

SECTION 2.0

ALTERNATIVES

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2.1 INTRODUCTION

This section describes the alternatives analyzed within this Environmental Impact Statement (EIS). A reasonable range of alternatives has been selected that includes six development alternatives and a No Action Alternative. Consistent with 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 37 (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, 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.

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 eventually focused 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 preparation of this EIS, numerous environmental constraints to development at the Stony Point Site were identified, including wetlands and flooding. Therefore, 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.

2.2 ALTERNATIVE A – PROPOSED PROJECT

Alternative A consists of the NIGC's approval of a 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, and 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 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. Note that operation of a Class II gaming facility (such as a card room) does not require a compact or Secretarial procedures. 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 management contracts between tribal governments and outside management groups. As part of its review of the management contract, the NIGC will evaluate the overall effect 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 ensure 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))."

The Tribe and SC Sonoma Management or its affiliates have entered into a development contract and a management contract for the construction and operation of the proposed project. Under the terms of the development contract, SC Sonoma Management is assisting the Tribe in obtaining funding for the purchase of land to be taken into trust. SC Sonoma Management would also assist in the construction of the proposed project under the terms of the development contract. Once the casino-hotel resort becomes operational, the management contract would provide SC Sonoma Management with the exclusive right to manage the day-to-day operations of the casino-hotel resort. 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).

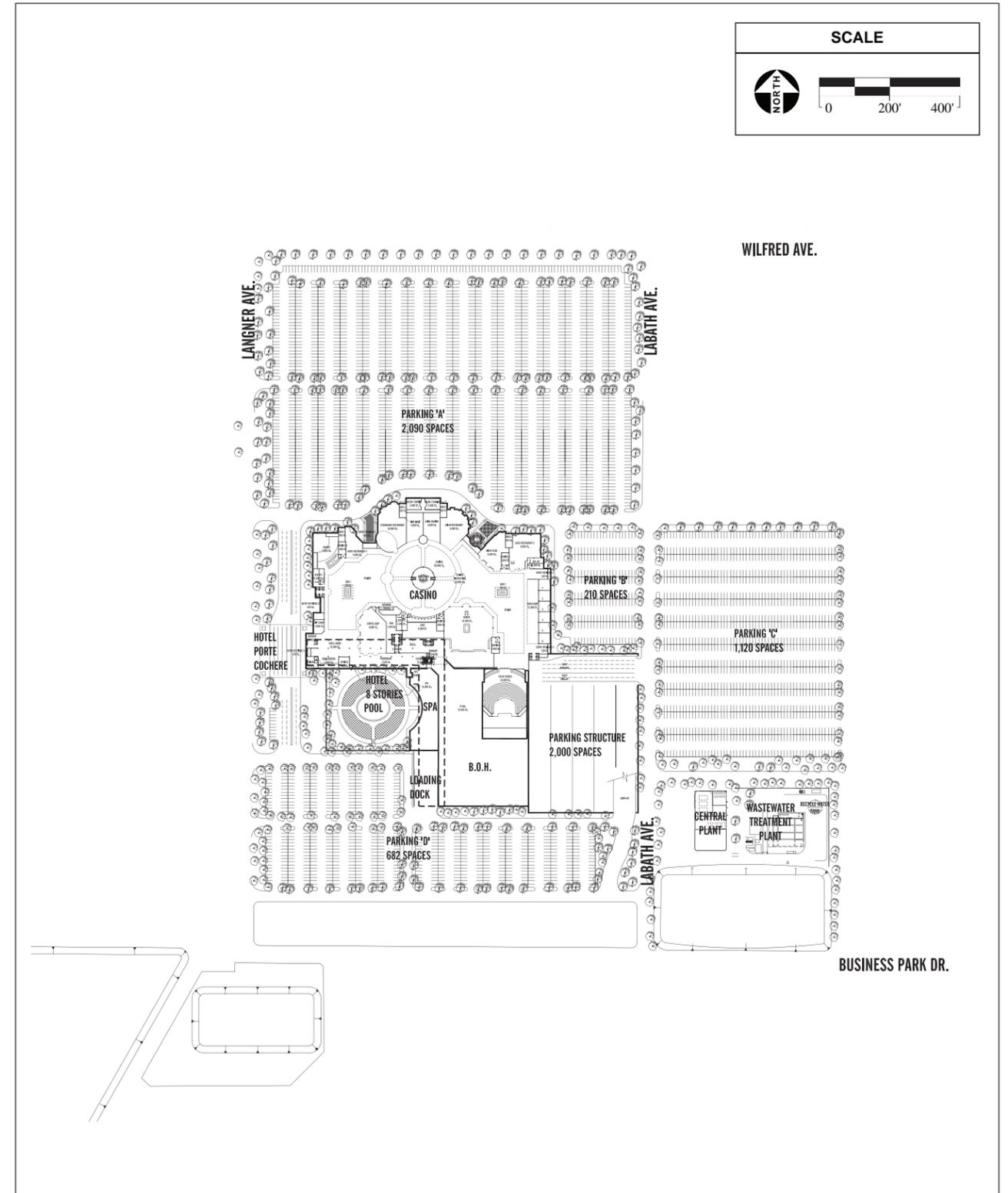
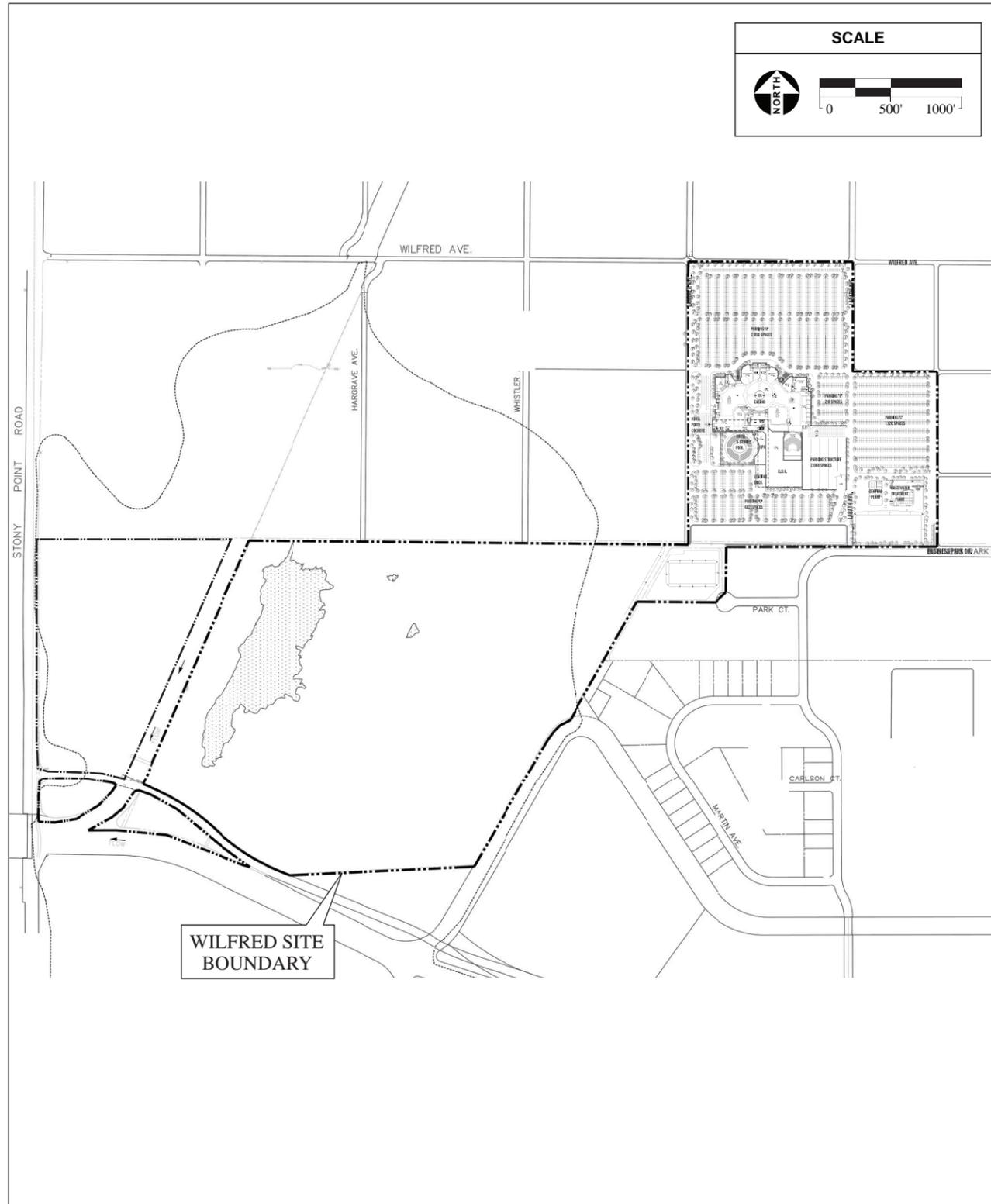




TABLE 2-1
ALTERNATIVE A – PROPOSED PROJECT COMPONENTS

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.

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. Among other activities, 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. 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

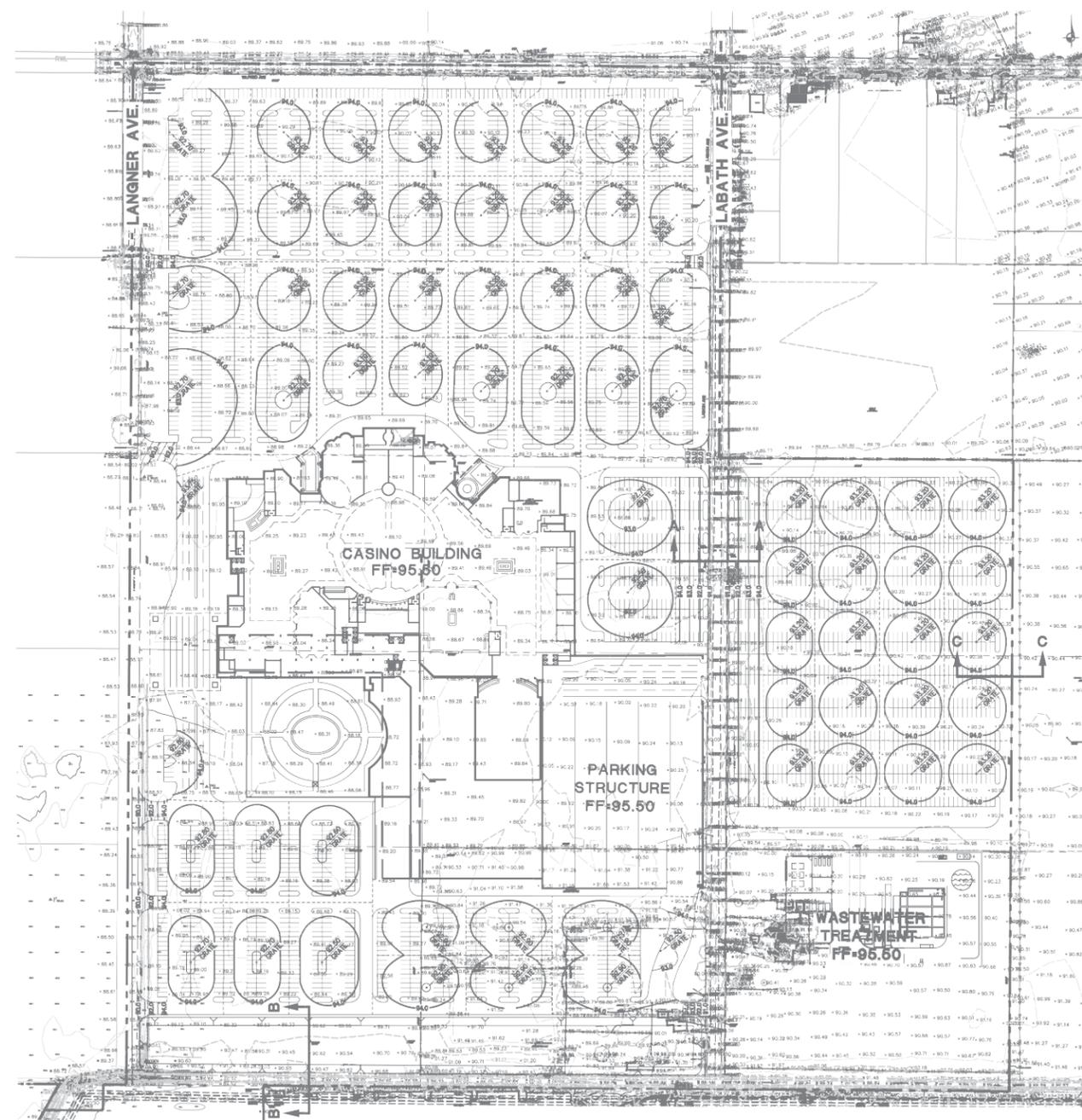
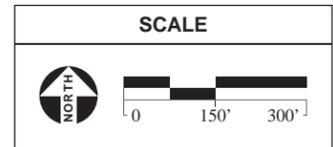
Drainage Report (reproduced in **Appendix C**), including BMPs for paving operations, structure construction, painting, material delivery/storage, material use, spill prevention/control, solid waste management, hazardous waste management, concrete waste management, sanitary/septic waste management, vehicle/equipment 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. 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. Labath Creek feeds into Hinebaugh Creek and then into the Laguna de Santa Rosa (**Figure 2-3**). 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.

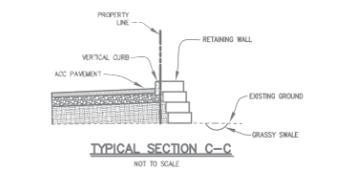
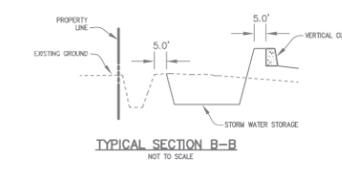
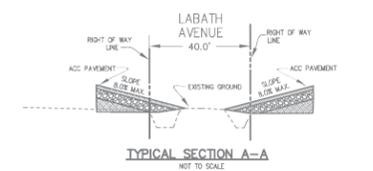
Inlets would be placed at appropriate intervals along drainpipes to capture runoff and convey it to the detention basin. Prior to release into the storm drainpipes, runoff would pass through a sediment/grease trap (“Stormceptor”) that would filter out suspended solids such as trash and soil sedimentation, 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.

A 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 300,000 gallons per day of 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. 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 and the



LEGEND

- PROPOSED MAJOR CONTOUR ——— 252.0
- PROPOSED MINOR CONTOUR ——— 251.0
- CATCH BASIN ○
- GRATE ELEVATION ——— 250.0
- RIDGE LINE - - - - -
- EXISTING SPOT ELEVATION + 91.19



potential treated wastewater discharge into the Bellevue-Wilfred Channel. The detention system would be located on the southern edge of the proposed casino-hotel development area (**Figure 2-4**). 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.

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 G 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, the City of Rohnert Park expressed interest in a hook up (should Alternative A be developed), 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).

TABLE 2-2
WASTEWATER TREATMENT OPTIONS

Proposed Alternative	Wastewater Treatment/ Disposal Option (ranked in expressed order of Tribal preference)	Description
Alternative A	<p><i>Option 1:</i></p> <p><i>Option 2:</i></p> <p><i>Option 3:</i></p>	<p>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 of 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.</p> <p>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).</p> <p>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).</p>
Alternative B	<p><i>Option 1:</i></p> <p><i>Option 2:</i></p>	<p>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).</p> <p>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).</p>
Alternative C	<p><i>Option 1:</i></p> <p><i>Option 2:</i></p>	<p>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).</p> <p>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).</p>
Alternative D	<p><i>Option 1:</i></p> <p><i>Option 2:</i></p>	<p>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).</p> <p>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).</p>
Alternative E	<p><i>Option 1:</i></p> <p><i>Option 2:</i></p>	<p>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).</p> <p>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).</p>
Alternative F	<p><i>Option 1:</i></p> <p><i>Option 2:</i></p>	<p>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).</p> <p>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).</p>
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.

SOURCE: HydroScience, 2006; AES, 2006.

