FINAL ENVIRONMENTAL ASSESSMENT/ TRIBAL ENVIRONMENTAL IMPACT REPORT
AGUA CALIENTE BAND OF CAHUILLA INDIANS CATHEDRAL CITY FEE-TO-TRUST CASINO PROJECT

JULY 2019

LEAD AGENCY:
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LIST OF ACRONYMS

AB Assembly Bill
ADT average daily trips
AES Analytical Environmental Services
AF acre-feet
AFY acre-feet per year
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>AMR</td>
<td>American Medical Response</td>
</tr>
<tr>
<td>APE</td>
<td>Area of Potential Effects</td>
</tr>
<tr>
<td>APN</td>
<td>Assessor’s Parcel Number</td>
</tr>
<tr>
<td>BIA</td>
<td>Bureau of Indian Affairs</td>
</tr>
<tr>
<td>BMPs</td>
<td>Best Management Practices</td>
</tr>
<tr>
<td>CAA</td>
<td>Clean Air Act</td>
</tr>
<tr>
<td>CalEEMod</td>
<td>California Emissions Estimator Model</td>
</tr>
<tr>
<td>CAP</td>
<td>criteria air pollutant</td>
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<tr>
<td>CARB</td>
<td>California Air Resources Board</td>
</tr>
<tr>
<td>CBC</td>
<td>California Building Code</td>
</tr>
<tr>
<td>CCCAP</td>
<td>Cathedral City Climate Action Plan</td>
</tr>
<tr>
<td>CCFD</td>
<td>Cathedral City Fire Department</td>
</tr>
<tr>
<td>CCPD</td>
<td>Cathedral City Police Department</td>
</tr>
<tr>
<td>CDFW</td>
<td>California Department of Fish and Wildlife</td>
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<tr>
<td>CEQ</td>
<td>Council on Environmental Quality</td>
</tr>
<tr>
<td>CEQA</td>
<td>California Environmental Quality Act</td>
</tr>
<tr>
<td>CFH</td>
<td>cubic feet per hour</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CNNDDB</td>
<td>California Natural Diversity Database</td>
</tr>
<tr>
<td>CNEL</td>
<td>community noise equivalent level</td>
</tr>
<tr>
<td>CNPS</td>
<td>California Native Plant Society</td>
</tr>
<tr>
<td>CO</td>
<td>carbon monoxide</td>
</tr>
<tr>
<td>CO₂</td>
<td>carbon dioxide</td>
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<tr>
<td>CO₂e</td>
<td>carbon dioxide equivalents</td>
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<td>CPSC</td>
<td>California Public Safety Code</td>
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<tr>
<td>CURC</td>
<td>City Urban Revitalization Corporation</td>
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<td>CVWD</td>
<td>Coachella Valley Water District</td>
</tr>
<tr>
<td>CWA</td>
<td>Clean Water Act</td>
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<tr>
<td>cy</td>
<td>cubic yards</td>
</tr>
<tr>
<td>dBA</td>
<td>A-weighted decibels</td>
</tr>
<tr>
<td>DPM</td>
<td>diesel particulate matter</td>
</tr>
<tr>
<td>DRN</td>
<td>Downtown Residential Neighborhood</td>
</tr>
<tr>
<td>DTC</td>
<td>Downtown Commercial</td>
</tr>
<tr>
<td>DWA</td>
<td>Desert Water Agency</td>
</tr>
<tr>
<td>EA</td>
<td>Environmental Assessment</td>
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<tr>
<td>EMS</td>
<td>emergency medical services</td>
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<tr>
<td>EO</td>
<td>Executive Order</td>
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<tr>
<td>ESA</td>
<td>Environmental Site Assessment</td>
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<tr>
<td>EV</td>
<td>electric vehicle</td>
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<tr>
<td>FEMA</td>
<td>Federal Emergency Management Agency</td>
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<td>FESA</td>
<td>Federal Endangered Species Act</td>
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<td>FHWA</td>
<td>Federal Highway Administration</td>
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<tr>
<td>FICON</td>
<td>Federal Interagency Committee on Noise</td>
</tr>
<tr>
<td>FONSI</td>
<td>Finding of No Significant Impact</td>
</tr>
<tr>
<td>FTA</td>
<td>Federal Transportation Administration</td>
</tr>
<tr>
<td>GHG</td>
<td>greenhouse gas</td>
</tr>
<tr>
<td>gpd</td>
<td>gallons per day</td>
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TPH  Total Petroleum Hydrocarbon
tpy  tons per year
TUMF Transportation Uniform Mitigation Fee

USC  United States Code
USEPA United States Environmental Protection Agency
USFWS United States Fish and Wildlife Service

v/c volume to capacity
VdB vibration decibels

WRP-10 Water Reclamation Plant 10
SECTION 1.0
INTRODUCTION

1.1 SUMMARY OF THE PROPOSED ACTION AND ENVIRONMENTAL REVIEW PROCESS

This Environmental Assessment (EA)/Tribal Environmental Impact Report (TEIR), herein referred to as an EA, has been prepared pursuant to the requirements of the National Environmental Policy Act (NEPA; 42 United States Code [USC] §4321 et seq.) and the Tribal-State Gaming Compact (Compact) between the State of California and the Agua Caliente Band of Cahuilla Indians (Tribe) with an effective date of October 31, 2016. The EA assesses the environmental impacts of taking approximately 13.6 acres contiguous to the Tribe’s reservation in the City of Cathedral City (City), in Riverside County (County), California (North Site or Section 33 Parcel), into federal trust status for the Tribe for gaming purposes (Proposed Action). The Tribe subsequently proposes to develop the contiguous trust parcel with a casino, parking, bars, restaurants, retail, mixed-use space, and tribal government office space (Proposed Project).

The statutory authority for acquiring lands in trust status for Indian tribes is provided in the Indian Reorganization Act of 1934 (IRA; 25 USC §5108), with regulations codified at 25 Code of Federal Regulations (CFR) §151 et seq. Pursuant to 25 CFR Part 151, the Assistant Secretary of Indian Affairs, as an authorized representative of the Secretary of the Interior (Secretary), is charged with reviewing and approving tribal applications to take land into federal trust status. The Tribe is seeking to acquire land contiguous to the Agua Caliente Indian Reservation (Reservation) into trust for gaming purposes; thus, to be eligible for gaming land must comply with Section 20 of the Indian Gaming Regulatory Act (IGRA; 25 USC §2719[a][1]). Under Section 20 of IGRA (25 USC §2701 et seq.), gaming on lands acquired in trust by the Secretary after October 17, 1988, is prohibited, with some exceptions. Here, the relevant exception is that the North Site is located contiguous to the boundaries of the reservation of the Tribe on October 17, 1988 (25 USC § 2719 [a][1]).

This EA has been completed in accordance with NEPA; the Council on Environmental Quality’s (CEQ) Guidelines for Implementing NEPA (40 CFR §1500 et seq.); and the Bureau of Indian Affairs’ (BIA’s) NEPA Guidebook (59 Indian Affairs Manual [IAM] 3-H). For the purpose of this EA, the BIA serves as the Lead Agency for compliance with NEPA. This EA provides a detailed description of the Proposed Action and an analysis of the potential environmental consequences associated with the Proposed Action. This EA also includes a discussion and analysis of alternatives, including a Reduced Intensity Alternative, Non-Gaming Alternative, and No Action Alternative. The Off-site Alternatives Evaluation Report, Appendix A, provides an analysis of the eliminated South Site Alternative, as well as a description of other off-site alternatives eliminated from consideration within this EA, as described in Section 2.7.

Additionally, this EA has been prepared to comply with the requirements of the Compact. Section 11.0 of the Compact requires the Tribe to prepare a TEIR assessing the off-Reservation environmental impacts of the Proposed Project. To reduce paperwork and eliminate redundancy, this EA and the required Compact TEIR have been prepared in coordination, resulting in a joint EA/TEIR, hereinafter referred to as an EA.

1.2 PURPOSE AND NEED FOR PROPOSED ACTION

The federal Proposed Action is the acquisition of the 13.6-acre North Site in trust for gaming purposes for the Tribe pursuant to the Secretary's authority under the Indian Reorganization Act, 25 USC 5108 and the Indian Gaming Regulatory Act (IGRA), 25 U.S.C. § 2719 (a)(1). The purpose of the Proposed Action is to facilitate tribal self-sufficiency, self-determination, and economic development, thus, satisfying both the Department’s land acquisition policy as articulated in the Department’s trust land regulations at 25 C.F.R. Part 151, and the principle goal of IGRA as articulated in 25 U.S.C. § 2701. The need for the Department to act on the Tribe’s application is established by the Department’s regulations at 25 C.F.R. §§ 151.10(h) and 151.12, and the Tribe’s needs related to facilitation of tribal self-sufficiency, self-determination, and economic development are described further in Section 1.3.
1.3 BACKGROUND

The Tribe is a federally-recognized Tribe with an approximately 30,000-acre Reservation in Riverside County, California. In 1876 and 1877, executive orders established the Tribe’s Reservation to comprise, in a checkerboard pattern, all of the even-numbered sections in three townships, with some exceptions. With some exceptions, the odd numbered sections were granted to the Southern Pacific Railroad in fee, who sold the bulk of its grant to others who, over time, formed the three primary local municipalities of Palm Springs, Cathedral City, and Rancho Mirage. In the past 75 years, the Tribe has acquired various other parcels within the Reservation and surrounding vicinity as both tribal trust land and fee simple holdings.

Within the Reservation, approximately 4,000 acres are held in trust for the Tribe, approximately 18,000 acres are held in trust for individual Indian allottees, and approximately 9,300 acres are in fee simple. The Tribe also owns 5,800 acres off-Reservation, with approximately 3,700 of those acres held in trust. Since establishment of the Reservation, the Tribe itself has lost approximately 27,000 acres due to allotment and assimilation policies with over 9,000 acres having passed into fee simple ownership. The Tribe continuously seeks to re-establish its historic land base with a particular focus on acquiring parcels with cultural significance and parcels that can be used for tribal economic development or governmental purposes, as well as to mitigate the effects of checkerboard jurisdiction caused by the legacy of federal allotment policies.

Due to high acquisition costs and the location of several desirable resort communities within the Reservation boundaries, it is extremely difficult for the Tribe to re-acquire lands on or contiguous to the Reservation. The median price per acre in Palm Springs in 2012 was $2,387,097, which is significantly higher than the average price per acre of the Section 33 Parcel of $507,300. Although the Reservation encompasses over 30,000 acres, the total amount of tribally-owned land that is available for development of any kind is extremely limited, and the total amount of tribally-owned land that is available for gaming development is even smaller (refer to the Tribe’s fee-to-trust application and Section 2.7 for additional information).

The Tribe submitted a fee-to-trust application for the Section 33 Parcel (North Site), which is contiguous to the Tribe’s Reservation land in Cathedral City, to help ameliorate the historical loss of tribal lands and enable the Tribe to utilize its own resources to remedy the continuing impacts of allotment and assimilation, and to generate revenue to provide essential governmental services and consolidate existing trust allotments within the Reservation. The Tribe requires additional revenues to allow the tribal government to provide a wider variety of essential governmental services to its tribal members and more effectively exercise jurisdiction over tribal members and Indian lands. The Tribe anticipates that revenues from the Proposed Project will be used to develop a much needed tribal court system, create a robust tax commission, and to address the growing homelessness problem on the Reservation. Acquisition of the Section 33 Parcel will also further the Tribe’s goal of re-establishing its historic land base, and generate funding to re-acquire more of the tens of thousands of acres divested from the Tribe as a result of the previous allotment policy.

Additionally, as described further in Section 1.5 below, the Proposed Action is needed to strengthen the Tribe’s partnership with the City, as a significant portion of the Tribe’s lands are located within the City boundaries. The Tribe, City of Cathedral City, and the City Urban Revitalization Corporation (CURC) have worked cooperatively to share a common goal to redevelop the Section 33 Parcel with gaming, retail and mixed use development. This site is within the City’s long blighted downtown area, which is slated for redevelopment. The development of a gaming facility at the Section 33 Parcel is envisioned to serve as an anchor that would promote growth of a walkable Cathedral City entertainment district adjacent to the existing Cathedral City Civic Center, which houses the City Police Department and City Hall buildings, restaurants, theaters, and retail.

In summary, the Tribe’s need for requesting the Proposed Action is to promote the Tribe’s long-term economic vitality and self-governance capability by providing and sustaining essential government services for current and future generations, including a tribal court system, a tax commission, and to address the growing homelessness problem on the Reservation. In addition, the Tribe’s need for the Proposed Action is to help achieve the Tribe’s goal of re-establishing its historic land base through funding generated by the facility.
1.4 OVERVIEW OF THE ENVIRONMENTAL REVIEW PROCESS

As mentioned above in Section 1.1, this document has been prepared to meet NEPA and Compact environmental review requirements. A brief overview of both processes is provided below.

1.4.1 NATIONAL ENVIRONMENTAL POLICY ACT

Notice of Preparation (NOP) and Scoping

Although not required by NEPA for the preparation of an EA, the BIA as Lead Agency elected to conduct a 30-day scoping comment period and to hold a scoping meeting to solicit input from the public and agencies regarding the scope of the EA.

Pursuant to the Compact, a Notice of Preparation (NOP) describing the Proposed Project and announcing a 30-day scoping period and the date and location of a public scoping meeting was prepared and circulated for public and agency review on December 29, 2017. The NOP was published in the Desert Sun, posted online at on www.cathedralcitycasino.com, filed with the State Clearinghouse for distribution to state agencies, and was sent to various federal and local agencies through direct mailings, including Riverside County. A public scoping meeting was conducted at 6:00 pm on January 18, 2018, at the Doubletree by Hilton, located at 67967 Vista Chino, Cathedral City, to provide project information and to solicit public input on the EA scope and alternatives. Approximately 10 people attended the public meeting; of these, one provided oral comments.

The issues that were raised during the scoping period have been summarized within the NEPA Scoping Process Summary Report for the Agua Caliente Band of Cahuilla Indians Cathedral City Casino Fee-to-Trust Project, dated June 2018 (Appendix B). This EA addresses the issues and concerns summarized in the scoping report.

Environmental Assessment

This EA was prepared in accordance with NEPA to analyze and document the environmental consequences of constructing a casino and associated facilities subsequent to the transfer of 13.6 acres into federal trust status for the Tribe. Preparation of this EA included consultation with the BIA, Tribe, City, and others (see Section 6.0). The BIA will use this EA to determine whether or not the Proposed Action would result in adverse effects to the environment and to satisfy the environmental review process of 59 IAM 3-H, 40 CFR § 1501.3 and 40 CFR § 1508.9. The Draft EA was released for a 45-day comment period pursuant to Section 11.3 of the Compact. The comments received and responses thereto are provided in Appendix P. Comments will be considered by the BIA, and either a Finding of No Significant Impact (FONSI) will be prepared, or additional environmental analysis will be conducted. After the NEPA process is complete, the BIA may issue a determination on the Tribe’s fee-to-trust application for gaming.

1.4.2 TRIBAL-STATE COMPACT ENVIRONMENTAL REVIEW REQUIREMENTS

The Tribe entered into a new Class III gaming compact with the State of California in 2016. Pursuant to Section 11.0 of the Compact, the Tribe is required to prepare a TEIR to analyze the potential off-Reservation environmental impacts of the Proposed Project. The TEIR checklist included as Appendix B of the Compact is provided in Appendix C. This EA has been prepared to address all relevant checklist items.

As described above, an NOP for the joint EA/TEIR was submitted to the State Clearinghouse and Riverside County on December 29, 2017, pursuant to Section 11.2 of the Compact. Concerns raised in response to the NOP were considered during preparation of this EA.

The joint Draft EA/TEIR was been released for a 45-day comment period pursuant to Section 11.3 of the Compact. Comments received and responses are provided within this Final TEIR as Appendix P, and show good faith, reasoned analysis of the significant environmental points raised. This Final TEIR and mitigation recommendations will be considered by the Tribal Council in its decision to proceed with the Proposed Project. In accordance with Section 11.7 of the Compact, prior to the commencement of the Proposed Project and no later than the issuance of the Final TEIR, the Tribe shall offer to commence negotiations with the County and/or City and, upon acceptance of the Tribe’s offers, shall negotiate with the County and/or City and enter into enforceable written agreements with respect to the matters set forth below:
“(1) The timely mitigation of any Significant Effect on the Off-Reservation Environment (which effects may include, but are not limited to, aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, water resources, land use, mineral resources, traffic, noise, utilities and service systems, and cumulative effects), where such effect is attributable, in whole or in part, to the Project unless the parties agree that the particular mitigation is infeasible, taking into account economic, environmental, social, technological, or other considerations.

(2) Compensation for law enforcement, fire protection, emergency medical services and any other public services to be provided to the Tribe for the purposes of the Gaming Operation, including the Gaming Facility, as a consequence of the Project.

(3) Reasonable compensation for programs designed to address and treat gambling addiction.

(4) Mitigation of any effect on public safety attributable to the Project, including any compensation to the County and/or city as a consequence thereof.”

1.5 COORDINATION WITH THE CITY OF CATHEDRAL CITY
The Tribe has worked in cooperation with the CURC, and the City to realize a common vision for redevelopment of the City’s downtown area, which includes the alternative sites analyzed in this EA. Ordinance No. 624 was adopted in 2006, which stated that the purpose of redeveloping the downtown area was “to eliminate conditions of blight by: providing needed public improvements, encouraging rehabilitation of deteriorating structures, and facilitating land assembly and development which will result in employment opportunities….” The Tribe, CURC, and City share a common goal to develop a site in the downtown area for gaming, retail, and mixed-use development. The CURC and City have emphasized the importance of the proposed facility including a gaming component as an anchor to enable further growth of a walkable Downtown/Art and Design Village.

CURC received proceeds from the land acquisition transaction, which CURC is now utilizing to design and construct a much needed new fire station (411) for the City. The new fire station will be located immediately north of the North Site. This new station will provide improved off-Reservation and on-Reservation fire protection services, and is being sized to accommodate future development of the downtown area.

The City supported the 2016 Compact between the Tribe and the State of California with full knowledge that the Tribe intended to develop the North Site with a casino and related commercial development.

1.6 REGULATORY REQUIREMENTS AND APPROVALS
The Proposed Project, as described in Section 2.0, may require federal, State, and local approvals and actions. Table 1-1 identifies each responsible agency and the potential permit or approval required. Additionally, approval of the Proposed Project by the Tribal Council would also be required prior to implementation of the Proposed Project.
### Table 1-1
POTENTIAL PERMITS AND APPROVALS REQUIRED

<table>
<thead>
<tr>
<th>Agency</th>
<th>Permit or Approval</th>
<th>Alternatives</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal/State</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Secretary of the Interior</td>
<td>Transfer of alternative site into federal trust status for the Tribe</td>
<td>PP, RI, NG</td>
</tr>
<tr>
<td>United States Environmental Protection Agency (USEPA)</td>
<td>Verification of project coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities as required by the Clean Water Act (CWA)</td>
<td>PP, RI, NG</td>
</tr>
<tr>
<td></td>
<td>General Conformity Determination review</td>
<td>NG</td>
</tr>
<tr>
<td>California Office of Historic Preservation</td>
<td>Consultation under Section 106 of the National Historic Preservation Act (NHPA)</td>
<td>PP, RI, NG</td>
</tr>
<tr>
<td><strong>Local</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City of Cathedral City</td>
<td>Approval of water, wastewater, and/or drainage connections</td>
<td>PP, RI, NG</td>
</tr>
<tr>
<td></td>
<td>Approval of off-site road improvements</td>
<td>PP, RI, NG</td>
</tr>
<tr>
<td></td>
<td>Issuance of encroachment permits for frontage and access improvements, and traffic mitigations</td>
<td>PP, RI, NG</td>
</tr>
</tbody>
</table>

Notes: PP – Proposed Project Alternative; NA – No Action Alternative; RI – Reduced Intensity Alternative; NG – Non-Gaming Alternative
SECTION 2.0
ALTERNATIVES

This section describes the alternatives that are analyzed within this EA. A reasonable range of alternatives has been selected based on consideration of the purpose and need of the Proposed Action and opportunities for potentially reducing environmental effects. These alternatives include the Proposed Project Alternative, the No Action Alternative, the Reduced Intensity Alternative, and the Non-Gaming Alternative. Consistent with CEQ guidelines (40 CFR §1502.14), this section summarizes and compares the potential environmental consequences, benefits, and/or detriments of the project alternatives (Section 2.6). Alternatives that were considered but are not analyzed in this EA are also described (Section 2.7).

2.1 SITE LOCATION
The development site location considered in this EA is the North Site, or Section 33 Parcel, which is the 13.6-acre property contemplated in the Tribe’s fee-to-trust application. As described in Section 2.7 and Appendix A, off-site alternatives were considered but eliminated from detailed analysis within this EA. The Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative, if selected, would be built on the North Site. As shown on Figures 2-1 and 2-2 of Appendix D, the North Site is located within the City, in Riverside County, California and shares its eastern border with the Agua Caliente Reservation. The approximately 13.6-acre North Site is bordered by East Palm Canyon Drive/Highway 111 on the south, Date Palm Drive on the east, Buddy Rogers Avenue on the north, and commercial and vacant parcels within the City to the west (Figure 2-2 of Appendix D). Table 1 of Appendix B provides the County Assessor Parcel Numbers (APNs) and acreage for the North Site.

2.2 PROPOSED PROJECT ALTERNATIVE
The Proposed Project Alternative consists of the following components: (1) transfer of the 13.6-acre North Site into federal trust status for the benefit of the Tribe for gaming purposes; and (2) the subsequent development by the Tribe of a casino, mixed use facilities, and associated infrastructure on the trust property.

2.2.1 Fee-to-Trust Transfer
The Tribe has submitted an application to the BIA for the transfer of the 13.6-acre North Site into federal trust for the development of a casino and related facilities (Proposed Action). The proposed trust parcel boundaries are shown in Figure 2-2 of Appendix D. The BIA will make its determination regarding the proposed fee-to-trust acquisition in accordance with the procedures set forth in 25 CFR Part 151. The regulations in 25 CFR Part 151 implement Section 5 of the IRA, codified at 25 USC §5108, which is the general statute that provides the Secretary with authority to acquire lands in trust status for tribes and individual Indians. The Tribe and the federal government would exercise civil regulatory jurisdiction over the site once it is taken into trust.

2.2.2 Casino Development
The Tribe proposes to develop a casino and ancillary facilities on the North Site after it is conveyed into federal trust status. A conceptual site plan for the Proposed Project Alternative is shown in Figure 2-3 of Appendix D. Proposed facilities include a casino with 40,000 square feet (sf) of gaming floor space, parking, and mixed-use facilities, including a combination of tribal government office space, restaurants, and retail uses totaling 125,000 sf of development. A breakdown of the components of the Proposed Project Alternative is provided in Table 2-1.

The casino would be open 24 hours a day, 7 days a week. The Proposed Project Alternative would create a total of 556 direct employment opportunities at the casino and mixed-use facilities within the North Site (Appendix E). The casino would have approximately 500 Class III gaming devices, and 8 table games.
Mixed use space is anticipated to be developed within a combination of office, restaurants, and retail facilities. Tribal governmental office space is anticipated to be located within Building A as shown on Figure 2-3 of Appendix D and would be occupied by several tribal governmental departments that are currently located in non-tribal leased office space or have outgrown their existing space at the Tribal Administration Plaza, including Tribal Realty, Emergency Services, the Tribal Historic Preservation Officer (THPO), and Tribal Education Services. Although the exact uses have not been established, it is anticipated that retail development would occupy approximately 40 percent of the remaining space with restaurant uses occupying approximately 60 percent.

**Architecture, Signage, Lighting, and Landscaping**

The buildings architecture and exterior signage would enhance the natural characteristics of the site and vicinity by incorporating native materials and colors. Illuminated signs would be designed to blend with the light levels of the building and landscape lighting in both illumination levels and color characteristics. The exterior lighting of the Proposed Project would be integrated into components of the architecture and would be strategically positioned to minimize off-site lighting and any direct site lines to the public. The architectural design of the Proposed Project would be enhanced by landscaping using drought tolerant plants native to the region.

**Parking**

Approximately 1,000 surface-level parking spaces would be constructed to accommodate patrons and employees. The development of a parking deck may be necessary if the 1,000 surface parking spaces are not adequate to serve patrons of the Proposed Project Alternative. This two-level parking deck would provide an additional 240 parking stalls, and would be constructed with a maximum height of 28 feet above grade for light poles on the top level. The deck would be located within the planned parking area on the site, in the approximate location shown on Figure 2-3 of Appendix D.

**Construction**

Construction of the casino and adjoining mixed use facilities is conservatively assumed to occur in one phase starting in 2019. Construction of the parking lot, on-site utilities, and landscaping would occur simultaneously.
with construction of the casino. In accordance with the Compact, the proposed facilities would conform to the applicable building code requirements of the California Building Code (CBC) and California Public Safety Code (CPSC), including building, electrical, energy, mechanical, plumbing, fire protection, and safety as adopted under the Tribal Building and Safety Code (Tribal Ordinance No. 26). An indoor sprinkler system would be installed to provide fire protection.

**Water Supply**

Water supply for existing (and historical) uses within the North Site is provided through the Desert Water Agency (DWA). The estimated average daily water usage for the Proposed Project Alternative would be approximately 33,929 gallons per day (gpd), with an annual consumption of approximately 38 acre-feet (AF; Appendix F). As described in Section 4.9, DWA anticipates it will have a sufficient water supply to serve the Proposed Project Alternative and existing users.

While there are several existing DWA water mains on and in the immediate vicinity of the North Site, these mains in their current layout would be insufficient to accommodate the projected potable water demand and fire flow requirement of the Proposed Project Alternative (Appendix F). Therefore, the Proposed Project Alternative includes the construction of a new 12-inch main that would run west along the southern boundary of the North Site within East Palm Canyon Drive from an existing water main at the intersection of East Palm Canyon Drive and Date Palm Drive, and would then run north through the North Site along Allen Avenue, terminating at the existing water main running east-to-west in Buddy Rogers Avenue. This proposed main would provide adequate fire flow to the North Site under the Proposed Project Alternative (Appendix F). The Proposed Project Alternative would also require the removal or abandonment of the existing water mains on the North Site that are between Allen Avenue and Date Palm Drive. The remaining existing water mains located west of Allen Avenue would be connected to the new water main and would remain in service, though they may be relocated within the site to accommodate new construction and/or follow new roadway alignments. All water supply infrastructure improvements would occur within or immediately adjacent to the North Site.

**Wastewater Treatment**

All wastewater generated within the North Site is currently conveyed by DWA sewer lines and treated at the Coachella Valley Water District’s (CVWD) Water Reclamation Plant 10 (WRP-10) facilities. As described in Section 4.9.1, CVWD’s treatment facilities would have sufficient excess capacity to accommodate the increase in wastewater flows resulting from the Proposed Project Alternative. While there are several sewer mains and branch lines on and in the vicinity of the North Site, these lines are inadequate in their current layout to serve the Proposed Project Alternative. Therefore, the Proposed Project Alternative involves the construction of a new 8-inch sewer main that would run west along the northern site boundary within Buddy Rogers Avenue from the existing lift station at the intersection of Buddy Rogers Avenue and Date Palm Drive and then south through the North Site along Allen Avenue to the point where Allen Avenue currently intersects with Grove Street. The portion of the existing sewer main in Grove Street between Allen Avenue and Date Palm Drive would need to be removed or abandoned, while the portion west of Allen Avenue would be connected to the new sewer line and remain in service, though it may be relocated on-site to accommodate construction activities or the realignment of roadways. All wastewater infrastructure improvements would occur within or immediately adjacent to the North Site, and no improvements to other downline components of the DWA or CVWD conveyance and treatment infrastructure would be required.

