

SUPPLEMENTAL INFORMATION REPORT
**WILTON RANCHERIA FEE-TO-TRUST
AND CASINO PROJECT**

*NEPA REVIEW FOR NATIONAL INDIAN GAMING COMMISSION
REVIEW OF MANAGEMENT CONTRACT*

SEPTEMBER 2018

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1.0 INTRODUCTION

The Wilton Rancheria (Tribe) has requested that the National Indian Gaming Commission (NIGC) approve a Gaming Management Agreement (GMA) between the Tribe and BGM Co. Inc. (BGM), which would allow BGM to manage the Tribe's casino resort on the Tribe's trust property in Elk Grove, California. This Supplemental Information Report (SIR) addresses the recent planned modifications (referred to hereinafter as the 2018 Modified Project) to the 2017 Approved Project. The 2017 Approved Project has been fully analyzed and chosen as the Preferred Alternative in the Bureau of Indian Affairs' (BIA's) December 2016 Final Environmental Impact Statement (FEIS) (BIA, 2016) and approved in the BIA's January 19, 2017 Record of Decision (ROD) (BIA, 2017b).

This SIR is intended to be used by the NIGC to help determine (1) if the planned modifications to the 2017 Approved Project require the NIGC to prepare a Supplemental Environmental Impact Statement (SEIS) and (2) whether the FEIS is adequate such that NIGC may adopt and recirculate the FEIS in furtherance of the NIGC's environmental review obligations under the National Environmental Policy Act (NEPA) and its implementing regulations for the potential approval of the GMA for the 2018 Modified Project.

DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action, the NIGC Chairman's approval of a GMA between the Tribe and BGM, would allow BGM to, for a period of time, manage the Tribe's proposed gaming facility to be located in Elk Grove, California. The Proposed Action is necessary for a professional management company to manage the gaming facility on behalf of the Tribe as contemplated by the Tribe's 2017 Approved Project.

1.1 BACKGROUND

The Tribe submitted a fee-to-trust application to the BIA in November 2013 requesting that the Department of the Interior (Department) acquire approximately 282 acres of land (Twin Cities site) near Galt, California and allow the Tribe to develop a casino and hotel resort and ancillary uses on the Twin Cities site.

A Notice of Intent (NOI) was published in the *Federal Register* on December 4, 2013 describing the Tribe's initial 2013 Proposed Action of having the Department acquire the 282-acre Twin Cities site in trust for a casino resort project and inviting comments. A NEPA scoping meeting was held in the City of Galt on December 19, 2013, and a scoping report was issued on February 24, 2014. A Draft Environmental Impact Statement (DEIS) was prepared pursuant to NEPA, the Council on Environmental Quality (CEQ) NEPA regulations, and the Department's and BIA's NEPA implementing regulations, under the direction and supervision of the BIA Pacific Regional Office (BIA, 2015). The DEIS was issued on December 29, 2015 and identified several alternative sites for the project, including the Twin Cities site near Galt, California; the Historic Rancheria site, located in the community of Wilton,

California; and the Elk Grove Mall site located within the City of Elk Grove, California. The DEIS comment period included a public hearing on January 29, 2016.

On June 30, 2016, the Tribe withdrew its November 2013 fee-to-trust application and submitted a revised fee-to-trust application, requesting instead of the Twin Cities site that the Secretary of the Interior acquire the Elk Grove Mall site (a 35.92-acre site within the City of Elk Grove; shown in **Figure 1**), which had been evaluated as Alternative F in the DEIS. After consideration and incorporation of comments received on the DEIS and evaluating all alternatives analyzed in the DEIS, the BIA issued the Final EIS (FEIS) on December 16, 2016, identifying Alternative F as its Preferred Alternative.

A BIA ROD for the “Trust Acquisition of 35.92 +/- acres in the City of Elk Grove, California, for the Wilton Rancheria” was issued in January 2017 (BIA, 2017b). The ROD was based in part upon thorough review and consideration of the FEIS. On February 10, 2017, the land was placed into trust (BIA, 2017c).

As stated in Section ES.1 of the FEIS, the casino would be managed by a professional management company on behalf of the Tribe pursuant to the terms of a management agreement to be approved by the NIGC. During the scoping process for the DEIS, BIA invited the NIGC to be a NEPA cooperating agency in a letter dated February 25, 2013 (DEIS, Appendix A); however, no response was received by the BIA. In Section 1.8 of the FEIS, the NIGC is included in Table 1-1 as the agency responsible for approval of Tribal gaming ordinances and approval of the gaming management contract.

Section 2.2.3 of the FEIS explains that the NIGC was established under the Indian Gaming Regulatory Act (IGRA) and is charged with the authority to approve GMA’s between tribal governments and outside management groups, and that to do so, the NIGC must determine that the contract is consistent with IGRA and NIGC’s IGRA implementing regulations in terms of contract period, management company payment, and protection of tribal authority. The NIGC also conducts extensive background checks on the gaming management company’s key personnel and may determine that, under NEPA, an EIS or an Environmental Assessment is required for approval of the GMA. The FEIS prepared by the BIA was intended to provide the environmental analysis and recommended mitigation to allow the NIGC to comply with NEPA without having to prepare a separate environmental document.

Section 2.2.3 of the FEIS also states that the potential management contract between the Tribe and a management company would assist the Tribe in obtaining funding for the development of the 2017 Approved Project, and once the facility becomes operational, the management company would have the exclusive right to manage day-to-day operations of the casino resort facility for a period of time. The Tribe and the gaming management company must comply with the terms of IGRA and the NIGC’s regulatory requirements relating to the operation of the Tribal gaming facility. The Tribal Government would maintain the ultimate authority and responsibility for the development, operation, and management of the casino pursuant to IGRA and NIGC regulations. BIA consulted the NIGC during the preparation of the EIS, as noted in Section 6.3 of the FEIS.

As noted above, this SIR is intended to be used by the NIGC to help determine (1) if the planned modifications to the 2017 Approved Project require the NIGC to prepare a Supplemental Environmental Impact Statement (SEIS) and (2) whether the FEIS is adequate such that NIGC may adopt and recirculate the FEIS in furtherance of the NIGC's environmental review obligations under the National Environmental Policy Act (NEPA) and its implementing regulations for the potential approval of the GMA for the 2018 Modified Project.

1.2 APPLICABLE STANDARDS TO DETERMINE IF A SUPPLEMENTAL EIS IS NEEDED

This SIR evaluates the adequacy of the previous environmental analysis in the FEIS and ROD to address the NEPA compliance requirements of the NIGC in its consideration of the GMA that has been submitted by the Tribe for approval. This SIR specifically analyzes whether there have been substantial changes to the 2017 Approved Project that have occurred since the FEIS was issued in December 2016 and the ROD was issued in January 2017 that would require the preparation of an SEIS. The standard for determining whether an agency must prepare a SEIS is set out in § 1502.9(c)(1) of the CEQ regulations, which states that federal agencies:

Shall prepare supplements to either draft or final environmental impact statements if:

- (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or*
- (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.*

Since the NIGC has not adopted its own regulations to implement NEPA, the CEQ NEPA regulations alone are the applicable regulations governing the NIGC's determination of whether a SEIS is required prior to approval of the GMA.

1.3 APPLICABLE STANDARDS TO DETERMINE IF THE NIGC MAY ADOPT THE FEIS AND RECIRCULATE THE FEIS AS A FINAL STATEMENT

CEQ regulations (40 CFR § 1506.3) provide that the NIGC may adopt the FEIS if the FEIS meets the standards for an adequate FEIS under 40 CFR §§ 1500-1508. In addition, § 1506.3(b) provides that if the actions covered by the FEIS and the proposed action are substantially the same, the NIGC is not required to recirculate the FEIS except as a final statement.

2.0 2017 APPROVED PROJECT AND 2018 MODIFIED PROJECT

The FEIS evaluated the 2017 Approved Project, which included the casino, hotel, and associated uses on the Elk Grove Mall site (FEIS Alternative F). The 2017 ROD also included mitigation for any significant environmental impacts resulting from the 2017 Approved Project by recommending that the Tribe implement the mitigation measures set out in the Mitigation Monitoring and Enforcement Plan (MMEP),

which was Attachment IV to the ROD (copy included as **Attachment A** to this SIR). In the little over one year since the ROD was issued and the Elk Grove Mall site was acquired in trust, minor changes to the casino configuration (2018 Modified Project) have been planned by the Tribe and changes to the physical and regulatory environment may have occurred since the FEIS was completed.

Figure 1, which is from the 2016 FEIS, shows the site plan for the 2017 Approved Project. **Figure 2** shows the site plan for the 2018 Modified Project. **Table 1** below shows the differences between the 2017 Approved Project as described in the FEIS and the 2018 Modified Project. As shown in **Figure 2**, the layout of some of the project components has been slightly modified.

Differences include reorientation of the pool area, square footage increases of the high limits gaming floor, lobby bar, and sports dining restaurant as well as decreases in the square footage of the conference center, poker area, and other restaurants. The increase in the “other services” category includes the garden/patio space that would be enclosed by the addition of a dome/skylight. The hotel has also decreased from 302 to 300 rooms. The overall square footage of the development would increase by 5.95 percent.

The 2018 Modified Project has benefited from more developed designs that have been prepared since the casino and hotel resort project was approved in January 2017. Thus, the 2018 Modified Project contains more detail on the proposed uses and sizes of the project components. For instance, the convention center would not be used 365 days of the year as was conservatively estimated in the FEIS for the 2017 Approved Project; rather, it would be used no more than one to two times per week, or 52 to 104 times per year.

3.0 REVIEW OF ENVIRONMENTAL SETTING & IMPACT ANALYSIS

Section 3.0 of this SIR provides (1) a detailed analysis of any changes to the environmental impacts from the 2018 Modified Project, (2) a description of any changes to the environmental and regulatory setting since the FEIS was issued, and (3) whether these changes may affect the conclusions regarding environmental impacts within the FEIS and the ROD and the recommended mitigation.

3.1 GEOLOGY AND SOILS

As described in Section 3.2.3 of the FEIS, the Elk Grove Mall site, which was already partially developed as a retail mall, has existing parking lots and buildings as well as building pads graded to drain surface water to existing storm drain outlets. The topography of the site is relatively flat and elevations range from approximately 30 to 50 feet. There are no active faults in the vicinity of the Elk Grove Mall site, and no known or recorded mineral resources occur on-site.

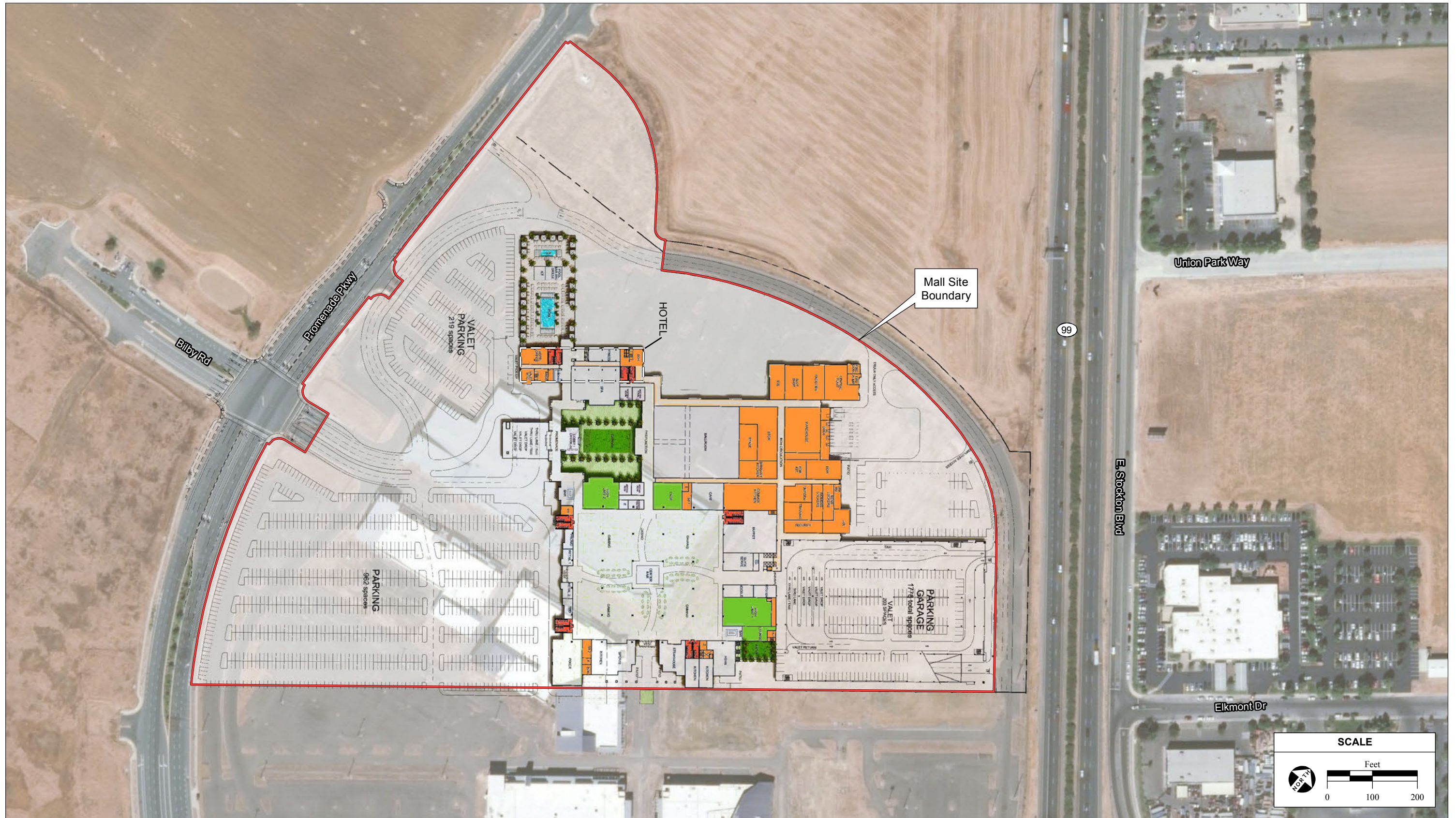


Figure 1
2017 Approved Project



Figure 2
2018 Modified Project

FINDINGS

No additional impacts beyond those identified in the FEIS would occur from the 2018 Modified Project. Existing Mitigation Measures 1 (A) – (C) in the MMEP include: obtaining a U.S. Environmental Protection Agency (USEPA) National Pollutant Discharge Elimination System (NPDES) Construction General permit if construction will disturb one acre or more, which would include Best Management Practices (BMPs); incorporating the BMPs into a stormwater pollution prevention plan (SWPPP); training contractors to prevent environmental damage from soil erosion and sediment runoff; and training contractors to handle and properly dispose of chemicals used during construction. Therefore, with the implementation of the mitigation recommended in the MMEP, impacts to geology and soils would remain less than significant, as described in Section 4.2.6 of the FEIS. No additional mitigation is warranted.

3.2 WATER RESOURCES

As described in Section 3.3.3 of the FEIS, the Elk Grove Mall site is located within the Lower Sacramento River Hydrological Region and the site drains toward existing storm drain inlets. The Elk Grove Mall site is located outside the 100-year and 500-year flood zones. There are no waterbodies within the vicinity of the Elk Grove Mall site listed on the State impaired waterbody 303(d) list. The Elk Grove Mall site is within the South American Subbasin of the Sacramento Valley Groundwater Basin.

FINDINGS

The 2018 Modified Project will create no additional impacts to water resources beyond those identified in the FEIS, and none of those impacts is significant, as described in Section 4.3.6 of the FEIS. Therefore, as shown in Section 5.3 of the FEIS and in the MMEP, no mitigation for water resources is recommended.

3.3 AIR QUALITY AND CLIMATE CHANGE

Since the publication of the FEIS, the California Air Resources Board (CARB) has prepared the 2017 Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Further Reasonable Progress Plan (CARB, 2017). This plan was presented at a public hearing in November 2017, but it has not yet been incorporated into the State Implementation Plan (SIP). No other changes to the regulatory or environmental air quality setting have occurred since the publication of the FEIS in December 2016.

A final conformity determination (FCD) for the project was completed and issued for the 2017 Approved Project in January 2017 (BIA, 2017a). The FCD concluded that the preferential parking for vanpool and carpools and the purchase of 53.75 tons of nitrogen oxides (NO_x) emissions reduction credits (ERCs) prior to the operation of the 2017 Approved Project would be sufficient to offset the operational effects of NO_x emissions in accordance with the SIP for the Sacramento Valley Air Basin (SVAB) and general conformity requirements.

