

# EXECUTIVE SUMMARY

---

## Cloverdale Rancheria of Pomo Indians Fee-to-Trust and Resort Casino Project

### ES.1 Introduction

This Final EIS has been prepared by the Bureau of Indian Affairs (BIA) to address the potential environmental effects of taking six parcels (containing approximately 64.52 gross acres) into federal trust for the Cloverdale Rancheria of Pomo Indians (Tribe) and the subsequent development of a destination resort casino. In addition to the trust acquisition for gaming purposes, the Proposed Action would include review by the National Indian Gaming Commission (NIGC) of the development and management contract between the Tribe and its management partners. The project site is located in northern Sonoma County, California within the sphere of influence of the City of Cloverdale. The project site is situated immediately east of Highway 101 and borders Asti Road. Regional access to the project site is provided by Highway 101, with local access provided by South Cloverdale Boulevard via Highway 101. The proposed trust parcels include land which overlaps and is adjacent to the Tribe's historic Rancheria location.

### ES.2 Purpose and Need

Implementation of the Proposed Action would assist the Tribe in meeting the following objectives:

- Restoring the Tribe's trust land base
- Strengthening the Tribal government
- Achieving economic self sufficiency
- Improving the socioeconomic status of the Tribe
- Providing employment opportunities for Tribal members
- Providing funding for administrative, health and welfare, housing, educational, social and other Tribal services

### ES.3 Alternatives

This document analyzes the potential environmental consequences associated with the Proposed Action, four development alternatives and the No Action Alternative. Alternative A is the Tribe's Proposed Action. The alternatives are described in detail in **Section 2.0** and are summarized below.

## **Alternative A – Proposed Action**

Alternative A consists of the fee-to-trust transfer of the project site, federal review of the development and management contract, and development of a casino, hotel, convention center, entertainment center and other ancillary facilities. A tribal government building is proposed on the south end of the project site.

## **Alternative B – Reduced Hotel and Casino**

Alternative B consists of the fee-to-trust transfer of the project site, federal review of the development and management contract, and development of a hotel, entertainment center, casino and other ancillary facilities. The casino and hotel facilities under Alternative B would be similar to those proposed for Alternative A, but would be reduced in scale. The entertainment center would be the same size as under Alternative A. Alternative B does not include a convention center component. A tribal government building is proposed on the south end of the project site.

## **Alternative C – Reduced Casino**

Alternative C consists of the fee-to-trust transfer of the project site, federal review of the development and management contract, and development of a hotel, entertainment center, casino and other ancillary facilities. The facilities under Alternative C would be similar to those proposed for Alternative B, but the casino would be further reduced. The hotel and entertainment center would be the same size as under Alternative B. Alternative C does not include a convention center component. A tribal government building is proposed on the south end of the project site.

## **Alternative D – Casino Only**

Alternative D consists of the fee-to-trust transfer of the project site, federal review of the development and management contract and development of a casino and ancillary facilities. This alternative only proposes a casino. No hotel, convention center, or entertainment center would be developed under this alternative. A tribal government building is proposed on the south end of the project site.

## **Alternative E – Commercial Retail-Office Space**

Alternative E consists of the fee-to-trust transfer of the project site and development of a commercial retail and office center with light industrial warehouse space. Under this alternative, the NIGC would not be required to review a development and management contract as there is no gaming component. There would be no casino, hotel, convention center, entertainment center, or tribal government building.

## Alternative F – No Action Alternative

Under the No Action Alternative, the project site would not be placed into federal trust for the benefit of the Tribe, and the project site would not be developed with uses described under any of the development alternatives in the near term. It is assumed that the project parcels would maintain their existing development densities and uses in the near term. In the cumulative scenario (by 2030), it is assumed the project site would be developed with business park and/or industrial uses west of the railroad tracks and public/quasi-public facilities east of the railroad tracks, consistent with local land use policies.

## ES.4 Areas of Environmental Controversy

To date, areas of environmental controversy have been identified through the scoping process and comment period on the Draft EIS. The Scoping Report was published November 2008 (ESA, 2008). The Draft EIS was available for agency/public comment from August 6, 2010 to October 20, 2010. Specific comments were received in the following issue areas: Air Quality, Alternatives Analysis, Biological Resources, Cultural and Historic Resources, Cumulative and Indirect Effects, Environmental Justice, Flood Control and Drainage, Geology and Soils, Hazards and Hazardous Materials, Land Use and Agriculture, Mitigation Measures, National Environmental Policy Act and Regulatory Compliance, Noise, Public Health and Safety, Public Services, Quality of Life and Community Character, Recreation, Scoping Process, Socioeconomics, Transportation, Visual Resources, Wastewater Treatment and Disposal, and Water Resources. The issues that have contained the most comments include Socioeconomics, Transportation, Wastewater Treatment and Disposal and Water Resources.

## ES.5 Environmental Consequences and Mitigation Summary

**Table ES-1** summarizes the environmental consequences and mitigation for each alternative in the EIS. In addition, the significance for each impact is shown before and after implementation of the associated mitigation measures.