**Grading and Drainage**

Construction would involve grading and excavation for building pads and parking lots. Grading of the North Site to accommodate the Proposed Project Alternative is anticipated to require the net import of a maximum of 91,933 cubic yards (cy) of fill (Appendix G). Structural fill would be transported in accordance with State and County requirements during normal construction hours (6 a.m. to 5 p.m.), and dust suppression Best Management Practices (BMPs) would be used for roadways and trucks.

On the North Site there is currently a 26-foot difference in elevation from southwest corner to northeast corner. Because the casino building is anchored at the southeast corner, a slope of less than 2 percent down to the East
Palm Canyon Drive curb was used. However, there is a more than 16-foot difference in elevation remaining from the low end of East Palm Canyon Drive to the northeast corner. Going west on East Palm Canyon Drive the buildings were placed at street grade, and the other buildings were stepped down from one to the next to the maximum extent without introducing stairs and ramps at all the entrances. This grading strategy resulted in a conservatively high level of fill material required for development of the North Site. Imported fill volumes may be reduced during final design of the Proposed Project Alternative. The final design phase of the Proposed Project Alternative will also include finalization of the grading plan for the site.

The North Site currently has a total impervious area of approximately 3.1 acres. An existing 48-inch storm drain pipe runs underground through the North Site beneath Allen Avenue from Date Palm Drive to the North Cathedral Channel, but is not able to directly receive stormwater flows from the North Site. Development of the Proposed Project Alternative would increase the total impervious acreage on the North Site to approximately 12.24 acres (Appendix G). City standards require the on-site retention of 100 percent of stormwater flows resulting from a 100-year, 3-hour storm event. To provide the necessary 137,244 cubic feet of storage required to accommodate flows from such an event, the Proposed Project Alternative involves the installation of approximately 2,010 linear feet of 96-inch perforated corrugated metal pipe surrounded by porous stone beneath the proposed parking areas in the northeast portion of the North Site (Appendix G). These pipes, which would provide approximately 138,166 cubic feet of storage, would contain stormwater flows and allow them to infiltrate slowly into the underlying aquifer. Grates and filter bags would also be installed around drainage inlets to remove trash, debris, and sediment from the runoff before it flows to the retention facilities. Runoff to off-site drainage facilities would not occur.

Other Low Impact Development (LID) features designed to reduce impacts to surface waters and filter stormwater runoff that may be incorporated into the design of the Proposed Project Alternative include bio-retention facilities, vegetated filter strips, and possibly permeable pavement. Bio-retention facilities are low points that store runoff and allow it to infiltrate; these would be incorporated between rows of vehicles in the parking lots. Proposed vegetated filter strips are areas of landscaped vegetation adjacent to impervious areas that would reduce the velocity of runoff and allow pollution to be deposited into the vegetated areas. Permeable pavement, which is an option being considered by the Tribe for parking lot areas, would have a high infiltration rate while accommodating heavy vehicle loads.

The Proposed Project Alternative would comply with the NPDES general construction permit and implement stormwater discharge management controls that effectively reduce or prevent the discharge of pollutants into receiving waters during construction in accordance with the CWA. In accordance with NPDES general permit requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared prior to construction. The SWPPP would include BMPs to minimize storm water effects to water quality during construction.

**Roadway Access**

The Proposed Project would be accessible via one full-access driveway on East Palm Canyon Drive, with secondary access along Buddy Rogers Avenue (as shown in Figure 2-3 of Appendix D). Parking lot access would also be provided to the northeastern lot, which includes the loading docks and service entry. This area would be primarily used for employees and service vehicles.

The design of the Proposed Project Alternative includes the construction of full width improvements on all internal roadways, including traffic calming measures in parking lots and internal roadways. The Proposed Project Alternative contemplates construction of roadway improvements and appropriate signage and striping adjacent to the North Site’s boundary to provide three westbound lanes on East Palm Canyon Drive, three southbound lanes on Date Palm Drive, and one eastbound lane on Buddy Rogers Avenue. Additionally, modifications at existing traffic signals adjacent to the North Site will be constructed as needed.

The driveway for the Proposed Project Alternative at Buddy Rogers Avenue would be restriped with a one-way stop control to provide one left turn and one shared through-right turn northbound lanes; one shared left-through-right southbound lane; one shared left-through-right eastbound lane; and one shared left-through-right westbound
The driveway for the Proposed Project Alternative at East Palm Canyon Drive would be restriped with signalized control to provide one left turn and one right turn southbound lanes; one left turn, two through, and one right turn eastbound lanes; and one left turn, three through, and one right turn westbound lanes. Further, sight distances at these driveways will be reviewed with respect to Riverside County sight distance standards at the time of preparation of final grading, landscape, site development, and street improvement plans.

Law Enforcement, Fire Protection, and Emergency Medical Services
The Cathedral City Police Department (CCPD) provides law enforcement services to the area of Cathedral City in which the North Site is located and would be the primary agency responsible for law enforcement associated with the Proposed Project Alternative. Tribe-managed security personnel and security cameras would provide surveillance of proposed structures, parking areas, and ancillary facilities.

The Cathedral City Fire Department (CCFD) currently serves the North Site and vicinity and would provide fire protection services to the project under the Proposed Project Alternative. CCFD’s Station 411 is currently located in the northeast corner of the North Site, but the City is planning to move Station 411 to a location immediately north of its existing location, north of Buddy Rodgers Avenue and east of Second Street Park. Station 411 will continue to serve the vicinity of the North Site following its relocation. Building plans and specifications would comply with the International Fire Code (IFC) requirements as adopted under the Tribal Building and Safety Code for commercial structures, including requirements for sprinkler systems and fire extinguishers. CCFD would also be the primary provider of EMS to the Proposed Project Alternative. In the event that the CCFD EMS team is unable to respond to a service call at the Proposed Project Alternative, American Medical Response (AMR) or Riverside County EMS, both based in the City of Riverside, may also be contacted.

As described in Section 1.4.2, Section 11.7 of the Compact requires that if it is determined that law enforcement, fire protection, emergency medical services (EMS), and any other public services will be burdened as a result of the Proposed Project despite the mitigation measures identified in this EA and the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code, prior to commencement of the Proposed Project Alternative, and no later than the issuance of the Final TEIR to the County, the Tribe shall offer to commence negotiations with the City and if necessary, the County. These negotiations would allow for all parties to enter into enforceable intergovernmental agreements with respect to the matters set forth in Section 11.7(a) of the Compact to ensure that the mitigation contemplated herein is sufficient.

Electricity and Natural Gas
Southern California Edison (SCE) provides electrical services to the North Site and vicinity and would provide electricity to the Proposed Project Alternative. There are existing underground and overhead electrical lines on and adjacent to the North Site which may need to be reoriented to accommodate and serve the development of the Proposed Project Alternative.

Southern California Gas Company (SoCalGas) provides natural gas services to the North Site and vicinity and would provide natural gas to the Proposed Project Alternative. There are existing high pressure distribution lines running immediately adjacent to the southern and eastern boundaries of the North Site beneath East Palm Canyon Drive and Date Palm Drive.

The Proposed Project Alternative is estimated to have an electrical load of approximately 7.33 megavolt-amperes (MVA), and a natural gas load of approximately 21,800 cubic feet per hour (CFH; MSA Engineering Consultants, 2018).

2.2.3 PROTECTIVE MEASURES AND BEST MANAGEMENT PRACTICES
Protective measures and BMPs, including regulatory requirements, green construction methods as adopted under the Tribal Building and Safety Code, and voluntary measures that would be implemented by the Tribe, have been incorporated into the design of the Proposed Project Alternative. Where applicable, these measures will be incorporated into any design or construction contracts to eliminate or substantially reduce environmental consequences from the Proposed Project Alternative. These measures are discussed below in Table 2-2.
### TABLE 2-2
**PROPOSED PROJECT ALTERNATIVE BEST MANAGEMENT PRACTICES**

<table>
<thead>
<tr>
<th>Resource Area</th>
<th>Best Management Practices</th>
</tr>
</thead>
</table>
| **Land Resources**     | - A grading report will be prepared and submitted with the working design plans. All recommendations of the report will be adhered to.  
                          - All site clearing, removal of all unsuitable soil, proper moisture conditioning, review of imported fill material, fill placement, observation of foundation excavations, and other site grading will be verified during construction to ensure compliance with standard engineering practices.  
                          - All structures will meet CBC and CPSC requirements as adopted under the Tribal Building and Safety Code.  
                          - Erosion control measures will be implemented during construction as described further under the Water Resources BMPs.                                                                              |
| **Water Resources**    | The Tribe shall comply with the NPDES General Construction Permit from the USEPA, for construction site runoff during the construction phase in compliance with the CWA. A SWPPP shall be prepared, implemented, and maintained throughout the construction phase of the development, consistent with Construction General Permit requirements. The SWPPP prepared for the site would include, but would not be limited to, the following BMPs:  
                          - To the extent feasible, grading activities shall be limited to the immediate area required for construction and remediation.  
                          - Temporary erosion control measures (such as silt fences, fiber rolls, vegetated swales, a velocity dissipation structure, staked straw bales, temporary re-vegetation, rock bag dams, erosion control blankets, and sediment traps) shall be employed for disturbed areas.  
                          - Construction activities shall be scheduled to minimize land disturbance during peak runoff periods.  
                          - Disturbed areas shall be paved or re-vegetated following construction activities.  
                          - Construction area entrances and exits shall be stabilized with large-diameter rock.  
                          - A spill prevention and countermeasure plan shall be developed which identifies proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used on site.  
                          - Petroleum products shall be stored, handled, used, and disposed of properly in accordance with provisions of the CWA (33 USC §1251 to 1387).  
                          - Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of surface and groundwater.  
                          - Fuel and vehicle maintenance areas shall be established away from all drainage courses and designed to control runoff.  
                          - Sanitary facilities shall be provided for construction workers.  
                          - Disposal facilities shall be provided for soil wastes, including excess asphalt during construction.  
                          - Wheel wash or rumble strips and sweeping of paved surfaces shall be used to remove any and all tracked soil.  
                          - LID methods shall be implemented that would help store, infiltrate, evaporate, and contain stormwater runoff.  
                          - Techniques that may be included in the design of the Proposed Project include: bio-retention facilities, vegetated filter strips, and permeable pavement. |
| **Air Quality Construction** | The following dust suppression measures will be implemented to control the production of fugitive dust (PM$_{10}$) and prevent wind erosion of bare and stockpiled soils:  
                          - Spray exposed soil with water or other suppressant twice a day or as needed to suppress dust.  
                          - Use non-toxic chemical or organic dust suppressants on unpaved roads and traffic areas.  
                          - Minimize dust emissions during transport of fill material or soil by wetting down loads, ensuring adequate freeboard (space from the top of the material to the top of the truck bed) on trucks, cleaning the interior of cargo compartments on emptied haul trucks before leaving a site, and/or covering loads.  
                          - Promptly clean up spills of transported material on public roads.  
                          - Restrict traffic speeds on site to 15 miles per hour to reduce soil disturbance.  
                          - Provide wheel washers to remove soil that would otherwise be carried off site by vehicles to decrease deposition of soil on area roadways.  
                          - Cover dirt, gravel, and debris piles as needed to reduce dust and wind-blown debris.  
                          - The following measures will be implemented to reduce emissions of criteria pollutants, greenhouse gases (GHGs), and diesel particulate matter (DPM) from construction:  
                          - The Tribe shall control criteria pollutants and GHG emissions from the facility by requiring all diesel-powered equipment be properly maintained and minimize idling time to five minutes when construction equipment is not in use, unless per engine manufacturer’s specifications or for safety reasons more time is required. Since these emissions would be generated primarily by construction equipment, machinery engines shall be kept in good mechanical condition to minimize exhaust emissions. The Tribe shall employ periodic and unscheduled inspections to accomplish the above measures.  
                          - Require all construction equipment with a horsepower rating of greater than 50 be equipped with diesel particulate filters, which would reduce approximately 85 percent of DPM. |

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Agua Caliente Cathedral City Fee-to-Trust Casino Project  
Final Environmental Assessment*
**Resource Area** | **Best Management Practices**
--- | ---
Air Quality | The Tribe will reduce emissions of criteria air pollutants and GHGs during operation of the Proposed Project through the following actions:
- The Tribe shall use clean fuel vehicles in the vehicle fleet where practicable, which would reduce criteria pollutants and GHGs emissions.
- The Tribe shall provide preferential parking for employee vanpools, carpools, and or other rideshare vehicles (such as ZIP car) which would reduce criteria pollutants and GHGs.
- The Tribe shall consider and to the extent feasible will incorporate preferential parking for Plug-In Electric Vehicles, along with the installation of corresponding electric vehicle (EV) charging stations into the design of the Proposed Project.
- Shuttle service to and from population centers shall be provided as feasible, which would reduce criteria pollutants and GHGs.
- Water consumption shall be reduced through low-flow appliances, drought resistant landscaping, and the incorporation of “Save Water” signs near water faucets throughout the development.
- The Tribe shall control criteria pollutants, GHG, and diesel particulate matter (DPM) emissions during operation of the Proposed Project by requiring all diesel-powered vehicles and equipment be properly maintained and minimizing idling time to five minutes at loading docks when loading or unloading food, merchandise, etc. or when diesel-powered vehicles or equipment are not in use; unless per engine manufacturer’s specifications or for safety reasons more time is required. The Tribe shall employ periodic and unscheduled inspections to accomplish the above mitigation.
- All buildings within the Proposed Project site will be constructed generally consistent with Title 24 requirements and green building standards as adopted under the Tribal Building and Safety Code, and thus will incorporate energy efficiency features. The Tribe may elect to participate in the SCE Savings by Design Program to identify further energy saving measures. These may include:
  - Use of energy-efficient lighting, appliances, and heating and cooling systems
  - Reflective roofing
  - Use of automatic temperature and lighting controls
- The Tribe shall install recycling bins throughout the casino for glass, cans, and paper products. Trash and recycling receptacles shall be placed strategically outside to encourage people to recycle. In addition, the Tribe will promote the use of non-polystyrene take-out containers and encourage food waste composting programs at all restaurants that serve more than 100 meals per day. The Tribe will reduce solid waste stream of the facility by at least 50 percent.
- The Tribe shall plant trees and vegetation on site or fund such plantings off site. The addition of photosynthesizing plants would reduce atmospheric carbon dioxide (CO₂), because plants use CO₂ for elemental carbon and energy production. Trees planted near buildings would result in additional benefits by providing shade to the building; thus reducing heat absorption, reducing air conditioning needs and saving energy.
- The Tribe shall discourage buses from idling for extended periods during operation of the Proposed Project.
- On-site pedestrian facility enhancements such as walkways, benches, proper lighting, and building access will be provided, which are physically separated from parking lot traffic.
- Adequate ingress and egress at entrances will be provided to minimize vehicle idling and traffic congestion.

Cultural Resources | Any inadvertent discovery of archaeological resources shall be subject to Section 106 of the National Historic Preservation Act as amended (36 CFR § 800), the Native American Graves Protection and Repatriation Act (NAGPRA; 25 USC § 3001 et seq.), and the Archaeological Resources Protection Act of 1979 (16 USC § 470aa-mm). Specifically, procedures for post review discoveries without prior planning pursuant to 36 CFR § 800.13 shall be followed. The purpose of the following BMPs is to minimize the potential adverse effect of construction activities to previously unknown archaeological or paleontological resources in the case of inadvertent discovery:
- All work within 50 feet of the find shall be halted until a professional archaeologist meeting the Secretary of the Interior’s qualifications (36 CFR §61), or paleontologist if the find is of a paleontological nature, can assess the significance of the find in consultation with the BIA, other appropriate agency and the Tribe.
- If any archaeological find is determined to be significant by the archaeologist or paleontologist, the THPO shall meet with the archaeologist, or paleontologist, to determine the appropriate course of action, including the development of a Treatment Plan and implementation of appropriate provisions, if necessary.

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### Resource Area

<table>
<thead>
<tr>
<th>Best Management Practices</th>
</tr>
</thead>
<tbody>
<tr>
<td>All significant cultural or paleontological materials recovered shall be subject to scientific analysis, professional curation, and a report prepared by the professional archaeologist, or paleontologist, according to current professional standards.</td>
</tr>
<tr>
<td>If human remains are discovered during ground-disturbing activities on Tribal lands, pursuant to NAGPRA, the THPO and a BIA representative shall be contacted immediately, and shall determine whether the remains are Native American. If Native American, the provisions of NAGPRA shall apply. No further disturbance shall occur until the THPO and BIA representative have made the necessary findings as to the origin and disposition.</td>
</tr>
</tbody>
</table>

### Public Services and Utilities

- The Tribe will voluntarily pay development impact fees to the City, as identified in Chapter 3.17 of the City’s Municipal Code, to provide compensation for public services to be provided to the proposed development.
- Areas surrounding the gaming facilities will have “No Loitering” signs in place, be well lit and be patrolled regularly by roving security guards. This will aid in the prevention of auto theft and other similar criminal activity.
- The Tribe will conduct background checks of all gaming employees, as that term is defined in Section 2.11 of the Compact, and ensure that all gaming employees meet licensure requirements established by IGRA, National Indian Gaming Commission regulations, the Tribe’s Gaming Ordinance, and the Compact.
- The Tribe will comply with Section 12.8 of the Compact, which specifically requires that the purchase, sale, and service of alcoholic beverages by or to patrons be subject to California alcoholic beverage laws.
- Construction equipment will contain spark arrestors, as provided by the manufacturer.
- Staging areas, welding areas, or areas slated for development using spark-producing equipment will be cleared of dried vegetation or other materials that could serve as fire fuel.

### Visual Resources

- Placement of floodlights on buildings will be designed so as to not cast light off site.
- Outdoor light fixtures shall be fully or partially shielded and filtered consistent with the City Municipal Code §8.96.050.
- Perimeter lighting shall be installed consistent with the City Municipal Code §8.34.110.

### Noise

- Unless an early work permit is issued by the Tribe in consultation with the City, construction activities will be limited to daytime hours consistent with the City’s Municipal Code 11.96.070:
  - October 1 through April 30: Monday through Friday 7:00 am to 5:30 pm; Saturday: 8:00 am to 5:00 pm; Sunday: none; State holidays: none.
  - May 1 through September 30: Monday through Friday: 6:00 am to 7:00 pm; Saturday: 8:00 am to 5:00 pm; Sunday: none; State holidays: none.
- All powered equipment will comply with applicable federal regulations and all such equipment will be fitted with adequate mufflers according to the manufacturer’s specifications to minimize construction noise effects.
- Heating, ventilation, and air conditioning (HVAC) equipment will be shielded to reduce noise.
- Pile driving will not occur prior to 9:00 a.m. or after 5:00 p.m.

### Hazardous Materials

- Personnel shall follow BMPs for filling and servicing construction equipment and vehicles. BMPs that are designed to reduce the potential for incidents/spills involving the hazardous materials include the following:
  - To reduce the potential for accidental release, fuel, oil, and hydraulic fluids shall be transferred directly from a service truck to construction equipment.
  - Catch-pans shall be placed under equipment to catch potential spills during servicing.
  - Refueling shall be conducted only with approved pumps, hoses, and nozzles.
  - All disconnected hoses shall be placed in containers to collect residual fuel from the hose.
  - Vehicle engines shall be shut down during refueling.
  - No smoking, open flames, or welding shall be allowed in refueling or service areas.
  - Refueling shall be performed away from bodies of water to prevent contamination of water in the event of a leak or spill.
  - Service trucks shall be provided with fire extinguishers and spill containment equipment, such as absorbents.
  - Should a spill contaminate soil, the soil shall be put into containers and disposed of in accordance with local, state, and federal regulations.
  - All containers used to store hazardous materials shall be inspected at least once per week for signs of leaking or failure.
- In the event that contaminated soil and/or groundwater is encountered during construction related earth-moving activities, all work shall be halted until a professional hazardous materials specialist or other qualified individual assesses the extent of contamination. If contamination is determined to be hazardous, the Tribe shall consult with the USEPA to determine the appropriate course of action, including development of a Sampling and Remediation Plan if necessary. Contaminated soils that are determined to be hazardous shall be disposed of in accordance with federal regulations.
The Tribe or the Tribe’s contractor will contact SunLine Transit Agency at least thirty days in advance of work commencing so that arrangements can be made to remove, replace, and/or relocate the existing bus stop facilities within the site (bench and waste container for bus stops #234 and #46).

The Tribe will remove, replace, and/or relocate bus stops #234 and #46 in coordination with SunLine Transit Agency. The relocated and/or replaced bus stops will be designed to meet the needs of all passengers, including the disabled, seniors, and children.

### 2.3 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative consists of the transfer of the North Site into federal trust status for gaming purposes for the benefit of the Tribe and the subsequent development of a casino on the site. Under the Reduced Intensity Alternative, the casino would include 40,000 sf of gaming floor space, parking, and mixed-use facilities, including a combination of tribal government office space, restaurants, and retail uses totaling 103,000 sf of development. The Reduced Intensity Alternative is similar to the Proposed Project, except that mixed-use facilities would be reduced in size when compared to the Proposed Project Alternative as described within the EA. A breakdown of the facilities proposed under the Reduced Intensity Alternative is provided in Table 2-3, and the proposed site plan is provided as Figure 2-4 of Appendix D.

#### TABLE 2-3 REDUCED INTENSITY ALTERNATIVE COMPONENTS

<table>
<thead>
<tr>
<th>Component</th>
<th>Units</th>
<th>Approximate Square Footage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Casino</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gaming Floor</td>
<td>500 Class III gaming devices and 8 table games</td>
<td>40,000</td>
</tr>
<tr>
<td>Back of House/Support</td>
<td></td>
<td>17,500</td>
</tr>
<tr>
<td>Restaurants</td>
<td></td>
<td>5,000</td>
</tr>
<tr>
<td>Retail</td>
<td></td>
<td>2,500</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>65,000</strong></td>
</tr>
<tr>
<td>Mixed-Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building D</td>
<td></td>
<td>13,000</td>
</tr>
<tr>
<td>Building E</td>
<td></td>
<td>25,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>38,000</strong></td>
</tr>
<tr>
<td>Overall Project Total</td>
<td></td>
<td><strong>103,000</strong></td>
</tr>
<tr>
<td>Parking (surface only)</td>
<td></td>
<td>~850 spaces</td>
</tr>
</tbody>
</table>


As with the Proposed Project Alternative, the Reduced Intensity Alternative would be open 24 hours a day, 7 days a week. The Reduced Intensity Alternative would employ fewer people (480 direct employment opportunities) and attract fewer patrons than the Proposed Project Alternative. The casino would have approximately 500 Class III gaming machines devices, and 8 table games. Water supply, wastewater treatment and disposal, grading and drainage, roadway access, public health and safety standards, fire protection, and law enforcement under the Reduced Intensity Alternative would be similar to the Proposed Project Alternative (Section 2.2.2) but with a reduced demand for services due to the smaller development size. The construction methods and BMPs for the Reduced Intensity Alternative would be identical to those described for the Proposed Project Alternative (Section 2.2.3).

In addition to the roadway access design construction described for the Proposed Project Alternative (refer to Section 2.2.2), the eastern project driveway contemplated under the Reduced Intensity Alternative at Buddy Rogers Avenue would be restriped with a one-way stop control to provide one shared left-right turn northbound lane; one shared through-right eastbound lane; and one shared left-through westbound lane.
2.4 NON-GAMING ALTERNATIVE

The Non-Gaming Alternative consists of the transfer of the North Site into federal trust status for the benefit of the Tribe and the subsequent development of commercial uses on the site, including a combination of tribal government office space, restaurants, and retail uses totaling 90,000 sf of development. A breakdown of the facilities proposed under the Non-Gaming Alternative is provided in Table 2-4, and the proposed site plan is provided as Figure 2-5 of Appendix D.

<table>
<thead>
<tr>
<th>Component</th>
<th>Units</th>
<th>Approximate Square Footage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixed-Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building A</td>
<td></td>
<td>9,500</td>
</tr>
<tr>
<td>Building B</td>
<td></td>
<td>4,500</td>
</tr>
<tr>
<td>Building C</td>
<td></td>
<td>6,500</td>
</tr>
<tr>
<td>Building D</td>
<td></td>
<td>12,500</td>
</tr>
<tr>
<td>Building E</td>
<td></td>
<td>20,000</td>
</tr>
<tr>
<td>Building F</td>
<td></td>
<td>5,000</td>
</tr>
<tr>
<td>Building G</td>
<td></td>
<td>5,000</td>
</tr>
<tr>
<td>Building H</td>
<td></td>
<td>10,000</td>
</tr>
<tr>
<td>Building I</td>
<td></td>
<td>12,000</td>
</tr>
<tr>
<td>Building J</td>
<td></td>
<td>5,000</td>
</tr>
<tr>
<td>Overall Project Total</td>
<td></td>
<td>90,000</td>
</tr>
<tr>
<td>Parking</td>
<td>~700 spaces</td>
<td></td>
</tr>
</tbody>
</table>


The Non-Gaming Alternative would employ fewer people (313 direct employment opportunities) and attract fewer patrons than the Proposed Project Alternative as described within the EA. Water supply, wastewater treatment and disposal, grading and drainage, roadway access, public health and safety standards, fire protection, and law enforcement under the Non-Gaming Alternative would be similar to the Proposed Project Alternative (Section 2.2.2), but with a reduced demand for services due to the smaller development size. The construction methods and BMPs for the Non-Gaming Alternative would be identical to those described for the Proposed Project Alternative (Section 2.2.3).

In addition to the roadway access design construction described for the Proposed Project Alternative (refer to Section 2.2.2), the eastern project driveway contemplated under the Non-Gaming Alternative at Date Palm Drive would be restriped with a one-way stop control to provide three through northbound lanes; two through and one shared through-right southbound lanes; and one right turn eastbound lane.

2.5 NO ACTION ALTERNATIVE

Under the No Action Alternative, none of the development alternatives would be implemented. No land would be placed in federal trust for the benefit of the Tribe, and no development would occur.

2.6 COMPARISON OF THE ALTERNATIVES

- **Proposed Project Alternative.** Among the project alternatives considered, the Proposed Project Alternative, which is fully evaluated in Section 4.0, would best meet the Tribe’s objectives and would provide the greatest socioeconomic benefit to the Tribe and City.

- **Reduced Intensity Alternative.** This alternative would result in similar effects to the environment as the Proposed Project Alternative but would provide the Tribe and the community with less economic benefit than the Proposed Project Alternative. Potential effects associated with traffic, air, and noise would be
less due to the smaller sized mixed use development that would be constructed under the Reduced Intensity Alternative.

- **Non-Gaming Alternative.** This alternative would result in similar effects to the environment as the Proposed Project Alternative but would provide the Tribe and the community with less economic benefit than the Proposed Project Alternative. Potential effects associated with traffic, air, and noise would be greater due to the higher volume of traffic generated by the retail and restaurants uses under the Non-Gaming Alternative.

- **No Action Alternative.** Under the No Action Alternative, the North Site would remain in its existing condition and would not be taken into trust. No environmental effects would occur. Under the No Action Alternative, the Tribe would not achieve any of the economic benefit that would be achieved with development of the Proposed Project Alternative. Moreover, the Tribe would not be able to utilize its landholdings in a manner that would most benefit its members. This alternative would be less preferable than the Proposed Project Alternative since it would not meet the stated purpose and need of facilitating tribal self-sufficiency, self-determination, and economic development.

### 2.7 ALTERNATIVES ELIMINATED FROM FURTHER ANALYSIS

The intent of the analysis of alternatives in the EA is to present to decision makers and the public a reasonable range of alternatives that are both feasible and sufficiently different from each other in critical aspects. Alternatives were considered and excluded from full EA analysis either because these alternatives were deemed infeasible, would not fulfill the stated purpose and need of the Proposed Action, and/or were not sufficiently distinguishable from the project alternatives that the analysis would offer additional information to assist the BIA in its consideration of impacts under NEPA. A number of potential off-site alternatives were considered but ultimately eliminated due to either the infeasibility of acquiring new off-site properties, the unavailability of off-site properties currently owned by the Tribe for development, or inability of these alternatives to lessen the environmental consequences of the Proposed Project Alternative. These eliminated alternatives are discussed in detail below.

