA OF UNDERSTANDING

CITY OF ROHNERT PARK

On October 14, 2003, the Tribe entered into a MOU with the City of Rohnert Park. In the MOU, the Tribe agreed to compensate the City annually for potential and perceived impacts of the facility to be located on the Stony Point Site. In turn, the City agreed not to oppose efforts by the Tribe to take the Stony Point Site into trust and develop a gaming facility on the site (MOU, 2003). The Tribal/Rohnert Park MOU can be found in **Appendix E**. As currently worded, the Tribal/Rohnert Park MOU does not apply to the Wilfred Site. However, given the close proximity of the Wilfred Site to the Stony Point Site, after informal discussions with the Tribe and the City of Rohnert Park, and given the Tribe's passage of Resolution 05-14 on August 10, 2005 reaffirming the Tribe's commitment to abide by the principle terms and conditions of the 2003 MOU (**Appendix E**), it is

assumed that the terms of a MOU inclusive of the Wilfred Site would be the same as or similar to those of the existing MOU, as described below.

The Tribe agreed in the MOU to withhold trust transfer until after the National Environmental Policy Act (NEPA) environmental review process is completed. The Tribe also agreed to a variety of one-time and recurring monetary contributions to the City, as well as a variety of non-monetary provisions. These provisions are described in more detail below. Both the City and the Tribe expressly agreed to waive sovereign immunity in favor of the other party and the developer as to any civil action relating to claims of breach of the MOU (MOU, 2003).

After negotiating the MOU, Mayor Gregory Nordin sent a letter to Governor Schwarzenegger, encouraging the Governor to negotiate and sign a Tribal-State Gaming Compact with the Tribe. Sent on March 30, 2004, this letter can be found following the Tribal/Rohnert Park MOU in **Appendix E**. In the letter, Mayor Nordin emphasizes that the nature of the MOU is unprecedented in California and recommends it be used as a model for other municipalities (Nordin, 2004).

Non-Recurring Contributions

The Tribe agreed to contribute $2,664,000 to the City prior to construction. This contribution is meant to be in lieu of the development and related fees the City would receive for the development of a commercial project if the land were located within the boundaries of the City. The amount of this contribution was calculated based on the City's standard development fees, capital outlay fund fees, and traffic signalization fees multiplied by the expected square footage of the facility (MOU, 2003).

The Tribe agreed in the MOU to make non-recurring contributions to numerous local traffic projects. The Tribe agreed to contribute up to $1,750,000 (one-half the cost) to complete the widening of Wilfred Avenue from U.S. Route 101 (US-101) west to the City's urban growth boundary in accordance with the City's General Plan. The Tribe agreed to contribute up to $900,000 (the entire cost) to complete the widening of Rohnert Park Expressway from Rancho Verde Circle to the western City limits in accordance with the City's General Plan. The Tribe agreed to contribute its fair share of up to $5,000,000 to pay for the construction of a "minor arterial" crossing US-101 to connect State Farm and Business Park drives in accordance with the City's General Plan, provided the City is able to collect additional funds for construction from other sources. According to the MOU, contributions will be made in periodic installments in accordance with a construction schedule to be mutually agreed upon by the City and the Tribe. Upon the request of the City, the Tribe agreed to contribute up to $200,000 (the entire cost) for installation of an on-demand activated traffic light at the entrance to the Rancho Verde Mobile Home Park (MOU, 2003).

The Tribe agreed in the MOU to make non-recurring contributions to numerous local public safety-related projects. The Tribe agreed to contribute $2,250,000 to the City to be used to construct a new public safety building (including a two-story training tower) on the west side of the City or at a location mutually agreed upon by the City and the Tribe. The contribution(s) would be timed with the intent that the public safety building be constructed and staffed prior to the opening of the proposed facility. The Tribe agreed to contribute $350,000 to the City for the purchase of a Type 1 fire engine that would be stationed at the new public safety building. The contribution(s) would be timed with the intent that the fire engine be purchased prior to the opening of the proposed facility. The Tribe agreed to contribute $410,000 to the City to be used for the purchase of public safety vehicles. The contribution(s) would be timed with the intent that the public safety vehicles be purchased prior to the opening of the proposed facility. The Tribe agreed to contribute up to $75,000 to enable the City to relocate the existing repeater system to the new public safety building. The Tribe agreed to contribute $700,000 to the City to establish a neighborhood enforcement team to combat gangs, illegal drug use, and other criminal activity (MOU, 2003). This latter contribution has been made, as agreed by the Tribe. The Tribe has since made subsequent annual payments of $500,000 to the City to maintain this program even though the MOU allows the Tribe to suspend these payments if construction of the facility has not started by June 30, 2006.

In order to mitigate the loss of open space and community separator areas associated with the development of the project, the Tribe agreed, after consultation with the City and not later than six months after the opening of the project, to either purchase real property with a purchase price up to $2,700,000 and donate it to the City for public use, or contribute $2,700,000 to the City for the purchase of such property (MOU, 2003).

In order to mitigate potential impacts of the project on the Rancho Verde Mobile Home Park, the Tribe agreed to contribute up to $700,000 to mitigate the preexisting stormwater flooding problem in the Rancho Verde and Martin Avenue area and to mitigate any significant noise impacts at Rancho Verde, as identified in the NEPA process. According to the MOU, this contribution(s) would occur prior to the opening of the project (MOU, 2003).

Recurring Contributions

The Tribe agreed to make annual contributions of $500,000 to the City to support the neighborhood enforcement team discussed above. The Tribe agreed that, commencing on the casino's opening date, it will make an annual contribution of $125,000 to a local organization dedicated to the treatment and prevention of problem or pathological gambling disorders. In order to mitigate potential impacts of the project on stormwater drainage, the Tribe has agreed to make annual contributions of $50,000 to the City to be used to address stormwater drainage matters (MOU, 2003).

The Tribe agreed to establish the "Graton Rancheria Educational Trust for Cotati-Rohnert Park Unified School District (USD)" (Educational Trust) no later than 30 days after the project's opening date. The Tribe agreed to make an annual contribution of $1,000,000 to the Educational Trust, which would be governed by a board of directors consisting of two members designated by the Tribe, two members designated by the Cotati-Rohnert Park USD, and one member chosen by the other four members. Funds in the Educational Trust would be used to provide block grants to support the instructional programs of the Cotati-Rohnert Park Unified School District and otherwise mitigate potential impacts of the project (MOU, 2003).

The Tribe agreed to establish the "Graton Rancheria Charitable Foundation" (Charitable Foundation) no later than 30 days after the project's opening date. The Tribe agreed to make an annual contribution of $2,000,000 to the Charitable Foundation, which would be governed by a board of directors consisting of two members designated by the Tribe, two members designated by the City, and one member chosen by the other four members. Funds in the Charitable Foundation would be invested in programs that benefit the City or otherwise mitigate the impacts of the project (MOU, 2003).

The Tribe agreed to make an annual contribution of $1,000,000 no later than 30 days after the project's opening date to the City to be used for neighborhood upgrade or workforce housing programs. The City alone would have the authority to determine the use and distribution of these funds (MOU, 2003).

The Tribe agreed to make an annual contribution of $5,000,000 no later than 30 days after the project's opening date to mitigate additional potential impacts of the project. The City and the Tribe agreed that this amount would be sufficient to mitigate any unidentified impacts of the project (MOU, 2003).

Non-Monetary Provisions

The Tribe agreed to implement a hiring preference for Native Americans and City residents subject to collective bargaining agreements and federal employment laws and regulations. The Tribe agreed to provide reasonable information and assistance to public entities to facilitate efforts to fast-track the Wilfred Avenue/Golf Course Drive interchange construction and US-101 widening from Wilfred Avenue to Old Redwood Highway. The Tribe agreed to hire and has hired a qualified traffic engineering firm to conduct a traffic engineering study that would identify off-site impacts on traffic (MOU, 2003).

The Tribe agreed to various non-monetary public safety provisions. The Tribe agreed to construct the gaming facility and all supporting buildings in accordance with standards no less stringent than those set forth in the Uniform Fire Code as adopted, amended, and incorporated into the Rohnert

Park Municipal Code, including the installation of sprinklers in all hotel rooms and restaurants. The Tribe agreed to provide the City with monthly fire inspection certifications during construction and annual fire inspection certifications during operation of the facility. The Tribe agreed to allow the City to review the design plans for exits. The Tribe agreed to prohibit anyone under 21 years of age from gambling, adopt employee training programs and policies relating to responsible beverage service, conduct background checks of all gaming employees, provide a full complement of security personnel at all times, and adopt programs and policies that discourage gang members from visiting the Tribe's gaming facility. The Tribe agreed to provide emergency medical training to certain members of the security staff and provide emergency medical equipment, including defibrillators (MOU, 2003). Security staff will be trained for natural disaster response.

To the extent determined commercially reasonable, the Tribe agreed to implement recycling, green waste diversion (reusing instead of disposing of green waste where possible), and design buildings using green building techniques. Single stream recycling involves mixed recycling of unsorted materials, such as #1-#7 plastics (i.e., bottles, jugs, bags), metal products (i.e., aluminum cans, tin, steel, foil pie plates, empty spray cans), cardboard, glass and paper (i.e., newspapers, magazines, catalogs). Green waste refers to solid waste involving plant materials such as grass clippings and yard trimmings. "Diversion" is defined in the California PRC in Section 40124 as: "activities which reduce or eliminate solid waste from solid waste disposal." The Tribe agreed to adopt and construct the gaming facility and all supporting buildings in accordance with standards no less stringent than those set forth in the Uniform Building Code, including all Uniform Fire, Plumbing, Electrical, Mechanical, and related Building Codes, as adopted, amended, and incorporated into the Rohnert Park Municipal Code. The Tribe agreed to annually certify to the City that it is complying with such building codes and standards (MOU, 2003).

The Tribe agreed not to conduct a variety of activities that were not proposed by the Tribe, but were nonetheless important to the City. The Tribe agreed not to purchase the adjacent Rancho Verde Mobile Home Park for at least 20 years from the date of the MOU. The Tribe agreed not to construct a golf course for at least 20 years from the date of the MOU or after at least 150,000 rounds of golf are played on the City's golf courses in a year (MOU, 2003).

Upon the request of the Tribe, the City agreed to enter into a Mutual Aid Agreement with the Tribe for fire and law enforcement services (MOU, 2003).

SONOMA COUNTY

The Tribe entered into a MOU with Sonoma County, effective November 1, 2004. Under the MOU both the Tribe and the County agreed, no later than 30 days following the publication of the Draft EIS, to "commence diligent and good faith negotiations" towards executing an intergovernmental agreement. The purpose of an intergovernmental agreement is to provide for a binding and

enforceable agreement to insure the timely mitigation of any of the project's significant environmental impacts that occur within the County. The MOU references the following expected payments to the County: reasonable and fair share compensation for specific public services provided by the County for the Tribe's gaming operation, reasonable and fair share contributions for gambling addiction programs, reasonable and fair share compensation for mitigation of public safety and criminal justice system impacts attributable to the casino, and reasonable and fair share contributions to the County for lost tax, fee, assessments, or other revenue to the County related to the trust acquisition. The MOU also specifically references providing mitigation for expected impacts to agricultural resources, air quality, biological resources, geology and soils, land use, hazardous materials, noise, public services, public transportation, roadway infrastructure, socioeconomic effects, traffic circulation, traffic safety, visual resources, wastewater, water drainage and water supply. The MOU includes an arbitration process in order to provide that an intergovernmental agreement is negotiated, as desired by both parties (MOU, 2004). The Sonoma County MOU can be found in **Appendix E**.

TRIBAL LABOR AGREEMENT

On September 13, 2003, the Tribe entered into an agreement with the Sonoma, Lake, Mendocino County Building and Construction Trades Council and its affiliated local unions to establish provisions for construction employees hired by the Tribe. Under the agreement, the Tribe would exercise control over the development site and retain overall authority for the construction of the casino, hotel, and related amenities. The agreement covers, "all on-site construction, alteration, painting or repair of buildings, structures and other works and related activities for the project which is within the craft jurisdiction of one of the Unions and which is directly or indirectly part of the project" (Project Labor Agreement, 2003). This agreement is applicable to all manual labor employees hired during the construction phase of the development of the casino/hotel project on the Wilfred, Stony Point, and Lakeville sites. A copy of this agreement is provided in **Appendix E**.

Similarly, on August 6, 2007, the Tribe entered into an agreement with the Hotel Employees and Restaurant Employees (H.E.R.E.) International Union, AFL-CIO. The agreement establishes terms and conditions that the Tribe shall comply with regarding the unionization of future eligible employees hired during the operation of the proposed development. The purpose of this agreement is to provide that casino and hotel employees have the ability to exercise their rights under the Tribal Labor Relations Ordinance, which shall be adopted by the Tribe and is similar to Tribal Labor Relations Ordinances attached to Compacts between the state and certain tribes in California (MOA, 2003). This agreement is only applicable to casino and hotel employees for the alternatives proposed on the Wilfred, Stony Point, and Lakeville sites. Additionally, the Tribe has agreed to a "Card Check Recognition Procedure" to validate the status of eligible employees as Union members. This agreement is also provided in **Appendix E**.

2.3 ALTERNATIVE B – NORTHWEST STONY POINT CASINO

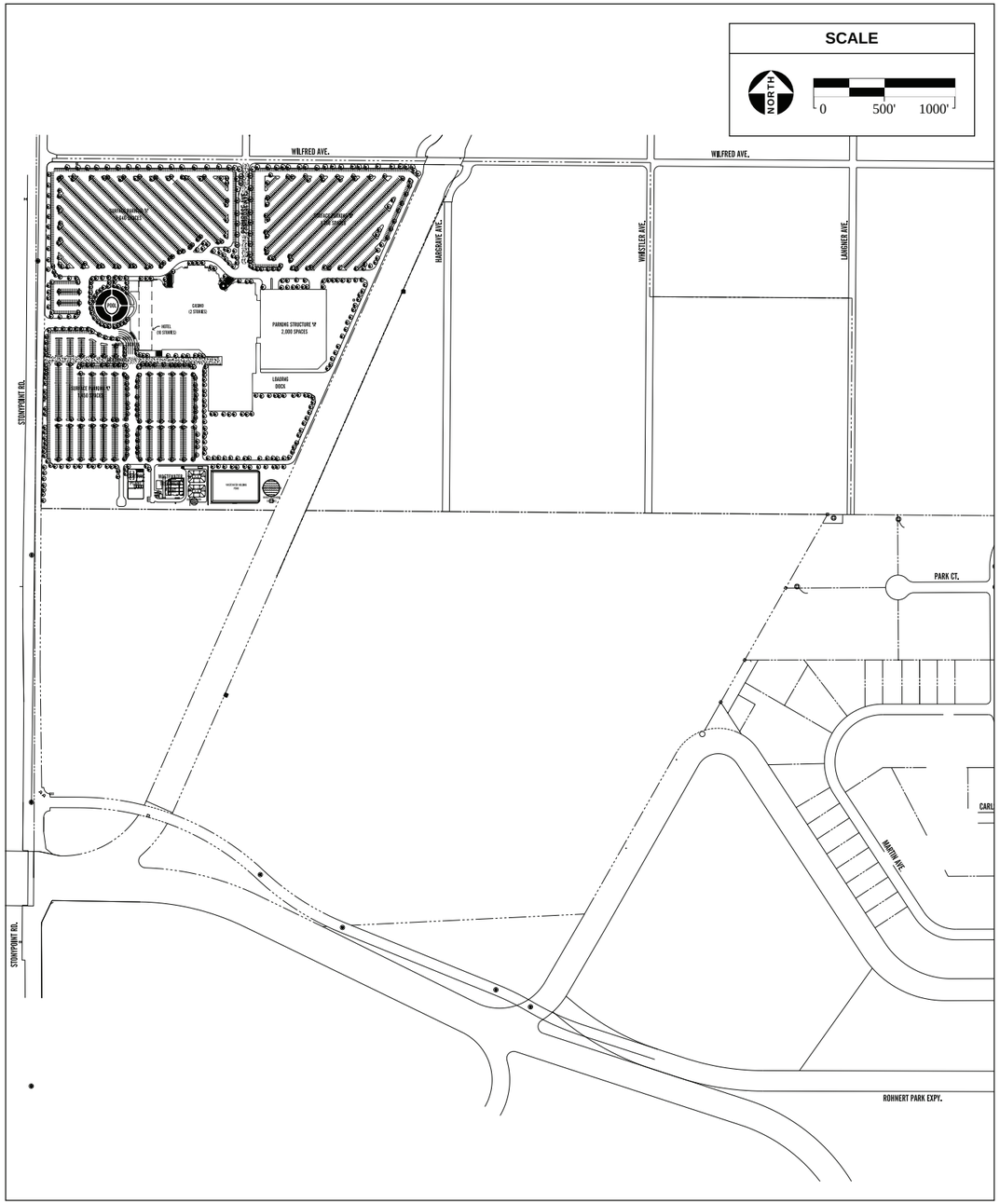
Alternative B consists of the development of a casino-hotel resort on the northwest portion of approximately 360 acres of land (Stony Point Site) that would be taken into trust for the Tribe. The Stony Point Site is described in more detail in **Section 1.3.2**. Under Alternative B, the development of a casino-hotel resort is planned on approximately 76 acres of the northwest corner of the Stony Point Site (**Figure 2-8**). The remainder of the Stony Point Site would remain undeveloped and be used for open space, pasture, biological habitat, and recycled water sprayfields (uses consistent with the Williamson Act restrictions currently present on the southern portion of the Stony Point Site). The components of the casino-hotel resort would be the same as those proposed for Alternative A (**Table 2-1**), and the exterior design of the casino-hotel resort would be very similar to that shown in **Figure 2-2**. The exact layout of the various components of the casino-hotel resort would be reconfigured to accommodate the northwest corner of the Stony Point Site. Employment and Tribal-State Compact (or Secretarial procedures) terms would not differ from those of Alternative A. Access to the casino-hotel resort would be gained at existing access points along Wilfred Avenue and Stony Point Road.

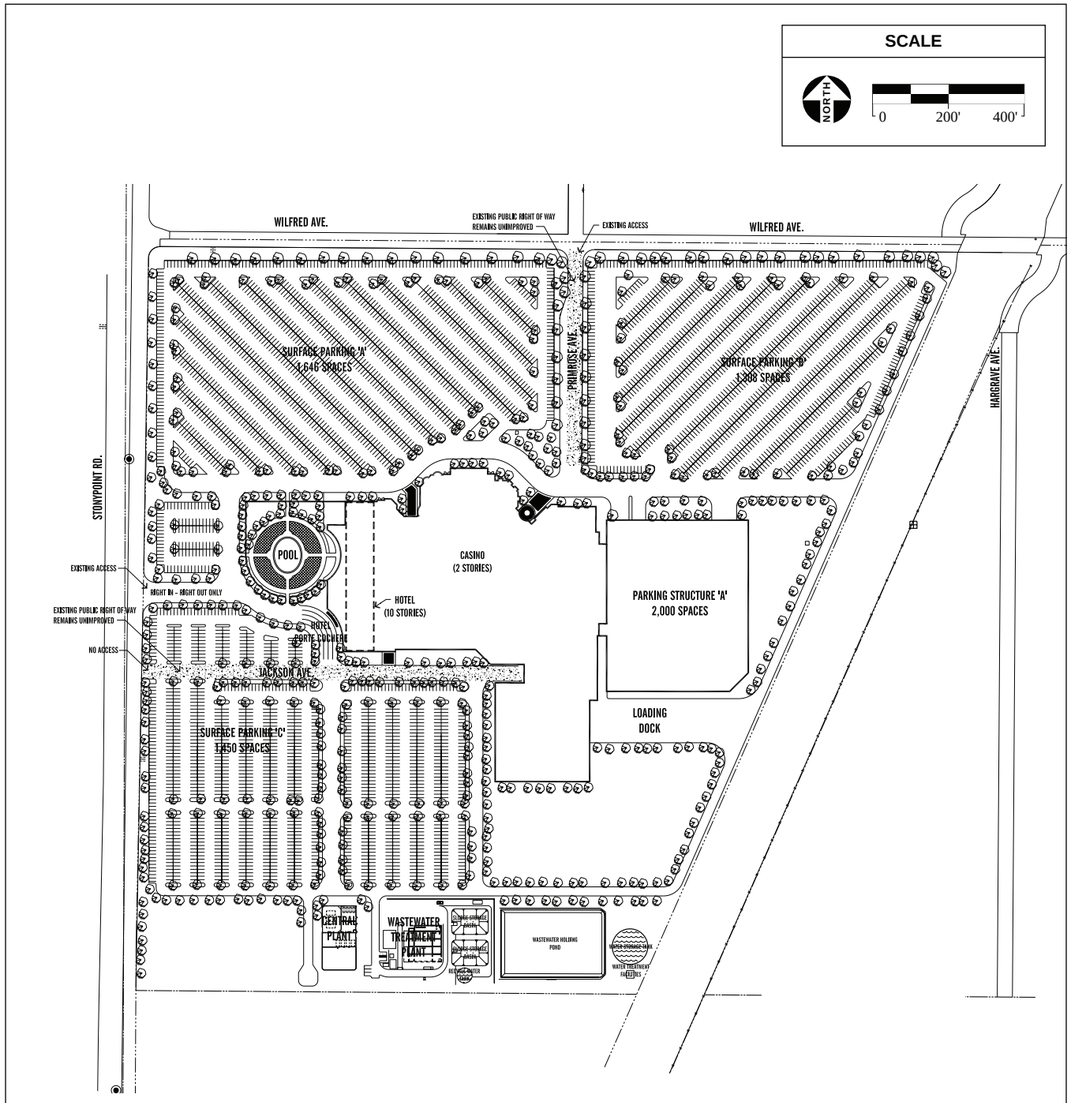
2.3.1 MANAGEMENT CONTRACT

As with Alternative A, Alternative B would require NIGC approval of a management contract between the Tribe and SC Sonoma Management or its affiliates before gaming could take place on the Northwest Stony Point Site (see **Section 2.2.1**).

2.3.2 CASINO AND RELATED AMENITIES

The design and components of the casino facility would be identical to those of Alternative A (see **Section 2.2.2** and **Table 2-1**). As with Alternative A, alcohol would be served throughout the casino, including the gaming floor. Accordingly, casino patrons would be required to be 21 years of age or older, and the Tribe would adopt a "Responsible Alcoholic Beverage Policy" that would include, but not be limited to, checking the identification of patrons and refusing service to those who are visibly intoxicated. Smoking would be permitted within the casino facility; however, non-smoking sections would be provided.





SOURCE: Friedmutter Group, 7/22/2004; AES, 2006

Figure 2-8
Alternative B – Site Plan

2.3.3 HOTEL AND SPA

The design and components of the hotel and spa would be nearly identical to those of Alternative A (see **Section 2.2.3** and **Table 2-1**).

2.3.4 PARKING

A total of approximately 6,102 parking spaces would be provided to serve the patrons and employees of the resort and supporting facilities. A parking structure, providing a total of 2,000 parking spaces, would be connected to the eastern elevation of the casino.

2.3.5 CONSTRUCTION

Alternative B would be constructed after the Stony Point Site has been placed into federal trust. Construction duration is estimated at 27 months. As with Alternative A, construction would involve earthwork; placement of concrete foundations; steel, wood and concrete structural framing; masonry; electrical and mechanical work; building and site finishing; and paving, among other construction activities. The Tribe would adopt the building standards and BMPs previously stated for Alternative A. A preliminary grading plan can be found in **Appendix C**.

Construction would also entail removal of the barn and associated features located in the northwest corner of the proposed casino-hotel development area (**Figure 2-9**). The structures consist of a large gabled barn and associated cattle-related features. The barn is about 140 feet long and is clad in vertical board-and-batten siding with a corrugated sheet metal roof and doors. Associated with the barn is rail fencing that forms a corral and loading chute, large, round water troughs made of poured concrete, and a feed box.

