Department of
Community Development
Lori A. Moss, Director

Divisions
Administrative Services
Building Permits & Inspection
Code Enforcement
County Engineering
Economic Development & Marketing
Planning & Environmental Review

May 16, 2014

Wilton Rancheria
9300 W. Stockton Boulevard, Suite 200
Elk Grove, CA 95758
Attn: Raymond Hitchcock, Chairperson

Subject: Revised Notice of Land into Trust Application

Dear Chairperson Hitchcock:

We received your letter dated April 30, 2014 requesting the County's determination as to whether the Wilton Rancheria's proposed use of land is compatible with the County's General Plan land use designations. Pursuant to the Memorandum of Understanding (MOU) between Sacramento County, the City of Elk Grove, and Wilton Rancheria, we are responding to your letter.

The site is located in the unincorporated portion of Sacramento County within the City of Galt's Sphere of Influence (SOI), based on the Assessor Parcel Numbers (APN's) provided in the legal description accompanying your letter. The County General Plan designations for these parcels are Agricultural Cropland and Agricultural Residential. The Agricultural Cropland designation is for those areas most suitable for intensive agriculture. The Agricultural-Residential designation provides for rural residential uses, such as animal husbandry, small-scale agriculture, and other limited agricultural activities. In addition, this area is outside the County's Urban Services Boundary, the ultimate boundary of the urban area in the unincorporated County. Because of these designations, a commercial enterprise such as a casino and associated services are not consistent with the County's General Plan land use designations.

Please note that we submitted a comment letter dated January 2, 2014 to Amy Dutschke, Regional Director with the Bureau of Indian Affairs, Pacific Region, in response to their request for comments on their Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Wilton Rancheria Fee-to-Trust and Casino Project. The County's comment letter highlights many potential consistency issues with the County's General Plan. We have attached the letter for your reference.

Thank you for allowing us the opportunity to provide comments as to the consistency of the County's General Plan land use designations with the proposed gaming facility. As stated in our letter to the Rancheria dated March 22, 2013, we intend to act as cooperating agency on the proposed project, and look forward to working with you.

Sincerely,

Leighann Moffitt
Planning Director

Attachment 1: Letter to Bureau of Indian Affairs dated January 2, 2014
Attachment 2: Letter to Wilton Rancheria dated March 22, 2013

Cc: Bradley Hudson, County Executive
John Whisenhunt, County Counsel
Robert B. Leonard, Chief Deputy County Executive
Lori Moss, Community Development Director
Catherine Hack, Environmental Coordinator
Jason Behrmann, City Manager, City of Galt
Steven P. Rudolph, City Attorney, City of Galt
Laura Gill, City Manager, City of Elk Grove
Jonathan P. Hobbs, City Attorney, City of Elk Grove
Rose Weckenmann, Tribal Attorney, Wilton Rancheria

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January 2, 2014

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

RE: Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Wilton Rancheria Fee-to-Trust and Casino Project, Sacramento County, California

Dear Ms. Dutschke:

Thank you for the opportunity to provide comments on the scope of the proposed Environmental Impact Statement (EIS) for the proposed Wilton Rancheria Fee-to-Trust and Casino project. The site is located in the unincorporated portion of Sacramento County within the City of Galt's Sphere of Influence (SOI). As we pointed out in our letter to the Wilton Rancheria dated March 22, 2013 (enclosed as Attachment 1), a Tribal Project Environmental Document must be prepared, as described in the Memorandum of Understanding (MOU) between Sacramento County, the City of Elk Grove, and Wilton Rancheria.

Although the MOU lists several topics the document must address, we further suggest an evaluation of the following topics, several of which are included in the MOU and expanded here in more detail.

- Loss of farmland – The majority of the site is designated Agricultural Cropland on the County General Plan. This designation is most suitable for intensive agriculture. The proposal will result in the loss of farmland. Several policies in the General Plan, for your consideration, address the loss of farmland, including, but are not limited to the following:

  AG-1. The County shall protect prime, statewide importance, unique and local importance farmlands located outside of the USB from urban encroachment.

  AG-5. Projects resulting in the conversion of more than fifty (50) acres of farmland shall be mitigated within Sacramento County, except as specified in the paragraph below, based on a 1:1 ratio, for the loss of the following farmland categories through the specific planning process

or individual project entitlement requests to provide in-kind or similar resource value protection (such as easements for agricultural purposes):

- prime, statewide importance, unique, local importance, and grazing farmlands located outside the USB;
- prime, statewide importance, unique, and local importance farmlands located inside the USB.

The Board of Supervisors retains the authority to override impacts to Unique, Local, and Grazing farmlands, but not with respect to Prime and Statewide farmlands.