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
<b>SECTION 4.2. Land Resources</b>							
Impact 4.2-1: Changes to Existing Topography	No mitigation required	LS	LS	LS	LS	LS	LS
Impact 4.2-2: Potential for Soil Hazards	<b>Mitigation Measure 5.2-1: Preparation of Design-Level Geotechnical Recommendations.</b> A design-level geotechnical report shall be prepared along with construction drawings and the Tribe shall adhere to the recommendations of the report.  See <b>Mitigation Measure 5.5-3: Federally Listed Species.</b>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.2-3: Potential for Seismic Hazards	See <b>Mitigation Measure 5.2-1.</b>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.2-4: Loss of Mineral Resources	No mitigation required	LS	LS	LS	LS	LS	LS
<b>SECTION 4.3. Water Resources</b>							
Impact 4.3-1: Changes to Existing Drainage Patterns	<b>Mitigation Measure 5.3-1: Comprehensive Drainage and Flood Management Planning and Implementation.</b> Prior to implementation of the selected alternative, the project proponent shall complete a comprehensive design-level Drainage Plan. This plan shall address drainage and flooding in the action area. The Drainage Plan will implement additional measures, including but not limited to additional pervious surfaces, stormwater retention ponds, additional underground stormwater retention capacity, and other measures to retain or infiltrate stormwater flows, such that no net increase in 100-year peak stormwater discharge occurs as a result of implementing the selected alternative.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS
Impact 4.3-2: Location in a Delineated Floodplain	<b>Mitigation Measure 5.3-2a: Location of Facilities Above the 100-Year Flood Height.</b> The project proponent will ensure that the proposed groundwater well is installed above the FEMA-defined 100-year flood height, plus an additional 1-foot allowance to account for potential increases in flood height that would result from installation of levees surrounding the wastewater treatment plant, water treatment plant, and wastewater storage pond, as relevant. Specifically, the pump house including all electric and mechanical components, shall be installed at a level equivalent to at least 3 feet above the FEMA-delineated 100-year flood height, plus an additional 1 foot to offset flood height increases from installing flood control levees, as relevant.  <b>Mitigation Measure 5.3-2b:</b> In accordance with FEMA floodplain hydraulic modeling requirements, the Tribe shall develop a hydraulic model to quantify the impact of wastewater facilities and other related systems proposed for construction within the 100-year floodplain, and 500-year floodplain if required by FEMA, of the Russian River. Depending on the results of the hydraulic model (e.g. modeling indicates that flood height increases would exceed 1 foot), the Tribe shall complete a Conditional Letter of Map Revision (CLOMR) prior to implementation of a project and must submit a Letter of Map Revision (LOMR) request to FEMA within 6 months of completion of a project.  <b>Measure 5.3-2c:</b> Under government to government consultation with FEMA, the Tribe shall seek participation in the National Flood Insurance Program (NFIP), which requires the Tribe to pass a resolution, adopt the effective Flood Insurance Rate Map that includes their lands, and	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
	adopt and enforce a flood damage prevention ordinance that meets or exceeds the minimum requirements of the program. <b>Measure 5.3-2d:</b> The Tribe shall establish a Tribal Mitigation Plan in accordance with 44 CFR 201.7, which addresses flood hazards and mitigation of those hazards. The plan shall include mitigation goals and strategies and other NFIP or floodplain management activities as described in the latest version of FEMA's Tribal Multi-Hazard Mitigation Guidance.						
Impact 4.3-3: Water Quality during Construction	No mitigation required	LS	LS	LS	LS	LS	LS
Impact 4.3-4: Water Quality during Operation	No mitigation required	LS	LS	LS	LS	LS	LS
Impact 4.3-5: Groundwater Levels and Effects on the Russian River from Groundwater Pumping	No mitigation required	LS	LS	LS	LS	LS	LS
Impact 4.3-6: Treated Effluent Sprayfields and Water Quality	<b>Mitigation Measure 5.3-3: Water Quality Mitigation for Proposed Sprayfields.</b> The applicant shall take the following measures to ensure no significant reduction in the quality of surface water or groundwater used for potable water supply under the selected alternative:  <ol style="list-style-type: none"> <li>1. Sprayfield operation shall be managed such that no runoff or other surface discharge of treated effluent occurs from the sprayfield site. Sprayfields shall be monitored on a daily basis for signs of treated effluent pooling or potential runoff. In the event that substantial pooling, runoff, or potential signs of runoff are found, sprayfield discharge rate or management shall be modified to ensure that no runoff occurs. All drainages shall be protected from receiving sprayfield runoff by berms, ditches, or other measures. In no instance shall sprayfields be operated during natural precipitation events, or when standing water is located on-site. This measure will thereby prevent the migration of treated effluent into surface waters, ensuring that comingling of treated effluent with surface waters does not occur.</li> <li>2. If the private water supply option is selected, groundwater quality shall be monitored for nutrients and pathogens. The applicant shall install at least three groundwater quality monitoring wells in the vicinity of the proposed water supply well, and shall sample each well at least monthly. Monitoring wells shall be screened at or above the level of the water supply well. In the event that pollutants associated with the sprayfield are detected in the groundwater in the vicinity of the water supply well, measures shall be taken to alter the pattern or intensity of wastewater/sprayfield disposal, to ensure that the water supply well does not become contaminated. In the event that the water supply well becomes contaminated with nutrients or pathogens associated with the proposed sprayfield, additional water treatment shall be installed, or a new well shall be installed, in order to ensure that drinking water quality meets federal requirements.</li> </ol>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
<b>SECTION 4.4. Air Quality</b>							