TABLE 1
COMPARISON OF PROJECT PROGRAMS

Area	2017 Approved Project		2018 Modified Project		Change		
	Seats/Rooms/ Parking Spaces	Approximate Square Footage	Seats/Rooms/ Parking Spaces	Approximate Square Footage	Seats/Rooms/ Parking Spaces	Approximate Square Footage	Percent Change
Casino							
Main Floor	66 tables/1,900 slots	96,360	66 tables/1,900 slots	96,162		-198	-0.21%
High Limits	14 tables/100 slots	7,100	14 tables/100 slots	14,903		7,803	109.90%
Poker	24 tables	6,800	12 tables	2,431		-4,369	-64.25%
Front of House Services							
Retail		1,870		2,338		468	25.03%
Fitness		2,120		1,728		-392	-18.49%
Spa		8,683		8,970		287	3.31%
Other services (Front Desk, Sundries, Circulation, Garden/Patio Salon etc.)		19,637		26,722		7,085	36.08%
Restaurants							
Buffet/Food Hall	360 seats	9,730	357 seats	12,880	75 seats	3,150	32.37%
Café	150 seats	4,260	192 seats	4,622	50 seats	362	8.50%
Other Restaurants	310 seats	10,054	300 seats	6,188	-10 seats	-3,866	-38.45%
Center Bar/Lounge	70 seats	2,000	114 seats	2,190		190	9.50%
Sports Dining/Wharf	125 seats	4,138	284 seats	7,136	233 seats	2,998	72.45%
Lobby Bar/Vineyard Bar	40 seats	1,642	64 seats	2,676	11 seats	1,034	62.97%
Pool Bar/Grill	60 seats	1,150	60 seats	432		-718	-62.43%
Steakhouse	150 seats	3,900	148 seats	4,740		840	21.54%
Convention Center		47,634		32,644		-14,990	-31.47%
Casino Support (Casino Restrooms, Lounges, Cages, etc.)		18,193		30,046		11,853	+65.15%
Hotel							
Standard/Suites	302 rooms	225,280	300 rooms	225,280	-2 rooms	0	0.00%
On-Site Parking¹							
Parking Garage (including Valet)	1,966 spaces		1,729 spaces		-265 spaces		-13.48%

Area	2017 Approved Project		2018 Modified Project		Change		
	Seats/Rooms/ Parking Spaces	Approximate Square Footage	Seats/Rooms/ Parking Spaces	Approximate Square Footage	Seats/Rooms/ Parking Spaces	Approximate Square Footage	Percent Change
Surface Parking	1,437 spaces		1,445 spaces		-53 spaces		-5.08%
Employee	130 spaces		124 spaces		0 spaces		0.00%
<i>Total Parking Spaces Provided</i>	3,533 spaces		3,298 spaces		-235 spaces		-6.65%
Back of House²		138,475		162,908		24,703	17.87%
Total Square Footage³		608,756		644,996		36,240	5.95%

Source: Klai Juba Wald Architects, 2016; Klai Juba Wald Architects, July 2018

Notes:
1 - Total back of house (BOH) square feet does not include 36,080 square foot (sf) hotel BOH and 2,000 sf spa BOH, which are included in their respective categories. BOH includes facilities such as hotel bag storage, employee support services, facilities and maintenance, warehouse and storage, and back kitchen areas.
2 - Line items may not precisely add to total due to rounding up.

Based on revisions made to the 2018 Modified Project, a new California Emissions Estimator Model (CalEEMod) Version 2016.3.2 air quality model run was performed as part of the new conformity analysis presented in this SIR. CalEEMod Version 2016.3.2 is the most current approved air quality model from CARB and the USEPA and uses the most current emissions factors provided by the 2014 Emissions Factor database (EMFAC2014).¹ The previous air quality model used for the FEIS and the FCD for the 2017 Approved Project was CalEEMod Version 2013.2.2, which incorporated the then most current emission factors from EMFAC2014. It should be noted that the newer 2016.3.2 version of CalEEMod requires inputs for emissions from on-site energy use and stationary sources, and inclusion of these additional onsite emission sources in the modeling could result in higher overall project-related emissions.

An overall increase in size of 36,240 square feet of additional operating space would occur with implementation of the 2018 Modified Project. To account for the increase in operating space, an additional 36,240 square feet was added to the User Defined land use input for the CalEEMod air quality model. The trip generation rate used to determine mobile emissions related to the 2018 Modified Project is based more on the square footage of gaming areas rather than on the number of gaming positions. Because the number of slots and tables in the Main Floor of the casino did not change in the 2018 Modified Project from the number of slots and tables used in the DEIS/FEIS and ROD for the 2017 Approved Project, no change to the trip generation rate was needed for the new modeling for the 2018 Modified Project². Trips to and from the 2018 Modified Project's convention center would be reduced because of the changes in the square footage in the smaller convention center (refer to Section 3.7), resulting in a slight decrease in mobile emissions associated with the smaller convention center. Further, a 30 percent reduction in the trip generation rate (from 365 to 256 days per year that the convention center will be booked) was used to account for the Tribe's greater understanding that the convention center will not be used on a daily basis. In fact, as stated in **Section 2.0**, the convention center is only expected to be used between 52 and 104 days per year. Thus, using 265 days per year in calculating the trip generation rate for the convention center is still very conservative.

The 2018 Modified Project would consist of two fewer hotel rooms; however, the total size of the hotel would not change. Therefore, only mobile emissions (and not emissions from heating and cooling) would be reduced due to the slight reduction in trips as a result of the two-room decrease in hotel rooms. In addition, there was expected to be a slight increase in air emissions related to heating and cooling the approximately 6 percent larger total square footage of the 2018 Modified Project.

¹ EMFAC2014 was approved by USEPA for conformity analyses and determinations that began on or after December 14, 2105 (80 Fed. Reg. 77337-77340 [Dec. 14, 2015]). EMFAC2017 has been approved by CARB, but because EMFAC2017 has not yet been approved by USEPA, it could not be used for this conformity analysis of the 2018 Modified Project (CARB, 2018a and CARB, 2018b).

² The only change in the gaming positions from the 2017 Approved Project to the 2018 Modified Project is that the number of poker tables, which each have seats for up to ten patrons, is reduced from 24 poker tables to 12 poker tables. This minor change was not used to determine the trip generation rate for the 2018 Modified Project, but if it had it been used, it could have only lowered and not raised the trip generation rate for the 2018 Modified Project.

As shown in **Table 2**, all criteria pollutants and GHG emissions would decrease during the approximately 18-month construction period for the 2018 Modified Project.

FINDINGS

Table 2 below shows mitigated criteria pollutant and greenhouse gas (GHG) emissions from construction of the 2017 Approved Project with their counterpart emissions from the construction of the 2018 As shown in **Table 3** below and in **Attachment B**, all *criteria* pollutant emissions from the operation of the 2018 Modified Project are less than those estimated for the 2017 Approved Project. However, **Table 3** shows that the mitigated *non-criteria* GHG emissions from the operation of the 2018 Modified Project will be 81 MT greater than from the operation of the 2017 Approved Project.

TABLE 2
CONSTRUCTION EMISSIONS COMPARISON

Construction Year	Mitigated ¹ Criteria Pollutants						Mitigated ¹ GHG
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}	
	tons per year						MT per year ²
Max. Yr. Emissions under the 2017 Approved Project ³	5.24	15.33	21.85	0.04	2.49	1.10	3,566
Max. Yr. Emissions under the 2018 Modified Project ⁴	3.92	11.89	13.93	0.03	1.65	0.80	3,028
Increase/Decrease Compared to 2017 Approved Project	Decrease	Decrease	Decrease	Decrease	Decrease	Decrease	Decrease

1 - "Mitigated" means the incorporation of Mitigation Measures 2(C) and 2(D) in the MMEP with the exception of the NO_x ERC purchases recommended in Mitigation Measure 2(D) and in this Section 3.3 of this SIR.
2 - MT = Metric Tons
3 - Source: BIA. 2016 (FEIS: Revised Appendix S – March 2016 Revised Air Quality Modeling Output Files and Calculation Tables – CalEEMod 2013.3.2, p. 9 of 40).
4 - Source: Attachment B to this SIR (March 2018 Air Quality Modeling Output Files and Calculation Tables (CalEEMod 2016.3.2), p. 9 of 47).

TABLE 3
OPERATIONAL EMISSIONS COMPARISON

Total Emissions	Mitigated ¹ Criteria Pollutants						Mitigated ¹ GHG
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}	
	tons per year						MT per year
Total Emissions under the 2017 Approved Project ²	15.17	52.99	215.54	0.89	49.62	13.88	52,712
Total Revised Emissions under the 2018 Modified Project ³	11.83	51.99	161.14	0.54	45.68	12.92	52,793
Increase/Decrease Compared to 2017 Approved Project	Decrease	Decrease	Decrease	Decrease	Decrease	Decrease	Increase

1 - "Mitigated" means the incorporation of Mitigation Measures 2(C) and 2(D) in the MMEP with the exception of the NO_x ERC purchases recommended in Mitigation Measure 2(D) and in this Section 3.3 of this SIR.
2 - Source: BIA. 2016 (FEIS: Revised Appendix S – March 2016 Revised Air Quality Modeling Output Files and Calculation Tables – CalEEMod 2013.3.2), p. 11 of 40.
3 - Source: Attachment B to this SIR – (March 2018 Air Quality Modeling Output Files and Calculation Tables (CalEEMod 2016.3.2), p. 11 of 47).

The Tribe has agreed to purchase 81 MT of GHG ERCs prior to the operation of the 2018 Modified Project to fully offset the 81 MT increase in GHG emissions from the operation of the 2018 Modified Project (Wilton Rancheria Tribal Council Resolution No. 2018-26)(**Attachment C**).

In conclusion, with the implementation of the 2018 Modified Project, there would be a net decrease in impacts to air quality over those impacts analyzed for the 2017 Approved Project for all criteria pollutants. Because the conformity analysis in this SIR for the emission of criteria pollutants from the 2018 Modified Project (the results of which are shown in **Table 2** above and **Table 3** above) has concluded that the modeled net construction and operational emissions of criteria pollutants from the 2018 Modified Project will be less than their counterpart emissions from the 2017 Approved Project, the conformity analysis in this SIR is complete, and there is no need to conduct a new conformity determination for the 2018 Modified Project or to modify Mitigation Measures 2(A) – 2(D) in the MMEP to address emissions of criteria pollutants. In addition, as discussed above, the Tribe has agreed to purchase an additional approximately 81 MT of GHG ERCs to offset the 0.15 percent increase in mitigated GHG emissions from the operation of the 2018 Modified Project as compared to the mitigated operational GHG emissions from the 2017 Approved Project.

3.4 BIOLOGICAL RESOURCES

No changes have been made to the regulatory environment or regional setting for biological resources within the Elk Grove Mall site since the FEIS was issued. Based on a site visit on March 22, 2018, the only habitat type occurring on the Elk Grove Mall site remains ruderal/developed (refer to Section 3.5.4 of the FEIS); neither waters of the U.S. nor habitat for special-status species is located on-site.

The FEIS found that no federally-listed endangered, threatened, candidate species, or state-listed species occur on the Elk Grove Mall site. Refer to Section 3.5.4 of the FEIS. These conclusions, which were confirmed during the March 22, 2018 site visit, remain accurate.

As discussed in Section 4.5.6 of the FEIS, construction activities and increased lighting compared to current conditions have the potential to impact migratory birds. As part of the 2018 Modified Project, a garden/patio area will be covered by an approximately 16,000 square foot tinted glass dome/skylight. The dome/skylight will extend as much as 12 feet above the top of the convention center for a total height of approximately 59 feet above grade. By comparison, the hotel will be approximately 152 feet tall. As required by Mitigation Measure 10 (E) of the MMEP, “all exterior glass shall be non-reflective low-glare glass.” Under the 2018 Modified Project, all exterior glass in the dome/skylight, as well as the hotel tower, will be consistent with Mitigation Measure 10 (E). Lights within the garden/patio area that will be covered by the dome/skylight will have top and side shades and be directed downward so as not to interfere with migrating birds, consistent with Mitigation Measure 3 (C) of the MMEP. Given the relatively low additional height of the new dome/skylight, the low reflective nature of the glass units that will be used for it, and the downward direction and top and side shading of the interior lights within the

garden/patio area, no significant new impacts to migratory birds would occur associated with construction or operation of the 2018 Modified Project. Existing Mitigation Measures 3 (A) – (C) in the MMEP, which include reducing the use of exterior and interior lights during midnight to dawn hours during peak migration periods conducting a preconstruction survey of nesting migratory birds and raptors and not disturbing such nests without permits, as well as implementing Mitigation Measure 10(E) which specifies that all exterior glass be non-reflective and low-glare glass would reduce impacts to migratory birds.

FINDINGS

No additional impacts to biological resources beyond those to migratory birds identified within Section 4.5.6 of the FEIS and mitigated by measures in the MMEP would occur.

3.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

ENVIRONMENTAL SETTING

As stated in Section 3.6 of the FEIS, no known cultural or paleontological resources occur on the Elk Grove Mall site or within a half-mile of the site.

FINDINGS

The 2018 Modified Project will create no additional impacts to cultural and paleontological resources beyond those identified within the FEIS. Therefore, with the implementation of Mitigation Measures 4 (A) – (D) in the MMEP, which include procedures for reporting and preserving any inadvertently discovered prehistoric or historic archeological resources, paleontological resources, or human remains during ground-clearing and construction activities, adverse impacts to unknown cultural or paleontological resources would remain less than significant, as described in Section 4.6.6 of the FEIS.

3.6 SOCIOECONOMIC CONDITIONS AND ENVIRONMENTAL JUSTICE

Information in Section 3.7.2 of the FEIS compares population, housing, and employment data for Sacramento County and the City of Elk Grove. Most of this data is current (i.e., within the last five years); however, the housing data provided in Table 3.7-3 of the FEIS is from 2010. See Table 4 below.

TABLE 4
2010 REGIONAL HOUSING STOCK

Location	Total Units	Vacant Units	Vacancy Rate
City of Elk Grove	50,634	2,684	5.3%
Sacramento County	555,932	42,251	7.6%

Source: FEIS. Table 3.7.3; Appendix N (Socioeconomic Analysis for the City of Galt, City of Elk Grove and Sacramento County); U.S. Census, 2010.

More recent housing data is presented in **Table 5** below.

TABLE 5
2016 REGIONAL HOUSING STOCK

Location	Total Units	Vacant Units	Vacancy Rate
City of Elk Grove	52,403	1,830	3.5%
Sacramento County	562,003	34,668	6.2%
Source: U.S. Census, 2016.			

Changes from the 2017 Approved Project analyzed in the FEIS to the 2018 Modified Project are minor and would have a negligible impact on projected socioeconomic and environmental justice effects described in Section 4.7.6 of the FEIS and shown in **Tables 4** and **5** above, as the number of gaming machines and the number of workers employed during construction and operation of the casino and hotel resort, which would generate most of the economic effects, would remain the same.

While housing vacancy rates have declined from 2010 to 2016 (as shown in Table 3.7-3 of the FEIS and by comparing **Table 4** and **Table 5** above), there are still available vacant housing units in Sacramento County (refer to **Table 5** above). Since the 2018 Modified Project would not lead to the need for additional employees (beyond those identified in the FEIS) during construction or operation of the casino and hotel resort, it would not result in a significant need for new housing and impacts to housing would remain less than significant.

Also by directly offering more than 1,558 temporary construction and over 2,000 full-time jobs once the casino opens, some of which will be filled by tribal members and other minority applicants from the Elk Grove and Sacramento County area, the 2018 Modified Project would have a beneficial impact to the minority and low-income communities analyzed for environmental justice impacts in the Section 4.7 of the FEIS.

The changes in the 2018 Modified Project will support the already positive impact from the casino project on Tribal members and other minority or low-income communities in the vicinity of the Elk Grove Mall Site.

FINDINGS

No additional impacts to socioeconomic conditions or environmental justice beyond those identified within the FEIS would occur. Mitigation Measures 5 (A) – (H) recommended in the MMEP include significant payments to the City of Elk Grove in lieu of taxes, other payments to the City and Sacramento County pursuant to the terms of the Tribe’s Memorandum of Understanding (MOU) with each entity, payment to an organization to provide treatment for problem gamblers, display of information about problem gambling and resources for its treatment at all ATM machines, and training employees to identify and direct problem gamblers to available resources. Therefore, with the implementation of these existing mitigation measures, impacts to socioeconomic conditions and environmental justice would remain less than significant, as described in Section 4.7.6 of the FEIS.

3.7 TRANSPORTATION/CIRCULATION

No significant changes to the transportation/circulation setting, including bicycle and pedestrian facilities, have occurred or been planned since the publication of the FEIS.

Trip generating uses of the project include the hotel, gaming floor, and convention center (restaurants and retail, along with other auxiliary/internal uses, are not considered trip generating uses because they are incorporated into the trip generation rate of the casino, which itself is based on empirical data from similar existing casino facilities. See Appendix O (Traffic Impact Study) of the DEIS, which was incorporated into the FEIS. With the 2018 Modified Project, the hotel has two fewer rooms, which would slightly decrease the total number of trips attributed to the hotel in the 2018 Modified Project compared to the 2017 Approved Project. While the square footage of the gaming floor (which was used to forecast trip generation in the FEIS) has increased slightly under the 2018 Modified Project, the number of gaming devices remains the same as was analyzed in the DEIS and FEIS. As discussed above in **Section 3.3**, the trip generation rate for the modified casino component of the 2018 Modified Project is based on more the square footage of the gaming areas and not on the number of gaming devices, with no increase in the number of gaming devices, the casino-related trip generation rate for the 2018 Modified Project would remain the same.

The convention center has decreased by 14,990 square feet under the 2018 Modified Project, which will measure only 32,664 square feet as compared to 47,634 square feet for the 2017 Approved Project (see **Table 1** above). The City of Elk Grove Title 23 Zoning Code provides in Table 23.58-2 that the parking requirement for assembly uses such as the convention center areas is the greater of 1 parking space per 3 fixed seats, or 1 space for 50 square feet of convention center space. Since the convention center will only use non-fixed seats, the associated parking requirement will be 653 spaces. Therefore, with two fewer hotel rooms, the same number of gaming devices, and approximately 32 percent less square footage in the convention center, the 2018 Modified Project was expected to generate the same or slightly less traffic than that analyzed in the FEIS for the 2017 Approved Project.

Assumptions and calculations regarding parking are presented in **Table 6 below**. As shown in **Table 6**, the 2018 Modified Project would provide more than sufficient parking spaces for its proposed uses.

FINDINGS

As discussed above, no significant changes to the transportation setting have occurred and the minor changes to the square footages of the major trip generating uses to the site plan for the 2018 Modified Project would not result in new impacts to the transportation network. In fact, analysis in the FEIS was likely to have been conservative because of the significant decrease in the convention center-related trip-generating uses explained above in **Section 3.3**.