However, if that land is also required to provide mitigation pursuant to a Sacramento County endorsed or approved Habitat Conservation Plan (HCP), then the Board of Supervisors may consider the mitigation land provided in accordance with the HCP as meeting the requirements of this section including land outside of Sacramento County.

Note: This policy is not tied to any maps contained in the Agricultural Element. Instead, the most current Important Farmland map from the Department of Conservation should be used to calculate mitigation.

- Impacts to adjacent farming operations – The proposed development could impact adjacent agricultural operations. The County has a right-to-farm ordinance that is designed to protect the farm operators from incompatible urban uses. In addition, the County encourages the use of buffers to separate incompatible urban uses from farming practices. Two of the General Plan policies are stated below:

AG-3. The County shall permit agricultural uses on buffers, provided such uses are conducted in a manner compatible with urban uses. Buffers shall be used to separate farming practices incompatible with adjacent urban uses. Any homeowners' association or similar entity within the development shall assist in determining compatible use. Buffers shall not adversely conflict with agricultural uses on adjoining property.

AG-4. Prospective buyers of property adjacent to agricultural land shall be notified through the title report that they could be subject to inconvenience or discomfort resulting from accepted farming activities as per provisions of the County's right-to-farm ordinance.

- Buffering along the adjacent agricultural residential parcels – A portion of the site near Twin Cities Road is designated Agricultural-Residential on the County's General Plan diagram. The Agricultural-Residential designation provides for rural residential uses, such as animal husbandry, small-scale agriculture, and

other limited agricultural activities. Development adjacent to this agricultural-residential area could create land use impacts if buffering is not provided between the agricultural-residential uses and the urban uses. We recommend the project design include a minimum 300-500 foot wide buffer to protect nearby agricultural-residential uses, consistent with recommendations contained in the Sacramento County General Plan Agricultural Element.

- Growth inducing impacts – The project has the potential to impact nearby rural uses, especially the agricultural-residential parcels near the northwest corner of Highway 99 and Twin Cities Road. We recommend a thorough analysis of this potential impact given the area is located outside the Urban Services Boundary, the ultimate boundary of the urban area in the unincorporated County. Urban services are not expected to be extended to this area.

- Biological impacts – The site may contain significant biological resources which may be impacted by the proposal. We recommend that a complete biological inventory and analysis be conducted of the project site and surrounding area for potential impacts to special status species, sensitive habitats, and wetlands. In addition, the General Plan designation for the northern portion of the site is Natural Preserve. The Natural Preserve designation is for those areas that may contain critical natural habitat for priority resource protection. Some of the General Plan policies that may apply, but are not limited to the following, are listed below:

  CO-58. Ensure no net loss of wetlands, riparian woodlands, and oak woodlands.

  CO-59. Ensure mitigation occurs for any loss of or modification to the following types of acreage and habitat function:
  - vernal pools,
  - wetlands,
  - riparian,
  - native vegetative habitat, and
  - special status species habitat.

  CO-61. Mitigation should be consistent with Sacramento County-adopted habitat conservation plans.

  CO-75. Maintain viable populations of special status species through the protection of habitat in preserves and linked with natural wildlife corridors.

- Water and sewer infrastructure – This area is outside the Urban Services Boundary, the ultimate boundary of the urban area in the unincorporated County. Urban services are not expected to be extended to this site. The document should address how water and sewer facilities will be provided.

- Traffic and circulation – The project has a potential to increase traffic thereby impacting traffic circulation. These impacts, and any mitigation to reduce or eliminate these impacts, should be addressed.

  Because of the number of acres and location of the proposed project, as well as our knowledge of the operations of other local casino projects in the region, our Department of Transportation anticipates that a significant amount of traffic will be generated and distributed to the adjacent unincorporated county roadways and state facilities. These roadways include SR 99, Twin Cities Road, Franklin Boulevard, Arno Road, Dillard Road, etc. just to name a few. We request that a traffic impact analysis be prepared that will identify impacts on the adjacent roadways and intersections and suggests mitigation measures for those impacts. The roadways mentioned above should be included in the scope of work at a minimum. *Traffic Impact Analysis Guidelines (County of Sacramento, July 2004)* should be used when analyzing county roads and intersections. This document is enclosed as Attachment 2.

  We recommend that Sacramento County Department of Transportation be included in reviewing the scope of work for the traffic analysis prior to the study being completed and will make staff available for this purpose.

- Air quality – The project has the potential to increase air quality impacts through increased vehicle miles traveled, and temporary construction impacts. Two of the General Plan policies that may apply, but are not limited to the following, are listed below:

  AQ-17. Promote optimal air quality benefits through energy conservation measures in new development.