Impact 4.4-1: Construction Emissions	<p><b>Mitigation Measure 5.4-1: Dust Abatement Program.</b> The applicant shall require construction contractors to implement an appropriate dust abatement program at least as stringent as the recommendations of the most recent version of the Northern Sonoma County Air Pollution Control District Rule 430, Fugitive Dust Emissions. These would include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> <li>• Covering open bodied trucks when used for transporting materials likely to give rise to airborne dust.</li> <li>• Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Containment methods can be employed during sandblasting and other similar operations.</li> <li>• Conduct agricultural practices in such a manner as to minimize the creation of airborne dust.</li> <li>• The use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.</li> <li>• The application of asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.</li> <li>• The paving of roadways and their maintenance in a clean condition.</li> <li>• The prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.</li> <li>• Water all active construction areas at least twice daily to the extent necessary.</li> <li>• Cover open bodied trucks when used for transporting materials (e.g., soil, sand, and other loose materials) likely to give rise to airborne dust.</li> <li>• Apply asphalt, oil, water or suitable chemicals on unpaved roads, parking areas, staging areas, materials stockpiles, and other surfaces at construction sites which can give rise to airborne dust.</li> <li>• Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites so as to maintain them in a clean condition.</li> <li>• Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets so as to maintain them in a clean condition.</li> <li>• Limit traffic speeds on unpaved roads to 15 miles per hour (mph).</li> <li>• Install sandbags or other erosion-control measures to prevent silt runoff to public roadways.</li> </ul> <p><b>Mitigation Measure 5.4-2:</b> All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.</p> <p><b>Mitigation Measure 5.4-3:</b> General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn their engines off when not in use to reduce vehicle emissions.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
	<b>Mitigation Measure 5.4-4:</b> Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible.						
Impact 4.4-2: Operation Emissions	<p><b>Mitigation Measure 5.4-5: Transportation and Motor Vehicle Measures.</b> Implement the Transportation and Motor Vehicle Measures below:</p> <ul style="list-style-type: none"> <li>• Incorporate public transit into project design</li> <li>• Limit idling time for commercial vehicles, including delivery and construction vehicles.</li> <li>• Use low or zero-emission vehicles, where feasible including construction vehicles and Tribal-fleet vehicles.</li> <li>• Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides.</li> <li>• Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.</li> <li>• If feasible, increase the cost of driving and parking private vehicles by, e.g., imposing tolls and parking fees.</li> <li>• Provide shuttle service to public transit.</li> <li>• Provide public transit incentives such as free or low-cost monthly transit passes.</li> <li>• Implement parking cash-out program for employees, e.g., non driving employees receive transportation allowance equivalent to value of subsidized parking.</li> </ul> <p>See <b>Mitigation Measure 5.4-5:</b> Transportation and Motor Vehicle Measures.</p> <p><b>Mitigation Measure 5.4-6:</b> The applicant shall require busses and diesel loading trucks to comply with the California Air Resource Board's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (California Code of Regulations, Title 13, Division 3, Article 1, Chapter 10, Section 2458) which requires that the driver shall not idle for more than 5 minutes at any location, except in the case of passenger boarding where a ten minute limit is imposed, or when passengers are onboard.</p>	PS/S	PS/S	PS/S	PS/S	PS/S	LS
Impact 4.4-3: Objectionable Odors	<p><b>Mitigation Measure 5.4-7: Odor Management Plan.</b> The operator of the WWTP shall formulate a progressive Odor Management Plan. This plan will allow the operator to respond to odor complaints and revise operations as necessary. The operator shall coordinate with the NSCAPCD to ensure that the operator is notified of all odor complaints received regarding the facility. The Plan shall discuss this complaint response protocol and include progressive measures to be made in the event of repeated, verified complaints. When the operator or NSCAPCD staff verify strong odors at off-site receptors, the operator shall make changes in site operations to reduce the potential for odors. Odors may be reduced by installing additional odor control equipment, making process/treatment modifications, or other activities. Once complete, the Plan shall be submitted to the ICAPCD for a 30-day period for review and comment.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
Impact 4.4-4: Greenhouse Gas Emissions and Global Climate Change	<p><b>Mitigation Measure 5.4-8: Energy Efficient Measures.</b> Implement the Energy Efficient Measures below:</p> <ul style="list-style-type: none"> <li>• Install efficient lighting and lighting control systems. Site and design building to take advantage of daylight.</li> <li>• Install energy efficient heating and cooling systems, appliances and equipment, and control systems.</li> <li>• Use solar heating, automatic covers, and efficient pumps and motors for pools and spas.</li> <li>• Bus Shelter for Existing/Planned Transit Service</li> <li>• Parking Area Tree Cover (50% cover in 10 years)</li> <li>• Enhanced Recycling</li> <li>• Drought tolerant landscaping and shade trees</li> <li>• If financially feasible the Tribe could commit to construction of a facility that operates at a minimum level which is similar to the California Title 24 standards.</li> </ul> <p>See <b>Mitigation Measure 5.7-2</b> Employee Commuter Measure</p> <p><b>Mitigation Measure 5.4-10:</b> The Tribe shall compensate for indirect greenhouse gas (GHG) emissions which exceed 25,000 metric tons CO<sub>2</sub>e annually through the purchase of GHG credits offered at an approved GHG credit broker. The alternatives exceed 25,000 metric tons CO<sub>2</sub>e by the following amounts:</p> <ul style="list-style-type: none"> <li>• Alternative A – 27,211 CO<sub>2</sub>e</li> <li>• Alternative B – 11,748 CO<sub>2</sub>e</li> <li>• Alternative C – 8,928 CO<sub>2</sub>e</li> <li>• Alternative D – 1,430 CO<sub>2</sub>e</li> <li>• Alternative E – 18,758 CO<sub>2</sub>e</li> </ul> <p>Credits shall be purchased once operations begin, and purchases may be phased over the first 10 years of operation.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.4-5: Climate Change Impacts on Project Site	No mitigation required	LS	LS	LS	LS	LS	LS
Impact 4.4-6: Indoor Air Quality	<p><b>Mitigation Measure 5.4.9:</b> Indoor Air Quality Measures. The following measures are recommended:</p> <ul style="list-style-type: none"> <li>• The Tribe shall ensure that ventilation of outdoor air is consistent with ASHRAE Standard 62-19991 under all operating conditions.</li> <li>• To limit public exposure to environmental tobacco smoke, the Tribe shall provide non-smoking areas, or “smoke-free zones” in the casino gaming area.</li> <li>• The Tribe shall provide non-smoking rooms in the hotel.</li> <li>• The Tribe shall post information regarding the deleterious effects of second-hand smoke</li> </ul>						