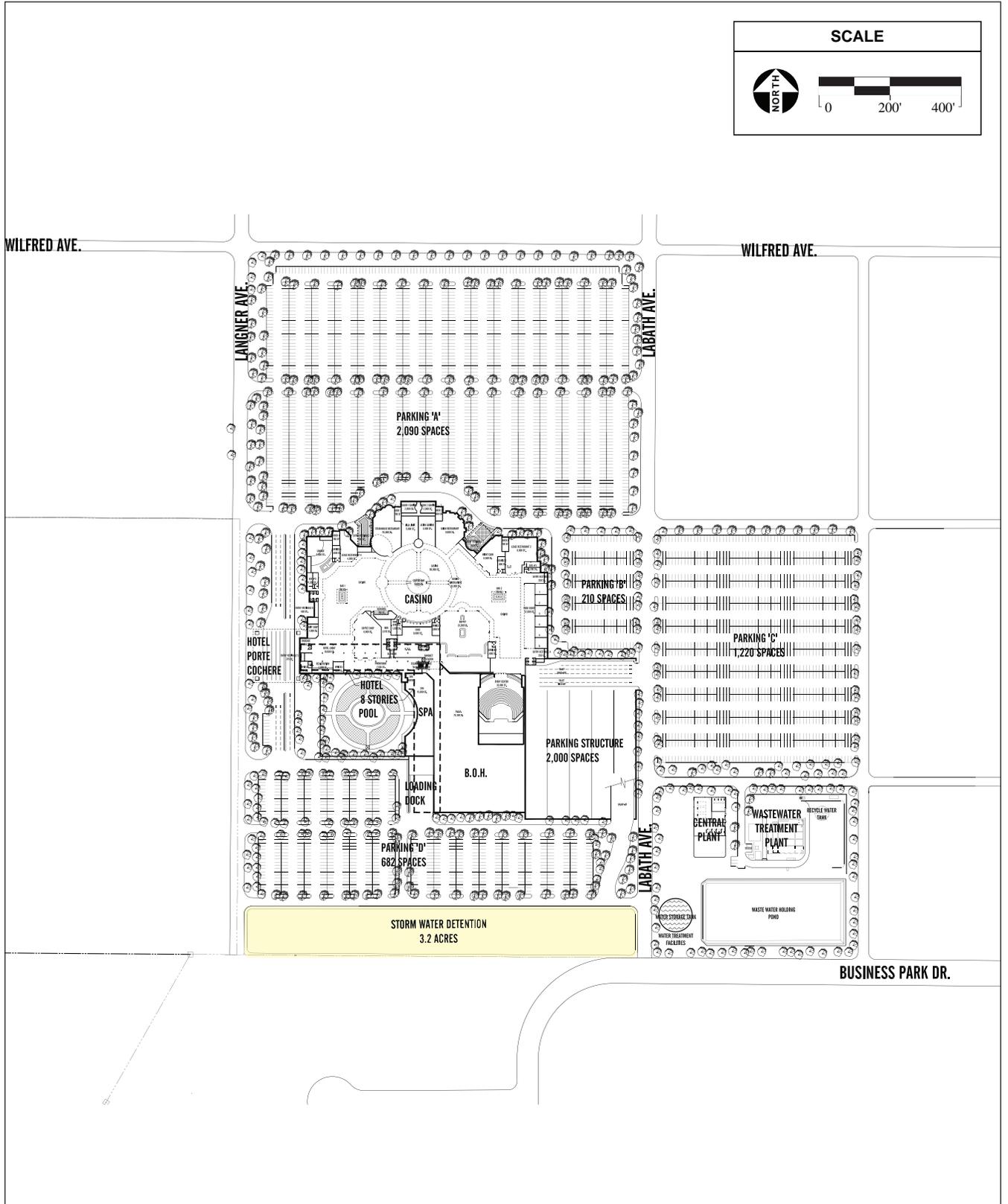


Figure 2-4
Alternative A – Grading/Drainage Plan - Stormwater Detention Basin

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 and the existing 24-inch diameter force main to the Laguna WWTP.
- Pump sewage directly into the sewer force main, bypassing the gravity collection system and existing effluent pump station. Sewage would be conveyed to the Laguna WWTP as described above.
- 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 U.S. Environmental Protection Agency (USEPA). These criteria include:

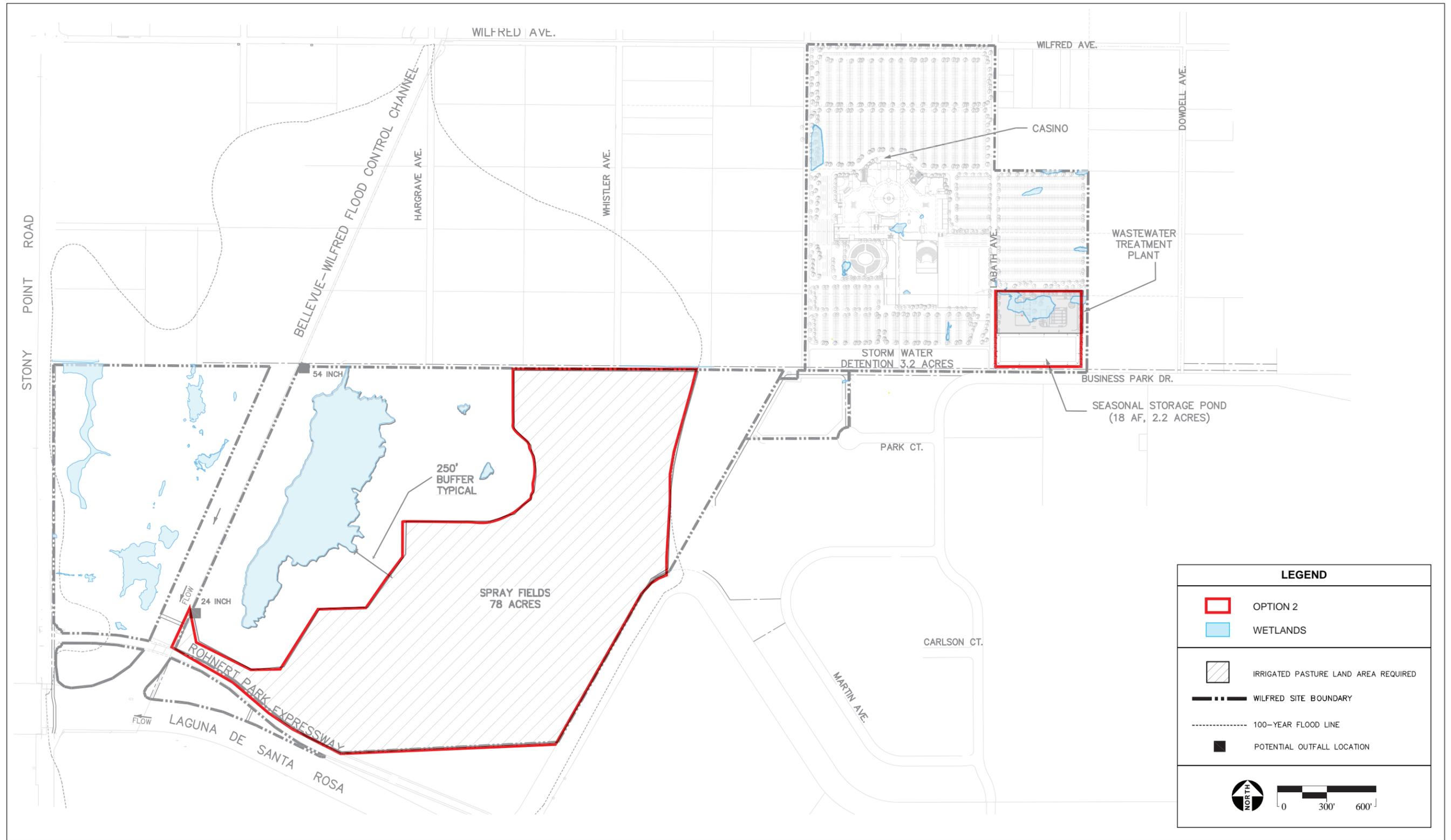
- The technology must be one that is proven, has been accepted by USEPA and is certified by the National Sanitation Foundation.
- The treatment process will be a tertiary treatment process that has the capability of treating wastewater to a quality level that meets California Title 22 standards for unrestricted 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.

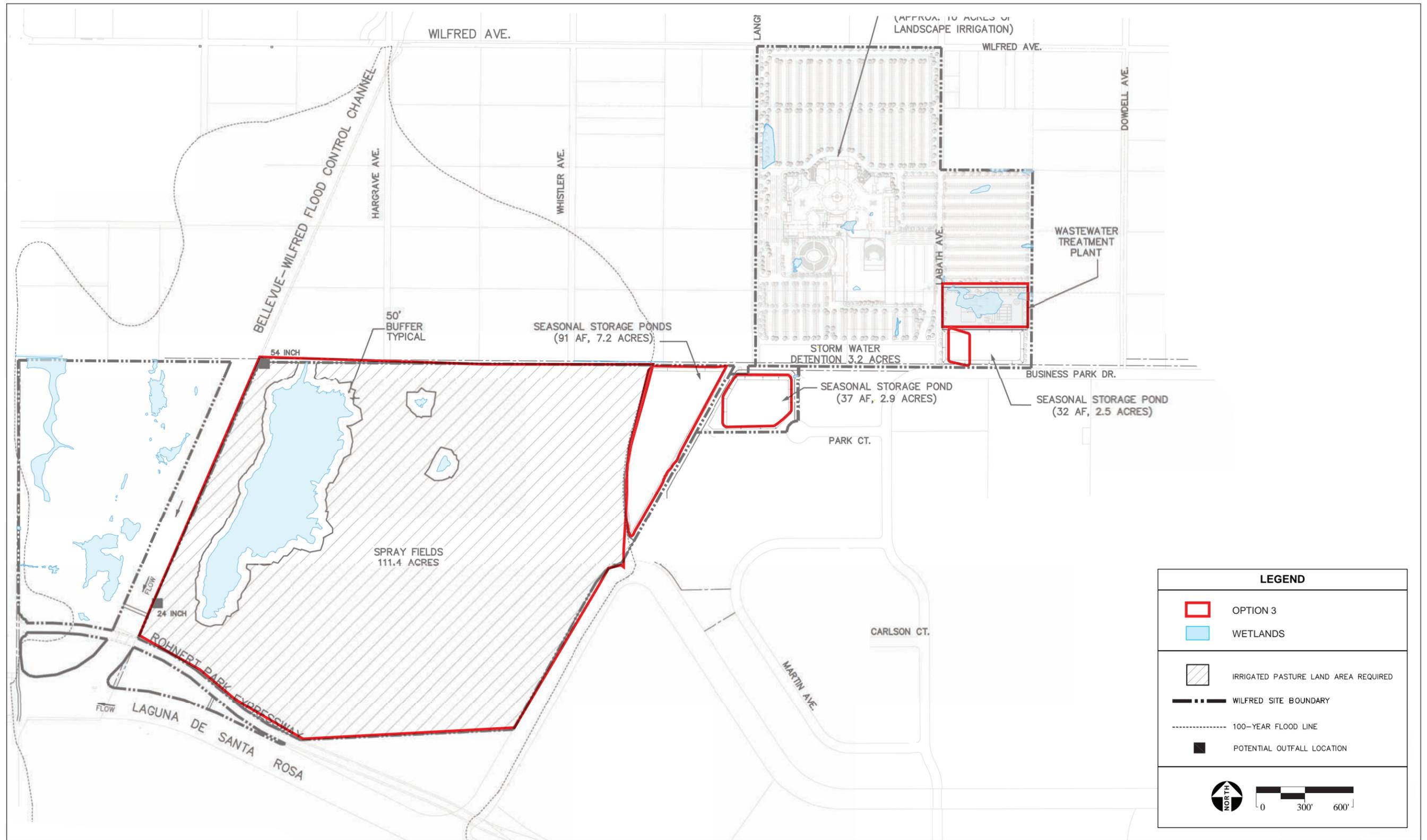
To meet the above criteria, the Tribe would use an immersed membrane bioreactor (MBR) system to provide the highest quality water for reuse or disposal. The MBR is a state-of-the-art system that operates as an activated sludge process run at a high-suspended solids concentration. Running at a high suspended 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 wastewater treatment plant 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 15% 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 **Figures 2-6** and **2-7**. 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 wastewater treatment plants with design capacities of 1.0 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 provides 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 storage of untreated or raw wastewater. 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**, the 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 does not appear to be possible due primarily to uncertainty over SB 610 requirements (**Appendix D**).

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 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 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 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 day 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.
- Allowing 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, 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 agreed to contribute \$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 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 Unified School District, 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 a qualified traffic engineering firm to conduct a traffic engineering study that would identify off-site impacts on traffic (MOU, 2003). A traffic engineering firm has been hired to conduct a traffic engineering study for this EIS.

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).

To the extent determined commercially reasonable, the Tribe agreed to implement recycling, implement 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).

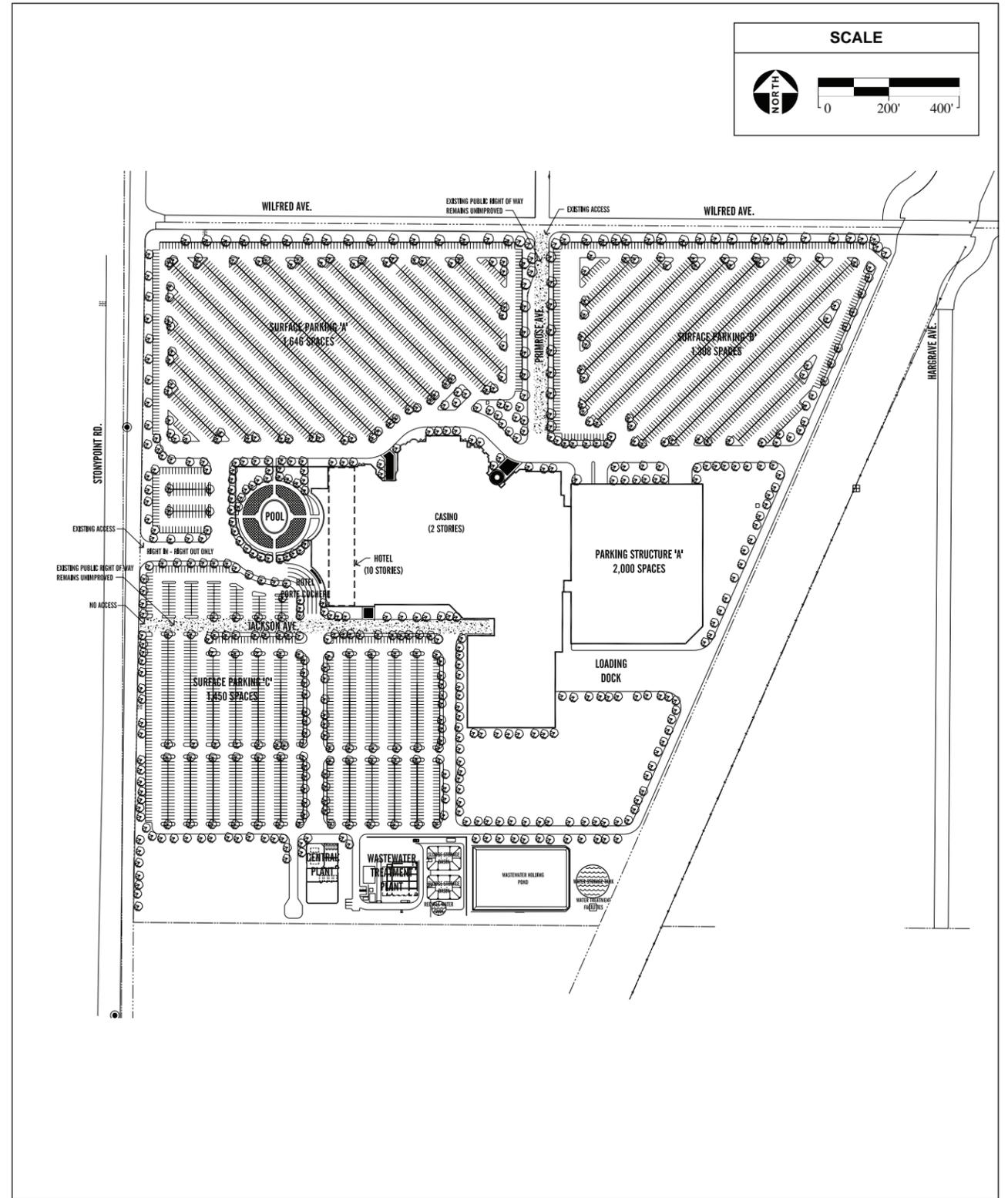
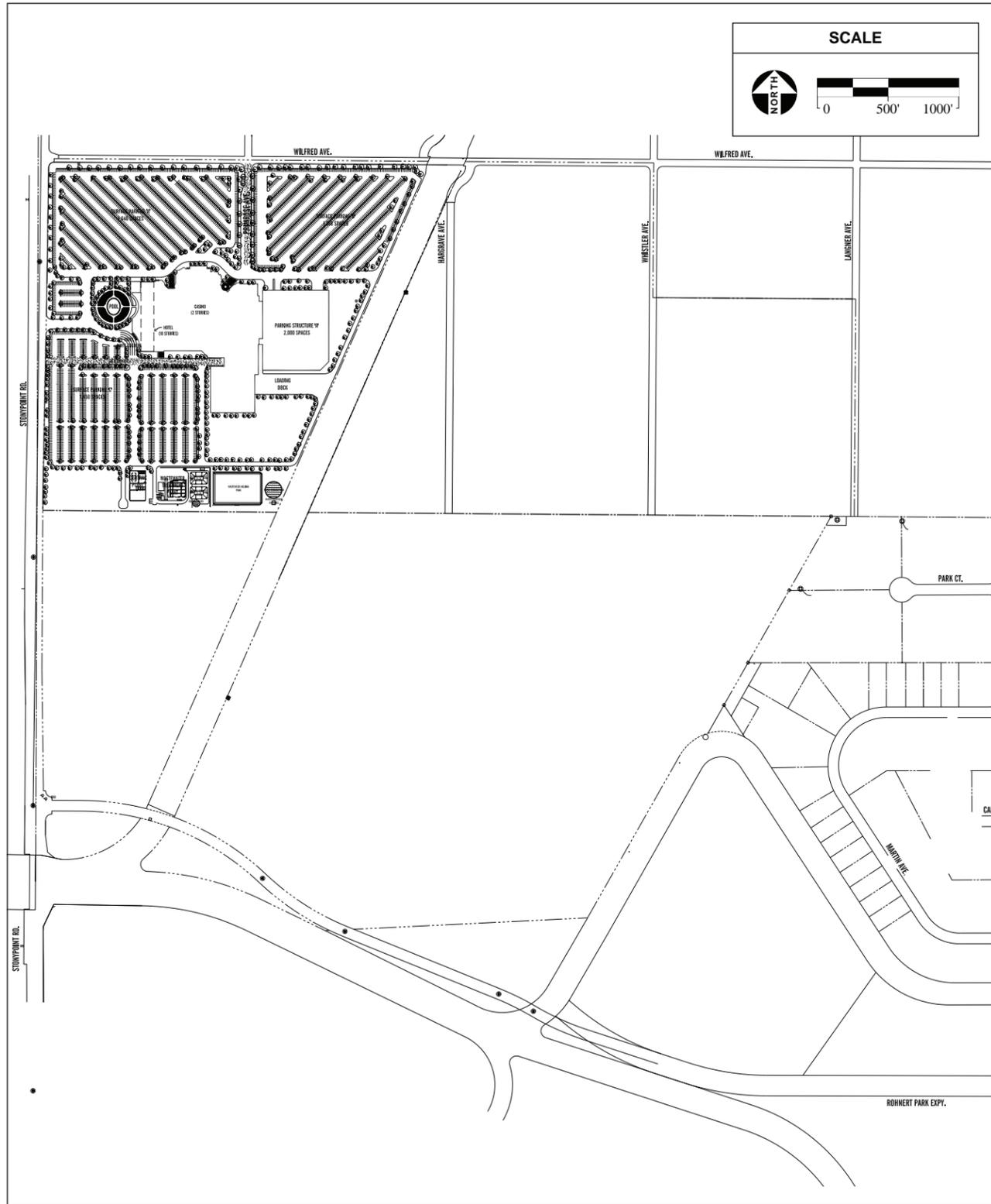
Upon the request of the Tribe, the City agreed to enter into a Mutual Aid Agreement with the Tribe for fire and law enforcement services (MOU, 2003).

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 effects that occur within the County. The MOU includes an arbitration process in order to ensure that an intergovernmental agreement is negotiated, as desired by both parties (MOU, 2004). The Sonoma County MOU can be found 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.

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. 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. 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 northwest corner of the Stony Point Site. See **Section 2.2.6** 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**). 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.