  AQ-22 Reduce greenhouse gas emissions from County operations as well as private development.

- Police and fire services – The proposal could impact the ability to provide an adequate level of emergency services to the project and surrounding area. We recommend a thorough analysis of existing resources to determine service needs. We also recommend incorporating building and site design measures to prevent and reduce criminal activity. Some of the General Plan policies that may apply, but are not limited to the following, are listed below:

  PF-50 Plan and develop law enforcement programs with a perspective toward reducing as well as controlling crime.

  PF-51 Plan and develop law enforcement facilities in keeping with overall needs and the distribution of growth.

  PF-53 Design neighborhoods and buildings in a manner that prevents crime and provides security and safety for people and property; when feasible.

PF-61 Mitigation fees may be established by the Board of Supervisors or Fire Districts for the purpose of funding adequate fire protection and emergency medical response facilities provided they find that such fees are critical and necessary to meet the facility funding needs of the fire district and that existing methods of financing are inadequate.

PF-64 No building permit for new residential or commercial construction shall be issued when there is a Board of Supervisors certified fire district financing plan for any applicable fire district, which provides for mitigation fees, until the applicant has contributed all required mitigation fees.

- Infrastructure Financing – The project has the potential to impact existing and planned public facilities, infrastructure, and County services. Along with identifying needed public facilities and services, we suggest identifying, and assuring, adequate funding sources are available for the construction, provision, operation, and maintenance of the facilities and services. We recommend a strategy to ensure that required facilities and services are cost-neutral to the County's General Fund and existing ratepayers.

- Aesthetics – The site is located within the Scenic Corridor along Highway 99. This Corridor extends 660 feet from the edge of the freeway right of way. Development in this portion of the site could visually impact the traveling public. We suggest including design controls that focus on quality design of buildings, structures, parking areas, landscaping, and signage. In addition, the County's adopted Community Design Guidelines also apply to commercial projects. Compliance with the County's Design Guidelines and Development Standards is strongly urged. We would appreciate reviewing draft development plans to provide feedback before final drawings are approved and construction begins.

- Light and glare impacts – The introduction of urban uses adjacent to agricultural and open space areas, in addition to freeways, could have an adverse impact if not designed properly. The County General Plan includes a policy addressing light impacts.

  LU-31. Strive to achieve a natural nighttime environment and an uncompromised public view of the night sky by reducing light pollution.

- Noise, light, and glare impacts from outdoor venues and events – The environmental document should address any adverse impacts that may be generated from any outdoor venues or events. The County General Plan includes policies pertaining to non-transportation noise sources, including maximum and average indoor and outdoor day and night noise exposure levels. We recommend an analysis of any proposed outdoor venues and events, including both noise and light/glare impacts.

- Impacts to groundwater supply – The environmental document should evaluate potential impacts to groundwater (i.e., elevation, quality, current users, etc.) and long-term groundwater sustainability relative to projected water demands for the proposed project.

- Impacts to water resources – The subject property may contain Waters of the State or Waters of the U.S. Any alterations or work within these areas will require applicable State Fish & Game and U.S. Army Corps of Engineers permits prior to grading or building permit issuance.

We recommend that a drainage study be conducted to analyze all existing and proposed drainage facilities. The study should be completed in accordance with the *Sacramento County Drainage Manual Volume 2: Hydrology Standards*, the Sacramento County Improvement Standards, and the Sacramento County Floodplain Management Ordinance. For private development projects, Sacramento County typically requires developers to meet the following conditions for flood protection and stormwater quality management; we recommend that these or similar conditions be incorporated into the current proposal:

- Minimum pad/floor elevations are required pursuant to the Sacramento County Floodplain Management Ordinance.
- There should be no net loss of storage for any fill placed within the 100-year floodplain without in-kind excavation.
- Incorporate into the site improvement plans stormwater quality measures in conformance with applicable County ordinances & standards, and state and federal law. The project may implement low impact development design pursuant to and consistent with *The Stormwater Quality Design Manual for the Sacramento & South Placer Regions*. Such implementation may be able to reduce the stormwater quality treatment requirement.
- If the total area of the developed or redeveloped impervious surfaces (building rooftop, flat work, and parking areas) equals or exceeds 1.0 acres, incorporate into the site improvement plans permanent stormwater quality treatment measures in conformance with applicable County ordinances & standards, and state and federal law.
- Provide a permanent concrete stamp, or other permanently applied message to the satisfaction of DWR not including paint, which reads "No Dumping-Flows to Creek" or other approved message at each storm drain inlet in the site improvement plans.
- Provide hydromodification mitigation in accordance with applicable County ordinances & standards, and state and federal law.