TABLE 6
PARKING ASSESSMENT¹

Area	2018 Modified Project			Required Parking		
	Games/Fixed Seats/Rooms/Parking Spaces	Approximate Square Footage/Seats		Land Use Category	Parking Requirement	Number of Spaces
Casino						
Main Floor	66 tables	96,162	64,000 sf (1,900 slots) / 462 (table seats)	Clark County, Nevada, Title 30 ²	(Slots) 4.2 spaces / 1,000 sf ³	269
				Card Room	(Table Games) 1 space / 2 seats	231
High Limits	14 tables	14,903	3,200 sf (100 slots) / 98 (table seats)	Clark County, Nevada, Title 30 ²	(Slots) 4.2 spaces / 1,000 sf ³	14
				Card Room	(Table Games) 1 space / 2 seats	49
Poker	12 tables	2,431	120 (table seats)	Card Room	(Table Games) 1 space / 2 seats	60
Front of House Services						
Retail		2,338		Retail	4.5 spaces / 1,000 sf	11
Fitness		1,728		Fitness	1 space / 200 sf	9
Spa		8,970		Personal Services	Greater of 1 space/200 sf or 2/chair	45
Other services (Front Desk, Sundries, Circulation, Garden/Patio, Salon etc.)		26,722		Business Support Services	4.5 / 1,000 sf	121
Restaurants						
Buffet/Food Hall	77 fixed seats	12,880		Restaurants	Greater of 1 space / 3 fixed seats or 1 space / 60 sf dining area	215
Café	74 fixed seats	4,622		Restaurants	Greater of 1 space / 3 fixed seats or 1 space / 60 sf dining area	78
Other Restaurants (Noodle/Asian)	0 fixed seats	6,188		Restaurants	Greater of 1 space / 3 fixed seats or 1 space / 60 sf dining area	104
Center Bar/Lounge	33 seats	2,190		Bars and Nightclubs	1 space / 3 fixed seats, plus 1 space / 50 sf assembly area	55
Sports Dining/Wharf	64 fixed seats	7,136		Restaurants	Greater of 1 space / 3 fixed seats or 1 space / 60 sf dining area	119
Lobby Bar/Vineyard Bar	0 fixed seats	2,676		Bars and Nightclubs	1 space / 3 fixed seats, plus 1 space / 50 sf assembly area	54
Pool Bar/Grill	0 fixed seats	432		Restaurants	Greater of 1 space / 3 fixed seats or 1	8

Area	2018 Modified Project		Required Parking		
	Games/Fixed Seats/Rooms/Parking Spaces	Approximate Square Footage/Seats	Land Use Category	Parking Requirement	Number of Spaces
				space / 60 sf dining area	
Steakhouse	32 fixed seats	4,740	Restaurants	Greater of 1 space / 3 fixed seats or 1 space / 60 sf dining area	79
Convention Center	0 fixed seats	32,644	Assembly	Greater of 1/3 fixed seats or 1/50 sf for non-fixed seats	653
Casino Support (Casino Restrooms, Lounges, Cages, etc.)		30,046	Business Support Services	4.5 / 1,000 sf	136
Hotel					
Standard/ Suites	300 rooms	225,280	Hotels and Motels	1 space / room	300
On-Site Parking¹					
Parking Garage (including Valet)	1,729 spaces				
Surface Parking	1,445 spaces				
Employee	124 spaces				
Total Parking Spaces Provided	3,298 spaces				
Back of House⁴					
Administrative Offices		59,324	Office	4.5 / 1,000 sf	267
Warehouse and Storage		13,844	Warehouse and Storage	1 space / 2,000 sf, plus 1 company operated vehicle	8
Utility and Mechanical Areas		59,713	Utility Infrastructure	None Required	0
Kitchen Areas		30,027	Business Support Services	4.5 / 1,000 sf	136
Total Parking	3,298 spaces				3,115

Notes:

- 1 - Source: Klai Juba Wald Architects, July 2018; City of Elk Grove, California Title 23 Zoning Code 2018, unless otherwise indicated.
- 2 - The 2017 Clark County, Nevada Title 30 Development Code - Parking Requirements Table 30.60-1 was utilized for the casino main floor and high limits areas because the Elk Grove, California Zoning Code does not provide parking requirements for such casino land uses.
- 3 - Table games are calculated with 7 seats in Main Casino and High Limit areas and 10 seats in Poker areas.
- 4 - Total back of house (BOH) square feet includes facilities such as hotel bag storage, employee support services, facilities and maintenance, warehouse and storage and back kitchen areas.

As a result, no additional transportation impacts beyond those analyzed in the FEIS for the 2017 Approved Project have been identified and no additional improvements beyond those previously addressed in the FEIS and recommended in the MMEP are needed. Mitigation Measures 6 (A) – (J) and (P) – (Q) recommended in the MMEP include the Tribe’s (1) paying its full or fair share cost of mitigation when transportation infrastructure is shown as having an unacceptable level of service as a result of the addition of traffic associated with the casino project, (2) taking measures to minimize impacts on traffic during construction and operation of the casino project, including paying for full or fair share of improvements of neighboring roads and highways, and instituting alternative transportation options such as shuttle service, and (3) working cooperatively with the City of Elk Grove to expand public transportation to and from the casino. Therefore, with the implementation of these already-established mitigation measures, transportation and circulation would remain less than significant, as described in Section 4.8.7 of the FEIS.

3.8 LAND USE

The Elk Grove Mall site is located within the City of Elk Grove on tribal land held in trust by the federal government, as described in **Section 1.0**. The City zoning and land use designation surrounding Elk Grove Mall site remain unchanged since the FEIS was published in December 2016. The Elk Grove Mall site is mostly paved and no agricultural operations currently take place on-site. The agricultural setting is described in Section 3.9.3 of the FEIS. The designation of the area for urban development and subsequent development both within and outside of the Lent Ranch Special Planning Area (LRSPA) has removed the site from agricultural use.

FINDINGS

The 2018 Modified Project, a commercial development, remains generally consistent with City land use designations. Impacts to land use consistency, compatibility with surrounding land use designations, and agriculture would remain less than significant, as described in Section 4.9.6 of the FEIS and no mitigation measures were recommended in either the FEIS or the MMEP. Since the land use impacts for the 2018 Modified Project are the same as those land use impacts from the 2017 Approved Project, no mitigation measures are warranted for the also less than significant land use impacts from the 2018 Modified Project.

3.9 PUBLIC SERVICES

WATER SUPPLY

As described in Section 2.7.2 of FEIS, water for the casino development would be provided through a municipal connection that is already at the site. The estimated average daily water consumption provided in the FEIS was approximately 260,000 gallons per day (gpd).

The 2018 Modified Project would include a reduction of hotel rooms from 302 to 300, the addition of a covered garden/patio, and slight increases to the size of the proposed restaurants. The minor site plan

changes, more fully described in **Section 2.0**, would not change the water demand significantly. Mitigation Measure 7 (A) of the MMEP requires the Tribe to enter into a service agreement to reimburse the service provider for necessary new, upgraded and/or expanded water supply facilities required to serve the 2017 Approved Project. Since the planned modifications will not change the water usage, impacts from the 2018 Modified Project on water supply would remain less-than-significant.

WASTEWATER TREATMENT AND DISPOSAL

As described in Section 2.7.2 of the FEIS, the Tribe would obtain municipal sewer service for the 2017 Approved Project. The projected average daily wastewater flow provided in the FEIS was 232,000 gpd. Connections to sewer infrastructure are available in the immediate vicinity of the Elk Grove Mall site.

As stated in Appendix I (Water & Wastewater Feasibility Study) of the FEIS, the highest flow contributions are generally from the casino, hotel, and restaurant components of the 2017 Approved Project. Planned modifications to the 2017 Approved Project since the FEIS was issued include reducing the number of hotel rooms by two rooms, enclosing the garden/patio with dome/skylight, and slight increases to the size of the proposed restaurants. These minor site plan changes described in **Section 2.0** would not significantly change wastewater generation rates. Mitigation Measure 7 (A) of the MMEP also requires the Tribe to enter into a service agreement to reimburse the service provider for necessary new, upgraded and/or expanded wastewater facilities required to serve the 2018 Modified Project. For these reasons, impacts from the planned modifications would remain less-than-significant.

SOLID WASTE SERVICE

As described in Section 3.10.3 of the FEIS, solid waste would be transported to the Kiefer Landfill in Sacramento County. As stated therein, the landfill has a permitted capacity of 10,815 tons (or 67,594 cubic yards) per day and has nearly 113 million cubic yards of available capacity, and is estimated to have sufficient capacity to maintain operations through 2064. The FEIS estimated the 2017 Approved Project would generate 1,068 tons (or 6,675 cubic yards) of solid waste per year. With the changes in the 2018 Modified Project, the solid waste generation would be essentially the same. The solid waste generated by the 2018 Modified Project would continue to represent a negligible percentage of the annual capacity of the Kiefer Landfill.

ELECTRICITY, NATURAL GAS, AND OTHER UTILITIES

As described in Section 3.10.6 of the FEIS, the Sacramento Municipal Utility District (SMUD) provides electricity and PG&E provides natural gas to the Elk Grove Mall site. Energy use for heating and cooling the 2018 Modified Project would increase by approximately 5 to 6 percent compared to the project analyzed in the FEIS, as the building would have a slightly larger square footage and an enclosed garden/patio area. As stated in Section 4.10.6 of the FEIS, the final determination regarding the need for electrical facility upgrades will be made during the SMUD electrical service application process, but the

implementation of the 2018 Modified Project would result in a less-than-significant impact to electricity, natural gas, and telecommunications services and demand. Additionally, as further stated in Section 4.10.6 of the FEIS, the implementation of the energy-efficiency measures included as Mitigation Measures 7 (R) and (S) in the MMEP will further reduce the energy demand of and ensure adequate services for the 2018 Modified Project. No significant changes to the project's usage of electricity, natural gas, or other utilities have occurred for the 2018 Modified Project that would alter the conclusions of the FEIS or modify the recommended mitigation measures in the FEIS and the MMEP for the 2017 Approved Project.

LAW ENFORCEMENT, FIRE PROTECTION, AND EMERGENCY MEDICAL SERVICES

Law enforcement services for the casino would be provided by the City of Elk Grove Police Department. As stated in Section 4.10.6 of the FEIS, the 2016 MOU between the City of Elk Grove and the Tribe requires a one-time payment for police equipment and annual payments for police and code enforcement services. The planned modifications will not create any significant changes to law enforcement service in the area that would alter the conclusions in Section 4.10.6 of the FEIS that with the implementation of Mitigation Measures 7 (I) – (N) in the MMEP the impacts of the project to public law enforcement services will remain less than significant.

The Cosumnes Community Services District (Cosumnes CSD) Fire Department would provide fire protection and emergency medical services to the 2017 Approved Project, as stated in Section 2.7.2 of the FEIS. Cosumnes CSD serves an estimated 192,216 south Sacramento County residents with a full-time staff of 282 (including 25 administrative staff, 183 fire department staff, and 74 parks and recreation staff) and a part-time staff of 332 (Cosumnes CSD, 2017). The planned modifications will not lead to any significant changes in the project's need for fire protection or emergency medical services.

As stated in Section 3.10.5 of the FEIS, the nearest emergency room is located at Methodist Hospital of Sacramento, located approximately 5.7 miles north of the Elk Grove Mall site. The nearest trauma center is Kaiser Permanente South Sacramento Medical Center, located approximately 6 miles north of the Elk Grove Mall site. The planned modifications will not create any significant changes to emergency medical services in the area that would alter the conclusions of the FEIS.

SCHOOLS, LIBRARIES, AND PARKS

Because the 2018 Modified Project will not lead to an increase in employees at the casino and hotel resort, the modified plans will not result in any increase in the number of employees or children residing in Sacramento County beyond the number of new residents that would occur under the 2017 Approved Project. In addition, the modified plans will not result in any significant increase in the number of patrons at the 2018 Modified Project because the number of gaming machines in the casino will remain the same and the hotel capacity will decrease by two rooms. Thus, there are no significant changes from the 2017 Approved Project that would alter the conclusions in Section 4.7.6 of the FEIS that impacts to schools,

libraries, or parks in the area will be less than significant. Accordingly, no mitigation relating to impacts to schools, libraries, or parks in the area is required for the 2018 Modified Project.

FINDINGS

No additional impacts beyond those identified within the FEIS would occur to public services. Therefore, with the implementation of Mitigation Measures 7 (A) – (S) of the MMEP – which include measures to enter into service agreements for water supply and waste water services that will require the Tribe to participate in the cost of any necessary future new upgraded facilities and/or expanded water supply and waste water facilities required to serve the project, to reduce the solid waste stream, and to minimize energy use – impacts to public services would remain less than significant, as described in Section 4.10.6 of the FEIS.

3.10 NOISE

The noise environment and sensitive receptors in the vicinity of the Elk Grove Mall site are described in Section 3.11.3 of the FEIS. As stated therein, the primary source of existing noise on the Elk Grove Mall site is traffic along Hwy 99. No additional development has occurred in the immediate vicinity of the Elk Grove Mall site that would increase the noise levels in the surrounding area or add new sensitive receptors.

There are no anticipated changes to the construction noise that would be generated by the 2018 Modified Project, as the site plan changes would have a negligible impact on construction duration and intensity.

The levels of operational traffic noise anticipated under the 2018 Modified Project would be similar to those analyzed in Section 4.11.6 of the FEIS for the 2017 Approved Project. As described above in **Section 3.7**, levels of traffic generated by the 2018 Modified Project are anticipated to be nearly identical to those analyzed in the FEIS, and therefore the noise analysis presented in Section 4.11.6 of the FEIS remains accurate.

FINDINGS

No additional noise impacts beyond those identified in the FEIS would occur from the construction and operation of the 2018 Modified Project. Therefore, with the implementation of Mitigation Measures 8 (A) – (D) recommended in the MMEP, which include limitations on the time of day that construction using heavy equipment can occur, requirements for adequate mufflers on engine-powered equipment, use of exhaust breaks only in emergencies, and requirements that all generator sets be closed, impacts associated with noise levels would remain less than significant, as described in Section 4.11.6 of the FEIS.

3.11 HAZARDOUS MATERIALS

The Elk Grove Mall site contains partially constructed and currently vacant commercial structures, paved roadways and parking, and undeveloped ruderal/disturbed grassland. As described in Appendix Q of the FEIS, the Elk Grove Mall site's land uses prior to 2009 were agricultural; from 2009 onward the site has been developed with commercial structures.

The California State Water Resources Control Board (SWRCB) GeoTracker database and the California Department of Toxic Substances Control (DTSC) EnviroStor database were consulted to determine whether any new hazardous material releases may have occurred since the analysis in the FEIS was conducted and the Phase I ESA (Appendix Q of the FEIS) was prepared (SWRCB, 2018; DTSC, 2018). Based on the review of these two state databases, no new sites with hazardous material releases within 1.0 mile of the Elk Grove Mall site have been identified.

FINDINGS

Because no new environmental conditions relating to releases of hazardous materials have been identified in the vicinity of the Elk Grove Mall site since the FEIS was issued in December 2016 and there is no indication of any new hazardous material releases on the Elk Grove Mall site, no significant impacts with regard to hazardous materials contamination are anticipated. No additional impacts beyond those identified within the FEIS would occur. Therefore, with the implementation of Mitigation Measures 9 (A) – (D) provided in the MMEP, which include having personnel follow BMPs to reduce the potential for release of fuel, oil, and hydraulic fluids during construction and operation of the project as well as measures to address any contamination encountered during earth-moving activities, impacts from hazardous materials would remain less than significant, as described in Section 4.12.6 of the FEIS.

3.12 AESTHETICS/VISUAL RESOURCES

The visual resources setting and receptors in the vicinity of the Elk Grove Mall site are described in Section 3.13.4 of the FEIS. As stated therein, no identified scenic highways are located in the vicinity, and the County General Plan identifies Hwy 99 to the east of the Elk Grove Mall site as an aesthetic corridor.

The Proposed Project now includes a dome/skylight component; however, the hotel tower would remain the tallest element of the proposed development. While the dome/skylight represents an exterior design change, it does not represent a substantial difference from what was analyzed within Section 4.13.6 of the FEIS. See **Figure 3** that shows how the 2018 Modified Project will look with the dome/skylight from the entrance to the casino and hotel resort and from a person driving south on Highway 99.



West Elevation



East Elevation

FINDINGS

The changes to the 2017 Approved Project regarding visual components in the 2018 Modified Project would be substantially the same as what was analyzed in the FEIS, with the exception of the dome/skylight. The upper sections of the dome/skylight would be visible from certain segments of Hwy 99; however it would not be the most prominent or visible feature of the development as the hotel tower would be significantly taller. The FEIS concluded in Section 4.13.6 that the 2017 Approved Project “would create a positive visual impact, as it would result in a visually cohesive development that would be more aesthetically pleasing than the current partially completed, vacant buildings.” The dome/skylight would not have any additional impacts beyond those identified within the FEIS.

The dome/skylight would be consistent with the commercial and retail character of the site once the site is developed. The dome/skylight will only be partially visible from Hwy 99 as shown in **Figure 3**. Thus, with the exception of the dome/skylight, which has a neutral visual impact, the modified plans would not have any additional impacts on aesthetics/visual resources beyond those identified in the FEIS. Therefore, with the implementation of Mitigation Measures 10 (A) – (G) provided in the MMEP, which include the requirement that all exterior glass be non-reflective low-glare glass, that shielding and light placement be implemented to reduce light cast off-site, and that design elements be incorporated into the project to minimize the impact of buildings and parking lots on the viewshed, impacts to visual resources would remain less than significant, as described in Section 4.13.6 of the FEIS.

