



DEPARTMENT OF PUBLIC WORKS
COUNTY OF HUMBOLDT

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June 13, 1997

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Bear River Band of the Rohnerville Rancheria
32 Bear River Drive
Loleta, Ca 95551

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Attention: Wayne Moon

Re: Draft Environmental Assessment for Proposed Gaming Facility on
Singley Road

The purpose of this letter is to follow up our conversation on June 4 regarding the inadequacies of the Environmental Assessment, as determined by this department, for the gaming facility located on Singley Road.

The issues I see for the Department of Public Works are traffic and drainage. The environmental assessment I received indicates there will be significant impacts to the road caused by traffic and does not discuss the impacts caused by surface water drainage to the existing drainage facilities located along and under the County road.

The wetland area at the north part of the sight drains to a culvert under Singley Road. A portion of the rest of the site drains to a swale along the County road, then southerly along the road until it exits cross country after passing through a number of private driveway culverts. Historically, the drainage runoff has been of agriculture property. This has changed by the housing development. Now, it will or could change again significantly, depending how the project site will be graded and where the storm water runoff from the new structures and parking lots will be directed. This needs to be evaluated as part of the project. I could find little to no discussion of storm water runoff in the environmental assessment. A complete hydrology study must be included in the assessment.

The assessment states that a traffic study is recommended (page 32). This study must be included as part of the assessment. The County does not have any criteria adopted that would provide an ADT standard for trip generation of a Casino. I looked at the ITE trip generation book to come up with ideas. The only one use that looks close may be "Video Arcade". It would seem appropriate to use numbers for studies created for similar gaming facilities before and after they have been in operation. Some of the trips should be anticipated to be buses and large RV's. What needs to be looked at, in my opinion, is the intersection of the driveway access to the gaming facility with Singley Road, trips and road capacity northerly along Singley Road to the Loleta Drive overpass to State Highway 101, trips and road capacity southerly along Singley Road to the Fernbridge overpass at Highway 101, the intersection of Echo Lane, and the impacts to existing driveways to the residences along Singley Road. This traffic evaluation should not be directed solely to vehicles, but should also address pedestrians, bicycles, and equestrian uses of Singley Road.

Pages 37 and 38 of the environmental assessment propose to create mitigation for traffic. It may be a start, but these proposed mitigations do not appear to be sufficient to address the potential impacts and are not clear as to what is to be constructed. An engineered plan needs to be created, after approval of the traffic study by the County, in order to establish how the impacts will be mitigated by road construction. After this construction plan is established and approved by the County, there needs to be financial assurances provided for any required construction improvements to the road. The construction plans may require the acquisition of right of way along Singley Road for the road improvements. All construction costs and any acquisition costs would be the responsibility of the Tribe. I cannot envision the gaming facility being under operation, where an environmental document states there will be significant traffic safety problems, without the mitigation improvements being constructed prior to operation.

The shuttle may be a good idea, but I don't believe it will solve the traffic problems. We do not believe they function sufficiently to reduce impacts.

The signing and striping of Singley Road should only be done by the County. An agreement as to who will pay the cost will be required, if the signage and striping is determined by the County to be necessary.

I am not sure of the purpose of the bus pull-outs. The road must be constructed to pass the buses on the travel lanes.

The right hand road prism is a mystery. The intersection must be built to accommodate expected traffic in all directions.

The County will have no control of special events on the site. It would be encouraged that the events be timed properly. Once the building is constructed and with the sovereign nation status of the Tribe, how will the County be assured

the events will be timed to minimize traffic impacts? The only way I can envision assurance is to construct the road in a manner that timing will not be necessary.

I hope this will help you in responding to the environmental document and provide you direction regarding our concerns.

Until these matters are resolved to the satisfaction of the County, this office will not be in a position to issue any approval for an encroachment permit for access to the gaming facility off of Singley Road.

Sincerely,



Harless McKinley
Associate Engineer
Land Use Section
445-7205

cc: L. Robert Ulibarri C/O Visions Enterprises, PO Box 784 Hoopa, CA 95546
Tribal Council of the Bear River Band of the Rohnerville Rancheria
Supervisor Dixon
Charles Stewart, Oasis Corporation, 2744 Central Avenue, McKinleyville
CA 95519