Note that in the letter to the County from the Wilton Rancheria dated February 19, 2013 contained different Assessor Parcel Numbers (APN's) than what are listed in the Notice of Intent (NOI); therefore, the comments in this letter are based on the APN's contained in the NOI (APN's 148-0010-018, 148-0041-009, 148-0041-006, 148-0041-004, 148-0041-001, 148-0031-007, and 148-0010-060).

Thank you for allowing us the opportunity to provide comments on the NOI. As stated in our letter to you dated March 15, 2013, we intend to act as cooperating agency on the proposed project, and look forward to working with you.

Sincerely,

Cindy Storelli

for Catherine Hack
Environmental Coordinator

Enclosure(s)
Attachment 1: Letter to Wilton Rancheria date March 22, 2013
Attachment 2: Traffic Impact Analysis Guidelines July 2004

Cc: Bradley Hudson, County Executive
Robert B. Leonard, Chief Deputy County Executive
Lori Moss, Community Development Director
Leighann Moffitt, Planning Director
Michael Penrose, Transportation Director
Michael Peterson, Director of Water Resources
Jason Behrmann, City Manager, City of Galt
Laura Gill, City Manager, City of Elk Grove

Attachment 1

Department of Community Development
Lori A. Moss, Director

Divisions
Building Permits & Inspection
Code Enforcement
County Engineering
Planning & Environmental Review

March 22, 2013

Wilton Rancheria
9300 W. Stockton Boulevard, Suite 200
Elk Grove, CA 95758
Attn: Andrew Franklin, Chairman

Subject: Notice of Application of Wilton Rancheria Land into Trust

On February 22, 2013, the County received a copy of your letter dated February 19, 2013 notifying the County of the Rancheria's intent to apply to the Bureau of Indian Affairs to have land located within Sacramento County taken into trust. Pursuant to the Memorandum of Understanding (MOU) between Sacramento County, the City of Elk Grove, and Wilton Rancheria, we are responding to your letter.

The site is located in the unincorporated portion of Sacramento County, based on the Assessor Parcel Numbers (APN's) provided in the legal description accompanying your letter. The General Plan designations for this site are Agricultural Cropland and Natural Preserve. The Agricultural Cropland designation is for those areas most suitable for intensive agriculture, and the Natural Preserve designation is for those areas that may contain critical natural habitat for priority resource protection. In addition, this area is outside the Urban Services Boundary, the ultimate boundary of the urban area in the unincorporated County. Because of these designations, a commercial enterprise such as a casino and associated services are not consistent with the General Plan. Therefore, pursuant to the MOU, the Tribe must prepare the Tribal Project Environmental Document, as described in the MOU. Note that the Assessor's Office has since revised the APN's listed in the legal description. The APN's are now 148-0010-059 and 060 (formerly 148-0010-013 and 055, respectively).

Please note that we have consented to act as a cooperating agency in the National Environmental Policy Act (NEPA) process for the Wilton Rancheria project, as noted in the attached letter to the Bureau of Indian Affairs. Catherine Hack, Environmental Coordinator, will serve as primary County contact in this regard. She can be reached at (916) 874-7183 or hackc@saccounty.net.

If you have any questions, or need anything further, please feel free to contact me at (916) 874-5584.

Sincerely,

Leighann Moffitt
Planning Director

Attachment

cc: Bradley Hudson, County Executive
John Whisenhunt, County Counsel
Laura Gill, City Manager, City of Elk Grove
Jonathan P. Hobbs, City Attorney, City of Elk Grove
Jason Behrmann, City Manager, City of Galt
Steven P. Rudolph, City Attorney, City of Galt
Rose Weckenmann, Tribal Attorney, Wilton Rancheria
Lori Moss, Director, Community Development Department
Catherine Hack, Environmental Coordinator
Krista Whitman, Supervising Deputy County Counsel
Cindy Storelli, Principal Planner

Department of
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Lori A. Moss, Director

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March 15, 2013

Amy L. Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

RE: NEPA Cooperating Agency Invitation – Wilton Rancheria Fee-to-Trust and Casino Project EIS

Dear Ms. Dutschke:

We received your correspondence dated February 25, 2013 requesting our participation as a cooperating agency in the NEPA process for the Wilton Rancheria project. We consent to the request and will act as cooperating agency on the subject project. Catherine Hack, Environmental Coordinator, will serve as primary County contact in this regard. She can be reached at (916) 874-7183 or hackc@saccounty.net.

Thank you for including us in this effort. We look forward to working with you.

