

Errata Sheet

Wilton Rancheria Fee-to-Trust and Casino Project EIS Scoping Report

February 24, 2014

Two additional scoping letters were received during the 30-day public scoping comment period that concluded on January 6, 2014. These letters are attached and summarized below, and are hereby incorporated into the Scoping Report. The comments made in these letters will be addressed to the extent applicable in the Draft EIS.

The following is a list of environmental issues raised in the letters from the City of Galt and Tim Raboy that are requested to be addressed in the EIS.

- City of Galt requested to be consulted on the scope of traffic impact analysis.
- Direct and cumulative traffic impacts and identification of potential off-site intersection improvements, including potential implementation schedule.
- Project related impacts to land use (farmland/open space), water resources, noise, air quality, visual impacts, biological resources, and City of Galt public services and utilities.
- Potential impacts to existing and future commercial development in the City of Galt from the development of commercial development associated with the fee-to-trust property.
- Effects of the casino on criminal activity in nearby neighborhoods and commercial areas.
- Negative criminal and social impacts and increased associated costs to the surrounding communities from the casino, including increases in crime, driving under the influence, problem gambling, divorce, poverty, and substance abuse.
- Overuse of groundwater resources and the potential impact to existing users.
- Impacts to the City sewer plant and CA Corrections academy.
- Growth inducing potential along Highway 99 between the City of Galt and the City of Elk Grove.
- Negative effects on the Nature Conservancy, Habitat Plan, and SACOG Blueprint.

These issues will be addressed in the EIS to the extent required by NEPA and the Memorandum of Understanding between the Tribe, County of Sacramento, and City of Elk Grove.

NOI Comments Wilton Rancheria Project

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

2013 JAN -2

PACIFIC REGIONAL
OFFICE

Reg Dir	<u>P</u> ✓
✓ Dep Reg Dir	<u>T</u>
Reg Adm Ofcr	
✓ Route	<u>DECRms</u>
Response Required	<u>YES</u>
Due Date	<u>1-10-14</u>
Name	Ltr <u>✓</u>
Tele	Other

December 31, 2013

Dear Ms. Dutschke

I am writing this letter in reference to the proposed casino, hotel and tribe's headquarters which would be built on 282 acres located next to the City of Galt.

This proposed project would be located on land that the previous Galt City Council worked for over ten years to preserve as a permanent farmland greenbelt between Galt and Elk Grove. I worked more than ten years as a citizen and as an elected council member trying to make this permanent farmland greenbelt a reality. This massive land grab is the worst project that has been proposed on this land in the last 50 years.

I am extremely tired of seeing Indian tribes acquire land and build casinos far from their so called "tribal lands". It is all about money, and this proposal is no exception. I can't think of another Indian Casino land grab in California that is as large as this project. Of course the project proponents will say this is of the utmost importance for the tribal members. They will say that the casino will bring them health care, housing, education, and cultural programs, but I know what will really happen. All this project will bring is hundreds of millions of dollars to the tribal members and many negative impacts to the residents of Galt.

The negative impacts of this project are:

- Destruction of a permanent farmland greenbelt between Galt and Elk Grove;
- Destruction of 282 acres of farmland and open space in the Galt area;
- Destruction of 282 acres of Swainson Hawk habitat in the Galt area;