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
	<p>in employee break room.</p> <ul style="list-style-type: none"> <li>The Tribe shall post signage at public entrances to buildings which allow indoor smoking, identifying these as areas where indoor smoking is permitted.</li> </ul>						
<b>SECTION 4.5. Biological Resources</b>							
Impact 4.5-1: Effects to Upland Habitats (Potentially Significant)	<p><b>Mitigation Measure 5.5-1: Upland Habitats.</b> The project applicant shall compensate for the loss of coast live oak woodland and north coast riparian scrub habitat at a ratio no less than 1:1. Compensation will include on-site creation, restoration, or enhancement along the southern portion of the project area north of and parallel with Coyote Creek (channel I-2). On-site creation/restoration plans must be prepared by a qualified biologist prior to construction and be implemented within one year following construction. On-site creation/restoration sites shall be monitored for at least five (5) years to ensure their success.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
	<p><b>Mitigation Measure 5.5-7: Upland Habitats.</b> Landscaped areas associated with project layout design shall be planted with native trees, shrubs, and ground covers. Landscaped areas shall avoid direct impacts to jurisdictional waters of the U.S.</p>						
	<p><b>Mitigation Measure 5.5-9: Upland Habitats.</b> No construction activities shall occur within the drip line of native trees that have been designated as avoided/protected from the project. If proposed construction activities are proposed within 50 feet of a protected tree, the project applicant shall clearly delineate the tree with appropriate fencing at the drip line.</p>						
Impact 4.5-2: Effects to Wetlands and Other Waters of the U.S. (Potentially Significant)	<p><b>Mitigation Measure 5.5-2: Wetlands and Other Waters of the U.S.</b> The project applicant shall ensure that any loss of waters of the U.S. shall be compensated for by the preservation or creation of similar habitat at a ratio no less than 1:1, prior to construction. Permits secured for the project (Section 404 and Section 401) may require higher ratios. Compensation may include on-site creation, restoration, or enhancement, off-site creation, or payment into a Corps-approved mitigation bank for in-kind habitat credits. Mitigation bank credits must be obtained prior to construction. On-site or off-site creation/restoration plans must be prepared by a qualified biologist prior to construction and approved by the Corps. On- or off-site creation/restoration sites shall be monitored for at least five (5) years to ensure their success.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
	<p><b>Mitigation Measure 5.5-6: Wetlands and Other Waters of the U.S.</b> The project applicant shall incorporate into the project site drainage plan the flow and treatment BMPs and the accompanying recommended design parameters (i.e. locations, sizing factors, soil specifications and plant selection) proposed in the preliminary Stormwater Quality Management Plan (Appendix Q).</p>						
Impact 4.5-3: Effects to Federally Listed Species (Potentially Significant)	<p><b>Mitigation Measure 5.5-3: Federally Listed Species.</b> Impacts to aquatic habitat for federally listed salmonids during construction shall be minimized by implementing Best Management Practices (BMP) to protect water quality. This may include installing temporary siltation barriers (such as silt fencing), straw wattles, covering exposed soils, protecting inlet structures with sand bags, and reseeding exposed soils immediately following construction. These BMPs shall</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
	be fully described within the project's Storm Water Pollution Protection Plan (SWPPP), which shall be prepared prior to construction and implemented by the project applicant during construction. The project applicant shall also adhere to the measures provided under the EPA's NPDES General Construction Permit. Equipment and soil stock areas shall be placed at least 50 feet away from aquatic water sources.						
Impact 4.5-4: Effects to Migratory Birds (Potentially Significant)	<p><b>Mitigation Measure 5.5-4: Migratory Birds.</b> The applicant shall make every effort to conduct any tree and shrub removal activities that are required for project construction outside of the migratory bird and raptor breeding season (March 1 through August 31). For construction activities that will occur between March 1 and August 31 of any given year, the applicant shall conduct preconstruction surveys in suitable nesting habitat within 500 feet of the project site for nesting raptors. Surveys shall be conducted by a qualified biologist. If nesting raptors are detected, the applicant will consult with a qualified biologist to develop suitable measures to avoid impacting breeding effort. Measures may include, but are not limited to:</p> <ol style="list-style-type: none"> <li>I. Maintaining a 500 foot buffer around each active raptor nest; no construction activities shall be permitted within this buffer except as described in Mitigation Measure 5.5-4II.