Sincerely,

Leighann Moffitt

Leighann Moffitt
Planning Director

827 7th Street, Room 220, Sacramento, CA 95814 • Phone (916) 874-7914 • Fax (916) 874-8343 •
www.saccounty.net
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Attachment 2

Traffic Impact Analysis Guidelines
County of Sacramento
July 2004

A. Need for Study

A traffic impact study is typically required if any of the following are true:

1. The project will generate 100 or more new a.m. or p.m. peak hour vehicle trip-ends.
2. The project will generate 1,000 or more daily vehicle trip-ends.
3. New project traffic will substantially affect an intersection or a roadway segment already identified as operating at an unacceptable level of service.
4. The project may create a hazard to public safety.
5. The project will substantially change the off-site transportation system or connections to it.

A trip-end is defined as either an origin or destination of a trip. For example, a round trip between two locations (home-shopping) creates two trip-ends at each location.

The a.m. peak hour is defined as the peak consecutive hour during the 7-9 a.m. peak period, and the p.m. peak hour is defined as the peak consecutive hour during the 4-6 p.m. peak period. Both are on a weekday. Special time periods may be required depending on the land use.

B. Scope of Study

The Department of Transportation will determine the roadway segments and the intersections that should be analyzed in the traffic study. A proposal for the scope of services shall be prepared by the consultant and submitted for review to the Department of Transportation. Work on the traffic study should commence after the Department of Transportation has approved the scope of work. If the traffic study is to be incorporated into an environmental document, the following steps should be followed in refining the scope of work:

1. Scenarios or alternatives that are necessary for the environmental documentation should be identified.
2. If community input is needed, a draft scope should be presented and any reasonable requests generated from the community input should then be included in the study.
3. The scope of work and study assumptions should be reviewed by key parties (Department of Transportation, Department of Environmental Review and Assessment, Caltrans, others).

In general, the scope of work should include the following:

On-Site Circulation: Review and evaluate access locations, driveway throat depths, and size of major on-site circulation facilities with respect to operations, safety, and continuity with existing and planned facilities.

Off-Site Roadways: Study all locations where: 1) the project circulation system intersects with the existing or planned surrounding street system, and 2) project traffic may substantially affect the operation of a roadway or intersection.

Transit: Discuss all bus routes or rail lines that have, or will have a station or stop within 1/4 mile of the project.

Freeway Ramps: Study all freeway ramps that may be substantially affected by the project. Evaluate merge/diverge and weaving conditions, as appropriate.

Freeway: Study all freeway sections that may be substantially affected by the project.

Bicycles: Identify any existing or planned (Sacramento County Bicycle Master Plan) facilities that will be modified by the project or are within 1/4 mile of the project.

Pedestrians: Identify any significant pedestrian facilities that will be affected by the project.

Trucks: For industrial/surface mining projects, identify the number of truck trips that will be generated and design accommodations necessary to support these trucks.

Other subject areas (such as traffic safety, residential impacts, etc.) should also be analyzed as warranted by individual circumstances.

C. Study Scenarios

Traffic impact studies should incorporate the following scenarios, unless directed otherwise by the Department of Transportation:

1. Existing Condition
2. Existing Plus Project Condition
3. Cumulative (2025) Condition
4. Cumulative (2025) Plus Project Condition

The determination of study time periods for each project shall be made in consultation with the Department of Transportation and be based upon the peaking characteristics of the project traffic and the surrounding street system. Even though most studies would include weekday a.m. and/or p.m. peak hour analysis, special circumstances may require mid-day or weekend analysis.

Weekday traffic counts should be conducted on Tuesdays, Wednesdays, or Thursdays (excluding weeks with a holiday). If possible, the counts should be conducted on days when schools are in session. Peak hour counts should be conducted for the two hours between 7 and 9 a.m. for the a.m. peak, and between 4 and 6 p.m. for the p.m. peak. Mid-day and weekend counts are project-specific and should be conducted after consultation with the Department of Transportation.

D. Traffic Data

Trip Generation: The latest edition of the Institute of Transportation Engineers' (ITE) *Trip Generation*, or the San Diego Association of Governments' *San Diego Traffic Generators*, shall be used for trip generation forecasts. Counts at comparable locations may be acceptable for specific or unique uses. Whenever possible these rates should have data from multiple study locations. Trip generation rates should be verified by the Department of Transportation.

Pass-By Trips: Professional sources are acceptable as sources for pass-by trip percentages. All pass-by trips should be distributed through the project driveways and be redistributed at adjacent intersections, as appropriate. All pass-by trip percentages should be verified by the Department of Transportation.

Trip Distribution: Trip distribution patterns for a project can use existing traffic counts, a regional transportation model (project only assignment), or local knowledge. The trip distribution assumptions shall be reviewed by the Department of Transportation.