#### 2.7.1 SOUTH SITE ALTERNATIVE

The South Site Alternative would develop a 13.9-acre property located immediately south of the North Site with development sized similarly to the Proposed Project Alternative. A detailed description of this alternative is provided within Appendix A, as well as a full analysis of the potential environmental effects of the South Site Alternative. This alternative was ultimately eliminated based on the conclusion that it would not eliminate any of the significant effects of the Proposed Project Alternative (as shown in the analysis provided in Alternative A), and would not as effectively meet the purpose and need (as stated in Section 1.2) because the Tribe does not currently own the site. The South Site is identified within the figures provided in Appendix D and Appendix H, and the full analysis prior to elimination is included in Appendix A.

#### 2.7.2 OTHER ALTERNATIVE SITES

In addition to the South Site, off-site alternatives were considered that would involve a gaming development on (1) trust land already owned by the Tribe, (2) fee land already owned by the Tribe, or (3) land purchased for use. As described in Section 1.3, although the Tribe’s Reservation encompasses over 30,000 acres, the total amount of tribally-owned land that is available for development of any kind is extremely small. The total amount of tribally-owned land that is available for gaming development is even smaller. The Tribe’s total inventory of land that could be developed for any non-residential commercial purpose is approximately 480 acres. Of these 480 acres, approximately 214 acres is not eligible for a gaming project because it is land acquired in trust after 1988 that does not currently meet any of the exceptions provided in the IGRA; approximately 243 acres are either already developed or is subject to a development plan that does not contemplate a gaming use; approximately 10 acres house the existing Tribal cemetery including planned future expansion; and approximately 13.6 acres is the North Site, analyzed as the Proposed Project Alternative, above.

Further, the cost of re-acquiring new parcels that are located in Palm Springs, Cathedral City, and Rancho Mirage is extremely high, compared to other parts of the country. Due to high acquisition costs and the location of
several desirable resort communities within the Reservation boundaries, it is extremely difficult for the Tribe to re-acquire lands on the Reservation. The median price per acre in Palm Springs has climbed from a recession low in 2009 of $1,011,236 per acre to almost pre-recession levels. The median price per acre in 2017 year-to-date is now at $2,387,097. The pre-recession median price per acre in 2007 was $2,477,632. Generally speaking, these prices far outpace real estate prices on and near Indian reservations in other parts of the country.

In addition to the land restrictions described above, the majority of tribal trust and fee land located on (and off) the Reservation is not suitable for development of this kind for one or more of the following reasons: (1) it has already been developed, (2) it is subject to land planning agreements between the Tribe and other jurisdictions or habitat conservation limitations which do not support such a land use, (3) it is not suitable for development because of its size or its location in inaccessible and/or rugged mountain terrain, (4) it lacks infrastructure necessary for development, or (5) some combination of these issues. The majority (approximately 8,640 acres) of tribally-owned trust and fee lands are located within the Santa Rosa and San Jacinto National Monument and are undevelopable. In total, development restrictions apply to approximately 14,718 acres of tribal trust and tribal fee land, located both on and off-Reservation, making those lands unsuitable for the proposed gaming development.

As described above, additional off-site alternatives are not feasible for a variety of reasons, including restrictions on existing tribally-owned lands, high acquisition costs of new parcels in the vicinity, and suitability for development on existing tribally-owned lands. Further, any off-site alternatives outside of the area identified by the City would not fulfill the joint vision of the City, Tribe, and CURC to redevelop and eliminate conditions of blight in downtown. As noted in Section 1.5, the CURC and City have emphasized the importance of the proposed facility including a gaming component as an anchor to enable further growth of a walkable Downtown/Art and Design Village.

Moreover, as described in detail in other sections of this EA, the Tribe’s preferred trust site (the North Site), is an infill site that has previously been developed and lacks sensitive resources. All environmental effects of the Proposed Project Alternative can be reduced to less than significant levels with mitigation. Thus, the consideration of a third alternative site would be unlikely to substantially reduce or lessen the environmental effects of the project, and thus would not aid the BIA in its consideration of a reasonable range of alternatives under NEPA.
## SECTION 3.0

### AFFECTED ENVIRONMENT

A detailed description of the Affected Environment, including applicable regulations and the environmental setting of the North Site (Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative) is provided in Appendix H. Please note that Appendix H also includes the environmental setting for the South Site, which was ultimately eliminated from consideration, as described in Section 2.7 and Appendix A. Table 3-1 summarizes key characteristics of the potentially affected environmental setting on the North Site. The following environmental issue areas are described: Land Resources, Water Resources, Air Quality, Biological Resources, Cultural Resources, Socioeconomic Conditions/Environmental Justice, Transportation/Circulation, Land Use, Public Services and Utilities, Visual Resources, Noise, and Hazardous Materials.

### TABLE 3-1

<table>
<thead>
<tr>
<th>Resource Area</th>
<th>Summary of Environmental Setting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land Resources</td>
<td>- Relatively level topography on the North Site, with a gradual slope down to northeast corner.</td>
</tr>
<tr>
<td></td>
<td>- North Site is approximately 300 feet above mean sea level.</td>
</tr>
<tr>
<td></td>
<td>- Nearest mapped fault is the Garnet Hill fault, located 5 miles north of the North Site.</td>
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<td></td>
<td>- Lateral spreading and other earthquake-induced ground failures are unlikely on the North Site.</td>
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<td></td>
<td>- Soils on the North Site include Carsitas gravelly sand and Carsitas cobbly sand, which both are</td>
</tr>
<tr>
<td></td>
<td>excessively drained and have a high hydraulic conductivity, low erosion potential, and high wind</td>
</tr>
<tr>
<td></td>
<td>erosion potential. These soils are not expansive and have a low shrink-swell potential.</td>
</tr>
<tr>
<td></td>
<td>- Soils have low liquefaction susceptibility; high seismically-induced settlement susceptibility;</td>
</tr>
<tr>
<td></td>
<td>unlikely lateral spreading and ground failures; deep, excessively-drained soils with low runoff</td>
</tr>
<tr>
<td></td>
<td>potential; high susceptibility to wind erosion; high rate of water transmission; moderate to</td>
</tr>
<tr>
<td></td>
<td>near-severe wind erosion hazard zone; low shrink-swell potential; moderate corrosivity to steel;</td>
</tr>
<tr>
<td></td>
<td>flooding and ponding not probable; high saturated hydraulic conductivity.</td>
</tr>
<tr>
<td>Water Resources</td>
<td>- Located within Flood Zone X (outside 100-year floodplain, within 500-year floodplain).</td>
</tr>
<tr>
<td></td>
<td>- The North Site is within the Cathedral Canyon-Whitewater River Subwatershed of the Upper</td>
</tr>
<tr>
<td></td>
<td>Whitewater River Watershed, within the Whitewater River Subbasin of the Salton Sea Basin.</td>
</tr>
<tr>
<td></td>
<td>- The nearest surface water body is the Whitewater River, approximately 0.1 mile northeast of the</td>
</tr>
<tr>
<td></td>
<td>site.</td>
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<tr>
<td></td>
<td>- Nearest 303(d) impaired surface water body is 10.2 miles east of the North Site; contaminants</td>
</tr>
<tr>
<td></td>
<td>of concern in the groundwater subbasin include mineral concentration, salinity, total dissolved</td>
</tr>
<tr>
<td></td>
<td>solids, arsenic, chromium-6, uranium, nitrate, and perchlorate.</td>
</tr>
<tr>
<td></td>
<td>- Drainage is by overland sheet flow on site to the northern and northeastern boundaries, and</td>
</tr>
<tr>
<td></td>
<td>existing gutters and storm drains convey stormwater to the North Cathedral Channel (Appendix G).</td>
</tr>
<tr>
<td></td>
<td>- An existing storm drain runs south-to-north through the North Site beneath Allen Avenue from</td>
</tr>
<tr>
<td></td>
<td>Date Palm Drive to the North Cathedral Channel.</td>
</tr>
<tr>
<td></td>
<td>- The underlying groundwater subbasin (Indio Subbasin, located within the Coachella Valley</td>
</tr>
<tr>
<td></td>
<td>Groundwater Basin) is overdrafted; DWA and CVWD use imported water to supplement the groundwater</td>
</tr>
<tr>
<td></td>
<td>supply.</td>
</tr>
<tr>
<td></td>
<td>- Recharge to the groundwater subbasin occurs primarily from surface runoff and subsurface inflow.</td>
</tr>
<tr>
<td></td>
<td>- Contaminants of concern within the groundwater subbasin include mineral concentration, salinity,</td>
</tr>
<tr>
<td></td>
<td>total dissolved solids (TDS), arsenic, chromium-6, uranium, nitrate, and perchlorate.</td>
</tr>
<tr>
<td>Air Quality</td>
<td>- The North Site is within the Riverside County – Coachella Valley region of the Salton Sea Air</td>
</tr>
<tr>
<td></td>
<td>Basin (SSAB), which is designated by the USEPA as nonattainment for ozone and PM&lt;sub&gt;10&lt;/sub&gt;</td>
</tr>
<tr>
<td></td>
<td>National Ambient Air Quality Standards (NAAQS).</td>
</tr>
<tr>
<td></td>
<td>- Emissions of criteria air pollutants (CAPs) in the vicinity of the site are primarily from</td>
</tr>
<tr>
<td></td>
<td>mobile transportation sources.</td>
</tr>
<tr>
<td></td>
<td>- Sensitive air quality receptors include children, the elderly, people with illnesses, or others</td>
</tr>
<tr>
<td></td>
<td>sensitive to the effects of air pollutants. This includes hospitals, schools, convalescent</td>
</tr>
<tr>
<td></td>
<td>facilities, and residential areas.</td>
</tr>
<tr>
<td></td>
<td>- Air quality sensitive receptors in the vicinity of the site include: residential areas (440</td>
</tr>
<tr>
<td></td>
<td>feet northwest and 500 feet southwest), and parks (25 feet north). The nearest school is 4,000</td>
</tr>
<tr>
<td></td>
<td>feet north of the site.</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>- North Site and surrounding areas are entirely disturbed/developed in an urban area, including</td>
</tr>
<tr>
<td></td>
<td>structures, paved parking areas, remnant bisecting roadways, power poles, hydrants, manhole</td>
</tr>
<tr>
<td></td>
<td>covers, roofing tile fragments, plowed soil, and gravel.</td>
</tr>
<tr>
<td>Resource Area</td>
<td>Summary of Environmental Setting</td>
</tr>
<tr>
<td>---------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Socioeconomic Conditions/Environmental Justice     | - The City had a labor force of 24,805 and an unemployment rate of 9.9 percent in 2016.  
- In 2017, the City’s population was 54,596, which is a 6.52 percent increase from the City’s 2010 population level.  
- In 2016, the City had a 19 percent vacancy rate, which is expected to decline in the next five years.  
- The assessed value of the North Site for FY 17-18 is $8,515,491.00, with collected property taxes of $105,367 (Appendix E).  
- The two closest gaming facilities are owned by the Tribe. The next nearest is 15 miles southeast, owned by the Cabazon Band of Mission Indians. Four additional facilities are located within 50 miles of the site.  
- The North Site is within the Palm Springs Unified School District (PSUSD) service boundary, which enrolled 10,625 students in the 2017-18 school year; the closest public school is 4,000 feet north of the site.  
- The closest library is 1.6 miles north of the site.  
- The closest park is located adjacent to the northern boundary of the site.  
- The Census tract that encompasses the site is contains a minority population (55.0 percent); members of the Tribe are also considered a minority population. Several adjacent Census tracts also contain substantial minority populations.  
- No low-income communities are located in the vicinity of the North Site. |
| Transportation/ Circulation                        | - 29 intersections and 10 roadway segments were analyzed in the Traffic Impact Analysis (TIA; Appendix K).  
- The peak hour periods were determined to be the PM peak hour (4:00 to 5:00 pm) and the Saturday midday peak hour (1:00 to 2:00 pm) based on traffic counts conducted at similar casinos.  
- Level of service (LOS) D is considered to be acceptable based on local General Plan documents.  
- Cathedral Canyon Drive and Paseo Real does not operate acceptably in existing conditions; all other study intersections and roadway segments do operate acceptably.  
- There are two bus stops adjacent to the North Site on East Palm Canyon Drive at Allen Avenue and Date Palm Drive at Grove Street, which are served by Sunline Transit Agency Routes 30 and 111.  
- Sidewalks are generally located nearby, including along Date Palm Drive and East Palm Canyon Drive.  
- Bike lanes are not generally located along study area roadways, except along certain roadways, including Frank Sinatra Drive. |
| Land Use                                           | - The North Site is designated for Downtown Commercial (DTC) land uses (City General Plan), and for Downtown/Art and Design Village development (Date Palm Drive Corridor Connector Plan, Date Palm Drive Specific Plan).  
- The North Site is zoned by the City for Mixed Use Commercial (MXC) and Downtown Residential Neighborhood (DRN).  
- City Council Resolution 2017-44 supports the Tribe’s use of the North Site for gaming purposes.  
- The North Site is located within the incorporated boundaries of the City of Cathedral City, in Riverside County.  
- The North Site is adjacent to East Palm Canyon Drive (Highway 111), which provides local access to the City, along with Interstate 10 (I-10). |
### Resource Area

**Public Services and Utilities**

- The North Site is comprised of 66 County tax parcels, and is bound by Buddy Rogers Avenue to the north, Date Palm Drive to the east, and East Palm Canyon Drive to the south. Adjacent parcels are to the west.
- The entire North Site has been previously developed, however, most structures have been demolished. Existing roadways and infrastructure remain within the site, including paved roadways, utilities, and gravel lots. Two buildings remain on the North Site: the fire station at the northeast corner (which the City is relocating to parcels north of the site) and a fast food restaurant (Carl’s Jr) at the southeast corner of the site.
- Adjacent land uses include commercial, park, and undeveloped land; zoned MXC and DRN, with some Open Space, Planned Community Commercial, and Commercial Tourist and Recreation east of the site.

- The North Site contains or is adjacent to existing water supply infrastructure (12-inch mains run along the north and east boundaries of the North Site beneath Buddy Rogers Avenue and Date Palm Drive, with 6- and 8-inch mains located within the site), wastewater collection infrastructure (12-inch main along Date Palm Drive, with 8-inch branch lines from this main running west along Grove Street through the site and north along Monty Hall Drive to the North Cathedral Channel, and east to a lift station near the intersection of Date Palm Drive and Buddy Rogers Avenue), electricity infrastructure (underground utility lines run through the site, and electrical poles are located along Allen Avenue, Buddy Rogers Avenue, Grove Street, and Dawes Street), and natural gas infrastructure (high pressure distribution lines beneath East Palm Canyon Drive and Date Palm Drive).
- No existing sources of vibration are located near the North Site ranged between 55.0 to 67.2 dBA Leq.
- No existing sources of lighting, shadow, or glare are currently present on the site.
- No significant existing sources of noise are present in the vicinity of the site.
- The nearest parks (Second Street Park and Cathedral City Dog Park) are located 25 feet north of the site.
- SCE provides electricity to the site, from SCE’s Sumac 12kV Circuit and the Tamarisk 115/12 kV Substation (1.1 miles northeast of the site), which has a total generation capacity of 112.0 MW.
- SoCalGas provides natural gas service to the site.
- The North Site is within the service area of the CCPD (headquarters located less than 0.2 miles from the site). CCPD’s patrol division includes 1 lieutenant, 3 sergeants, and 25 patrol officers; and responds to an average of 42,500 calls per year.
- CCFD serves the site, with the closest CCFD station currently located on the North Site to be moved across Buddy Rogers Avenue immediately adjacent to the site. CCFD employs 40 individuals, 36 of which work in fire suppression or paramedic units. In 2016, CCFD responded to 5,660 incidents, including fire and medical emergency calls.
- The closest 24-hour medical facility is the Eisenhower Medical Center 3.0 miles east of the site, which has plans for expansion.

**Visual Resources**

- The North Site consists of empty gravel lots (with two remaining structures at the northeast and southeast corners of the site) located within downtown Cathedral City.
- The North Site is visible in the background from an apartment building located 440 feet to the northwest and single-family homes 500 feet southwest. Vehicles along local roadways can also view the site.
- There are no scenic resources immediately adjacent to or within the North Site.
- Viewsheds of the site include from Date Palm Drive and Palm Canyon Drive and along Buddy Rogers Drive, as shown in Figures 3.10-1 and 3.10-2 of Appendix D.
- No state scenic highways are adjacent to or in the vicinity of the site.
- No significant existing sources of lighting, shadow, or glare are currently present on the site.

**Noise**

- The City General Plan Noise Element has the following standards: 55 A-weighted decibels (dBA) community noise equivalent level (CNEL) for residences, 62.5 dBA CNEL for parks, and 62.5 dBA CNEL for commercial developments.
- Existing traffic is the primary source of ambient noise at the site. Noise measurement data is included in Appendix L and summarized in Appendix H. 24-hour ambient noise measures taken in the vicinity of the site ranged between 55.0 to 67.2 dBA Leq.
- No existing sources of vibration are located near the North Site.
- Noise-sensitive land uses include residential housing, schools, and health care facilities.
- The nearest noise sensitive receptors include residences 440 feet northwest and 500 feet southwest, parks 25 feet north, and commercial facilities adjacent to the western boundary and 100 feet east.
<table>
<thead>
<tr>
<th>Resource Area</th>
<th>Summary of Environmental Setting</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>▪ Peak particle velocity (PPV) is the maximum instantaneous peak (inches per second) of the vibration signal, which is used to estimate Lv or VdB levels (vibration decibels with a reference velocity of one micro-inch per second).</td>
</tr>
<tr>
<td></td>
<td>▪ The Federal Transportation Administration’s (FTA’s) guideline vibration damage criteria for buildings is 90 VdB.</td>
</tr>
<tr>
<td></td>
<td>▪ The FTA’s guideline for maximum vibration at sensitive receptors is 70 VdB.</td>
</tr>
<tr>
<td></td>
<td>▪ Background vibration velocity in residential areas is usually 50 VdB or lower.</td>
</tr>
<tr>
<td>Hazardous Materials</td>
<td>▪ No visible signs of gross contamination, odors indicative of hazardous materials releases, or asbestos-containing materials observed during the December 2017 site visit; but concrete water lines and crushed in-place concrete septic tanks may contain asbestos.</td>
</tr>
<tr>
<td></td>
<td>▪ A Phase I Environmental Site Assessment (ESA) identified one historical recognized environmental conditions (HREC) and five potential recognized environmental conditions (RECs) within the North Site. The HREC former leaking underground storage tank (LUST) case was closed in 2006. The five potential RECs included three historic auto stations, one gasoline service station, and the existing fire station. These five sites were recommended to be evaluated for potential petroleum hydrocarbon contamination. (Appendix M)</td>
</tr>
<tr>
<td></td>
<td>▪ A Limited Phase II Environmental Evaluation, conducted in 2017, identified underground storage tanks (USTs) and/or remnants of UST excavation. One former UST excavation site was identified and recommended for subsurface assessment for petroleum hydrocarbon soil residues, and the remaining four sites were not considered RECs. (Appendix M)</td>
</tr>
<tr>
<td></td>
<td>▪ The 2018 Phase of the Limited Phase II collected 12 soil boring samples to test for total petroleum hydrocarbons (TPH), lead, and pH in January 2018. All samples’ results were below the screening level for TPH, lead was not detected in any of the samples, and pH was determined to be moderately to strongly alkaline. No further testing was recommended. (Appendix M)</td>
</tr>
</tbody>
</table>
SECTION 4.0
ENVIRONMENTAL CONSEQUENCES

This section assesses the environmental consequences of the Proposed Project Alternative, Reduced Intensity Alternative, Non-Gaming Alternative, and No Action Alternative, described in Section 2.0. Effects are measured against the environmental baseline, which is briefly summarized in Section 3.0 and described in detail in Appendix H. Indirect and cumulative effects are identified in Section 4.13. Measures to mitigate for adverse impacts identified in this section are presented in Section 5.0.

4.1 LAND RESOURCES
4.1.1 PROPOSED PROJECT ALTERNATIVE

Topography
The topography of the North Site is relatively flat and only interrupted by an elevated pad that lies between Dawes Street and East Palm Canyon Drive (Highway 111). The majority of the structures proposed for development under the Proposed Project Alternative would be built north of East Palm Canyon Drive and east of Allen Avenue, bridging the elevated pad, but overall on levelled ground (see Figure 2-3 of Appendix D).

The Proposed Project Alternative would involve grading within the project footprint discussed in Section 2.2 and would require an import of 91,933 cy of fill material. Topographic features of the site would be altered by earthwork. However, changes to topography resulting from leveling the site would not affect significant existing topographic features on the North Site, as there are none. The final grading plan would be in compliance with standard engineering practices. The site has no topographic problems that would affect the grading of the site, such as shallow bedrock, wetlands, or high groundwater conditions. With preparation of and adherence to the measures within a grading plan, development of the Proposed Project Alternative would not result in an adverse impact to topography. No mitigation is required.

Geology/Soils
Soils within the North Site have low shrink-swell potential, which indicates that soil reclamation or special design measures should not be required (NRCS, 2018). Given that the site was formerly developed primarily as a residential community, it is likely that existing soils on the site are capable and suitable for the proposed uses. With preparation of and adherence to measures within the final grading plan prepared by a qualified engineer (refer to Section 2.2.2), these soils would not preclude development of the site and impacts would be less than significant.

The soils on the areas of the North Site that will be developed have been characterized as moderately corrosive to steel, as well as moderately corrosive to concrete (NRCS, 2018). In anticipation of these soil limitations, the final project design will incorporate protective measures to minimize adverse impacts relative to soil corrosivity. These measures include non-corrosive materials and/or protective coatings for buried facilities to be used for construction in corrosive soils per CBC requirements. With incorporation of these protective measures, impacts resulting from corrosive soils will be less than significant.

The Proposed Project Alternative could affect soils due to erosion during construction, operation, and maintenance activities. Such construction activities could include clearing, grading, trenching, and backfilling. Site grading would further expose soils on the North Site to erosion by water and wind. Under the Proposed Project Alternative, approximately 12.24 acres of the North Site will become impervious.

Table 3-1 of Section 3.0 describes the soil types, erosion potential, permeability, and general gradients for the soil units mapped on the site. The Carsitas gravelly sand and cobbly sand soil types are only slightly susceptible to water erosion, while the entire North Site is susceptible to wind erosion.
Sediment discharge into navigable (surface) Waters of the U.S. is regulated by the CWA, which establishes water quality goals for sediment control and erosion prevention for any project that would disturb more than 1 acre of soil. One of the mechanisms for achieving the goals of the CWA is the NPDES permitting program, administered by the USEPA. As part of the NPDES General Construction Permit, a SWPPP must be prepared and implemented. The SWPPP must make provisions for (1) erosion prevention and sediment control and (2) control of other potential pollutants. Construction of the Proposed Project Alternative would disturb more than one (1) acre; therefore, the Tribe is required by the CWA to obtain coverage under, and comply with the terms of, the NPDES General Construction Permit for construction activities subsequent to federal trust property acquisition of the North Site.

The NPDES General Construction Permit requirements would reduce any potential adverse impacts to less-than-significant levels. With regulatory requirements and BMPs described in Section 2.2.3, impacts from implementation of the Proposed Project Alternative on soils and geology would be minimal and, therefore, less than significant.

Seismic Hazards
The North Site is not located on any known active fault trace; thus, the risk of fault rupture is low. The Garnet Hill fault, the nearest fault, is located approximately five miles north of the North Site (DOC, 2007). As described in Section 2.2.2, all structures would conform to the applicable building code requirements of the CBC and CPSC, including building, electrical, energy, mechanical, plumbing, fire protection, and safety as adopted under the Tribal Building and Safety Code (Tribal Ordinance No. 26). Use of the CBC, CPSC, and Tribal Building and Safety Code design and construction standards would allow ground shaking-related hazards to be managed from a geologic, geotechnical, and structural standpoint such that adverse impacts to the health or safety of workers or members of the public would be minimized. Therefore, no adverse impacts due to geologic or seismic conditions on site would occur.

4.1.2 Reduced Intensity Alternative
Impacts to land resources under the Reduced Intensity Alternative would be the same as under the Proposed Project Alternative (refer to Section 4.1.1). Fewer structures would be built, but the remaining portions of the North Site would then be used for parking, resulting in the same amount of soil and topography manipulation as the Proposed Project Alternative. The Reduced Intensity Alternative would comply with the applicable NPDES General Construction Permit requirements and BMPs described in Section 2.2.3, which would ensure that the Reduced Intensity Alternative would have minimal impacts on soils within the North Site. Therefore, impacts resulting from seismic conditions would be the same as under the Proposed Project Alternative.

4.1.3 Non-Gaming Alternative
Impacts to land resources under the Non-Gaming Alternative would be the same as under the Proposed Project Alternative (refer to Section 4.1.1). The entire North Site would be developed, and the same amount of soil and topography manipulation would be required for this alternative when compared to the Proposed Project Alternative. The Non-Gaming Alternative would comply with the applicable NPDES General Construction Permit requirements and BMPs described in Section 2.2.3, which would ensure that this alternative would have minimal impacts on soils within the North Site. Therefore, impacts resulting from seismic conditions would be the same as under the Proposed Project Alternative.

4.1.4 No Action Alternative
Under the No Action Alternative, the North Site would not be taken into trust and no development would occur. The site would remain in its current state. Therefore, topographic features and soils would remain undisturbed and the No Action Alternative would have no adverse impacts related to land resources.
4.2 WATER RESOURCES

4.2.1 PROPOSED PROJECT ALTERNATIVE

Surface Water

Construction Impacts

Construction impacts under the Proposed Project Alternative would include ground-disturbing activities such as grading and excavation, which could lead to erosion of topsoil. Erosion from construction sites can increase sediment discharge to surface waters during storm events, thereby degrading downstream water quality. Construction activities would also include the routine use of potentially hazardous construction materials such as concrete washings, oil, and grease, which may spill onto the ground and be dissolved in stormwater. Discharges of pollutants, including grease, oil, fuel, and sediments, to surface waters from construction activities and accidents are a potentially significant impact. Regulated construction activities in excess of one (1) acre are required to apply for coverage under the NPDES General Construction Permit. The provisions of this permit include preparation of a SWPPP, which would be developed prior to any ground disturbance and would include BMPs to reduce potential surface water contamination during storm events. A list of BMPs that may be included in the SWPPP and that would be implemented during construction of the Proposed Project is presented in Section 2.2.3. These BMPs would minimize adverse impacts to the local and regional watershed from construction activities associated with the Proposed Project Alternative by reducing detachment of soil particles from bare soil or by preventing movement of loose soil into waterways. With adherence to the NPDES permitting program and implementation of the SWPPP, impacts to surface water quality from construction activities would be less than significant.

Operation

Water Supply

The water supply for the Proposed Project Alternative would be provided through the DWA, which, as described in Appendix H derives the majority of its water supply from groundwater. Based on the analysis provided in Appendix F, the operational potable water demand of the Proposed Project Alternative would not have a significant impact on any regional surface water supplies. Refer to the Groundwater – Water Supply subheading below for an analysis of the Proposed Project Alternative’s impacts on the regional groundwater supply. Refer to Section 4.9 for an analysis of impacts to water providers.

Stormwater Runoff

Pollutants that accumulate in dry periods, such as oil and grease, asbestos, pesticides, and herbicides, may adversely affect water quality because of their presence in high concentrations during the first storm event of the season. Development of the casino, mixed-used, and parking facilities would result in a greater area of impervious surfaces, approximately 12.24 total acres, potentially increasing stormwater runoff flow rates. An increase in impervious surfaces reduces infiltration of stormwater through the soil, and can cause an increase in on-site or off-site flooding or erosion by directing water towards areas that typically do not receive concentrated surface water runoff. As described in Section 2.2.2, in order to retain 100 percent of the stormwater flows associated with a 100-year, 3-hour storm event, the Proposed Project Alternative includes the installation of a total of approximately 2,010 linear feet of 96-inch perforated corrugated metal pipe surrounded by porous stone beneath the proposed parking lots in the northeast portion of the North Site. This retention facility would provide approximately 138,166 cubic feet of storage, which would be adequate to retain the approximately 137,244 cubic feet of flows associated with a 100-year, 3-hour storm event (Appendix G). Because all stormwater would be retained on site, impacts to surface water would not occur, and no mitigation is required.