3.13 INDIRECT AND GROWTH-INDUCING EFFECTS

INDIRECT EFFECTS FROM OFF-SITE TRAFFIC MITIGATION IMPROVEMENTS

The off-site traffic mitigation improvements related to the Elk Grove Mall site were analyzed in Section 4.14.1 of the FEIS. Since the modified plans do not change the off-site traffic mitigation improvements, there will be no change in the direct and growth-inducing effects from those improvements. Thus, the mitigation for the 2017 Approved Project set out in Section 5.8 of the FEIS and incorporated into the MMEP as Mitigation Measures 3(D) – (E) and 6 (A) – (Q) remains sufficient to mitigate impacts from off-site traffic mitigation improvements to geology and soils, water resources, air quality, biological resources, cultural and paleontological resources, socioeconomic conditions, environmental justice, land use, public services, noise, hazardous materials, and aesthetics to a less-than-significant level.

INDIRECT EFFECTS FROM UTILITY/INFRASTRUCTURE IMPROVEMENTS RELATED TO THE 2017 APPROVED PROJECT

As of now, no off-site utility/infrastructure improvements have been required for either the 2017 Approved Project or the 2018 Modified Project. However, Mitigation Measures 7 (A) – (S) of the MMEP include measures for the Tribe to enter into service agreements for water supply and waste water services under which the Tribe will participate in the cost of any necessary future new, upgraded or expanded water supply and waste water facilities as needed to serve the project and to keep the impacts to public

services less than significant.

GROWTH-INDUCING EFFECTS

A growth-inducing effect is defined in Sections 1502.16(b) and 1508.8(b) of the CEQ NEPA regulations as an effect that fosters economic or population growth. Section 4.14.3 of the FEIS concludes that development of the Elk Grove Mall site will result in (1) one-time employment opportunities from construction that are temporary in nature and not anticipated to result in permanent relocation of employees into Sacramento County, and (2) permanent employment opportunities from operation that are anticipated to be filled with people already residing in the region and would, therefore, not require new housing. The FEIS also concluded that development and operation of the casino project will have potential for commercial growth and demand resulting from fiscal output generated throughout the City of Elk Grove and Sacramento County, but such demand would be diffused and distributed among a variety of different sectors and businesses in the City of Elk Grove and Sacramento County, and as a result, significant regional commercial growth-inducing impacts are not anticipated to occur.

The FEIS further concludes in Section 4.14.3 that the Elk Grove Mall site is situated in the vicinity of adjacent areas that will likely be improved with retail, commercial, and residential developments. These adjacent developments will likely occur, or not occur, irrespective of the implementation of the 2018 Modified Project. Additionally, near-term commercial/retail development would likely occur at the Elk Grove Mall site if the previously-approved mall adjacent to the casino is completed. Consequently, there would be no new growth-inducing effects related to such developments that would occur because of the 2018 Modified Project.

Development in the City of Elk Grove would be subject to the constraints of the City's general plan, local ordinances, and other planning policies and documents. New projects resulting from any induced effect would be subject to appropriate project-level environmental analysis and mitigation to the extent required by the California Environmental Quality Act (CEQA) and its implementing regulations. As discussed above, the minimal amount of commercial growth that may be induced by the 2018 Modified Project would not result in significant adverse environmental growth-inducing effects.

CONCLUSION

For the reasons stated above, no additional indirect and growth-inducing effects beyond those identified within the FEIS would occur as a result of the 2018 Modified Project and no additional mitigation measures are warranted beyond those set out in the MMEP to address impacts to geology and soils, water resources, air quality, biological resources, cultural and paleontological resources, socioeconomic conditions/environmental justice, public services, noise, hazardous materials, and aesthetics.

3.14 CUMULATIVE EFFECTS

There are currently two active City of Elk Grove sphere of influence (SOI) amendments (the Elk Grove Civic Complex and Bilby Ridge) pending before the Sacramento Local Area Formation Commission (LAFCo), and one that was approved in February 2018 (Kammerer/Highway 99; Locke, 2018), which is located near the Elk Grove Mall site, south of Kammerer Road. These three SOI amendments total 2,256 acres. However, it is reasonably foreseeable that the City's SOI may be expanded further and land subsequently annexed and developed.

Before development or annexation of lands within or proposed to be brought into the City's SOI, these new projects would undergo environmental review and necessary mitigation as required by CEQA and its implementing regulations, and would have to be consistent with local land use regulations. As described in Section 4.15.8 of the FEIS, cumulative impacts to all resource areas would remain less than significant with the incorporation of mitigation measures identified in Section 5.0 of the FEIS, including mitigation measures specifically for cumulative traffic impacts identified as 6 (K) – (O) in the MMEP. No additional mitigation measures to address cumulative impacts are warranted for the 2018 Modified Project.

As stated in Section 4.15.8 of the FEIS, direct and indirect carbon dioxide emissions have the potential to result in a significant cumulative effect to climate change. As analyzed in **Section 3.3** of this SIR and shown on **Table 3 and Table 4**, GHG emissions, which include carbon dioxide emissions from the operation of the 2018 Modified Project have been modeled to be approximately 81 MT more than those projected in the FEIS for the 2017 Approved Project. The Tribe has agreed to purchase approximately 81 MT of GHG ERCs to fully mitigate this 0.15 percent increase in GHG emissions from the operation of the 2018 Modified Project. Additionally, new California strategies and measures will result in a reduction of statewide GHG emissions, as stated in Section 4.15.3 of the FEIS, and Mitigation Measures 2 (A) – (D) in the MMEP will reduce GHG emissions, as stated in **Section 3.3** of this SIR. Therefore, there would be no climate change impact beyond that already analyzed in the FEIS and mitigated by MMEP Mitigation Measures B(1), C(1) – C(4), C(8), C(11), and D along with the Tribe's purchase of approximately 81 MT of GHG ERCs.

4.0 CONCLUSION

The current conditions of the Elk Grove Mall site remain largely unchanged from the time of the preparation of the FEIS. As discussed above in detail, the few modifications that have been planned since the FEIS was issued in December 2016 do not change the results of the analysis in the FEIS. The largest modifications to the original project design are the minor square footage differences and incorporation of a dome/skylight into the development. As analyzed within **Section 3.0**, the conclusions and mitigation measures for the Elk Grove Mall site set forth in the FEIS and in the MMEP remain adequate to mitigate any environmental impacts from the 2018 Modified Project. The 2018 Modified Project does not include any substantial changes that are relevant to environmental concerns, and there are no significant new

circumstances or information relevant to environmental concerns and bearing on the 2018 Modified Project and its impacts; therefore, no additional mitigation is warranted. The FEIS and the MMEP are adequate to meet the NIGC's NEPA compliance requirements for evaluating the 2018 Modified Project, and a SEIS does not appear to be necessary. Therefore, under 40 CFR § 1506.3, the NIGC may adopt the FEIS because it meets the standards of an adequate FEIS for the 2017 Approved Project and for the 2018 Modified Project under 40 CFR Parts 1500-1508. In addition, since the actions covered by the FEIS for the 2017 Approved Project and analyzed in this SIR for the 2018 Modified Project "are substantially the same" the NIGC is not required to recirculate the FEIS except as a final statement (40 CFR § 1506.3(b)).

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ATTACHMENT A

Mitigation, Monitoring, and Enforcement Plan

WILTON RANCHERIA FEE-TO-TRUST AND CASINO PROJECT

MITIGATION MONITORING AND ENFORCEMENT PLAN

Mitigation Monitoring Overview

This Mitigation Monitoring and Enforcement Plan (MMEP) has been developed to guide mitigation compliance before, during, and after implementation of the Bureau of Indian Affairs' (BIA's) Preferred Alternative. The mitigation measures described below in **Table 1** were developed through the analysis of potential impacts within the Final Environmental Impact Statement (EIS). As specified in **Table 1**, the compliance monitoring and evaluation will be performed by the Wilton Rancheria (Tribe), the City of Elk Grove (City), The County of Sacramento (County), the California Department of Transportation (Caltrans), the Cosumnes CSD Fire Department, the United States Fish and Wildlife Service (USFWS), and the United States Environmental Protection Agency (USEPA) as indicated in the description of each measure. The MMEP provides:

- Requirements for compliance of the mitigation measures specifically created to mitigate impacts;
- List of responsible parties; and
- Timing of mitigation measure implementation.

Where applicable, mitigation measures will be monitored and enforced pursuant to Federal law, tribal ordinances, and agreements between the Tribe and appropriate governmental authorities, as well as the Record of Decision (ROD). Note that numbering of mitigation measures listed in **Table 1** differs from the numbering of the mitigation measures listed in Section 6.0 of the ROD. **Table 1** includes only those mitigation measures that are applicable to Alternative F – the casino resort at the Elk Grove Mall site.

**TABLE 1
MITIGATION MONITORING AND ENFORCEMENT PLAN**

Mitigation Measure	Responsible for Monitoring and/or Reporting	Timing of Implementation	Verification (Date and Initials)
1. Geology and Soils			
<p>A. If the Tribe intends to disturb one acre or more of land during construction of the project, the Tribe shall comply with the terms of the then-current NPDES Construction General Permit from USEPA to address construction site runoff during the construction phase in compliance with the CWA. Among other requirements, at least 14 days prior to commencing earth-disturbing activities, a NOI shall be filed with the USEPA. A SWPPP shall be prepared, implemented, and maintained throughout the construction phase of the development, consistent with Construction General Permit requirements. The SWPPP shall detail BMPs to be implemented during construction and post-construction operation of the selected project alternative to reduce impacts related to soil erosion and water quality. The BMPs shall include, but are not limited to, the following:</p> <ol style="list-style-type: none"> 1. Existing vegetation shall be retained where practicable. To the extent feasible, grading activities shall be limited to the immediate area required for construction and remediation. 2. 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. 3. To the maximum extent feasible, no disturbed surfaces shall be left without erosion control measures in place. 4. Construction activities shall be scheduled to minimize land disturbance during peak runoff periods. Soil conservation practices shall be completed during the fall or late winter to reduce erosion during spring runoff. 5. Creating construction zones and grading only one area or part of a construction zone at a time shall minimize exposed areas. If practicable during the wet season, grading on a particular zone shall be delayed until protective cover is restored on the previously graded zone. Minimizing the size of construction staging areas and construction access roads to the extent feasible. 6. Disturbed areas shall be re-vegetated following construction activities. 7. Construction area entrances and exits shall be stabilized with large-diameter rock. 8. Sediment shall be retained on-site by a system of sediment basins, traps, or other appropriate measures. 9. A spill prevention and countermeasure plan shall be developed which identifies proper 	Tribe/USEPA	Planning Phase Construction Phase	

<p>storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used on-site.</p> <ol style="list-style-type: none"> 10. Petroleum products shall be stored, handled, used, and disposed of properly in accordance with provisions of the CWA (33 U.S.C. 1251 to 1387). 11. Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of surface and groundwater. 12. Fuel and vehicle maintenance areas shall be established away from all drainage courses and designed to control runoff. 13. Sanitary facilities shall be provided for construction workers. 14. Disposal facilities shall be provided for soil wastes, including excess asphalt during construction and demolition. 15. Other potential BMPs include use of wheel wash or rumble strips and sweeping of paved surfaces to remove any and all tracked soil. 			
<p>B. Construction workers shall be trained in the proper handling, use, cleanup, and disposal of chemical materials used during construction activities. Appropriate facilities to store and isolate contaminants shall be provided.</p>	Tribe	Construction Phase	
<p>C. Contractors involved in the project shall be trained on the potential environmental damage resulting from soil erosion prior to construction in a pre-construction meeting. Copies of the project's SWPPP shall be distributed at that time. Construction bid packages, contracts, plans, and specifications shall contain language that requires adherence to the SWPPP.</p>	Tribe	Planning Phase Construction Phase	
<p>2. Air Quality</p>			
<p>Construction</p>			
<p>A. The following dust suppression measures shall be implemented by the Tribe to control the production of fugitive dust (PM₁₀) and prevent wind erosion of bare and stockpiled soils:</p> <ol style="list-style-type: none"> 1. Spray exposed soil with water or other suppressant twice a day or as needed to suppress dust. 2. Minimize dust emissions during transport of fill material (fill material to be gathered primarily on-site) 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, and/or covering loads. 3. Restrict traffic speeds on site to 15 miles per hour to reduce soil disturbance. 4. Provide wheel washers to remove soil that would otherwise be carried off site by vehicles to decrease deposition of soil on area roadways. 5. Cover dirt, gravel, and debris piles as needed to reduce dust and wind-blown debris. 6. Provide education for construction workers regarding incidence, risks, symptoms, treatment, 	Tribe	Planning Phase Construction Phase	

<p>and prevention of Valley Fever.</p>			
<p>B. The following measures shall be implemented by the Tribe to reduce emissions of criteria pollutants, greenhouse gases (GHGs), and diesel particulate matter (DPM) from construction.</p> <ol style="list-style-type: none"> 1. The Tribe shall control criteria pollutants and GHG emissions by requiring all diesel-powered equipment be properly maintained and minimizing 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 mitigation. 2. Require construction equipment with a horsepower rating of greater than 50 be equipped with at least CARB rated Tier 3 engines, and if practical and available, Tier 4 engines. The corresponding Tier 3 engines shall also be fitted with diesel particulate filters. 3. Require the use of low ROG (250 grams per liter or less) for architectural coatings to the extent practicable. 4. Environmentally preferable materials, including recycled materials, shall be used to the maximum extent practical for construction of facilities. 	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	
<p>Operational Vehicle and Area Emissions</p>			
<p>C. The Tribe shall reduce emissions of criteria air pollutants and GHGs during operation through one or more of the following measures, as appropriate:</p> <ol style="list-style-type: none"> 1. The Tribe shall use efficient clean fuel vehicles that use alternative fuel in its vehicle fleet where practicable, which would reduce criteria pollutants and GHG emissions within the Sacramento metropolitan region. The reduction in GHG emissions would vary depending on vehicle number, type, year, and associated fuel economy. 2. The Tribe shall provide preferential parking for vanpools and carpools, which would reduce criteria pollutants by promoting the use of transportation options other than single-occupant vehicles. This would reduce running and total exhaust emissions of particulate matter, carbon monoxide (CO), nitrogen oxides (NOx), and sulfur dioxide (SO₂) by 2 percent. Running exhaust emissions of GHGs would be reduced 2 percent. 3. The Tribe shall use low-flow appliances and utilize recycled water to the extent practicable. The Tribe shall use drought-tolerant landscaping and provide "Save Water" signs near water faucets. The installation of low-flow water fixtures could reduce emissions of GHG by 17-31 percent. Water-efficient landscaping could reduce GHG emissions by up to 70 percent. Reductions in indirect criteria pollutants would be expected; however, these reductions may not be in the same air basin as the project. 4. The Tribe shall control criteria pollutants, GHG, and DPM emissions during operation by requiring all diesel-powered vehicles and equipment be properly maintained and minimizing 	<p>Tribe</p>	<p>Planning Phase Operation Phase</p>	

<p>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. Implementation of this mitigation could reduce GHG emissions from truck refrigeration units by 26-71 percent. Reductions in criteria pollutant and DPM emissions would also be expected.</p> <ol style="list-style-type: none"> 5. The Tribe shall use energy-efficient lighting, which would reduce indirect criteria pollutants and GHG emissions. Using energy-efficient lighting would reduce the project's energy usage, thus reducing the project's indirect GHG emissions. This could reduce GHG emissions by 16 to 40 percent, depending on the type of energy-efficient lighting. Reductions in indirect criteria pollutants would also be expected; however, these reductions may not be in the same air basin as the project. 6. The Tribe shall install recycling bins throughout the hotel and casino for glass, cans, and paper products. Trash and recycling receptacles shall be placed strategically outside to encourage people to recycle. The amount of GHG reduced through recycling varies depending on the project, is difficult to quantify, and based on life-cycle analysis. 7. The Tribe shall plant trees and vegetation in appropriate densities to maximize air quality benefits 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. However, trees and vegetation emit ROG_s. 8. The Tribe shall use energy-efficient appliances and equipment in the hotel and casino. ENERGY STAR refrigerators, clothes washers, dishwashers, and ceiling fans use 15 percent, 25 percent, 40 percent, and 50 percent less electricity than standard appliances, respectively. These reductions reduce GHG and criteria pollutant emissions from power plants. 9. The Tribe shall purchase 53.75 tons of NO_x Emissions Reduction Credits (ERCs) as dictated in the Final Conformity Determination, included as an attachment to the ROD. 10. Because the significant air quality effects are associated with operation of the project and not with construction of the facility, real, surplus, permanent, quantifiable, and enforceable ERCs will be purchased prior to the opening day of the casino-resort or other project. With the purchase of the ERCs the project would conform to the applicable State Implementation Plan and result in a less than adverse impact to regional air quality. ERCs shall be purchased (1) in the Sacramento Nonattainment Area (as defined in Final EIS Section 3.4.2) and/or (2) in the San Joaquin Valley Air Basin and/or in another adjacent district with an equal or higher nonattainment classification (severe or extreme) meeting the requirements outlined in 40 C.F.R. 93.158(a)(2), with credits available within 50 miles of the project site given priority. 			
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<p>11. As an alternative to or in combination with purchasing the above ERCs the Tribe may implement one or more of the following measures which could reduce NOx emissions to less than 25 tons per year:</p> <ul style="list-style-type: none"> a. Purchase low emission buses to replace older municipal or school buses used within the Sacramento Valley Air Basin. b. Implement ride-sharing programs at the project site and/or within the Sacramento Valley Air basin. c. Use 100 percent electric vehicles at the project site. d. Purchase hybrid vehicles to replace existing governmental fleet vehicles within the Sacramento Valley Air Basin. e. Implement other feasible mitigation measures to reduce project-related NOx and ROG emissions. f. The Tribe shall provide a bus driver lounge and adopt and enforce an anti-idling ordinance for buses, which will discourage bus idling during operation of the project. 			
<p>Cumulative and Greenhouse Gas Emissions</p>			
<p>D. The Tribe shall purchase 31,015 MT of GHG ERCs. As an alternative to or in combination with purchasing the above GHG ERCs, the Tribe shall implement renewable energy project(s), which may include but are not limited to solar power, wind energy, and/or other form(s) of renewable energy. The reduction in emissions from implementation of renewable energy and/or the purchase of ERCs would reduce project-related GHG emissions to below 25,000 MT of CO₂e. As all or part of any required or voluntary mitigation of GHG impacts, the Tribe may purchase carbon ERCs from the Climate Action Reserve, the Verified Carbon Standard, the American Carbon Registry, and/or an equivalent carbon ERCs trading markets that have the same or more stringent standards for carbon emissions reduction projects that reduce atmospheric GHGs or reflect direct GHG emissions reductions achieved by existing GHG emitters.</p>	<p>Tribe</p>	<p>Planning Phase Operation Phase</p>	
<p>3. Biological Resources</p>			
<p>Federally Listed and Other Sensitive Species</p>			
<p>A. A pre-construction survey for nesting migratory birds and raptors shall be conducted within 500 feet of the proposed construction areas if initiation of clearing activities is scheduled to occur during the nesting period (March 1 to September 30). The pre-construction survey shall be conducted within 14 days prior to initiation of construction activity.</p>	<p>Tribe</p>	<p>Planning Phase</p>	
<p>B. The qualified biologist shall document and submit the results of the pre-construction survey within 30 days following the survey. The documentation shall include a description of the</p>	<p>Tribe/USFWS</p>	<p>Planning Phase Construction Phase</p>	