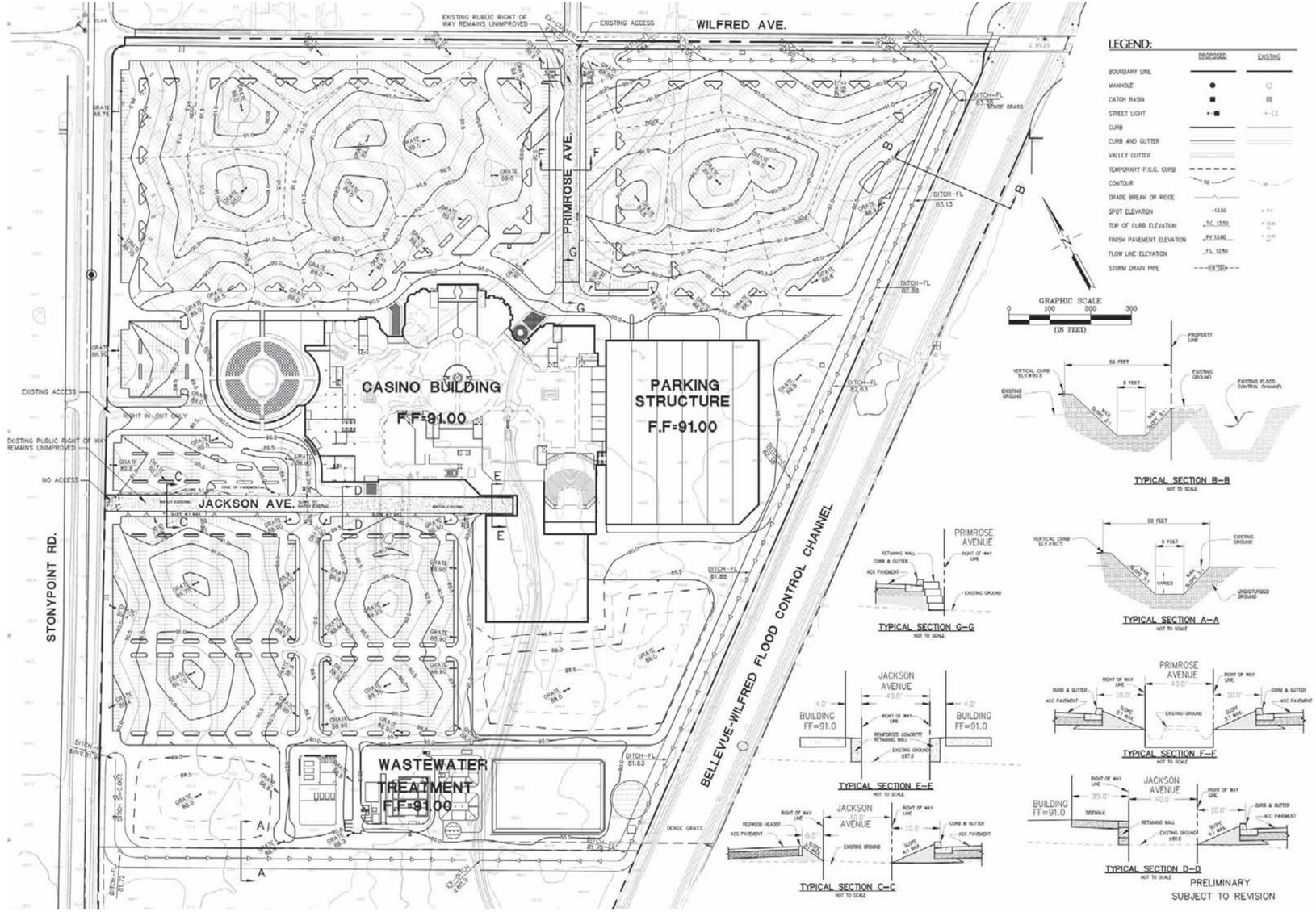
2.3.6 DRAINAGE

Included in **Appendix C**, the preliminary grading and drainage plan for Alternative B incorporates fill to elevate the proposed gaming facility above the 100-year floodplain. All of the proposed facilities would be constructed at least one foot above the 100-year floodplain elevation. Specifically, the buildings would be approximately five feet above the floodplain and the parking lot would be approximately one foot above the floodplain. It is estimated that 150,000 cubic yards of earthwork will be required for Alternative B. On-site excavation from the southern portion of the site would yield the necessary fill material, resulting in a "balanced" site (**Appendix C**). Runoff from the Northwest Stony Point Site would be conveyed by an underground drainage system to a stormwater detention system, and, after filtration, to the Bellevue-Wilfred Channel, which feeds into Laguna de Santa Rosa (**Figure 2-10**). The drainage plan would be very similar to that proposed for Alternative A, except that it would be modified to account for the different site layout necessitated by the location of the casino-hotel resort on the

A 140-foot-long barn located near the northwest quarter of the Stony Point site. The barn has vertical board-and-batten siding with a corrugated sheet metal roof and doors. Associated with the barn is rail fencing that forms a corral and loading chute, poured concrete water troughs and a feed box for cattle.

SOURCE: AES, 2005

Figure 2-9
Alternative B - Site Photo



SOURCE: Robert A. Korn & Associates, 2004; AES, 2005

Figure 2-10
Alternative B – Grading/Drainage Plan

northwest corner of the Stony Point Site. See **Section 2.2.6** (Alternative A) for further detail describing project runoff and stormwater filtration.

A stormwater detention system would be provided on-site to reduce increased peak flows that would result from site development. A total of approximately 113.5 acre-feet of storage would be provided in the stormwater detention system to account for the increase in runoff created by increased impervious surfaces, encroachment of fill into the floodplain and the potential treated wastewater discharge into the Bellevue-Wilfred Channel. The detention system would be located in the southern portion of the Stony Point Site and would be designed to create functioning wetlands, thereby mirroring natural conditions and enhancing wildlife habitat (**Figure 2-11**).

2.3.7 WASTEWATER TREATMENT AND DISPOSAL

Wastewater treatment and disposal for Alternative B would be provided by one of two on-site options. The wastewater treatment facility planned for Alternative B would not change in size or scope from that proposed for Alternative A and would also be designed to comply with standards established by the USEPA (see **Section 2.2.7**).

The location of the wastewater treatment facility is presented in **Figures 2-12** and **2-13.** A detailed description of the wastewater treatment facility is presented in **Appendix D**. As discussed in **Appendix D**, the elements of the wastewater treatment and disposal facility include a wastewater treatment plant, wastewater piping, landscape irrigation, surface disposal, and a recycled water reservoir. Refer to **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation. As shown in **Table 2-2**, wastewater disposal would take place by one of the following two options.

OPTION 1

Presented in **Figure 2-12**, the first option assumes all effluent will be disposed of through sprayfields in the northeast quadrant of the Stony Point Site from April to October, but water produced during the wet season will be disposed of in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel. Treated wastewater will flow within existing drainage channels and through an existing 54-inch culvert on the west side of the Bellevue-Wilfred Channel.

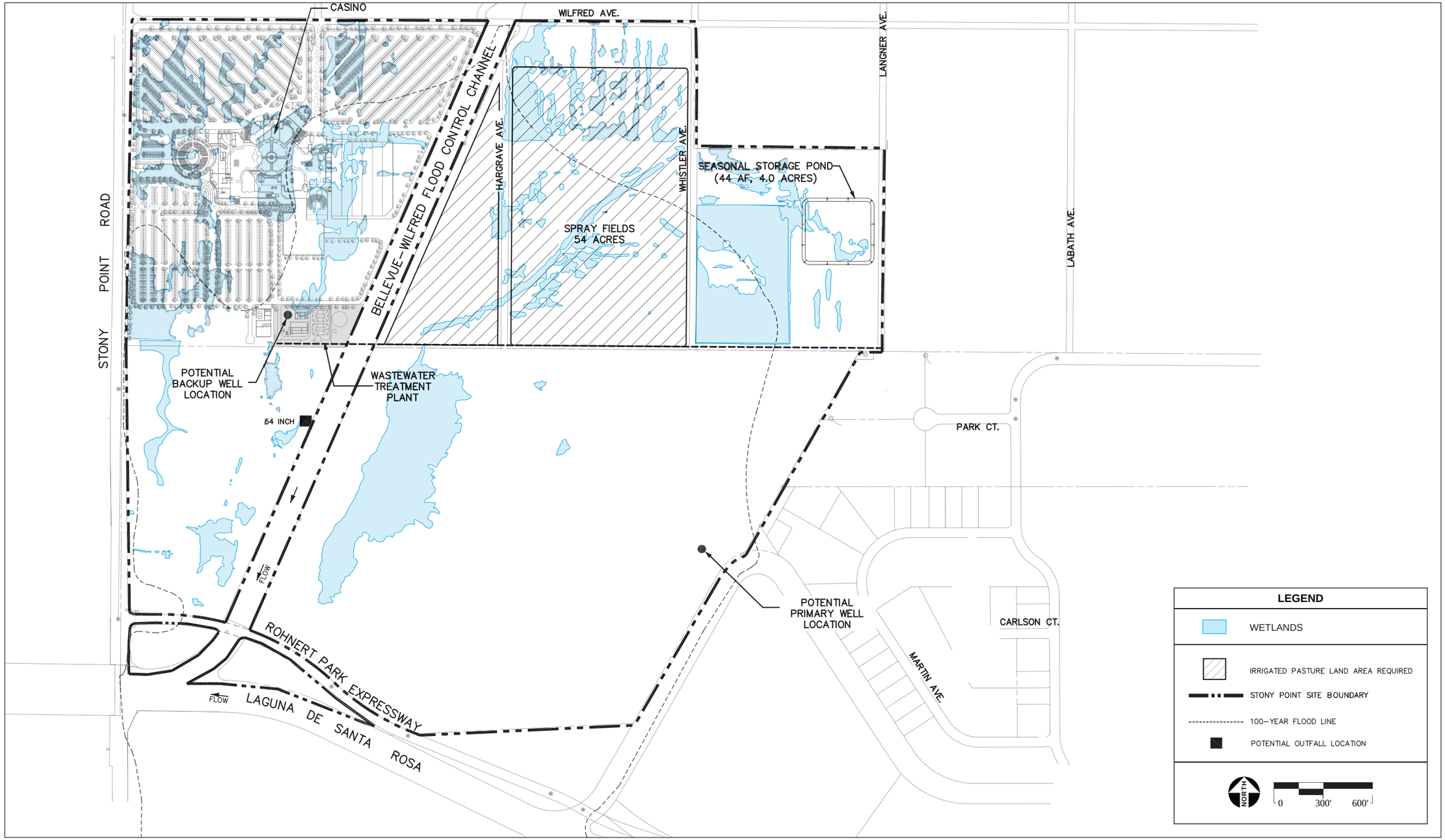
OPTION 2

Presented in **Figure 2-13**, the second option assumes all effluent will be disposed of through sprayfields of increased acreage in the northeast and southeast quadrants of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year.

SOURCE: Aerial Photography August 2002; Huffman Broadway Group, Inc. , 2004; Robert A. Karn & Associates, Inc.; AES, 2008

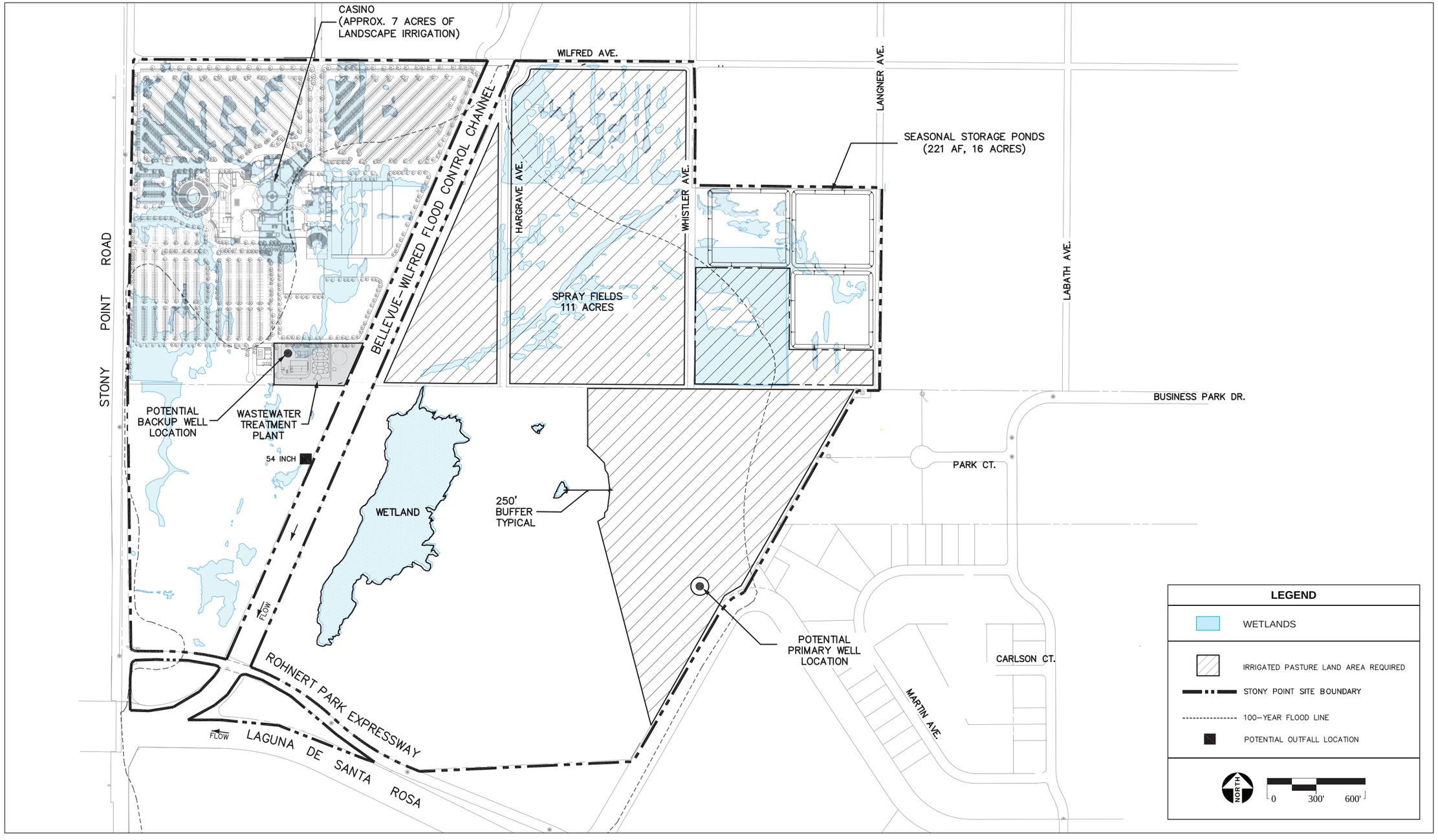
Figure 2-11

Alternatives A, B, D, E and H – Grading/Drainage Plan – Stormwater Detention / Floodplain Storage



SOURCE: HydroScience Engineers, 11/8/2007; AES, 2008

Figure 2-12
Alternative B – Water / Wastewater Facilities (Option 1)



SOURCE: HydroScience Engineers, 11/8/2007; AES, 2008

Figure 2-13
Alternative B – Water / Wastewater Facilities (Option 2)

2.3.8 WATER SUPPLY

As with Alternative A, water for domestic use, emergency supply, and fire protection would be provided by on-site wells. Elements of the proposed on-site water facilities include two on-site wells, an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system.

As with Alternative A, recycled water would be utilized for landscape irrigation and potentially toilet flushing. The estimated water demands and proposed well and water system design would be the same as Alternative A. The proposed Alternative A water conservation measures would also apply to Alternative B.

2.3.9 FUEL STORAGE

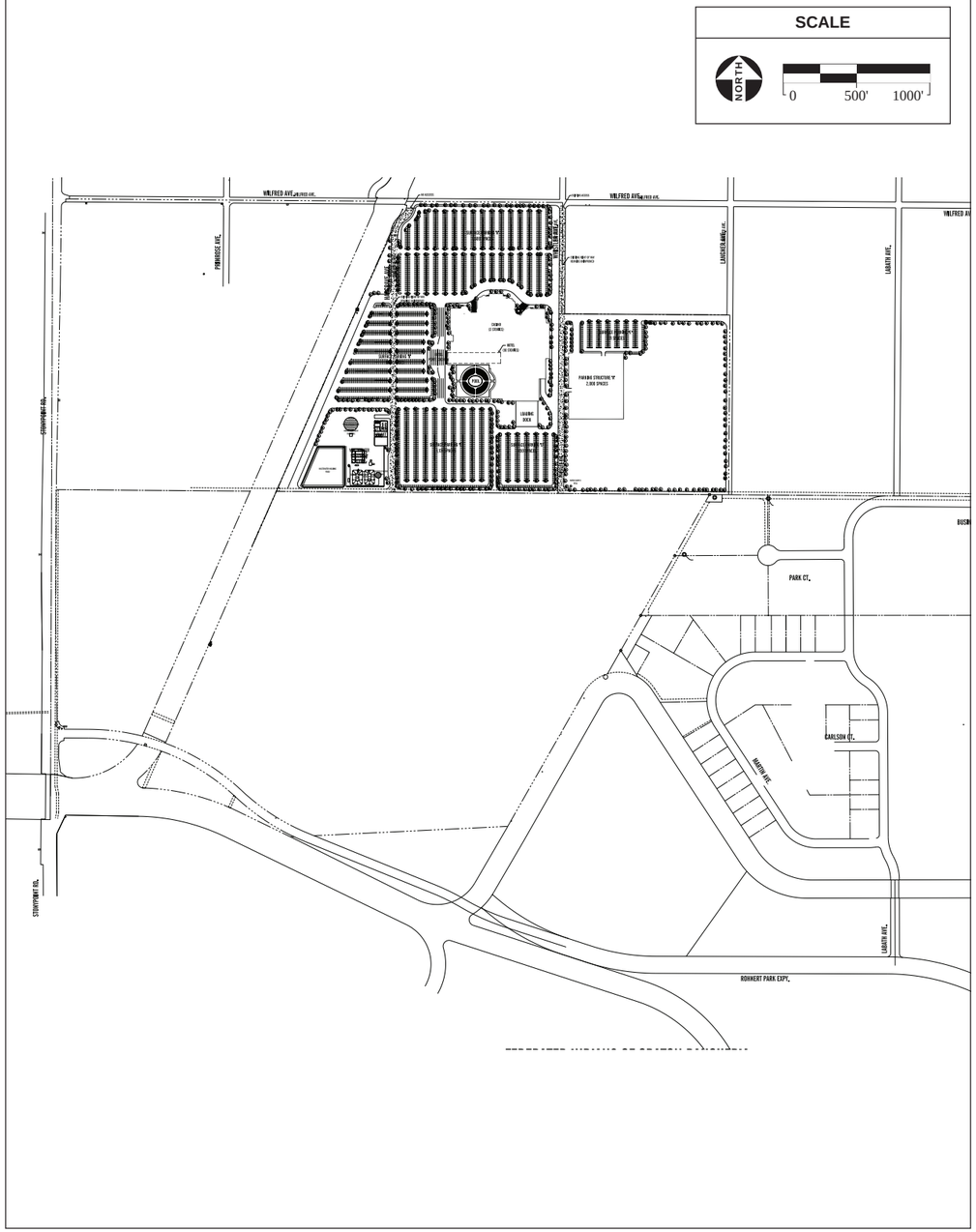
Fuel storage requirements and practices would be the same as those proposed in **Section 2.2.9** for Alternative A.

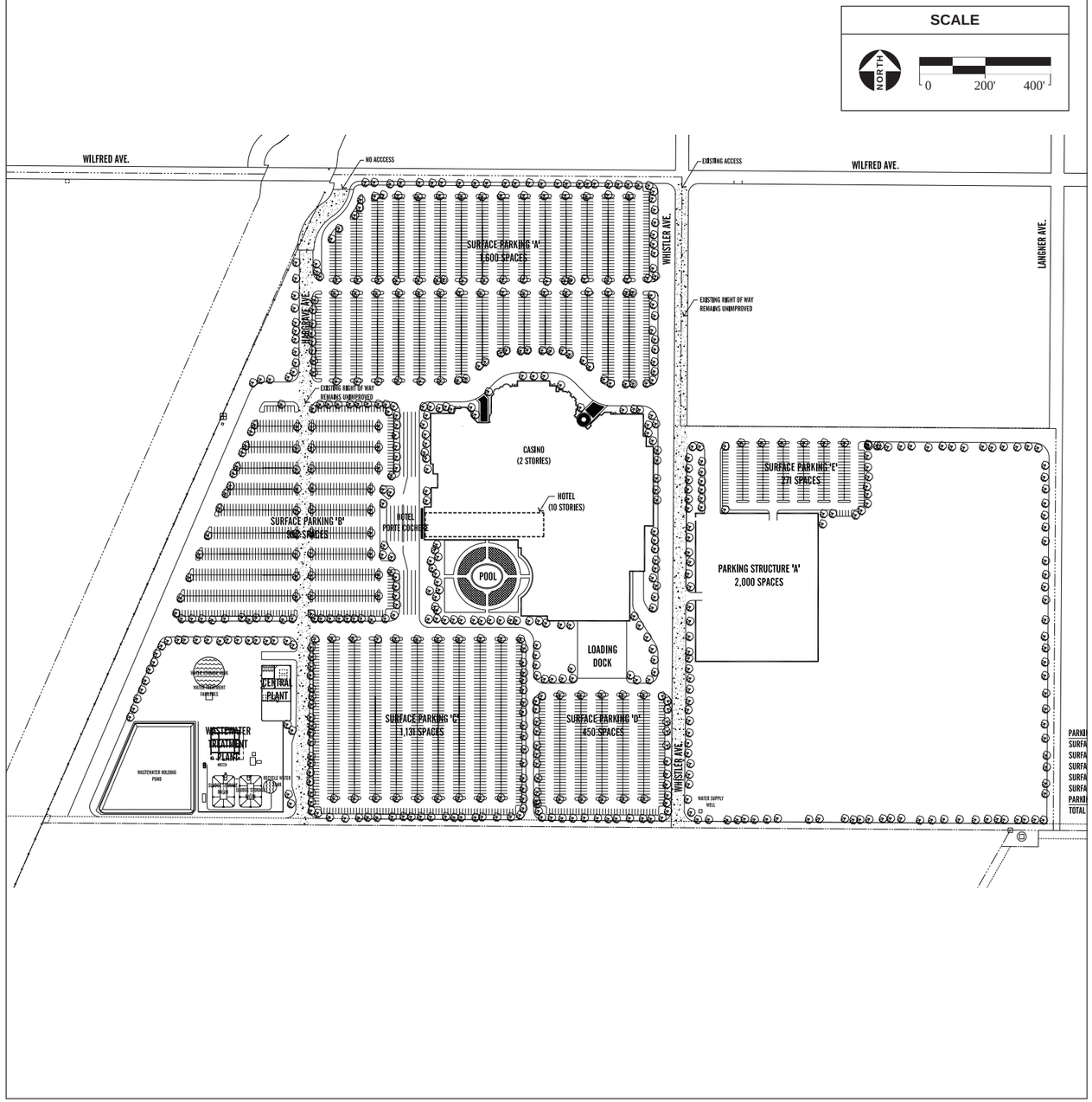
2.3.10 MEMORANDA OF UNDERSTANDING

The provisions for the MOUs described in **Section 2.2.10** for Alternative A would apply equally to Alternative B.

2.4 ALTERNATIVE C – NORTHEAST STONY POINT CASINO

Alternative C consists of the development of a casino-hotel resort on the northeast portion of approximately 360 acres of land (Stony Point Site) that would be taken into trust for the Tribe. The Stony Point Site is described in more detail in **Section 1.3.2**. Under Alternative C, the development of a casino-hotel resort is planned on approximately 101 acres of the northeast corner of the Stony Point Site (**Figure 2-14**). The remainder of the Stony Point Site would remain undeveloped and be used for open space, pasture, biological habitat, and recycled water sprayfields (uses consistent with the Williamson Act restrictions currently present on the southern portion of the Stony Point Site). The components of the casino-hotel resort would be the same as those proposed for Alternatives A and B shown in **Figure 2-2**. The exact layout of the various components of the casino-hotel resort would be reconfigured to accommodate the northeast corner of the Stony Point Site. Employment and Tribal-State Compact (or Secretarial procedures) terms would not differ from those of Alternative A. Access to the casino-hotel resort would be gained at existing access points along Wilfred Avenue.





SOURCE: Friedmutter Group, 7/22/2004; AES, 2006

Figure 2-14
Alternative C – Site Plan

2.4.1 MANAGEMENT CONTRACT

As with Alternative A, Alternative C would require NIGC approval of a management contract between the Tribe and SC Sonoma Management or its affiliates before gaming could take place on the Northeast Stony Point Site (see **Section 2.2.1**).

2.4.2 CASINO AND RELATED AMENITIES

The design and components of the casino facility would be the same as those of Alternative A (see **Section 2.2.2** and **Table 2-1**). As with Alternative A, alcohol would be served throughout the casino, including the gaming floor. Accordingly, casino patrons would be required to be 21 years of age or older, and the Tribe would adopt a "Responsible Alcoholic Beverage Policy" that would include, but not be limited to, checking the identification of patrons and refusing service to those who are visibly intoxicated. Smoking would be permitted within the casino facility; however, non-smoking sections would be provided.

2.4.3 HOTEL AND SPA

The design and components of the hotel and spa would be nearly identical to those of Alternative A (see **Section 2.2.3** and **Table 2-1**).

2.4.4 PARKING

As with Alternative A, a total of approximately 6,100 parking spaces would be provided to serve the patrons and employees of the resort and supporting facilities. A parking structure, providing a total of 2,000 parking spaces, would be located across the street from the eastern elevation of the casino.

2.4.5 CONSTRUCTION

Alternative C would be constructed after the Stony Point Site has been placed into federal trust. Construction duration is estimated at 27 months. As with Alternative A, construction would involve earthwork; placement of concrete foundations; steel, wood and concrete structural framing; masonry; electrical and mechanical work; building and site finishing; and paving, among other construction activities. The Tribe would adopt the building standards and BMPs previously stated for Alternative A. A preliminary grading plan can be found in **Appendix C**.

Construction would also entail removal of the barn and associated features located in the proposed wastewater disposal area in the northwest corner of the Stony Point Site (**Figure 2-9**). The barn is described in **Section 2.3.5**.

2.4.6 DRAINAGE

Included in **Appendix C**, the preliminary grading and drainage plan for Alternative C incorporates fill to elevate the proposed gaming facility above the 100-year floodplain. All of the proposed facilities would be constructed at least one foot above the 100-year floodplain elevation. Specifically, the buildings would be approximately five feet above the floodplain and the parking lot would be approximately one foot above the floodplain. It is estimated that 350,000 cubic yards of earthwork will be required for Alternative C. On-site excavation from the southern portion of the site would yield the necessary fill material, resulting in a "balanced" site (**Appendix C**).

Runoff from the Northeast Stony Point Site would be conveyed by an underground drainage system to a stormwater detention system, and, after filtration, to the Bellevue-Wilfred Channel, which feeds into Laguna de Santa Rosa (**Figure 2-15**). The drainage plan would be very similar to that proposed for Alternative B and would include the use of several features designed to filter surface runoff prior to release into the natural drainage channels on-site. A total of approximately 217 acre-feet of storage would be provided in the stormwater detention system to account for the increase in runoff created by increased impervious surfaces, encroachment of fill into the floodplain, and the potential treated wastewater discharge into the Bellevue-Wilfred Channel (**Figure 2-16**).