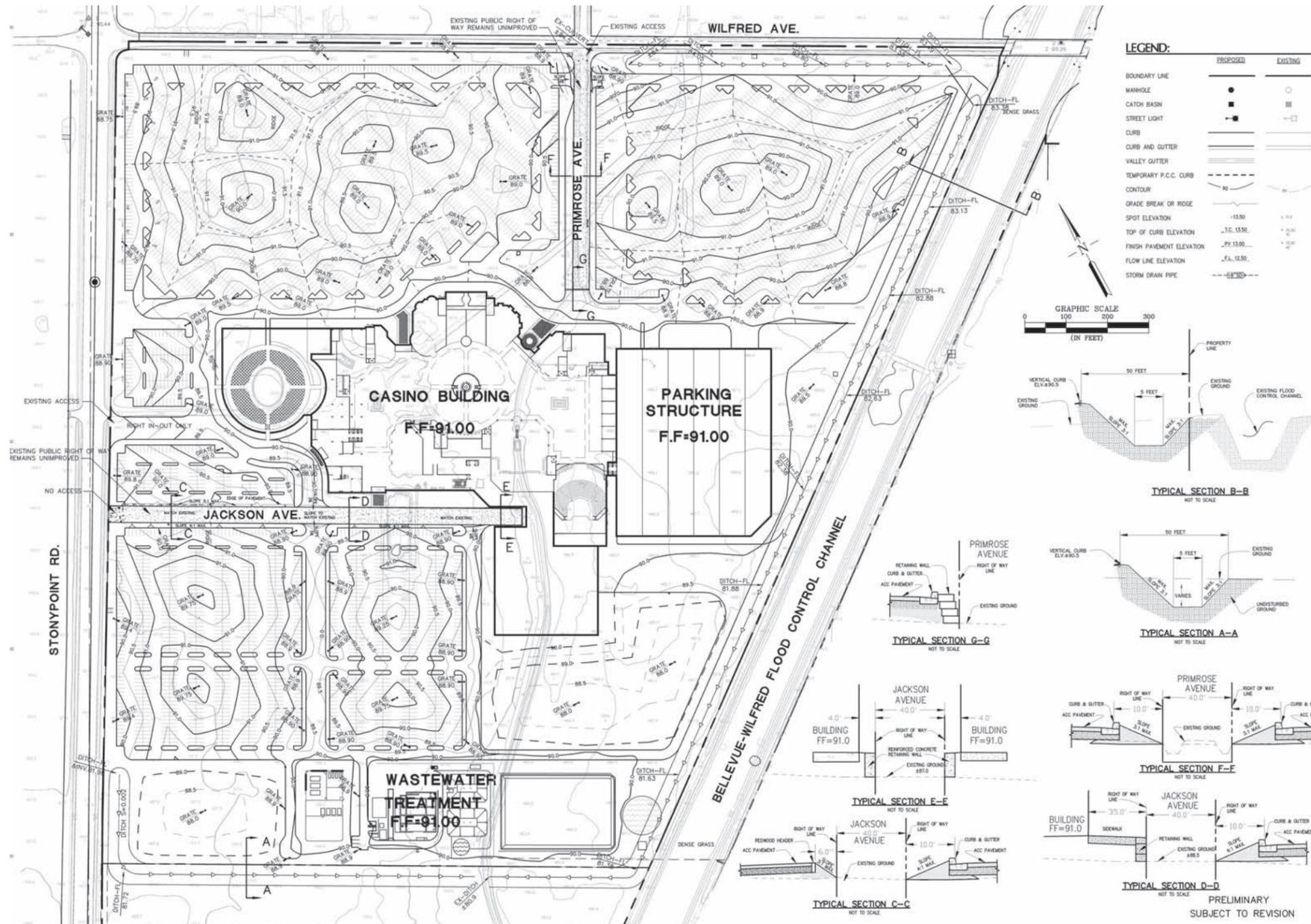
2.3.7 WASTEWATER TREATMENT AND DISPOSAL

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. As shown in **Table 2-2**, wastewater disposal would take place by one of the following two options.



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

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Figure 2-11

Alternative B, D, and E – Grading/Drainage Plan – Stormwater Detention / Floodplain Storage

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. Please see **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation.

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 toilet 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.

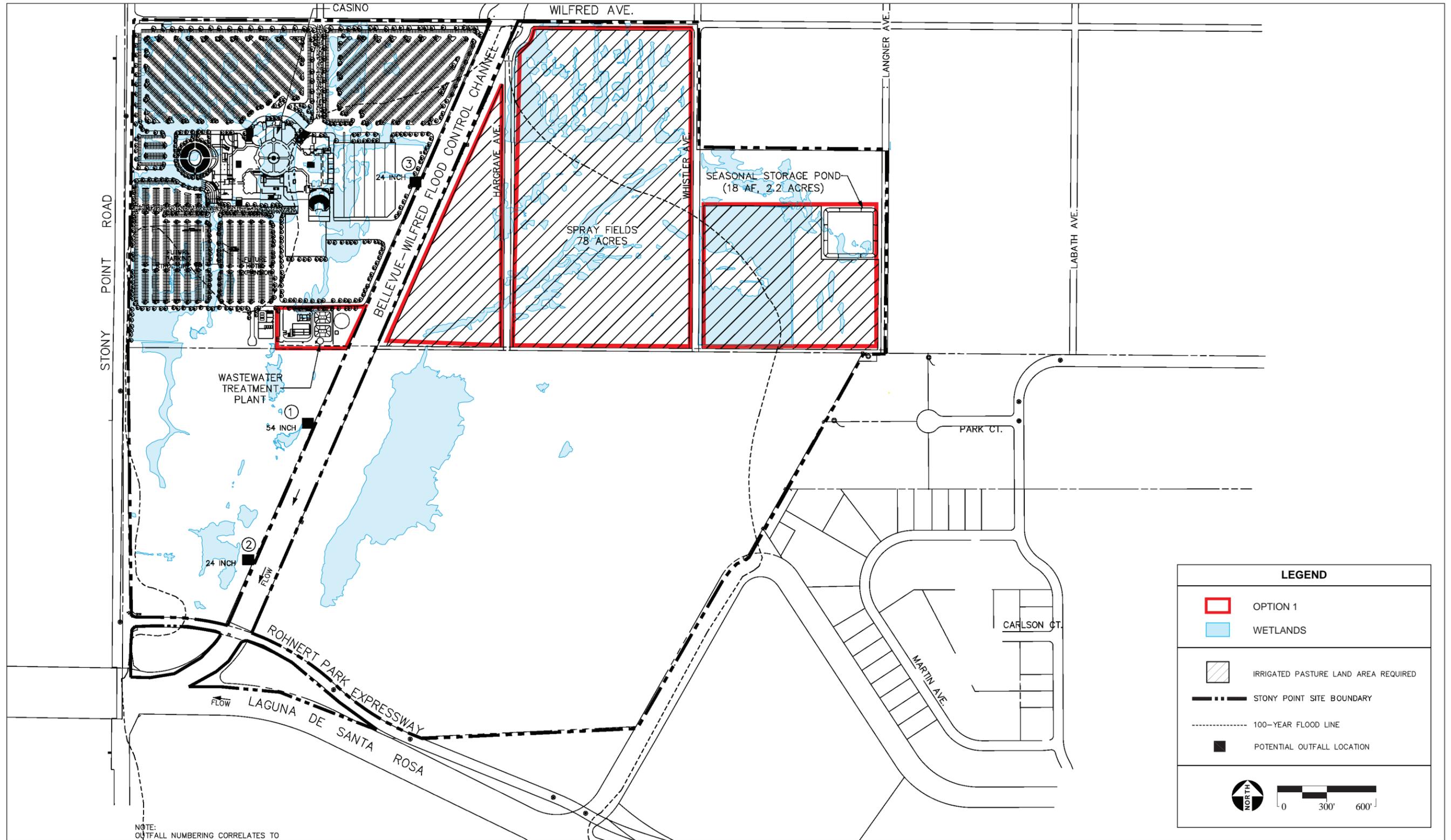


Figure 2-12
Alternative B – Water / Wastewater Facilities (Option 1)

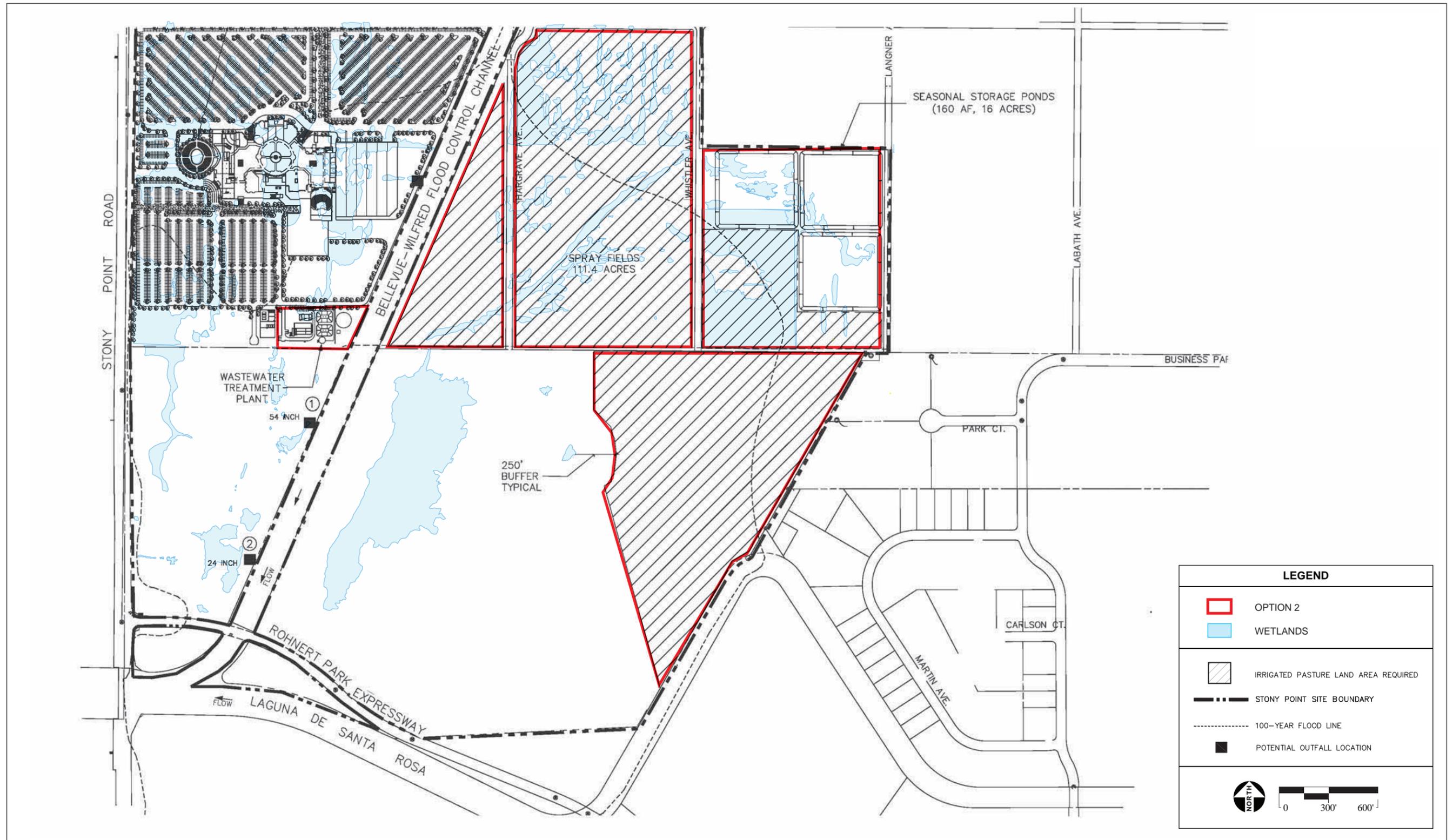


Figure 2-13
Alternative B – Water / Wastewater Facilities (Option 2)

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 that 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.

2.4.1 MANAGEMENT CONTRACT

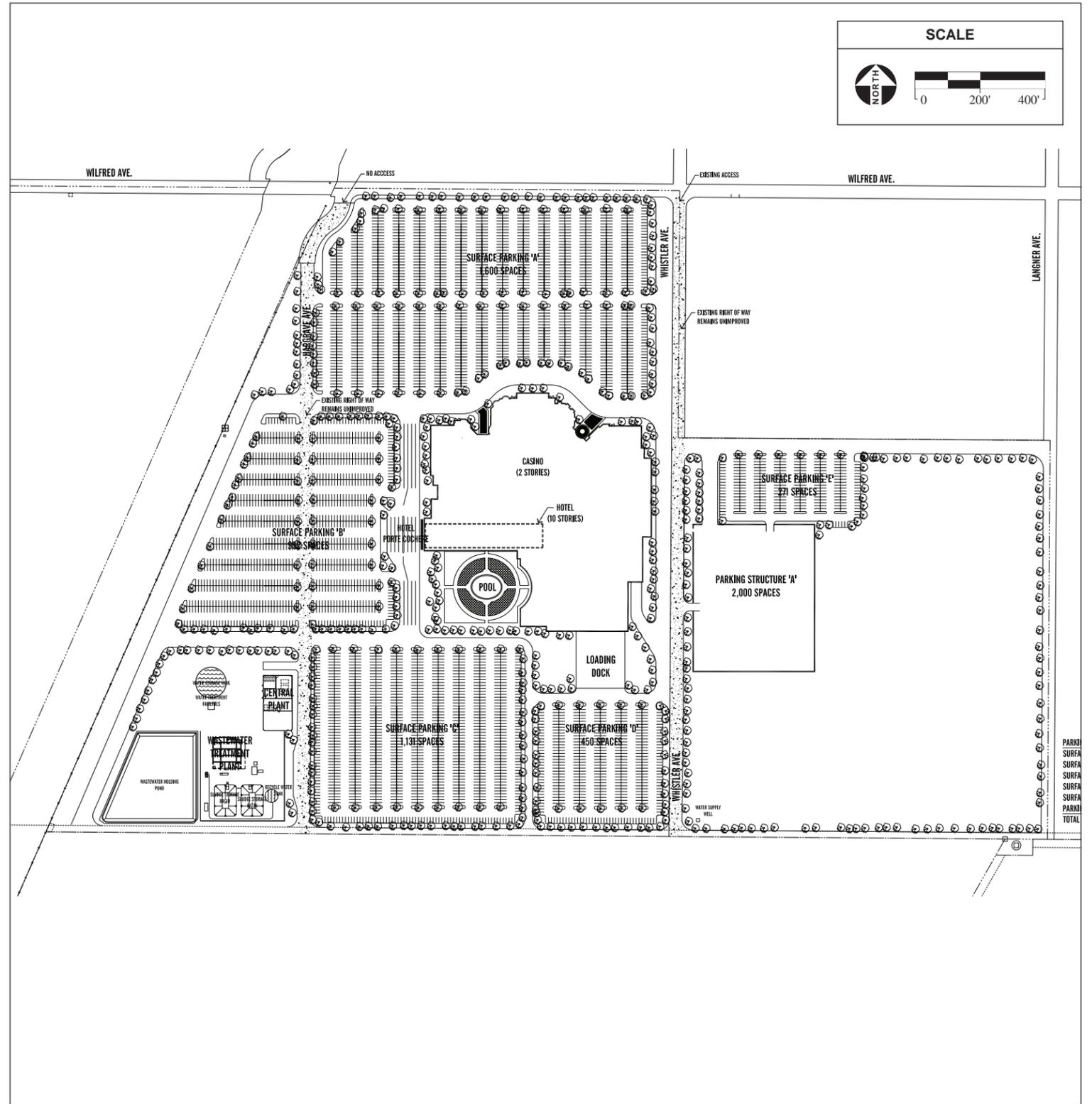
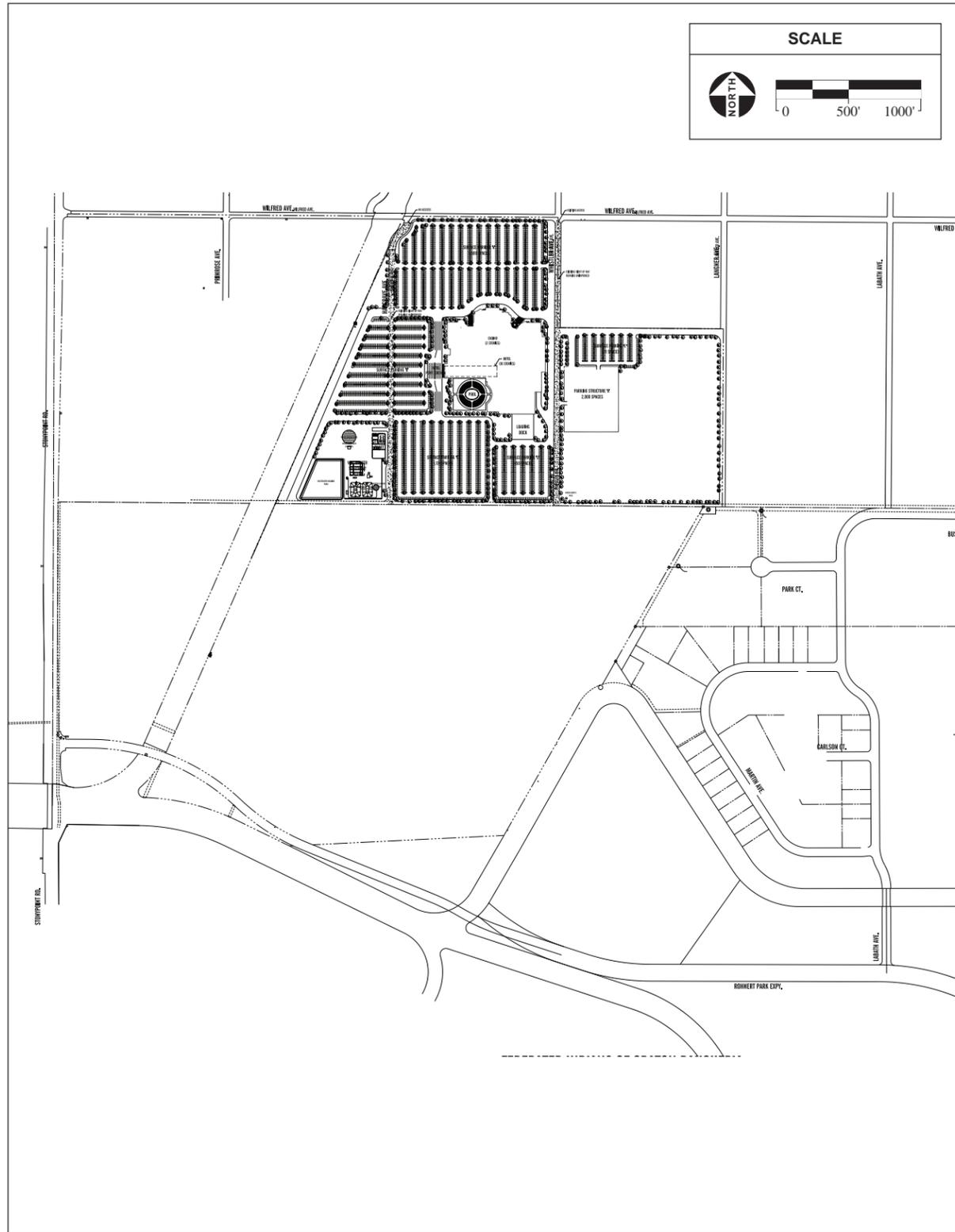
As with Alternative A, Alternative C would require NIGC approval of a management contract between the Tribe and SC Sonoma Management or its affiliates before gaming could take place on the Northeast Stony Point Site (see **Section 2.2.1**).