<p>methodology including dates of field visits, the names of survey personnel, a list of references cited and persons contacted, and a map showing the location(s) of any bird nests observed on the project site. If no active nests are identified during the pre-construction survey, then no further mitigation is required. If active migratory bird nests are identified, a qualified biologist shall establish an appropriate buffer around the nest based on the species identified to ensure no disturbance will occur until a qualified biologist has determined the young have fledged. No active nests shall be disturbed without a permit or other authorization from the USFWS.</p>			
<p>C. The following measures shall be implemented to minimize the effects of lighting and glare on birds and other wildlife:</p> <ol style="list-style-type: none"> 1. Downcast lights shall be installed with top and side shields to reduce upward and sideways illumination to reduce potential disorientation affects from non-directed shine to birds and wildlife species. 2. As many exterior and interior lights (in rooms with windows) as practicable, consistent with public safety concerns, shall be turned off during the peak bird migration hours of midnight to dawn to reduce potential collisions of migratory birds with buildings 	Tribe	Planning Phase Construction Phase Operation Phase	
<p>Mitigation for Off-Site Road Improvements</p>			
<p>D. Once an alternative has been selected, a formal Jurisdictional Delineation shall be conducted for all areas of potential disturbance from recommended off-site road improvements. The results of the delineation shall be verified by the USACE and a Section 404 permit shall be obtained prior to any disturbance of jurisdictional waters of the U.S. Refer to Section 5.54.2 of the Final EIS for more details.</p>	Tribe/USACE	Planning Phase	
<p>E. If any previously unknown federal or state listed species or habitats are discovered during the pre-construction or construction phases of off-site road improvements, a qualified biologist shall be consulted to ensure that potential impacts are eliminated or mitigated. Refer to Section 5.54.1 of the Final EIS for more details about species-specific mitigation measures.</p>	Tribe	Planning Phase Construction Phase	
<p>4. Cultural and Paleontological Resources</p>			
<p>A. In the event of inadvertent discovery of prehistoric or historic archaeological resources during construction-related earth-moving activities, all such finds shall be subject to Section 106 of the National Historic Preservation Act as amended (36 C.F.R. 800), and the BIA shall be notified. Specifically, procedures for post-review discoveries without prior planning pursuant to 36 C.F.R. 800.13 shall be followed. All work within 50 feet of the find shall be halted until a professional archaeologist meeting the Secretary of the Interior's qualifications (36 C.F.R. 61) can assess the significance of the find. If any find is determined to be significant by the archaeologist, then</p>	Tribe	Construction Phase	

<p>representatives of the Tribe shall meet with the archaeologist to determine the appropriate course of action, including the development of a Treatment Plan, if necessary. All significant cultural materials recovered shall be subject to scientific analysis, professional curation, and a report prepared by the professional archaeologist according to current professional standards.</p>			
<p>B. In the event of inadvertent discovery of paleontological resources during construction-related earth-moving activities, all such finds shall be subject to Section 101 (b)(4) of NEPA (40 C.F.R. 1500 1508), and the BIA shall be notified. All work within 50 feet of the find shall be halted until a professional paleontologist can assess the significance of the find. A qualified professional paleontologist shall be retained to assess the find. If the find is determined to be significant by the paleontologist, then representatives of the BIA shall meet with the paleontologist to determine the appropriate course of action, including the development of an Evaluation Report and/or Mitigation Plan, if necessary. All significant paleontological materials recovered shall be subject to scientific analysis, professional curation, and a report prepared by the professional paleontologist according to current professional standards.</p>	<p>Tribe</p>	<p>Construction Phase</p>	
<p>C. If human remains are discovered during ground-disturbing activities on Tribal lands, all construction activities shall halt within 100 feet of the find. The Tribe, BIA, and County Coroner shall be contacted immediately, and the County Coroner shall determine whether the remains are the result of criminal activity; if possible, a human osteologist should be contacted as well. If Native American, the provisions of the Native American Grave Protection and Repatriation Act (NAGPRA) shall apply to the treatment and disposition of the remains. Construction shall not resume in the vicinity until final disposition of the remains has been determined.</p>	<p>Tribe</p>	<p>Construction Phase</p>	
<p>D. In the event that off-site traffic mitigation improvements are implemented, detailed plans for those improvements, including limits of construction, shall be developed. Prior to construction, cultural resources record searches and archaeological or architectural surveys shall be completed. Any buildings or structures over 50 years old that may be affected by the required improvements, once they are defined in detail, shall be identified. All significant resources shall be avoided if possible, and if not, a mitigation plan prepared by a qualified archaeologist or architectural historian shall be implemented.</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	
<p>5. Socioeconomics</p>			
<p>A. The Tribe shall make in-lieu payments adequate to replace revenues lost by Sacramento County due to reduced property taxes received by the County from those land parcels taken into trust. The amount of the payments shall be adjusted to take into account payments identified in Section 6.9 of the ROD for various municipal services.</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase Operation Phase</p>	

<p>B. Payments made pursuant to local agreements between the Tribe and local governments pursuant to Memorandums of Understanding (available in supplemental Appendix B in this Final EIS), including Sacramento County and/or the City of Elk Grove, would offset fiscal impacts and be used to provide support for public services (including, but not limited to, law enforcement), staffing, studies, infrastructure, community benefits, and utilities.</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase Operation Phase</p>	
<p>C. The Tribe shall contribute no less than \$50,000 annually to a program that treats problem gamblers. In order to maximize the effectiveness of the payments, the organization that receives the payments for problem gambling treatment must serve the Sacramento County region and be accessible to County residents.</p>	<p>Tribe</p>	<p>Operation Phase</p>	
<p>D. The Tribe shall prominently display (including on any automatic teller machines (ATMs) located on-site) materials describing the risk and signs of problem and pathological gambling behaviors. Materials shall also be prominently displayed (including on any ATMs located on-site) that provide available programs for those seeking treatment for problem and pathological gambling disorders, including but not limited to a toll-free hotline telephone number.</p>	<p>Tribe</p>	<p>Operation Phase</p>	
<p>E. The Tribe shall train employees to recognize domestic violence and sexual assault situations, display domestic violence hotline numbers, and work with local agencies in domestic violence and sexual assault prevention.</p>	<p>Tribe</p>	<p>Operation Phase</p>	
<p>F. The Tribe shall conduct annual customer surveys in an attempt to determine the number of problem and pathological gamblers and make this information available to state or federal gaming regulators upon request.</p>	<p>Tribe</p>	<p>Operation Phase</p>	
<p>G. The Tribe shall undertake responsible gaming practices that at a minimum require that employees be educated to recognize signs of problem gamblers, that employees be trained to provide information to those seeking help, and that a system for voluntary exclusion be made available.</p>	<p>Tribe</p>	<p>Operation Phase</p>	
<p>H. ATMs shall not be visible from gaming machines and gaming tables.</p>	<p>Tribe</p>	<p>Operation Phase</p>	
<p>6. Transportation</p>			
<p>A. The Tribe shall pay a full share of the cost of implementing recommended mitigation measures when LOS is acceptable without the addition of project trips. An exception to this general recommendation would occur in situations where the project's contribution to operation of an intersection may be relatively small, but sufficient to cause an intersection that is on the verge of operating unacceptably to operate at an unacceptable LOS. In such cases, the Tribe shall be</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	

<p>responsible for its fair share of the costs of mitigation caused by the added project trips generated, calculated as described in the next paragraph and/or set out below in the "Cumulative" section.</p> <p>Where transportation infrastructure is shown as having an unacceptable LOS with the addition of traffic from the project alternatives (and caused at least in part from project traffic), the Tribe shall pay for a fair share of costs for the recommended mitigation (including right-of-way and any other environmental mitigation). In such cases, the Tribe shall be responsible for the incremental impact that the added project trips generate, calculated as a percentage of the costs involved for construction of the mitigation measure. Fair-share proportion represents the fair-share percentage calculated using the methodology presented in the California Department of Transportation (Caltrans) Guide for the Preparation of Traffic Impact Studies (2002). The Tribe shall make fair share contributions available prior to initiation of road improvement construction.</p>			
Construction			
<p>B. A traffic management plan shall be prepared in accordance with standards set forth in the Manual on Uniform Traffic Control Devices for Streets and Highways. The traffic management plan shall be submitted to each affected local jurisdiction and/or agency. Also, prior to construction, the contractor shall coordinate with emergency service providers to avoid obstructing emergency response service. Police, fire, ambulance, and other emergency response providers shall be notified in advance of the details of the construction schedule, location of construction activities, duration of the construction period, and any access restrictions that could impact emergency response services. Traffic management plans shall include details regarding emergency service coordination. Copies of the traffic management plans shall be provided to all affected emergency service providers.</p>	<p>Tribe/City/ Cosumnes CSD Fire Department</p>	<p>Planning Phase Construction Phase</p>	
<p>C. Flagging, performed in consultation with the California Highway Patrol (CHP), Caltrans, and the SCSD, shall be provided when necessary to assist with construction traffic control.</p>	<p>Tribe/Caltrans</p>	<p>Planning Phase Construction Phase</p>	
<p>D. Transport of construction material shall be scheduled outside of the area-wide commute peak hours.</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	
<p>E. Where feasible, lane closures or obstructions associated with construction of the project shall be limited to off-peak hours to reduce traffic congestion and delays.</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	
<p>F. Roadways subject to heavy fill truck traffic shall be assessed by an independent third party</p>	<p>Tribe</p>	<p>Planning Phase</p>	

consultant prior to the start of construction and following the completion of construction. If the third party determines that roadway deterioration has occurred as a result of casino construction, the Tribe shall pay to have the affected roadway(s) resurfaced to restore the pavement to at least pre-construction condition, unless the resurfacing is already planned to occur within a year or sooner in conjunction with other planned or proposed roadway improvements.		Construction Phase	
Operation			
G. The Tribe shall enter into agreements with Sacramento County and/or City of Elk Grove as applicable and/or set appropriate funds aside in a dedicated account to fund its fair-share contribution toward future vicinity roadway maintenance and improvements.	Tribe/City/County	Planning Phase	
H. Promenade Parkway/Bilby Road Intersection. The WB approach shall be widened to provide three left-turn lanes, one through lane, and one right-turn lane; and a NB right-turn overlap signal phase shall be provided during the WB left-turn phase.	Tribe	Construction Phase	
I. Grant Line Road Widening. Grant Line Road shall be widened to four lanes from Waterman Road to Bradshaw Road.	Tribe	Construction Phase	
J. Kammerer Road Improvements. The Tribe shall pay a fair-share contribution of 6 percent towards future mitigation costs for Kammerer Road improvements.	Tribe	Planning Phase	
Cumulative			
K. Intersection Improvements. Implement Mitigation Measures 6.H and 6.I.	Tribe	Construction Phase	
L. Hwy 99 SB Ramps/Grant Line Road. The SB approach shall be widened to provide one left-turn lane, one shared left/through/right lane, and two right turn lanes.	Tribe	Construction Phase	
M. Promenade Parkway/Kammerer Road. Signal timings at the Promenade Parkway/Kammerer Road intersection shall be optimized and the width of the raised median at the WB approach shall be reduced to provide a second left-turn lane. A NB right-turn overlap signal phase shall be provided during the WB left-turn phase.	Tribe	Construction Phase	
N. Grant Line Road/East Stockton Boulevard. The SB approach shall be restriped to provide one left-turn lane, one shared through/right lane, and one right-turn lane. The NB/SB signal phasing shall be converted from split to protected left-turn phasing. Traffic signal coordination with adjacent signalized intersections shall be implemented to improve progression along Grant	Tribe	Construction Phase	

Line Road during weekday PM peak period.			
<p>O. Contribute a fair-share funding proportion towards future freeway improvement projects along Hwy 99, to be identified through coordination with Caltrans. Fair-share funding for long term improvements shall be made available prior to the need for the improvements. Funds shall be placed in an escrow account, if necessary, for use by the governmental entity with jurisdiction over the road to be improved so that the entity may design, obtain approvals/permits for, and construct the recommended road improvement. Caltrans is currently working with the City of Elk Grove to establish a subregional mitigation fee program which would cover this portion of the Hwy 99 corridor. Because this program has yet to be adopted, the ultimate fee structure for development project contribution has yet to be confirmed. For reference purposes, the project's fair-share contribution towards future mitigation costs for Hwy 99 freeway improvements within the project vicinity would be 26 percent.</p>	Tribe/Caltrans	Planning Phase	
Multi-Rider Transportation			
<p>P. The Tribe shall institute a shuttle service or comparable private multi-rider transportation system to provide alternative transportation options other than single-occupant vehicles for casino patrons and/or employees.</p>	Tribe	Planning Phase Operation Phase	
<p>Q. The Tribe shall work cooperatively with the City of Elk Grove to implement the effective expansion of public transportation to and from the Elk Grove Mall site prior to operation.</p>	Tribe/City	Planning Phase Construction Phase	
7. Public Services			
Off-Site Water and Wastewater Services			
<p>A. The Tribe shall enter into a service agreement prior to project operation to reimburse the City of Elk Grove or the applicable service provider, as appropriate, for necessary new, upgraded, and/or expanded water and/or wastewater collection, distribution, or treatment facilities. This service agreement shall include, but is not limited to, fair share compensation for new, upgraded, and/or expanded water supply and wastewater conveyance facilities necessary to serve development of the selected site, including development of appropriately sized infrastructure to meet anticipated flows and revisions or addendums to existing infrastructure master plans that may require updating as a result of project operation. Such improvements shall be sized to maintain existing public services at existing levels. The service agreement shall also include provisions for monthly services charges consistent with rates paid by other commercial users.</p>	Tribe/City	Planning Phase	

Solid Waste			
B. Construction waste shall be recycled to the fullest extent practicable by diverting green waste and recyclable building materials (including, but not limited to, metals, steel, wood, etc.) away from the solid waste stream.	Tribe	Construction Phase	
C. Environmentally preferable materials, including recycled materials, shall be used to the extent readily available and economically practicable for construction of facilities.	Tribe	Construction Phase	
D. During construction, the site shall be cleaned daily of trash and debris to the maximum extent practicable.	Tribe	Construction Phase	
E. A solid waste management plan shall be developed and adopted by the Tribe that addresses recycling, solid waste reduction, and reuse of materials on site to reduce solid waste sent to landfills. These measures shall include, but not be limited to, the installation of a trash compactor for cardboard and paper products, and periodic waste stream audits.	Tribe	Planning Phase Operation Phase	
F. Recycling bins shall be installed throughout the facilities for glass, cans, and paper products.	Tribe	Operation Phase	
G. Trash and recycling receptacles shall be placed strategically throughout the site to encourage people not to litter.	Tribe	Operation Phase	
H. Security guards shall be trained to discourage littering on site.	Tribe	Operation Phase	
Law Enforcement			
I. Parking areas shall be well lit and monitored by parking staff and/or roving security guards at all times during operation. This will aid in the prevention of auto theft and other similar criminal activity.	Tribe	Planning Phase Construction Phase Operation Phase	
J. Areas surrounding the gaming facilities shall have "No Loitering" signs in place, be well lit, and be patrolled regularly by roving security guards.	Tribe	Operation Phase	
K. The Tribe shall provide traffic control with appropriate signage and the presence of peak-hour traffic control staff during special events. This would aid in the prevention of off-site parking.	Tribe	Operation Phase	
L. The Tribe shall conduct background checks of all gaming employees and ensure that all employees meet licensure requirements established by IGRA and the Tribe's Gaming	Tribe	Operation Phase	