Travel Forecasting: Data from the current version of the SACMET transportation forecasting model or other regional models should be used in projecting future traffic levels. The land use assumptions in the vicinity of the project should be verified at the TAZ level by comparing the model assumptions with the project assumptions and other sources (general plan, specific plans, and community plans). As needed, the model should be disaggregated in the vicinity of the proposed project to provide sufficient detail to properly analyze study area facilities. The Department of Transportation should verify all model assumptions and modifications.

Trip Reduction: Any trip reductions associated with a Transportation Management Plan (TMP) should not be included in the impact analysis because the effectiveness of the TMPs is not sufficiently predictable or enforceable. However, a trip reduction program can be considered as a mitigation measure provided that results can be demonstrated for comparable projects and that a monitoring/enforcement mechanism is clearly defined. A comparable physical improvement measure shall be identified for all locations that rely upon a trip reduction program for mitigation. The physical improvement measure will serve as a contingency should the predicted trip reduction not be achieved. A deposit/bond will be collected to implement the improvements needed due to the project, should the trip reduction requirement not be met.

E. Traffic Impact Analysis Methodologies

Signalized Intersections: For all signalized intersections, except the intersections with Caltrans facilities, the Circular 212 methodology should be applied with sufficient detail to produce a result measured in volume to capacity ratio and level of service. The following assumptions should be made when calculating the levels of service for an intersection, unless special circumstances justify revision of these assumptions:

Peak Hour Factor (PHF) = 1.0
Passenger Car Equivalent (PCE) = 1.0
Multi-Lane Factor (MLF) = 1.0
Right-Turn on Red Reduction = as justified, but no more than the volume of the adjacent left-turn lane (excluding the U-turns)

Table 1 presents the intersection capacity criteria that should be used for the various traffic signal phase configurations.

For intersections with Caltrans facilities, such as with freeway on- and off-ramps, the most recent version of the Highway Capacity Manual (HCM) methodology should be used.

Table 1
Level of Service Criteria for Signalized Intersections

Level of Service	Sum of Critical Lane Volumes by Signal Phasing (vehicles/critical lane/hour)		
	2-Phase	3-Phase	4 or more Phase
A	0-990	0-930	0-900
B	991-1155	931-1085	901-1050
C	1156-1320	1086-1240	1051-1200
D	1321-1485	1241-1395	1201-1350
E	1486-1650	1396-1550	1351-1500
F	>1650	>1550	>1500

Sources: *Interim Materials on Highway Capacity, Circular 212*, Transportation Research Board, 1980; and County of Sacramento Department of Transportation.

Unsignalized Intersections: The most recent HCM methodology should be applied. A signal warrant analysis should be prepared for all intersections and scenarios where the level of service of an intersection movement exceeds the county acceptable limits. A PHF of 1.0 (to represent average hourly conditions) and PCE of 1.0 should be used, unless special circumstances justify otherwise.

Roadway Segments: Roadway segment analysis should be based on the daily traffic volume thresholds shown on Table 2.

Table 2
Level of Service Criteria for Roadway Segments

Facility Type	# of Lanes	Maximum Volume for Given Service Level				
		A	B	C	D	E
Residential	2	600	1,200	2,000	3,000	4,500
Residential collector with frontage	2	1,600	3,200	4,800	6,400	8,000
Residential collector without frontage	2	6,000	7,000	8,000	9,000	10,000
Arterial, low access control	2	9,000	10,500	12,000	13,500	15,000
	4	18,000	21,000	24,000	27,000	30,000
	6	27,000	31,500	36,000	40,500	45,000
Arterial, moderate access control	2	10,800	12,600	14,400	16,200	18,000
	4	21,600	25,200	28,800	32,400	36,000
	6	32,400	37,800	43,200	48,600	54,000
Arterial, high access control	2	12,000	14,000	16,000	18,000	20,000
	4	24,000	28,000	32,000	36,000	40,000
	6	36,000	42,000	48,000	54,000	60,000
Rural, 2-lane highway	2	2,400	4,800	7,900	13,500	22,900
Rural, 2-lane road, 24'-36' of pavement, paved shoulders	2	2,200	4,300	7,100	12,200	20,000
Rural, 2-lane road, 24'-36' of pavement, no shoulders	2	1,800	3,600	5,900	10,100	17 000

Facility Type	Stops/Mile	Driveway	Speed
Arterial, low access control	4+	Frequent	25-35 MPH
Arterial, moderate access control	2-4	Limited	35-45 MPH
Arterial, high access control	1-2	None	45-55 MPH

Freeway Segments/Ramps: The methodologies acceptable by Caltrans should be used when analyzing Caltrans facilities. These methodologies are listed in the Caltrans *Guide for the Preparation of Traffic Impact Studies*. Generally, Caltrans accepts the HCM and/or the Caltrans Highway Design Manual methodologies for analysis of freeway and highway segments, ramps and ramp junctions, weaving areas, and intersections.