Flooding

Impacts to the floodplain or floodplain management could occur if construction of the Proposed Project Alternative were to place people or structures in a floodplain or change flood elevations. The North Site is outside of a 100-flood zone as designated by the Federal Emergency Management Agency (FEMA; FEMA, 2017). Construction and operation of the Proposed Project Alternative would not alter the 100-year floodplain boundaries or flooding elevations. The North Site is located in Zone X, a 500-year floodplain designated by FEMA; however, there are no additional design or construction requirements for buildings in this zone (FEMA,
2005). Therefore, no adverse impact associated with flooding or floodplain management would occur as a result of the Proposed Project Alternative.

**Groundwater Water Supply**

As described in Section 2.2.2 and Appendix F, the Proposed Project Alternative has a projected average day potable water demand of approximately 33,929 gpd, or approximately 38 acre-feet per year (AFY). Potable water would be supplied to the Proposed Project Alternative by DWA, which, as stated above and in Appendix H, derives the vast majority of its potable water supply from groundwater pumped from the Indio (Whitewater) Subbasin. According to CVWD, in 2020, the western portion of the Coachella Valley Groundwater Basin (which encompasses the portion of the Indio Subbasin that underlies the North Site) is projected to experience total outflows of 177,400 AFY (CVWD, 2011). Operational water demand under the Proposed Project Alternative would constitute only approximately 0.02 percent of the total projected outflows in 2020. Therefore, operational water demand under the Proposed Project Alternative would have a less-than-significant impact on regional groundwater levels, and no mitigation is required.

The introduction of impervious surfaces to the North Site under the Proposed Project Alternative could prevent water from percolating to the underlying aquifer, resulting in lower rates of groundwater recharge. However, the stormwater features that have been incorporated into the project design would include perforated corrugated metal pipes surrounded by porous stone designed to capture and retain 100 percent of the stormwater flows associated with a 100-year, 3-hour storm event, which would allow stormwater to slowly permeate into the underlying groundwater aquifer, as described in Section 2.2.2. Therefore, with the incorporation of these features, no adverse effects due to groundwater recharge would occur.

**Water Quality**

Contaminated runoff from project facilities could infiltrate through the soil and potentially affect groundwater. As described in Section 2.2.2 and Appendix G, design of the Proposed Project Alternative includes the installation of grates and filter bags at the entrances to drainage inlets, which would remove trash, debris, and sediment from stormwater runoff. These features and the other potential LID techniques described (including bio-retention facilities, vegetated filter strips, and permeable pavement) would adequately filter runoff before it enters the groundwater table, assuring that the impact to groundwater quality from stormwater runoff would be less than significant.

4.2.2 **Reduced Intensity Alternative**

The location and size of the stormwater retention facilities developed under the Reduced Intensity Alternative would be the same as under the Proposed Project Alternative (refer to Section 4.2.1). Further, the Reduced Intensity Alternative would comply with the applicable NPDES General Construction Permit requirements and BMPs described therein (refer to Section 2.2.3). Therefore, impacts to surface water resources and groundwater quality from the development and operation of the Reduced Intensity Alternative would be less than significant, similar to the Proposed Project Alternative. Additionally, the Reduced Intensity Alternative would not place people or structures in a floodplain or change flood elevations; therefore, as with the Proposed Project Alternative, no adverse impact associated with flooding or floodplain management would occur as a result of the Reduced Intensity Alternative. In regards to groundwater supply, the Reduced Intensity Alternative would require approximately 5 percent less potable water than the Proposed Project Alternative, with an approximate average daily water demand of 32,159 gpd, or approximately 36 AFY. As described in Section 4.2.1, the Proposed Project Alternative would not have a significant adverse impact on groundwater levels; therefore, the Reduced Intensity Alternative, which would be supplied by the same source and has a lower water demand, would have a further reduced impact.

4.2.3 **Non-Gaming Alternative**

The location and size of the stormwater retention facilities developed under the Non-Gaming Alternative would be the same as under the Proposed Project Alternative (refer to Section 4.2.1). Further, the Non-Gaming Alternative would comply with the applicable NPDES General Construction Permit requirements and BMPs
described therein. Therefore, impacts to surface water resources and groundwater quality from the development and operation of the Non-Gaming Alternative would be less than significant, similar to the Proposed Project Alternative. Additionally, the Non-Gaming Alternative would not place people or structures in a floodplain or change flood elevations; therefore, as with the Proposed Project Alternative, no adverse impact associated with flooding or floodplain management would occur as a result of the Non-Gaming Alternative. In regards to groundwater supply, the Non-Gaming Alternative would require approximately 29 percent less potable water than the Proposed Project Alternative, with an approximate average daily water demand of 24,134 gpd, or approximately 27 AFY. As described in Section 4.2.1, the Proposed Project Alternative would not have a significant adverse impact on surface or groundwater levels; therefore, the Non-Gaming Alternative, which would be supplied by the same source and has a lower water demand, would have a further reduced impact.

4.2.4 NO ACTION ALTERNATIVE
Under the No Action Alternative, the North Site would not be taken into trust, and no development would occur. The site would remain in its current state. Therefore, the No Action Alternative would have no adverse impacts related to surface water or groundwater resources.

4.3 AIR QUALITY
4.3.1 METHODOLOGY
Development and operation of the Proposed Project Alternative would emit CAPs, hazardous air pollutants (HAPs), and GHGs. This section presents the methodology used to assess the affected environment and to evaluate the potential air quality effects of the project alternatives.

Assessment Criteria
Adverse effects to ambient air quality could result if either construction or operation would result in violations of the federal Clean Air Act (CAA) provisions, or if emissions would impede a state’s ability to meet NAAQS.

While the North Site is located within the SSAB and the South Coast Air Quality Management District’s (SCAQMD) jurisdictional boundaries, SCAQMD thresholds do not apply to federal actions. The effects of proposed federal actions on SCAQMD air quality management are assessed under General Conformity as required under the CAA.

Construction Analysis
Construction would entail mass earthwork, fine grading, and building, road, and parking lot construction. A variety of heavy equipment, including trucks, scrapers, excavators, and graders, would be used to complete each phase. A detailed list of the proposed equipment and emissions resulting from the equipment is located in Appendix N. Effects on air quality during construction were evaluated by estimating the amount of criteria pollutants that would be emitted over the duration of the construction period (for each phase of construction where applicable). Particulate matter 10 microns in diameter (PM$_{10}$) and ozone (O$_3$) precursors (NO$_x$ and reactive organic gases [ROG]) are the primary pollutant of concern resulting from operation of construction equipment, earth-moving activities, and soil hauling. Soil hauling trips, which are included in the 11,492 hauling trips for grading work, were calculated assuming the maximum 91,933 cy of fill material is required (Appendix G, Appendix N).¹ This provides for a conservative analysis.

ROG, nitrogen oxides (NO$_x$), sulfur dioxide (SO$_2$), carbon monoxide (CO), and DPM emissions from construction would primarily be produced by diesel-fueled equipment use from on and off-road construction equipment and truck use. Emissions from construction equipment were calculated using the USEPA approved 2016 California Emissions Estimator Model, Version 2016.3.2 (CalEEMod; CalEEMod, 2016). The majority of PM$_{10}$ and Particulate matter 2.5 microns in diameter (PM$_{2.5}$) emissions would result from fugitive dust generated during earth-moving activities, such as site grading. CalEEMod was used to estimate PM$_{10}$ and PM$_{2.5}$ project-related

¹ Note these values are for the Proposed Project Alternative. The Reduced Intensity Alternative included 9,082 hauling trips during grading, calculated from the maximum 72,653 cy of fill material; and the Non-Gaming Alternative included 12,327 hauling trips during grading, calculated from the maximum 98,965 of fill material (Appendix G, Appendix N).
emissions and precursors from equipment exhaust and fugitive dust. CAP emissions were estimated assuming that construction would begin in January 2019 and continue at an average rate of 22 days per month for all project alternatives. The construction duration for project alternatives is conservatively assumed to be approximately 12 months. Emissions results are summarized below and included in Appendix N.

Operational Analysis
CalEEMod was also used to estimate emissions associated with operation of the project alternatives. Input values for the CalEEMod included data from the TIA provided in Appendix K, water/wastewater estimates from Appendix F, and solid waste generation estimates from Section 4.9. Trip generation specific to each of the project alternatives provided in the TIA was incorporated into CalEEMod, including internal capture rates. The TIA estimated approximately 61 percent of retail patrons would patronize the casino or restaurant and 62 percent of restaurant patrons would patronize the casino or retail. Default trip length values included in CalEEMod were used for all land uses.

Appendix N includes additional details regarding CalEEMod inputs as well as the CalEEMod output files.

- **Federal General Conformity.** Conformity regulations apply to Federal actions that would cause emissions of CAPs to occur in locations designated as non-attainment or maintenance areas for the emitted pollutants. As discussed in Appendix H, the North Site is located in an area that is classified as severe nonattainment for ozone (NO, and ROG, ozone precursors) and PM_{10} under the NAAQS; therefore, if project emissions are equal to or exceed applicable de minimis levels for any CAP provided in 40 CFR §93.153 (b)(1) and (2), then a federal general conformity determination analysis would be required.

- **Carbon Monoxide Hot Spot Analysis.** Implementation of the project alternatives would result in emissions of CO. Because CO disperses rapidly with increased distance from the source, emissions of CO are considered localized pollutants of concern rather than regional pollutants, and can be evaluated by Hot Spot Analysis. “Hot Spots” include high traffic volume intersections with poor operating conditions resulting in extensive idling time for cars and subsequently can be concentrated areas with elevated CO levels. Refer to Appendix H for additional details related to Hot Spot analysis and screening criteria. The North Site is not in an area or category of site that has been identified in a CO plan. As shown in the TIA, provided as Appendix K, no intersection after mitigation would operate at LOS E or F. The North Site is not located in a CO nonattainment or maintenance area. Therefore, in accordance with 40 CFR §93.123, no further quantitative analysis is required.

- **Climate Change.** This EA considers whether project emissions have individual or cumulative effects on climate change. Given the global nature of climate change impacts, individual project impacts are most appropriately addressed in terms of the incremental contribution to a global cumulative impact; therefore, refer to in Section 4.13, cumulative effects, for the analysis of impacts related to climate change. This approach is consistent with the view articulated by the Intergovernmental Panel on Climate (IPCC) Change Fifth Assessment Report (IPCC, 2014).

- **Federal Class I Areas.** If any alternative emits greater than the Prevention of Significant Deterioration (PSD) threshold of 250 tons per year (tpy) of any one criteria pollutant from stationary sources during construction or operation then a best available control technology analysis will be conducted. San Gorgonio Wilderness, San Jacinto Wilderness, and Joshua Tree NP are within the preconstruction review distance of the North Site and analysis is required.

- **Tribal New Source Review (NSR).** The Tribe would be required to apply for a permit under the newly implemented NSR requirements of the CAA if stationary source operational emissions of regulated pollutants would exceed the thresholds presented in Table 3 of Appendix H. For this analysis, stationary source project-related operational emissions will be quantified and compared to the applicable threshold.

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2 While actual construction activities associated with the alternatives may be phased over a longer period, assuming that all construction would take place within a one-year condensed time frame results in a higher concentration of daily emission estimates, and thus is a conservative assumption.
4.3.2 PROPOSED PROJECT ALTERNATIVE
Construction Emissions
Construction of the Proposed Project Alternative would emit PM\textsubscript{10}, NO\textsubscript{x}, SO\textsubscript{2}, CO, ROG, and HAPs (primarily in the form of DPM) from the operation of construction equipment and earth-moving grading activities. Emissions from construction equipment have the potential to increase the concentration of DPM in the close vicinity (within approximately 500 feet) of the construction site, if control measures are not implemented.

Construction is assumed to occur 8 hours a day, 5 days a week. Unmitigated construction emission totals for the Proposed Project Alternative are shown in Table 4-1, and mitigated construction emission totals after the implementation of BMPs listed in Section 2.2.3 are shown in parentheses (also see Appendix N model output files).

<table>
<thead>
<tr>
<th>Construction Year – 2019</th>
<th>Criteria Pollutants (tpy)</th>
<th>ROG</th>
<th>NO\textsubscript{x}</th>
<th>CO</th>
<th>SO\textsubscript{2}</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Project Alternative</td>
<td>1.7 (1.5)</td>
<td>5.3 (4.3)</td>
<td>3.1 (3.2)</td>
<td>0.0 (0.0)</td>
<td>0.6 (0.4)</td>
<td>0.3 (0.2)</td>
<td></td>
</tr>
<tr>
<td>Reduced Intensity Alternative</td>
<td>1.5 (1.3)</td>
<td>5.0 (4.0)</td>
<td>3.1 (3.3)</td>
<td>0.0 (0.0)</td>
<td>0.6 (0.4)</td>
<td>0.3 (0.2)</td>
<td></td>
</tr>
<tr>
<td>Non-Gaming Alternative</td>
<td>1.6 (1.4)</td>
<td>5.4 (4.4)</td>
<td>3.1 (3.2)</td>
<td>0.0 (0.0)</td>
<td>0.6 (0.4)</td>
<td>0.3 (0.2)</td>
<td></td>
</tr>
<tr>
<td>De Minimis Levels</td>
<td>25</td>
<td>25</td>
<td>N/A</td>
<td>N/A</td>
<td>70</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Exceed Level?</td>
<td>No</td>
<td>No</td>
<td>N/A</td>
<td>N/A</td>
<td>No</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

Notes: N/A = Not Applicable; levels are not applicable due to attainment status (refer to Appendix H).
Mitigated emission levels after the implementation of BMPs in Section 2.2.3 are shown in parenthesis.
Source: CalEEMod, 2016.

As shown in Table 4-1, emissions of individual criteria pollutants from construction of the Proposed Project Alternative would not exceed applicable de minimis levels; therefore, a conformity determination is not required. However, to further reduce project-related construction criteria pollutants and DPM emissions, BMPs would be implemented by the Tribe and are listed in Section 2.2.3. These measures would reduce DPM emissions from construction equipment by approximately 85 percent, avoiding potentially adverse effects to nearby sensitive receptors. Therefore, construction of the Proposed Project Alternative would not result in significant adverse effects associated with the regional air quality environment.

Operational Emissions
Buildout of the Proposed Project Alternative would result in the generation of mobile emissions from patron, employee, and delivery vehicles, as well as area and energy criteria pollutant emissions from combustion of natural gas in boilers, stoves, heating units, and other equipment. Unmitigated operational emission totals for the Proposed Project Alternative are shown in Table 4-2. It should be noted that stationary and area sources are exempt under conformity regulations and therefore not subject to de minimis levels. Detailed calculations of vehicle and area emissions are included as Appendix N.

As shown in Table 4-2, operational emissions of individual criteria pollutants from the Proposed Project Alternative would not exceed applicable de minimis levels and emissions of individual criteria pollutants from stationary sources (area and stationary) would not exceed the Tribal NSR thresholds shown in Table 3 of Appendix H. Therefore, a conformity determination is not required and a Tribal NSR permit would not be required. Further, Table 4-2 shows that the Proposed Project Alternative would not result in stationary source emissions (under the categories of Area and Stationary sources) of any one pollutant in excess of the Federal Class I Areas major source threshold of 250 tpy. Therefore, operation of the Proposed Project Alternative would not result in significant adverse effects associated with the regional air quality environment.
TABLE 4-2
PROPOSED PROJECT ALTERNATIVE UNMITIGATED OPERATIONAL EMISSIONS

<table>
<thead>
<tr>
<th>Sources</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SOx</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exempt Conformity Emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Area</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Stationary</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total Exempt Emissions</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Non-Exempt Conformity Emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile</td>
<td>2</td>
<td>16</td>
<td>20</td>
<td>0</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Energy</td>
<td>0</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total Non-Exempt Emissions</td>
<td>2</td>
<td>18</td>
<td>21</td>
<td>0</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Total Emissions</td>
<td>3</td>
<td>19</td>
<td>22</td>
<td>0</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>De Minimis Levels¹</td>
<td>25</td>
<td>25</td>
<td>N/A</td>
<td>N/A</td>
<td>70</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Exceed Level? No No N/A N/A No N/A

Notes: N/A = Not Applicable; levels are not applicable due to attainment status (refer to Appendix H, Table 3-8).
¹ Only applies to Non-Exempt Emissions.
Source: CalEEMod, 2016.

However, to further reduce project-related operational criteria pollutants, BMPs are provided in Section 2.2.3. These measures would minimize CAP emissions from operation of the Proposed Project Alternative through the reduction of on-site area emissions, vehicle idling, and mobile emissions.

4.3.3 REDUCED INTENSITY ALTERNATIVE
Construction Emissions
As with the Proposed Project Alternative (refer to Section 4.3.2), construction of the Reduced Intensity Alternative is assumed to occur 8 hours a day, 5 days a week. Construction emission totals for the Reduced Intensity Alternative are shown in Table 4-1. As shown in Table 4-1, emissions of individual criteria pollutants from construction of the Reduced Intensity Alternative would not exceed de minimis levels; therefore, no conformity determination is required and project-related emissions would be less than significant. However, to further reduce project-related construction criteria pollutants and DPM, BMPs are provided in Section 2.2.3.

Operational Vehicle and Area Emissions
Buildout of the Reduced Intensity Alternative would result in the generation of operational emissions similar to the Proposed Project Alternative. Unmitigated operational emission totals for the Reduced Intensity Alternative are shown in Table 4-3 for detailed estimates).

As shown in Table 4-3, emissions of individual criteria pollutants from operation of the Reduced Intensity Alternative would not exceed applicable de minimis levels and emissions of individual criteria pollutants from stationary sources (area, energy, and stationary) would not exceed the Tribal NSR threshold of 2 tpy for ROG and NOx. Therefore, a conformity determination is not required and no Tribal NSR permit would be required. Further, Table 4-3 shows that the Reduced Intensity Alternative would not result in stationary source emissions of any one pollutant in excess of the Federal Class I Areas major source threshold of 250 tpy. Therefore, operation of the Reduced Intensity Alternative would not result in significant adverse effects associated with the regional air quality environment. However, to further reduce project-related operational criteria pollutants, BMPs are provided in Section 2.2.3. These measures would minimize CAP emissions from operation of the Reduced Intensity Alternative through the reduction of on-site area emissions, vehicle idling, and mobile emissions.
### TABLE 4-3
REDUCED INTENSITY UNMITIGATED OPERATIONAL EMISSIONS

<table>
<thead>
<tr>
<th>Sources</th>
<th>Criteria Pollutants</th>
<th>ROG</th>
<th>NO\textsubscript{x}</th>
<th>CO</th>
<th>SO\textsubscript{2}</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>tons per year (tpy)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Exempt Conformity Emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Area</td>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Stationary</td>
<td></td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total Exempt Emissions</td>
<td></td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Non-Exempt Conformity Emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile</td>
<td></td>
<td>2</td>
<td>14</td>
<td>17</td>
<td>0</td>
<td>5</td>
<td>1</td>
</tr>
<tr>
<td>Energy</td>
<td></td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total Non-Exempt Emissions</td>
<td></td>
<td>2</td>
<td>15</td>
<td>18</td>
<td>0</td>
<td>5</td>
<td>1</td>
</tr>
<tr>
<td>Total Emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>De Minimis Levels\textsuperscript{1}</td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>

| Exceed Level? | No | No | N/A | N/A | No | N/A |

Notes: N/A = Not Applicable; levels are not applicable due to attainment status (refer to Appendix H).

\textsuperscript{1} Only applies to Non-Exempt Emissions.

Source: CalEEMod, 2016.

4.3.4 **NON-GAMING ALTERNATIVE**

**Construction Emissions**

Construction of the Non-Gaming Alternative would emit PM\textsubscript{10}, NO\textsubscript{x}, SO\textsubscript{2}, CO, ROG, and HAPs (primarily in the form of DPM) from the operation of construction equipment and grading activities. Construction is assumed to occur 8 hours a day, 5 days a week. Unmitigated construction emission totals for the Non-Gaming Alternative are shown in Table 4-1, and mitigated construction emission totals are shown in parentheses (also see Appendix N for model output files). As shown in Table 4-1, emissions of individual criteria pollutants from construction of the Non-Gaming Alternative would not exceed de minimis levels; therefore, no general conformity determination would be required and project-related emissions would be less than significant. However, to further reduce project-related construction criteria pollutant emissions, BMPs are provided in Section 2.2.3.

**Operational Vehicle and Area Emissions**

The Non-Gaming Alternative proposes less development than the Proposed Project Alternative (refer to Section 4.3.2), consisting of all components of the Proposed Project Alternative with the exception of the casino. However, fewer trips from retail and recreational land uses are internally captured due to the absence of a casino from this alternative, therefore increasing total vehicle miles traveled and emissions from mobile sources. Buildout of the Non-Gaming Alternative would result in the generation of mobile emissions from patron, employee, and delivery vehicles, as well as area and energy criteria pollutant emissions from combustion of natural gas in boilers, stoves, heating units, and other equipment. Unmitigated operational emission totals for the Non-Gaming Alternative are shown in Table 4-4. Detailed estimated emissions are provided in Appendix N.

As shown in Table 4-4, without mitigation, non-exempt emissions of the ozone precursor NO\textsubscript{x} from operation of the Non-Gaming Alternative would exceed applicable levels by approximately 2 tpy. Therefore, this would be a significant adverse impact. BMPs provided in Section 2.2.3 would minimize CAP emissions from operation of the Non-Gaming Alternative through the implementation of measures intended to reduce on-site area emissions, vehicle idling, and mobile emissions. Additionally, mitigation in Section 5.0 requires the purchase of credits to fully offset NO\textsubscript{x} emissions to below de minimis levels. After mitigation, impacts to the regional air quality environment resulting from operation of the Non-Gaming Alternative would be reduced to less-than-significant.
As shown in Table 4-4, emissions of individual criteria pollutants from stationary sources (area, energy, and stationary) would not exceed the Tribal NSR threshold of 2 tpy for ROG and NO\textsubscript{x}; therefore, no Tribal NSR permit would be required. Further, Table 4-4 shows that the Non-Gaming Alternative would not result in stationary source emissions (under the categories of Area and Stationary sources) of any one pollutant in excess of the Federal Class I Areas major source threshold of 250 tpy.

### 4.3.5 No Action Alternative

Under the No Action Alternative, the North Site would not be taken into trust and no development would occur. No construction or operational mobile or stationary criteria pollutants or DPM emissions would be generated under this alternative.

### 4.4 Biological Resources

#### 4.4.1 Proposed Project Alternative

**Sensitive Communities**

No unique or sensitive ecosystems or biological communities occur within the North Site, as discussed in Appendix H. The North Site is comprised of disturbed/developed land formerly utilized for residential uses, and is designated as “urban” in the City General Plan (City of Cathedral City, 2009). Existing development includes several structures, paved parking areas, roadways, and utilities. Vegetation is minimal and consists of ornamental species planted along roadways and sidewalks, including palms and non-managed areas dominated by immature non-native ruderal species. No wildlife was observed on the North Site. The North Site does not contain sensitive or natural communities that could be adversely affected during development associated with the Proposed Project Alternative.  Therefore, the Proposed Project Alternative would result in no effect to sensitive communities.

**Special-Status Species**

For the purposes of this assessment, “special-status” has been defined to include those species that are listed as endangered or threatened under the Federal Endangered Species Act (FESA), formally listed by the state and/or recognized by state agencies, the California Native Plant Society (CNPS), or other local jurisdictions due to rarity, vulnerability to habitat loss, or population decline. If adverse effects to special-status species are determined to potentially occur, this would be considered a significant effect and would require mitigation.
As discussed in Appendix H, the North Site provides potential habitat for one special-status species: the western yellow bat. The western yellow bat is a state species of special concern. Potential roosting habitat on the North Site occurs within palm skirts located on the outer perimeter of the site along roadways and sidewalks. Occurrence potential is low due to highly disturbed surrounding areas and heavy vehicular traffic on the adjacent East Palm Canyon Drive. Additionally, the nearest documented occurrence of this species was observed approximately 5.5 miles from the North Site in 1998 (CDFW, 2018b). Mitigation measures are presented in Section 5.0 to ensure that potential impacts to the western yellow bat are avoided, should this species occur within the North Site. With implementation of mitigation measures, this alternative may affect, but is not likely to adversely affect, special-status wildlife species.

**Migratory Birds and Other Birds of Prey**

Construction of the Proposed Project Alternative has the potential to disturb migratory birds and other birds of prey that may forage or nest on and near the North Site. The nesting season ranges from February 15 through September 15. Trees and vegetation are minimal on the North Site; however, palms occur around the perimeter and near sidewalks. Mitigation measures are presented in Section 5.0 to ensure that potential impacts to migratory birds and other birds of prey are avoided. With implementation of mitigation measures, this alternative may affect, but is not likely to adversely affect, migratory birds and other birds of prey.

**Wetlands and Waters of the U.S.**

The North Site does not contain potentially jurisdictional wetlands or Waters of the U.S. Therefore, the Proposed Project Alternative would result in no effect to wetlands or Waters of the U.S.

### 4.4.2 Reduced Intensity Alternative

Potential impacts of the Reduced Intensity Alternative are similar to those discussed in Section 4.4.1. Therefore, the Reduced Intensity Alternative would result in no effect to sensitive communities or wetlands and Waters of the U.S. Mitigation measures are presented in Section 5.0 to ensure that potential impacts to the western yellow bat, and migratory birds and other birds of prey are avoided. With implementation of mitigation measures, this alternative may affect, but is not likely to adversely affect, special-status wildlife species, and migratory birds and other birds of prey.

### 4.4.3 Non-Gaming Alternative

Potential impacts of the Non-Gaming Alternative are similar to those discussed in Section 4.4.1. Therefore, the Non-Gaming Alternative would result in no effect to sensitive communities or wetlands and Waters of the U.S. Mitigation measures are presented in Section 5.0 to ensure that potential impacts to the western yellow bat, and migratory birds and other birds of prey are avoided. With implementation of mitigation measures, this alternative may affect, but is not likely to adversely affect, special-status wildlife species, and migratory birds and other birds of prey.

### 4.4.4 No Action Alternative

Under the No Action Alternative, the North Site would not be taken into trust, and no development would occur. Therefore, the No Action Alternative would not result in adverse impacts to biological resources.

### 4.5 Cultural Resources

#### 4.5.1 Proposed Project Alternative

As discussed in Appendix H and Appendix J, no historic properties, known archaeological sites or cultural materials are currently located within the Area of Potential Effects (APE) for the North Site under the Proposed Project. The North Site was once the location of a 1920s-1940s residential community; however, those structures have been demolished. No known historic, cultural, religious, or archaeological resources or paleontological resources would be affected by the Proposed Project Alternative, and the degree of disturbance to the site suggests a low probability for buried cultural resources. There is always a possibility, however, that previously unknown archaeological or paleontological resources could be encountered during construction. Any inadvertent discovery of archaeological resources would be subject to Section 106 of the NHPA as amended (36 CFR § 800), NAGPRA...
(25 USC § 3001 et seq.), and the Archaeological Resources Protection Act of 1979 (16 USC § 470aa-mm). BMPs listed in Section 2.2.3 outline procedures for compliance with these applicable regulations in the event of an unanticipated discovery of archaeological materials, human remains or paleontological resources. With adherence to applicable laws and the implementation of BMPs in Section 2.2.3, no adverse effects to previously unknown cultural resources would occur.