Ordinance.			
M. The Tribe shall adopt a Responsible Alcoholic Beverage Policy that shall include, but not be limited to, training for staff and checking identification of patrons and refusing service to those who have had enough to drink. The Tribe shall also adopt a policy to assist in preventing the use of casino and hotel facilities by unattended minors and known gang members.	Tribe	Planning Phase Operation Phase	
N. Prior to operation, the Tribe shall enter into agreements to reimburse the City of Elk Grove for quantifiable direct and indirect costs incurred in conjunction with providing law enforcement services per the Memorandum of Understanding by and between the City of Elk Grove and Wilton Rancheria, dated September 29, 2016.	Tribe/City	Planning Phase	
Fire Protection and Emergency Services			
O. During construction, any construction equipment that normally includes a spark arrester shall be equipped with an arrester in good working order. This includes, but is not limited to, vehicles, heavy equipment, and chainsaws. Staging areas, welding areas, or areas slated for development using spark-producing equipment shall be cleared of dried vegetation or other materials that could serve as fire fuel. To the extent feasible, the contractor shall keep these areas clear of combustible materials in order to maintain a firebreak.	Tribe	Construction Phase	
P. Prior to operation, the Tribe shall enter into a MOU and/or a service agreement to reimburse the Cosumnes CSD Fire Department for additional demands caused by the operation of the facilities on trust property. The agreement shall address any required conditions and standards for emergency access and fire protection systems.	Tribe/Cosumnes CSD Fire Department	Planning Phase	
Electricity, Natural Gas, and Telecommunications			
Q. The Tribe shall contact the Utility Notification Center, which provides a free "Dig Alert" to all excavators (e.g., contractors, homeowners, and others) in the State of California. This call shall automatically notify all utility service providers at the excavator's work site. In response, the utility service providers shall mark or stake the horizontal path of underground facilities, provide information about the facilities, and/or give clearance to dig.	Tribe	Planning Phase Construction Phase	
R. The selected HVAC system shall minimize the use of energy by means of using high efficiency variable speed chillers, high efficiency low emission steam and/or hot water boilers, variable speed hot water and chilled water pumps, variable air volume air handling units, and air-to-air heat recovery where appropriate.	Tribe	Planning Phase Construction Phase Operation Phase	

<p>S. Energy-efficient lighting shall be installed throughout the facilities. Dual-level light switching shall be installed in support areas to allow users of the buildings to reduce lighting energy usage when the task being performed does not require all lighting to be on. Day lighting controls shall be installed near windows to reduce the artificial lighting level when natural lighting is available. Controls shall be installed for exterior lighting so it is turned off during the day.</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase Operation Phase</p>	
<p>8. Noise</p>			
<p>Construction</p>			
<p>A. Construction using heavy equipment shall not be conducted between 10:00 p.m. and 7:00 a.m.</p>	<p>Tribe</p>	<p>Construction Phase</p>	
<p>B. All engine-powered equipment shall be equipped with adequate mufflers. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use shall be limited to emergencies.</p>	<p>Tribe</p>	<p>Construction Phase</p>	
<p>C. Loud stationary construction equipment shall be located as far away from residential receptor areas as feasible.</p>	<p>Tribe</p>	<p>Construction Phase</p>	
<p>D. All generator sets shall be provided with enclosures.</p>	<p>Tribe</p>	<p>Construction Phase</p>	
<p>9. Hazardous Materials</p>			
<p>A. 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:</p> <ol style="list-style-type: none"> 1. To reduce the potential for accidental release, fuel, oil, and hydraulic fluids shall be transferred directly from a service truck to construction equipment. 2. Catch-pans shall be placed under equipment to catch potential spills during servicing. 3. Refueling shall be conducted only with approved pumps, hoses, and nozzles. 4. All disconnected hoses shall be placed in containers to collect residual fuel from the hose. 5. Vehicle engines shall be shut down during refueling. 6. No smoking, open flames, or welding shall be allowed in refueling or service areas. 7. Refueling shall be performed away from bodies of water to prevent contamination of water in the event of a leak or spill. 8. Service trucks shall be provided with fire extinguishers and spill containment equipment, such as absorbents. 9. Should a spill contaminate soil, the soil shall be put into containers and disposed of in 	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	

<p>accordance with local, state, and federal regulations.</p> <p>10. All containers used to store hazardous materials shall be inspected at least once per week for signs of leaking or failure.</p>			
<p>B. 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.</p>	Tribe	Construction Phase	
<p>C. Hazardous materials must be stored in appropriate and approved containers in accordance with applicable regulatory agency protocols and shall be stored and used on-site at the lowest volumes required for operational purposes and efficacy.</p>	Tribe	Construction Phase Operation Phase	
<p>D. Potentially hazardous materials, including fuels, shall be stored away from drainages, and secondary containment shall be provided for all hazardous materials stored during construction and operation.</p>	Tribe	Construction Phase Operation Phase	
10. Aesthetics			
<p>A. Lighting shall consist of limiting pole-mounted lights to a maximum of 25 feet tall.</p>	Tribe	Planning Phase Construction Phase	
<p>B. All lighting shall be high pressure sodium or light-emitting diode (LED) with cut-off lenses and downcast illumination, unless an alternative light configuration is needed for security or emergency purposes.</p>	Tribe	Planning Phase Construction Phase Operation Phase	
<p>C. Placement of lights on buildings shall be designed in accordance with Unified Facilities Criteria (UFC) 3-530-01, Interior, Exterior Lighting, and Controls so as not to cast light or glare offsite. No strobe lights, spot lights, or flood lights shall be used.</p>	Tribe	Planning Phase Construction Phase Operation Phase	
<p>D. Shielding, such as with a horizontal shroud, shall be used in accordance with UFC 3-350-01 for all outdoor lighting so as to ensure it is downcast.</p>	Tribe	Planning Phase Construction Phase Operation Phase	
<p>E. All exterior glass shall be non-reflective low-glare glass.</p>	Tribe	Planning Phase Construction Phase	

<p>F. Screening features and natural elements shall be integrated into the landscaping design of the project to screen the view of the facilities from directly adjacent existing residences.</p>	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	
<p>G. Design elements shall be incorporated into the project to minimize the impact of buildings and parking lots on the viewshed. These elements include:</p> <ol style="list-style-type: none"> 1. Incorporation of landscape amenities to complement buildings and parking areas, including setbacks, raised landscaped berms and plantings of trees and shrubs. 2. Use of earth tones or color shades complimentary to surrounding development in paints and coatings, and native building materials such as stone as applicable. 	<p>Tribe</p>	<p>Planning Phase Construction Phase</p>	

ATTACHMENT B

Air Quality Modeling Output Files and Calculation Tables

CALEEMOD INPUT FILES

CalEEMod Inputs

Wilton Rancheria Fee-to-Trust and Casino EIS
2018 Modified Project

Project-Specific Inputs for the Wilton Casino

Input	Type of Input	Project Specific Inputs	
		Inputs	Source/Notes
Project Name	Project Name	Wilton Casino	--
Project Location	Air Quality District/ Air Basin	SVAB	Modeler, based on location
Climate zone	Climate Zone Number	6	Modeler, based on location
Land Use Setting	Urban or Rural	Rural	Modeler, based on location
Operational Year	1st year of operation after full buildout.	2020	Project Description
Utility Company	Utility Company Name	PG&E	2014 EIR
Land Use Type and Subtype	Residential, Commercial, Recreation, etc.	See Table 1.	See Table 1.
Unit Amount	Size of Buildings or Number of units for each Land Use Type.	See Table 1.	See Table 1.
Lot Acreage	Acreage of each Land Use Type	See Table 1.	See Table 1.
Population	Population based on persons/household	See Table 1.	See Table 1.
Construction Phases	Type of construction phase (Demo, Site Prep, etc.) and beginning and ending dates	General Construction 5/1/2018 to 11/1/2019	1.5 years of construction
Off-Road Equipment	Type of equipment (Excavator, Dozer, etc.) and number of units per construction phase	See Table 2.	See Table 2.
Demolition	Sq ft or tons of Demo	--	--
Construction Trip Gen Rate	Average number of one-way trips per day	See Table 2.	See Table 2.
Operational Trip Reductions	% reduction in trips.	10 percent reduction in trips generated due to diverted link.	2014 Fehr & Peers Traffic Impact Study.
Operational Trip Gen Rate and trip length	Trips and trip lengths	See Tables 3.	See Tables 3.
Area Sources	Hearths – # of wood-burning fireplaces, #of gas fireplaces, and # of units with no fireplace.	Not Applicable	No hearths are included in the project design.
	Landscape Equipment - % of equipment that is electric.	--	--
Energy Use	Project Specific Emission Factors.	--	--

Input	Type of Input	Project Specific Inputs	
		Inputs	Source/Notes
Water and Wastewater	Indoor and outdoor water use for each Land Use Subtype in gallons per year.	See Table A of the Water and Wastewater Feasibility Study – Wilton Rancheria by Summit, 2014.	Water and Wastewater Feasibility Study – Wilton Rancheria by Summit, 2014.
Solid waste	Tons of solid waste generated per year	1,068	Table 4.10-6 of the FEIS
	Land Fill Gas Capture Rate	85%	CARB's AB 32 landfill Methane Rule.
Stationary Sources	Emergency Generator	See Table 6.	Based on similar casino/hotel projects.
	Boilers	See Table 6.	
Operational off-road equipment	Excavator, Dozer, etc.	--	--
Land Use Change	Vegetation land use type (cropland, etc.) and initial and final acreage	--	--
Sequestration	Type and net number of new trees added	--	--

Source: AES, 2018; CalEEMod, 2016.3.2.

Project-Mitigation Inputs for the Wilton Casino

Mitigation Input Category	CAPCOA Mitigation Number	Include in Model? (yes/no)	Type of Input / Unit	Project Specific Inputs	
				Inputs	Source/Notes
Off-Road Equipment	C-1	Yes	Engine Type, DPF Level, and Oxidation Catalyst	See Table 4.	See Table 4.
Soil Stabilizer for Unpaved Roads	N/A	Yes	PM10 (% Reduction)	10%	Default % Reduction.
	N/A		PM2.5 (% Reduction)	10%	Default % Reduction.
Water Exposed Area	N/A	Yes	Frequency (per day)	2 times per day	Default % Reduction
	N/A		PM10 (% Reduction)	55%	Default % Reduction.
	N/A		PM2.5 (% Reduction)	55%	Default % Reduction.
Replace Ground Cover of Area Disturbed	N/A	No	PM10 (% Reduction)	--	--
	N/A		PM2.5 (% Reduction)	--	--
Unpaved Road Mitigation	N/A	No	Moisture Content (%)	--	--
	N/A	Yes	Vehicle Speed (mph)	15 mph	2002 Revised DEIR, Appendix D and 2004 MMRP, Mitigation Measure A-A.
Type of Residential	N/A	Yes	Type of Residential	--	--
Increased Density	LUT-1	No	Dwelling Units/Acre	--	--
			Job/Job Acre	--	--
Increased Diversity	LUT-3	No	Yes or No	--	--
Improved Walkability Design	LUT-9	No	Intersections/Square Miles	--	--
Improve Destination Accessibility	LUT-4	No	Distance to Downtown/Job Ctr	--	--
Increased Transit Accessibility	LUT-5	No	Average Distance to Transit Station (miles)	--	--
Integrated Below Market Rate Housing	LUT-6	No	# Dwelling Units Below Market Rate	--	--
Improve Pedestrian Network	SDT-1	No	Yes or No; Project Site, Project Site and Connecting off-site, and Rural	--	--

Mitigation Input Category	CAPCOA Mitigation Number	Include in Model? (yes/no)	Type of Input / Unit	Project Specific Inputs	
				Inputs	Source/Notes
Provide Traffic Calming Measures	SDT-2	No	% Streets with Improvement	--	--
		No	% Intersections with Improvement	--	--
Implement Neighborhood Electric Vehicle (NEV) Network	SDT-3	No	% of streets equipped with NEV network.	--	--
Limit Parking Supply	PDT-1	No	% Reduction in Spaces	--	--
Unbundled Parking Costs	PDT-2	No	Monthly Parking Costs (\$)	--	--
On-Street Market Pricing	PDT-3	No	% Increase in Price	--	--
Provide a Bus Rapid Transit System	TST-1	No	% Lines BRT	--	--
Expand Transit Network	TST-3	Yes	% Increase Transit Coverage	--	--
Increase Transit Frequency	TST-4	No	Level of Implementation	--	--
		No	% Reduction in Headways	--	--
Implement Trip Reduction Program	TRT-1, TRT-2	No	% employee eligible	--	--
		No	Program Type	--	--
Transit Subsidy	TRT-4	No	% employee eligible	--	--
		No	Daily Transit Subsidy Amount (\$)	--	--
Implement Employee Parking "Cash-Out"	TRT-15	No	% employee eligible	--	--
Workplace Parking Charge	TRT-14	No	% employee eligible	--	--
		No	Daily Parking Charge (\$)	--	--
Encourage Telecommuting and Alternative Work Schedules	TRT-6	No	% employee work 9/80	--	--
		No	% employee work 4/40	--	--

Mitigation Input Category	CAPCOA Mitigation Number	Include in Model? (yes/no)	Type of Input / Unit	Project Specific Inputs	
				Inputs	Source/Notes
		No	% employee telecommute 1.5 days	--	--
Market Commute Trip Reduction Option	TRT-7	No	% employee eligible	--	--
Employee Vanpool/Shuttle	TRT-11	Yes	% employee eligible	100	All employees are eligible for shuttles
		Yes	% vanpool mode share	2	Approximate percentage
Provide Ride Sharing Program	TRT-3	No	% employee eligible	--	--
Implement School Bus Program	TRT-13	No	% family using	--	--
Only Natural Gas Hearth	N/A	No	Yes or No	--	--
No hearth	N/A	No	Yes or No	--	--
Use of Low VOC Cleaning Supplies	N/A	No	Yes or No	--	--
Use low VOC Paint (Residential Interior)	N/A	Yes	Emission Factor (EF) (g/l)	--	
Use low VOC Paint (Residential Exterior)	N/A	Yes	EF (g/l)	--	
Use low VOC Paint (Non-residential Interior)	N/A	Yes	EF (g/l)	150 EF (g/L)	Use of low-VOC coatings per SMAQMD Rule 442.
Use low VOC Paint (Non-residential Exterior)	N/A	Yes	EF (g/l)	150 EF (g/L)	Use of low-VOC coatings per SMAQMD Rule 442.
Electric Lawnmower	A-1	Yes	Percent of equipment type that will be electric.	--	--
Electric Leafblower	A-1	Yes	Percent of equipment type that will be electric.	--	--
Electric Chainsaw	A-1	Yes	Percent of equipment type that will be electric.	--	--

Mitigation Input Category	CAPCOA Mitigation Number	Include in Model? (yes/no)	Type of Input / Unit	Project Specific Inputs	
				Inputs	Source/Notes
Exceed Title 24	BE-1	Yes	Percentage improvement selected for the Project.	--	--
Install High Efficiently Lighting	LE-1	Yes	% Lighting Energy Reduction	75%	
On-site Renewable Energy	AE-1, AE-2, AE-3	No	kWh Generated	--	--
		No	% of Electricity Use Generated	--	--
Energy Efficient Appliances	BE-4	Yes	Appliance Type, Land Use Subtype, % Improvement	See Table 10	See Table 11
Apply Water Conservation Strategy	WUW-2	No	% Reduction Indoor	--	--
		No	% Reduction Outdoor	--	--
Use Reclaimed Water	WSW-1	No	% Indoor Water Use	30%	--
		No	% Outdoor Water Use	30%	--
Use Grey Water	WSW-2	No	% Indoor Water Use	--	--
		No	% Outdoor Water Use	--	--
Install Low-Flow Bathroom Faucet	WUW-1	Yes	% Reduction in flow	32%	Default % reduction assuming implementation of Recommended Mitigation
Install Low-flow Kitchen Faucet	WUW-1	Yes	% Reduction in flow	18%	Default % reduction assuming implementation of Recommended Mitigation.
Install Low-flow Toilet	WUW-1	Yes	% Reduction in flow	20%	Default % reduction assuming implementation of Recommended Mitigation
Install Low-flow Shower	WUW-1	Yes	% Reduction in flow	20%	Default % reduction assuming implementation of Recommended Mitigation
Turf Reduction	WUW-5	No	Turf Reduction Area (sqft)	--	--
		No	% Reduction turf	--	--
Use Water-Efficient Irrigation Systems	WUW-4	No	% Reduction	--	--
Water Efficient Landscape	WUW-3	No	Maximum Applied Water Allowance (MAWA) (gal/yr)	--	--
		No	Estimated Total Water Use (ETWU) (gal/yr)	--	--

Mitigation Input Category	CAPCOA Mitigation Number	Include in Model? (yes/no)	Type of Input / Unit	Project Specific Inputs	
				Inputs	Source/Notes
Institute Recycling and Composting Service	SW-1	Yes	% Reduction in Waste Disposal over State requirements	50%	Tribe will use County facility's which are required to divert 50 percent of waste from landfills

Source: AES, 2018; CalEEMod, 2016.3.2.

Table 1 – Land Use Inputs

Land Use Type	Land Use Subtype	Unit Amount	Size Metric	Lot Acreage ¹	Square Feet	Population	Indoor Water Demand (gal/yr) ²	Outdoor Water Demand (gal/yr) ²
Recreation	User Defined (Casino)	110.26	User Defined	4.42 ³	374,738	13,563 ⁴	31,025,000	
Recreation	Movie Theater	2,998	Seats	1.00	44,978	2,998	6,205,000	
Recreation	Hotel	300	Rooms	1.14	225,280	600	86,870,000	2,000,000
Parking	Surface	1,514	Spaces	26.22	1,142,142	0		
Parking	Garage/Structure	1,701	Spaces	3.15	411,642	0		

¹ Lot acreage determined using original revised site plan.

² Indoor water demand distributed as follows: 70 percent Hotel, 25 percent casino, and five percent conference center (Movie Theater). Outdoor water demand attributed to hotel.

³ Includes public spaces, restrooms, restaurants.

⁴ Population based off of weekday daily trips from the 2014 TIS (9,041) and an average vehicle occupancy of 1.5.

Source: Kimley-Horn, 2014 Traffic Impact Study; Section 2.0 of the FEIS; Water & Wastewater Feasibility Study, Summit, 2015.