Microsimulation: The use of microsimulation to evaluate difficult or complex traffic conditions is acceptable. The method of analysis and assumptions need to be accepted by the Department of Transportation prior to use.

F. Acceptable Levels of service

The County defines the minimum acceptable operation level for its roadways and intersections to be LOS D for rural areas and LOS E for urban areas. The urban areas are those areas within the Urban Service Boundary as shown in the Land Use Element of the Sacramento County General Plan. The areas outside the Urban Service Boundary are considered rural.

G. Environmental Impacts

The traffic study must identify the significant environmental effects of the proposed project. In describing the significant impacts, the traffic study should identify whether the impacts are avoidable (where the environmental effect of the proposed project reaches the threshold of significance but feasible mitigation measures are available to reduce the impact to a less-than-significant level), or unavoidable (where no feasible mitigation is available to reduce the impact to a less-than-significant level).

The following thresholds of significance shall be used to determine if an impact is significant and requires mitigation:

Roadways/Signalized Intersections: A project is considered to have a significant effect if it would:

- result in a roadway or a signalized intersection operating at an acceptable LOS to deteriorate to an unacceptable LOS; or
- increase the V/C ratio by more than 0.05 at a roadway or at a signalized intersection that is operating at an unacceptable LOS without the project.

Unsignalized Intersections: A project is considered to have a significant effect if it would:

- result in an unsignalized intersection movement/approach operating at an acceptable LOS to deteriorate to an unacceptable LOS, and also cause the intersection to meet a traffic signal warrant; or
- for an unsignalized intersection that meets a signal warrant, increase the delay by more than 5 seconds at a movement/approach that is operating at an unacceptable LOS without the project.

Freeway Ramps: A project is considered to have a significant effect if it would:

- result in a facility operating at an acceptable LOS to deteriorate to an unacceptable LOS, according to the LOS threshold defined by Caltrans.

Freeway Segments: A project is considered to have a significant effect if it would:

- result in a facility operating at an acceptable LOS to deteriorate to an unacceptable LOS, according to the LOS threshold defined in the Caltrans Route Concept Report for that facility.

Residential Streets: A project is considered to have a significant effect if it would:

- result in a residential street operating at an acceptable LOS to deteriorate to an unacceptable LOS; or
- increase the V/C ratio by more than 0.05 at a residential street that is operating at an unacceptable LOS without the project.

When performing a traffic study for new residential developments, the study shall also review the driveway locations and designs, and recommend improvements based on the guidelines described in Table 3.

Table 3
Driveway Design Guidelines for New Streets with Residential Frontage

24-hour Volume	Driveway Design Guidelines
<2,500	No Limitations
2,500-3,500	10-foot additional setback recommended
3,501-4,500	Hammer-head or traffic circle driveway design recommended
>4,500	Driveway access is not recommended

Source: County of Sacramento

Bicycle and Pedestrian Facilities: A project is considered to have a significant effect if it would:

- eliminate or adversely affect an existing bikeway or pedestrian facility in a way that would discourage its use;
- interfere with the implementation of a planned bikeway as shown in the Bicycle Master Plan, or be in conflict with the Pedestrian Master Plan; or
- result in unsafe conditions for bicyclists or pedestrians, including unsafe bicycle/pedestrian, bicycle/motor vehicle, or pedestrian/motor vehicle conflict.

Safety: A project is considered to have a significant effect if it would:

- substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

H. Mitigation Measures

For each significant project impact identified in the traffic study, the study must discuss feasible measures to avoid or substantially reduce the project's significant environmental effect. To be considered adequate, mitigation measures should be specific, feasible actions that will actually improve adverse conditions. Mitigation measures should be measurable to allow monitoring of their implementation. The traffic study should also discuss whether the measure reduces the impact to a less-than-significant level, and should report the conditions after the implementation of the mitigation measure. The report should also identify responsibility for implementation of each measure.

In general, the guidelines below can be used in discussing recommendations/mitigation measures, and identifying responsibility for implementation of each measure:

Existing Condition: Existing deficiencies should be identified. Recommendations, not mitigation measures, should be identified for facilities that do not meet the established thresholds.

Existing Plus Project: If a project causes a facility to operate at an unacceptable level of service, then a mitigation measure should be identified for which the project would be 100 percent responsible. If a project causes a significant impact to a facility operating at an unacceptable level of service, then a mitigation measure should be identified for which the project should pay a "fair share." The project's fair share will be defined as its percentage of the facilities total traffic. The traffic study should determine the project's fair share of the mitigation measure.