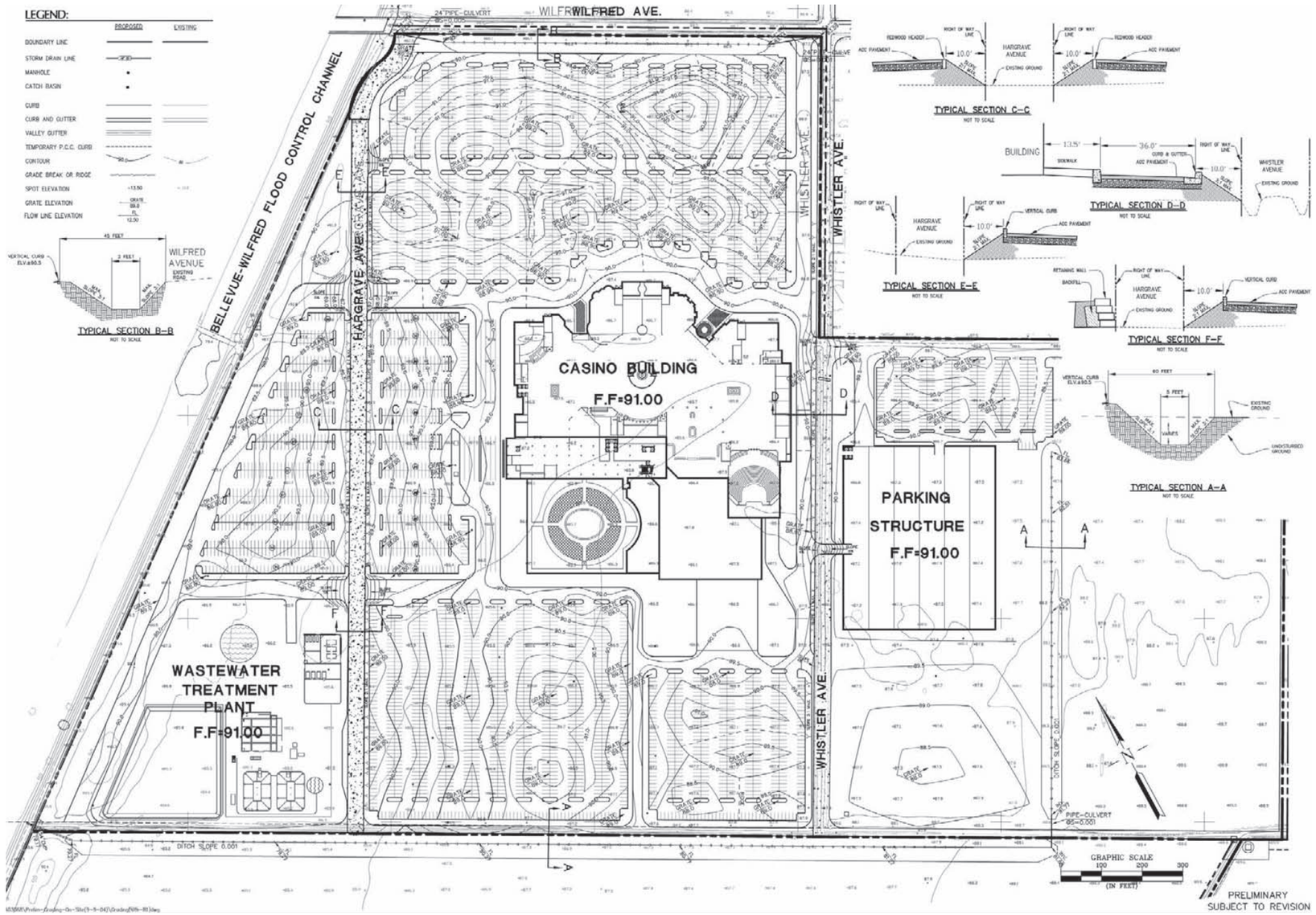
2.4.7 WASTEWATER TREATMENT AND DISPOSAL

Wastewater treatment and disposal for Alternative C would be provided by one of two on-site options. The wastewater treatment facility planned for Alternative C would not change in size or scope from that proposed for Alternative A and would also be designed to comply with standards established by the USEPA (see **Section 2.2.7**).

The location of the wastewater treatment facility is presented in **Figures 2-17** and **2-18.** A detailed description of the wastewater treatment facility is presented in **Appendix D**. As discussed in **Appendix D**, the elements of the wastewater treatment and disposal facility include a wastewater treatment plant, wastewater piping, landscape irrigation, surface disposal, and a recycled water reservoir. Please see **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation. As shown in **Table 2-2**, wastewater disposal would take place by one of the following two options.

OPTION 1

Presented in **Figure 2-17**, the first option assumes all effluent will be disposed of through sprayfields in the northwest quadrant of the Stony Point Site from April to October, but water



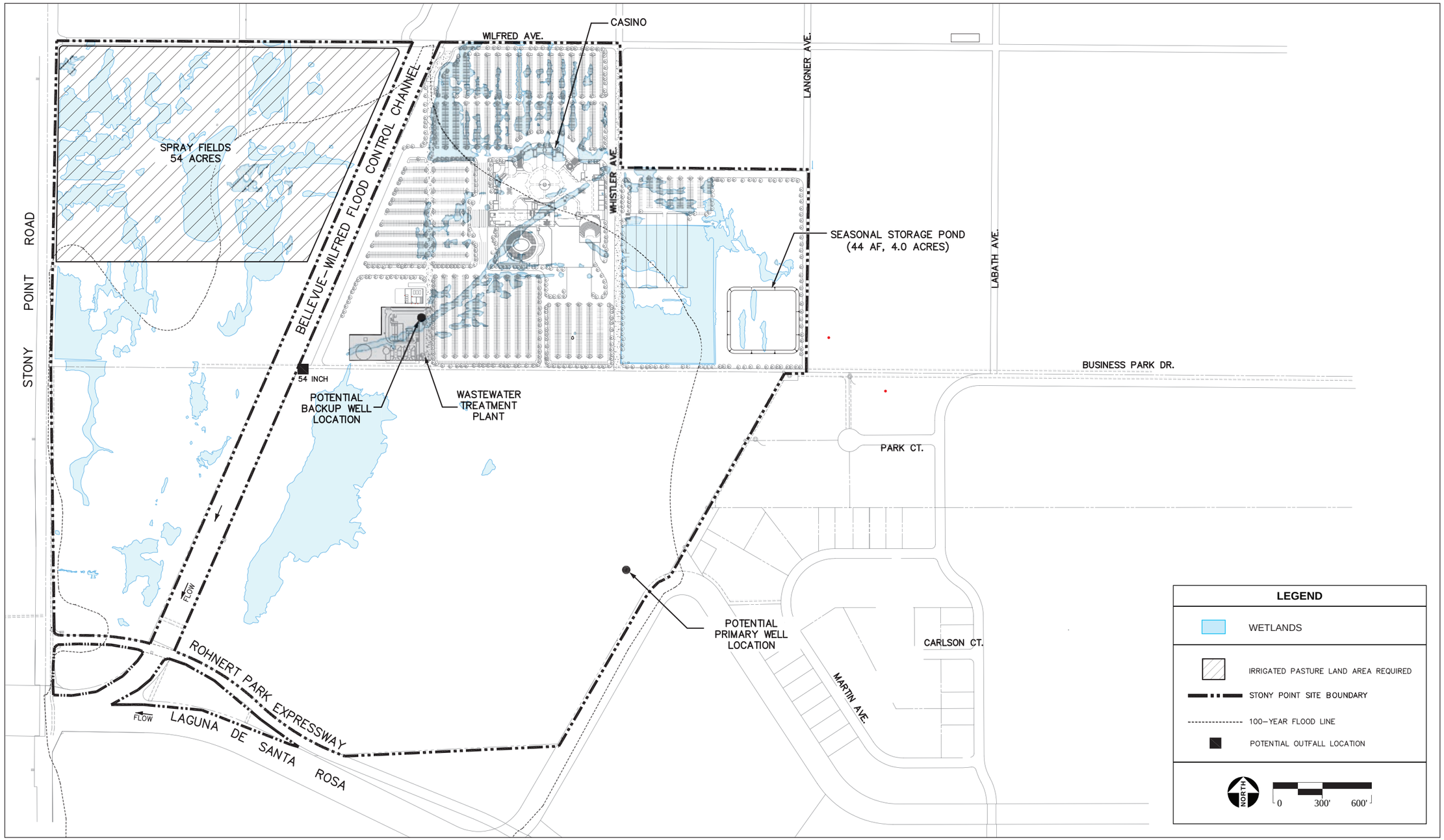
SOURCE: Robert A. Korn & Associates, 2004; AES, 2005

Figure 2-15
Alternative C – Grading/Drainage Plan

SOURCE: Aerial Photography August 2002 ; Huffman Broadway Group, Inc., 2004 ; Robert A. Karn & Associates, Inc.; AES, 2005

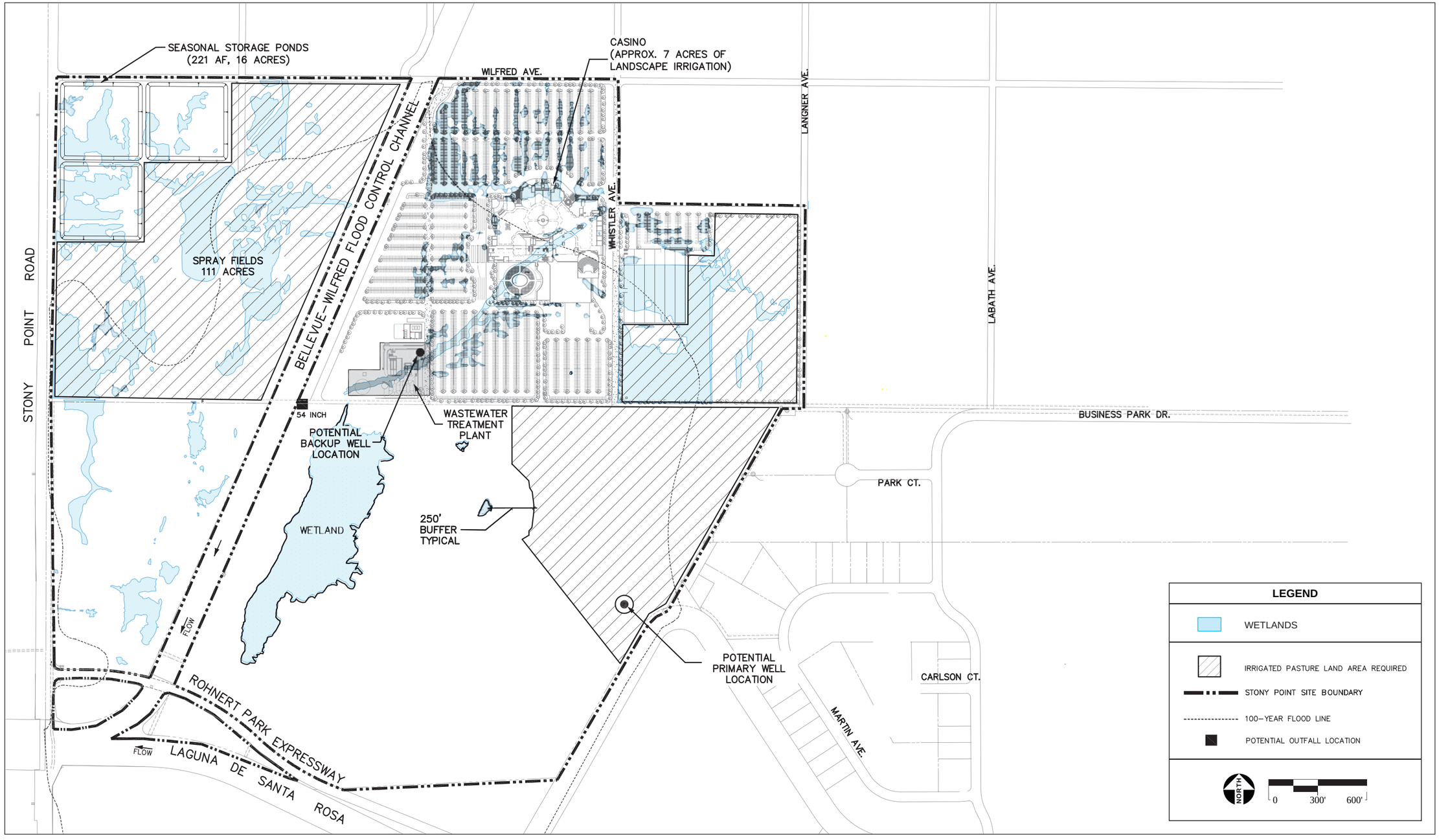
Figure 2-16

Alternative C – Grading/Drainage Plan – Stormwater Detention / Floodplain Storage



SOURCE: HydroScience Engineers, 11/8/2007; AES, 2008

Figure 2-17
Alternative C – Water / Wastewater Facilities (Option 1)



SOURCE: HydroScience Engineers, 11/8/2007; AES, 2008

Figure 2-18
Alternative C – Water / Wastewater Facilities (Option 2)

produced during the wet season will be disposed of in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel. Treated wastewater will flow within existing drainage channels and through an existing 54-inch culvert on the east side of the Bellevue-Wilfred Channel.

OPTION 2

Presented in **Figure 2-18**, the second option assumes all effluent will be disposed of through sprayfields of increased acreage in the northwest, northeast, and southeast quadrants of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year.

2.4.8 WATER SUPPLY

As with Alternative A, water for domestic use, emergency supply, and fire protection would be provided by on-site wells. Elements of the proposed on-site water facilities include two on-site wells, an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system.

As with Alternative A, recycled water would be utilized for landscape irrigation and potentially toilet flushing. The estimated water demands and proposed well and water system design would be the same as Alternative A. The proposed Alternative A water conservation measures would also apply to Alternative C.

2.4.9 FUEL STORAGE

Fuel storage requirements and practices would be the same as those proposed in **Section 2.2.9** for Alternative A.

2.4.10 MEMORANDA OF UNDERSTANDING

The provisions of the MOUs described in **Section 2.2.10** for Alternative A would apply equally to Alternative C.

2.5 ALTERNATIVE D – REDUCED INTENSITY (STONY POINT SITE)

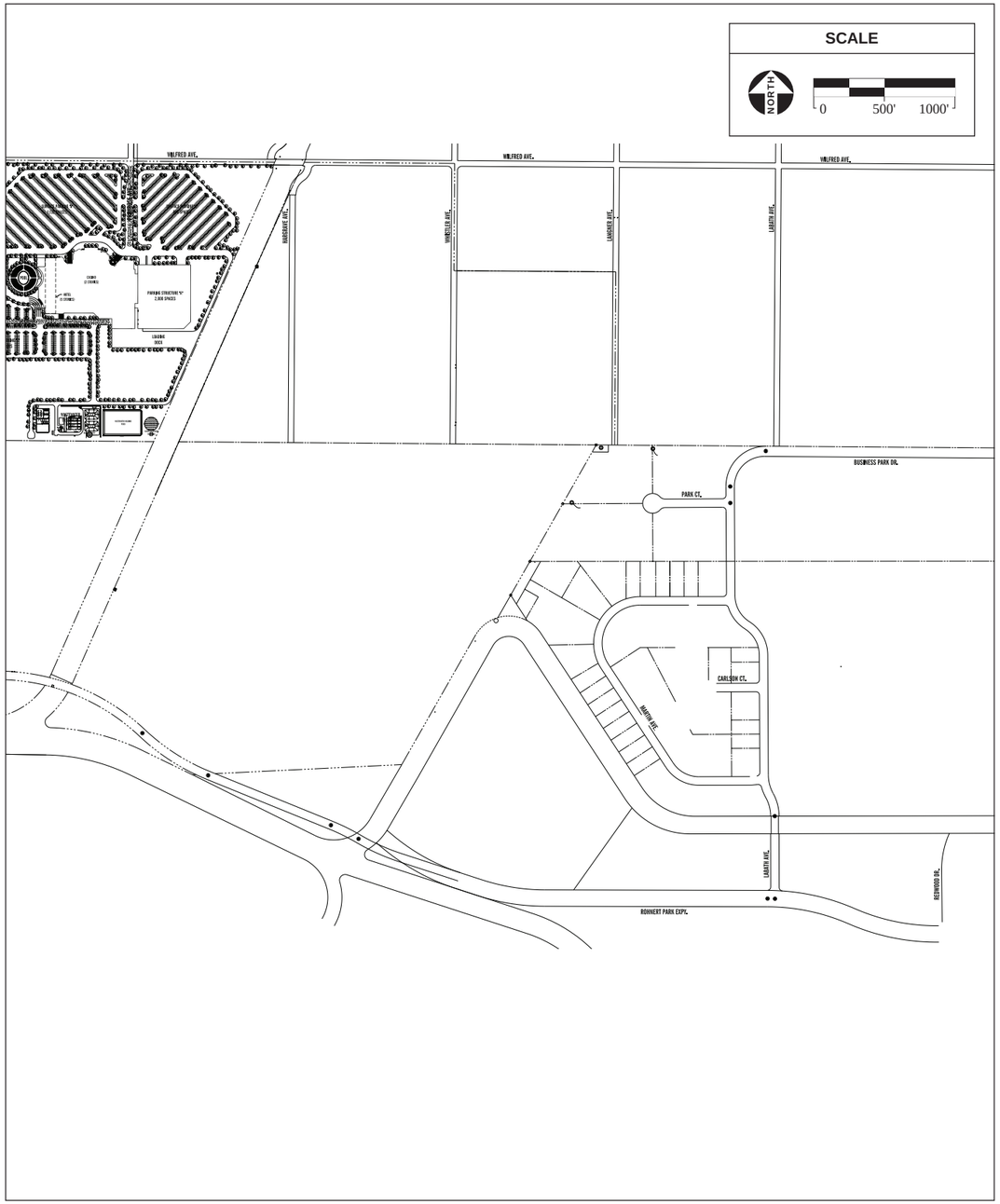
Alternative D consists of a scaled-down version of Alternative B. The casino-hotel resort's general location would be the same as in Alternative B; however, project components would differ from those included in Alternative B. The primary differences would be the smaller scale of Alternative D and absence of the spa and some entertainment venues. **Table 2-3** shows the breakdown of proposed uses with associated square footages for the proposed resort. **Figure 2-19** shows the site plan for the proposed resort, including supporting facilities. The Alternative D

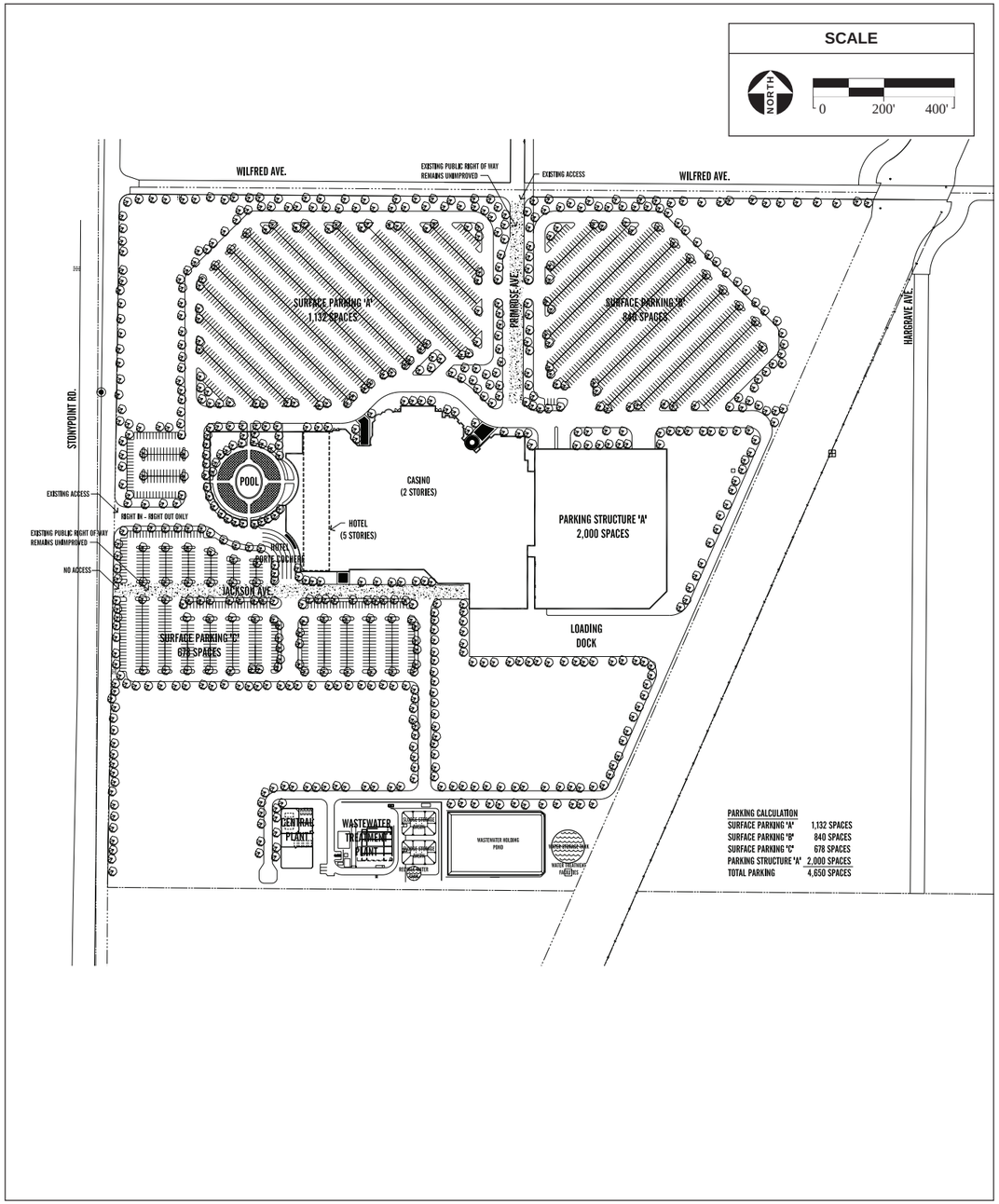
TABLE 2-3
ALTERNATIVES D AND H – REDUCED INTENSITY ALTERNATIVE COMPONENTS

Area	Seats/Rooms/Parking Spaces	Approximate Square Footage
CASINO & ENTERTAINMENT		
Casino		
Casino Gaming		65,000
Casino Circulation		26,000
High Limit Gaming		5,000
Asian Gaming		3,600
Salons (2 total)		4,000
Entry Vestibules (5 total)		2,500
Restrooms (5 total)		6,000
Rewards Center		750
Cage		6,000
Back of House		55,000
Gift Shop		1,000
Food and Beverage		
Buffet	500 seats	23,500
Bars (3 total)		4,500
Service Bars (4 total)		4,000
Lease Restaurants (2 total)	280 seats	12,000
Coffee Shop	225 seats	8,800
Steakhouse	200 seats	10,000
Food Court (6 tenants)	210 seats	12,600
Entertainment		
Lounge		8,000
Banquet		
Banquet/Meeting Space		30,000
Pre-Function/Kitchen/Storage/Office/Support		5,000
Total Casino & Related Square Footage		*293,250*
HOTEL		
Hotel		
Lodging Area	100 rooms (10% suites)	77,000
Lobby/Bar/Back of House		13,750
Sundries		1,000
Pool		
Pool Restrooms		2,600
Pool Concessions		1,500
Pool Grill		3,000
Total Hotel Square Footage		*98,850*
CENTRAL PLANT		*21,300*
Alternative D Total Square Footage		**413,400**
PARKING		
Surface Parking	2,650 parking spaces	
Parking Structure	2,000 parking spaces	
Alternative D Total Parking Spaces	**4,650 parking spaces**	

SOURCE: FRIEDMUTTER GROUP, 2004; AES, 2004.

casino-hotel resort was designed to be profitable as possible while substantially reducing the size and presumably the environmental impacts of the project. The exterior design of the resort would be very similar to that shown in **Figure 2-2**. The resort is expected to employ approximately 2,100 employees. Except for provisions related to revenues, Tribal-State Compact (or Secretarial procedures) requirements are not expected to differ from those of Alternative B. Access to the





SOURCE: Friedmutter Group, 7/22/2004; AES, 2005

Figure 2-19
Alternative D – Site Plan

casino-hotel resort would be gained at existing access points along Wilfred Avenue and Stony Point Road.

2.5.1 MANAGEMENT CONTRACT

As with Alternative B, Alternative D would require NIGC approval of a management contract between the Tribe and SC Sonoma Management or its affiliates before gaming could take place on the northwest corner of the Stony Point site (see **Section 2.2.1**).

2.5.2 CASINO AND RELATED AMENITIES

The two-story casino would consist of a mixture of uses, including: banking and administration facilities, gaming commission offices, a primary gaming area, a high-limit gaming area, and a gift shop. Numerous food and beverage outlets would be located in the facility, including: a buffet, three bars, four service bars, a food court, and a total of four restaurants. The casino would also contain an entertainment lounge and banquet/meeting space. Unlike Alternative B, Alternative D would not contain a nightclub or an events center. A detailed listing of each component is provided in **Table 2-3**.

As with Alternative B, alcohol would be served throughout the casino, including the gaming floor. Accordingly, casino patrons would be required to be 21 years of age or older, and the Tribe would adopt a "Responsible Alcoholic Beverage Policy" that would include, but not be limited to, checking the identification of patrons and refusing service to those who are visibly intoxicated. Smoking would be permitted within the casino facility; however, non-smoking sections would be provided.

2.5.3 HOTEL

Unlike Alternative B, Alternative D does not include a spa area. A detailed listing of each hotel component is contained in **Table 2-3** (above). For Alternative D, the hotel would be downsized to 5 stories and 100 rooms.

2.5.4 PARKING

A total of 4,650 parking spaces would be provided to serve the patrons and employees of the resort and supporting facilities. A parking structure, providing a total of 2,000 parking spaces, would be connected to the eastern elevation of the casino-hotel resort.

2.5.5 CONSTRUCTION

Alternative D would be constructed after the Stony Point Site has been placed into federal trust. Construction duration is estimated at 24 months. As with Alternative B, construction would

involve earthwork; placement of concrete foundations; steel, wood, and concrete structural framing; masonry; electrical and mechanical work; building and site finishing; and paving, among other construction activities. The Tribe would adopt the building standards and BMPs previously stated for Alternative A. A preliminary grading plan can be found in **Appendix C**.

Construction would also entail removal of the barn and associated structures located in the northwest corner of the Stony Point Site (**Figure 2-9**). The barn is described in **Section 2.3.5**.