Table 2 – Construction Equipment Usage

Equipment	Total No.	Construction Phase Activities					
		Site Preparation	Grading	Construction	Paving	Architectural Coating	Paving II
	Dates	5/1/18-11/1/18	7/15/18-1/15/2019	9/15/18-10/15/2019	11/15/18-1/15/19	11/1/18-10/31/19	9/1/19-10/20/19
Air Compressors	5			1		4	
Cement and Mortar Mixers	2			2			
Concrete/Industrial Saws	2			2			
Cranes	2			2			
Crawler Tractors	3	2	1				
Excavators	2		2				
Forklifts	4			4			
Gensets	1			1			
Graders	2	1	1				
Off-Highway Trucks	2	2					
Other General Industrial Equipment	2					2	
Other Material Handling Equipment	10	4	4	2			
Pavers	3				2		1
Paving Equipment	4				3		1
Rollers	3				2		1
Rough Terrain Forklifts	4			4			
Rubber Tired Dozers	5	3	2				
Rubber Tired Loaders	2			2			
Scrapers	2		2				
Sweepers/Scrubbers	1			1			
Tractors/Loaders/Backhoes	7	4	2	1			
Trenchers	2	2					
Welders	2			2			
Two-way Trips per Construction Phase¹		35	32	261	18	51	8

¹ Includes fill haul trips and material delivery trips.

Source: Model defaults and 7,000 cubic yard (cy) of imported fill at 16 cy per truck for 132 days.

Table 3 - Trip Generation Rates¹

Land Use	Daily Trip Generation Rate ¹		Trip Length (miles)			Trip Purpose %			Trip %		
	Weekday/ Sunday	Weekend	C-C	C-W	C-NW	Primary	Diverted ²	Pass- B	C-C	C-W	C-NW
Casino (User Defined)	82.00 trips/1,000 sqft	131.44 trips/1,000 sqft	30.30	30.40	30.40	90	10	0	80	20	0
Movie Theater	0.496 trips/seat ²	0.496 trips/seat ²	30.30	30.40	30.40	100	0	0	79.20	1.80	19
Hotel	2.04 trips/room	2.05 trips/room	30.30	30.40	30.40	100	0	0	61.60	19.40	19

Notes:

¹ – Kimley-Horn, 2014 Traffic Impact Study.

² – The daily trip generation rate for the conference center (“Movie Theater”) is based off of the 2014 TIS value (0.744); however, a 30% reduction in trips for the conference center is taken into consideration to assume that this land use will not be used daily. The trip generation rate, as opposed to the number of seats, was adjusted in CalEEMod to account for the 30% reduction.

Table 4 – Off-Road Equipment Mitigation Inputs

Equipment Type	Engine Tier	Number of Equipment Mitigated	Diesel Particulate Filter (DPF) Level 2014
Air Compressors	Tier 3	5	Level 3
Cement and Mortar Mixers	Tier 3	2	Level 3
Concrete/Industrial Saws	Tier 3	2	Level 3
Cranes	Tier 3	2	Level 3
Crawler Tractors	Tier 3	3	Level 3
Excavators	Tier 3	2	Level 3
Forklifts	Tier 3	4	Level 3
Gensets	Tier 3	1	Level 3
Graders	Tier 3	2	Level 3
Off-Highway Trucks	Tier 3	2	Level 3
Other General Industrial Equipment	Tier 3	2	Level 3
Other Material Handling Equipment	Tier 3	10	Level 3
Pavers	Tier 3	3	Level 3
Paving Equipment	Tier 3	4	Level 3
Rollers	Tier 3	3	Level 3
Rough Terrain Forklifts	Tier 3	4	Level 3
Rubber Tired Dozers	Tier 3	5	Level 3
Rubber Tired Loaders	Tier 3	2	Level 3
Scrapers	No Change	2	No Change
Sweepers/Scrubbers	Tier 3	1	Level 3
Tractors/Loaders/Backhoes	Tier 3	7	Level 3
Trenchers	Tier 3	2	Level 3
Welders	Tier 3	2	Level 3

Table 5 – Energy Use

Land Use Subtype	Title-24 Electricity Energy Intensity (KWhr/size/yr)	Nontitle-24 Electricity Energy Intensity (KWhr/size/yr)	Lighting Energy Intensity (KWhr/size/yr)	Title-24 Natural Gas Intensity (KBtu/size/yr)	Non-title-24 Natural Gas Intensity (KBtu/size/yr)
Casino ¹	--	6.44	--	--	18.27
Movie Theater	Default	Default	Default	Default	Default
Hotel	Default	Default	Default	Default	Default
Parking Structure	Default	Default	Default	Default	Default
Parking Lot	Default	Default	Default	Default	Default

¹ Based on similar sized casino/hotel projects

Source: CalEEMod, 2016, Version 2016.3.2; other casino projects.

Table 6 – Stationary Sources

Land Use Subtype	Number of Units	Hour/Heat Input/Day	Hours/Heat Input/Year	Size (hp)/Rating	Emissions Factors	Load Factor	Fuel Type
Emergency Generators	3	0	30	2,923	Default	0.73	Diesel
Boilers	3	12	4,380	0.5	Default	N/A	CNG

Source: Based on similar sized casino/hotel projects.

CALEEMOD OUTPUT FILES

Revised Wilton Alternative F - Sacramento County, Annual

**Revised Wilton Alternative F
Sacramento County, Annual**

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	1,701.00	Space	3.15	411,642.00	0
Parking Lot	1,514.00	Space	26.22	1,142,143.00	0
Hotel	300.00	Room	1.14	225,280.00	600
Movie Theater (No Matinee)	2,998.00	Seat	1.00	44,978.00	2998
User Defined Recreational	110.26	User Defined Unit	4.42	374,738.00	13563

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	3.5	Precipitation Freq (Days)	58
Climate Zone	6			Operational Year	2020
Utility Company	Sacramento Municipal Utility District				
CO2 Intensity (lb/MW hr)	590.31	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Revised Wilton Alternative F - Sacramento County, Annual

Project Characteristics -

Land Use - Refer to CalEEMod Inputs Table 1.

Construction Phase - CalEEMod Inputs Table 2.

Off-road Equipment - CalEEMod Inputs Table 2.

Off-road Equipment - CalEEMod Inputs Table 2.

Off-road Equipment - CalEEMod Inputs Table 2.

Off-road Equipment - CalEEMod Inputs Table 2.

Off-road Equipment - CalEEMod Inputs Table 2.

Off-road Equipment - CalEEMod Inputs Table 2.

Grading - CalEEMod Input Tables

Vehicle Trips - CalEEMod Inputs Table 3.

Energy Use - CalEEMod Inputs Table 5.

Water And Wastewater - CalEEMod Inputs Table 1.

Solid Waste - Table 4.10-6 of FEIS, 312 tons/year - 50% split between the hotel and casino for modeling purposes.

Construction Off-road Equipment Mitigation - Project-Mitigation Inputs for the Wilton Casino

Mobile Commute Mitigation - Project-Mitigation Inputs for the Wilton Casino

Energy Mitigation -

Water Mitigation -

Waste Mitigation -

Stationary Sources - Emergency Generators and Fire Pumps - CalEEMod Inputs Table 6.

Stationary Sources - Process Boilers - CalEEMod Inputs Table 6.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Parking	93,227.00	76,761.00
tblAreaCoating	Area_Parking	93227	76761
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	DPF	No Change	Level 3

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tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
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tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	DPF	No Change	Level 3
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00

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tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstructionPhase	NumDays	55.00	261.00
tblConstructionPhase	NumDays	740.00	282.00
tblConstructionPhase	NumDays	75.00	132.00
tblConstructionPhase	NumDays	55.00	44.00
tblConstructionPhase	NumDays	55.00	35.00
tblConstructionPhase	NumDays	30.00	133.00
tblEnergyUse	NT24E	0.00	6.44
tblEnergyUse	NT24NG	0.00	18.27
tblGrading	AcresOfGrading	396.00	187.50
tblGrading	AcresOfGrading	199.50	0.00
tblGrading	MaterialImported	0.00	7,000.00
tblLandUse	LandUseSquareFeet	680,400.00	411,642.00
tblLandUse	LandUseSquareFeet	605,600.00	1,142,143.00
tblLandUse	LandUseSquareFeet	435,600.00	225,280.00
tblLandUse	LandUseSquareFeet	67,455.00	44,978.00
tblLandUse	LandUseSquareFeet	0.00	374,738.00
tblLandUse	LotAcreage	15.31	3.15
tblLandUse	LotAcreage	13.63	26.22
tblLandUse	LotAcreage	10.00	1.14
tblLandUse	LotAcreage	1.55	1.00
tblLandUse	LotAcreage	0.00	4.42
tblLandUse	Population	0.00	600.00
tblLandUse	Population	0.00	2,998.00
tblLandUse	Population	0.00	13,563.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00

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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	164.25	156.00
tblSolidWaste	SolidWasteGenerationRate	0.00	156.00
tblStationaryBoilersUse	AnnualHeatInput	0.00	4,380.00
tblStationaryBoilersUse	BoilerRatingValue	0.00	0.50
tblStationaryBoilersUse	DailyHeatInput	0.00	12.00
tblStationaryBoilersUse	NumberOfEquipment	0.00	3.00
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	2,923.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	30.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	3.00
tblTripsAndVMT	VendorTripNumber	360.00	315.00
tblTripsAndVMT	WorkerTripNumber	923.00	808.00
tblTripsAndVMT	WorkerTripNumber	185.00	162.00
tblVehicleTrips	CC_TL	7.50	0.00
tblVehicleTrips	CC_TL	7.50	30.30
tblVehicleTrips	CC_TL	7.50	30.30
tblVehicleTrips	CC_TL	7.50	0.00
tblVehicleTrips	CC_TL	7.50	30.30

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tblVehicleTrips	CC_TTP	0.00	80.00
tblVehicleTrips	CNW_TL	8.50	0.00
tblVehicleTrips	CNW_TL	8.50	30.40
tblVehicleTrips	CNW_TL	8.50	30.40
tblVehicleTrips	CNW_TL	8.50	0.00
tblVehicleTrips	CNW_TL	8.50	30.40
tblVehicleTrips	CW_TL	15.00	0.00
tblVehicleTrips	CW_TL	15.00	30.40
tblVehicleTrips	CW_TL	15.00	30.40
tblVehicleTrips	CW_TL	15.00	0.00
tblVehicleTrips	CW_TL	15.00	30.40
tblVehicleTrips	CW_TTP	0.00	20.00
tblVehicleTrips	DV_TP	38.00	0.00
tblVehicleTrips	DV_TP	17.00	0.00
tblVehicleTrips	DV_TP	0.00	10.00
tblVehicleTrips	PB_TP	4.00	0.00
tblVehicleTrips	PB_TP	17.00	0.00
tblVehicleTrips	PR_TP	58.00	100.00
tblVehicleTrips	PR_TP	66.00	100.00
tblVehicleTrips	PR_TP	0.00	90.00
tblVehicleTrips	ST_TR	8.19	2.05
tblVehicleTrips	ST_TR	2.24	0.50
tblVehicleTrips	ST_TR	0.00	134.44
tblVehicleTrips	SU_TR	5.95	2.04
tblVehicleTrips	SU_TR	1.85	0.50
tblVehicleTrips	SU_TR	0.00	82.00
tblVehicleTrips	WD_TR	8.17	2.04

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tblVehicleTrips	WD_TR	1.76	0.50
tblVehicleTrips	WD_TR	0.00	82.00
tblWater	IndoorWaterUseRate	7,610,031.00	86,870,000.00
tblWater	IndoorWaterUseRate	27,090,026.60	6,205,000.00
tblWater	IndoorWaterUseRate	0.00	31,025,000.00
tblWater	OutdoorWaterUseRate	845,559.00	2,000,000.00

2.0 Emissions Summary

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	5-1-2018	7-31-2018	4.7188	2.4015
2	8-1-2018	10-31-2018	9.8461	6.0693
3	11-1-2018	1-31-2019	9.1156	7.0433
4	2-1-2019	4-30-2019	5.1509	4.4576
5	5-1-2019	7-31-2019	5.2777	4.5610
6	8-1-2019	9-30-2019	3.6107	3.1095
		Highest	9.8461	7.0433

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	2.9442	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754
Energy	0.0925	0.8405	0.7060	5.0400e-003		0.0639	0.0639		0.0639	0.0639	0.0000	3,088.0714	3,088.0714	0.1243	0.0389	3,102.7597
Mobile	8.6195	50.5974	161.0946	0.5401	46.2840	0.5615	46.8455	12.4138	0.5283	12.9422	0.0000	49,609.5619	49,609.5619	2.2589	0.0000	49,666.0338
Stationary	0.2513	1.1230	1.1816	4.9000e-003		0.0807	0.0807		0.0807	0.0807	0.0000	801.3887	801.3887	0.0275	0.0000	802.0759
Waste						0.0000	0.0000		0.0000	0.0000	63.3332	0.0000	63.3332	3.7429	0.0000	156.9053
Water						0.0000	0.0000		0.0000	0.0000	43.9068	169.0618	212.9686	0.1594	0.0972	245.9202
Total	11.9075	52.5616	163.0673	0.5501	46.2840	0.7064	46.9904	12.4138	0.6732	13.0871	107.2400	53,668.2481	53,775.4881	6.3134	0.1361	53,973.8702

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2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	2.9442	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754
Energy	0.0925	0.8405	0.7060	5.0400e-003		0.0639	0.0639		0.0639	0.0639	0.0000	2,691.5562	2,691.5562	0.1048	0.0348	2,704.5566
Mobile	8.5423	50.0332	159.1682	0.5333	45.6860	0.5545	46.2405	12.2534	0.5217	12.7751	0.0000	48,978.0814	48,978.0814	2.2314	0.0000	49,033.8672
Stationary	0.2513	1.1230	1.1816	4.9000e-003		0.0807	0.0807		0.0807	0.0807	0.0000	801.3887	801.3887	0.0275	0.0000	802.0759
Waste						0.0000	0.0000		0.0000	0.0000	31.6666	0.0000	31.6666	1.8714	0.0000	78.4526
Water						0.0000	0.0000		0.0000	0.0000	30.9104	119.6346	150.5450	0.1123	0.0684	173.7455
Total	11.8302	51.9974	161.1410	0.5432	45.6860	0.6994	46.3854	12.2534	0.6666	12.9200	62.5770	52,590.8253	52,653.4022	4.3479	0.1033	52,792.8731

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.65	1.07	1.18	1.25	1.29	1.00	1.29	1.29	0.98	1.28	41.65	2.01	2.09	31.13	24.10	2.19

3.0 Construction Detail

Construction Phase

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	5/1/2018	11/1/2018	5	133	
2	Grading	Grading	7/15/2018	1/15/2019	5	132	
3	Building Construction	Building Construction	9/15/2018	10/15/2019	5	282	
4	Architectural Coating	Architectural Coating	11/1/2018	10/31/2019	5	261	
5	Paving	Paving	11/15/2018	1/15/2019	5	44	
6	Paving II	Paving	9/1/2019	10/20/2019	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 187.5

Acres of Paving: 29.37

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 967,494; Non-Residential Outdoor: 322,498; Striped Parking Area: 76,761 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Crawler Tractors	2	8.00	212	0.43
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Off-Highway Trucks	2	8.00	402	0.38
Site Preparation	Other Material Handling Equipment	4	8.00	168	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Site Preparation	Trenchers	2	8.00	78	0.50
Grading	Crawler Tractors	1	8.00	212	0.43
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41

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Grading	Other Material Handling Equipment	4	8.00	168	0.40
Grading	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Air Compressors	1	8.00	78	0.48
Building Construction	Cement and Mortar Mixers	2	8.00	9	0.56
Building Construction	Concrete/Industrial Saws	2	8.00	81	0.73
Building Construction	Cranes	2	7.00	231	0.29
Building Construction	Forklifts	4	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Other Material Handling Equipment	2	8.00	168	0.40
Building Construction	Rough Terrain Forklifts	4	8.00	100	0.40
Building Construction	Rubber Tired Loaders	2	8.00	203	0.36
Building Construction	Sweepers/Scrubbers	1	8.00	64	0.46
Building Construction	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Architectural Coating	Air Compressors	4	6.00	78	0.48
Architectural Coating	Other General Industrial Equipment	2	8.00	88	0.34
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	3	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Paving II	Pavers	1	8.00	130	0.42
Paving II	Paving Equipment	1	8.00	132	0.36
Paving II	Rollers	1	8.00	80	0.38

Trips and VMT

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Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	18	45.00	0.00	0.00	15.00	8.50	20.00	LD_Mix	HDT_Mix	HHDT
Grading	14	35.00	0.00	875.00	15.00	8.50	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	24	808.00	315.00	0.00	15.00	8.50	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	6	162.00	0.00	0.00	15.00	8.50	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	15.00	8.50	20.00	LD_Mix	HDT_Mix	HHDT
Paving II	3	8.00	0.00	0.00	15.00	8.50	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use DPF for Construction Equipment

Use Soil Stabilizer

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Site Preparation - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.2014	0.0000	1.2014	0.6604	0.0000	0.6604	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.6891	7.5092	3.9016	7.7600e-003		0.3655	0.3655		0.3363	0.3363	0.0000	708.6434	708.6434	0.2206	0.0000	714.1587
Total	0.6891	7.5092	3.9016	7.7600e-003	1.2014	0.3655	1.5670	0.6604	0.3363	0.9967	0.0000	708.6434	708.6434	0.2206	0.0000	714.1587

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3.2 Site Preparation - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0180	0.0138	0.1437	3.4000e-004	0.0330	2.4000e-004	0.0332	8.7600e-003	2.2000e-004	8.9800e-003	0.0000	30.8712	30.8712	1.0100e-003	0.0000	30.8965
Total	0.0180	0.0138	0.1437	3.4000e-004	0.0330	2.4000e-004	0.0332	8.7600e-003	2.2000e-004	8.9800e-003	0.0000	30.8712	30.8712	1.0100e-003	0.0000	30.8965