</li> <li>II. Depending on conditions specific to each nest, and the relative location and rate of construction activities, it may be feasible for construction to occur as planned within the buffer without impacting the breeding effort. In this case (to be determined on an individual basis), the nest(s) shall be monitored by a qualified biologist during construction within the buffer. If, in the professional opinion of the monitor, the project would impact the nest, the biologist shall immediately inform the construction manager. The construction manager shall stop construction activities within the buffer until the nest is no longer active.</li> </ol>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.5-5: Effects to State and Local Special-Status Species (Potentially Significant)	<p>See <b>Mitigation Measure 5.5-3: Federally Listed Species.</b></p> <p><b>Mitigation Measure 5.5-5: State and Local Special-Status Species.</b> The applicant shall conduct a survey for bat roosts within suitable habitat on the project site. The survey shall be conducted by a qualified biologist. This survey shall include, at a minimum, a visual inspection of potential bat roosting sites, and may include an evening or night survey to observe emergence and/or to detect presence using sonic detectors (to detect bat vocalizations). If occupied bat roosts are detected, the applicant shall consult with a qualified biologist to develop measures that avoid impacting roosts. Measures may include, but are not limited to:</p> <ol style="list-style-type: none"> <li>I. Maintaining a 100-foot buffer around each roost; no construction activities shall be permitted within this buffer except as described in Mitigation Measure 5.5-5II.</li> <li>II. Exclusion of bats from roosts (ensuring that no bats are trapped in the roost). For maternity roosts, this measure may only be implemented once young have been reared and are able to freely leave the roost (typically before March and after August).</li> </ol>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
	<b>Mitigation Measure 5.5-8: State and Local Special-Status Species.</b> Prior to construction or grading activities a survey for the western pond turtle shall be performed by a qualified biologist within 48 hours of construction. Surveys shall focus on potential upland basking sites. Any pond turtles found during surveys shall be relocated by a qualified biologist to suitable aquatic habitat not proposed to be impacted within the study area. Upon clearance of the site of pond turtles, appropriate exclusionary fencing (associated with project site BMPs) shall be erected to prohibit potential turtle upland migration through, or basking within, the active construction site.						
<b>SECTION 4.6. Cultural and Paleontological Resources</b>							
Impact 4.6-1: Effects to Historic Properties (Potentially Significant)	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.6-2: Effects to Cultural and Paleontological Resources (Potentially Significant)	<b>Mitigation Measures 5.6.1: Archaeological and Historical Resources.</b> Due to the sensitivity of the general vicinity, appropriate recommendations consist of monitoring by a qualified archaeologist and Native American representative during ground-disturbing activities that occur within 150 feet of perennial water courses including Porterfield Creek at the north and central portions of the project area and the unnamed creek at the south of the project area. An archaeological monitoring program should be established that includes consultation between the consulting archaeologist, lead agency, and the project proponent. The program should clearly define the authority to temporarily halt/redirect construction should resources be encountered.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
	<b>Mitigation Measures 5.6.2: Archaeological and Historical Resources.</b> If previously unidentified cultural materials are unearthed during construction, work should be halted in that area until a qualified archaeologist can assess the significance of the find. Prehistoric materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If any find is determined to be significant, the project proponent and a qualified archaeologist will meet to determine the appropriate avoidance measures or other appropriate mitigation.						
	<b>Mitigation Measures 5.6.3: Human Remains.</b> Mitigation Measure 5.6-3: The possibility of encountering human remains cannot be entirely discounted. Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human grave. If human graves are encountered, work should halt in the vicinity and the County Coroner should be notified. At the same time, an archaeologist should be contacted to evaluate the situation. If the remains are determined to be of Native American descent, the Native American Heritage Commission (NAHC) shall be contacted within a reasonable timeframe. The NAHC will then identify the person(s) thought to be the Most Likely Descendent (MLD) of the deceased Native American. The MLD shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in PRC§ 5097.98.						