- Overuse of scarce ground water resources that is currently being used by the residents of Galt and the surrounding area;
- Air quality pollution due to the increased traffic visiting the proposed facility;
- Increased noise from the proposed facility affecting the remaining habitat in the area;
- Inappropriate land use patterns would be created from this project, leapfrog development;
- Massive traffic congestion affecting the Twin Cities roadway and the North area of Galt; traffic on Twin Cities is already a mess, and it will only get worse with the Walmart being built;
- Twin Cities overpass cannot handle this traffic. New overpass would have to be built, cost approximately \$30 to \$50 million;
- Transportation corridors near and around this project would be overwhelmed. All connecting streets would become impassible;
- Public health and safety would be compromised. Galt would experience increased crime throughout the city;
- Project would create massive burden on our city sewer plant. Plant was recently upgraded and all the residents of Galt are currently paying for this upgrade;
- Project would create undue burden on the State of California Corrections academy currently located near this proposed project;
- Project would create a need for massive public services for residents and non-residents that would become homeless due to gambling addictions;
- Project would create a subset of society with socioeconomic needs due to this project;
- Project would be visually unappealing compared to the current farmland greenbelt;
- Project would create a massive growth inducing potential to develop the entire farmland area between Galt and Elk Grove on both sides of Highway 99. Similar to what has occurred in the Los Angeles area;
- Project would have a permanent negative affect on the Nature Conservancy and its decades long plan to continually preserve land in Southern Sacramento County;
- Project would destroy the Habitat Plan developed by Sacramento County and surrounding communities;
- Project would have negative consequences on the SACOG Blueprint.

Additional negative impacts are discussed in the following article from Forbes magazine dated September 25, 2013 titled "As Native American Casinos Proliferate, The Social Costs of The Gambling Boom Are Ignored". Kindly address all the negative impacts discussed in the article in your EIS. See attached article. **Some of the negative impacts discussed in the article are:** casinos are crime magnets with two types of illegal activity. Internal corruption that includes money laundering, loan sharking and mob influence, and street crime. It is the increase in crime directly spilling from casino doors that has the most immediate effect on surrounding communities. For nearby neighborhoods, these include DUI-related accidents, home robberies and mail theft. If a precedent is set that Indian casinos are no longer restricted to reservation lands, negatives will impact neighboring areas like never before. According to a 2012 study of casino crime by University of Maryland researchers, there is a 10 percent increase in substance abuse, suicide, violent crime, theft and bankruptcy when a new casino opens in town. Other studies found 8 - 9 percent crime increases at a cost near \$70 per year for every person living nearby. Debt is a damaging and destructive influence in society, and the main reason for divorce. Divorce is a main cause of poverty, depression and youth crime. National data demonstrates that debt increases alongside new casinos. According to the U.S. Department of Justice, casinos attract "pathological gamblers" who account for 50% of casino revenue and much of the crime. An Indian nation singularly focused on the staggering increase in tribal revenue provided by casinos will continue to ignore social costs, as it is in its reasonable self-interest to do so. However, citizens in impacted communities should not choose violence and crime over morals, integrity and the cost of illegal activity.

If you have any questions, I can be reached at 916-494-4908.

Sincerely

A handwritten signature in black ink, appearing to read 'Tim Raboy', with a long horizontal flourish extending to the right.

Tim Raboy

Forbes



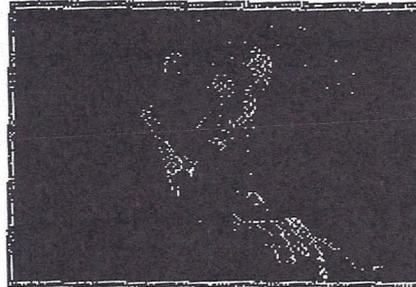
Capital Flows, Contributor
Select commentary curated by the Opinions editors

OP/ED | 9/25/2013 @ 9:00AM | 1,896 views

As Native American Casinos Proliferate, The Social Costs Of The Gambling Boom Are Ignored

By Kerri Toloczko

Indian gaming has been a hot button issue since before the federal Indian Gaming Regulatory Act passed in 1988. Although administration of Tribal casinos by state and federal government is codified in law, it is often a sidebar in the debate as to whether a casino should be approved in a community.



Wisconsin Governor Scott Walker (Photo credit: Wikipedia)

Wisconsin has more than 20 Indian casinos with another request in the pipeline. The tribe presenting the newest application is trying to circumvent long-standing federal regulation requiring tribes to open casinos *only* on reservation lands unless specific criteria are met – including that the casino be a “commutable” distance from the reservation.

The proposed gaming site is 200 miles away from the applicant Menominee Tribe’s doorstep.