2.4.2 CASINO AND RELATED AMENITIES

The design and components of the casino facility would be 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

2.4.3 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.

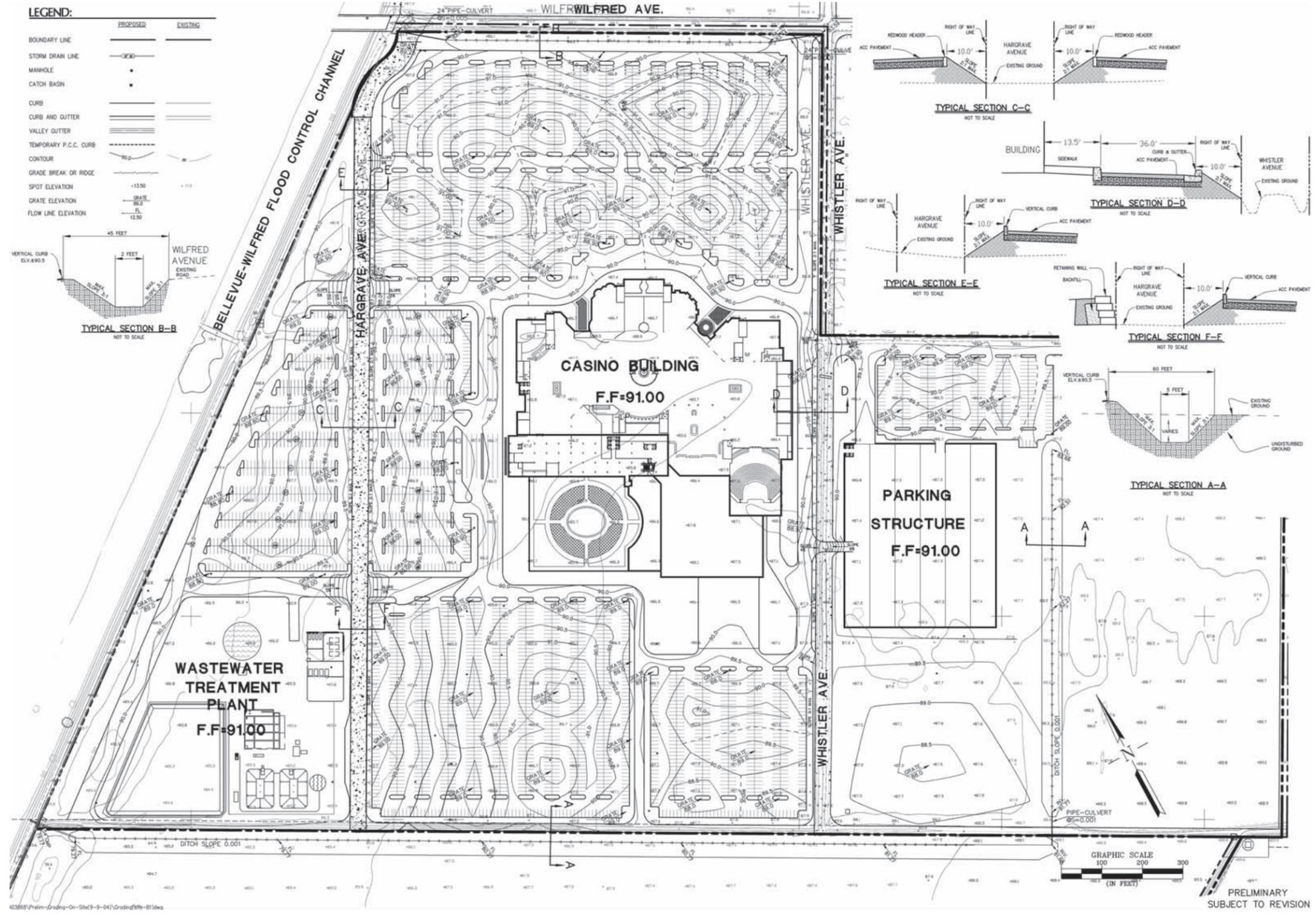
2.4.5 CONSTRUCTION

Alternative C would be constructed after the Stony Point Site has been placed into Federal trust. 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. 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**). 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.





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

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Figure 2-16

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

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.

As shown in **Table 2-2**, wastewater disposal would take place by one of the following two options.

OPTION 1

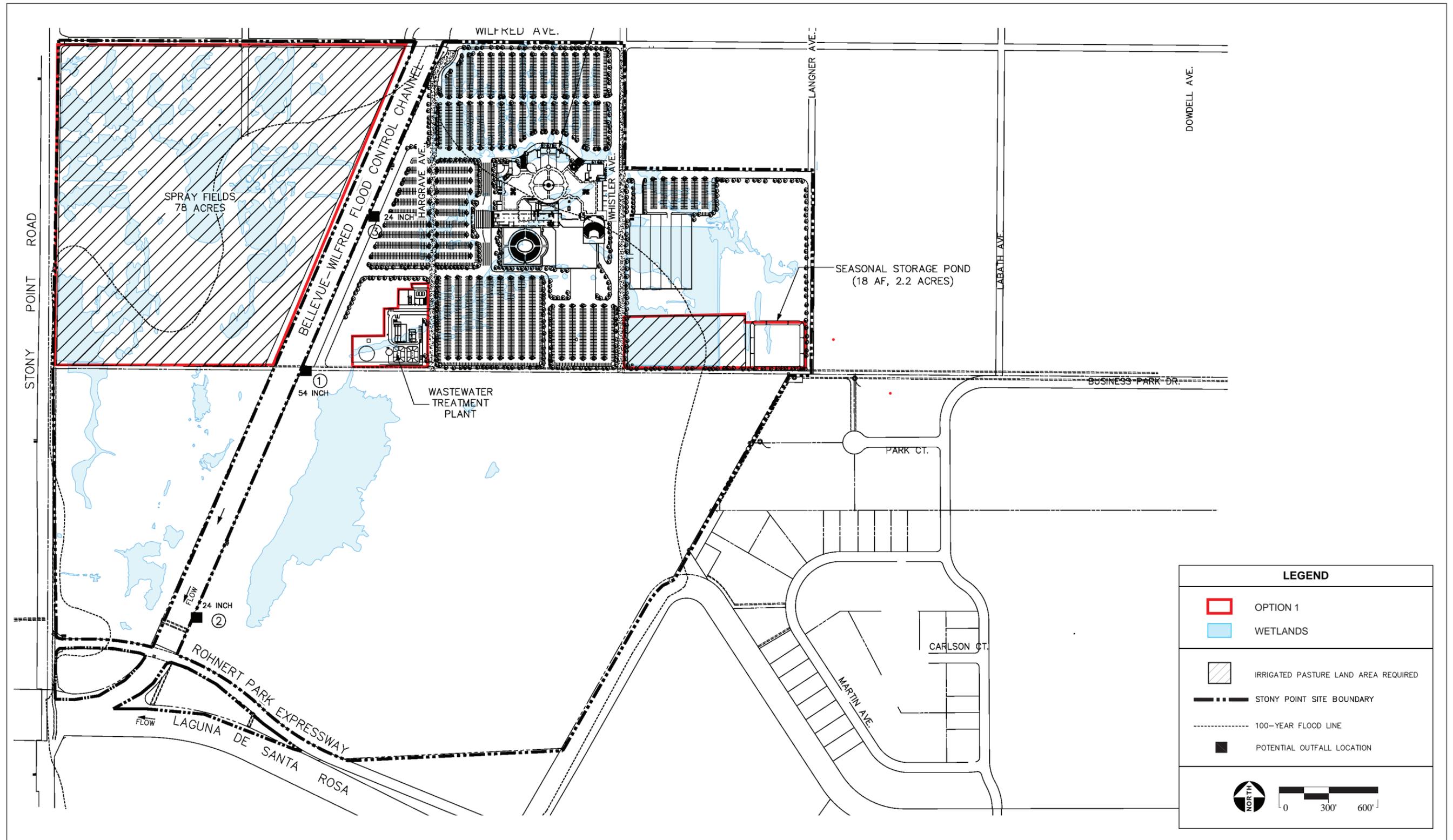
Presented in **Figure 2-17**, the first option assumes all effluent will be disposed of through sprayfields in the northwest quadrant of the Stony Point Site from April to October, but water produced during the wet season will be disposed of in the Laguna de Santa Rosa via the Bellevue-Wilfred Channel. 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. Please see **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation.

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.



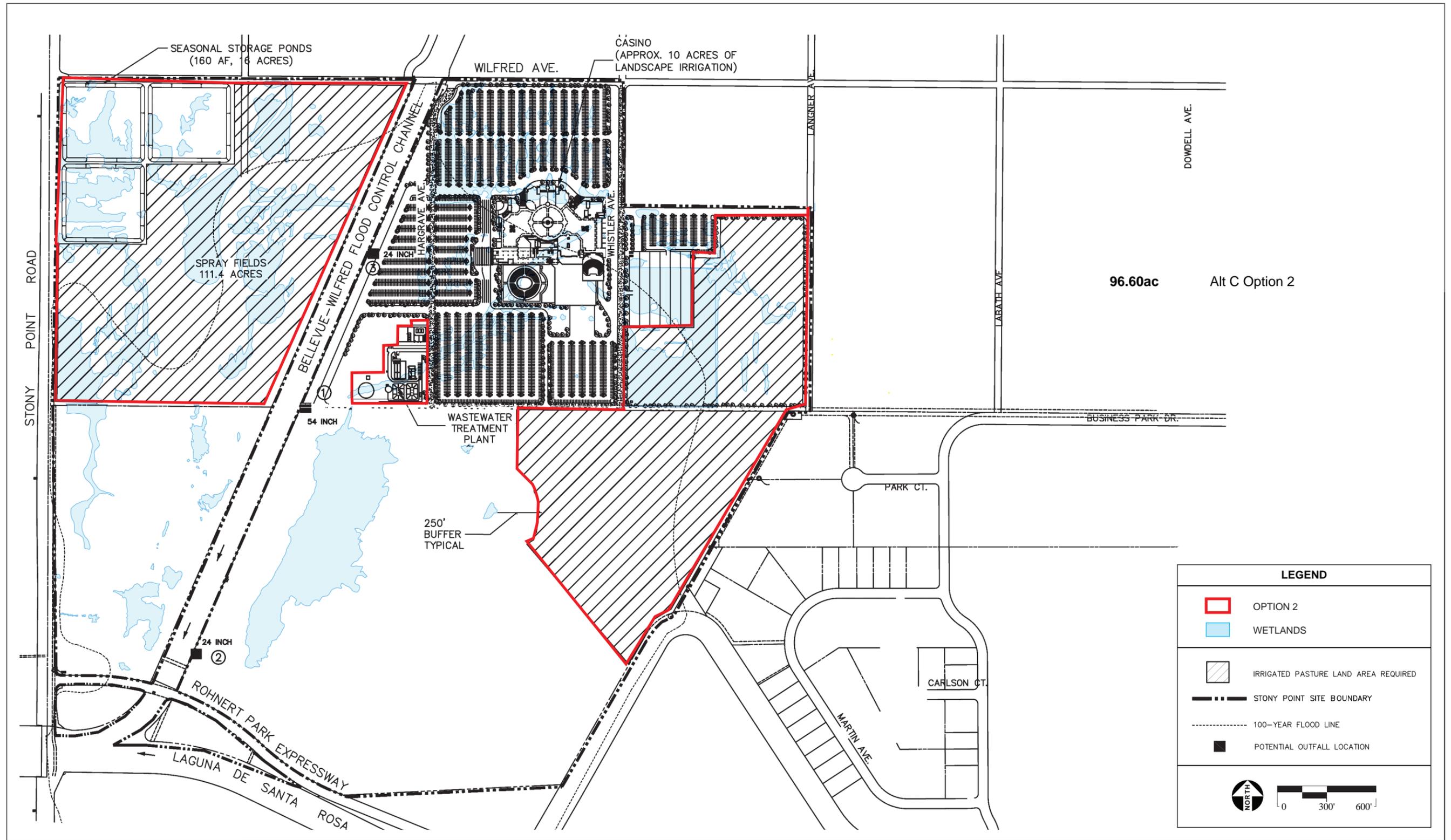


Figure 2-18
Alternative C – Water / Wastewater Facilities (Option 2)

As with Alternative A, recycled water would be utilized for toilet 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

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 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 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 (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 above in **Table 2-3**. 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. 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**.

TABLE 2-3
ALTERNATIVE D – 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.

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. 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**). 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.

2.5.7 WASTEWATER TREATMENT AND DISPOSAL

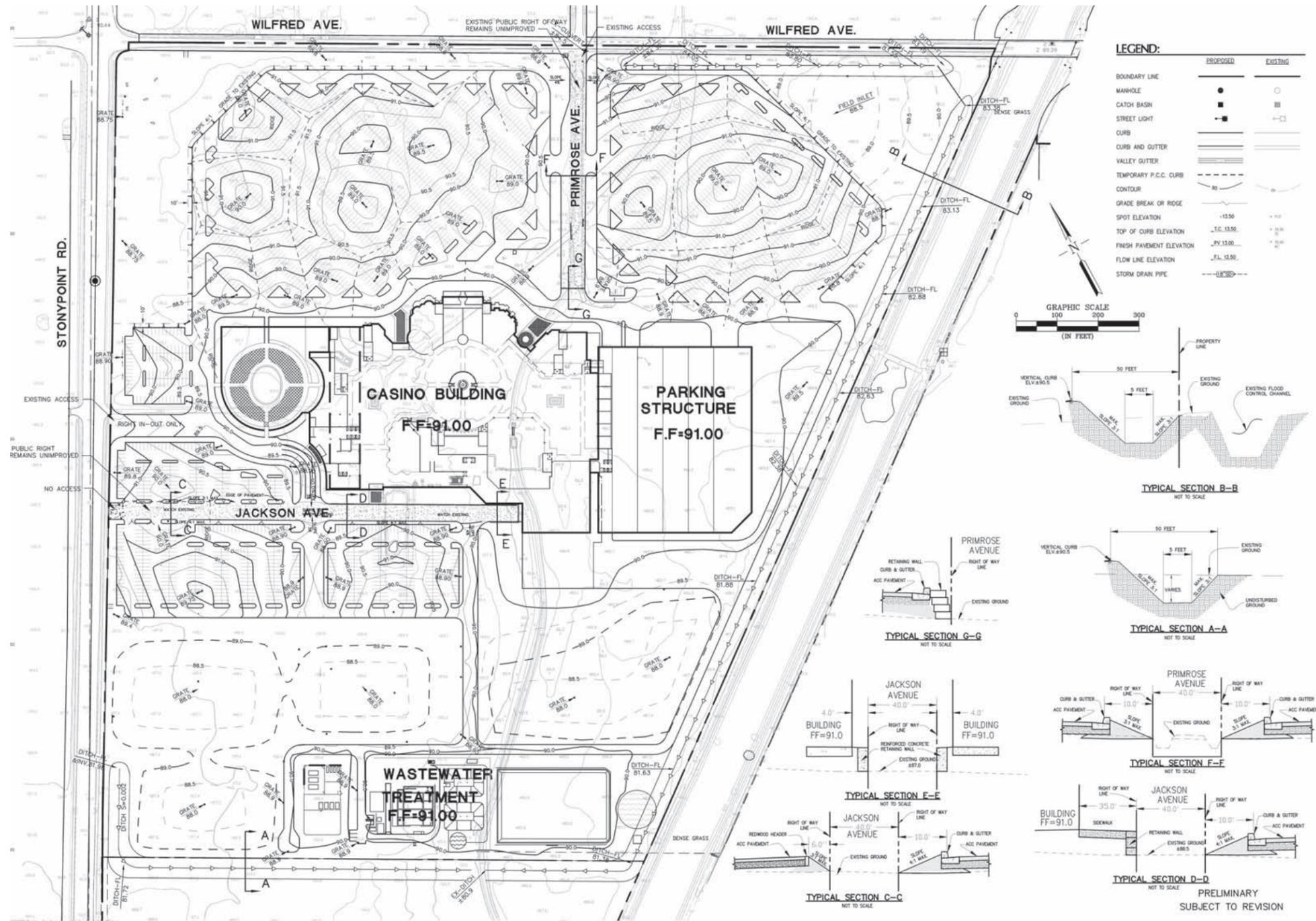
Wastewater treatment and disposal for Alternative D would be provided by one of two on-site options. The wastewater treatment facility planned for Alternative D would be the same as that proposed for Alternative A, except that it would be designed for lower flows consistent with Alternative D's reduced intensity program. 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 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. 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. See **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 15% factor of safety.