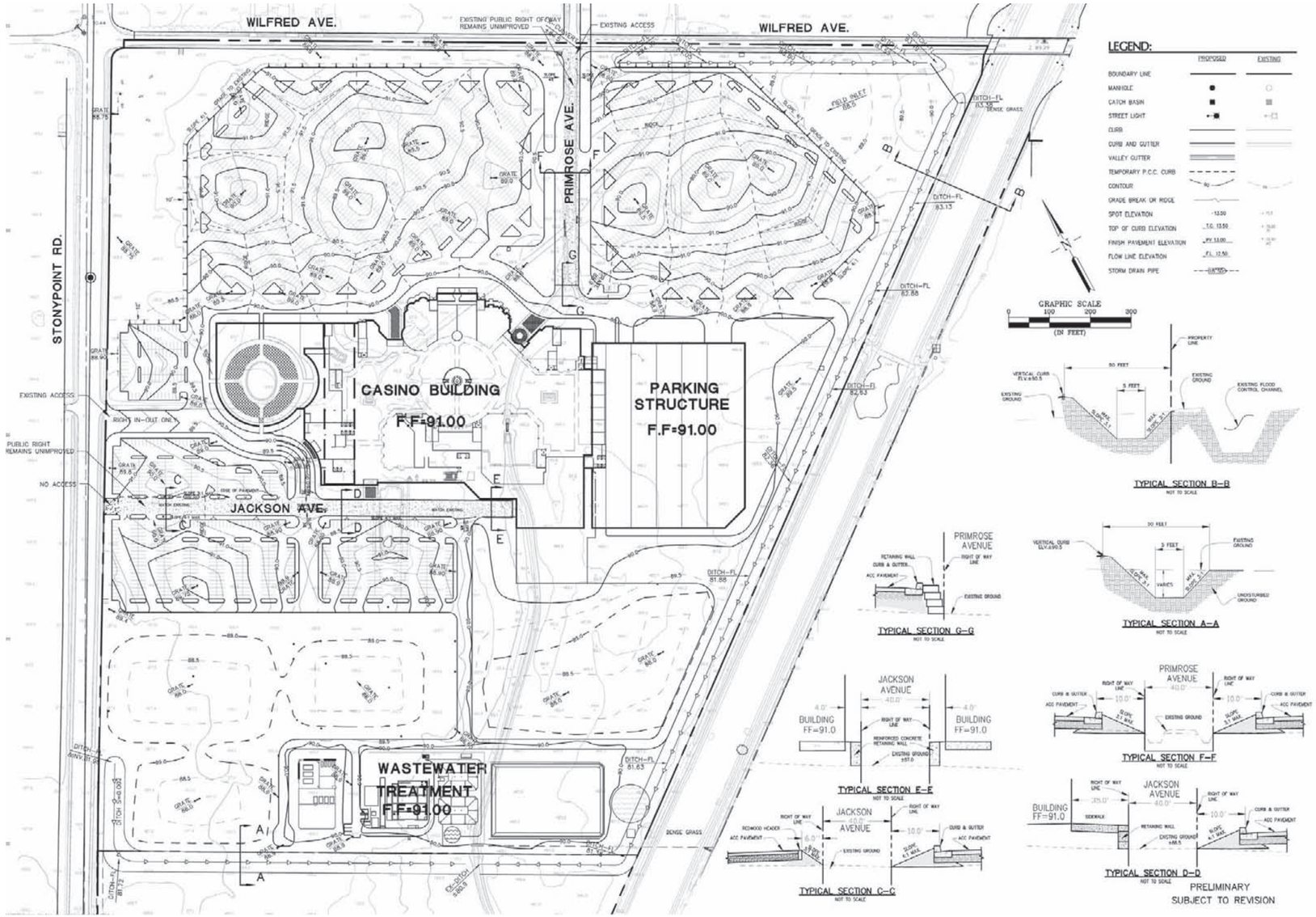
2.5.6 DRAINAGE

Included in **Appendix C**, the preliminary grading and drainage plan for Alternative D incorporates fill to elevate the proposed gaming facility above the 100-year floodplain. All of the proposed facilities would be constructed at least one foot above the 100-year floodplain elevation. Specifically, the buildings would be approximately five feet above the floodplain and the parking lot would be approximately one foot above the floodplain. It is estimated that 150,000 cubic yards of earthwork will be required for Alternative D. On-site excavation from the southern portion of the site would yield the necessary fill material, resulting in a "balanced" site (**Appendix C**).

Runoff from the Northwest Stony Point Site would be conveyed by an underground drainage system to a stormwater detention system, and, after filtration, to the Bellevue-Wilfred Channel, which feeds into Laguna de Santa Rosa (**Figure 2-20**). The drainage plan would be very similar to that proposed for Alternative B and would include the use of several features designed to filter surface runoff prior to release into the natural drainage channels on-site. A stormwater detention system identical to that planned for Alternative B would be provided on-site to account for the increase in runoff created by increased impervious surfaces, encroachment of fill into the floodplain, and the potential treated wastewater discharge into the Bellevue-Wilfred Channel (**Figure 2-11**).

2.5.7 WASTEWATER TREATMENT AND DISPOSAL

Wastewater treatment and disposal for Alternative D would be provided by one of two on-site options. The wastewater treatment facility planned for Alternative D would be the same as that proposed for Alternative A, except that it would be designed for lower flows consistent with Alternative D's reduced intensity program. Based on the wastewater generation rates identified in **Appendix D**, Alternative D would require the capability to treat and/or convey the project's maximum weekend demand of approximately 227,000 gpd. The wastewater treatment plant would be designed with a capacity of 275,000 gpd to accommodate to accommodate variations in diurnal flows. It would also be designed to comply with standards established by the USEPA (see **Section 2.2.7**). The location of the wastewater treatment facility is presented in **Figures 2-21** and **2-22.** A detailed description of the wastewater treatment facility is presented in **Appendix**



SOURCE: Robert A. Korn & Associates, 2004; AES, 2005

Figure 2-20
Alternative D – Grading/Drainage Plan

D. As discussed in **Appendix D**, the elements of the wastewater treatment and disposal facility include a wastewater treatment plant, wastewater piping, landscape irrigation, surface disposal, and recycled water reservoir. Refer to **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation. The required volume of equalization for Alternative D is expected to be around 45,000 gallons, with a 15percent factor of safety. As shown in **Table 2-2**, Wastewater disposal would take place by one of the following two options.

OPTION 1

Presented in **Figure 2-21**, the first option assumes all effluent will be disposed of through sprayfields in the northeast quadrant of the Stony Point Site from April to October, but water produced during the wet season will be disposed of in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel. Treated wastewater would flow within existing drainage channels and through an existing 54-inch culvert on the west side of the Bellevue-Wilfred Channel.

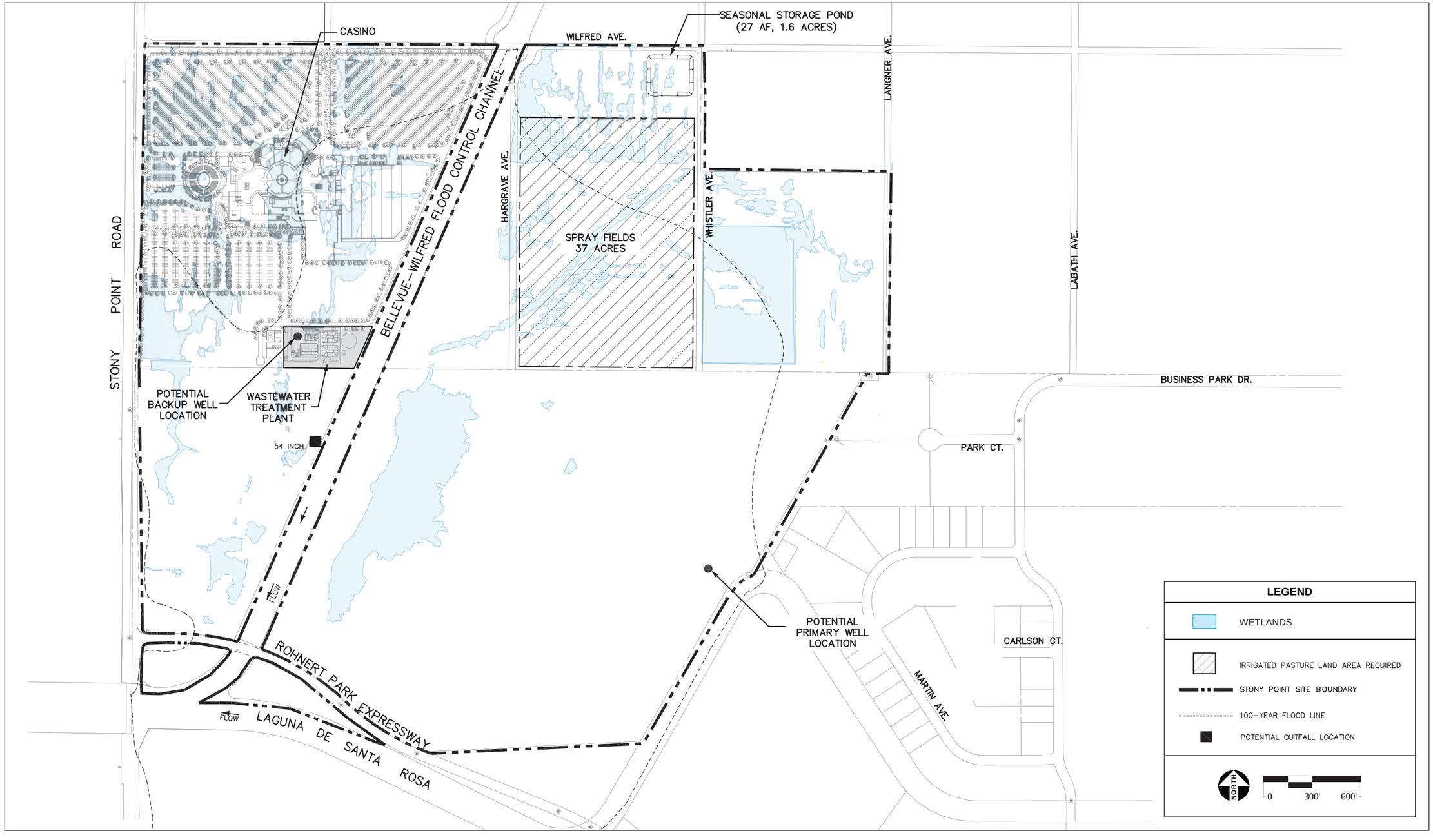
OPTION 2

Presented in **Figure 2-22**, the second option assumes all effluent will be disposed of through sprayfields of increased acreage in the northeast and southeast quadrants of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year.

2.5.8 WATER SUPPLY

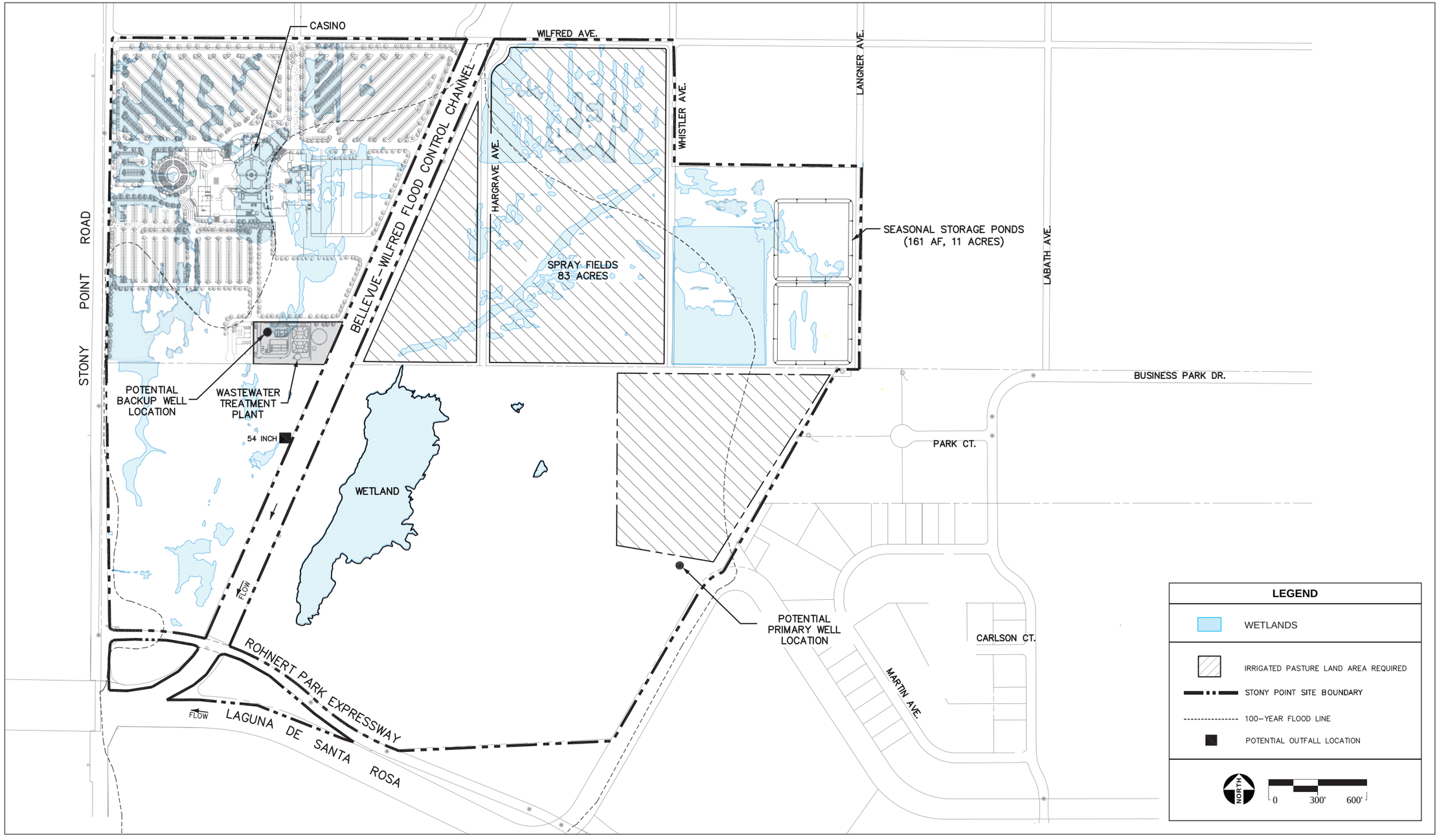
As with Alternative A, water for domestic use, emergency supply, and fire protection would be provided by on-site wells. Elements of the proposed on-site water facilities include two on-site wells, an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system.

As proposed under Alternative A, recycled water would be utilized for Alternative D. According to the Water and Wastewater Feasibility Study (**Appendix D**), the estimated average water demand is 115 gpm. Peak water demand (typically occurring on weekends) is estimated at 145 gpm. Water supply projections are based on average wastewater flows and include a 15 percent allowance for system losses and a 20 percent reduction based on utilization of recycled water. The minimum water supply requirement for a project well is 125 gpm, nonetheless HydroScience recommends sizing wells to 150 gpm for an added degree of safety to account for unusually high peak demands. Two wells (for redundancy) with a firm water supply capacity of 150 gpm each would be constructed on the Stony Point Site. The wells are expected to alternate in use based on water supply requirements in order to equalize run times for equipment located on each well and to maintain to viability of each well. The approximate depth of the wells would be 650 feet and screening would occur between 200 and 650 feet below the surface. The existing on-site wells would be abandoned. Water tank capacity would be based on fire flow requirements developed



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-21
Alternative D – Water / Wastewater Facilities (Option 1)



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-22
Alternative D – Water / Wastewater Facilities (Option 2)

after review by local fire authorities. The estimated capacity would be approximately 1.2 million gallons and in a welded steel tank designed to meet American Water Works Association (AWWA) specifications (**Appendix D**). A potable water pump station with two water pumps would convey water from the storage tank to facilities requiring potable water. The potable water main for the Stony Point Site would be sized for the peak day demand.

The water system would be dual plumbed for use of recycled water for such uses as landscape irrigation, toilet flushing, and cooling towers. Water conservation measures would be the same as described above under Alternative A.

2.5.9 FUEL STORAGE

Fuel storage requirements would be similar, although reduced in size, when compared with those proposed in **Section 2.3.9** for Alternative B. Fuel storage practices would be the same as those proposed for Alternative B.

2.5.10 MEMORANDA OF UNDERSTANDING

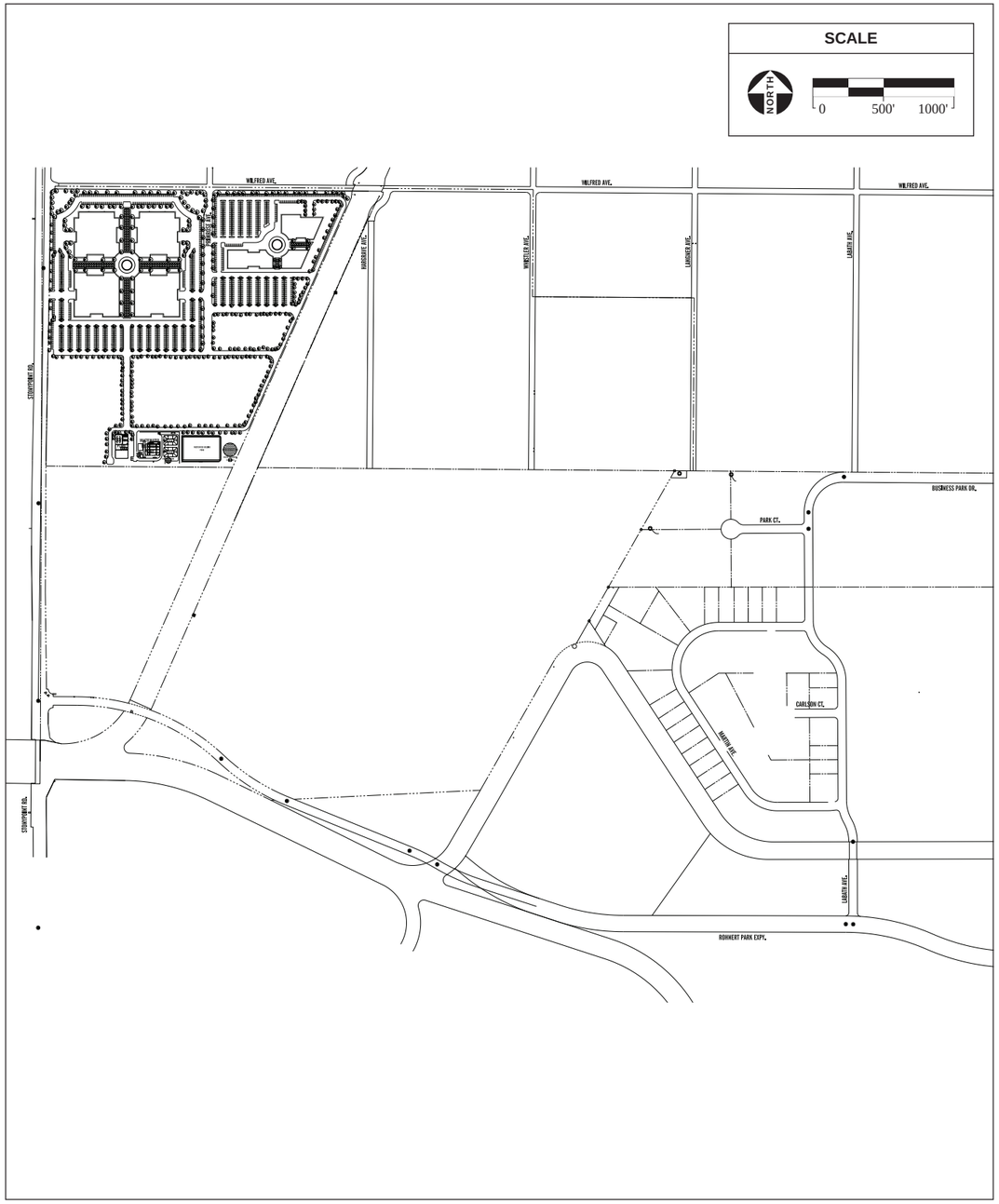
Given the reduced size and scope of the casino-hotel resort proposed for Alternative D, the terms of the MOUs with the City (the City MOU would apply, but the Tribe would likely assert the right to renegotiate certain terms) and County are not expected to apply to Alternative D. The agreements can be amended, however, to account for the reduced intensity of development.

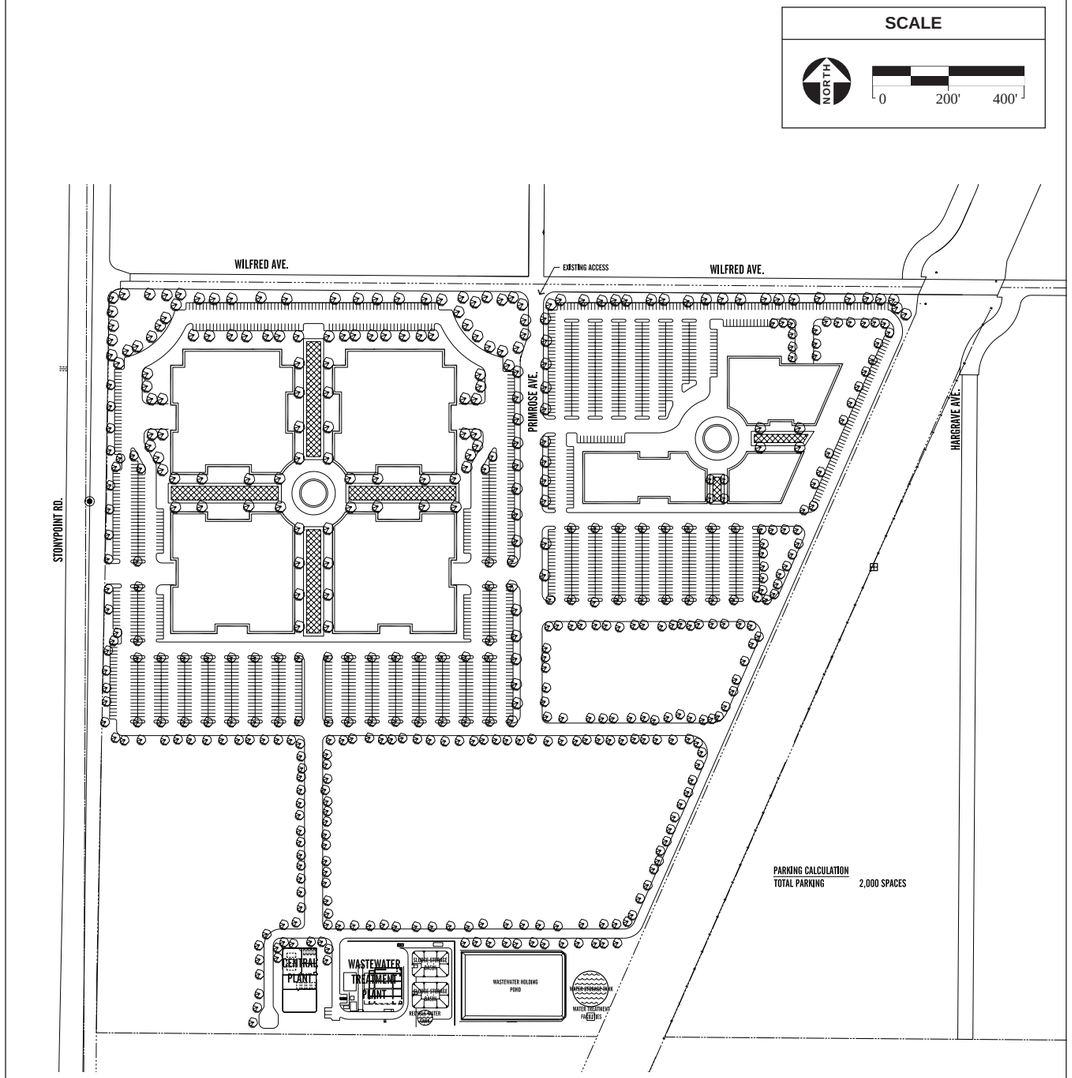
2.6 ALTERNATIVE E – BUSINESS PARK

Alternative E consists of the development of an approximately 500,000-square-foot business park on the northwest corner of the Stony Point Site. **Figure 2-23** shows the site plan for Alternative E. Under this alternative the NIGC would not approve a management contract between the Tribe and SC Sonoma Management and the Tribe would likely need to seek another source of development funding as SC Sonoma Management and its affiliates are not expected to support a development not related to a gaming operation. A Tribal-State Compact would not be needed for Alternative E. Although land would not need to be taken into trust in order to operate a business park, it is assumed that the Tribe would seek to have the Stony Point site taken into trust under Alternative E in order to establish a land base. The Alternative E development was designed to be somewhat consistent with nearby uses and as profitable as possible within the context of providing an alternative use for analysis as part of a range of reasonable alternatives.

2.6.1 BUSINESS PARK

The business park proposed under this alternative would consist of approximately 400,000 square feet of light industrial uses and 100,000 square feet of commercial uses. The business park space





SOURCE: Friedmutter Group, 7/22/2004; AES, 2005

Figure 2-23
Alternative E – Site Plan

would be leased to various tenants at the discretion of the Tribe. An architectural rendition of the business park is provided in **Figure 2-24**. **Table 2-4** details the square footage of each project component.

The development of the business park would occur on the northwest corner of the Stony Point Site. The remainder of the Stony Point Site would remain undeveloped and be used for open space, pasture, biological habitat, and recycled water sprayfields. Access to the business park would be gained at existing access points along Wilfred Avenue and Stony Point Road.

TABLE 2-4
ALTERNATIVE E – BUSINESS PARK ALTERNATIVE COMPONENTS

Area	Seats/Rooms/Parking Spaces	Approximate Square Footage
BUSINESS PARK		
Light Industrial Businesses		400,000
Commercial Businesses		100,000
Alternative E Total Square Footage		**500,000**
PARKING		
Surface Parking	2,000 parking spaces	
Alternative E Total Parking Spaces	**2,000 parking spaces**	

SOURCE: AES, 2004.