Although waivers are rarely given, the tribe has had success with the Obama Administration after it proposed running the new facility using union labor for the first time in Wisconsin gaming history – leaving one to wonder if it will be a tribal casino at all?

The casino also requires approval from the state and Wisconsin’s other tribes, neither of which it has. Governor Scott Walker has applied brakes to this circumvention of federal law by proposing common-sense requirements – not an easy position to take in a state overrun with big gaming money and the lobbying pressure that comes with it.

A prime concern must be the crime and moral decline that often accompanies casinos – especially those associated with unions. In the cost-benefit analysis of casino positives and negatives that accrue to the community affected, social impacts should be a critical determinant.

In many places, sleaze and filth are commonplace around casinos. Las Vegas, our country's largest union-controlled gaming venue, is known as "Sin City." Along with its tourists, pornography, prostitution, drug use and alcoholism walk its sidewalks. Gaming chips away at the innocence and morals of society and is antithesis to the notion that fiscal responsibility and embracing a clean, healthy environment are good national characteristics.

Casinos are crime magnets with two types of illegal activity: Internal corruption that includes money laundering, loan sharking and mob influence, and street crime. It is the increase in crime directly spilling from casino doors that has the most immediate affect on surrounding communities. For nearby neighborhoods, these include DUI-related accidents, home robberies and mail theft. If a precedent is set that Indian casinos are no longer restricted to reservation lands, negatives will impact neighboring areas like never before.

According to a 2012 study of casino crime by University of Maryland researchers, there is a 10 percent increase in substance abuse, suicide, violent crime, theft and bankruptcy when a new casino opens in town. Other studies found 8 - 9 percent crime increases at a cost near \$70 per year for every person living nearby. After Atlantic City's rapid casino growth in the 1980s, crime increased by 100 percent in a 30 mile radius surrounding the area.

When casinos started booming in Wisconsin, the Wisconsin Policy Research Institute commissioned a three-part study of casino related crime in the Badger State that produced frightening results. The expert panel (an economist, a statistician and an expert in gaming administration) found, "existence of a casino within the boundaries of a county led to an increase in county-wide crime rates (and) a strong spillover effect with counties adjacent experiencing higher crime rates." Their data showed a 5,300 annual increase of "major crimes" and 17,100 "minor crimes" with an associated cost in 2001 dollars of \$51 million for Wisconsin taxpayers.

Debt is a damaging and destructive influence in society, and the main reason for divorce. Divorce is a main cause of poverty, depression and youth crime. National data demonstrates that debt increases alongside new casinos. According to the U.S. Department of Justice, casinos attract "pathological gamblers" who account for 50% of casino revenue and much of the crime.

An Indian nation singularly focused on the staggering increase in tribal revenue provided by casinos will continue to ignore social costs, as it is in its reasonable self-interest to do so. However, citizens in impacted communities should not choose violence and crime over morals, integrity and the cost of illegal activity. If a non-reservation casino is built, problems will not affect "someone else" - it will have an immediate, negative effect on Wisconsin society and the wallets of its workers.

Nationwide in 2008, about 80 percent of both Tribal and union contributions (more than \$500 million) went to the Obama campaign and Democrats - a strategy paying off at the expense of Wisconsin communities. As Scott Walker takes a stand against integration of crime into neighborhoods he has sworn to protect, regardless of their political views, Wisconsinites would be wise to join their Governor on this issue, making it clear to the government in Washington and special interests in their state that they stand for safe communities - and themselves.

Kerri Toloczko is a Senior Fellow with Let Freedom Ring, a public policy organization supporting constitutional government, economic freedom and traditional values.