4.5.2 REDUCED INTENSITY ALTERNATIVE
As discussed in Section 3.5 of Appendix H, no historic properties, known archaeological sites, cultural materials, or paleontological resources are located within the APE for the North Site under the Reduced Intensity Alternative. There is always a possibility, however, that previously unknown archaeological or paleontological resources could be encountered during construction. Adherence to applicable laws and implementation of BMPs discussed in Section 2.2.3 would reduce potential adverse impacts to cultural resources to a less-than-significant level.

4.5.3 NON-GAMING ALTERNATIVE
As discussed in Section 3.5 of Appendix H, no historic properties, known archaeological sites, cultural materials, or paleontological resources are located within the APE for the North Site under the Non-Gaming Alternative. There is always a possibility, however, that previously unknown archaeological or paleontological resources could be encountered during construction. With adherence to applicable laws and the implementation of BMPs in Section 2.2.3, no adverse effects to previously unknown cultural resources would occur.

4.5.4 NO ACTION ALTERNATIVE
Under the No Action Alternative, the North Site would not be taken into trust and no development would occur in the near-term. No change in land use is proposed, and the site would remain in its current state. No significant cultural or paleontological resource effects would occur as a result of the No Action Alternative. Therefore, no impacts would occur, and no mitigation is required.

4.6 SOCIOECONOMIC RESOURCES/ENVIRONMENTAL JUSTICE
4.6.1 PROPOSED PROJECT ALTERNATIVE
Economy and Employment
As described in the Economic & Community Impact Analysis (Appendix E) study developed by The Innovation Group, the Proposed Project Alternative would result in a variety of benefits to the regional economy, including increases in overall economic output, and employment opportunities. Construction and operation of the Proposed Project Alternative would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in Riverside County.

New one-time employment opportunities would be generated during the construction phase of the project. These include an estimated 474 direct jobs, 62 indirect jobs, and 145 induced jobs, for a total of 680 jobs that would accrue to Riverside County residents. Operation of the Proposed Project Alternative would generate a total of approximately 556 new direct employment positions, with an additional 139 indirect and 113 induced jobs also created as a result of the Proposed Project Alternative. Total labor income is estimated to exceed $27.6 million annually and the total increase in spending (or value of industry production) in Riverside County is expected to be $93.2 million (Appendix E). Employment opportunities generated at the proposed casino would include entry-level, mid-level, and management positions. Average salaries offered are expected to be consistent with those of other tribal gaming facilities and competitive in the local labor market.

The anticipated increase in employment opportunities throughout the City could result in employment and wages for persons previously unemployed, which would increase the ability of the population to obtain health and safety services and would contribute to the alleviation of poverty among lower income households. However, a significant impact to the local unemployment rate would not be anticipated to occur. Nonetheless, overall, the Proposed Project Alternative would result in beneficial impacts to the regional economy. For additional details
regarding the economic impacts anticipated to be generated by the construction and operation of the Proposed Project Alternative, please refer to Appendix E.

**Tax Impacts**
The Proposed Project Alternative would result in a variety of fiscal impacts. The Tribe would not pay corporate income taxes on revenue or property taxes on tribal trust land. However, potential effects on state and federal tax revenues resulting from the operation of the Proposed Project Alternative are expected to be positive as a result of increased local, state, and federal tax revenues resulting from construction and operation of the Proposed Project Alternative. Tax revenues would be generated for federal, state, and local governments from activities including secondary economic activity generated by tribal gaming (i.e., the indirect and induced effects of the economic impact analysis). The taxes on secondary economic activity include corporate profits tax, income tax, sales tax, excise tax, property tax, and personal non-taxes, such as motor vehicle licensing fees, fishing/hunting license fees, other fees, and fines. However, the Proposed Project Alternative’s increase in demand for public services would result in increased costs for local governments to provide these services (refer to Section 4.9 for an analysis of these impacts). The estimated net fiscal impact to the City would be a decrease of $119,885 under the Proposed Project Alternative (Appendix E). As discussed in Section 2.2.3, the Tribe intends to voluntarily pay development impact fees to the City. Based on the size of the proposed development and the fees contained in Chapter 3.17 of the City’s Municipal Code, the anticipated development impact fee for the Proposed Project Alternative would be $18,750. This would reduce the estimated net fiscal impact to the City to $101,135. This is a potentially significant impact. Mitigation measures are provided in Section 5.0 to avoid this potential fiscal impact to the City. As described in Section 1.4.2, Section 11.7 of the Compact requires that if it is determined that law enforcement, fire protection, emergency medical services, and any other public services will be burdened as a result of the Proposed Project despite the mitigation measures identified in this EA and the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code, prior to commencement of the Proposed Project, and no later than the issuance of the Final TEIR to the County, the Tribe will offer to commence negotiations with the City and if necessary, the County. These negotiations would allow for all parties to enter into enforceable intergovernmental agreements with respect to the matters set forth in Section 11.7(a) of the Compact to ensure that the mitigation contemplated herein is sufficient. After mitigation, fiscal impacts would be less-than-significant.

**Housing**
Based on the information presented in Appendix E, the City’s housing market has a 19 percent vacancy rate (U.S. Census Bureau, 2016c). As indirect and induced employment opportunities would be dispersed among a variety of different businesses throughout the region, it is expected that available employees would already be located near these locations and would not require relocation. It is estimated that the increase in employment generated by the Proposed Project Alternative would result in approximately 60 new employees relocating to the City. It is anticipated that sufficient vacant homes would be available to accommodate any potential increase in population resulting from impacts to the regional labor market under the Proposed Project Alternative (Appendix E). Therefore, the Proposed Project Alternative is not expected to stimulate regional housing development. A significant impact to the housing market would not occur. Potential indirect effects resulting from growth inducement are discussed further in Section 4.13.

**Social Effects**

**Pathological and Problem Gambling**
Approximately 86 percent of Americans report having gambled at least once during their lifetimes, with 0.4 to 1.6 percent being classified as pathological gamblers. A three-level metric for types of gambling can be used, which includes recreational gambling (no appreciable harmful effects), problem gambling (urge to gamble despite harmful negative consequences or a desire to stop), and pathological gambling (compulsive gambling; periodic loss of control over gambling; irrational thinking) (Appendix E).

Residents of the City and County have already been exposed to many forms of gambling, including from the existing casinos described in Section 3.0, Appendix H, and Appendix E. Prevention and treatment programs already exist in the vicinity of the site, and are funded by the State. The Proposed Project Alternative would not
substantially increase the prevalence of problem gamblers as several existing gaming facilities are already established within relatively short driving distances from the site, and is therefore not expected to increase costs to the surrounding community of treatment programs for compulsive gambling.

Furthermore, a portion of payments to the State of California pursuant to the Compact would be dedicated to funding problem gambling treatment programs. These payments made by the Tribe would further reduce the already less-than-significant impacts to problem gambling. Therefore, the impact is less than significant and no further mitigation measures are warranted.

**Crime**

There is a general belief that the introduction of legalized gambling into a community increases crime. However, this argument is based more on anecdotal evidence rather than empirical evidence. Whenever large volumes of people are introduced into an area, the volume of crime would also be expected to increase. This is true of any large-scale development. Given the availability of gaming in the region, the addition of gaming in the City is not expected to lead to a material increase in crime rates in the area.

The Proposed Project Alternative would result in an increased number of patrons and employees traveling/commuting into the community on a daily basis. As a result, under the Proposed Project Alternative, criminal incidents may increase in the vicinity of the project, as with any other development of this size. This may result in an increase in the calls for law enforcement service. See Section 4.9 for an analysis of effects to law enforcement services. Mitigation measures are provided in Section 5.0 to avoid potential fiscal impacts to the City that would offset the increased cost of law enforcement services to the Proposed Project Alternative. Therefore, with mitigation, the Proposed Project Alternative would not result in significant adverse effects associated with crime.

**Tribal Casino Gaming Market Substitution Effects**

Appendix E provides a detailed review of competitive gaming facilities based on identification of local and regional gaming facilities. Based on this review, potential substitution effects of the Proposed Project Alternative on other gaming facilities were calculated. Existing regional gaming facilities with the greatest potential to be affected by the Proposed Project Alternative include the two other facilities owned and operated by the Tribe (which would experience a decrease in revenue between 6.2 and 8.5 percent). The Proposed Project Alternative would result in a less than 2.0 percent decrease in revenue at three other nearby casinos (Fantasy Springs Resort Casino, Augustine Casino, and Spotlight 29 Casino), and a less than 1.0 percent decrease at seven casinos located at further distances from the North Site. Anticipated decreases in revenue at existing casinos are not considered to be significant. Therefore, the operation of the Proposed Project Alternative would not cause a significant impact, as it would not affect the ability of the Tribe or any other tribal government to provide essential services and facilities to its membership, or result in the closure of any of the competing gaming facilities.

Further, given the extensive supply of gaming facilities already operating in the area, no substantial substitution effects to local business is projected. It is anticipated that the Proposed Project Alternative would have a beneficial impact to local businesses and local hotels from increased patronage to the area, as the project is designed as an anchor for development in the surrounding area.

**Environmental Justice for Minority and Low Income Populations**

As discussed in Section 3.0 and Appendix E, there are no identified low-income Census tracts in the vicinity of the North Site; however, minority communities, including the Tribe, are located within the Census tract that contains the site as well as in one adjacent Census tract. As described throughout this section of this EA, after mitigation, all environmental impacts of the Proposed Project Alternative would be reduced to a less-than-significant level. Furthermore, the Proposed Project Alternative would not displace any residential populations in the vicinity of the North Site. Effects to minority populations would include positive impacts from the Proposed

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3 The decrease in revenue at the Tribe’s existing casino will be offset by the increase in revenue from the Proposed Project Alternative.
Project Alternative’s beneficial impacts to the local economy (including the creation of permanent jobs). Impacts include an increased revenue base for strengthening the Tribe’s government and tribal services, as discussed further below. Therefore, the Proposed Project Alternative would not result in disproportionately high and adverse environmental effects to minority or low-income communities, including the Tribe.

**Effects to the Agua Caliente Band of Cahuilla Indians**

As discussed in Section 1.3, the Proposed Project Alternative would provide important economic and social benefits to the Tribe by generating the revenues needed to fund government services, including the creation of a tribal court system, development of a robust tax commission, and address homelessness on the Reservation. Further, the Tribe aims to re-establish its historic land base, which requires substantial revenues due to high acquisition costs. Revenue from the Proposed Project Alternative would have a long-term beneficial impact on the Tribe.

### 4.6.2 Reduced Intensity Alternative

The gaming component of the Reduced Intensity Alternative is identical to the Proposed Project Alternative; refer to Section 4.6.1 and Appendix E for socioeconomic impacts related to the Reduced Intensity Alternative gaming facility. However, as a result of the smaller non-gaming component, the Reduced Intensity Alternative would generate fewer employment opportunities, less revenue, less off-site tax revenue, and lower construction costs than that under the Proposed Project Alternative. Socioeconomic effects, such as social effects and effects to the tribal casino gaming market would be reduced proportionally to the size of the development. Therefore, the Reduced Intensity Alternative would still have beneficial socioeconomic effects; however, these effects would be reduced from the Proposed Project Alternative.

The net fiscal impact to the City would be a decrease of $109,383 under the Reduced Intensity Alternative (Appendix E). As discussed in Section 2.2.3, the Tribe intends to voluntarily pay development impact fees to the City. Based on the size of the proposed development and the fees contained in Chapter 3.17 of the City’s Municipal Code, the anticipated development impact fee for the Reduced Intensity Alternative would be $15,450. This would reduce the estimated net fiscal impact to the City to $93,933. This is a potentially significant impact. Mitigation measures are provided in Section 5.0 to avoid this potential fiscal impact to the City. As described in Section 1.4.2, Section 11.7 of the Compact requires that prior to commencement of the Reduced Intensity Alternative, and no later than the issuance of the Final TEIR to the County, if it is determined that law enforcement, fire protection, emergency medical services, and any other public services will be burdened as a result of the Reduced Intensity Alternative despite the mitigation measures identified in this EA and the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code, the Tribe shall offer to commence negotiations with the City and if necessary, the County. These negotiations would allow for all parties to enter into enforceable intergovernmental agreements with respect to the matters set forth in Section 11.7(a) of the Compact. After mitigation, fiscal impacts would be less than significant.

### 4.6.3 Non-Gaming Alternative

The Non-Gaming Alternative does not include a gaming component, but has expanded mixed-use facilities when compared to the Proposed Project Alternative (refer to Section 4.6.1). See Appendix E for specific socioeconomic effects, such as the number of jobs created and economic activity anticipated under the Non-Gaming Alternative. Compared with the gaming facility under the Proposed Project Alternative, the increase in size of the mixed-use facilities would create less economic and employment benefits because the lack of a gaming component would result in fewer new jobs and less economic activity. Certain socioeconomic effects, such as social effects and effects to the tribal casino gaming market would be reduced. The Non-Gaming Alternative would still have beneficial socioeconomic effects; however, these effects would be smaller than those of the Proposed Project Alternative. The Non-Gaming Alternative would result in competitive effects to local retailers. However, such effects would be less than significant due to the existence of spare capacity or “gap” in the local retail market (Appendix E).

The net fiscal impact to the City would be a decrease of $145,480 under the Non-Gaming Alternative (Appendix E). As discussed in Section 2.2.3, the Tribe intends to voluntarily pay development impact fees to the City.
Based on the size of the proposed development and the fees contained in Chapter 3.17 of the City’s Municipal Code, the anticipated development impact fee for the Non-Gaming Alternative would be $13,500. This would reduce the estimated net fiscal impact to the City to $131,980. This is a potentially significant impact. Mitigation measures are provided in Section 5.0 to avoid this potential fiscal impact to the City, including requiring the Tribe to enter into a Municipal Services Agreement with the City, which would require compensation for law enforcement and fire protection services utilized by the Non-Gaming Alternative.

4.6.4 NO ACTION ALTERNATIVE
Under the No Action Alternative, the North Site would not be taken into trust, and no development would occur. Therefore, none of the potential effects identified under the Proposed Project Alternative would occur.

4.7 TRANSPORTATION/CIRCULATION METHODOLOGY
Study Intersections and Roadway Segments
A TIA was conducted by Webb Associates in July 2018 to determine the effects the proposed development would have on study intersections and roadway segments, review the available access to the development, and provide recommendations for improvements that may be necessary to accommodate the traffic expected to be generated by the development. The TIA is provided as Appendix K to this EA.

To assess project-related impacts on the transportation system, opening year background traffic conditions were estimated for the year 2020. As described in Appendix K, the 2020 background traffic conditions were determined by applying an average annual growth rate of 2 percent to the 2018 existing traffic described in Section 3.7 of Appendix H. Table 5-1 of Appendix K shows the study intersections under 2020 baseline conditions.

The study area intersections were analyzed using procedures published in the 2010 Highway Capacity Manual and PTV Vistro 5.00, a computer-based traffic analysis program (Appendix K). Estimated traffic generated by the project was added to the 2020 opening year background traffic to determine whether the project would cause the study intersections or roadways to operate at an unacceptable LOS. For the purposes of this analysis, an overall intersection LOS of D or better is considered acceptable (Appendix K). If an intersection operates at LOS E or F without the addition of the project, a significant impact would occur if the project would add 50 or more trips to the intersection or if the vehicle-to-capacity ratio of a roadway segment exceeds 1.0. These thresholds apply to all study intersections and roadways. For roadways or intersections operating unacceptably without the addition of the project, an increase in the volume to capacity (v/c) ratio of 0.05 or greater as a result of the project would result in a significant impact.

Trip Generation Rates
Trip generation relates land uses to the number of vehicles entering or exiting the site and the directional splits of inbound/outbound traffic. A trip is defined as a vehicle either entering or exiting the site. The trip generation rates were derived for the project based on information published in the Institute of Transportation Engineers (ITE) 10th Edition of Trip Generation Manual (Appendix K). The ITE Manual does not provide a standard trip generation rate for casino land uses; therefore, counts at nearby existing casinos of a similar size were utilized to determine the casino trip generation rate. The ITE standard trip rates were used for the restaurants and shopping center land uses, as described in Appendix K. Due to the close proximity of the casino, restaurant, and retail facilities, and their shared access, there would be internal capture between these land uses and, therefore, a trip reduction was applied to account for this internal capture. Tables 4-1 and 4-2 of Appendix K provide a summary of the trip generation rates used for the proposed casino and mixed use facilities.4

4 Note that the tribal governmental land use was included in the square footage for Building A and analyzed at the mixed-use rate assumed for Building A. This resulted in a conservative estimate of generated trips, as office uses generate fewer trips than mixed-use buildings.
Trip Distribution
Estimated traffic generated by the Proposed Project Alternative was distributed on the surrounding street system based on anticipated site use. Figures 4-A through 4-D of Appendix K show the traffic volumes and distribution for the Proposed Project Alternative.

4.7.1 PROPOSED PROJECT ALTERNATIVE
Study Intersections and Roadway Segments
Trip generation and trip distribution are provided in Table 4-5 below and in Figure 4-A of Appendix K, respectively, for the Proposed Project Alternative. Tables 5-1 and 5-5 of Appendix K provide a summary of the future LOS at each study intersection and roadway segment with the addition of traffic from the Proposed Project Alternative. With the addition of traffic generated by the Proposed Project Alternative, all intersections and roadway segments would operate acceptably, with the exception of:

- Date Palm Drive/Buddy Rogers Avenue (increased from LOS C to LOS E/F);
- Cathedral Canyon Drive/Paseo Real (increased from LOS E to LOS F);
- East Palm Canyon Drive between Cathedral Canyon Drive and Date Palm Drive (LOS F; v/c ratio increase from 1.00 to 1.04); and
- East Palm Canyon Drive between Date Palm Drive and Frank Sinatra Drive (LOS E; v/c ratio increase from 0.82 to 0.85).

<table>
<thead>
<tr>
<th>Land Use</th>
<th>PM Peak Hour</th>
<th>Saturday MD Peak Hour</th>
<th>Daily</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>In</td>
<td>Out</td>
</tr>
<tr>
<td>Casino</td>
<td>289</td>
<td>125</td>
<td>164</td>
</tr>
<tr>
<td>Shopping Center</td>
<td>189</td>
<td>91</td>
<td>98</td>
</tr>
<tr>
<td>Internal Capture – Retail to Restaurant</td>
<td>-82</td>
<td>-50</td>
<td>-32</td>
</tr>
<tr>
<td>Internal Capture – Retail to Casino</td>
<td>-64</td>
<td>-24</td>
<td>-40</td>
</tr>
<tr>
<td>Shopping Center Subtotal</td>
<td>43</td>
<td>17</td>
<td>26</td>
</tr>
<tr>
<td>High-Turnover Sit-Down Restaurant</td>
<td>137</td>
<td>85</td>
<td>52</td>
</tr>
<tr>
<td>Quality Restaurant</td>
<td>109</td>
<td>73</td>
<td>36</td>
</tr>
<tr>
<td>Fast Casual Restaurant</td>
<td>85</td>
<td>47</td>
<td>38</td>
</tr>
<tr>
<td>Coffee/Donut Shop</td>
<td>73</td>
<td>37</td>
<td>36</td>
</tr>
<tr>
<td>Internal Capture – Restaurant to Retail</td>
<td>-97</td>
<td>-36</td>
<td>-61</td>
</tr>
<tr>
<td>Restaurant Subtotal</td>
<td>122</td>
<td>82</td>
<td>40</td>
</tr>
<tr>
<td>Project Total</td>
<td>445</td>
<td>224</td>
<td>230</td>
</tr>
</tbody>
</table>

Source: Appendix K.

However, the segment of East Palm Canyon Drive between Cathedral Canyon Drive and Date Palm Drive would not increase the v/c ratio by 0.05 or greater; therefore, this does not constitute a significant impact. Further, because the segment between Date Palm Drive and Frank Sinatra Drive would not increase above a v/c ratio of 1.0, it is not considered a significant impact. Mitigation provided in Section 5.0 would ensure that impacts to the intersections listed above are reduced to less-than-significant levels.

Transit, Bicycle, and Pedestrian Facilities
As described in Section 3.0 and Appendix K, transit, bicycle, and pedestrian facilities are generally present in the vicinity of the North Site. The project incorporates design features to ensure the site meets the City’s walkability goal for the downtown area (City of Cathedral City, 2012). An increase in transit ridership may be experienced as
a result of the Proposed Project Alternative. Mitigation is included in Section 5.0 to ensure potential impacts are less than significant by contributing to transit development funds.

4.7.2 REDUCED INTENSITY ALTERNATIVE

Study Intersections and Roadway Segments

Trip generation and trip distribution are provided in Table 4-4 and Figure 4-B of Appendix K for the Reduced Intensity Alternative. Tables 5-2 and 5-6 of Appendix K provide a summary of the future LOS at each study intersection and roadway segment with the addition of traffic from the Reduced Intensity Alternative. The same intersections and roadway segments would operate unacceptably under the Reduced Intensity Alternative and the Proposed Project Alternative; refer to Section 4.7.1 and mitigation provided in Section 5.0. Therefore, the Reduced Intensity Alternative would not result in a significant impact to LOS.

Transit, Bicycle, and Pedestrian Facilities

Similar to the Proposed Project Alternative, the Reduced Intensity Alternative would have no adverse impacts on local transit systems or bicycle and pedestrian facilities after mitigation provided in Section 5.0.

4.7.3 NON-GAMING ALTERNATIVE

Study Intersections and Roadway Segments

Trip generation and trip distribution are provided in Table 4-5 and Figure 4-C of Appendix K for the Non-Gaming Alternative. Tables 5-3 and 5-7 of Appendix K provide a summary of the future LOS at each study intersection and roadway segment with the addition of traffic from the Non-Gaming Alternative. The same intersections and roadway segments would operate unacceptably under the Non-Gaming Alternative and the Proposed Project Alternative; refer to Section 4.7.1 and mitigation provided in Section 5.0. Therefore, the Non-Gaming Alternative would not result in a significant impact to LOS.

Transit, Bicycle, and Pedestrian Facilities

Similar to the Proposed Project Alternative, the Non-Gaming Alternative would have no adverse impacts on local transit systems or bicycle and pedestrian facilities after mitigation provided in Section 5.0.

4.7.4 NO ACTION ALTERNATIVE

Under the No Action Alternative, the North Site would not be taken into trust and no development would occur in the near term. No change in land use is proposed, and the site would remain in its current state. The traffic conditions under the No Action Alternative would continue as described in Section 3.0 and Appendix K for the baseline without project conditions, and no traffic would be added to local intersections. Therefore, no significant traffic effects would occur, and no mitigation is required.

4.8 LAND USE

4.8.1 PROPOSED PROJECT ALTERNATIVE

As described in Section 2.1, the Proposed Project Alternative includes the transfer of the approximately 13.6-acre North Site from fee to trust status, and the subsequent development of a casino, restaurants, retail, and ancillary infrastructure, including parking lots. Once the federal government acquires the North Site in trust for the Tribe, the parcels would no longer be subject to City land use regulations but would be under the civil regulatory jurisdiction of the Tribe and the federal government.

Land Use Plans

City planning documents currently in effect for the North Site include the City General Plan, Date Palm Drive Specific Plan, and City Zoning Ordinance. The proposed land uses within the site would be compatible with the Land Use Map provided in the City General Plan, which identifies the entirety of the North Site as DTC, which is a land use designation that specifically allows for commercial and entertainment uses. The North Site is zoned as MXC and DRN. The Proposed Project Alternative would develop the land with entertainment and commercial mixed uses, which would be compatible with the City’s MXC designation, but not with the DRN designation;
however, when multiple parcels are developed together with mixed MXC or DRN zoning, the provisions of either
zone can apply to the entire development (City Municipal Code § 9.31.040). Additionally, the Proposed Project
Alternative would be consistent with the City’s plan for its downtown area as described by the Downtown/Art and
Design Village designation within the Date Palm Drive Specific Plan, which specifies the North Site for the
development of a major retail anchor. It should also be noted that Cathedral City Council Resolution 2017-14,
which is included as Exhibit H to the Fee-to-Trust Application, supports the Tribe’s use of the North Site for
gaming purposes. Overall, development of the Proposed Project Alternative is consistent with the existing and
planned uses of the North Site. Therefore, the Proposed Project Alternative would result in less-than-significant
impacts associated with conflicts with local land use plans.

**Land Use Compatibility**

The areas immediately adjacent to the North Site are either empty lots that were previously developed, contain
commercial uses, or are a public park. The North Site and the surrounding areas are planned for DTC
development by the City, which the Proposed Project Alternative would be compatible with. The proposed
development would not physically disrupt neighboring land uses, prohibit access to neighboring parcels, or
otherwise significantly conflict with neighboring land uses. The fire station currently located at the northeastern
corner of the North Site would be relocated across Buddy Rogers Avenue to the adjacent parcel that is part of the
existing public park; however, this is not a part of the project and would occur regardless of the implementation of
the Proposed Project Alternative. While the proposed uses within the site are generally compatible with the
commercial nature of the area and adjacent restaurant and shopping centers, the increase in intensity of
development within the site as a result of the Proposed Project Alternative could result in conflicts with nearby
sensitive land uses (including the apartment complex 440 feet to the northwest, Second Street Park 25 feet to the
north, and single family residential neighborhood approximately 500 feet to the southwest); potential conflicts
may include air quality and noise impacts from construction activities and the increase in traffic (Sections 4.3 and
4.11, respectively), and an increase in lighting (Section 4.10). Implementation of protective measures and BMPs
identified in Section 2.2.3 and mitigation measures identified in Section 5.0 would reduce potential adverse
impacts to less-than-significant levels. Therefore, the Proposed Project Alternative would result in less-than-
significant impacts associated with land use compatibility.

**4.8.2 REDUCED INTENSITY ALTERNATIVE**

The Reduced Intensity Alternative would result in the development of four fewer structures than the Proposed
Project Alternative on the North Site (refer to Section 4.8.1). The land use compatibility of the Reduced Intensity
Alternative would be similar to the Proposed Project Alternative, with regards to the City’s land use and zoning
designations. Refer to Sections 2.2.3, 4.3, 4.8.1, 4.11, 4.10, and 5.0 for related impacts, BMPs, and mitigation
measures. Therefore, the Reduced Intensity Alternative would result in less-than-significant impacts associated
with land use conflicts.

**4.8.3 NON-GAMING ALTERNATIVE**

The Non-Gaming Alternative would result in a similarly-sized development on the North Site, with no casino
proposed, as compared with the Proposed Project Alternative (refer to Section 4.8.1). The land use compatibility of
the Non-Gaming Alternative would be similar to the Proposed Project Alternative, with regards to the City’s land
use and zoning designations; refer to Sections 2.2.3, 4.3, 4.8.1, 4.11, 4.10, and 5.0 for related impacts, BMPs, and
mitigation measures. Therefore, the Non-Gaming Alternative would result in less-than-significant impacts
associated with land use conflicts.

**4.8.4 NO ACTION ALTERNATIVE**

Under the No Action Alternative, the North Site would not be taken into trust and would remain in its current
condition. No project-related development would take place on any part of the site in the near term, although it is
possible the land would be eventually developed in accordance with the City General Plan. No land use conflicts
would occur under the No Action Alternative. Therefore, the No Action Alternative would not result in adverse
impacts related to land use.
4.9 PUBLIC SERVICES AND UTILITIES

4.9.1 PROPOSED PROJECT ALTERNATIVE

Water Supply
The estimated average daily water usage for the Proposed Project Alternative would be approximately 33,929 gpd, or approximately 38 AFY (Appendix F). Water to serve the casino development would be supplied by DWA. As described in Section 2.2.2, while DWA water mains exist on and adjacent to the North Site, these mains are inadequate to serve the Proposed Project Alternative. Therefore, the Proposed Project Alternative includes the placement of a 12-inch water main along the southern boundary of the North Site within East Palm Canyon Drive from an existing water main at the intersection of East Palm Canyon Drive and Date Palm Drive, and would then run north through the project site along Allen Drive, terminating at the existing water main running east-to-west in Buddy Rogers Avenue (refer to Figure 4.9-1 of Appendix D). As described in Appendix F, this new main would provide sufficient fire flows to meet the Proposed Project Alternative demands. The Proposed Project Alternative would also involve the removal or abandonment of the existing water mains on the North Site to accommodate construction of the project. These improvements would occur on or immediately adjacent to the North Site. Refer to Section 4.13.4 regarding the potential impacts of the off-site water infrastructure improvements.