2.6.2 PARKING

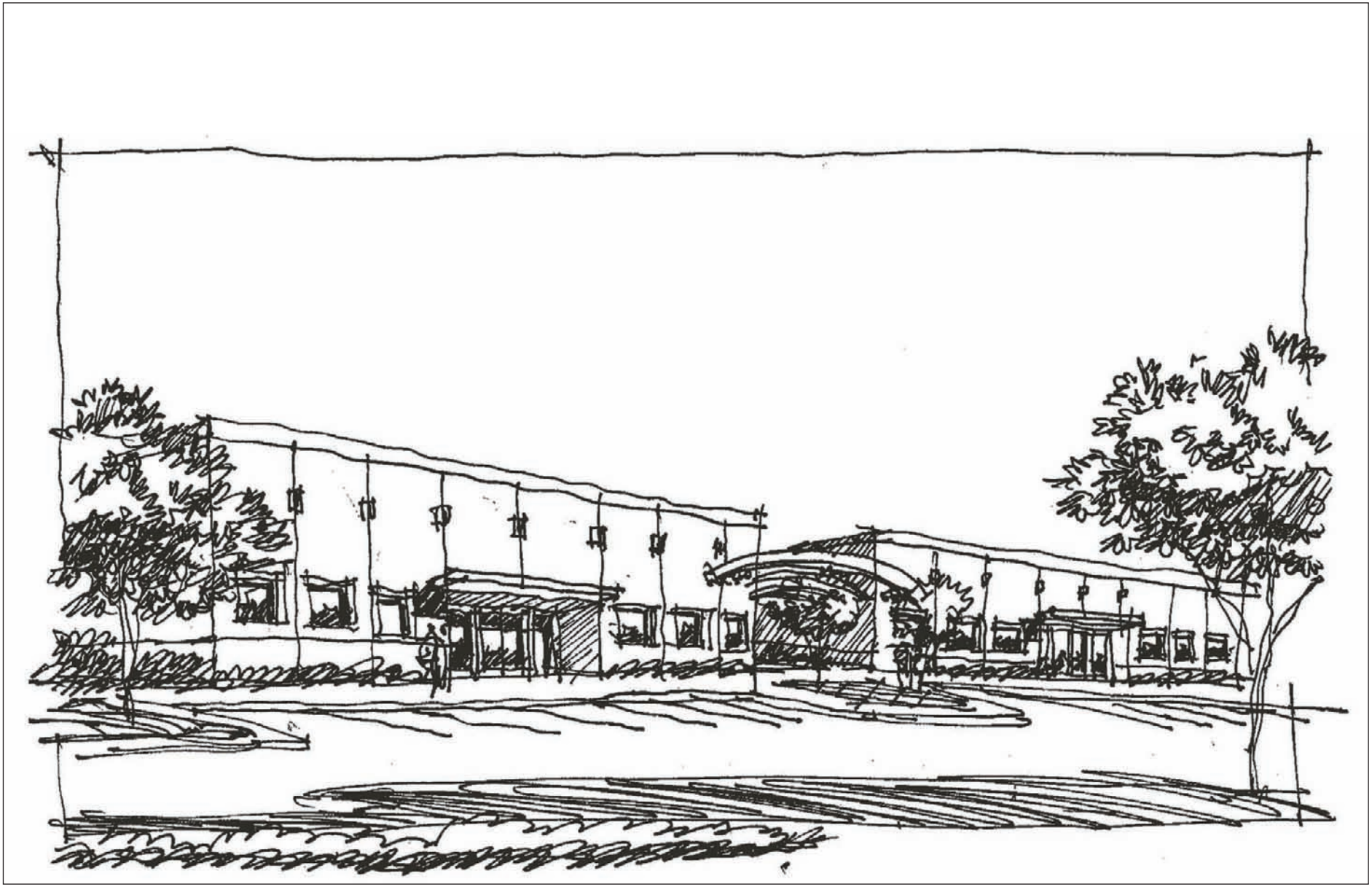
A total of 2,000 surface parking spaces is planned to serve both employees and visitors.

2.6.3 CONSTRUCTION

Construction duration is estimated at 20 months. Construction would also entail removal of the barn and associated structures located in the northwest corner of the Stony Point Site (**Figure 2-9**). The barn is described in **Section 2.3.5**.

2.6.4 DRAINAGE

Included in **Appendix C**, the preliminary grading and drainage plan for Alternative E incorporates fill to elevate the proposed business park above the 100-year floodplain. All of the proposed facilities would be constructed at least one foot above the 100-year floodplain elevation. Specifically, the buildings would be approximately five feet above the floodplain and the parking lot would be approximately one foot above the floodplain. It is estimated that 150,000 cubic yards of earthwork will be required for Alternative E. On-site excavation from the southern portion of the site would yield the necessary fill material, resulting in a "balanced" site (**Appendix C**).



SOURCE: Friedmutter, 2004; AES, 2005

Figure 2-24
Alternative E – Architectural Rendition

Runoff from the site would be conveyed by an underground drainage system to a stormwater detention system, and, after filtration, to the Bellevue-Wilfred Channel, which feeds into Laguna de Santa Rosa (**Figure 2-25**). The drainage plan would be very similar to that proposed for Alternative B and would include the use of several features designed to filter surface runoff prior to release into the natural drainage channels on-site. A stormwater detention system similar to that planned for Alternative B would be provided on-site to account for the increase in runoff created by increased impervious surfaces, encroachment of fill into the floodplain, and the potential treated wastewater discharge into the Bellevue-Wilfred Channel (**Figure 2-25**).

2.6.5 WASTEWATER TREATMENT AND DISPOSAL

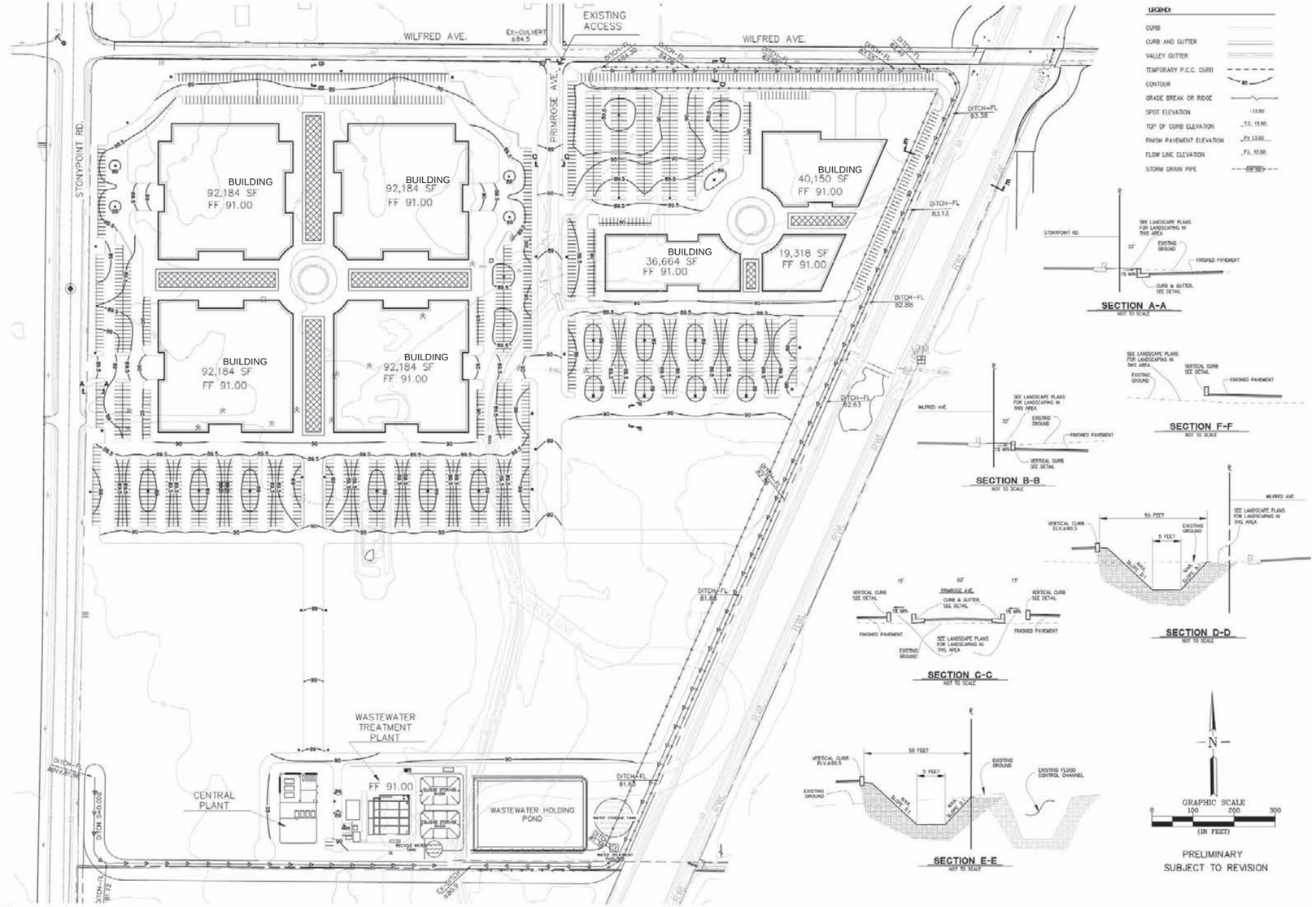
The wastewater treatment facility planned for Alternative E would be designed for lower flows consistent with Alternative E's reduced needs. Based on the wastewater generation rates identified in **Appendix D**, Alternative E would require the capability to treat and/or convey the project's maximum weekday demand of approximately 78,000 gpd. The wastewater treatment plant would be designed with a capacity of 90,000 gpd to accommodate variations in diurnal flows. It would also be designed to comply with standards established by the USEPA (see **Section 2.2.7**). The location of the wastewater treatment facility is presented in **Figures 2-26** and **2-27**. A detailed description of the wastewater treatment facility is presented in **Appendix D**. As discussed in **Appendix D**, the elements of the wastewater treatment and disposal facility include a wastewater treatment plant, wastewater piping, landscape irrigation, surface disposal, and recycled water reservoir. See **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation. The required volume of equalization for Alternative E is expected to be around 20,000 gallons, with a 15percent factor of safety. As shown in **Table 2-2**, wastewater disposal would take place by one of the following two options.

OPTION 1

Presented in **Figure 2-26**, the first option assumes all effluent will be disposed of through sprayfields in the northeast quadrant of the Stony Point Site from April to October, but water produced during the wet season will be disposed of in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel. Treated wastewater will flow within existing drainage channels and through an existing 54-inch culvert on the west side of the Bellevue-Wilfred Channel.

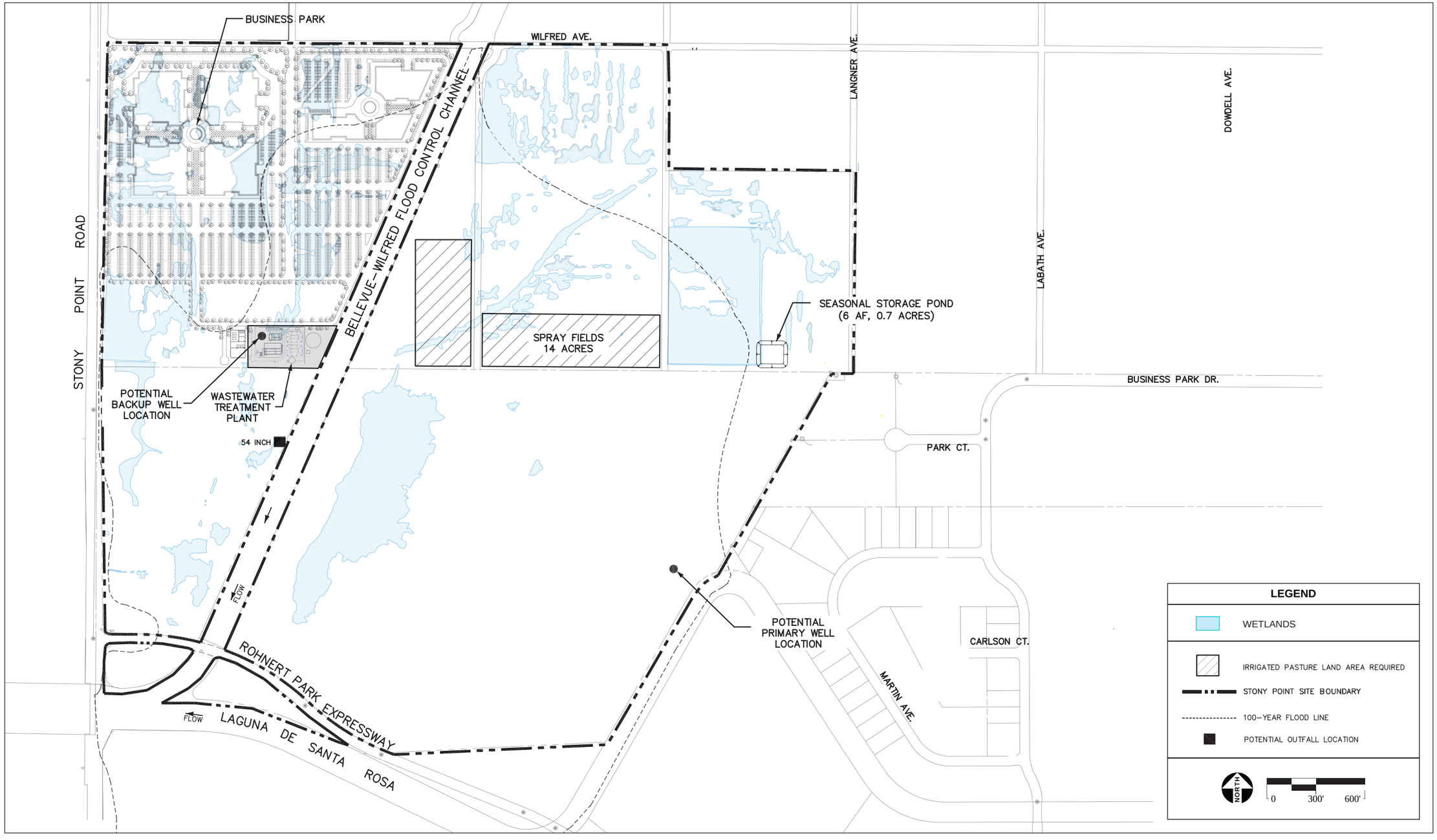
OPTION 2

Presented in **Figure 2-27**, the second option assumes all effluent will be disposed of through sprayfields of increased acreage in the northeast quadrant of the Stony Point Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year.



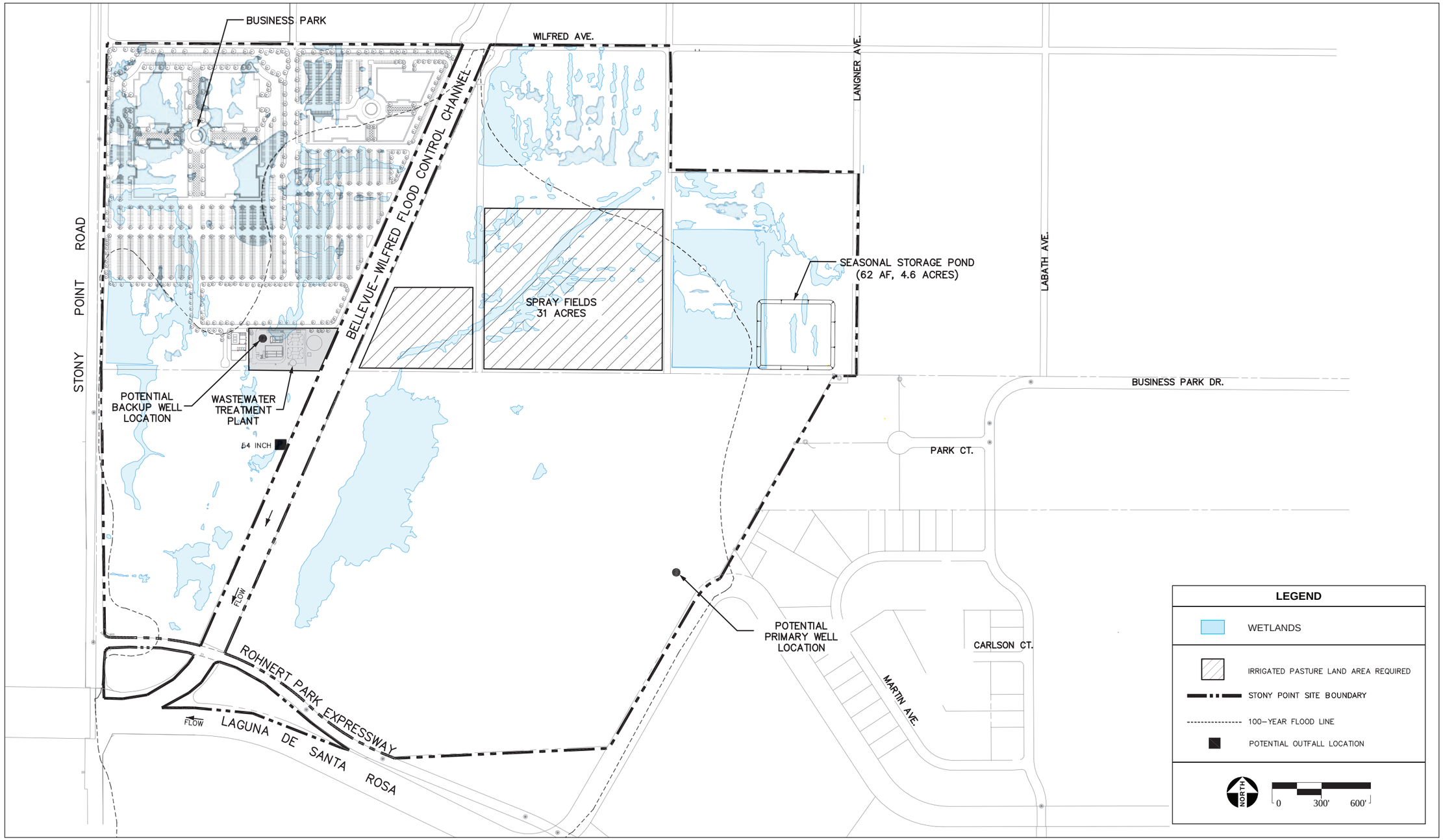
SOURCE: Robert A. Korn & Associates, 2004; AES, 2005

Figure 2-25
Alternative E – Grading/Drainage Plan



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-26
Alternative E – Water / Wastewater Facilities (Option 1)



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-27
Alternative E – Water / Wastewater Facilities (Option 2)

2.6.6 WATER SUPPLY

As with Alternative A, water for domestic use, emergency supply, and fire protection would be provided by on-site wells. Elements of the proposed on-site water facilities include two on-site wells, an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system.

As with Alternative A, recycled water would be utilized for Alternative E. According to the Water and Wastewater Feasibility Study (**Appendix D**), the estimated average water demand is 43 gpm. Peak water demand (typically occurring on weekends) is estimated at 50 gpm. Water supply projections are based on average wastewater flows and include a 15 percent allowance for system losses and a 20 percent reduction based on utilization of recycled water. The minimum water supply requirement for a project well is 50 gpm, nonetheless HydroScience Engineers Inc. recommends sizing wells to 65 gpm for an added degree of safety to account for unusually high peak demands. Two wells (for redundancy) with a firm water supply capacity of 65 gpm each would be constructed on the Stony Point Site. The wells are expected to alternate in use based on water supply requirements in order to equalize run times for equipment located on each well and to maintain to viability of each well. The approximate depth of the wells would be 650 feet and screening would occur between 200 and 650 feet below the surface. The existing on-site wells would be abandoned. Water tank capacity would be based on fire flow requirements developed after review by local fire authorities. The estimated capacity would be approximately 1.2 million gallons and contained within a welded steel tank designed to meet American Water Works Association (AWWA) specifications (**Appendix D**). A potable water pump station with two water pumps would convey water from the storage tank to facilities requiring potable water. The potable water main for the Stony Point Site would be sized for the peak day demand.

The water system would be dual plumbed for use of recycled water for such uses as landscape irrigation, toilet flushing, and cooling towers. Water conservation measures would be the same as described above under Alternative A (except for those that are specific to a hotel or casino development).

2.6.7 FUEL STORAGE

Fuel storage requirements would be similar, although reduced in size, when compared to those proposed in **Section 2.3.9** for Alternative B. Fuel storage practices would be the same as those proposed for Alternative B.

2.6.8 MEMORANDA OF UNDERSTANDING

Given that Alternative E does not have a gaming component and would therefore produce much lower revenues, the terms of the MOUs with the City (the City MOU would apply, but the Tribe

would likely assert the right to renegotiate certain terms) and County would not apply to Alternative E. The MOUs can be amended, however, to account for the shift in purpose of the development. The Tribal Labor Agreements identified under Alternative A, would not apply to

2.7 ALTERNATIVE F – LAKEVILLE CASINO

Alternative F consists of the development of a casino-hotel resort at an alternative off-site location. Under Alternative F, the resort would be located in southern Sonoma County near the intersection of Lakeville Highway and SR-37 (see **Figure 1-1**). The casino and hotel would be developed just west of Lakeville Highway on approximately 79 acres in the central portion of the approximately 322-acre Lakeville Site (**Figure 2-28**). The remainder of the Lakeville Site would remain undeveloped and be used for open space, pasture, biological habitat, and recycled water sprayfields. The components of the resort would be identical to those proposed for Alternative A (see **Table 2-1**). The design of the resort would be very similar to that shown in **Figure 2-2**, with minor differences in the configuration of project components to conform to site boundaries and topography. Employment and Tribal-State Compact (or Secretarial procedures) provisions would not differ from those of Alternative A. Access to the casino-hotel resort would be gained at existing access points along Lakeville Highway.

2.7.1 MANAGEMENT CONTRACT

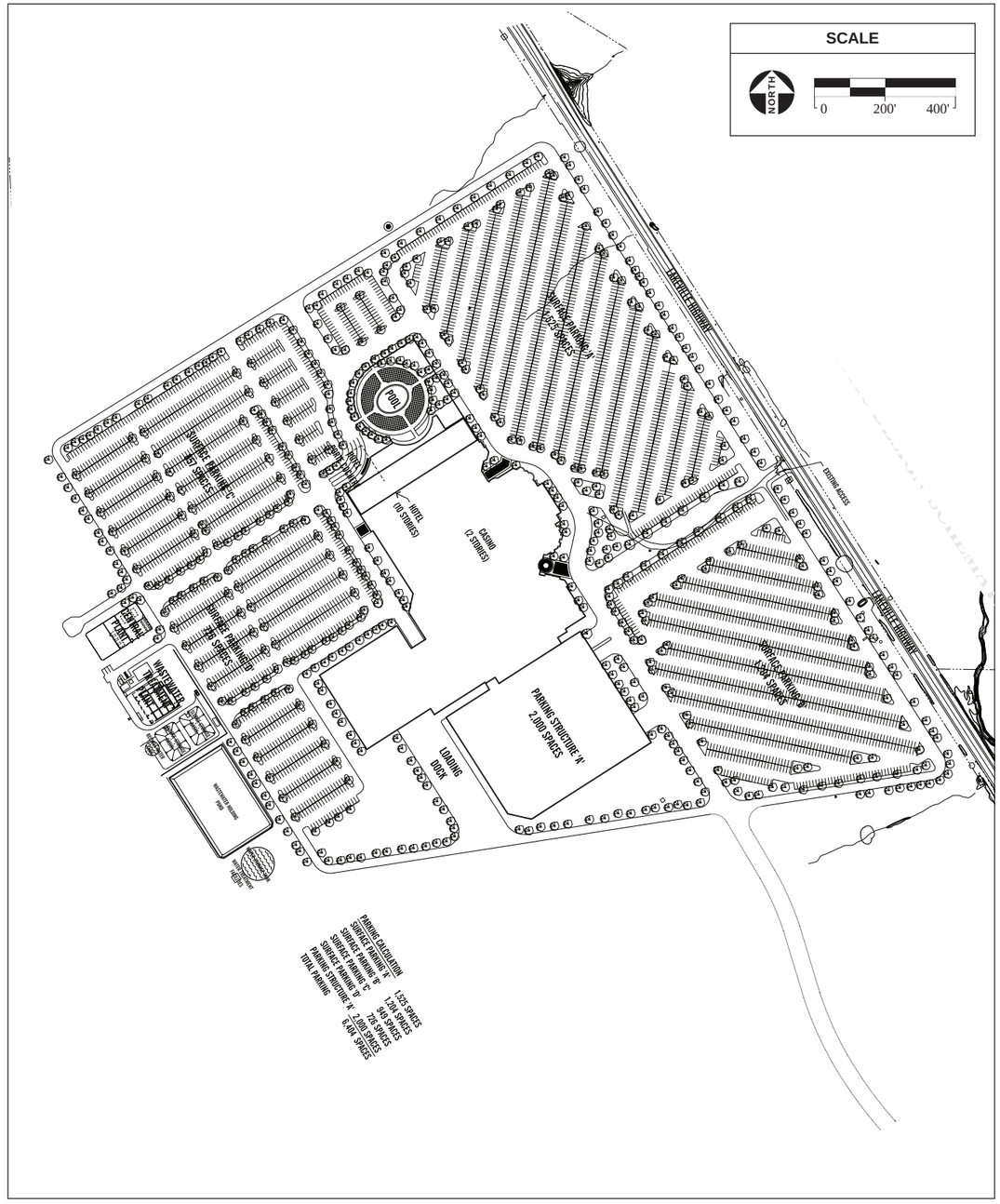
As with Alternative A, under Alternative F the NIGC would need to approve a management contract between the Tribe and SC Sonoma Management or its affiliates before gaming could take place on the Lakeville Site (see **Section 2.2.1**).