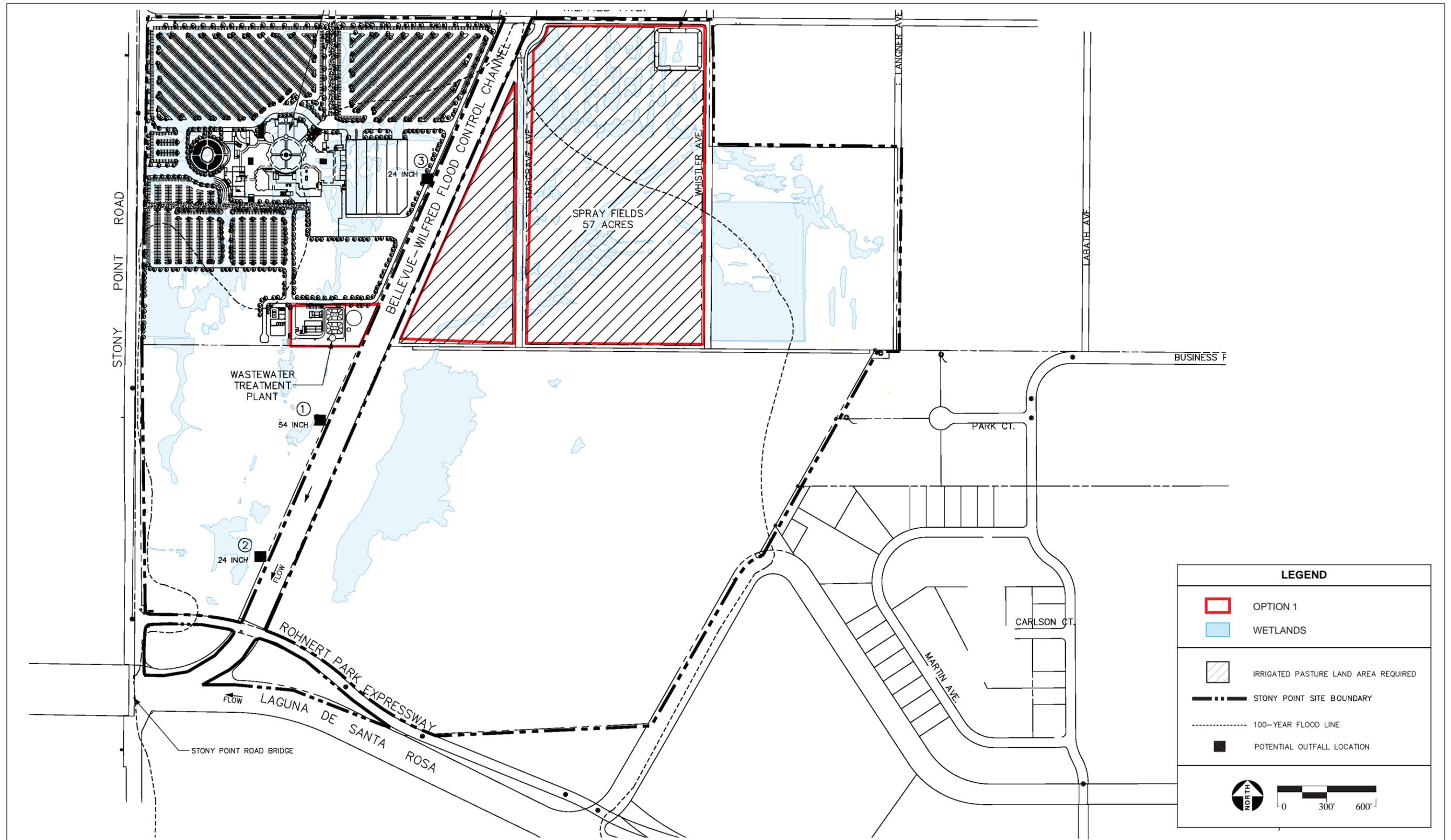
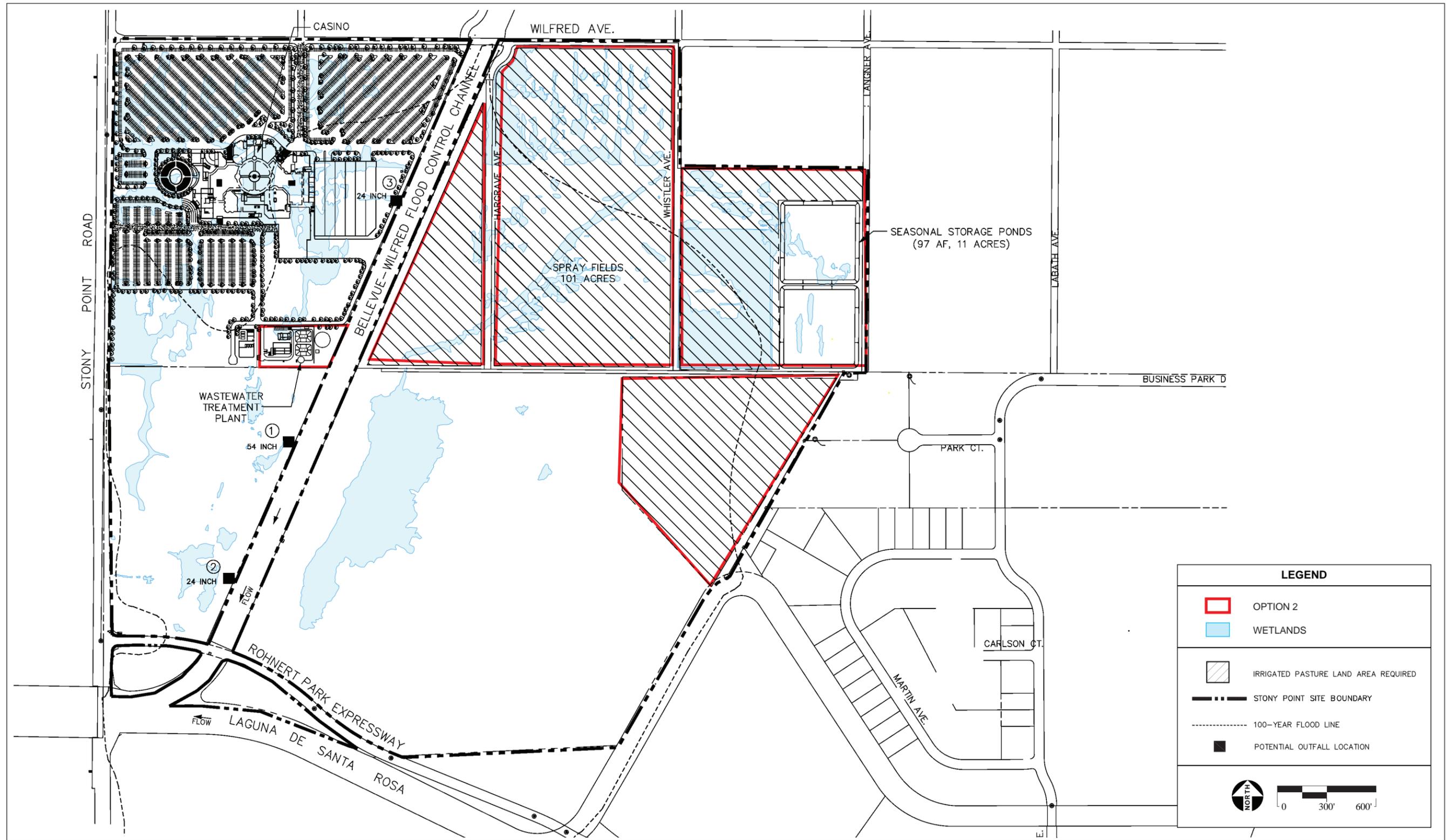


Figure 2-21
Alternative D – Water / Wastewater Facilities (Option 1)



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

Graton Rancheria Casino and Hotel EIS / 203523 ■

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

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 with 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 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.

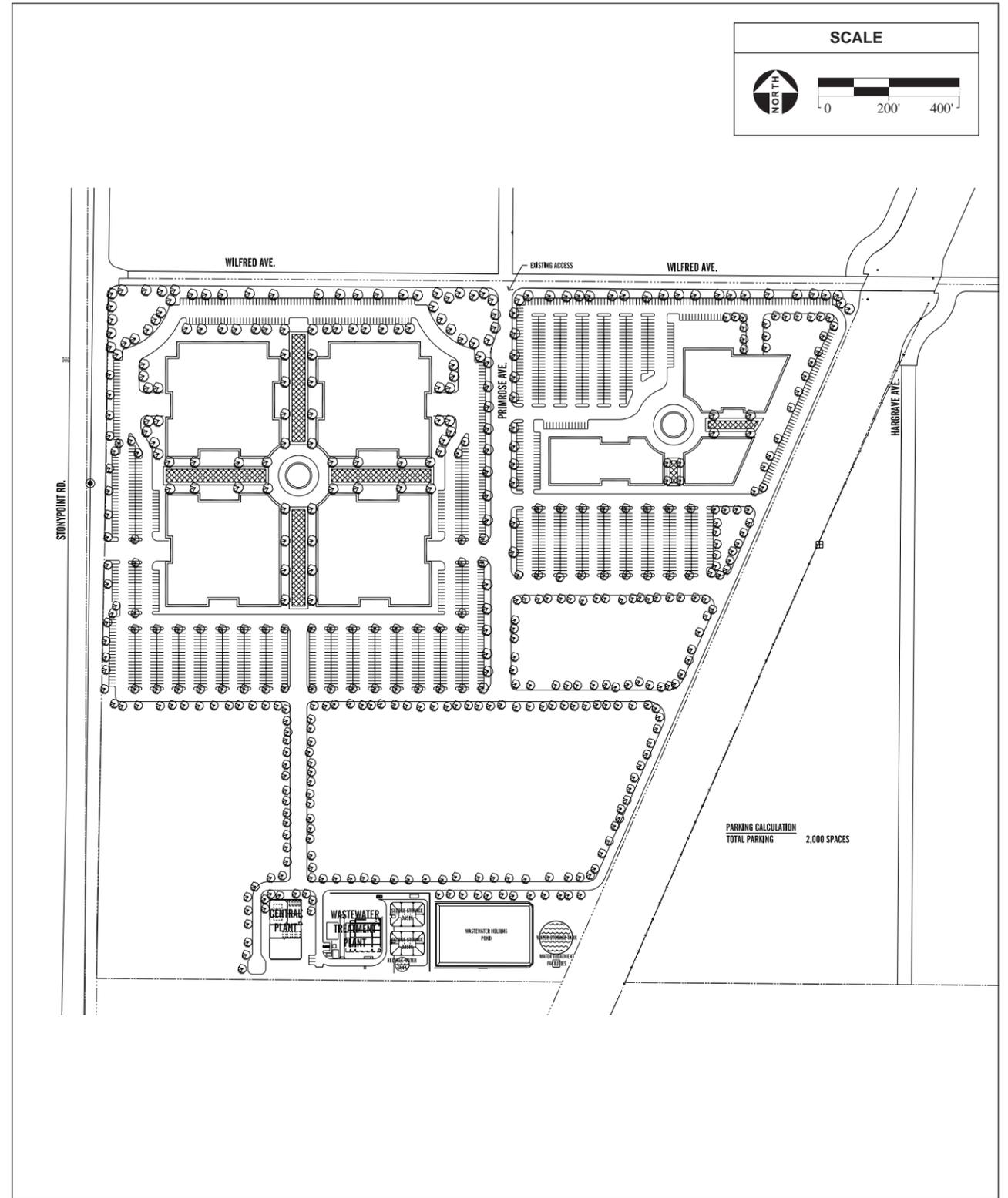
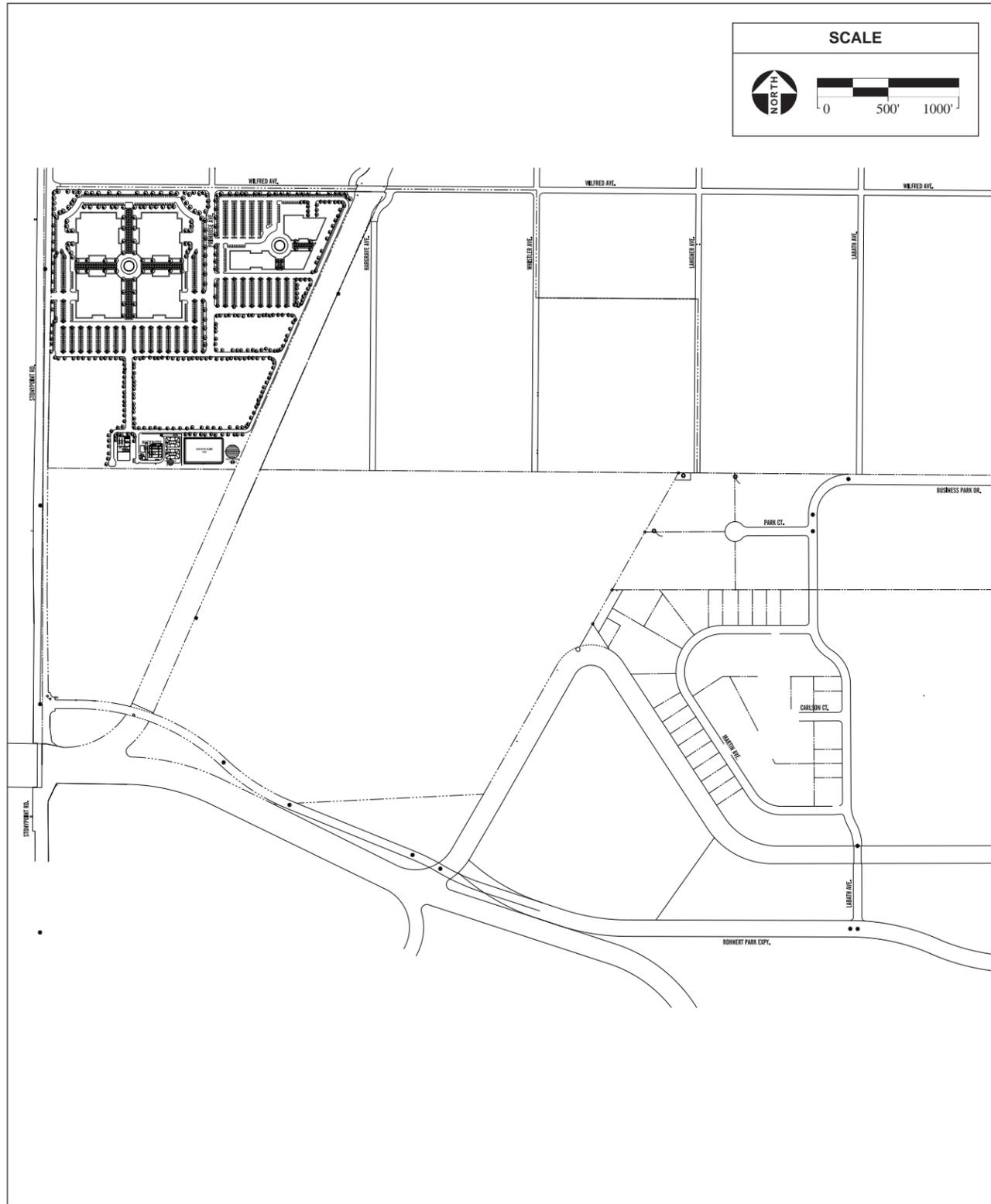
2.6 ALTERNATIVE E – BUSINESS PARK

Alternative E consists of the development of an approximately 500,000-square-foot business park on the northwest corner of the Stony Point Site. **Table 2-4** details the square footage of each project component. **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 reasonable range of 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 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**.

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.