The total water demand experienced by DWA in 2017 (the most recent year for which actual use data are available) was approximately 34,689 AFY (DWA, 2018d); demand is anticipated to increase to 42,708 AFY by 2020 (DWA, 2016). Therefore, the estimated annual water demand of the Proposed Project Alternative represents only 0.1 percent of DWA’s actual total demand in 2015 and less than 0.1 percent of DWA’s projected total demand in 2020. Additionally, as described in Appendix F, the DWA water supply infrastructure in the vicinity of the North Site was constructed based on an assumption that future development on the site would demand significantly more water (a total of approximately 76,320 gpd) than is projected under the Proposed Project Alternative. Therefore, with the exception of the water main improvements described above, DWA has an adequate water supply and regional supply infrastructure to serve the Proposed Project Alternative and impacts on water service providers would be less than significant.

Wastewater Service
Under the Proposed Project Alternative, wastewater generated by the project would be collected by DWA sewer lines and treated at CVWD facilities. As described in Section 2.2.2, there are existing DWA sewer mains and branch lines on and in the immediate vicinity of the North Site. However, because these existing sewer mains and branch lines would be inadequate and improperly positioned to serve the Proposed Project Alternative, the project involves the construction of a new 8-inch sewer main along the northern site boundary within Buddy Rogers Avenue and then south through the project site along Allen Avenue to the point where Allen Avenue currently intersects with Grove Street (refer to Figure 4.9-1 of Appendix D). As with the existing water mains, the existing sewer mains on the North Site would need to be removed or abandoned to accommodate construction of the Proposed Project Alternative. These improvements would occur on or immediately adjacent to the North Site, and no improvements to other downline components of the DWA or CVWD conveyance and treatment infrastructure would be required. Refer to Section 4.13.4 regarding the potential impacts of the off-site wastewater infrastructure improvements.

The Proposed Project Alternative would generate average daily wastewater flows of approximately 17,892 gpd (Appendix F). As described in Section 3.0 and Appendix H, WRP-10 currently has a significant excess capacity of approximately 17 MGD, which would be more than sufficient to accommodate the flows generated by the Proposed Project Alternative. Furthermore, as described in Appendix F, the regional DWA wastewater conveyance infrastructure was constructed under the assumption that significantly more wastewater flows would be generated by future development on the North Site (a total of approximately 40,068 gpd) than would occur.

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5 The casino water demand rate was based on the supermarket water demand rate established by the AWWA Research Foundation, because no standardized casino water demand rates exist. This rate is considered to be conservative, as it is greater than the water demand rates used for other similar facilities owned and operated by the Tribe, including the rates used in the 2017 Master Plan Draft Tribal Environmental Impact Report for the Tribe’s Spa Resort Casino expansion project.
under the Proposed Project Alternative. Therefore, with the on-site improvements to the wastewater conveyance infrastructure, operational impacts to wastewater treatment service providers would be less than significant, and no mitigation or additional off-site improvements are required.

**Solid Waste Service**
Construction of the Proposed Project Alternative would result in a temporary increase in waste generation. The waste stream would consist of excess construction materials. Waste that cannot be recycled would be disposed of at the Lamb Canyon Landfill. Therefore, the minimal adverse effects on solid waste services during construction would be considered less than significant.

As shown in Table 4-6, based on similar facilities, the operation of the Proposed Project Alternative would generate an estimated 1.03 tons of solid waste per day, or 375.95 tpy. Under the Proposed Project Alternative, the Tribe would contract with Burrrtec to provide solid waste collection, transfer, and recycling services for solid waste generated at the Proposed Project Alternative. The daily amount of solid waste generated by the Proposed Project Alternative is equivalent to approximately 0.02 percent of Lamb Canyon Landfill’s permitted daily disposal capacity of 5,000 tons per day, which is a negligible increase to the solid waste stream that the facility could easily accommodate. Fees paid to Burrrtec pursuant to the contract would compensate for expansion of services to the North Site. Therefore, the impacts to solid waste services would be less than significant.

<table>
<thead>
<tr>
<th>Waste Generation Source</th>
<th>Waste Generation Rate</th>
<th>Units</th>
<th>Value</th>
<th>Total Waste (lb/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Casino (other services)</td>
<td>3.12</td>
<td>lb/100 sf/day</td>
<td>57,500 sf</td>
<td>1,794.00</td>
</tr>
<tr>
<td>Restaurant</td>
<td>0.005</td>
<td>lb/sf/day</td>
<td>41,000 sf</td>
<td>205.00</td>
</tr>
<tr>
<td>Retail</td>
<td>2.5</td>
<td>lb/1,000 sf/day</td>
<td>26,500 sf</td>
<td>66.25</td>
</tr>
<tr>
<td>Total lb/day</td>
<td></td>
<td></td>
<td></td>
<td>2,065.25</td>
</tr>
<tr>
<td>Total ton/day</td>
<td></td>
<td></td>
<td></td>
<td>1.03</td>
</tr>
<tr>
<td>Total ton/year</td>
<td></td>
<td></td>
<td></td>
<td>375.95</td>
</tr>
</tbody>
</table>

Note:
1 – To be conservative, back of house square footage is included.
2 – Assumes 60% of the mixed-use development is restaurants.
3 – Assumes 40% of the mixed-use development is retail.
Source: CalRecycle, 2016.

**Recreation**
Because the Proposed Project Alternative would not result in a substantial increase in population or housing, as discussed in Section 4.6.1, demand for additional recreation facilities would not increase substantially under the Proposed Project Alternative. While the Proposed Project Alternative would be located in close proximity to the existing Second Street Park and Cathedral City Dog Park, the construction and operation of the Proposed Project Alternative would not impede access to these facilities. Therefore, the minimal impacts to recreational facilities would be less than significant.

**Electricity and Natural Gas**
Under the Proposed Project Alternative, electricity would be obtained from SCE. The Proposed Project Alternative would have an estimated electrical load of approximately 7.33 megavolt-amperes (MVA; MSA Engineering Consultants, 2018). The most recent transmission plan prepared by the California Independent System Operator (ISO) Corporation did not identify a need for any transmission upgrades to satisfy projected electricity demand in the SCE service region that includes the North Site (California ISO, 2017). Additionally, SCE’s ongoing West of Devers Upgrade Project, which is projected to be completed in 2021, would further improve the reliability of the electricity supply in the Palm Springs area (SCE, 2017c). Thus, it is not anticipated that implementation of the Proposed Project Alternative alone would require upgrades to SCE’s transmission infrastructure. Payment for electrical service and for any distribution infrastructure upgrades or renovations necessary to provide service to the North Site would be negotiated through an agreement with SCE. Therefore, no significant impacts would occur.
Natural gas service would be obtained from SoCalGas under the Proposed Project Alternative. The Proposed Project Alternative would have an estimated natural gas load of approximately 21,800 CFH (MSA Engineering Consultants, 2018). SoCalGas currently has extensive distribution infrastructure in the immediate vicinity of the North Site, and under the Proposed Project Alternative, natural gas services would continue to be provided to the North Site by SoCalGas. Any improvements to or reorientations of natural gas supply infrastructure required by the development of the Proposed Project Alternative would abide by all California Environmental Quality Act (CEQA) regulations and other applicable federal, State, and local laws. Therefore, the Proposed Project Alternative would not result in significant adverse effects to natural gas services or the physical environment.

**Law Enforcement**

An analysis of the impact of casino gambling on local crime rates is included in Section 4.6. As described in Section 2.2.2, the CCPD would provide law enforcement services to the Proposed Project Alternative. Tribe-managed security cameras and security personnel would provide surveillance of the Proposed Project Alternative structures, parking areas, and ancillary facilities. Security guards would patrol the facilities to reduce and prevent criminal and civil incidents. Security guards would carry two-way radios to request and respond to back up or emergency calls. Because CCPD currently provides law enforcement services to the North Site, it is not anticipated that CCPD would require additional facilities to continue to provide services subsequent to the development of the Proposed Project Alternative. However, operation of the Proposed Project Alternative has the potential to increase the number of calls for service placed to CCPD. As discussed in the Economic and Community Impact Analysis prepared for the Proposed Project Alternative (Appendix E), the Casino is projected to generate approximately 164 to 269 annual calls for law enforcement services beginning in 2021 (its first year of operation), between a 0.3 and 0.5 percent increase over CCPD’s most recent (2017) annual call volume. This would constitute a potentially significant impact. The BMPs described in Section 2.2.3 and the mitigation measures described in Section 5.0, which include the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code and the possible implementation of an intergovernmental agreement, respectively, would reduce potential impacts to law enforcement services to less than significant.

**Fire Protection and Emergency Medical Services**

Equipment and vehicles used during construction activities may create sparks, which could ignite vegetation on the North Site. The use of power tools and acetylene torches may also increase the risk of fire during construction. BMPs listed in Section 2.2.3 would ensure that construction of the Proposed Project Alternative would not create a substantial fire hazard.

Structural fire protection would be provided through voluntary compliance with IFC requirements as adopted under the Tribal Building and Safety Code for commercial structures, including requirements for fire flow as described in Section 2.2.2, sprinkler systems, and fire extinguishers. CCFD would provide both fire protection and emergency medical services to the Proposed Project Alternative. As discussed in the Economic and Community Impact Analysis prepared for the Proposed Project Alternative (Appendix E), the casino is projected to generate approximately 17 annual calls for fire protection services beginning in 2021 (its first year of operation), an approximately 0.3 percent increase over CCFD’s most recent (2017) annual call volume. While the minimal increase in demand for fire protection and emergency medical services is not anticipated to trigger the need to construct new facilities, this would nonetheless constitute a potentially significant impact. The BMPs described in Section 2.2.3 and the mitigation measures described in Section 5.0, which include the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code and the possible implementation of an intergovernmental agreement, respectively, would ensure impacts to fire protection and emergency medical services remain less than significant.

4.9.2 **REDUCED INTENSITY ALTERNATIVE**

The Reduced Intensity Alternative involves the construction and operation of similar project components as the Proposed Project Alternative (refer to Section 4.9.1), but the components would be approximately 18 percent smaller than under the Proposed Project Alternative. Service providers for the Reduced Intensity Alternative would be the same as those under the Proposed Project Alternative and similar water and wastewater line improvements would also be required. Refer to Figure 4.9-2 of Appendix D regarding the location of water and
wastewater infrastructure improvements under the Reduced Intensity Alternative. As the Reduced Intensity Alternative would have reduced demand for services due to the smaller scale of development, impacts would be similar to those described under Section 4.9.1 for water supply, wastewater supply, solid waste service, recreation, electricity and natural gas providers, law enforcement, and fire protection and emergency medical services, though to a lesser extent. With incorporation of the BMPs provided in Section 2.2.3 and mitigation provided in Section 5.0, public services impacts under the Reduced Intensity Alternative would be less than significant.

4.9.3 NON-GAMING ALTERNATIVE
The Non-Gaming Alternative involves the construction and operation of similar project components as the Proposed Project Alternative (refer to Section 4.9.1), but the components would be approximately 28 percent smaller than under the Proposed Project Alternative. Service providers for the Non-Gaming Alternative would be the same as those under the Proposed Project Alternative and similar water and wastewater line improvements would also be required. Refer to Figure 4.9-3 of Appendix D regarding the location of water and wastewater infrastructure improvements under the Non-Gaming Alternative. As the Non-Gaming Alternative would have reduced demand for services due to the smaller scale of development, impacts would be similar to those described under Section 4.9.1 for water supply, wastewater supply, solid waste service, recreation, electricity and natural gas providers, law enforcement, and fire protection and emergency medical services, though to a lesser extent. With incorporation of the BMPs provided in Section 2.2.3 and mitigation provided in Section 5.0, public services impacts under the Non-Gaming Alternative would be less than significant.

4.9.4 NO ACTION ALTERNATIVE
Under the No Action Alternative, the North Site would not be taken into trust, and no development would occur. No additional public services would be extended to the site. Therefore, no increase in demand for any public services would occur under the No Action Alternative.

4.10 VISUAL RESOURCES
4.10.1 PROPOSED PROJECT ALTERNATIVE
Aesthetics
Implementation of the Proposed Project Alternative would result in development of a casino and multi-use buildings on the North Site, which would constitute a change to the existing visual setting. An architectural rendering of the Proposed Project Alternative is provided as Figure 4.10-1 of Appendix D. In general, views of undeveloped, gravel lots and abandoned utilities infrastructure would change to views of more modern commercial development. The tallest proposed building height for the casino would be 60 feet and the tallest multi-use building height would be 36 feet. This is consistent with the heights of nearby commercial development, and would not substantially block scenic views of the mountains surrounding the valley. While the buildings would be highly visible to travelers on Date Palm Drive and East Palm Canyon Drive, the development would not be highly visible from roadways not adjacent to the North Site.

The nearest residential development to the North Site is an apartment building located approximately 400 feet northwest of the site. However, the closest proposed building is more than 700 feet from this residential development, and the intervening land within the North Site will include landscaping and trees surrounding and within the parking area in the western portion of the site (refer to Figure 2-3 of Appendix D). The proposed development would not block views of scenic resources in the vicinity of the North Site. Therefore, the Proposed Project Alternative would not result in significant adverse impacts associated with visual resources.

Lighting
The Proposed Project Alternative would introduce new sources of light to the North Site, for aesthetic and security purposes at the facility and throughout the parking lots, similar to the sources of light from nearby commercial developments. This lighting associated with the Proposed Project Alternative would constitute an increase over the existing ambient light levels on the North Site; however, lighting would be consistent with the
designated commercial use of the North Site. Even so, BMPs included in Section 2.2.3, including shielded and filtered lighting, ensure no significant adverse impacts associated with lighting would occur.

4.10.2 REDUCED INTENSITY ALTERNATIVE
The Reduced Intensity Alternative would develop fewer buildings than the Proposed Project Alternative (refer to Figure 2-4 of Appendix D); therefore, visual impacts related to development under the Reduced Intensity Alternative would be similar to those described above for the Proposed Project Alternative, but would be diminished in scope due to the smaller size of the proposed facilities. An architectural rendering of the Reduced Intensity Alternative is identical to the rendering of the Proposed Project Alternative provided as Figure 4.10-1 of Appendix D. Therefore, the Reduced Intensity Alternative would not result in significant adverse impacts associated with visual resources, and BMPs included in Section 2.2.3 would also apply to the Reduced Intensity Alternative.

4.10.3 NON-GAMING ALTERNATIVE
The Non-Gaming Alternative would result in a similar intensity of development as the Proposed Project Alternative (refer to Figure 2-5 of Appendix D); therefore, visual impacts related to development under the Non-Gaming Alternative would be similar to those described above for the Proposed Project Alternative. Refer to Section 4.10.1. An architectural rendering of the Non-Gaming Alternative is provided as Figure 4.10-2 of Appendix D. The tallest proposed building height would be 36 feet. This is consistent with the heights of nearby commercial development, and would not substantially block scenic views of the mountains surrounding the valley. Therefore, the Non-Gaming Alternative would not result in significant adverse impacts associated with visual resources, and BMPs included in Section 2.2.3 would also apply to the Non-Gaming Alternative.

4.10.4 NO ACTION ALTERNATIVE
Under the No Action Alternative, the North Site would not be taken into trust, and no development would occur. The site would remain in its current state. Therefore, the No Action Alternative would have no impact related to visual resources.

4.11 NOISE ASSESSMENT CRITERIA AND METHODOLOGY
The assessment of project effects is based on the Federal Highway Administration (FHWA) construction noise level thresholds in its 2006 Construction Noise Handbook, City General Plan, and Federal Interagency Committee on Noise (FICON) noise guidance. The assessment of vibration noise is based on the Federal Transportation Administration (FTA) standards. Adverse noise-related effects would occur during construction and operation if the following occurs:

- Project construction results in an increase in the ambient noise environment of greater than 78 dBA, equivalent noise level (Leq), or a 5-dBA increase in the ambient noise level above the existing noise level for daytime residential receptors, or an increase of greater than 83 dBA Leq or a 5-dBA increase for daytime commercial receptors (FHWA, 2006).
- Project operation causes ambient noise levels to exceed noise standards adopted by the City, including 55 dBA CNEL for residential receptors, and 62.5 dBA CNEL for public parks and commercial development (City of Cathedral City, 2009).
- If the ambient noise level exceed City standards under existing conditions, increases in the ambient noise level will be analyzed based on FICON guidance, where an increase of +5 dB is significant for ambient levels less than 60 dB, an increase of +3 dB is significant for ambient levels between 60 and 65 dB, and an increase of +1.5 dB is significant for ambient levels greater than 65 dB (FICON, 1992).
- Construction or operation of the project exceeds the FTA vibration standards of 90 vibration decibels (VdB) for structures and 70 VdB for annoyance of people (FTA, 2006).
4.11.1 PROPOSED PROJECT ALTERNATIVE

Noise-sensitive receptors are land uses associated with indoor and outdoor activities that may be subject to stress or significant interference from noise, including educational, health care, and residential areas. The nearest noise-sensitive receptors to the North Site are a public park located 25 feet north, a residential apartment complex located approximately 440 feet northwest, and commercial buildings located adjacent to the western boundary.

Construction Noise

Construction noise at the North Site would result from construction equipment and activities and vehicle traffic, which consists of trucks hauling materials and workers entering and exiting the North Site. Construction would result in temporary periods of elevated noise levels, typically generating maximum noise levels up to 85 dBA at a distance of 50 feet, as indicated in Table 4-7. These noise levels may vary depending on the particular type, number, and duration of use of various pieces of construction equipment.

<table>
<thead>
<tr>
<th>Construction Equipment</th>
<th>Maximum Noise Level at 50 feet (dBA)</th>
<th>Construction Equipment</th>
<th>Maximum Noise Level at 50 feet (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crane (mobile or stationary)</td>
<td>85</td>
<td>Tractor</td>
<td>84</td>
</tr>
<tr>
<td>Dozer</td>
<td>85</td>
<td>Generator (more than 25 kVA)</td>
<td>82</td>
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<tr>
<td>Excavator</td>
<td>85</td>
<td>Backhoe</td>
<td>80</td>
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<tr>
<td>Grader</td>
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<td>Compressor (air)</td>
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</tr>
<tr>
<td>Paver</td>
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<td>Front end loader</td>
<td>80</td>
</tr>
<tr>
<td>Scraper</td>
<td>85</td>
<td>Pickup truck</td>
<td>55</td>
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</tbody>
</table>


During construction, a maximum of approximately 303 worker and vendor truck trips would occur per day. Material haul trips have the potential to raise ambient noise levels along haul routes, depending on the number of haul trips made and the types of vehicles used. It is estimated that 384 material hauling trips would occur each day during construction. Because trucks are louder than passenger cars, a passenger car equivalence (PCE) multiplier of 10 cars per truck was used to assume 3,840 PCE material hauling trips per day. With the addition of worker vehicle trips, the total trips added to area roadways would be 4,143 vehicle trips. The majority of these trips would occur outside the traffic peak hours, when traffic noise would be greatest. The existing traffic volumes on Date Palm Drive (19,500 average daily traffic [ADT]) and East Palm Canyon Drive (39,900 ADT) are greater than the 4,143 ADT added by the Proposed Project Alternative construction; therefore, as construction trips would less than double traffic on nearby roadways, the increase in ambient noise levels would be less than 1.0 dBA. Therefore, construction traffic would not result in a significant increase in the existing ambient noise level.

Noise from stationary point sources attenuates (lessens) at a rate of 6 to 9 dBA per doubling of distance from the source, depending on environmental conditions (e.g., atmospheric conditions, noise barriers). An attenuation factor of 6.0 dBA per doubling of distance is appropriate for the North Site given the relatively flat topography and lack of ground cover on the site. Based on the estimates of construction noise described above, the maximum construction noise level at the North Site would be 85 dBA at 50 feet. Using an attenuation factor of 6.0 dBA, the noise level at the nearest sensitive noise receptor located approximately 440 feet from the North Site, would be less than 67 dBA. This noise level would be below the federal noise construction threshold of 78 dBA for residences. The noise level at the nearest commercial receptor located adjacent to the western boundary of the North Site would be 85 dBA, which would be above the federal noise construction threshold of 83 dBA for commercial facilities. Mitigation provided in Section 5.0 would require the erection of a temporary sound barrier during construction to reduce noise levels at this commercial receptor. Additionally, the majority of construction will occur at least 100 feet from the western boundary of the site; therefore, temporary construction noise would not have a significant effect on nearby commercial buildings.
Construction noise BMPs identified in Section 2.2.3 would further reduce noise during construction activities and would limit construction to daytime hours to reduce the potential for sleep disturbance, which is consistent with the City’s Noise Ordinance as codified in Municipal Code Chapter 11.96. Therefore, because of the distance of sensitive noise receptors to North Site, short-term and temporary nature of construction noise, and implementation of mitigation and BMPs to reduce construction noise levels to the extent feasible, there would not be a significant adverse impact due to construction noise.

**Construction Vibration**
The vibration levels of typical construction equipment at a distance of 25 feet from the equipment are shown in Table 4-8. As shown in Table 4-8, with the exception of vibratory rollers, vibrations associated with construction equipment are below the thresholds for structural damage (90 VdB) at a distance of 25 feet; however, vibration levels associated with all the equipment in Table 4-8 are above the threshold for annoyance of humans at a distance of 25 feet. The nearest building is approximately adjacent to the western boundary of the North Site. At this distance, the vibration amplitude of a vibratory roller would be greater than 90 VdB, which exceeds the threshold for structural damage (90.0 VdB). Mitigation provided in Section 5.0 would restrict the use of vibratory equipment in the vicinity of this commercial building, which would reduce this impact to a less-than-significant level. The nearest residential receptor to on-site construction is located approximately 440 feet from the North Site. Construction vibration from a vibratory roller at this receptor would be approximately 56.6 VdB, which is lower than the thresholds for structural damage (90.0 VdB) and the annoyance of people (70.0 VdB). Therefore, vibration associated with on-site construction under the Proposed Project Alternative would not have a significant adverse impact on neighboring receptors.

**Operational Noise**
The Proposed Project Alternative would result in an increase of on-site operational noise, primarily resulting from traffic and parking-related activities in parking lots; use of fans for HVAC; and truck loading and unloading.

**Traffic Noise**
The level of traffic noise depends on three things: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of the traffic. It is not anticipated that traffic speed or the mix of trucks in project-area traffic would change during the operational phase; however, implementation of the Proposed Project Alternative would increase traffic volumes. As discussed in Section 3.0 and Appendix H, the primary source of noise in the project area is traffic on East Palm Canyon Drive and Date Palm Drive. The estimated ambient noise level along these roadways in the vicinity of the North Site is approximately 67.2 dBA Leq (Appendix L).

**Date Palm Drive**
Date Palm Drive experiences approximately 19,500 ADT adjacent to the North Site (City of Cathedral City, 2009). Operation of the Proposed Project Alternative would add approximately 2,102 ADT to the existing traffic volume on this roadway (Appendix K). The ambient noise level along Date Palm Drive is 62.8 dBA Leq (Appendix L), which exceeds the City’s ambient noise level standards for residential uses, parks, and commercial receptors. The increase in traffic from operation of the Proposed Project Alternative would result in a 0.44 dBA Leq ambient noise level increase, which is below the FICON threshold for ambient noise increases. Therefore, the Proposed Project Alternative would not result in significant adverse effects associated with traffic noise levels for sensitive noise receptors located along Date Palm Drive.

<table>
<thead>
<tr>
<th>Vibration Source</th>
<th>Approximate Lv (VdB) at 25 ft</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vibratory Roller</td>
<td>94</td>
</tr>
<tr>
<td>Large Bulldozers</td>
<td>87</td>
</tr>
<tr>
<td>Loaded Trucks</td>
<td>86</td>
</tr>
<tr>
<td>Jackhammer</td>
<td>79</td>
</tr>
</tbody>
</table>

**East Palm Canyon Drive**

East Palm Canyon Drive experiences approximately 39,900 ADT adjacent to the North Site (City of Cathedral City, 2009). Operation of the Proposed Project Alternative would add approximately 2,872 ADT to the existing traffic volume on this roadway (Appendix K). The ambient noise level along East Palm Canyon Drive is 67.2 dBA Leq (Appendix L), which exceeds the City’s ambient noise level standards for residential uses, parks, and commercial receptors. The increase in traffic from operation of the Proposed Project Alternative would result in a 0.30 dBA Leq ambient noise level increase, which is below the FICON threshold for ambient noise increases. Therefore, the Proposed Project Alternative would not result in significant adverse effects associated with traffic noise levels for sensitive noise receptors located along East Palm Canyon Drive.

**Buddy Rogers Avenue**

Buddy Rogers Avenue experiences approximately 66 PM peak hour trips adjacent to the North Site (Appendix K). Operation of the Proposed Project Alternative would add approximately 99 PM peak hour trips to the existing traffic volume on this roadway (Appendix K). The ambient noise level along Buddy Rogers Avenue is 63.4 dBA Leq (Appendix L), which exceeds the City’s ambient noise level standards for parks. The increase in traffic from operation of the Proposed Project Alternative would result in a 4 dBA Leq ambient noise level increase, which is above the FICON threshold for ambient noise increases. Therefore, the Proposed Project Alternative would result in significant adverse effects associated with traffic noise levels at Second Street Park and the Cathedral City Dog Park located along Buddy Rogers Avenue. Mitigation provided in Section 5.0 would reduce the ambient noise levels at these parks to below the existing ambient noise level measurements; therefore, impacts would be less than significant.

**Other Roadways**

The increase in traffic along other study area roadways and intersections would be no greater than 20 percent of the total project trip generation. The anticipated increases in traffic along these roadways would not double traffic volumes along these roadways and would not increase ambient noise levels by more than 3 dBA. Therefore, noise impacts along other roadways would be less than significant and no mitigation would be required.

**Operational Vibration and Other Noise Sources**

Noise due to traffic in parking lots is limited by low speeds and, as a result, is not expected to represent a significant source of noise. Human activity in parking lots can also produce noise, including talking, yelling, and opening and closing of car doors and trunk lids. Such activities can occur any time, but frequently occur in the daytime and evening. The noise level in parking lots is generally dominated by slow-moving vehicles; thus, the ambient noise level in parking structures and parking lots is approximately 60.0 dBA (Illingworth & Rodkin, Inc., 2014), which is lower than the existing ambient noise level of 63.4 dBA.

Buildings would be equipped with HVAC units that would most likely be mounted on the roof. The HVAC equipment would have noise shielding and other industry-standard noise abatement measures installed. The noise levels produced by HVAC systems vary substantially with the capacities of the units, as well as with individual unit design, but generally result in a noise level of 60.0 dBA Leq at a distance of 20 feet (Berger et al., 2015). HVAC noise would be less than 48 dBA at the nearest commercial and residential receptors from the site, which is below the City’s noise thresholds for operational noise.

Loading docks are potential noise sources. Although trucks on site would be moving at low speeds, the engine noise could be audible at nearby locations. As discussed in Section 2.2 and shown on Figure 2-4 of Appendix D, loading docks would be located on the north side of the casino building, approximately 1,200 feet from the nearest residence and approximately 250 feet from the nearest commercial facility. Based on similar commercial projects, idling trucks at loading docks have the potential to generate a noise level of up to 63.0 dBA Leq at a distance of 100 feet from the source (j.c. brennan, 2010). Loading dock noise would be less than 57 dBA at the nearest commercial receptor, and less than 45 dBA at the nearest residential receptor, both of which are below the City’s acceptable noise levels. Noise levels from truck movements at the loading docks would be also shielded by the surrounding proposed buildings, further reducing the noise levels at the nearest sensitive receptors.
Commercial uses do not include sources of perceptible vibration. Therefore, because the Proposed Project Alternative would not result in vibration and noise levels at nearby sensitive receptors and would not exceed the federal noise abatement criteria, no significant adverse impacts would occur.