2.7.2 CASINO AND RELATED AMENITIES

The design and components of the casino facility would be nearly identical to those of Alternative A (see **Section 2.2.2** and **Table 2-1**). As with Alternative A, alcohol would be served throughout the casino, including the gaming floor. Accordingly, casino patrons would be required to be 21 years of age or older, and the Tribe would adopt a "Responsible Alcoholic Beverage Policy" that would include, but not be limited to, checking the identification of patrons and refusing service to those who are visibly intoxicated. Smoking would be permitted within the casino facility; however, non-smoking sections would be provided.

2.7.3 HOTEL AND SPA

The design and components of the hotel and spa would be nearly identical to those of Alternative A (see **Section 2.2.3** and **Table 2-1**).



SOURCE: Friedmutter Group, 7/22/2004; AES, 2005

Figure 2-28
Alternative F – Site Plan

Alternative E, as the agreements include provisions related to the construction and operation of the proposed development of a casino and hotel on the Wilfred, Stony Point, and Lakeville sites.

2.7.4 PARKING

A total of approximately 6,102 parking spaces would be provided to serve the patrons and employees of the resort and supporting facilities. A parking structure, providing a total of 2,000 parking spaces, would be connected to the southeastern elevation of the casino-hotel resort.

2.7.5 CONSTRUCTION

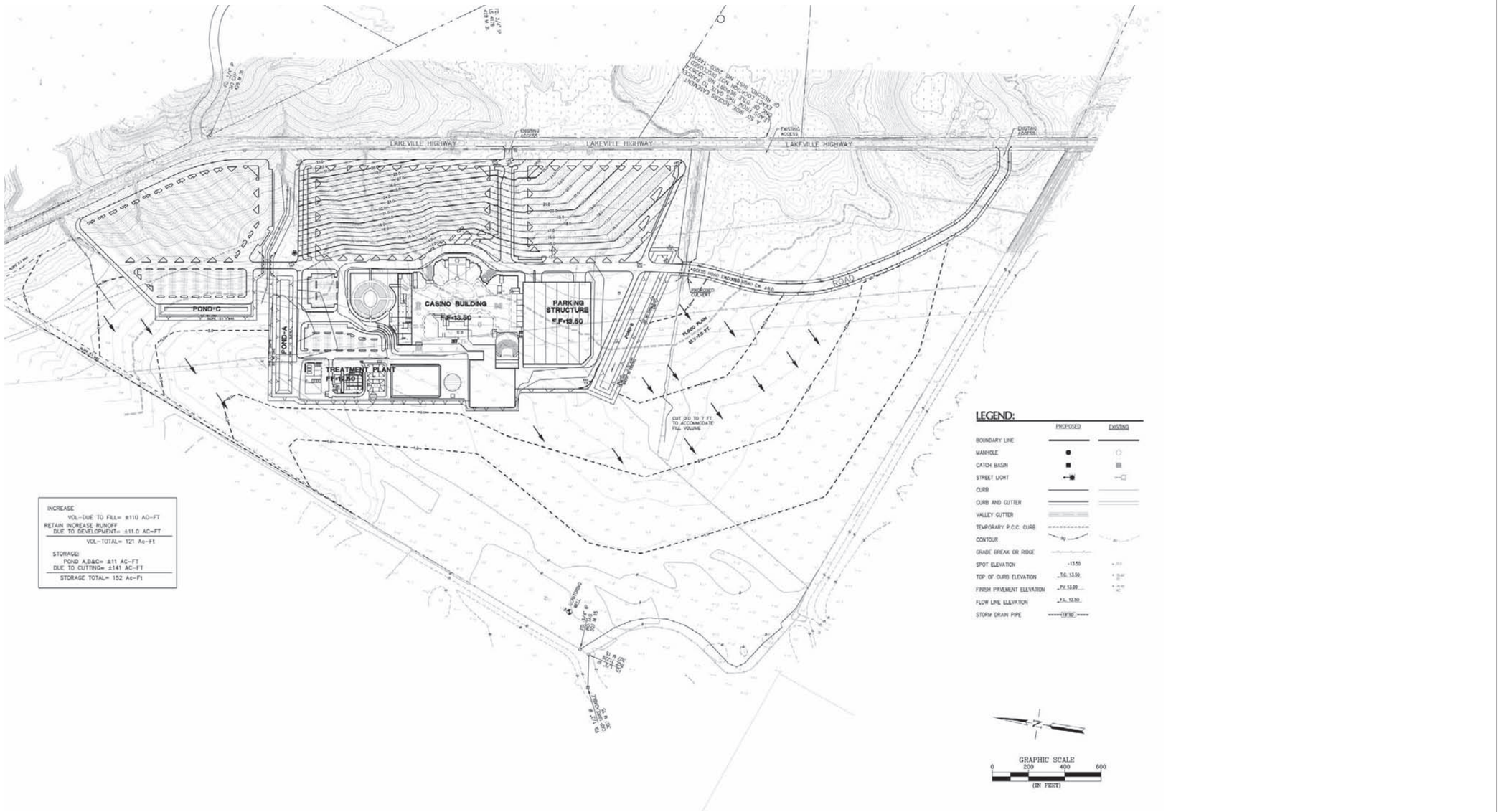
Alternative F would be constructed after the Lakeville Site has been placed into federal trust. Construction duration is estimated at 27 months. As with Alternative A, construction would involve earthwork; placement of concrete foundations; steel, wood, and concrete structural framing; masonry; electrical and mechanical work; building and site finishing; and paving, among other construction activities. The Tribe would adopt the building standards and BMPs stated for Alternative A. A preliminary grading plan can be found in **Appendix C**.

2.7.6 DRAINAGE

Included in **Appendix C**, the preliminary grading and drainage plan for Alternative F incorporates fill to elevate the proposed gaming facility above the 100-year floodplain. All of the proposed facilities would be constructed at least one foot above the 100-year floodplain elevation. Specifically, the buildings would be approximately five feet above the floodplain and the parking lot would be approximately one foot above the floodplain. It is estimated that 404,000 cubic yards of earthwork will be required for Alternative F. On-site excavation adjacent to the development area would yield approximately 338,000 cubic yards of fill material. Approximately 66,000 cubic yards of fill material would be imported from off-site.

Runoff from the Lakeville Site would be conveyed by an underground drainage system to stormwater detention basins, and ultimately to drains flowing southwesterly through the site (**Figure 2-29**). The drainage plan includes the use of several features designed to filter the surface runoff prior to release into the natural drainage channels on-site and, ultimately, into the Petaluma River. Runoff from the Lakeville Site would be directed into storm drainpipes. Inlets would be placed at appropriate intervals along storm drainpipes to capture runoff and convey it to detention basins. Prior to release into the storm drainpipes, runoff would pass through a sediment/grease trap ("Stormceptor"), which would filter suspended solids that could degrade surface water quality.

Detention basins would be provided on-site to reduce increased peak flows that would result from developing the site. These basins would assure that post-development runoff peaks from the



SOURCE: Robert A. Korn & Associates, 2004; AES, 2005

Figure 2-29
Alternative F – Grading/Drainage Plan

Lakeville Site would be equal to the existing conditions. The detention of water on-site would reduce potential downstream erosion and effects to water quality. A total of 152 acre-feet of storage would be provided in the stormwater detention system to compensate for the increase in runoff created by increased impervious surfaces, encroachment of fill into the floodplain, and the potential on-site treated wastewater discharge. A preliminary drainage plan can be found in **Appendix C**.

2.7.7 WASTEWATER TREATMENT AND DISPOSAL

Existing off-site wastewater treatment facilities are too distant to present a feasible option for project wastewater treatment (**Appendix D**). Thus, wastewater treatment and disposal for Alternative F would be provided by one of two on-site options. The wastewater treatment facility planned for Alternative F would not change in size or scope from that proposed for Alternative A and would also be designed to comply with standards established by the USEPA (see **Section 2.2.7**). The location of the WWTP is presented in **Figures 2-30** and **2-31** in addition, a detailed description of the wastewater treatment facility is presented in **Appendix D**. As discussed in **Appendix D**, the elements of the wastewater treatment and disposal facility include a wastewater treatment plant, wastewater piping, landscape irrigation, surface disposal, and recycled water reservoir. See **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation. As shown in **Table 2-2**, wastewater disposal would take place by one of the following two options.

OPTION 1

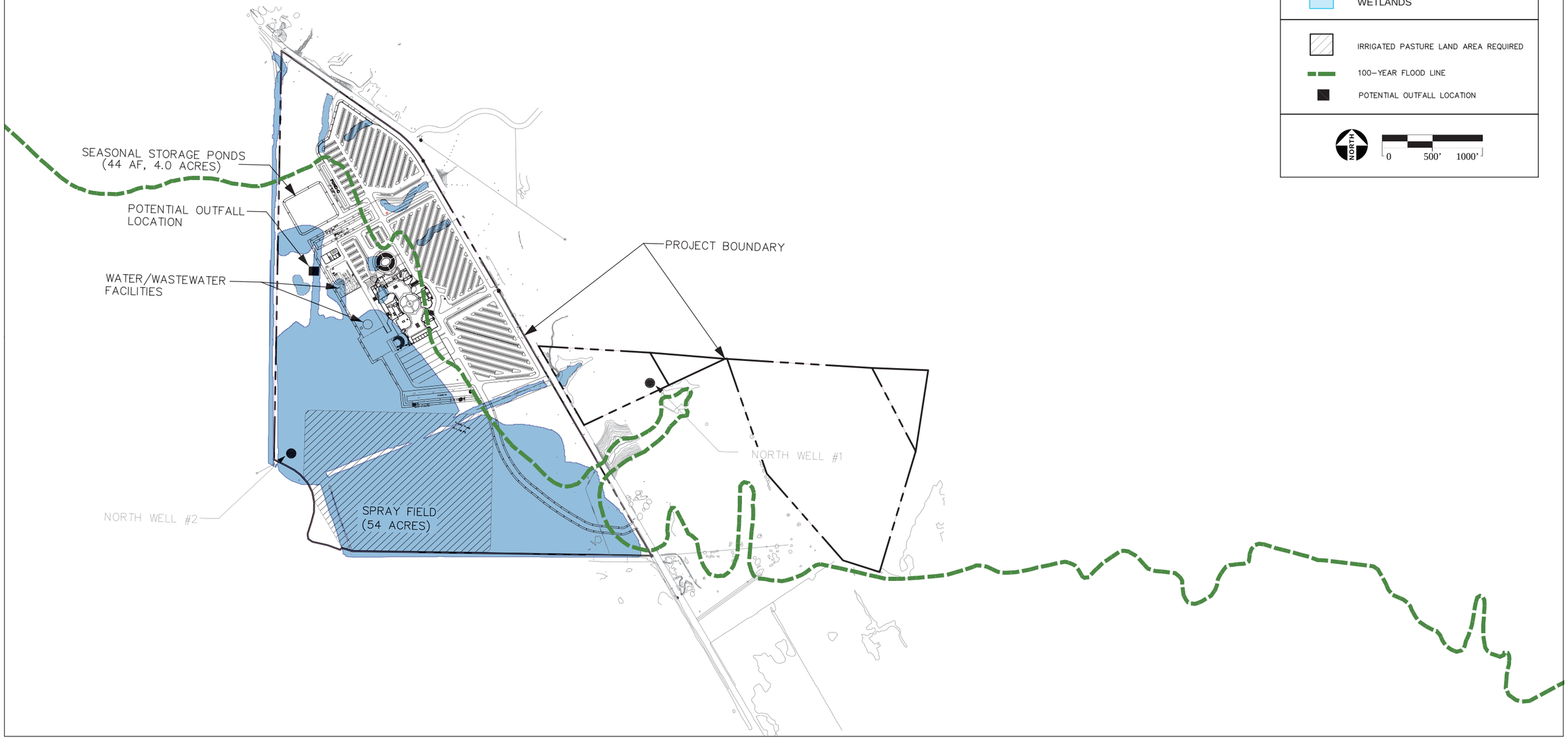
Presented in **Figure 2-30**, the first option assumes all effluent will be disposed of through sprayfields in the southern half of the Lakeville Site from April to October, but water produced during the wet season will be disposed of in an on-site stream tributary to the Petaluma River.

OPTION 2

Presented in **Figure 2-31**, the second option assumes all effluent will be disposed of through sprayfields of increased acreage in the southern and western halves of the Lakeville Site from April to October and stored in an on-site reservoir or wetlands during the remainder of the year.

2.7.8 WATER SUPPLY

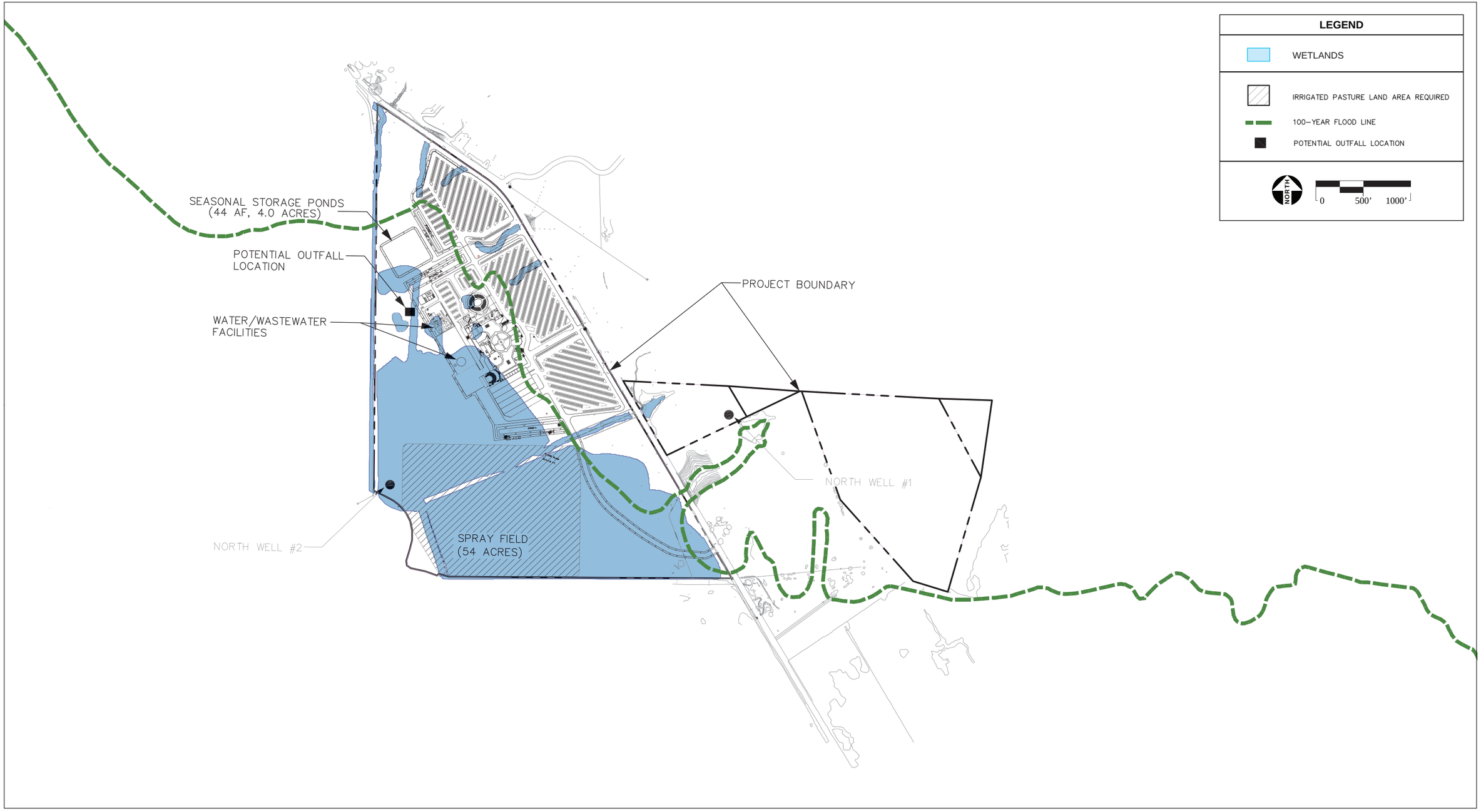
As with Alternative A, water for domestic use, emergency supply, and fire protection would be provided by on-site wells. Elements of the proposed on-site water facilities include two on-site wells, an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system.



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-30

Alternative F – Water / Wastewater Facilities (Option 1)



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-31

Alternative F – Water / Wastewater Facilities (Option 2)

Recycled water would be utilized for landscape irrigation and potentially toilet flushing. The estimated water demands and proposed well and water system design would be the same as Alternative A, except the existing well located in the southwest corner of the Lakeville site would likely be utilized for water supply purposes (unlike Alternative A, which would not reuse any existing on-site wells). The proposed Alternative A water conservation measures would also apply to Alternative F.

2.7.9 FUEL STORAGE

Fuel storage requirements and practices would be the same as those proposed in **Section 2.2.9** for Alternative A.

2.7.10 MEMORANDA OF UNDERSTANDING

Given the different location of the casino-hotel resort proposed for Alternative F, the MOU with the City of Rohnert Park would not apply to Alternative F. According to the Sonoma County MOU, the MOU may apply to properties other than the Stony Point Site with the concurrence of the County.

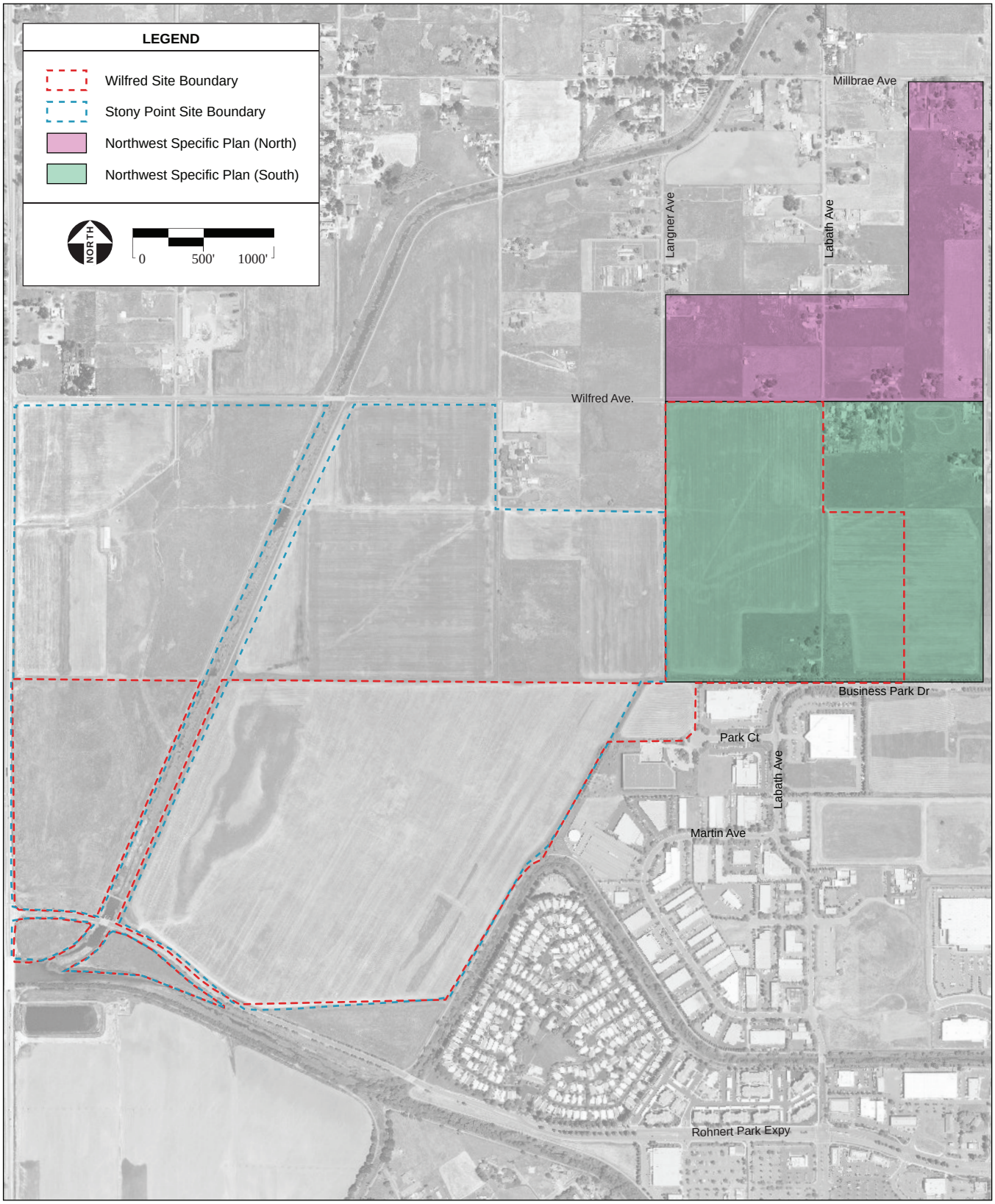
2.8 ALTERNATIVE G – NO ACTION

Under the No Action Alternative, a management contract would not be approved, and the land would not be taken into trust. Both the Lakeville Site and the Stony Point Site would remain in their current condition. Future development of either site would be guided by existing land use plans, and there are currently no known development plans for either of these locations.

A portion of the Wilfred site however, overlaps with a specific plan recently prepared by the City of Rohnert Park (**Figure 2-32**). In the event that Alternative A is not developed, the area of overlap would likely be subject to the program of development set forth in the Northwest Specific Plan Southern Area (Southern Specific Plan). An overview of the various elements of the Southern Specific Plan and its development vision for the area of overlap is presented below.

2.8.1 NORTHWEST SPECIFIC PLAN SOUTHERN AREA

The Northwest Specific Plan (NWSP) was prepared by the City of Rohnert Park in 2004 as an extension of the General Plan. The NWSP was designed for planned build-out of the area to be consistent with and responsive to the community and the vision of the General Plan. Elements of the NWSP include Land Use, Circulation, Public Services, Design Guidelines, and Implementation. Build-out of the NWSP would require annexation of the area into the City of Rohnert Park within the City's sphere of influence.



SOURCE: GlobeXplorer Aerial Photograph, 4/1/2007; City of Rohnert Park, 2004; AES, 2008

Figure 2-32
Northwest Specific Plan - Location Map

LAND USE

The Land Use Element of the Southern Specific Plan promotes a development pattern and allocation of land uses consisting of High Density Residential, Commercial, Industrial, and Park. **Table 2-5** identifies development entitlements for the entire area covered by the Southern Specific Plan. Development would be distributed across the Southern Specific Plan area as shown in **Figure 2-33**. Construction duration is estimated at 24-months after annexation of the area by the City; however, the development may occur in phases and be subject to a longer construction period.

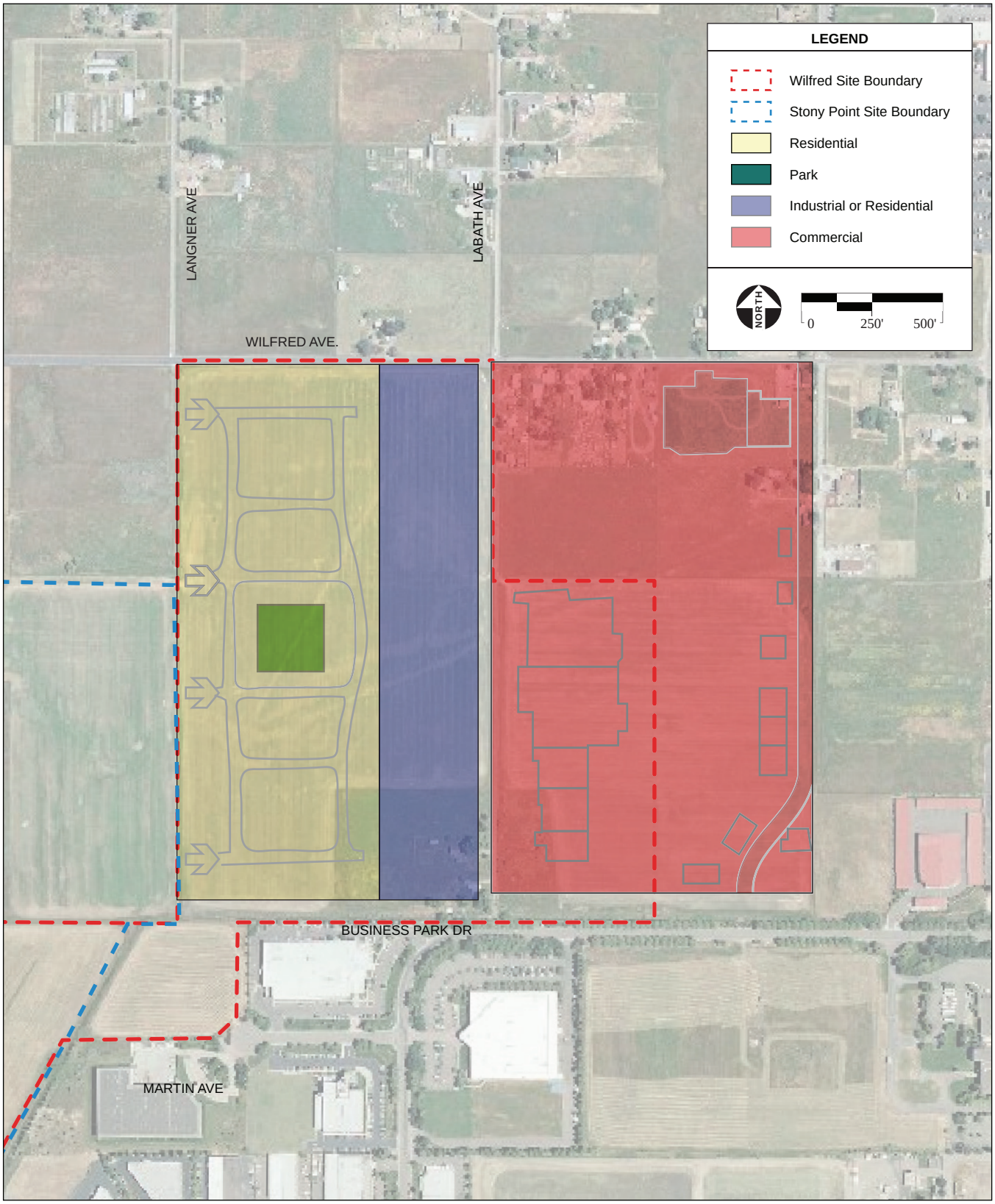
Table 2-6 identifies development entitlements for the area of the Southern Specific Plan that overlaps with the Wilfred Site. According to the Northwest Specific Plan Market Analysis, future demands for residential housing will support the maximum level of residential development allowed by the City's Growth Management Program (Economic Planning Systems Inc, 2004). Accordingly, it is assumed that the portion of the Southern Specific Plan designated as residential or industrial would most likely be developed as residential.