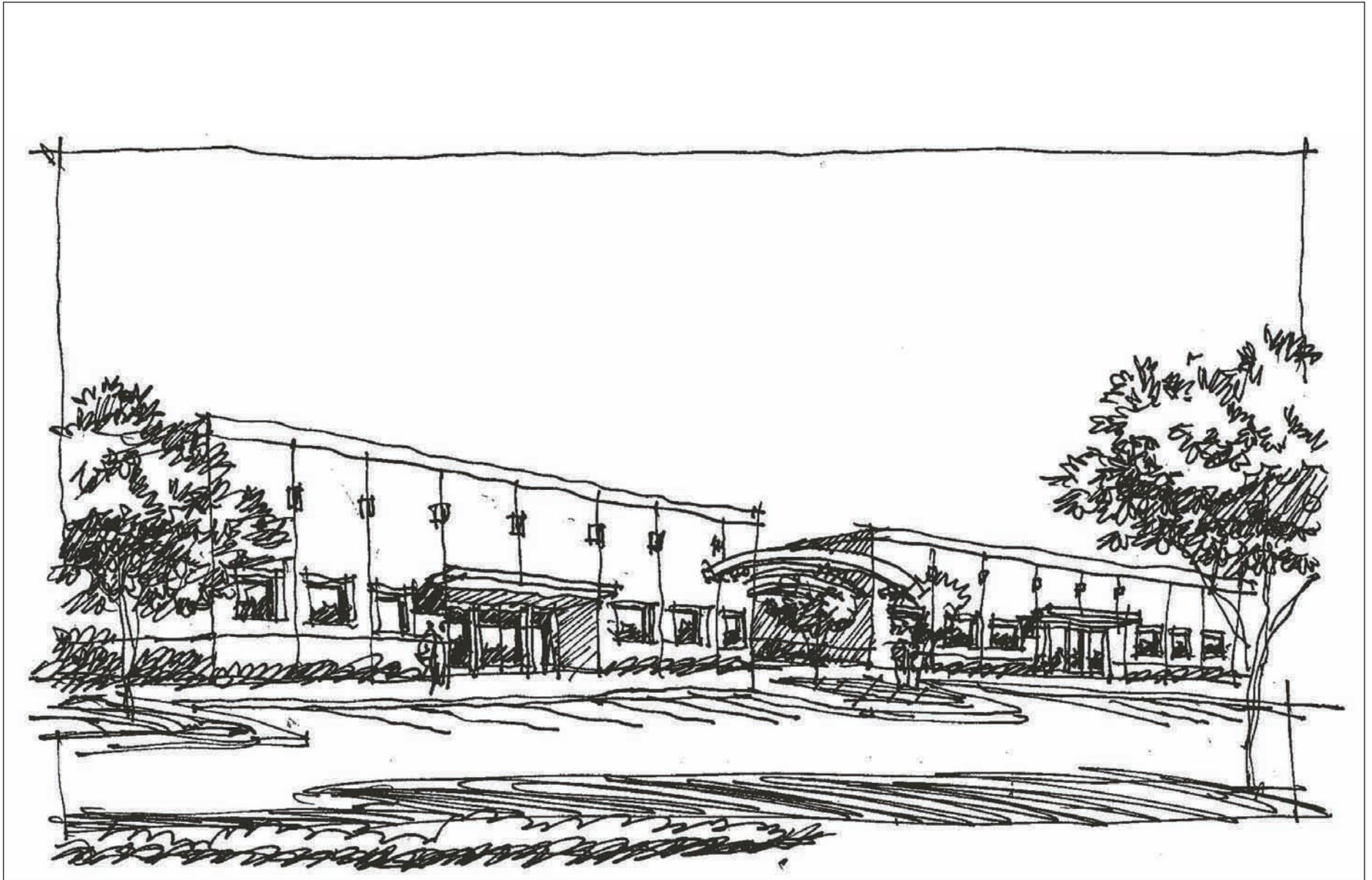


TABLE 2-4
ALTERNATIVE E – BUSINESS PARK ALTERNATIVE COMPONENTS

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

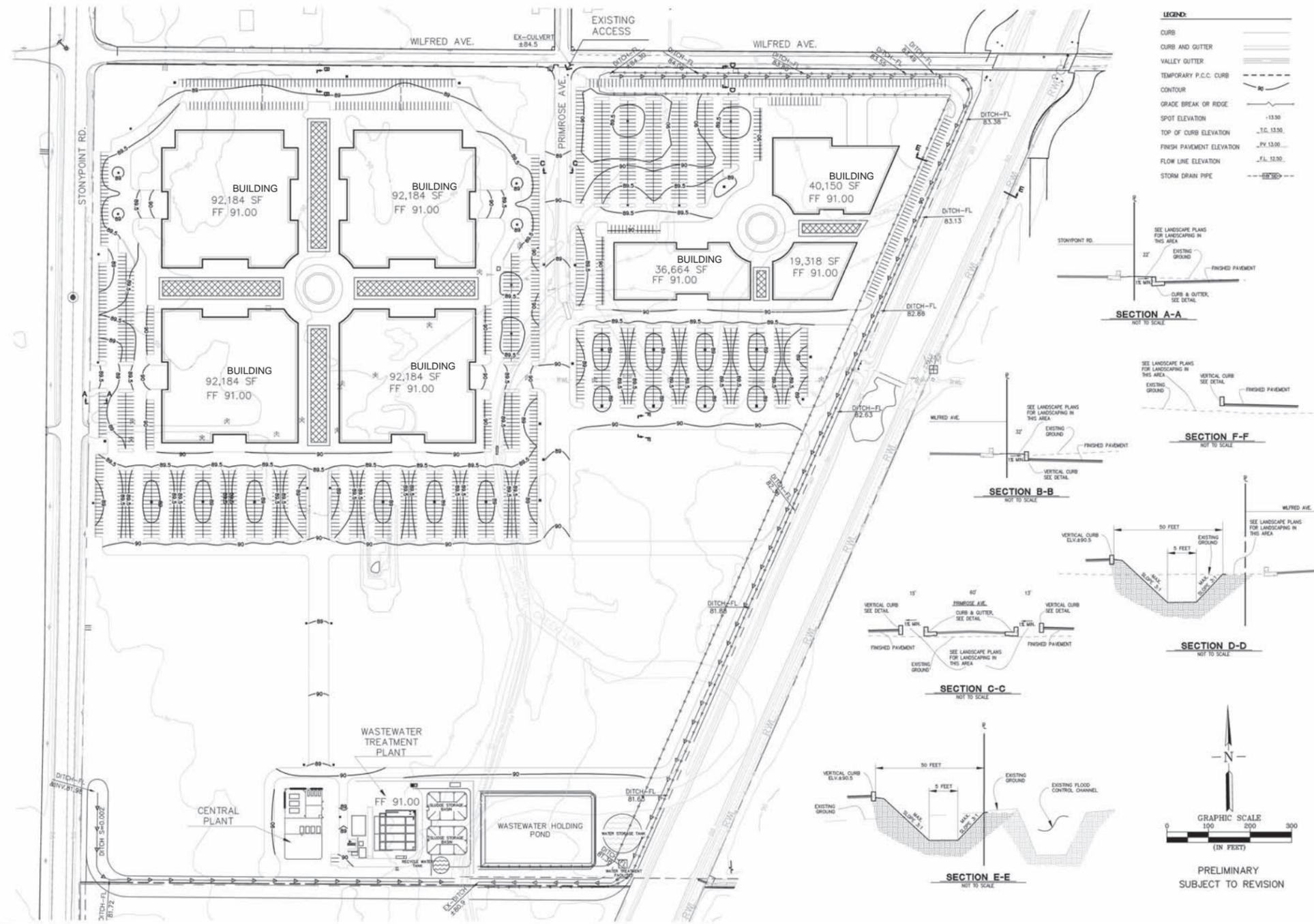
A total of 2,000 surface parking spaces is planned to serve both employees and visitors.

2.6.3 CONSTRUCTION

Construction 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. 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**). 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.



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. 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. 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. 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 15% factor of safety.

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

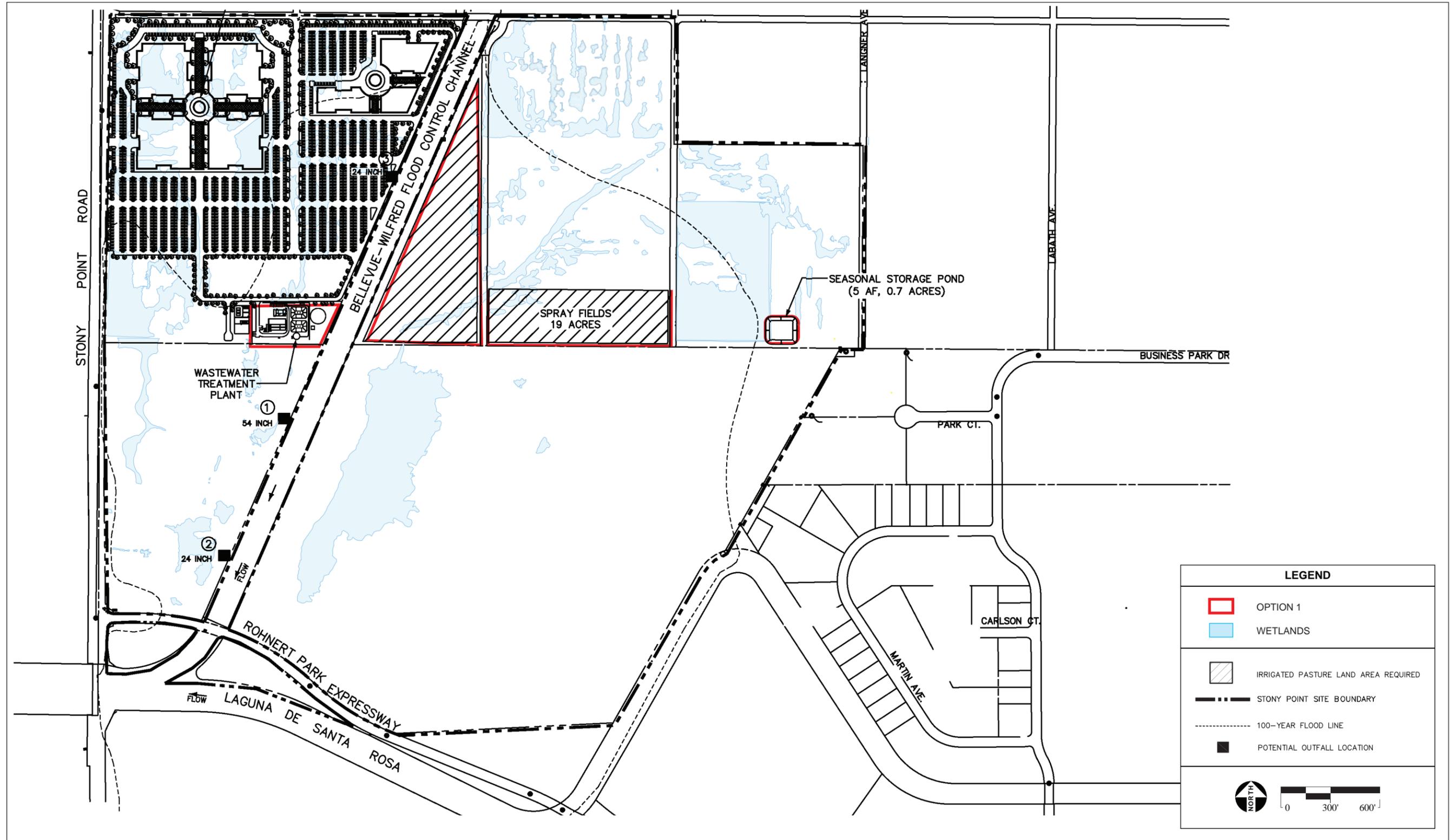
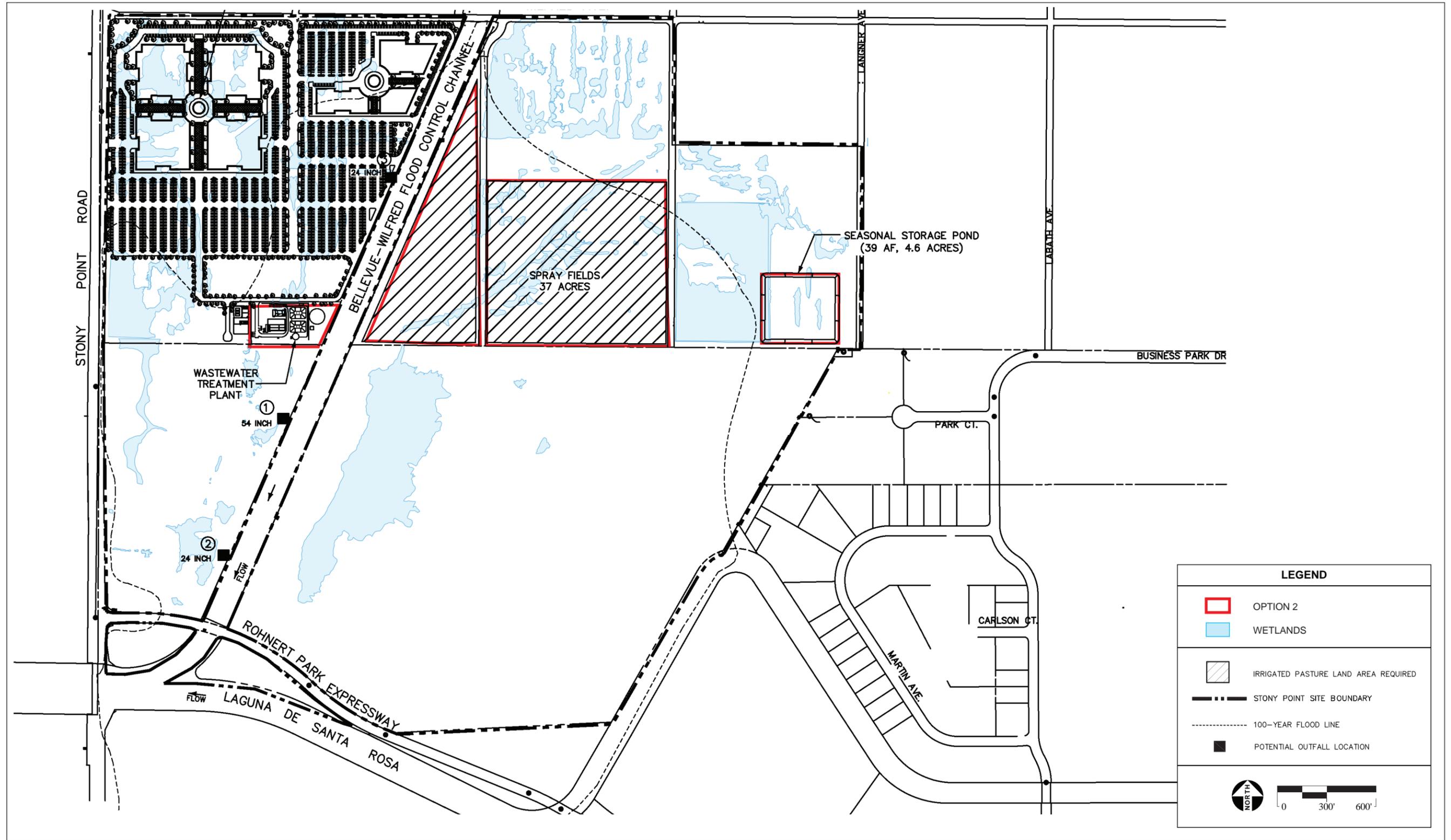


Figure 2-26
Alternative E – Water / Wastewater Facilities (Option 1)



water supply requirement for a project well is 50 gpm, nonetheless HydroScience 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 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 (except for those that are specific to a hotel or casino development).

2.6.7 FUEL STORAGE

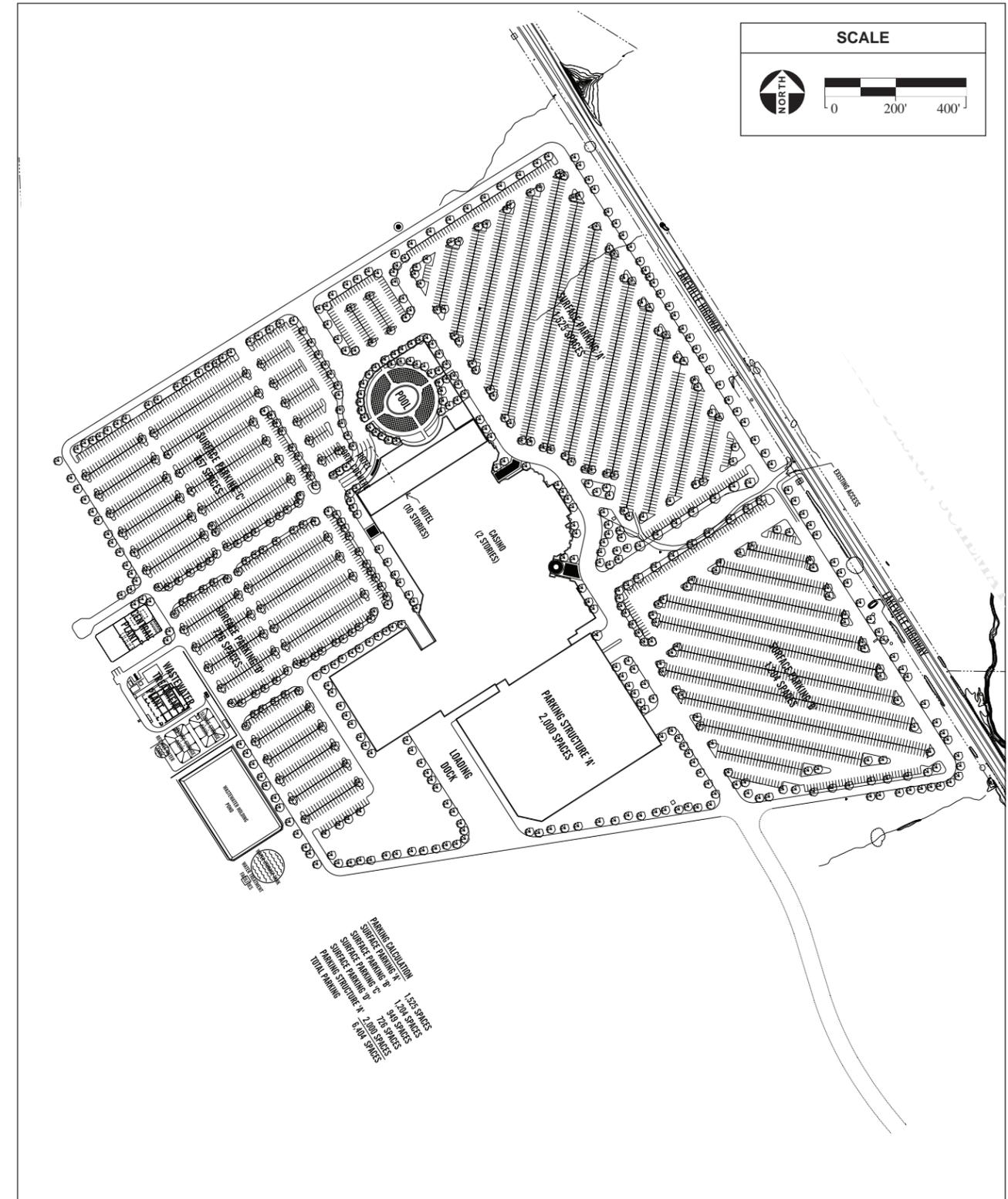
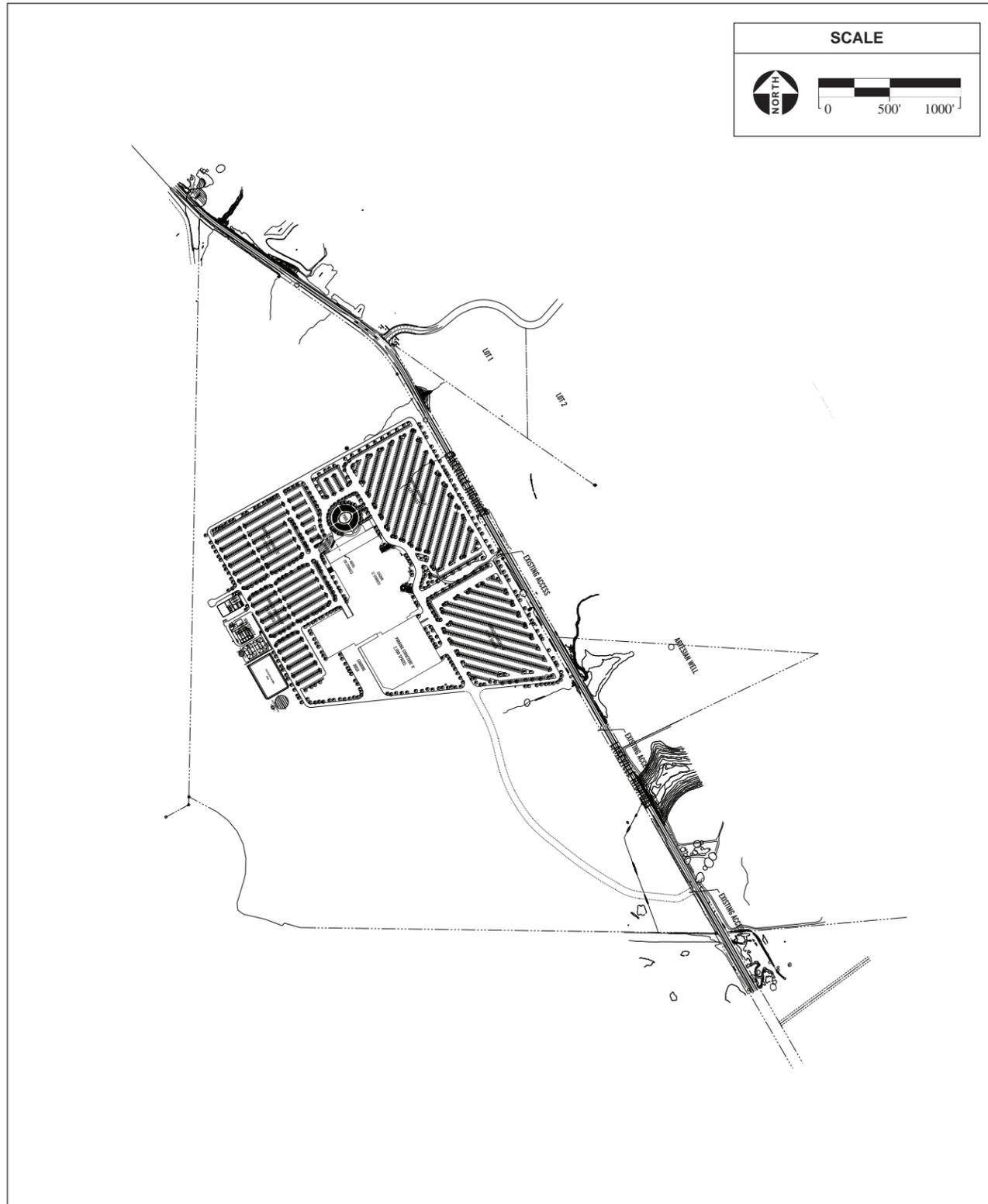
Fuel storage requirements would be similar, although reduced in size, when compared to those proposed in **Section 2.3.9** for Alternative B. Fuel storage practices would be the same as those proposed for Alternative B.