4.11.2 Reduced Intensity Alternative
The Reduced Intensity Alternative would result in operational noise levels lower than those presented for the Proposed Project Alternative (refer to Section 4.11.1) because the scope of the Reduced Intensity Alternative is smaller than the Proposed Project Alternative and the increase in traffic volumes would be approximately 87 percent of those for the Proposed Project Alternative (refer to Appendix K). Additionally, construction duration and activities would be similar but reduced because the Reduced Intensity Alternative is approximately 82 percent of the size and intensity of the Proposed Project Alternative. Therefore, implementation of the Reduced Intensity Alternative would not result in significant adverse impacts to the ambient noise environment.

4.11.3 Non-Gaming Alternative
Construction duration and activities would be similar to the Proposed Project Alternative (refer to Section 4.11.1) but reduced because the Non-Gaming Alternative’s development footprint is approximately 72 percent of the size and intensity of the Proposed Project Alternative. The construction worker and vendor trips would be lesser than under the Proposed Project Alternative. However, the hauling trips would be greater, resulting in a total of 4,406 PCE construction trips per day, which would still result in an increase of less than 1.0 dBA from construction traffic noise. However, the mix of land uses under the Non-Gaming Alternative would result in greater operational noise levels than those presented for the Proposed Project Alternative, as the increase in traffic volumes would be approximately 60 percent greater than those for the Proposed Project Alternative (refer to Appendix K). The Non-Gaming Alternative would add approximately 3,487 ADT to Date Palm Drive, and approximately 4,765 ADT to East Palm Canyon Drive. This would result in noise increases along these roadways of 0.71 dBA and 0.49 dBA, respectively, which is below the FICON noise thresholds. Further, the operational vibration and other noise sources from the Non-Gaming Alternative would be similar to the Proposed Project Alternative. Therefore, implementation of the Non-Gaming Alternative would not result in significant adverse impacts to the ambient noise environment.

4.11.4 No Action Alternative
Under the No Action Alternative, the North Site would not be taken into trust and no development would occur. No construction or operational noise from mobile or stationary sources would occur; therefore, no adverse impacts would occur.

4.12 Hazardous Materials
4.12.1 Proposed Project Alternative
Incidents associated with hazardous materials that would be most likely to occur during construction include the incidental release of fuels, oil, and grease during the operation of construction equipment, as well as accidental releases associated with handling and transferring hazardous material-containing substances. Typical construction management practices limit the incidence of such accidental releases. In addition, the CWA requires that stormwater management BMPs be implemented during construction in accordance with a SWPPP. The SWPPP would further ensure that incidental releases of hazardous materials would not migrate off site during a storm event.

Although no hazardous materials issues are known to be associated with the North Site, the possibility exists that undiscovered contaminated soil and/or groundwater is present on the site due to the migration of hazardous materials from off-site properties or unknown hazardous materials dumping, or that construction personnel could encounter concrete piping from previous development that may contain asbestos. This could pose a risk to human health and/or the environment. BMPs presented in Section 2.2.3 and mitigation measures provided in Section 5.0 would minimize or eliminate adverse effects from undiscovered contaminated materials.

During operation of the Proposed Project Alternative, small quantities of cleaning materials, solvents, pesticides, herbicides, fuels, and paints would be stored and used throughout the proposed facilities. These materials are
common to most commercial operations and do not pose any unusual or substantial threat to public health and safety, even if stored or used improperly, because of the relatively small quantities involved. Therefore, with proper handling and storage, operation of the Proposed Project Alternative would not result in significant adverse effects associated with hazardous materials.

### 4.12.2 Reduced Intensity Alternative

The Reduced Intensity Alternative would be similar to the Proposed Project Alternative (refer to Section 4.12.1) with regards to construction-related hazardous materials impacts; however, these impacts would be somewhat diminished in scope due to the reduced size of development proposed under this alternative. The recommended measures presented in Section 2.2.3 and mitigation measures provided in Section 5.0 would minimize or eliminate adverse effects from the unanticipated discovery of hazardous materials during construction of the Reduced Intensity Alternative.

The types of hazardous materials that would be stored, used, and generated during the operation of the Reduced Intensity Alternative would be similar to those described under the Proposed Project Alternative; however, the amount would be smaller due to the reduction in size of development components under the Reduced Intensity Alternative. As discussed for the Proposed Project Alternative, with proper handling and storage, operation of the Reduced Intensity Alternative would not result in significant adverse effects associated with hazardous materials.

### 4.12.3 Non-Gaming Alternative

The Non-Gaming Alternative would be similar to the Proposed Project Alternative (refer to Section 4.12.1) with regards to construction-related hazardous materials impacts; however, these impacts would be somewhat diminished in scope due to the reduced size of development proposed under this alternative. The BMPs presented in Section 2.2.3 and mitigation measures provided in Section 5.0 would minimize or eliminate adverse effects from the unanticipated discovery of hazardous materials during construction of the Non-Gaming Alternative.

The Non-Gaming Alternative would be similar to the Proposed Project Alternative in most aspects related to potential operational impacts from hazardous materials. Therefore, as with the Proposed Project Alternative, no significant impact associated with hazardous materials would occur during construction or operation of the Non-Gaming Alternative.

### 4.12.4 No Action Alternative

Under the No Action Alternative, neither of the North Site would be taken into trust, and no development would occur in the near-term. Therefore, no significant effects from the use, storage, or handling of hazardous materials would result from this alternative.

### 4.13 Cumulative Impacts and Indirect Effects

#### 4.13.1 Cumulative Setting

Cumulative impacts are defined by the CEQ as effects “on the environment which result from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions” (40 CFR §1508.7). There are several major development projects proposed, planned, and/or currently being constructed in the region. A listing of the projects, including the acreage and status of the development, is provided in Table 4-9. As shown in Table 4-9, within approximately 10 miles of the North Site, there are approximately 158 acres of planned and ongoing development within the region. Additionally, the Tribe is currently planning several development projects, including an expansion of the Agua Caliente Resort Spa in Rancho Mirage (including 310 hotel rooms, 41,000 sf of meeting space, 120,000 sf of commercial space, 25,000 sf of restaurant, and 58,000 sf of gaming floor), a large-scale cultural center and spa complex in downtown Palm Springs (48,000 sf gallery), and an expansion of the Agua Caliente Spa Resort Casino in Palm Springs (including 68,000 sf of gaming floor, 350 hotel rooms, 60,000 sf of meeting space, 50,000 sf of mixed use/retail space, and a 40,000-sf spa/fitness center).
### TABLE 4-9
PLANNED DEVELOPMENT PROJECTS WITHIN THE REGION

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Acres</th>
<th>Distance to North Site (miles)</th>
<th>Project Location</th>
<th>Project Description</th>
<th>Project Status as of June 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City of Cathedral City</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pending Downtown Development</td>
<td>13.5</td>
<td>&lt;1</td>
<td>East Palm Canyon Drive and Van Fleet Avenue</td>
<td>Mixed-use development to include a lifestyle retail center, hotel, and residences.</td>
<td>Pending</td>
</tr>
<tr>
<td>Quick Quack Car Wash</td>
<td>1.63</td>
<td>3.3</td>
<td>Ramon Rd. and Avenida Ximino</td>
<td>Full service car wash facility with outdoor vacuums.</td>
<td>Pending</td>
</tr>
<tr>
<td>Carlos Campos Pest Control</td>
<td>&lt;1</td>
<td>3.4</td>
<td>68761 Aliso Rd.</td>
<td>Pest control building, parking lot, outdoor storage area for vehicles.</td>
<td>Approved</td>
</tr>
<tr>
<td>CCBC Resort Runway Restaurant</td>
<td>&lt;1</td>
<td>&lt;1</td>
<td>68300 Gay Resort Drive</td>
<td>Restaurant with outdoor patio dining area within an existing resort hotel.</td>
<td>Approved</td>
</tr>
<tr>
<td>Cathedral City Senior Living</td>
<td>4.96</td>
<td>2.1</td>
<td>67670 Carey Rd.</td>
<td>Senior living facility with 140 living units.</td>
<td>Approved</td>
</tr>
<tr>
<td>Ramon 19</td>
<td>19.14</td>
<td>4.3</td>
<td>69375 Ramon Rd.</td>
<td>Medical cannabis cultivation and production facility to be constructed in two phases over the next three years.</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Best Western Plus Hotel</td>
<td>9</td>
<td>6.4</td>
<td>I-10/Bob Hope intersection</td>
<td>91-room hotel joined by adjacent fast food options.</td>
<td>Under Construction</td>
</tr>
<tr>
<td>The District</td>
<td>7</td>
<td>2</td>
<td>Cree Rd. and Carey Rd.</td>
<td>47 single-family units with common areas including recreational amenities.</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Ecoplex Park</td>
<td>2.8</td>
<td>1.5</td>
<td>67905 East Palm Canyon Drive</td>
<td>Construction of two warehouse-style buildings that will house a medical cannabis cultivation operation.</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Horizon Gardens</td>
<td>--</td>
<td>--</td>
<td>Cathedral City</td>
<td>Addition of 28 units to a senior living facility.</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Alchemy Works</td>
<td>6.51</td>
<td>1.3</td>
<td>67575 Canyon Plaza</td>
<td>Cannabis cultivation facility</td>
<td>Pending</td>
</tr>
<tr>
<td><strong>City of Rancho Mirage</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Estilo Tract 34227</td>
<td>0.43</td>
<td>5.1</td>
<td>72-277 Victory Drive</td>
<td>Single family housing</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Bella Clancy</td>
<td>--</td>
<td>4.2</td>
<td>Rancho Palmeras east of Follansbee Rd.</td>
<td>Modification to allow 15 ft. setbacks for side entry garages. Construction of 20 single family homes</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Mirada Villas</td>
<td>27</td>
<td>1.8</td>
<td>North of Frank Sinatra Dr. across from The Ritz</td>
<td>Single family housing - 46 units</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Ken Catanzarite</td>
<td>--</td>
<td>1.5</td>
<td>South of Mirage Cove Dr. at Highway 111</td>
<td>Single family housing - 20 units</td>
<td>Approved</td>
</tr>
<tr>
<td>Horizon pacific, Rancho Cove, MSA Consulting</td>
<td>13.05</td>
<td>0.8</td>
<td>Highway 111 &amp; One Mirage Place</td>
<td>Hotel &amp; single family housing</td>
<td>Under Review</td>
</tr>
<tr>
<td>RMSW LLC</td>
<td>23.71</td>
<td>1.3</td>
<td>W. Side Highway 111/Frank Sinatra &amp; Mirage Cove</td>
<td>Resort and Condominium</td>
<td>Approved</td>
</tr>
<tr>
<td>Rancho Mirage Rehabilitation Hospital, Inc.</td>
<td>9.69</td>
<td>3.6</td>
<td>Ramon Rd. and DaVall Dr.</td>
<td>Rehabilitation center</td>
<td>Under Construction</td>
</tr>
</tbody>
</table>
### Project Name | Acres | Distance to North Site (miles) | Project Location | Project Description | Project Status as of June 2018
---|---|---|---|---|---
City of Palm Springs
Canyon View / Summit Project | 14.83 | 2.4 | SW corner of East Palm Canyon Dr. & Matthew Dr. | Single family housing | Approved
Porsche Car Dealership | 2.7 | 3.1 | 3737 East Palm Canyon Dr. | Auto Sales | Approved

Source: Cathedral City Economic Development Department, 2018; Appendix K; City of Rancho Mirage, 2018.

In addition to the buildout of the projects listed above, the cumulative impact analysis within this EA and associated technical studies conservatively assumed a 1.5 percent annual growth rate for the population of the surrounding region until 2040 (Appendix K). Cumulative impacts for each environmental issue area are discussed below.

#### 4.13.2 CUMULATIVE IMPACTS

Unless otherwise specified below, the following analysis applies to the Proposed Project Alternative, Reduced Intensity Alternative, and the Non-Gaming Alternative, referred to collectively as project alternatives or the development alternatives.

**Land Resources**

The principal effects to land resources associated with any future development in the vicinity of the North Site would include localized, minor topographical changes and soil attrition. Other projects in the area would be required to implement measures consistent with local permitting requirements for construction to address any regional geotechnical, seismic, or mining hazards. It is anticipated that approved developments would follow appropriate permitting procedures; therefore, implementation of the development alternatives would not contribute to cumulatively considerable adverse impacts to land resources.

**Water Resources**

Effects related to water supply for the development alternatives are discussed in Section 4.2. The projected water demands for the Proposed Project Alternative and Reduced Intensity Alternative are approximately 38 AFY and 36 AFY, respectively, which represents only approximately 0.02 percent of the 189,700 AFY of total outflows anticipated to occur from the western portion of the Coachella Valley Groundwater Basin in 2045 (CVWD, 2011); the Non-Gaming Alternative’s demand of 27 AFY represents only approximately 0.01 percent. Therefore, the demand associated with the development alternatives and future developments would not significantly affect surface or groundwater levels in the vicinity of the North Site. Furthermore, projects that may be constructed in the vicinity of the North Site are required to comply with the CWA as it relates to stormwater and point source discharges. Compliance with USEPA’s stormwater pollution prevention requirements, adherence to the BMPs listed in Section 2.2.3, and the fact that 100 percent of stormwater flows associated with a 100-year, 3-hour storm event would be retained on site would prevent development associated with the development alternatives from contributing to cumulatively considerable adverse stormwater-related effects. Therefore, implementation of the development alternatives would not contribute to cumulatively considerable adverse impacts to water resources.

**Air Quality**

*Operational Emissions*

Past, present and future development projects contribute to a region’s air quality conditions on a cumulative basis; therefore by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of the NAAQS. If a project’s individual emissions contribute toward exceedance of the NAAQS, then the project’s cumulative impact on air quality would be significant. In developing attainment designations for criteria pollutants, the USEPA considers the relevant region’s past, present and future emission levels. As stated in Section 3.0 and Appendix N, the USEPA has designated the SSAB as nonattainment (Severe 15) for O₃ and nonattainment (serious) for PM₂.₅. All other NAAQS are designated as unclassified or in attainment. The main source of CAP emissions from foreseeable development is mobile...
sources from automobiles, the generation of which will be reduced as fuel efficiency increases. As automobiles use less, or even run without gasoline, emissions of CAPs per mile will decrease.

Emission estimates for the development alternatives in the cumulative year 2040 were estimated using the CalEEMod air quality modeling program and are included in Appendix N. Increased gas mileage and improved fleet emission controls of trucks and vehicles in the future are accounted for in CalEEMod. The increase in future gas mileage is attributed to improved fuel efficiency technology and stricter federal and state regulations. Therefore, under future year conditions, emissions resulting from the development alternatives are expected to be less than opening year, and would continue to be below de minimis thresholds. The development alternatives would not cumulatively adversely impact the region’s air quality, and BMPs listed in Section 2.2.3 as well as mitigation measures provided in Section 5.0 would further reduce project-related emissions.

**Climate Change**

**Methodology**

Climate change is a global issue that is not being caused by any single development project, but by global cumulative increases in atmospheric GHG concentrations. Thus, global warming is most effectively addressed on a global or regional level. California’s global warming policies and legislation (most notably Executive Order [EO] S-3-05 and Assembly Bill [AB] 32) are intended to be regional approaches to ensure that statewide emissions are reduced substantially in the future (to levels much lower than existing levels).

No project-specific quantitative limits have been established by Riverside County, the California Air Resources Board (CARB), USEPA, or any other state or federal agency for climate change or GHG emissions. While there is no federal guidance memo related to the consideration of climate change impacts in NEPA documents (a former 2016 CEQ guidance memorandum was withdrawn with issuance of EO 13783), this EA includes a quantification of GHG emissions resulting from the development alternatives (in carbon dioxide equivalents [CO$_2$e]) and a discussion of reduction measures to address comments received during scoping.

In addition to quantification of GHG emissions and recommended reduction measures, this EA considers the impacts of the development alternatives in relation to the GHG reduction targets established by the state of California and compliance with Cathedral City’s Climate Action Plan (CCCAP). Due to the inherent nature of climate change, GHG impacts are considered to be exclusively cumulative impacts. Therefore, assessment of significance is based on a determination of whether the GHG emissions from a project represent a cumulatively considerable contribution to the global atmosphere and conforms to the applicable CARB, CAT, and CCCAP measures.

**Impact Assessment**

Development of the project alternatives would result in an increase in GHG emissions related to construction, mobile sources (trips generated by the project), stationary sources (components of the development alternatives that directly emit GHGs from the combustion of natural gas or diesel in boilers, emergency generators, and HVAC units), and indirect sources related to electricity (combustion of fuels use to produce electricity), solid waste (solid waste decomposition at the landfill and haul trucks), wastewater processing (decomposition of waste and electric and diesel pumps), and water transport (electricity and diesel pumps).

USEPA- and CARB-approved CalEEMod.2016.3.2 was used to estimate construction, area, energy, mobile, stationary, water and wastewater, and solid waste project-related GHG emissions. Model input and output files are provided in Appendix N. The trip generation rates used to estimate GHG emissions are derived from the TIA (Appendix K). Table 4-10 provides a breakdown of project-related GHG emissions for the development alternatives.

GHG emissions resulting from the development alternatives are primarily indirect (either indirect mobile emissions from delivery, patron, and employee vehicles or indirect off-site electricity generation, waste pickup, water and wastewater transport, etc.). The federal government has enacted measures that would reduce GHG emissions from mobile sources, some of which have been accounted for in the air quality model used to estimate...
mobile emissions. BMPs have been incorporated into the project design to reduce project-related GHG emissions and are listed in Section 2.2.3. Construction BMPs include reduced idling of heavy equipment, thereby, reducing CO₂ during the construction of the development alternatives. Operational BMPs would reduce indirect GHG emissions from electricity use, water and wastewater transport, and waste transport through the installation of energy efficient lighting, heating and cooling systems, low-flow appliances, drought resistant landscaping, and recycling receptacles. Operational BMPs would also reduce indirect mobile GHG emissions by requiring adequate ingress and egress to minimize vehicle idling and preferential parking for vanpools and carpools to reduce project-related trips. Therefore, with the implementation of all GHG reduction measures into the project design, the development alternatives would not result in a significant adverse cumulative impact associated with climate change.

### TABLE 4-10
PROJECT-RELATED UNMITIGATED ANNUAL GHG EMISSIONS – ALL ALTERNATIVES

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>GHG Emissions (MT CO₂e)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Proposed Project Alternative</td>
</tr>
<tr>
<td>Construction1</td>
<td></td>
</tr>
<tr>
<td>Construction</td>
<td>986</td>
</tr>
<tr>
<td>Operation</td>
<td></td>
</tr>
<tr>
<td>Area</td>
<td>0</td>
</tr>
<tr>
<td>Mobile (Vehicle Trips)</td>
<td>7,044</td>
</tr>
<tr>
<td>Stationary Sources</td>
<td>802</td>
</tr>
<tr>
<td>Energy Usage</td>
<td>2,467</td>
</tr>
<tr>
<td>Solid Waste</td>
<td>339</td>
</tr>
<tr>
<td>Water/Wastewater</td>
<td>189</td>
</tr>
<tr>
<td><strong>Operation Subtotal</strong></td>
<td><strong>10,841</strong></td>
</tr>
<tr>
<td><strong>Total Project-Related GHG Emissions</strong></td>
<td><strong>11,827</strong></td>
</tr>
</tbody>
</table>

Notes: 1 – Construction is based on a 12-month schedule and will only occur during the year 2019. Source: CalEEMod, 2016.

As discussed in Appendix N, CARB identifies the GHG reduction targets of the state and the types of measures that will be used to reach them in California’s adopted Climate Change Scoping Plan. Of the approximately 126 strategies and measures identified in the Scoping Plan that would achieve a statewide reduction in GHG emissions, only two would apply to the development alternatives (refer to Table 4-11). The other policies do not apply to the development alternatives because they either apply to state entities, such as CARB, are planning-level measures, or they apply to particular industries, such as the auto repair industry. In addition to the State’s GHG reduction targets, CCCAP identifies strategies to reduce GHG emissions. As shown in Table 4-11, the development alternatives would comply with California’s and Cathedral City’s applicable emission reduction strategies.

### TABLE 4-11
COMPLIANCE WITH STATE EMISSIONS REDUCTION STRATEGIES

<table>
<thead>
<tr>
<th>Regulation or Policy</th>
<th>Project Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EO S-3-05 / AB 32 Strategy</strong></td>
<td>The development alternatives would be located on trust land and thus not subject to CARB restrictions on on-site diesel-fueled commercial vehicle idling. BMPs provided in Section 2.2.3 would make the project consistent with this strategy.</td>
</tr>
<tr>
<td><strong>Diesel Anti-Idling:</strong> In July 2004, CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.</td>
<td></td>
</tr>
<tr>
<td><strong>Achieve 50 percent statewide Recycling Goal:</strong> Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and</td>
<td>Solid waste services are expected to be provided by Burrtec, which is subject to the state’s recycling requirements. The development would not affect County diversion goals as waste from tribal land is classified as</td>
</tr>
<tr>
<td>Regulation or Policy</td>
<td>Project Compliance</td>
</tr>
<tr>
<td>---------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>production as well as methane emission from landfills. A diversion rate of 48 percent has been achieved on a statewide basis. Therefore, a 2 percent additional reduction is needed.</td>
<td>out-of-state waste and is not calculated in local waste diversion statistics. Although the diversion stream will not be affected, the waste stream would increase. BMPs provided in Section 2.2.3 would make the project consistent with this strategy.</td>
</tr>
<tr>
<td><strong>Water Use Efficiency:</strong> Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions.</td>
<td>With implementation of BMPs provided in Section 2.2.3, water use would be reduced through installation of low-flow appliances and the installation of drought-tolerant landscaping, which would make the project consistent with this strategy.</td>
</tr>
</tbody>
</table>

**Cathedral City CAP**

**Solid Waste**
- **Diversion:** Increase solid waste diversion to achieve an average annual goal of 65 percent through 2020.
- **Food Waste Composting at Restaurants:** Restaurant composting program for food waste with a goal to reach all restaurants that serve more than 100 meals a day.
- **Recyclable Take-Out Containers:** Promote/mandate take-out alternative containers with a goal to eliminate the use of polystyrene packaging.

**Water**
- **Conservation Ordinance:**
  - Build on and exceed current CVWD water conservation ordinance by 15% community-wide by 2020.
  - Build on ordinance with goal to exceed current commercial-sector water conservation ordinance by 20 percent community-wide by 2020.
- **Drought Tolerant Planting:** Promote and augment City, DWA and CVWD rebates for drought tolerant planting, turf replacement and buy-back.

**Commercial Buildings**
- **Peak Demand Reduction:** Collaborate with SCE and encourage 200 businesses to enroll in Energy Efficiency and Demand Response programs such as the Summer Discount Program.
- **Energy-Efficient, Commercial-Sector Lighting:** With DCEP promote and leverage existing incentives for efficient lighting with special local focus on building owner education and action with goal to eliminate any remaining T-12 lamps in commercial buildings.
- **“The Temperature Club”:** Promote community partnership through policies to adjust indoor temperatures to save/degree.
- **Lighting Controls:** Promote SCE programs to encourage energy-efficient lighting linked to building controls and occupancy sensors.
- **“Cool Roofs”**: Promote the installation of reflective roofing on commercial properties in the community with recognition for first ten early adopters.

**Governmental Initiatives**
- **Commercial PACE Program:** Partner and aggressively promote commercial PACE program to provide commercial property owners—from retail to resorts—with property-secured funding for 100% of the cost of energy efficiency upgrades/renewable energy installations.
- **Green Building Program:** Promote Voluntary Green Building Program to prepare for enhanced Title 24 requirements and green building standards.
- **Green Building Support Services:** Advance the Voluntary Green Building Program to mandatory green building requirement with technical support services.
- **New and Efficient Construction:** Promote the Savings by Design Program from SCE for new commercial buildings.

The Cathedral City CAP identifies the solid waste diversion strategy as a residential measure; therefore, the retail and recreational land uses that would be developed as a result of the development alternatives would not be subject to this reduction strategy. However, the project would work to achieve City waste diversion goals through the implementation of the 50 percent statewide recycling goal as discussed above. In addition, all restaurants developed under the development alternatives serving greater than 100 meals per day would be encouraged to implement a composting program for food waste, and the Tribe will promote/mandate the use of non-polystyrene take-out containers. These measures are included as BMPs in Section 2.2.3.

The Tribe will implement the BMPs provided in Section 2.2.3, including the installation of low-flow appliances and drought-tolerant landscaping. These measures will help achieve the City’s water conservation goals.

All proposed facilities would be designed to be energy efficient, consistent with the BMPs incorporated into the project design listed in Section 2.2.3.

The Tribe shall install energy efficient appliances in all buildings in accordance with the BMPs provided in Section 2.2.3. The buildings will be constructed generally consistent with Title 24 requirements and green building standards as adopted under the Tribal Building and Safety Code.
<table>
<thead>
<tr>
<th>Regulation or Policy</th>
<th>Project Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Transportation</strong></td>
<td>All workplaces shall promote employee rideshare programs and the use of nearby mass transit. Preferential parking for ZIP cars and other rideshare vehicles shall be implemented in accordance with the BMPs outlined in Section 2.2.3 to further promote workplace and consumer ridesharing. The Tribe shall consider and to the extent feasible will incorporate preferential parking for Plug-In Electric Vehicles, along with the installation of corresponding EV charging stations into the project design. In addition, the Tribe shall provide shuttle service to and from population centers as feasible.</td>
</tr>
</tbody>
</table>
| - **Car-Pooling and Mass Transit**: Promote “Shared Vehicle at Work” programs with a goal to increase carpooling and mass transit by 20% with a “guaranteed-ride home”.  
- **Charging Stations**: Foster public/private partnerships to promote 10 additional public access EV charging stations for existing EV and NEV fleets.  
- **Van Pools**: Partner and recognize all CC major employers with over 50 employees for van pools.  
- **Car Sharing**: Promote ZIP and/or other Car Share programs through preferential parking and promotion with signage with a goal to serve 5% of existing drivers who each reduce their driving by 25%.  
- **Plug-In Electric Vehicle Charging Stations**: Seek grant funding to install 10 EV charging stations on public and private property and promote Plug-In Electric Vehicles for public use.  
- **Visitor Shuttles**: Collaborate with local hotels and resorts to support and establish effective point-to-point transportation for visitors, e.g. shuttles to airports, hotels, and business districts. | |

Notes: EO = Executive Order; AB = Assembly Bill.  
Source: CARB, 2017; City of Cathedral City, 2013.

The effect of climate change on the development alternatives is also considered in this EA. Average temperature in County could increase, resulting in projected extreme heat days and a greater chance of extreme weather conditions. The intensity of these effects is uncertain and will depend on future GHG emissions worldwide (CEC, 2012).

No characteristics of the development alternatives are unique or especially vulnerable to the impacts from climate change. The effects of increasing temperatures and frequency of extreme heat days or extreme weather conditions will be dampened by the use of on-site HVAC. The North Site is located at approximately 300 feet above mean sea level and thus are not susceptible to impacts from sea level rise. The North Site is located in a primarily urban area, which is adequately served by emergency services and, therefore, is not uniquely sensitive to increased extreme weather conditions as a result of climate change.

**Biological Resources**

The North Site does not contain unique or sensitive ecosystems or biological communities. No federally-listed special-status species have the potential to occur on the North Site. One state-listed special-status species has the potential to occur on or in the vicinity of the site: the western yellow bat, a state-listed species of special concern. Mitigation measures discussed in Section 5.0 require preconstruction surveys prior to construction activities for the western yellow bat as well as for migratory nesting birds, should construction activities occur during the migratory bird breeding season. The North Site does not contain potentially jurisdictional wetlands or Waters of the U.S. Therefore, implementation of the development alternatives would not contribute to cumulatively considerable adverse impacts to biological resources.