TABLE 2-5
ALTERNATIVE G – NWSP SOUTHERN AREA PLANNED LAND USE PROGRAM

Land Use	Gross Acreage	Units	Building Area (thousand sq. ft.)
High Density Residential	39	450	-
Commercial	50	-	495
Park	2	-	-
If R or I Parcel is Residential	10	45	
If R or I Parcel is Industrial	10	-	(Included in the 495)
Totals	**101**	**495**	**495**

SOURCE: City of Rohnert Park, 2004; AES, 2006.

Residential land use in the Southern Specific Plan area will be at an average density of approximately 12 to 13 units per acre, which is consistent with the City's definition of High Density (12-30 units/acre). This density allows for single-family detached units in residential clusters as well as apartment buildings. Commercial land use area is intended to provide sites for businesses such as retail shopping, food and beverage outlets, service stations, auto sales and repair, lodging, educational services, and social services. It can also accommodate financial, business, or personal services.



SOURCE: GlobeXplorer Aerial Photograph, 4/1/2007; City of Rohnert Park, 2004; AES, 2008

Figure 2-33

Northwest Specific Plan - Southern Area Land Use

TABLE 2-6
ALTERNATIVE G – WILFRED SITE OVERLAP OF NWSP SOUTHERN AREA PLANNED LAND USE PROGRAM

Land Use	Gross Acreage	Units	Building Area (thousand sq. ft.)
High Density Residential	45.69	495	-
Commercial	15.3	-	151
Park	2	-	-
Totals	**62.99**	**495**	**151**

SOURCE: City of Rohnert Park, 2004; AES, 2006.

CIRCULATION

The General Plan includes the following classifications for roadways within the Southern Specific Plan Area: Wilfred Avenue (proposed) will be a Major Arterial comprised of four to six lanes; Dowdell Avenue (proposed) will be a Minor Collector with two lanes; Business Park Drive (existing) will be a Minor Collector with two lanes; and Labath Avenue (proposed) will be a Minor Collector with two lanes. General Plan guidance for Wilfred Avenue, Business Park Drive, and Labath Avenue is adopted by the Southern Specific Plan as adequate for accommodating transportation demands resulting from the build-out of the area. The Southern Specific Plan also recommends specific features, such as left-turn lanes and turn pockets, for various intersections located within the area covered by the plan. Pedestrian and bicycle circulation within the Southern Specific Plan area will be facilitated by a network of sidewalks and bicycle lanes. Market demands will dictate the phasing of development, with roads constructed as necessary and appropriate to provide access to new developments.

DRAINAGE

Stormwater from the Southern Specific Plan area currently is discharged to Hinebaugh Creek. Studies conducted in support of the Storm Drain Master Plan for the City of Rohnert Park have recommended improvement to Labath Creek – widening from 48 to 100 feet and deepening from 5 to 8 feet – to accommodate increased flows from the build-out of the Southern Specific Plan. Storm drains will be incorporated in the improvements to Dowdell, Labath, and Langner Avenues.

WASTEWATER TREATMENT

The City of Santa Rosa has a contractual obligation to meet the wastewater treatment and disposal needs of the City of Rohnert Park and other municipal partners in a subregional wastewater disposal system. Rohnert Park is currently entitled to 3.43 million gallons per day (MGD) of system capacity and is authorized to use a small portion of the City of Santa Rosa's unused entitlement. Rohnert Park currently utilizes 0.48 MGD of the unused entitlement. An incremental recycled

water program is expected to increase Rohnert Park's share of the system capacity to 5.15 MGD, which would meet the estimated full build-out wastewater flow demands forecast in the General Plan.

Rohnert Park has completed construction of an interceptor line to carry effluent from Rohnert Park to the Laguna WWTP which supplements an existing 24-inch diameter line. The Southern Specific Plan calls for construction of gravity sewer mains to convey effluent to Rohnert Park's pumping station and anticipates installation of a new sewer main in Dowdell Avenue where it crosses Business Park Drive south of the existing pumping station.

WATER SUPPLY

The projected average water demand for the area of the Northwest Specific Plan that overlaps the Wilfred Site is 95 gpm. The City of Rohnert Park is supplied with potable water from a well field, with 42 municipal supply wells, and connections to the Sonoma County Water Agency's (SCWA) Petaluma Aqueduct. One of the municipal wells is located adjacent to the Southern Specific Plan area on the south side of Business Park Drive. Assuming that appropriate water conservation measures are implemented, it is estimated that there is sufficient water supply to support build-out of the Southern Specific Plan. However, current storage capacity is only adequate to serve existing development. Build-out of the Southern Specific Plan area would require construction of new storage facilities on-site or expansion of existing SCWA facilities off site.

In 2003, 47 percent of the City's water supply came from imported water supplied by the SCWA (primarily surface water), while 53 percent came from the City's groundwater water supply system. For the near-tern, it is therefore assumed that similar percentages of water would be supplied to the Northwest Specific Plan developments. Thus, approximately 50 gpm of projected Alternative G water demand is expected to come from groundwater and 45 gpm from imported surface water at project opening. Through 2010, the City projects that 26 percent of its water will be from groundwater (Table 4-1, City of Rohnert Park, 2005). Thus, the 95 gpm used by the area of overlap would include approximately 25 gpm from groundwater sources for the foreseeable future.

2.9 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

2.9.1 NON-GAMING ALTERNATIVES

Prior to focusing on gaming as a method to improve the socioeconomic status of the Tribe and to provide employment and services to the Tribal and non-Tribal community (see **Section 1.4**), the Tribe considered various potential non-gaming business opportunities. Specifically, the Tribe considered a vineyard and wine production facility, a food processing facility, and various real estate developments. The Tribe hired a consulting firm to help the Tribe compare the advantages,

disadvantages, and feasibility of each non-gaming alternative. When analyzing alternatives, special consideration was given to regional fit, interest of investors, ability to obtain financing, and comparisons to business opportunities that other tribes have invested in successfully (Federated Indians of Graton Rancheria, 2002a). Ultimately, the following non-gaming alternatives were eliminated from further consideration for the reasons described below and presented in **Table 2-7**.

TABLE 2-7
ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Non-Gaming Alternatives	
	Reasoning for exclusion from consideration:
Vineyard and Wine Production Facility	Profits, return on investment, the ability to obtain working capital, and job creation were all very low.
Food Processing Facility	Profits, job creation and return on investment were low, no current or potential future customer base was identified and no source of startup capital identified.
Premium Outlet Retail Shopping Center	Heavy competition anticipated with three nearby premium outlet retail shopping centers, no source of startup capital identified and the alternative failed to fulfill the needs of improving Tribal socioeconomic status and providing employment opportunities.
Office Complex	Profits and return on investment were very low and no source of startup capital was identified.
Light Industrial Complex	Profits and return on investment were very low and no source of startup capital was identified.
Retirement Community Development	Potentially low job creation and no source of startup capital was identified.
Alternative Sites for Gaming	
	Reasoning for exclusion from consideration:
Cotati Alternative	The site is too small for development of a gaming facility and hotel, the freeway interchange is too small to accommodate increased traffic flows, there was already a housing project underway on the land and the site is located outside of the urban growth boundary of the City of Cotati.
Petaluma North Alternative	A portion of the site is located within the 100-year floodplain, the property has been subdivided and currently has multiple owners, expensive private homes already exist in the area, there is insufficient traffic flow and inadequate access to US-101 and City of Petaluma officials expressed concerns with each of the alternative locations in Petaluma that were considered.
Outlet Mall Alternative	The land footprint is too long and thin for development of a gaming facility and hotel, the site is located within the 100-year floodplain, it has poor access to freeway interchanges, a river runs through the property and wetlands are present, the property has been subdivided and currently has multiple owners, an outlet mall already exists on the property and the City of Petaluma voiced opposition to the project.
Haystack Landing Alternative	The land footprint is too long and thin and the site too small for development of a gaming facility and hotel, existing roadways restrict access, the site is located on bay mud which could potentially cause foundation issues, a railroad track runs through the property, the property has several potential environmental issues, both the City and the County voiced opposition to this location and a previous attempt

	to put the land into trust failed.
Petaluma South Alternative	The site is adjacent to residential neighborhoods, existing roadways restrict access, the proposed gaming facility and hotel would potentially result in adverse traffic impacts on Lakeview Highway and opposition to this location was anticipated from the City, County, and local homeowners.
Wastewater Plant Alternative	The property appeared to contain extensive wetlands, the proposed gaming facility and hotel would potentially result in adverse traffic impacts on Lakeville Highway and the County desires the property for expansion of wastewater facilities.
Agilent Alternative	Rohnert Park city officials were concerned with the proximity of the site to a large residential development that contains an elementary school and large park, and the site is not located near a major freeway, therefore traffic would be forced to flow through a number of local streets in order to access the site. In addition, the site has now been committed to another development.
Skaggs Island Alternative	The site is now a part of the San Pablo Bay National Wildlife Refuge and slated for restoration. It is therefore not suitable for large-scale commercial re-development.
Hamilton Air Force Base Alternative	Much of the former military base has already been redeveloped for office use, residential use, or wetland restoration, and is thus not available for reuse. Neither Novato nor Marin County officials suggested this site to the Tribe as a preferred site for the development of a gaming facility. A nearby, southern Sonoma County site that was already owned by the Tribe was available for inclusion in the EIS (the Lakeville site).
Mare Island Alternative	This site is located outside of Sonoma and Marin Counties, which is outside of the Tribe's service area, as designated by the Graton Rancheria Restoration Act (see **Section 1.1**). Therefore, the development of a gaming facility and hotel would not be possible on Mare Island.
Mecham Road Landfill Alternative	The Mecham Road Landfill is still an operating landfill (albeit in limited capacity). Large-scale commercial developments are generally not well suited for redevelopment of landfill sites. The County is apparently interested in selling the landfill property to a private owner that would continue to utilize the property for landfill purposes. Two central Sonoma County sites, which are either partially or fully owned by the Tribe (the Stony Point and Wilfred sites), were available for inclusion in the EIS.
Sonomarin Drive In Alternative	The site is located next to a creek and is currently utilized for flood control purposes. The site is not large enough to accommodate the proposed project. A nearby, southern Sonoma County site that was already owned by the Tribe was available for inclusion in the EIS (the Lakeville site).

SOURCE: AES, 2008.

VINEYARD AND WINE PRODUCTION FACILITY ALTERNATIVE

The Vineyard and Wine Production Facility Alternative would consist of an approximately 300-acre vineyard and a 9,000-square-foot winery with a tasting room. This alternative was not feasible for several reasons. Profits, return on investment, the ability to obtain working capital, and job

creation were all very low. Profits were also found to be extremely volatile based on the dependency on a strong grape harvest. This alternative would fail in providing funding for Tribal government and services (see **Section 1.4**).

FOOD PROCESSING FACILITY ALTERNATIVE

The Food Processing Facility Alternative would consist of an approximately 20,000-square-foot food processing facility. Customers would include small food manufacturers requiring excess capacity. This alternative was not feasible for several reasons. Profits and job creation were very low, thereby failing to achieve the purpose of the proposed action (see **Section 1.4**). Return on investment would also be fairly low. No current or potential future customer base was identified. Finally, no source of startup capital was identified.

REAL ESTATE DEVELOPMENT ALTERNATIVE

A number of specific real estate developments were considered primarily based on regional fit. These developments include a premium outlet retail shopping center, an office complex, a light industrial complex, and a retirement community development.

Premium Outlet Retail Shopping Center

The Premium Outlet Retail Shopping Center Alternative would constitute an approximately 200,000-square-foot, high-end, outlet-format, retail center. The shopping center would contain approximately 50 stores with an average size per store of 4,000 square feet. This alternative was not feasible primarily because heavy competition was anticipated with three nearby premium outlet retail shopping centers. These outlets are located in Petaluma, Napa, and St. Helena and are operated by Chelsea Property Group, an experienced operator of over 50 outlet centers across the United States. In addition, no source of startup capital was identified. This alternative failed to fulfill the needs of improving Tribal socioeconomic status and providing employment opportunities (see **Section 1.4**).

Office Complex

The Office Complex Alternative would constitute an approximately 100,000-square-foot, mixed-use office and retail center. This alternative was not feasible for several reasons. Profits and return on investment would be very low. There is currently an oversupply of commercial/office square footage in the North San Francisco Bay Area (Federated Indians of Graton Rancheria, 2002a). Finally, no source of startup capital was identified.

Light Industrial Complex

The Light Industrial Complex Alternative would constitute an approximately 100,000-square-foot light industrial complex. This alternative was not feasible for several reasons. Profits and return on

investment were very low. There is currently an oversupply of commercial/light industrial square footage in the North San Francisco Bay Area (Federated Indians of Graton Rancheria, 2002a). Finally, no source of startup capital was identified.

Retirement Community Development

The Retirement Community Development Alternative would constitute an approximately 300-unit high-end independent living community. Tenants would be high-functioning retirees living unassisted. The development would have several services and amenities including a dining program, 24-hour staffing, housekeeping services, an activities program, a pool, an exercise room, a game room, and a library. This alternative was not feasible primarily because of low job creation, as well as a lack of expertise to operate such a facility. In addition, no source of startup capital was identified.

2.9.2 ALTERNATIVE SITES FOR GAMING

Before selecting the Stony Point site and later the Wilfred site as the proposed location for gaming, the Tribe evaluated approximately 48 other potential sites throughout its aboriginal territory. The majority of these sites were soon eliminated for a variety of reasons, environmental and otherwise. After much deliberation, the Tribe narrowed its range of sites down to the Stony Point Site, the Lakeville Site, and six of the seven sites shown in **Figure 2-34**. A seventh potential location, the Agilent Site, was later added to the list and is discussed below.

After selecting the Stony Point Site as the initial preferred site, the Tribe continued to search for other potential locations in its aboriginal territory that were more environmentally preferable than the Stony Point Site. In the Fall of 2004, approximately 200 acres owned by Agilent Technologies in the City of Rohnert Park (the Agilent Site) were offered for sale. The Agilent site appeared to be less environmentally sensitive than the Stony Point Site, given that half of the Agilent Site is currently developed for light industrial uses. Ultimately, however, the Agilent Site and the six other alternative sites were eliminated from further consideration for the reasons described below. As noted above in **Section 2.1**, after deciding not to purchase the Agilent Site, the Tribe still continued to pursue alternative sites that were less environmentally sensitive than the Stony Point Site. In fact, the Tribe eventually decided to abandon the Stony Point Site in favor of the slightly different compilation of parcels constituting the Wilfred Site.

A number of additional alternative sites that commenters identified during the scoping period were also considered for inclusion in the EIS, but ultimately eliminated from further consideration for the reasons stated below.

SOURCE: Microsoft Streets & Trips, 2004; AES, 2005

Figure 2-34

Alternatives Eliminated from Further Consideration – Alternative Gaming Sites

COTATI ALTERNATIVE

The Cotati Alternative consists of a 60-acre alternative site for development of a gaming facility and hotel located near the City of Cotati. This site was not considered further for several reasons. The site is too small for development of a gaming facility and hotel. In addition, the freeway interchange is too small to accommodate increased traffic flows. At the time the site was visited, there was already a housing project underway on the land. Finally, the site is located outside of the urban growth boundary of the City of Cotati.

AGILENT ALTERNATIVE

The Agilent Alternative consists of a 200-acre alternative site for development of a gaming facility and hotel located in the City of Rohnert Park (**Figure 2-35**). There are currently five large buildings encompassing approximately 700,000 square feet, and associated parking on the site (**Figure 2-36**). These facilities have been used for various purposes by Agilent Technologies over the years, but are currently only sparsely used. A preliminary environmental analysis was conducted of the Agilent site to determine its feasibility when compared with the Stony Point Site (AES, 2004a). Given that development could largely be limited to currently disturbed areas, impacts to biological resources would be lessened on the Agilent site.

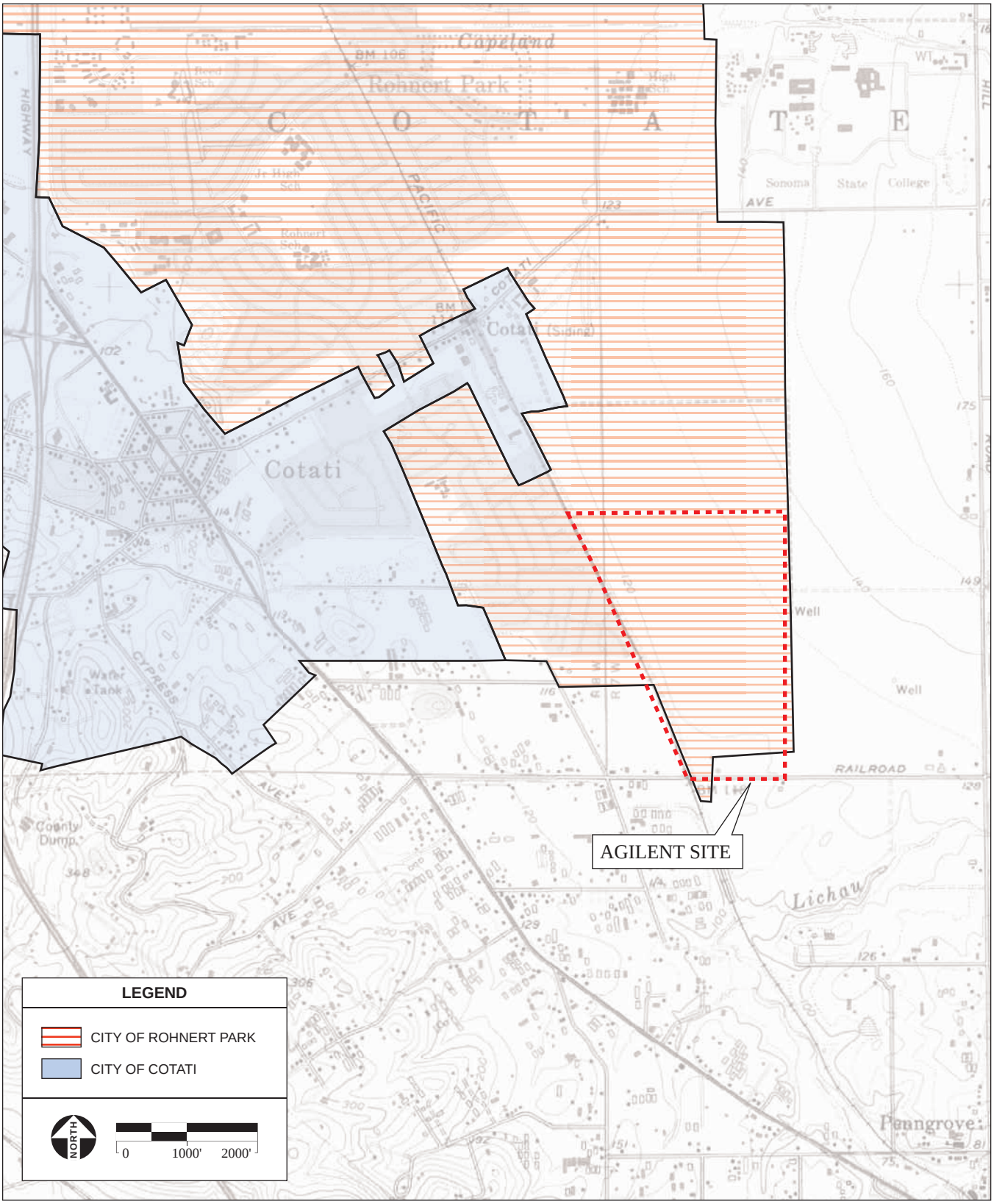
Nonetheless, this site was not further considered for several reasons. The Agilent site is located adjacent to a large residential development that contains an elementary school and a large park. In consulting with the City of Rohnert Park, officials were extremely concerned with the proximity to this residential development and appeared unlikely to support the siting of the casino on the Agilent site. In addition, the Agilent site is not located near a major freeway. Thus, traffic would be forced to flow through a number of local streets in order to access the site. Furthermore, the site has now been committed to another development (City of Rohnert Park, 2006).

PETALUMA NORTH ALTERNATIVE

The Petaluma North Alternative consists of a 190-acre alternative site for development of a gaming facility and hotel. The site is located partly within the City of Petaluma and partly in Sonoma County. This site was not further considered for several reasons. A portion of the site is located within the 100-year floodplain and is subject to flooding. The property has been subdivided and currently has multiple owners. Expensive private homes already exist in the area. The site has insufficient traffic flow and inadequate access to US-101. Finally, City of Petaluma officials expressed concerns with each of the alternative locations in Petaluma that were considered.

OUTLET MALL ALTERNATIVE

The Outlet Mall Alternative consists of a 115-acre alternative site for development of a gaming facility and hotel located on the site of the Petaluma Outlet Mall. This site was ultimately



SOURCE: "Cotati, CA" USGS 7.5 Minute Topographic Quadrangle,
Un-sectioned Area "Llano De Santa Rosa", T6N, R8W, Mt. Diablo Baseline and Meridian; AES, 2004

Figure 2-35
Agilent Site - Site and Vicinity Map

SOURCE: AES, 2005

Figure 2-36
Agilent Site - Aerial Photo

rejected for several reasons. The land footprint is too long and thin for development of a gaming facility and hotel. The site is located within the 100-year floodplain and is subject to flooding. The site has poor access to freeway interchanges. A river runs through the property and wetlands are present. The property has been subdivided and currently has multiple owners. An outlet mall exists on the property and the owners are not interested in selling. Finally, City of Petaluma officials expressed concerns with each of the alternative locations in Petaluma that were considered.

PETALUMA SOUTH ALTERNATIVE

The Petaluma South Alternative consists of a 128-acre alternative site for development of a gaming facility and hotel located in the City of Petaluma. This site was not further considered for several reasons. The site is adjacent to residential neighborhoods. Existing roadways restrict access to the site. In addition, the proposed gaming facility and hotel would potentially result in adverse traffic impacts on Lakeview Highway. Finally, opposition to this location was anticipated from the City, County, and local homeowners.

WASTEWATER PLANT ALTERNATIVE

The Wastewater Plant Alternative consists of an alternative site for development of a gaming facility and hotel. The site is located in the vicinity of wastewater disposal fields near the City of Petaluma. This site was not further considered for several reasons. The property appeared to contain extensive wetlands. In addition, the proposed gaming facility and hotel would potentially result in adverse traffic impacts on Lakeville Highway. Finally, the County desires the property for expansion of wastewater facilities.

HAYSTACK LANDING ALTERNATIVE

The Haystack Landing Alternative consists of a 37-acre alternative site for development of a gaming facility and hotel located near the City of Petaluma. This site was ultimately rejected for several reasons. The land footprint is too long and thin and the site is too small for development of a gaming facility and hotel. Existing roadways restrict access to the site. The site is located on bay mud, which could potentially cause foundation issues. A railroad runs through the property. The property has several potential environmental issues, including leach ponds. The property also contains wetlands, which are connected to the Petaluma River. The City and the County have both voiced opposition to this alternative location. Finally, a previous attempt by another tribe to put the land into trust failed.

SKAGGS ISLAND ALTERNATIVE

Skaggs Island is a 4,400 acre island, which is the site of a former military base. It is located along the San Pablo Bay in southern Sonoma County. This site was suggested by commenters during the scoping period as an alternative site for the development of a gaming facility and hotel. This site was considered but ultimately eliminated from further consideration because it is now an integral

part of the San Pablo Bay National Wildlife Refuge and slated for restoration. It is therefore not suitable for large-scale commercial re-development.

HAMILTON AIR FORCE BASE ALTERNATIVE

The former Hamilton Air Force Base is located in northern Marin County near the City of Novato. This site was suggested by commenters during the scoping period as an alternative site for the development of a gaming facility and hotel. This site was ultimately eliminated from further consideration for several reasons. First, much of the former military base has already been redeveloped for office use, residential use, or wetland restoration, and is thus not available for reuse. Second, neither Novato nor Marin County officials suggested this site to the Tribe as a preferred site for the development of a gaming facility. Finally, a nearby, southern Sonoma County site that was already owned by the Tribe was available for inclusion in the EIS (the Lakeville site).

MARE ISLAND ALTERNATIVE

The former Naval shipyard at Mare Island is a 5,600 acre property located in Solano County, adjacent to the City of Vallejo. This site was suggested by commenters during the scoping period as an alternative site for the development of a gaming facility and hotel. This site was eliminated from further consideration because it is located outside of Sonoma and Marin Counties, which is outside of the Tribe's service area, as designated by the Graton Rancheria Restoration Act (see **Section 1.1**). Therefore, the development of a gaming facility and hotel would not be possible on Mare Island.

MECHAM ROAD LANDFILL ALTERNATIVE

The Mecham Road Landfill is a 170-acre property in central Sonoma County near the City of Petaluma. This site was suggested by commenters during the scoping period as an alternative site for the development of a gaming facility and hotel. This site was ultimately eliminated from further consideration for several reasons. First, this is still an operating landfill (abeit in limited capacity). Second, large-scale commercial developments are generally not well suited for redevelopment of landfill sites. Third, the County is apparently interested in selling the landfill property to a private owner that would continue to utilize the property for landfill purposes. Finally, two central Sonoma County sites, which are either partially or fully owned by the Tribe (the Stony Point and Wilfred sites), were available for inclusion in the EIS.