Cumulative: Deficiencies should be identified. Recommendations, not mitigation measures, should be identified for facilities that do not meet the established thresholds.

Cumulative Plus Project: If a project causes a significant impact to a facility, then a mitigation measure should be identified for which the project should pay a "fair share". The project's fair share will be defined as its percentage of the facilities total cumulative traffic. The traffic study should determine the project's fair share of the mitigation measure.

I. Reports

One copy of the traffic impact study should be submitted to the Department of Transportation for review and comments. Technical calculations should be included in an attached or separate appendix, and should be submitted to the Department with the traffic study. The name, phone number, and address of a contact person who can respond to the Department's questions should be provided for each traffic study. The cover page of the traffic study is required to be stamped and signed by a Professional Engineer (Traffic or Civil).

Attachment 1

Department of Community Development
Lori A. Moss, Director

Divisions
Building Permits & Inspection
Code Enforcement
County Engineering
Planning & Environmental Review

March 22, 2013

Wilton Rancheria
9300 W. Stockton Boulevard, Suite 200
Elk Grove, CA 95758
Attn: Andrew Franklin, Chairman

Subject: Notice of Application of Wilton Rancheria Land into Trust

On February 22, 2013, the County received a copy of your letter dated February 19, 2013 notifying the County of the Rancheria's intent to apply to the Bureau of Indian Affairs to have land located within Sacramento County taken into trust. Pursuant to the Memorandum of Understanding (MOU) between Sacramento County, the City of Elk Grove, and Wilton Rancheria, we are responding to your letter.

The site is located in the unincorporated portion of Sacramento County, based on the Assessor Parcel Numbers (APN's) provided in the legal description accompanying your letter. The General Plan designations for this site are Agricultural Cropland and Natural Preserve. The Agricultural Cropland designation is for those areas most suitable for intensive agriculture, and the Natural Preserve designation is for those areas that may contain critical natural habitat for priority resource protection. In addition, this area is outside the Urban Services Boundary, the ultimate boundary of the urban area in the unincorporated County. Because of these designations, a commercial enterprise such as a casino and associated services are not consistent with the General Plan. Therefore, pursuant to the MOU, the Tribe must prepare the Tribal Project Environmental Document, as described in the MOU. Note that the Assessor's Office has since revised the APN's listed in the legal description. The APN's are now 148-0010-059 and 060 (formerly 148-0010-013 and 055, respectively).

Please note that we have consented to act as a cooperating agency in the National Environmental Policy Act (NEPA) process for the Wilton Rancheria project, as noted in the attached letter to the Bureau of Indian Affairs. Catherine Hack, Environmental Coordinator, will serve as primary County contact in this regard. She can be reached at (916) 874-7183 or hackc@saccounty.net.

If you have any questions, or need anything further, please feel free to contact me at (916) 874-5584.

Sincerely,

Leighann Moffitt

Leighann Moffitt
Planning Director

Attachment

cc: Bradley Hudson, County Executive
John Whisenhunt, County Counsel
Laura Gill, City Manager, City of Elk Grove
Jonathan P. Hobbs, City Attorney, City of Elk Grove
Jason Behrmann, City Manager, City of Galt
Steven P. Rudolph, City Attorney, City of Galt
Rose Weckenmann, Tribal Attorney, Wilton Rancheria
Lori Moss, Director, Community Development Department
Catherine Hack, Environmental Coordinator
Krista Whitman, Supervising Deputy County Counsel
Cindy Storelli, Principal Planner

Department of
Community Development
Lori A. Moss, Director

COUNTY OF SACRAMENTO
CALIFORNIA

Divisions
Building Permits & Inspection
Code Enforcement
County Engineering
Planning & Environmental Review

March 15, 2013

Amy L. Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

RE: NEPA Cooperating Agency Invitation – Wilton Rancheria Fee-to-Trust and Casino Project EIS

Dear Ms. Dutschke:

We received your correspondence dated February 25, 2013 requesting our participation as a cooperating agency in the NEPA process for the Wilton Rancheria project. We consent to the request and will act as cooperating agency on the subject project. Catherine Hack, Environmental Coordinator, will serve as primary County contact in this regard. She can be reached at (916) 874-7183 or hackc@saccounty.net.

Thank you for including us in this effort. We look forward to working with you.

Sincerely,

Leighann Moffitt

Leighann Moffitt
Planning Director

827 7th Street, Room 220, Sacramento, CA 95814 • Phone (916) 874-7914 • Fax (916) 874-8343 •
www.saccounty.net
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