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
<b>SECTION 4.7. Socioeconomic Conditions</b>							
Impact 4.7-1: Direct Economic Effects from Construction and Operation	No mitigation required.	BI	BI	BI	BI	BI	LS
Impact 4.7-2: Indirect Economic Effects from Construction and Operation	No mitigation required.	BI	BI	BI	BI	BI	LS
Impact 4.7.1-3: Effects to Housing Supply	No mitigation required however the following mitigation measure is recommended based on comments on the Draft EIS: <b>Mitigation Measure 5.7-2:</b> The Tribe shall create an employee Commuter Program that will provide a shuttle service for employee commuters from the Santa Rosa/Rohnert Park area.	LS	LS	LS	LS	LS	LS
Impact 4.7-4: Fiscal Effects to Sonoma County and the City of Cloverdale	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.7-5: Effects to Community Infrastructureoj	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.7-6: Social Costs Associated with Problem Gambling	<b>Mitigation Measure 5.7-1: Problem Gambling.</b> <ul style="list-style-type: none"> <li>• The Tribe will adopt a policy statement on problem gambling.</li> <li>• The Tribe will contract with a gambling treatment professional to train management and staff to develop strategies for recognizing and addressing customers whose gambling behavior may strongly suggest they may be experiencing serious to severe difficulties.</li> <li>• The Tribe shall refuse service to any customer whose gambling behavior convincingly exhibits indications of problem or pathological gambling.</li> <li>• The Tribe shall respectively and confidentially provide the customer (as described above) with written information that includes a list of professional gambling treatment programs and self-help groups.</li> <li>• The Tribe shall prominently display materials describing the risks and signs of problem and pathological gambling behaviors. Materials shall also be prominently displayed that provide information on available programs for those seeking treatment for problem and pathological gambling disorders.</li> <li>• The Tribe shall implement procedures to allow for voluntary self-exclusion, enabling gamblers to ban themselves from a gambling establishment for a specific period of time.</li> <li>• The Tribe will enter into an agreement with Sonoma County for an annual contribution from the Tribe to local organizations that address problem gamblers in Sonoma County. Based on the previous calculation of the expected increase in problem gamblers in Sonoma County and trends in treatment of problem gamblers, the Tribe would compensate the county social services for a minimum of equivalent to 1.4 licensed counselor positions. If the County does not have a mechanism to provide these services then the Tribe shall contribute an equivalent amount to problem gambling treatment and prevention programs which serve Sonoma County.</li> </ul>	PS/LS	PS/LS	PS/LS	PS/LS	NI	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
Impact 4.7-7: Effects to the Cloverdale Rancheria of Pomo Indians	No mitigation required.	BI	BI	BI	BI	BI	LS
<b>SECTION 4.8. Transportation<sup>1</sup></b>							
Impact 4.8-1: Peak Hour Intersection Performance	<b>Mitigation Measure 5.8-1:</b> The project sponsor would pay 100% of the costs to install traffic signals at one central main entrance to the project site on Asti Road, and to construct a northbound right-turn lane and southbound left-turn lane on Asti Road at the site entrance. Supplementary driveways to the north and south of this signalized access would be configured to limit access to right-turn in/right-turn out only. The Tribe shall enter into an agreement with the County regarding maintenance of the traffic signal.	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	LS
	<b>Mitigation Measure 5.8-2:</b> The project sponsor would pay their fair share contribution towards the installation of traffic signals at the intersection of U.S. 101 Northbound Ramps / South Interchange.						
	<b>Mitigation Measure 5.8-3:</b> The project sponsor would pay their fair share contribution towards the installation of traffic signals at the intersection of Asti Road / South Interchange.						
	<b>Mitigation Measure 5.8-4:</b> The project sponsor would pay their fair share contribution towards the construction of a roundabout that encompasses the intersections of U.S. 101 Northbound Ramps / South Interchange and Asti Road / South Interchange. A Conceptual Approval Report would need to be completed as the first step of Caltrans' Project Initiation Document process.						
Impact 4.8-2: Freeway Segment Performance	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.8-3: Bicycle, Pedestrian and Public Transit Impacts	<b>Mitigation Measure 5.8-5:</b> The project would install either an off-street path or sidewalk along Asti Road between the SMART track/multi-use trail crossing of Asti Road and the project site entrance.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.8-4: Intersection Safety	See <b>Mitigation Measure 5.8-1 through 5.8-4.</b>	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	LS
Impact 4.8-5: Parking Capacity	<b>Mitigation Measure 5.8-6:</b> Prior to construction, the project applicant shall redesign the parking plan to provide an additional 135 parking spaces. These additional spaces shall be added so as not to substantially change the proposed site layout.	NI	NI	LS	PS/LS	NI	LS