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.

2.7 ALTERNATIVE F – LAKEVILLE CASINO

Alternative F consists of the development of a casino-hotel resort in 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**. The only differences would be the location of the resort on an alternative site in southern Sonoma County and 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**).

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. 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**.

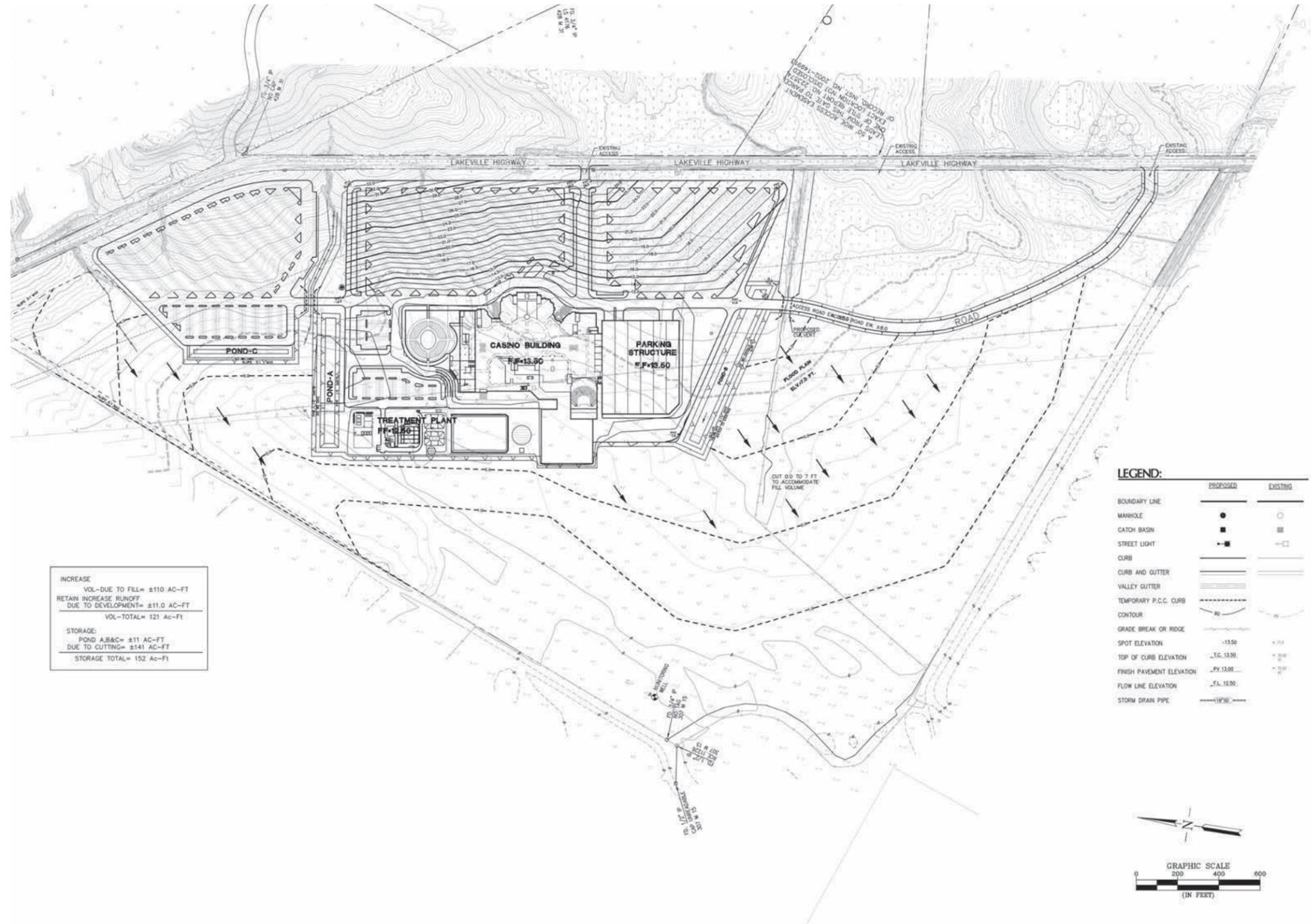
2.7.6 DRAINAGE

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. 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”) that 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 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. All proposed facilities would be constructed above the 100-year floodplain elevation. 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 wastewater treatment facility is presented in **Figures 2-30** and **2-31**. 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. 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. See **Section 2.2.7** for further details regarding the wastewater treatment plant design and operation.

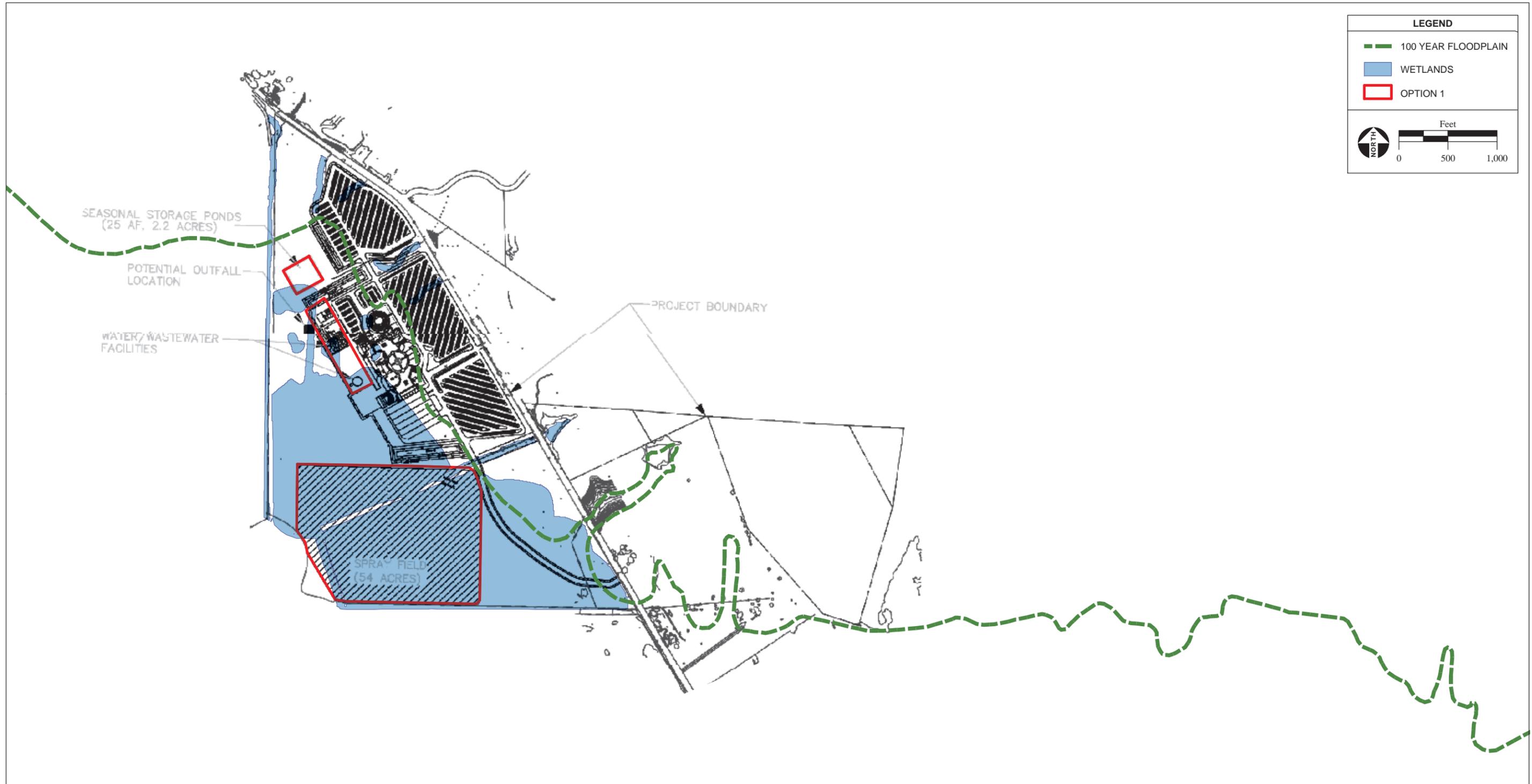
2.7.8 WATER SUPPLY

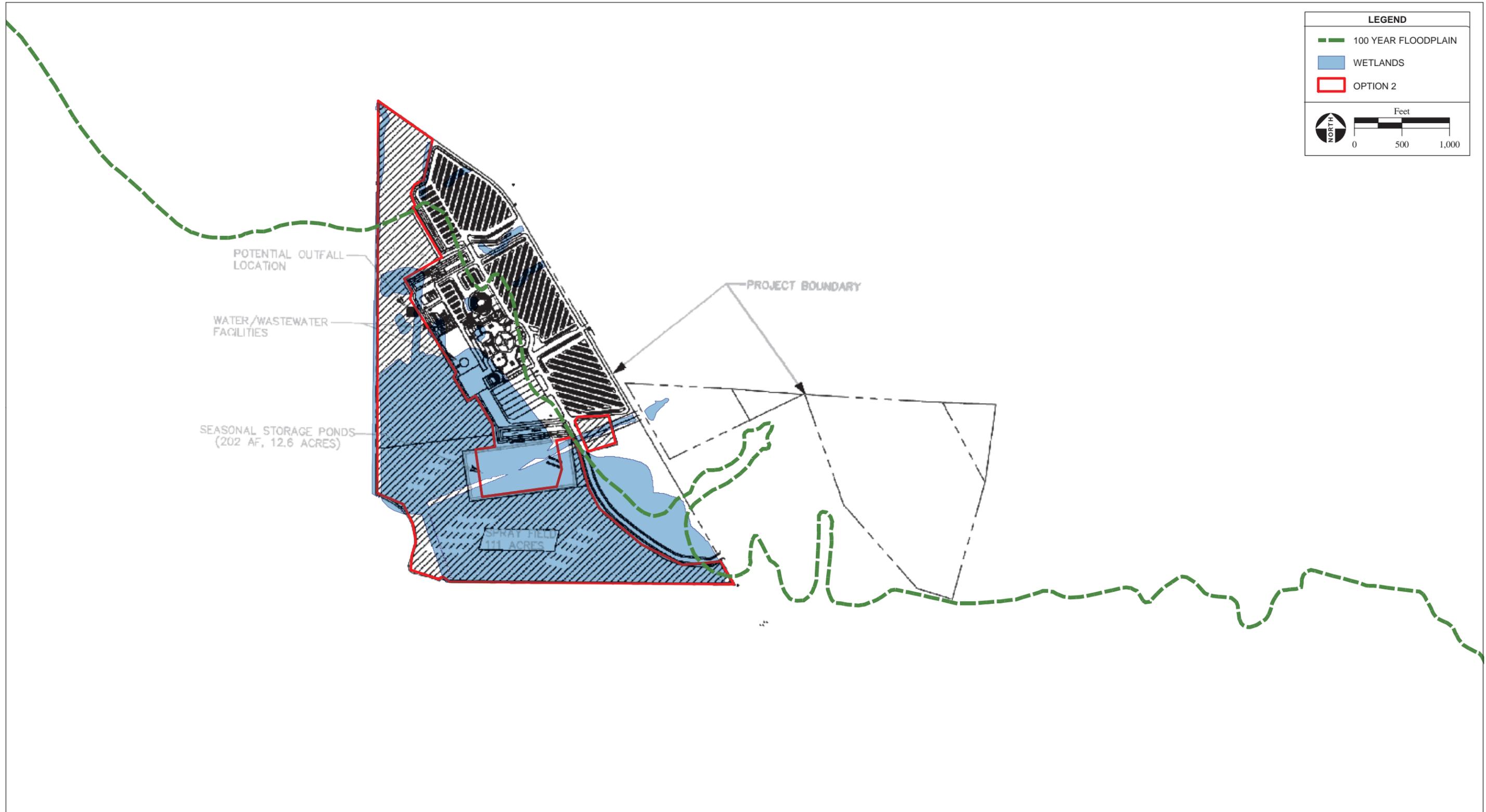
As with Alternative A, water for domestic use, emergency supply, and fire protection would be provided by on-site wells. Elements of the proposed on-site water facilities include two on-site wells, an iron and manganese treatment plant, a steel water storage tank, and a water distribution pump system.

As with Alternative A, recycled water would be utilized for toilet 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.

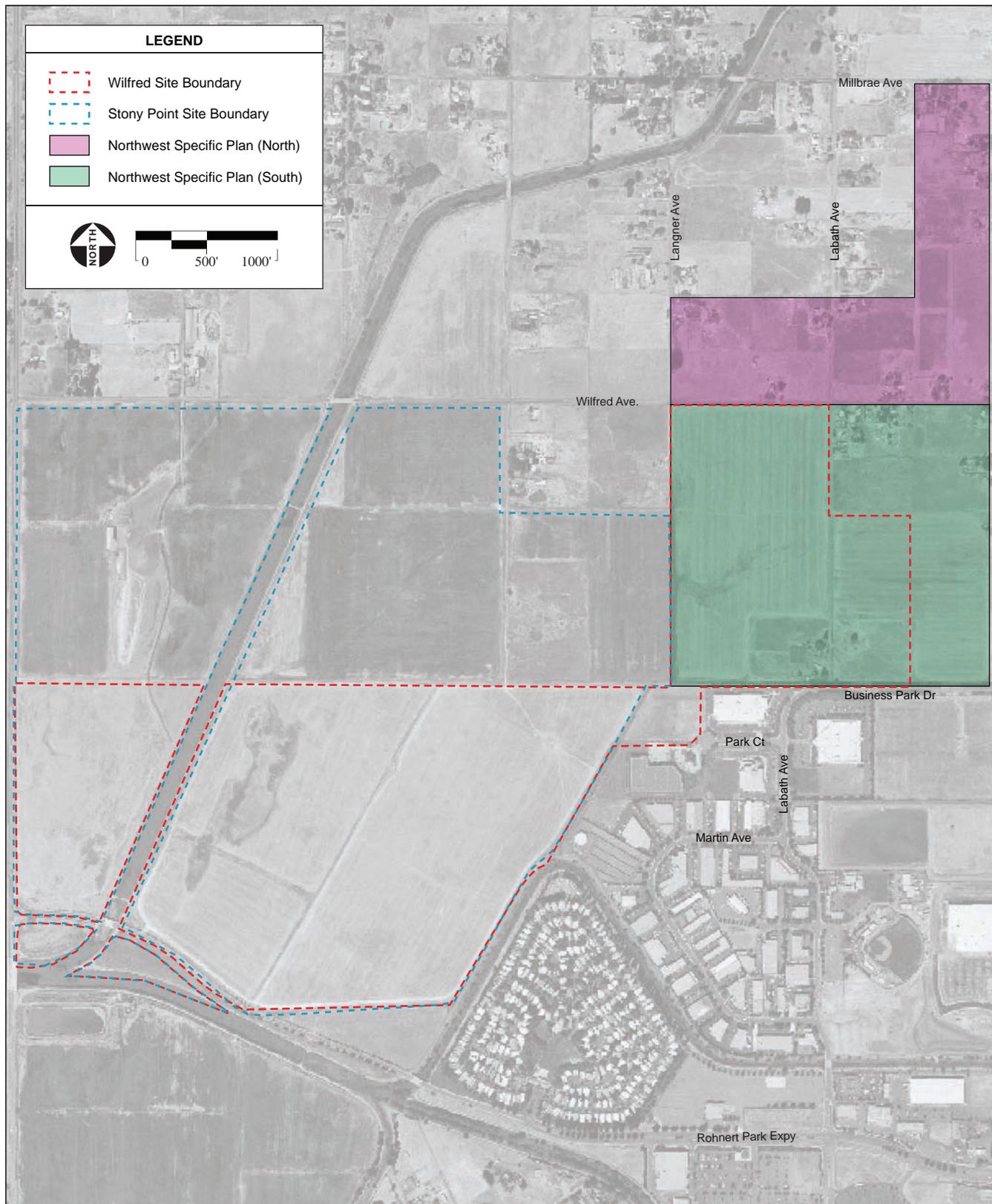
A portion of the Wilfred Site, however, overlaps with a specific plan recently prepared by the City of Rohnert Park (**Figure 2-32**). In the event that Alternative A is not developed, the area of overlap would likely be subject to the program of development set forth in the Northwest Specific Plan Southern 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 Southern Specific Plan was prepared by the City of Rohnert Park in 2004 as an extension of the General Plan. The Southern Specific Plan was designed to ensure planned build-out of the area that is consistent with and responsive to the community and the vision of the General Plan. Elements of the Northwest Specific Plan (NWSP) include Land Use, Circulation, Public Services, Design Guidelines, and Implementation.