SONOMARIN DRIVE IN ALTERNATIVE

The former Sonomarin Drive In is an approximately 40-acre former Drive In movie theater property located on the Sonoma/Marin County border near US-101. This site was suggested by commenters during the scoping period as an alternative site for the development of a gaming facility and hotel. This site was ultimately eliminated from further consideration for several reasons. First, the site is located next to a creek and is currently utilized for flood control purposes.

Second, the site is not large enough to accommodate the proposed project. Finally, a nearby, southern Sonoma County site that was already owned by the Tribe was available for inclusion in the EIS (the Lakeville site).

2.10 ALTERNATIVE H –REDUCED INTENSITY (WILFRED SITE)

Based on comments received by cooperating agencies and at the request of the Tribe, an eighth alternative (Alternative H) has been added to the EIS analysis. Alternative H is a reduced intensity casino alternative with the same components as the reduced intensity Alternative D but located on the Wilfred Site.

Alternative H consists of a scaled-down version of Alternative A. And is sized the same as and includes the same components as Alternative D (see **Table 2-3**). The casino-hotel resort's general location would be the same as in Alternative A; however, project components would differ from those included in Alternative A. **Figure 2-37** shows the site plan for Alternative H.

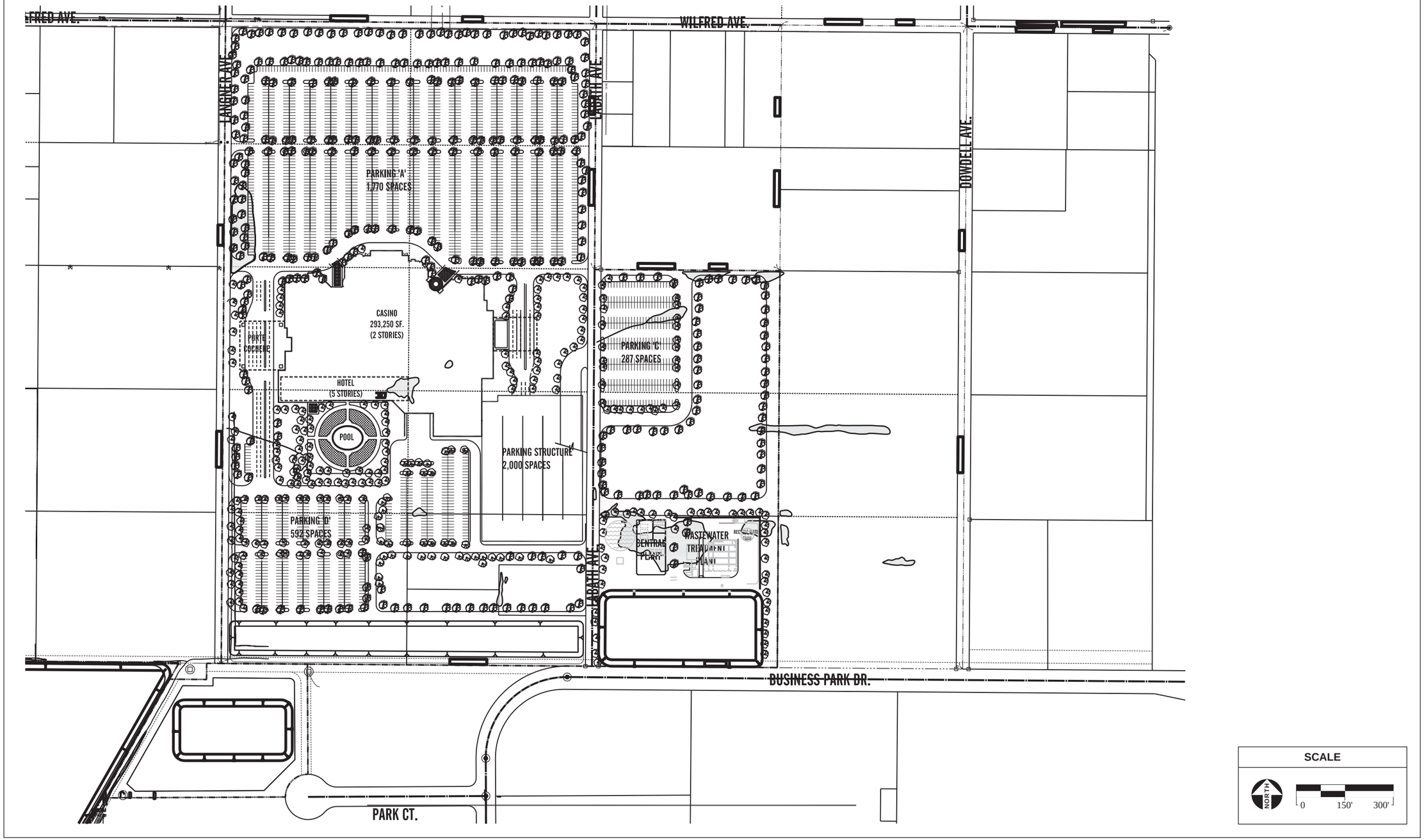
The exterior design of the resort would be very similar to that shown in **Figure 2-2**. The primary differences would be the smaller scale of Alternative H and absence of the spa and some entertainment venues. The resort is expected to employ approximately 2,100 employees. Except for provisions related to revenues, Tribal-State Compact (or Secretarial procedures) requirements are not expected to differ from those of Alternative B. Access to the casino-hotel resort would be the same as Alternative A.

2.10.1 MANAGEMENT CONTRACT

As with Alternative A, Alternative H would require NIGC approval of a management contract between the Tribe and SC Sonoma Management before gaming could take place (see **Section 2.2.1**).

2.10.2 CASINO AND RELATED AMENITIES

The two-story casino would consist of a mixture of uses, including: banking and administration facilities, gaming commission offices, a primary gaming area, a high-limit gaming area, and a gift shop. Numerous food and beverage outlets would be located in the facility, including: a buffet, three bars, four service bars, a food court, and a total of four restaurants. The casino would also contain an entertainment lounge and banquet/meeting space. Unlike Alternative A, Alternative H would not contain a nightclub or an events center. A detailed listing of each component is provided in **Table 2-3**.



SOURCE: Friedmutter Group, 2006; AES, 2007

Figure 2-37
Alternative H – Site Plan

As with Alternative A, alcohol would be served throughout the casino, including the gaming floor. Accordingly, casino patrons would be required to be 21 years of age or older, and the Tribe would adopt a "Responsible Alcoholic Beverage Policy" that would include, but not be limited to, checking the identification of patrons and refusing service to those who are visibly intoxicated. Smoking would be permitted within the casino facility; however, non-smoking sections would be provided.

2.10.3 HOTEL

Unlike Alternative A, Alternative H does not include a spa area. A detailed listing of each hotel component is contained above in **Table 2-3**. For Alternative H, the hotel would be downsized to 5 stories and 100 rooms.

2.10.4 PARKING

A total of 4,649 parking spaces would be provided to serve the patrons and employees of the resort and supporting facilities. A parking structure, providing 2,000 of the 4,649 total parking spaces, would be connected to the eastern elevation of the casino-hotel resort.

2.10.5 CONSTRUCTION

Alternative H would be constructed after the Wilfred site has been placed into federal trust. Construction duration is estimated at 24 months. As with Alternative A, construction would involve demolition; earthwork; placement of concrete foundations; steel, wood, and concrete structural framing; masonry; electrical and mechanical work; building and site finishing; and paving, among other construction activities. The Tribe would adopt the building standards and BMPs previously stated for Alternative A.

2.10.6 DRAINAGE

Alternative H incorporates fill to elevate the proposed gaming facility sufficiently to allow stormwater to gravity flow and empty into a detention basin. It is anticipated that the on-site grading will be balanced, based upon the southern Wilfred site detention system excavation being used on-site.

Runoff would be conveyed by an underground drainage system to the detention basin, and, after filtration, to the Bellevue-Wilfred Channel, which feeds into Laguna de Santa Rosa. The drainage plan includes the use of several features designed to filter the surface runoff prior to release into the natural drainage channels on-site. Runoff from the Wilfred Site primarily will be directed into storm drainpipes, with sheet flow to vegetated swales present along the perimeter of developed

areas. Overflow drainage releases would be developed on-site, along the western and eastern edges of the developed area.

Inlets would be placed at appropriate intervals along drainpipes to capture runoff and convey it to the detention basin. Prior to release into the storm drainpipes, runoff would pass through a sediment/grease trap ("Stormceptor") that would filter out suspended solids such as trash and soil sedimentation, oil, grease, and other potential materials that could degrade surface water quality. Vegetated swales would also provide filtering of runoff prior to release into the site drainage channels, by capturing sediment and pollutants.

The grading and drainage plan (**Figure 2-38**) incorporates two areas for storm water detention to reduce increased peak flows resulting from increased impervious surfaces to pre-project levels and to offset reduced floodplain storage caused by the development of project facilities. The first stormwater detention basin would be provided on-site to reduce increased peak flows that result from site development. This basin would assure that post-development runoff peaks from the Wilfred Site would be equal to the existing conditions. Moreover, the basin would attenuate the increase in peak flow that would be generated by obtaining a permit to release tertiary treated effluent from a possible on-site wastewater treatment plant. The detention of water on-site would reduce potential downstream erosion and effects to water quality. All of the proposed facilities would be constructed at least one foot above the 100-year floodplain elevation.

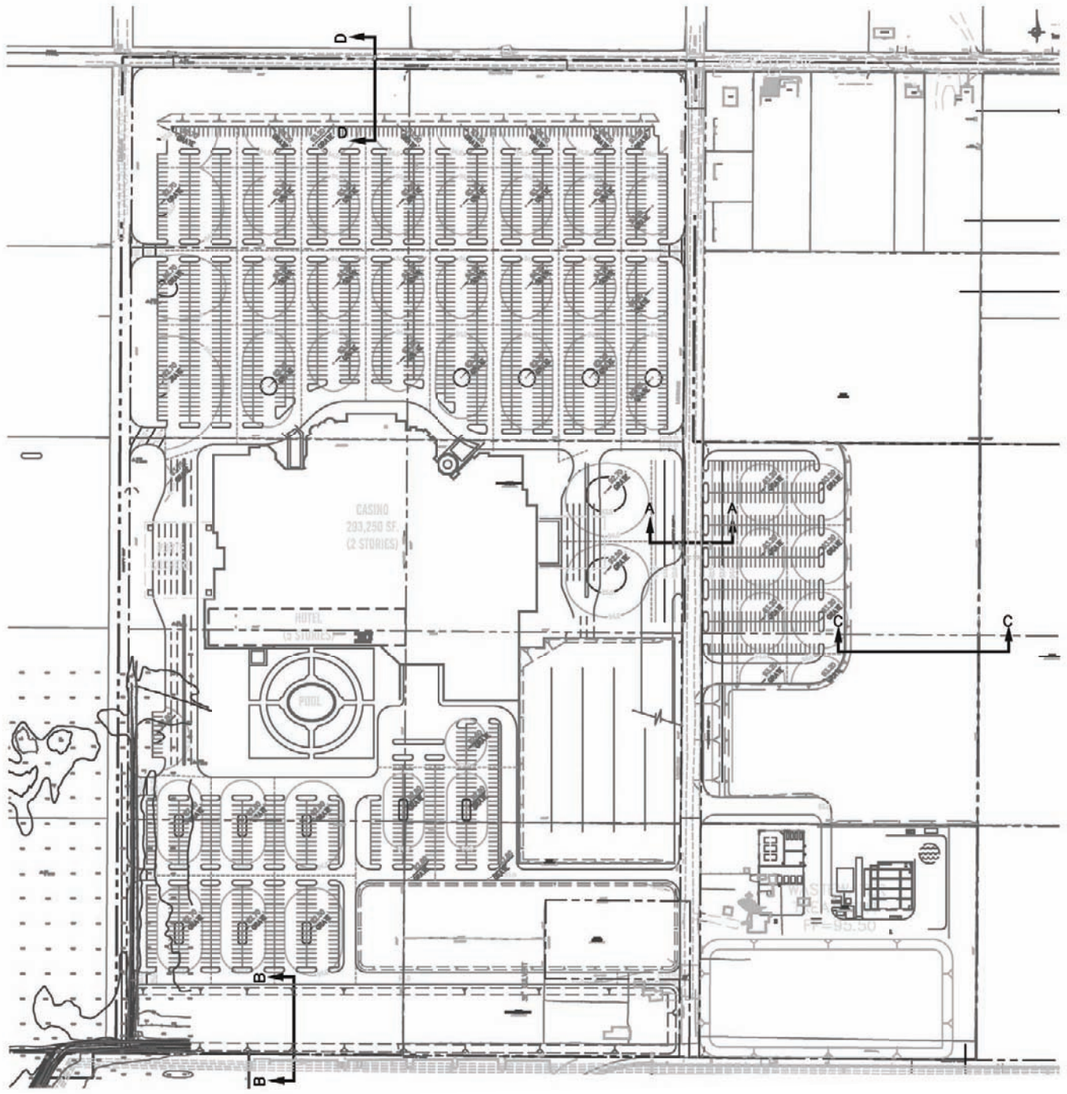
The second storm water detention / flood storage area is proposed to be created in the southern portion of the Wilfred site (see **Figure 2-11**). This detention area will allow for additional storage area to account for the fill placed in the non-regulated Zone X. The depth of the Zone X is considered to be an average of one foot of fill over approximately 63-acres for 63-acre-feet for Alternative H.

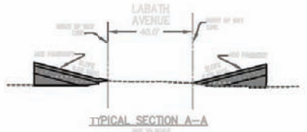
2.10.7 WASTEWATER TREATMENT AND DISPOSAL

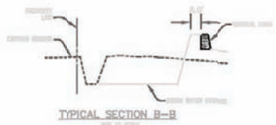
Wastewater generation and treatment capacity needs would be the same as Alternative D (see **Section 2.5.7**). Wastewater treatment options for Alternative H would be similar to Alternative D (see **Section 2.5.7**), with the additional option of treatment at the Laguna WWTP as described in Alternative A. The wastewater disposal options for Alternative H the same as for Alternative A; whereas, the required volume for seasonal storage ponds with be the same as for Alternative D (see **Section 2.2.7** and **Figures 2-39** and **2-40**).

2.10.8 WATER SUPPLY

As with Alternative A, water for domestic use, emergency supply, and fire protection would be provided by on-site wells. Elements of the proposed on-site water facilities include two on-site







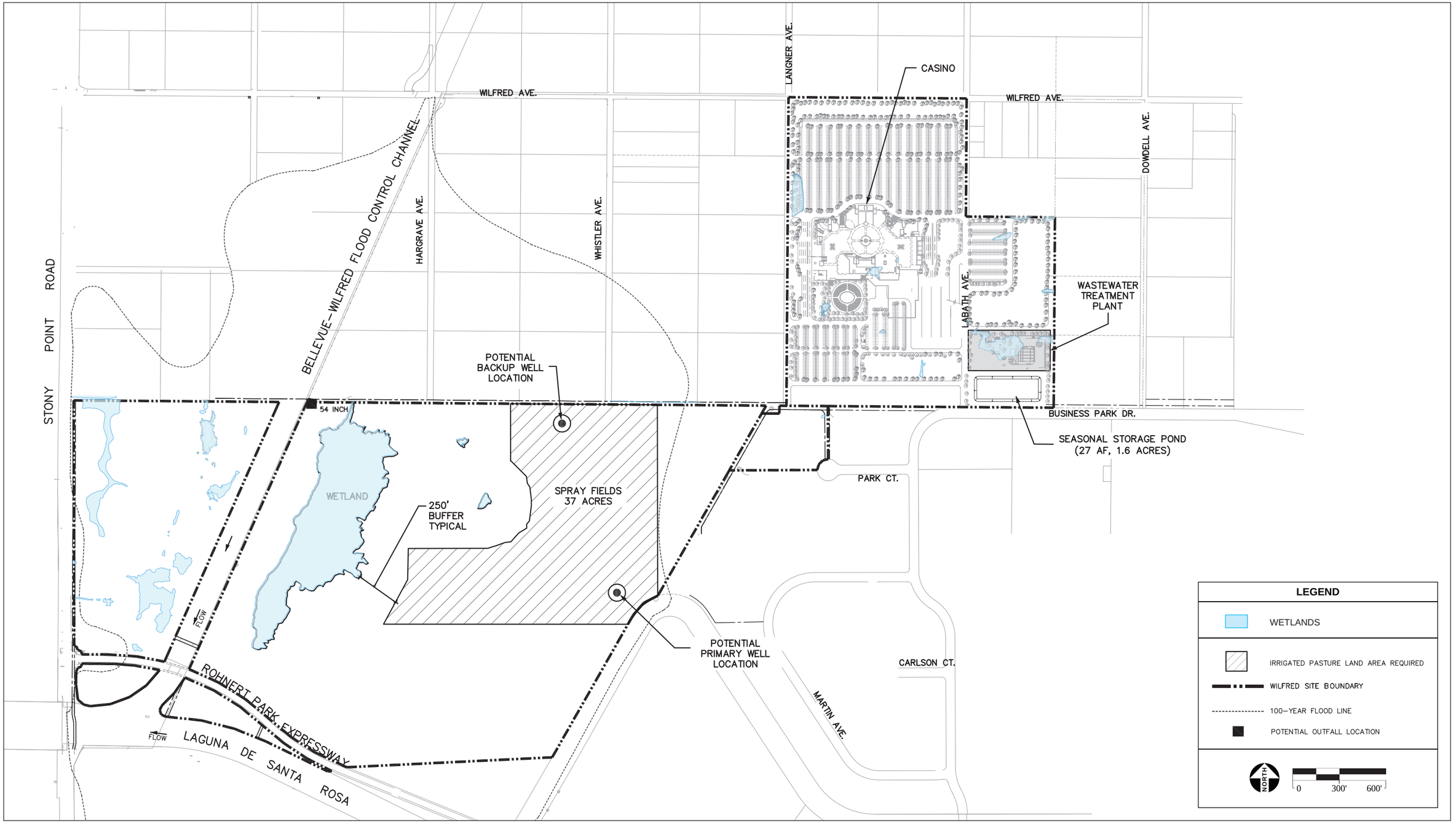
SCALE

NORTH

0 150' 300'

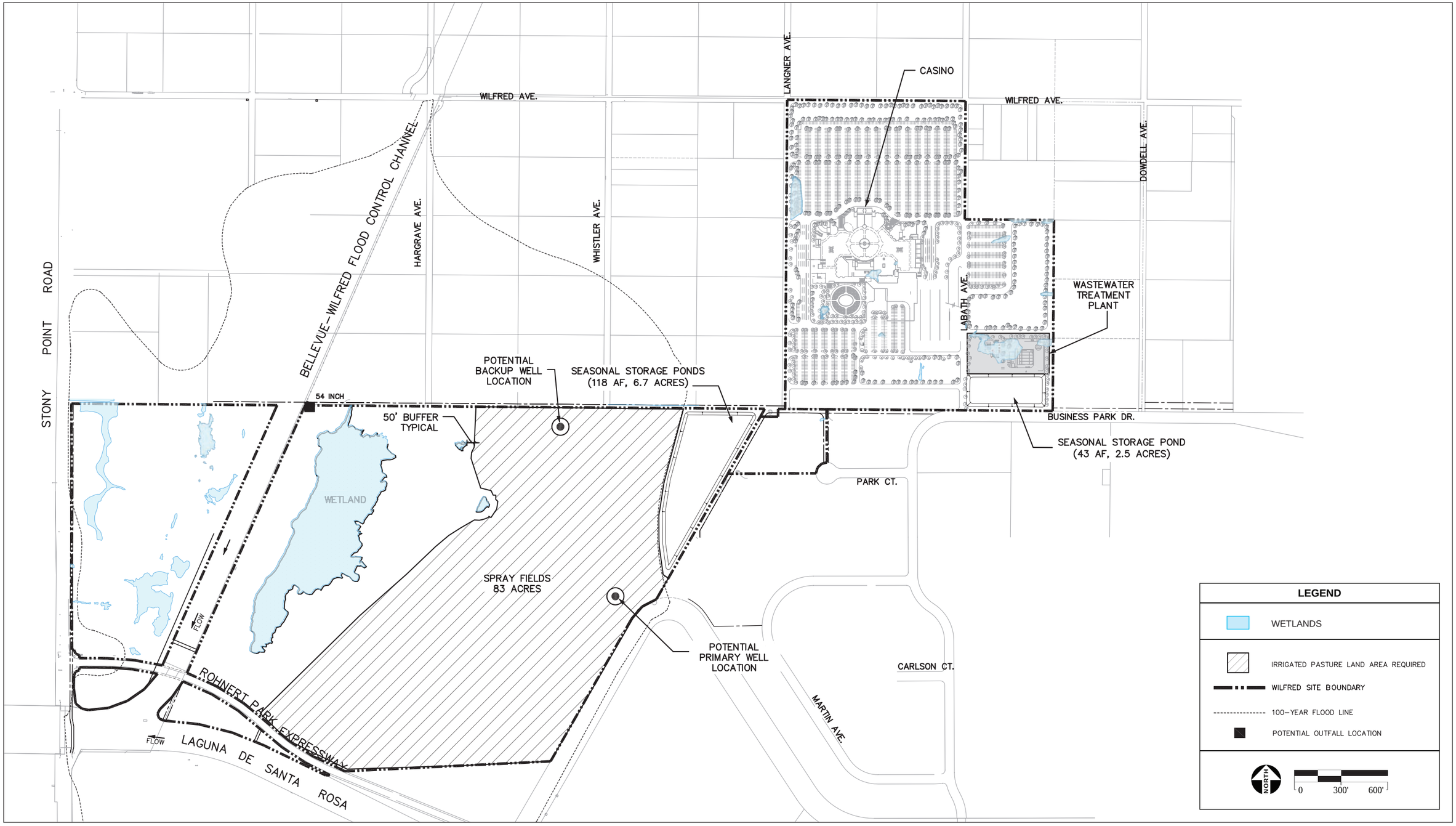
SOURCE: Robert A. Karn & Associates, 8/20/2007; AES, 2007

Figure 2-38
Alternative H – Grading/Drainage Plan



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-39
Alternative H – Water/Wastewater Facilities (Option 2)



SOURCE: HydroScience Engineers, 11/9/2007; AES, 2008

Figure 2-40
Alternative H – Water/Wastewater Facilities (Option 3)

wells, an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system. The water supply quantity and quality for Alternative H is anticipated to be the same as previously described in Alternative D, and the water supply options for Alternative H would be the same as those previously described in Alternative A.

As with Alternative A, recycled water would be utilized for landscape irrigation and potentially toilet flushing. According to the Water and Wastewater Feasibility Study (**Appendix D**), the estimated water supply requirement for Alternative D, 150 gpm, would also apply to Alternative H.

Water would be supplied to Alternative H via two groundwater supply wells (one for redundancy) that would be sized and operated as described for Alternative D.

2.10.9 FUEL STORAGE

Fuel storage requirements would be similar, although reduced in size, when compared with those proposed for Alternative A. Fuel storage practices would be the same as those proposed for Alternative A.

2.10.10 MEMORANDA OF UNDERSTANDING

The MOU with the City does not apply to the Wilfred Site. In addition, given the reduced size and scope of the casino-hotel resort proposed for Alternative H and the lack of a stated desire by the Tribe or the City to renegotiate a similar MOU for Alternative H, the terms of the MOUs with the City and County are not assumed to apply to Alternative H. Of course, it remains possible to modify The MOU with the City for the reduced intensity development on the Wilfred Site (Alternative H).

2.11 PREFERRED ALTERNATIVE

Consistent with the NIGC NEPA Procedures Manual, the NIGC considers an alternative's ability to meet the purpose and need for the proposed action and the overall impact on the environment when selecting a Preferred Alternative. In this case, the full-size casino/hotel resort alternatives (Alternatives A, B, C, and F) would best meet the purpose and need of the proposed action, given that they would maximize long-term Tribal revenues. This revenue source would be used to effectuate the purpose of IGRA to promote "tribal economic development, self-sufficiency, and strong tribal governments (25 U.S.C. Section 2702)." The development of a full-size casino/hotel resort would meet this purpose better than the business park alternative (Alternative E), due to the reduced revenues that would be expected from the operation of a business park, the difficulty in obtaining financing for a business park, and the nearby operation of a business park which may result in reduced demand for another nearby business park until some time in the future. The

development of a full-size casino/hotel resort alternative would also meet this purpose better than the reduced-size casino/hotel resort alternatives (Alternative D and H). The full-size casino/hotel resort alternatives would result in greater sustained revenues for the Tribe and would also allow the Tribe to compete effectively; particularly considering the recently announced expansion of the nearby River Rock Casino (Santa Rosa Press Democrat, 2007). The No Action Alternative (Alternative G) would not result in revenues to the Tribe and would therefore not meet the purpose and need of the proposed action.

Of the alternatives considered, the Wilfred Site alternatives would result in the lowest overall impact on the human environment given that the Wilfred Site is less biologically sensitive than the Stony Point and Lakeville sites, is located in an area planned for development, and closer to existing commercial development. As explained above, of the two alternatives located on the Wilfred Site (A and H), Alternative A would best meet the purpose and need. Alternative H would result in slightly lower environmental impacts, due to the reduced intensity of development. Mitigation measures, however would provide that most post-mitigation impacts of Alternative A would be similar to post-mitigation impacts of Alternative H (for example, while the impacts to neighboring wells may be slightly higher under Alternative A, mitigation measures contained in **Section 5.2.2** would serve to restore neighboring well owners to the same pre-project condition no matter which alternative is developed). Thus, Alternative A is judged by the NIGC to best meet the purpose and need while minimizing impacts on the human environment.

As noted in **Section 2.2.7**, Alternative A includes three options for wastewater disposal. The NIGC would prefer to select option 1 (connection to the regional sewer system) in the Preferred Alternative; however, as an agreement to allow a sewer connection has not yet been reached, this option does not appear to be viable at this time. Of the two on-site treatment and disposal options, Option 3 is viable and has fewer environmental impacts than option 2, which includes a surface water discharge to the Bellevue-Wilfred Channel. Also, option 2 requires a Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permit prior to operation, which has not been obtained. Therefore, the NIGC has selected Alternative A with wastewater disposal option 3 as its Preferred Alternative.