<sup>1</sup> Table 5-1 provides a more specific summary of significance before and after mitigation for each mitigation measure.

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
Impact 4.8-6: Construction Impacts	No mitigation required.	LS	LS	LS	LS	LS	LS
Cumulative-Only	<p><b>Mitigation Measure 5.8-7:</b> The project sponsor would pay their fair share contribution towards the installation of traffic signals at the intersection of Cloverdale Boulevard / South Interchange.</p> <p><b>Mitigation Measure 5.8-8:</b> The project sponsor would pay their fair share contribution towards the installation of traffic signals at the intersection of U.S. 101 Southbound Ramps / South Interchange.</p> <p><b>Mitigation Measure 5.8-9:</b> The project sponsor would pay their fair share contribution towards the construction of a roundabout that encompasses the intersections of Cloverdale Boulevard / South Interchange and the U.S. 101 Southbound Ramps / South Interchange.</p> <p><b>Mitigation Measure 5.8-10:</b> The project sponsor would pay their fair share contribution towards the installation of traffic signals at the intersection of U.S. 101 Northbound Ramps / Citrus Fair Drive.</p>	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	PS/S with signalization and LTS with roundabout	LS
<b>SECTION 4.9. Land Use</b>							
Impact 4.9.1-1 Consistency with Existing Land Use Policies (Less Than Significant)	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.9.1-2 Compatibility with Surrounding Uses (Less Than Significant)	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.9.1-3 Consistency with the Airport Land Use Plans (Potentially Significant)	<p><b>Mitigation Measure 5.9-1:</b> In accordance with FAR Part 77.17 the project Applicant has submitted FAA form SF 7460-1, "Notice of Proposed Construction or Alteration" for FAA review. Pertinent information about the alteration and appropriate attachments showing the type and location of the alteration has been submitted. The Applicant will continue to consult with FAA and will adhere to the recommendations of the FAA, concerning lighting and construction activities, received in response to the Applicant's form SF7460-1 submission</p> <p><b>Mitigation Measure 5.9-2:</b> To ensure that the proposed wastewater ponds do not become an attractant to hazardous wildlife (such as ducks, geese, and other birds), the pond shall be monitored for one year following construction by a qualified biologist on a monthly basis to determine if hazardous wildlife are being attracted to it. Should it be determined that the pond is an attractant, it shall be covered to eliminate wildlife access. Acceptable materials that could be used to cover the pond include solid covers, grids, mesh, or netting. In addition, all lighting, storm water drainage, and landscaping plans at the WWTP site shall be designed to reduce or negate wildlife attractants. A wildlife hazard biologist shall review all plans.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
Impact 4.9.1-4 Effect on Agriculture (Less Than Significant)	No mitigation required.	LS	LS	LS	LS	LS	LS
<b>SECTION 4.10. Public Services</b>							
Impact 4.10-1 Effects to Public Water Supply	<b>Mitigation Measure 5.10-1: Municipal Water Agreement (If municipal option is chosen).</b> The Tribe would enter into a service contract with the City of Cloverdale for water service. The service contract would address the proportionate share of costs for the construction of water distribution lines along Asti Road which would serve the project and other developments. If municipal water cannot be provided the Tribe would choose the private water supply option.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.10-2 Effects to Public Wastewater	<b>Mitigation Measure 5.10-2: Municipal Wastewater Agreement (If municipal option is chosen).</b> The Tribe would enter into a service contract with the City of Cloverdale for wastewater service. If municipal water cannot be provided the Tribe would choose the private wastewater option.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.10-3 Effects to Solid Waste Facilities	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.10-4 Effects to Electricity, Natural Gas and Telecommunications Services	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.10.1-5 Effects to Law Enforcement Services	<b>Mitigation Measure 5.10-3: Law Enforcement Service Agreement.</b> The Tribe would enter into a service contract with the City of Cloverdale Police Department or Sonoma County Sheriff's Office for the provision of primary law enforcement services to the project site.  Alternatives A-D:  It is anticipated that approximately 2.0 to 2.5 new sworn officer positions would be needed to adequately provide services to the project site and surrounding community. The actual number of sworn officer positions and other costs would be negotiated with the City or County. It is also recommended that the Tribe fund a fair share of the cost of a new police facility for the City of Cloverdale should the City propose this improvement.  Alternative E:  It is anticipated that approximately a 0.5 new sworn officer position would be needed to adequately provide services to the project site and surrounding community. The actual number of sworn officer positions and other costs would be negotiated with the City or County. It is also recommended that the Tribe fund a fair share of the cost of a new police facility for the City of Cloverdale should the City propose this improvement.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.10-6 Effects to Fire Protection Services	<b>Mitigation Measure 5.10-4: Fire Protection Service Agreement.</b> The Tribe would enter into a service contract with the Cloverdale Fire Protection District for the provision of primary fire protection services to the project site.  Alternatives A-C:	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
	<p>It is anticipated that the Tribe would pay a fair share of the costs for (1) an aerial apparatus recommended for the Alexander Valley Resort, (2) regional training to fight multi-story structure fires, (3) other apparatus within the District's apparatus replacement program and (4) staffing needs.</p> <p>Alternative D and E: It is anticipated that the Tribe would pay a fair share of the costs for apparatus within the District's apparatus replacement program and staffing needs.</p>						
Impact 4.10-7 Effects to Emergency Medical Services	<p><b>Mitigation Measure 5.10-5: Ambulance Service Agreement.</b> The Tribe would enter into a service contract with the Cloverdale Healthcare District for provision of ambulance services to the project site.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
	<p><b>Mitigation Measure 5.10-6: Emergency Response Plan.</b> The Tribe would develop an emergency response plan (emergency medical, pandemic, natural disaster, failure of private water/wastewater facilities if applicable) in coordination with the local fire protection and emergency medical service providers. The plan would address staff training and the necessity of an on-site defibrillator.</p>						
<b>SECTION 4.11. Noise</b>							
Impact 4.11-1: Construction Noise and Vibration (Potentially Significant)	<p><b>Mitigation Measure 5.11.1a:</b> Construction activities shall be limited to the daytime hours of 7:00 a.m. to 6:00 p.m Monday through Friday, and shall be prohibited weekends and holidays.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
	<p><b>Mitigation Measure 5.11.1b:</b> To reduce daytime noise impacts due to construction, the applicant shall require construction contractors to implement the following measures:</p> <ul style="list-style-type: none"> <li>Equipment and trucks used for construction shall use the industry standard noise control techniques (e.g., standard mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds).</li> <li>Stationary noise sources shall be located as far from adjacent receptors, whenever feasible, and they shall be muffled and enclosed within temporary sheds and incorporate insulation barriers or other measures.</li> </ul>						
Impact 4.11-2: Operational Noise (Potentially Significant)	<p><b>Mitigation Measure 5.11.2:</b> Rooftop air conditioners and other continuously operated 24-hour equipment (i.e., rooftop chillers, refrigeration systems, and exhaust fans) shall be located at the furthest away point from the nearest residential receptor and/or include additional noise attenuation (i.e., rooftop barriers or parapets between the equipment and the nearest sensitive receptor to absorb or deflect the noise) as necessary to reduce noise levels from the equipment to below 50 dBA at the nearest off-site sensitive receptors.</p>	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.11-3: Operational noise associated with near-and long-term development of the proposed action in combination with other development would result in cumulatively considerable increases in the ambient noise environment.	No mitigation is required	LS	LS	LS	LS	LS	LS