**Cultural Resources**

BMPs have been included in Section 2.2.3 to address unknown cultural resources found during project construction, and similar measures would be required for any development in the vicinity of the North Site. With implementation of these BMPs, no cumulatively considerable adverse impacts to cultural resources would occur as a result of construction of the development alternatives.

**Socioeconomic Conditions**

Cumulative socioeconomic effects could occur in the project area as the result of developments that affect the lifestyle and economic well-being of residents. When considered with other growth in the City, particularly the Tribe’s planned expansions of its other two casino resorts in Palm Springs and Rancho Mirage, there may be cumulative socioeconomic effects including impacts to economy, employment, housing availability, problem gambling, and crime. The development alternatives, in addition to the Tribe’s other proposed projects in the
region, would result in beneficial impacts to economic output, tax revenues, and employment, as well as various beneficial impacts to the Tribe. Further, planning documents for the region will continue to designate land uses for businesses, industry, and housing, as well as plan public services to anticipate and accommodate growth in the region. Therefore, no significant cumulative socioeconomic effects would occur.

Transportation/Circulation

2040 Baseline Traffic Volumes
Cumulative baseline traffic volumes include the forecasted traffic from the Cathedral City General Plan traffic model, which utilizes a refined version of the Coachella Valley Area Transportation Study forecasting model (Appendix K). To calculate 2040 volumes from the 2035 traffic model predictions, a 1.5 percent per year increase in traffic volume was assumed. Tables 5-13 and 5-17 of Appendix K shows traffic volumes at study intersections and roadway segments for cumulative baseline conditions (2040) without implementation of the development alternatives. The following study intersections and roadway segments are expected to operate at unacceptable levels of service in the cumulative year:

- Date Palm Drive/Buddy Rogers Avenue;
- Cathedral Canyon Drive/Paseo Real;
- East Palm Canyon Drive between Golf Club Drive and Perez Road;
- East Palm Canyon Drive between Perez Road and Cathedral Canyon Drive;
- East Palm Canyon Drive between Date Palm Drive and Frank Sinatra Drive; and
- East Palm Canyon Drive between Frank Sinatra Drive and Country Club Drive.

2040 Cumulative Year Plus Project Alternatives
Tables 5-13 through 5-15 and 5-17 through 5-19 of Appendix K provide a summary of the LOS at each study intersection and roadway segment, respectively, under cumulative baseline (2040) conditions with implementation of the development alternatives. These tables show that two study intersections and four roadway segments are projected to operate unacceptably in cumulative year 2040 (refer to Section 4.7 for acceptable operation criteria). With the installation of traffic signals and reconfiguration of turning lanes at Date Palm Drive/Buddy Rogers Avenue and Cathedral Canyon Drive/Paseo Real (refer to Section 5.0), the development alternatives would have a less-than-significant impact on study area intersections, as shown in Tables 5-21 through 5-23 of Appendix K. However, because the segments of East Palm Canyon Drive between Golf Club Drive and Canyon Plaza Drive would not increase the v/c ratio by 0.05 or greater, this does not constitute a significant impact. Further, the segments between Date Palm Drive and Country Club Drive are projected to already exceed a v/c ratio of 1.0 under baseline cumulative conditions without project-related traffic. Contributions to traffic funds for roadway improvements, as described in Section 5.0, will reduce roadway segment impacts to less-than-significant levels.

Land Use
If taken into federal trust, the North Site would not be subject to state or local land use jurisdiction. However, development on the North Site would not disrupt neighboring land uses or prohibit access to neighboring parcels. Further, the development alternatives are generally consistent with land use designations within the City’s General Plan. As such, the project would not result in changes to local land use patterns. Future cumulative developments would be subject to City and County land use and zoning restrictions and would be required to comply with General Plan policies. Therefore, no cumulatively considerable adverse land use impacts would occur.

Public Services

Water Supply
The projected water demands for the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative are approximately 38 AFY, 36 AFY, and 27 AFY, respectively, which represents only approximately 0.02 percent, 0.02 percent, and 0.01 percent, respectively, of the 189,700 AFY of total outflows anticipated to occur from the western portion of the Coachella Valley Groundwater Basin in 2045 (CVWD, 2011). As described in detail in Appendix F, the water supply infrastructure in the vicinity of the North Site was
constructed under the assumption that future development on the site would demand significantly more water than is projected under the development alternatives. Additionally, other permitted developments in the region would be required to pay service fees to DWA and fund any infrastructure improvements or modifications required by those developments. Therefore, the construction and operation of the development alternatives in conjunction with other reasonably foreseeable regional development would not result in a cumulatively significant adverse impact to water supply providers.

**Wastewater Service**
As described in Section 4.9.1, under the development alternatives wastewater generated at the North Site would be conveyed by DWA sewage lines to CVWD’s WRP-10 treatment facility, which currently has a significant surplus capacity of approximately 8.5 MGD (compared to the total capacity of 18.0 MGD) to treat wastewater flows from the development alternatives and other future developments in the region. As with the water supply infrastructure, the wastewater conveyance infrastructure in the vicinity of the North Site was sized to accommodate significantly higher wastewater flows than is anticipated to occur under the development alternatives (Appendix F). Furthermore, future development projects would be required to pay service fees to DWA and/or CVWD and fund any improvements or modifications to existing wastewater conveyance and treatment infrastructure necessary to serve these projects. Therefore, development of the project alternatives in conjunction with other reasonably foreseeable projects in the region would not result in a significant cumulative impact to wastewater service providers.

**Solid Waste Service**
Due to the likely excess capacity at Lamb Canyon Landfill (refer to Section 4.9.1), the development of the project alternatives, in conjunction with the other planned development projects listed in Section 4.13.1, would not result in a cumulatively considerable adverse effect to solid waste service.

**Schools**
Implementation of the development alternatives would not substantially increase enrollment or otherwise adversely affect public or private schools. Therefore, development of the project alternatives, in conjunction with the other planned development projects listed above, would not result in a cumulatively adverse effect to school facilities.

**Recreation**
As described in Section 4.9.1, development and operation of the development alternatives would not adversely affect any recreational activities. Therefore, no cumulatively considerable adverse effects would occur.

**Electricity and Natural Gas**
As described in Section 3.0, Appendix H, and Section 4.9.1, there is considerable existing electricity and natural gas infrastructure on and in the vicinity of the North Site, and the development alternatives would not result in significant adverse impacts to electricity or natural gas service providers. The individual planned projects listed above would be responsible for paying development, connection, or user fees to the utility if necessary, to receive services, and the utilities would be compensated for any capital improvements through user rates. Therefore, implementation of the development alternatives would not result in cumulatively considerable adverse effects to electricity or natural gas providers.

**Law Enforcement**
Increased demand for law enforcement services resulting from cumulative developments may require additional facilities, equipment, or employees. New development, including the cumulative projects listed above, would fund in part City services, including law enforcement, through development fees and property tax. In addition, as described in Section 1.4.2, Section 11.7 of the Compact requires that if it is determined that law enforcement, fire protection, emergency medical services, and any other public services will be burdened as a result of the development alternatives despite the mitigation measures identified herein and the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code, prior to commencement of the development alternatives, and no later than the issuance of the Final TEIR the County, the Tribe will offer to commence negotiations with the City and if necessary, the County. These negotiations would allow for all parties
to enter into enforceable intergovernmental agreements with respect to the matters set forth in Section 11.7(a) of the Compact to ensure that the mitigation contemplated herein is sufficient to address cumulative impacts.

**Fire Protection and Emergency Medical Services**

New development, including the cumulative projects listed above, would be required to fund City services, including fire protection and emergency medical services, through development fees and property taxes. Although it is not expected that the development alternatives would require additional fire protection services or emergency medical services from the CCFD that would trigger the need to construct new facilities, as described in Section 1.4.2, Section 11.7 of the Compact requires that if it is determined that law enforcement, fire protection, emergency medical services, and any other public services will be burdened as a result of the development alternatives despite the mitigation measures identified herein and the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code, prior to commencement of the development alternatives, and no later than the issuance of the Final TEIR to the County, the Tribe will offer to commence negotiations with the City and if necessary, the County. These negotiations would allow for all parties to enter into enforceable intergovernmental agreements with respect to the matters set forth in Section 11.7(a) of the Compact to ensure that the mitigation contemplated herein is sufficient to address cumulative impacts.

**Visual Resources**

New development, including cumulative projects listed in Section 4.13.1, would be consistent with local land use regulations, including associated design guidelines. Cumulative effects would include a shift from open, undeveloped lots to views of developed areas, as well as an increase in the density of urban uses within the City and County. However, the development alternatives would be visually compatible with urban land uses in the project vicinity and would be generally consistent with local policies related to design, landscaping, and signage. Additionally, with the implementation of BMPs outlined in Section 2.2.3, the development alternatives would not contribute towards adverse cumulative impacts to visual resources.

**Noise**

Approved projects in the vicinity of the North Site would be required to comply with any applicable noise regulations during construction and operation. In the cumulative year 2040, the development alternatives would not increase traffic volumes over the projected maximum of 4,782 vehicles per day in the opening year (Section 4.11.1); however, there would be an increase in background traffic volumes on local roadways, as captured in the estimated 1.5 percent annual growth rate (Appendix K). The development alternatives’ contribution to traffic volumes under cumulative conditions would not double the current traffic on local roadways and thus would not result in an audible increase in ambient noise levels at nearby sensitive receptors (refer to Section 4.11.1). Therefore, the development alternatives’ contribution to cumulative noise impacts would be less than significant.

**Hazardous Materials**

Any future cumulative development projects in the vicinity of the North Site would be required to comply with applicable federal and state regulations concerning hazardous materials management. With the implementation of BMPs outlined in Section 2.2.3, no cumulatively considerable adverse impacts related to hazardous materials would occur as a result of the development alternatives.

### 4.13.3 NO ACTION ALTERNATIVE

Under the No Action Alternative, it is reasonably foreseeable that under year 2040 cumulative conditions, the North Site would be developed consistent with the current land uses and zoning designations for the properties. Therefore, under cumulative conditions, the No Action Alternative would likely result in similar cumulative effects as those described above for the development alternatives.

### 4.13.4 INDIRECT EFFECTS

According to CEQ regulations, indirect effects are removed in time or in distance from a project, but are caused by the project and are reasonably foreseeable. These include growth-inducing effects, as well as changes in land use, population density, and related effects on natural systems (40 CFR §1508.8).
Construction of Off-Site Traffic Mitigation Improvements

Implementation of the development alternatives would require roadway improvements at the following intersections: Buddy Rogers Avenue/Date Palm Drive and Cathedral Canyon Drive/Paseo Real. These intersections consist of previously disturbed areas with only landscaped vegetation present. Further, the restriping of the intersections does not require widening of the roadway, and installation of traffic signals will result in minimal ground disturbance. No historic properties or known archaeological sites or cultural materials are located within the intersection improvement areas (refer to Appendix J). As no road widening is required, intersection improvements will result in no net loss of habitat, and will not result in adverse impacts to biological resources. Construction of the off-site mitigation improvements would require lane or shoulder closures; however, the closures would be temporary and would not cause a significant traffic impact. Adherence to federal and state environmental regulations during construction of intersection improvements would avoid any potentially significant indirect effects from off-site intersection improvements.

Construction of Off-Site Infrastructure Improvements

Implementation of the development alternatives would require additional water and sewer lines, as shown on Figure 4.9-1 of Appendix D. This includes the placement of an 8-inch sewer main along Buddy Rogers Avenue and a 12-inch water main along East Palm Canyon Drive. No portions of the proposed pipelines would be placed outside of previously disturbed roadways. No historic properties or known archaeological sites or cultural materials are located within the proposed pipeline route (refer to Appendix J). The proposed pipelines pass through ruderal/disturbed habitat. Once construction is complete, the pipeline corridor will be repaved. Utility improvements will result in no net loss of habitat, and will not result in adverse impacts to biological resources. Construction of the off-site infrastructure improvements would require lane or shoulder closures; however, the closures would be temporary and would not cause a significant traffic impact. Adherence to federal and state environmental regulations during utility construction would avoid any potentially significant indirect effects from off-site utility construction.

Growth-Inducing Effects

Although the project is considered an anchor for downtown development within the City, construction and operation of the development alternatives would not in itself induce growth. The number of new employees requiring new facilities (including housing and schools) would not be significant (refer to Section 4.6); as such, no new housing, schools, or other facilities would be constructed as a result of development on the North Site. The project’s contribution to the planned development of the City’s Downtown/Art and Design Village has the potential to induce economic growth within the City. This output would be generated from direct, indirect, and induced economic activity. Indirect and induced output could stimulate further commercial growth; however, such demand would be diffused and distributed among a variety of different sectors and businesses in the City. As such, significant regional commercial growth inducing impacts would not be anticipated to occur under the project. Furthermore, if the project were not approved, similar levels of economic growth in the Downtown/Art and Design Village would still be likely to occur in the future. The construction of the development alternatives would only induce economic growth sooner than if the project were not approved. The development of the City’s downtown area is subject to the City General Plan policies as well as environmental review requirements pursuant to CEQA. Therefore, no significant adverse growth-inducing effects relevant to any environmental issue area would occur.
SECTION 5.0
MITIGATION MEASURES

NEPA requires that, if a project would have significant adverse effects on the environment, mitigation for those impacts must be identified. Mitigation consists of:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.
(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
(c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
(e) Compensating for the impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

Mitigation measures to be implemented during construction and operation of the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative are summarized in Table 5-1 below. All mitigation is enforceable because it is 1) inherent to the project design; and/or 2) required through provisions of the Tribal-State Compact, or federal or state statute, where applicable.

<table>
<thead>
<tr>
<th>Resource Area</th>
<th>Proposed Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality Operation</td>
<td>As shown in Table 3 of Appendix N, operational emissions would exceed de minimis levels for NOx for the Non-Gaming Alternative. Therefore, in addition to the operational air quality BMPs outlined in Section 2.2.3, the following mitigation is recommended for the Non-Gaming Alternative in accordance with CAA General Conformity requirements:</td>
</tr>
<tr>
<td></td>
<td>A. The Tribe shall purchase 27 tons of nitrogen oxides (NOx) emission reduction credits (ERCs) as specified in the Conformity Determination in Appendix O to fully offset NOx emissions with the development of the Non-Gaming Alternative. Because the air quality effects are associated with operation of the facility and not with construction of the facility, real, surplus, permanent, quantifiable, and enforceable ERCs will be purchased prior to the opening day of the facility. ERCs shall be purchased in accordance with the 40 CFR 93 Subpart B, conformity regulations. With the purchase of the ERCs the project would conform to the applicable SIP and result in a less than adverse effect to regional air quality.</td>
</tr>
<tr>
<td></td>
<td>B. Implement ride sharing programs at the North Site.</td>
</tr>
<tr>
<td></td>
<td>C. Use 100 percent electric vehicles at the North Site.</td>
</tr>
<tr>
<td></td>
<td>D. Implement other feasible mitigation measures that are at the North Site, which would reduce project-related NOx and ROG emissions.</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>To prevent violation of state regulations related to state listed special status species imposed for the protection of the environment (40 CFR 1508.27b(10)), the following measures are recommended for the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative to avoid and/or reduce impacts to the western yellow bat:</td>
</tr>
<tr>
<td></td>
<td>A. A qualified biologist shall conduct a habitat assessment of palms within the North Site no more than three days prior to the start of construction occurring within 100 feet of palms. If the habitat assessment reveals suitable palm skirts large enough to accommodate roosting bats, the qualified biologist shall conduct a sunset fly-out survey on palms with skirts. Should bats be detected, identified palms shall be flagged and buffered by 100 feet.</td>
</tr>
<tr>
<td></td>
<td>B. Should the avoidance of identified bat-roosting palms not be feasible, replacement of suitable bat roosting habitat shall occur at a 1:1 ratio elsewhere on the North Site outside clearing limits. Replacement habitat may consist of box bases or similar structures. A qualified biologist shall determine box placement and a 100-foot avoidance buffer will be placed around each box.</td>
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<tr>
<td></td>
<td>C. Palms identified to contain roosting bats that are proposed for removal shall be removed as late in the day as possible to reduce the likelihood of potential bat mortality. On the first day, limbs may be removed as late in the day as possible. This amount of disturbance should cause roosting bats to seek other roosting habitat. The rest of the palm can then be harvested on the afternoon of the second day. A qualified biologist shall be present for the removal of these palms in the event that bats are found to have been roosting.</td>
</tr>
<tr>
<td>Resource Area</td>
<td>Proposed Mitigation</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| **Transportation/ Circulation** | The following measures are recommended for the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative to avoid and/or reduce impacts to potentially nesting migratory birds and other birds of prey in accordance with the federal MBTA:  
  D. If construction activities (e.g., building, grading, ground disturbance, removal of vegetation) are scheduled to occur during the nesting season (February 15–September 15), a preconstruction nesting bird survey shall be conducted by a qualified biologist throughout the areas of suitable habitat within 500 feet of proposed construction activity. The surveys shall occur no more than 14 days prior to the scheduled onset of construction. If construction is delayed or halted for more than 14 days, another preconstruction survey for nesting bird species shall be conducted. If no nesting birds are detected during the preconstruction survey, no additional surveys or mitigation measures are required.  
  E. If nesting bird species are observed within 500 feet of construction areas during the surveys, appropriate “no construction” buffers shall be established. The size and scale of nesting bird buffers shall be determined by a qualified biologist and shall be dependent upon the species observed and the location of the nest. Buffers shall be established around active nest locations. The nesting bird buffers shall be completely avoided during construction activities. The qualified biologist shall also determine an appropriate monitoring plan and decide whether construction monitoring is necessary during construction activities. Monitoring requirements are dependent upon the species observed, the location of the nests, and the number of nests observed. The buffers may be removed when the qualified biologist confirms that the nest(s) is no longer occupied and all birds have fledged.  
  F. If impacts (i.e., take) to migratory nesting bird species are unavoidable, consultation with the United States Fish and Wildlife Service shall be initiated. Through consultation, an appropriate and acceptable course of action shall be established.  

  To prevent violation of federal, state and local policies related to traffic operations imposed for the protection of the environment (40 CFR 1508.27b(10)), the following traffic mitigation measures shall be implemented as identified within the Traffic Impact Analysis for the project alternatives (Appendix K). Prior to the initiation of project construction, the Tribe shall complete the traffic mitigation measures identified below or make an in lieu fair share contribution equivalent to the cost of the mitigation measures identified below to fund completion of the mitigation measures. Notwithstanding the foregoing, the Tribe may complete one of the mitigation measures identified below and contribute its fair share contribution to fund completion of both the mitigation measures.  

  The following mitigation measures are proposed for study intersections under the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative:  

  A. **Buddy Rogers Avenue/Date Palm Drive**: On the eastbound approach, restripe to include one left turn lane and one right turn lane. On the northbound approach, restripe to include one left turn lane and three through lanes. On the southbound approach, restripe to include two through lanes and one shared through-right lane. Install a traffic signal. The percentage of any mitigation cost to the Tribe for the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative is 100 percent.  

  B. **Cathedral Canyon Drive/Paseo Real**: On the eastbound and westbound approaches, restripe to include one shared left-through-right lane. On the northbound and southbound approaches, restripe to include one left turn lane, one through lane, and one shared through-right turn lane. Install a traffic signal. The percentage for any mitigation cost to the Tribe for the Proposed Project Alternative is 16 percent, for the Reduced Intensity Alternative is 15 percent, and for the Non-Gaming Alternative is 21 percent.  

  C. The Tribe shall contribute an equivalent mitigation payment for the Transportation Uniform Mitigation Fee (TUMF), Transit Development Fee, and City Facilities Impact Fees, current at the time of construction.  

| Public Services and Utilities | The following measure is recommended for the Proposed Project Alternative and Reduced Intensity Alternative:  
  A. In accordance with Section 11.7 of the Compact, prior to commencement of the project, and no later than the issuance of the Final TEIR to the County, the Tribe shall offer to commence negotiations with the City and if necessary, the County, related to the provision of public services to meet the increase in demands resulting from the project. These negotiations would occur if it is determined by the City that law enforcement, fire protection, emergency medical services, and any other public services will be burdened as a result of the project despite the voluntary payment of the development impact fees identified in Chapter 3.17 of the City’s Municipal Code as well as other identified mitigation measures. These negotiations would allow for all parties to enter into enforceable intergovernmental agreements with respect to the matters set forth in Section 11.7(a) of the Compact to address the estimated $101,135 net impact anticipated under the Proposed Project Alternative and the estimated $93,933 net impact under the Reduced Intensity Alternative.  

  The following measure is recommended for the Non-Gaming Alternative:  

  B. Prior to operation the Tribe shall enter into a Municipal Services Agreement with the City of Cathedral City to reimburse the Cathedral City Police Department (CCPD) and the Cathedral City Fire Department (CCFD) for
<table>
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<tr>
<th>Resource Area</th>
<th>Proposed Mitigation</th>
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<tr>
<td></td>
<td>quantifiable direct and indirect costs incurred in conjunction with providing law enforcement and fire protection services to address the estimated $131,980 net impact anticipated under the Non-Gaming Alternative.</td>
</tr>
<tr>
<td>Noise</td>
<td>The following mitigation measures will be implemented for the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative during to prevent violation of the Federal Noise Abatement Criteria (NAC) standards used by the FHWA and City and FTA’s guideline vibration damage criteria imposed for the protection of the environment (40 CFR 1508.27b(10)):</td>
</tr>
<tr>
<td></td>
<td>A. The use of vibrational construction equipment shall be restricted such that vibration levels will not exceed 90 VdB at commercial building adjacent to the North Site. Should any vibrational construction equipment be required for construction of the parking lot that results in vibration decibel levels that would exceed 90 VdB at the adjacent commercial building, a buffer or set back may be utilized. The Tribe may elect to establish a landscaped area within this buffer in place of parking facilities.</td>
</tr>
<tr>
<td></td>
<td>B. Prior to construction, it shall be determined if the commercial building adjacent to the western boundary of the North Site is vacant. If it is occupied, or should it become occupied during construction, a temporary sound barrier shall be erected during construction on the western boundary of the North Site to reduce noise levels at adjacent commercial receptors by at least 2 dBA.</td>
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<tr>
<td></td>
<td>C. In coordination with the City, the Tribe shall fund mutually acceptable noise reduction measures along Buddy Rogers Avenue adjacent to the existing parks (Second Street Park and the Cathedral City Dog Park). This may include the construction of a noise wall, additional landscaping, or other noise reduction techniques to attenuate traffic noise levels within the parks. Noise reduction measures should achieve a noise reduction of at least 4 dBA at the parks from traffic along Buddy Rogers Avenue. Should a noise wall be acceptable to the City, the material and height of the wall would be determined in consultation with the City and it is anticipated that the noise wall would need to be at least 4 feet in height.</td>
</tr>
<tr>
<td>Hazardous Materials</td>
<td>The following measures are recommended for the Proposed Project Alternative, Reduced Intensity Alternative, and Non-Gaming Alternative as recommended in the Phase I ESA (Appendix M) to prevent violation of federal and state regulations related to hazardous material imposed for the protection of the environment (40 CFR 1508.27b(10)):</td>
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<tr>
<td></td>
<td>A. Concrete piping/crushed concrete encountered during grading/development should be evaluated by an asbestos consultant prior to removal from the site and subsequent off-site disposal. Any discolored soils, noxious odors, and/or buried objects/debris encountered during clearing and grubbing or future grading and development should be left in place until an experienced environmental professional has had the opportunity to evaluate the conditions, and provide recommendations if needed. An experienced environmental professional should monitor excavation and removal of buried concrete structures and/or debris.</td>
</tr>
</tbody>
</table>
SECTION 6.0
CONSULTATION AND COORDINATION

This section lists persons and agencies consulted during the preparation of this EA. Persons consulted for this EA that are associated with an agency or organization are listed underneath their agency or organization.

AGENCIES, ORGANIZATIONS, AND INDIVIDUALS CONSULTED
United States Department of the Interior, Bureau of Indian Affairs (BIA), Pacific Regional Office
Summary of Consultation and Coordination:
The BIA was consulted regarding the scope and content of this EA.

State Historic Preservation Officer (SHPO)

Native American Heritage Commission (NAHC)
Summary of Consultation and Coordination:
The NAHC was consulted to obtain a list of federally-recognized tribes culturally affiliated with the project area. A copy of the search results is included in Appendix A of Appendix J.

United States Fish and Wildlife Service (USFWS)
Summary of Consultation and Coordination:
USFWS was consulted to obtain a list of federally-listed special status species with the potential to occur in the project area. A copy of the search results is included in Appendix I.

City of Cathedral City (City)
Summary of Consultation and Coordination:
The City was consulted to determine the intersections and roadways that may be impacted as a result of the project, for inclusion within the Traffic Impact Analysis (TIA; refer to Appendix K). Additionally, the City was consulted to determine the appropriate growth rate for 2020 Opening Year Conditions within the TIA.

California Department of Fish and Wildlife (CDFW)
Summary of Consultation and Coordination:
CDFW’s California Natural Diversity Database (CNDDB) was consulted to obtain a list of state-listed special status species with the potential to occur in the project area. A copy of the results of the CNDDB search is included in Appendix I.

California Native Plant Society (CNPS)
Summary of Consultation and Coordination:
CNPS’s Inventory of Rare and Endangered Plants list was consulted to obtain a list of state-listed special status species with the potential to occur in the project area. A copy of the search results is included in Appendix I.

Desert Water Agency (DWA)
Summary of Consultation and Coordination:
DWA’s 2015 Urban Water Management Plan and online information on the system overview, pipelines, and imported water were consulted to obtain the water service information for the district.
Coachella Valley Water District (CVWD)
Summary of Consultation and Coordination:
CVWD’s Coachella Valley Water Management Plan Update, 2015 Urban Water Management Plan, Development Design Manual, and stormwater protection and flood control online information were consulted to obtain the water service information for the district.

Palm Springs Unified School District (PSUSD)
Summary of Consultation and Coordination:
PSUSD’s Current Attendance Boundaries map and 2015-16 School Accountability Report Card were consulted to obtain the public school service information for the district.

Southern California Edison (SCE)
Summary of Consultation and Coordination:
SCE’s Workpapers for the 2015 General Rate Case Application, online webpage, online distribution system interactive map, and West of Devers Upgrade Project Overview were consulted to obtain the electrical service information for the company.

Southern California Gas Company (SoCalGas)
Summary of Consultation and Coordination:
SoCalGas’s Transmission Pipeline Interactive Map and Pipeline Basics document were consulted to obtain the natural gas service information for the company.

Cathedral City Police Department (CCPD)
Summary of Consultation and Coordination:
CCPD’s website was consulted to obtain the law enforcement service information for the department.

Cathedral City Fire Department (CCFD)
Summary of Consultation and Coordination:
CCFD’s 2016 Annual Report was consulted to obtain the fire protection service information for the department.
SECTION 7.0

BIBLIOGRAPHY


Natural Resources Conservation Service (NRCS), 2018. Custom Soil Resource Report for Riverside County, Coachella Valley Area, California, Agua Caliente.


# SECTION 8.0

## PREPARERS

### ANALYTICAL ENVIRONMENTAL SERVICES (AES)

<table>
<thead>
<tr>
<th>Name</th>
<th>Qualifications</th>
<th>Participation</th>
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<tbody>
<tr>
<td>David Zweig, PE</td>
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<td>BA; 13 years of experience</td>
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<td>Bibiana Alvarez</td>
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<td>Graphics</td>
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</table>

### SUBCONSULTANTS

<table>
<thead>
<tr>
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<th>Participation</th>
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<tbody>
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</tr>
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<td>Manuel Pompa, Senior Designer</td>
<td>AS; 16 years of experience</td>
<td>Water/Wastewater, Grading/Drainage</td>
</tr>
<tr>
<td>Nicole Vann, Planner</td>
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</tr>
<tr>
<td>Sky Smith, Senior Designer</td>
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<td>Water/Wastewater, Grading/Drainage</td>
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