This article is available online at:
<http://www.forbes.com/sites/realspin/2013/09/25/as-native-american-casinos-proliferate-the-social-costs-of-the-gambling-boom-are-ignored/>



Office of the City Manager

January 2, 2014

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

From:
Jason Behrmann
Galt City Manager
380 Civic Drive
Galt, CA 95632

Re: NOI COMMENTS, WILTON RANCHERIA PROJECT

Dear Ms. Dutschke:

Thank you for the opportunity to comment on the Notice of Intent (NOI) for the Wilton Rancheria Project Environmental Impact Statement (EIS). The City is excited that the Wilton Rancheria Tribe has selected a site near the City of Galt and within the City's Sphere of Influence. While the City is generally supportive and enthusiastic about the project, we do have concerns about the impact that the project may have. We respectfully request the following areas be studied as part of the EIS.

1. Traffic: The City requests that the Wilton Rancheria Project EIS traffic study include the following:
 - a. The City requests early consultation with the EIS traffic consultant. We would like to evaluate the proposed land use within the project area (including square feet of each land use) and the trip generation for the proposed project. This will allow us to determine which intersections/segments should be evaluated in the traffic impact study.
 - b. The traffic study should evaluate, at a minimum, the open to the public date and a 20 year horizon. The City would like to work with the Wilton Rancheria Project EIS traffic study consultant to ensure that an appropriate 20 year land use is assumed. Please note that there is an upcoming annexation to the City. The Eastview Project, consists of an annexation area of 500± acres east of Marengo Road / South of Twin Cities Road. The Eastview Project will be starting its traffic study in the near future. It is important that the Wilton Rancheria Project and Eastview Project assume a similar 20 year growth pattern.
 - c. The City has a traffic model to evaluate future year scenarios. This model was developed and is run by the City traffic consultant Omni-Means. The City would like the Wilton Rancheria Project's traffic consultant to work with Omni-Means to ensure consistencies.

- d. The Sacramento Area Council of Governments (SACOG) is currently updating its Master Transportation Plan/Sustainable Communities Plan (MTP/SCS). The City recently submitted to SACOG the estimated open to the public date for the Mingo interchange as 2027 and the Twin Cities (new) interchange as 2033. If either interchange is anticipating to be open to the public in less than 10 years, there is a need to discuss the best date to be included in the MTP/SCS, as to avoid air quality conformity issue and ultimately a potential lawsuit. Please note that there is a limited time period for the City to changes these dates.
2. Utilities: The EIS should study the impact of the project on water distribution, water production, wastewater treatment capacity, wastewater collection, and storm drainage systems. In addition, the EIS should look at wetlands (waters of the US and State- CA), floodplains, stormwater quality treatment, low impact development mitigation for storm drainage runoff and quality, and hydromodification management plan for fluvial geomorphic impacts. These should be looked at in the following areas of the EIS: water resources; biological resources; and public services and utilities.
3. Economic: It is our understanding that the initial project will contain the casino, lodging, restaurants, and other smaller supporting commercial activity. However, the site is large enough to support additional commercial development. The City is concerned that the project could have the potential to siphon commercial activity and revenue away from the City which could spur urban decay and limit future commercial growth within City limits. As such, the City would like the EIS to include an economic impact study to determine the extent to which the project might impact existing restaurants, retailers and shopping centers within the City limits as well as anticipated future commercial growth areas in the City.
4. Public Safety: The City requests that the EIS analyze the project's impact on public safety. While the City has confidence that the casino operators can adequately address criminal activity in the casino grounds, the City is concerned about the potential increase of criminal activity outside the casino area. As mentioned previously, the City is overall supportive of the project. However, we feel that the EIS should study the effect of the casino on criminal activity on nearby neighborhoods and commercial areas. The City would like to ensure residents and business owners that the City has adequate police resources to address any impacts the casino may have.

Thanks again for the opportunity to respond to the EIS. The City appreciates the collaborative approach that the Wilton Tribe has undertaken with the City. We are confident that we can work together to make sure the casino project works for the City and the Tribe.

Sincerely,



Jason Behrmann, City Manager

- c. Marylou Powers, Mayor
Steve Rudolph, City Attorney
Steve Winkler, Public Works
Gwen Owens, Public Works Deputy Director
Chris Erias, Senior Planner