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measures	Original Impact / Residual Impact with Mitigation					
		Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
<b>SECTION 4.12. Hazardous Materials</b>							
Impact 4.12-1: Effects from Existing Sources of Hazardous Materials (Less than Significant)	No mitigation required.	LS	LS	LS	LS	LS	LS
Impact 4.12-2: Hazardous Materials during Construction (Potentially Significant)	<b>Mitigation Measure 5.12-1: Construction Reporting.</b> In the event that contaminated soil and/or groundwater or other unknown hazardous materials are encountered during construction-related earthmoving activities, all work shall be halted until a qualified individual can assess the extent of contamination. If contamination is determined to be significant, representatives of the Tribe shall consult with the USEPA to determine the appropriate course of action, including the development of a sampling plan and remediation plan if necessary.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.12-3: Hazardous Materials during Operation (Less than Significant)	No mitigation required.	LS	LS	LS	LS	LS	LS
<b>SECTION 4.13. Visual Resources</b>							
Impact 4.13.1-1: Changes to Scenic Character (Potentially Significant)	<b>Mitigation Measure 5.13-1: Visual Resources.</b> The external appearance of the proposed project facilities, including the choice of color and materials, shall seek to reduce the visual impact of the proposed facilities. Bright reflective materials and colors shall be avoided in favor of colors that blend into the natural environment, mimic an agricultural scale structure or nearby residential structures.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
Impact 4.13.1-2: Night Lighting (Potentially Significant)	<b>Mitigation Measure 5.13-2: Light and Glare.</b> All outdoor light sources shall be properly shielded and installed to prevent light trespass on adjacent properties. Any flood or spot lamps must be aimed no higher than 45 degrees above straight down (half-way between straight down and straight to the side) when the source is visible from any offsite residential property or public roadway. Dark sky lighting techniques, including light shielding to prevent spill and fixtures for parking and walkways that direct all light to the ground, will be incorporated into the project.	PS/LS	PS/LS	PS/LS	PS/LS	PS/LS	LS
	<b>Mitigation Measure 5.13-3: Light and Glare.</b> All new outdoor roadway lights within the project site should consist of high-pressure sodium or low-wattage metal halide or comparable sources. As well, the intensity of the lights should be kept to a minimum necessary for safety and commerce as determined by the Tribe.						
	<b>Mitigation Measure 5.13-4: Light and Glare.</b> The proposed project facilities shall be painted with flat colors to reduce or eliminate glare						
<b>SECTION 4.14. Environmental Justice</b>							
Impact 4.14-1: Effects to Minority or Low-Income Populations	No mitigation required.	NI	NI	NI	NI	NI	NI

(Legend: NI = No Impact; BI = Beneficial Impact; LS = Less-Than-Significant -impact; PS = Potentially Significant; S = Significant;