LAND USE

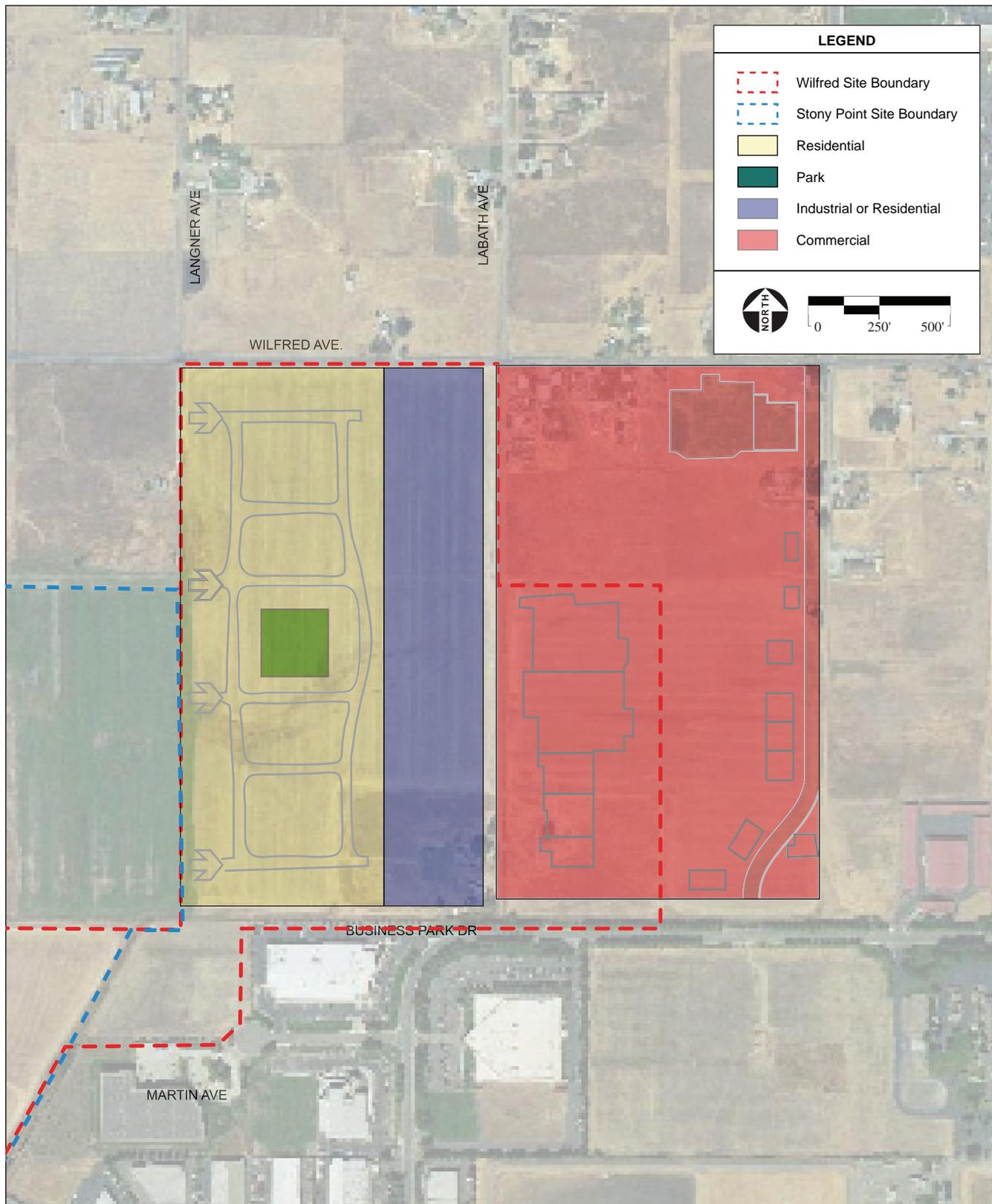
The Land Use Element of the Southern Specific Plan prescribes a development pattern and allocation of land uses consisting of High Density Residential, Commercial, Industrial, and Park. **Table 2-4** identifies development entitlements for the entire area covered by the Southern Specific Plan. Development would be distributed across the Southern Specific Plan area as shown in **Figure 2-33**.



SOURCE: Aerial Photography August 2002; City of Rohnert Park, 2004; AES, 2006

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Figure 2-32
Northwest Specific Plan - Location Map



SOURCE: Aerial Photography August 2002; City of Rohnert Park, 2004; AES, 2006

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Figure 2-33
Northwest Specific Plan - Southern Area Land Use

Table 2-5 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 and personal services.

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 with 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 of Labath Creek – widening from 48 to 100 feet and deepening from 5 to 8 feet – to accommodate increased flows from the buildout 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 is currently constructing an interceptor line to carry effluent from Rohnert Park to the Laguna WWTP. The new line will supplement the 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. Current storage capacity, however, is only adequate to serve existing development. Buildout 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. It is therefore assumed that at least for the near term 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. The City projects that, through 2010, 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, investor appetite, 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.

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 and 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 was 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 based primarily 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 were 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 lack of expertise to operate such a facility. In addition, no source of startup capital was identified. Finally, the Tribe does not have the expertise to operate this type of facility.

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**. As discussed below, a seventh potential location, the Agilent Site, was later added to the list.

After selecting the Stony Point Site as the initial preferred site, the Tribe continued to search for other potential sites 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

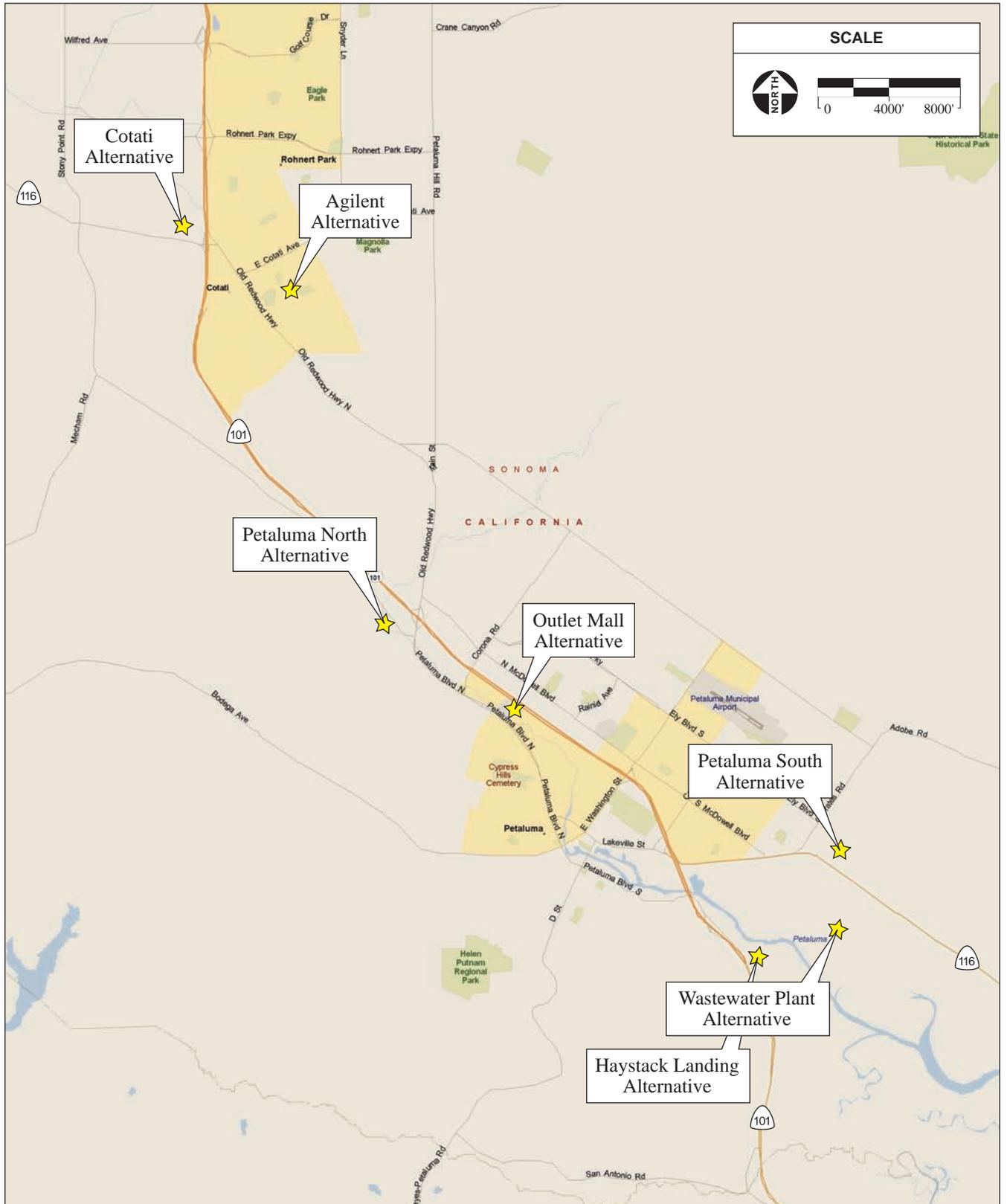


Figure 2-34
 Alternatives Eliminated from Further Consideration – Alternative Gaming Sites

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.

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.

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 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.

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. Both the City and the County voiced opposition to this location. Finally, a previous attempt by another tribe to put the land into trust failed.

PETALUMA SOUTH ALTERNATIVE

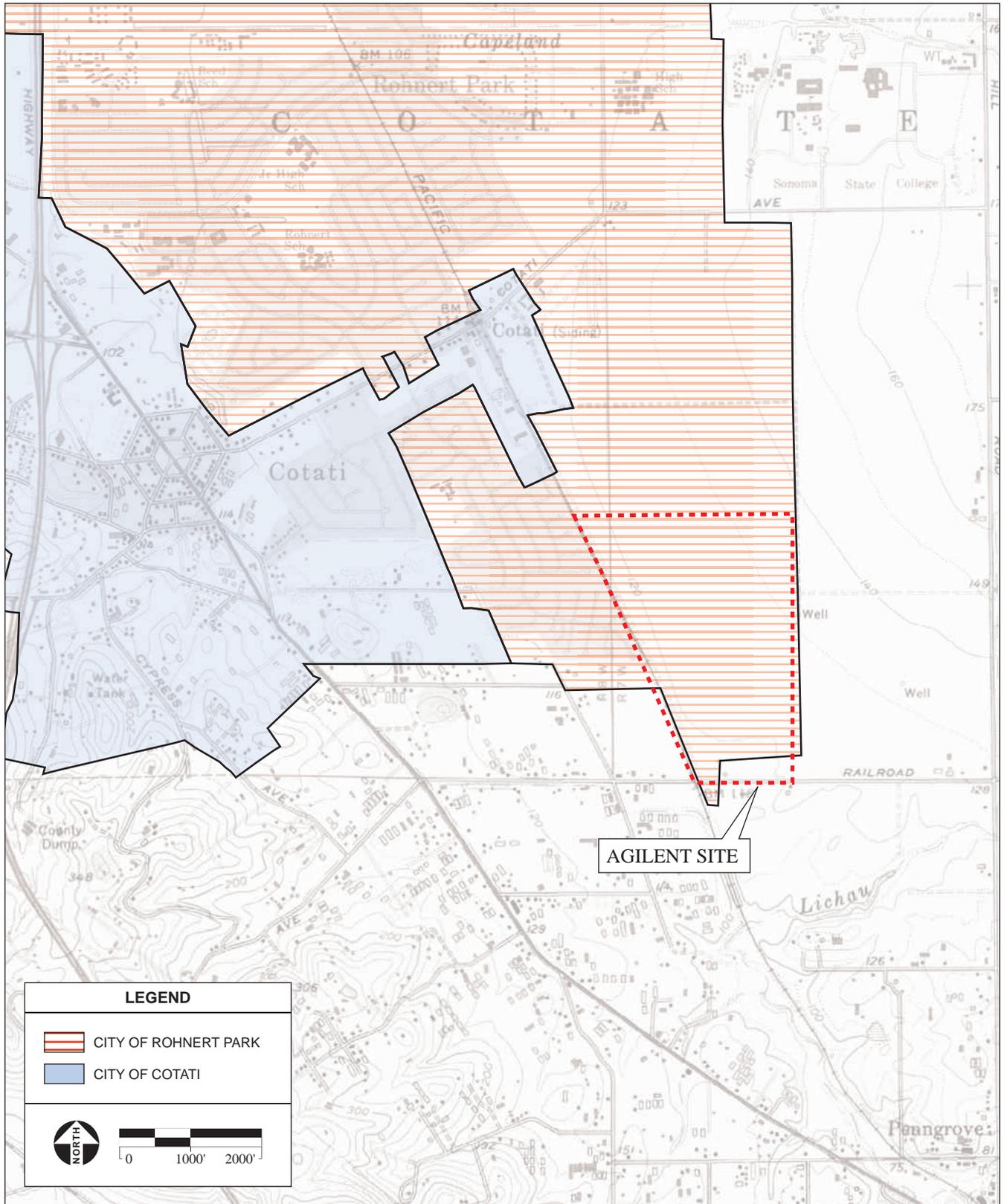
The Petaluma South Alternative consists of a 128-acre alternative site for development of a gaming facility and hotel located in the City of Petaluma. This site was not further considered for several reasons. The site is adjacent to residential neighborhoods. Existing roadways restrict access to the 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 apparently desires the property for expansion of wastewater facilities.

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 (Analytical Environmental Services, 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).



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

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Figure 2-35
Agilent Site - Site and Vicinity Map



TABLE 2-7
ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Non-Gaming Alternatives	
	<i>Alternative not given further consideration because:</i>
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	
	<i>Alternative not given further consideration because:</i>
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.

SOURCE: AES, 2006.

2.10 ADDITIONAL ALTERNATIVE

Based on comments received by cooperating agencies and at the request of the Tribe, an eighth alternative (Alternative H) will be added to the EIS analysis. Alternative H will be a reduced intensity casino alternative with the same components as the current reduced intensity alternative (Alternative D) but located on the Wilfred Site. Alternative H will not be analyzed in full at this time (a full analysis will be included in the Final EIS and will be considered by the NIGC prior to making a decision on the proposed action) for the following reasons: adding Alternative H to the analysis will be a lengthy process; no new impacts are expected to result from Alternative H (a brief discussion of expected impacts in comparison to the other alternatives is included in the Executive Summary); and it is the opinion of the NIGC that a reasonable range of alternatives (as required by NEPA) are included in the EIS without the addition of Alternative H. Nonetheless, a brief description of Alternative H is included below.

Alternative H consists of a scaled-down version of Alternative A. Alternative H 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 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

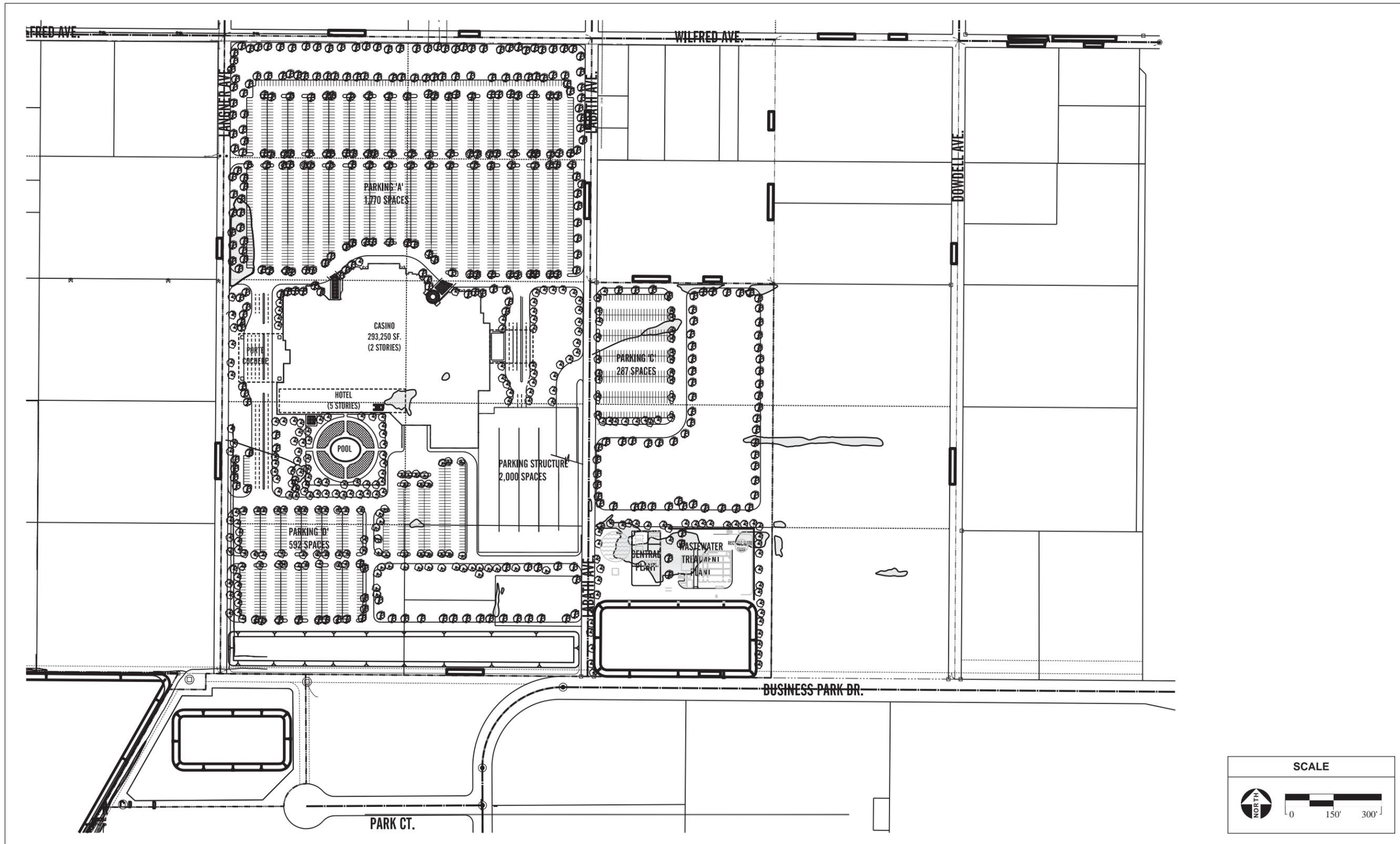
The two-story casino would consist of a mixture of uses, including: banking and administration facilities, gaming commission offices, a primary gaming area, a high-limit gaming area, and a gift shop. Numerous food and beverage outlets would be located in the facility, including: a buffet, three bars, 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**.

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 D 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 Stony Point Site has been placed into Federal trust. 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.

2.10.6 DRAINAGE

Although a drainage study has not yet been completed for Alternative H, drainage facilities would be similar to those proposed for Alternative A. 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.

A 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.

2.10.7 WASTEWATER TREATMENT AND DISPOSAL

Wastewater treatment and disposal options for Alternative H would be similar to Alternative A (see **Section 2.2.7**). Wastewater generation and treatment capacity needs would be the same as Alternative D (see **Section 2.5.7**).

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 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 utilization of recycled water would significantly reduce the water demands for the proposed project. According to the Water and Wastewater Feasibility Study (**Appendix D**), the estimated minimum water supply requirement for Alternative D is 100 gpm. The minimum water supply requirement for Alternative H is expected to be the same as Alternative D. The potable water main for Alternative H would be sized for the peak day demand. Thus, two wells (one for redundancy) with a firm water supply capacity of 150 gpm each would be constructed on the Wilfred Site.

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 technically apply to the Wilfred Site. In addition, given the reduced size and scope of the casino-hotel resort proposed for Alternative H, the terms of the MOUs with the City and County are not expected to apply to Alternative H. The agreements can be amended, however, to account for the reduced intensity of development on the Wilfred Site.