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.5406	0.0000	0.5406	0.2972	0.0000	0.2972	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1902	3.7860	4.7532	7.7600e-003		0.0261	0.0261		0.0261	0.0261	0.0000	708.6426	708.6426	0.2206	0.0000	714.1578
Total	0.1902	3.7860	4.7532	7.7600e-003	0.5406	0.0261	0.5667	0.2972	0.0261	0.3233	0.0000	708.6426	708.6426	0.2206	0.0000	714.1578

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3.2 Site Preparation - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0180	0.0138	0.1437	3.4000e-004	0.0330	2.4000e-004	0.0332	8.7600e-003	2.2000e-004	8.9800e-003	0.0000	30.8712	30.8712	1.0100e-003	0.0000	30.8965
Total	0.0180	0.0138	0.1437	3.4000e-004	0.0330	2.4000e-004	0.0332	8.7600e-003	2.2000e-004	8.9800e-003	0.0000	30.8712	30.8712	1.0100e-003	0.0000	30.8965

3.3 Grading - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8288	0.0000	0.8288	0.4114	0.0000	0.4114	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.5109	5.8312	3.4715	6.1400e-003		0.2652	0.2652		0.2440	0.2440	0.0000	560.9635	560.9635	0.1746	0.0000	565.3294
Total	0.5109	5.8312	3.4715	6.1400e-003	0.8288	0.2652	1.0941	0.4114	0.2440	0.6554	0.0000	560.9635	560.9635	0.1746	0.0000	565.3294

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3.3 Grading - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.8500e-003	0.1327	0.0336	3.2000e-004	7.2300e-003	5.8000e-004	7.8100e-003	1.9700e-003	5.5000e-004	2.5300e-003	0.0000	31.3514	31.3514	1.8800e-003	0.0000	31.3984
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0127	9.7500e-003	0.1017	2.4000e-004	0.0233	1.7000e-004	0.0235	6.2000e-003	1.6000e-004	6.3600e-003	0.0000	21.8445	21.8445	7.2000e-004	0.0000	21.8624
Total	0.0166	0.1425	0.1353	5.6000e-004	0.0306	7.5000e-004	0.0313	8.1700e-003	7.1000e-004	8.8900e-003	0.0000	53.1959	53.1959	2.6000e-003	0.0000	53.2609

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3730	0.0000	0.3730	0.1851	0.0000	0.1851	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2446	3.7944	3.8957	6.1400e-003		0.0820	0.0820		0.0766	0.0766	0.0000	560.9629	560.9629	0.1746	0.0000	565.3287
Total	0.2446	3.7944	3.8957	6.1400e-003	0.3730	0.0820	0.4550	0.1851	0.0766	0.2617	0.0000	560.9629	560.9629	0.1746	0.0000	565.3287

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3.3 Grading - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.8500e-003	0.1327	0.0336	3.2000e-004	7.2300e-003	5.8000e-004	7.8100e-003	1.9700e-003	5.5000e-004	2.5300e-003	0.0000	31.3514	31.3514	1.8800e-003	0.0000	31.3984
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0127	9.7500e-003	0.1017	2.4000e-004	0.0233	1.7000e-004	0.0235	6.2000e-003	1.6000e-004	6.3600e-003	0.0000	21.8445	21.8445	7.2000e-004	0.0000	21.8624
Total	0.0166	0.1425	0.1353	5.6000e-004	0.0306	7.5000e-004	0.0313	8.1700e-003	7.1000e-004	8.8900e-003	0.0000	53.1959	53.1959	2.6000e-003	0.0000	53.2609

3.3 Grading - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1664	0.0000	0.1664	0.0473	0.0000	0.0473	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0430	0.4826	0.3044	5.6000e-004		0.0216	0.0216		0.0199	0.0199	0.0000	50.1506	50.1506	0.0159	0.0000	50.5472
Total	0.0430	0.4826	0.3044	5.6000e-004	0.1664	0.0216	0.1880	0.0473	0.0199	0.0672	0.0000	50.1506	50.1506	0.0159	0.0000	50.5472

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3.3 Grading - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.2000e-004	0.0113	2.7400e-003	3.0000e-005	5.7100e-003	5.0000e-005	5.7500e-003	1.4200e-003	5.0000e-005	1.4600e-003	0.0000	2.8189	2.8189	1.7000e-004	0.0000	2.8231
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0500e-003	7.8000e-004	8.2800e-003	2.0000e-005	2.1200e-003	2.0000e-005	2.1300e-003	5.6000e-004	1.0000e-005	5.8000e-004	0.0000	1.9183	1.9183	6.0000e-005	0.0000	1.9197
Total	1.3700e-003	0.0121	0.0110	5.0000e-005	7.8300e-003	7.0000e-005	7.8800e-003	1.9800e-003	6.0000e-005	2.0400e-003	0.0000	4.7372	4.7372	2.3000e-004	0.0000	4.7428

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0749	0.0000	0.0749	0.0213	0.0000	0.0213	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0213	0.3309	0.3462	5.6000e-004		6.8700e-003	6.8700e-003		6.4200e-003	6.4200e-003	0.0000	50.1505	50.1505	0.0159	0.0000	50.5472
Total	0.0213	0.3309	0.3462	5.6000e-004	0.0749	6.8700e-003	0.0817	0.0213	6.4200e-003	0.0277	0.0000	50.1505	50.1505	0.0159	0.0000	50.5472

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3.3 Grading - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.2000e-004	0.0113	2.7400e-003	3.0000e-005	5.7100e-003	5.0000e-005	5.7500e-003	1.4200e-003	5.0000e-005	1.4600e-003	0.0000	2.8189	2.8189	1.7000e-004	0.0000	2.8231
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0500e-003	7.8000e-004	8.2800e-003	2.0000e-005	2.1200e-003	2.0000e-005	2.1300e-003	5.6000e-004	1.0000e-005	5.8000e-004	0.0000	1.9183	1.9183	6.0000e-005	0.0000	1.9197
Total	1.3700e-003	0.0121	0.0110	5.0000e-005	7.8300e-003	7.0000e-005	7.8800e-003	1.9800e-003	6.0000e-005	2.0400e-003	0.0000	4.7372	4.7372	2.3000e-004	0.0000	4.7428

3.4 Building Construction - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2835	2.6029	1.9626	3.3800e-003		0.1448	0.1448		0.1371	0.1371	0.0000	298.7779	298.7779	0.0731	0.0000	300.6051
Total	0.2835	2.6029	1.9626	3.3800e-003		0.1448	0.1448		0.1371	0.1371	0.0000	298.7779	298.7779	0.0731	0.0000	300.6051

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3.4 Building Construction - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0771	1.7903	0.5840	3.7400e-003	0.0915	0.0157	0.1071	0.0264	0.0150	0.0414	0.0000	358.0550	358.0550	0.0209	0.0000	358.5773
Worker	0.1843	0.1414	1.4742	3.5100e-003	0.3381	2.4700e-003	0.3406	0.0899	2.2800e-003	0.0922	0.0000	316.7479	316.7479	0.0104	0.0000	317.0078
Total	0.2613	1.9317	2.0582	7.2500e-003	0.4296	0.0181	0.4477	0.1163	0.0173	0.1336	0.0000	674.8029	674.8029	0.0313	0.0000	675.5850

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1329	1.7577	2.1873	3.3800e-003		0.0380	0.0380		0.0380	0.0380	0.0000	298.7776	298.7776	0.0731	0.0000	300.6048
Total	0.1329	1.7577	2.1873	3.3800e-003		0.0380	0.0380		0.0380	0.0380	0.0000	298.7776	298.7776	0.0731	0.0000	300.6048

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3.4 Building Construction - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0771	1.7903	0.5840	3.7400e-003	0.0915	0.0157	0.1071	0.0264	0.0150	0.0414	0.0000	358.0550	358.0550	0.0209	0.0000	358.5773
Worker	0.1843	0.1414	1.4742	3.5100e-003	0.3381	2.4700e-003	0.3406	0.0899	2.2800e-003	0.0922	0.0000	316.7479	316.7479	0.0104	0.0000	317.0078
Total	0.2613	1.9317	2.0582	7.2500e-003	0.4296	0.0181	0.4477	0.1163	0.0173	0.1336	0.0000	674.8029	674.8029	0.0313	0.0000	675.5850

3.4 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.6852	6.3616	5.2240	9.1600e-003		0.3391	0.3391		0.3210	0.3210	0.0000	800.8713	800.8713	0.1955	0.0000	805.7584
Total	0.6852	6.3616	5.2240	9.1600e-003		0.3391	0.3391		0.3210	0.3210	0.0000	800.8713	800.8713	0.1955	0.0000	805.7584

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3.4 Building Construction - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1842	4.5602	1.3825	0.0100	0.2479	0.0363	0.2841	0.0716	0.0347	0.1063	0.0000	963.3126	963.3126	0.0545	0.0000	964.6748
Worker	0.4536	0.3372	3.5778	9.1800e-003	0.9164	6.4900e-003	0.9229	0.2437	5.9900e-003	0.2497	0.0000	829.3251	829.3251	0.0249	0.0000	829.9464
Total	0.6378	4.8974	4.9602	0.0192	1.1643	0.0428	1.2071	0.3153	0.0407	0.3560	0.0000	1,792.6377	1,792.6377	0.0793	0.0000	1,794.6212

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.3378	4.6946	5.9139	9.1600e-003		0.0934	0.0934		0.0934	0.0934	0.0000	800.8703	800.8703	0.1955	0.0000	805.7574
Total	0.3378	4.6946	5.9139	9.1600e-003		0.0934	0.0934		0.0934	0.0934	0.0000	800.8703	800.8703	0.1955	0.0000	805.7574

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3.4 Building Construction - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1842	4.5602	1.3825	0.0100	0.2479	0.0363	0.2841	0.0716	0.0347	0.1063	0.0000	963.3126	963.3126	0.0545	0.0000	964.6748
Worker	0.4536	0.3372	3.5778	9.1800e-003	0.9164	6.4900e-003	0.9229	0.2437	5.9900e-003	0.2497	0.0000	829.3251	829.3251	0.0249	0.0000	829.9464
Total	0.6378	4.8974	4.9602	0.0192	1.1643	0.0428	1.2071	0.3153	0.0407	0.3560	0.0000	1,792.6377	1,792.6377	0.0793	0.0000	1,794.6212

3.5 Architectural Coating - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5218					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0383	0.2849	0.2474	3.7000e-004		0.0218	0.0218		0.0211	0.0211	0.0000	32.0092	32.0092	5.2200e-003	0.0000	32.1396
Total	0.5602	0.2849	0.2474	3.7000e-004		0.0218	0.0218		0.0211	0.0211	0.0000	32.0092	32.0092	5.2200e-003	0.0000	32.1396

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3.5 Architectural Coating - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0209	0.0160	0.1672	4.0000e-004	0.0384	2.8000e-004	0.0386	0.0102	2.6000e-004	0.0105	0.0000	35.9312	35.9312	1.1800e-003	0.0000	35.9607
Total	0.0209	0.0160	0.1672	4.0000e-004	0.0384	2.8000e-004	0.0386	0.0102	2.6000e-004	0.0105	0.0000	35.9312	35.9312	1.1800e-003	0.0000	35.9607

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5218					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0284	0.2347	0.2434	3.7000e-004		0.0136	0.0136		0.0136	0.0136	0.0000	32.0092	32.0092	5.2200e-003	0.0000	32.1395
Total	0.5503	0.2347	0.2434	3.7000e-004		0.0136	0.0136		0.0136	0.0136	0.0000	32.0092	32.0092	5.2200e-003	0.0000	32.1395

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3.5 Architectural Coating - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0209	0.0160	0.1672	4.0000e-004	0.0384	2.8000e-004	0.0386	0.0102	2.6000e-004	0.0105	0.0000	35.9312	35.9312	1.1800e-003	0.0000	35.9607
Total	0.0209	0.0160	0.1672	4.0000e-004	0.0384	2.8000e-004	0.0386	0.0102	2.6000e-004	0.0105	0.0000	35.9312	35.9312	1.1800e-003	0.0000	35.9607

3.5 Architectural Coating - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	2.6456					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1737	1.3175	1.2424	1.8500e-003		0.0956	0.0956		0.0924	0.0924	0.0000	161.4615	161.4615	0.0253	0.0000	162.0931
Total	2.8193	1.3175	1.2424	1.8500e-003		0.0956	0.0956		0.0924	0.0924	0.0000	161.4615	161.4615	0.0253	0.0000	162.0931

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3.5 Architectural Coating - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0962	0.0716	0.7591	1.9500e-003	0.1944	1.3800e-003	0.1958	0.0517	1.2700e-003	0.0530	0.0000	175.9615	175.9615	5.2700e-003	0.0000	176.0934
Total	0.0962	0.0716	0.7591	1.9500e-003	0.1944	1.3800e-003	0.1958	0.0517	1.2700e-003	0.0530	0.0000	175.9615	175.9615	5.2700e-003	0.0000	176.0934

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	2.6456					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1300	1.1154	1.2285	1.8500e-003		0.0595	0.0595		0.0595	0.0595	0.0000	161.4613	161.4613	0.0253	0.0000	162.0929
Total	2.7756	1.1154	1.2285	1.8500e-003		0.0595	0.0595		0.0595	0.0595	0.0000	161.4613	161.4613	0.0253	0.0000	162.0929

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3.5 Architectural Coating - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0962	0.0716	0.7591	1.9500e-003	0.1944	1.3800e-003	0.1958	0.0517	1.2700e-003	0.0530	0.0000	175.9615	175.9615	5.2700e-003	0.0000	176.0934
Total	0.0962	0.0716	0.7591	1.9500e-003	0.1944	1.3800e-003	0.1958	0.0517	1.2700e-003	0.0530	0.0000	175.9615	175.9615	5.2700e-003	0.0000	176.0934

3.6 Paving - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0310	0.3330	0.2860	4.4000e-004		0.0179	0.0179		0.0165	0.0165	0.0000	40.4764	40.4764	0.0126	0.0000	40.7914
Paving	0.0258					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0568	0.3330	0.2860	4.4000e-004		0.0179	0.0179		0.0165	0.0165	0.0000	40.4764	40.4764	0.0126	0.0000	40.7914

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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7800e-003	1.3700e-003	0.0143	3.0000e-005	3.2700e-003	2.0000e-005	3.2900e-003	8.7000e-004	2.0000e-005	8.9000e-004	0.0000	3.0639	3.0639	1.0000e-004	0.0000	3.0664
Total	1.7800e-003	1.3700e-003	0.0143	3.0000e-005	3.2700e-003	2.0000e-005	3.2900e-003	8.7000e-004	2.0000e-005	8.9000e-004	0.0000	3.0639	3.0639	1.0000e-004	0.0000	3.0664

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.2185	0.3365	4.4000e-004		1.7400e-003	1.7400e-003		1.7400e-003	1.7400e-003	0.0000	40.4763	40.4763	0.0126	0.0000	40.7913
Paving	0.0258					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0367	0.2185	0.3365	4.4000e-004		1.7400e-003	1.7400e-003		1.7400e-003	1.7400e-003	0.0000	40.4763	40.4763	0.0126	0.0000	40.7913

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7800e-003	1.3700e-003	0.0143	3.0000e-005	3.2700e-003	2.0000e-005	3.2900e-003	8.7000e-004	2.0000e-005	8.9000e-004	0.0000	3.0639	3.0639	1.0000e-004	0.0000	3.0664
Total	1.7800e-003	1.3700e-003	0.0143	3.0000e-005	3.2700e-003	2.0000e-005	3.2900e-003	8.7000e-004	2.0000e-005	8.9000e-004	0.0000	3.0639	3.0639	1.0000e-004	0.0000	3.0664

3.6 Paving - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.1700e-003	0.0963	0.0945	1.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	13.2737	13.2737	4.2000e-003	0.0000	13.3787
Paving	8.5900e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0178	0.0963	0.0945	1.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	13.2737	13.2737	4.2000e-003	0.0000	13.3787

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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.4000e-004	4.0000e-004	4.2600e-003	1.0000e-005	1.0900e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9865	0.9865	3.0000e-005	0.0000	0.9873
Total	5.4000e-004	4.0000e-004	4.2600e-003	1.0000e-005	1.0900e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9865	0.9865	3.0000e-005	0.0000	0.9873

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.6400e-003	0.0728	0.1122	1.5000e-004		5.8000e-004	5.8000e-004		5.8000e-004	5.8000e-004	0.0000	13.2737	13.2737	4.2000e-003	0.0000	13.3787
Paving	8.5900e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0122	0.0728	0.1122	1.5000e-004		5.8000e-004	5.8000e-004		5.8000e-004	5.8000e-004	0.0000	13.2737	13.2737	4.2000e-003	0.0000	13.3787

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.4000e-004	4.0000e-004	4.2600e-003	1.0000e-005	1.0900e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9865	0.9865	3.0000e-005	0.0000	0.9873
Total	5.4000e-004	4.0000e-004	4.2600e-003	1.0000e-005	1.0900e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9865	0.9865	3.0000e-005	0.0000	0.9873

3.7 Paving II - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0127	0.1334	0.1283	2.0000e-004		7.2200e-003	7.2200e-003		6.6400e-003	6.6400e-003	0.0000	17.9158	17.9158	5.6700e-003	0.0000	18.0575
Paving	0.0344					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0471	0.1334	0.1283	2.0000e-004		7.2200e-003	7.2200e-003		6.6400e-003	6.6400e-003	0.0000	17.9158	17.9158	5.6700e-003	0.0000	18.0575

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3.7 Paving II - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.6000e-004	5.7000e-004	6.0200e-003	2.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.3951	1.3951	4.0000e-005	0.0000	1.3961
Total	7.6000e-004	5.7000e-004	6.0200e-003	2.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.3951	1.3951	4.0000e-005	0.0000	1.3961

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	4.9100e-003	0.0988	0.1513	2.0000e-004		8.0000e-004	8.0000e-004		8.0000e-004	8.0000e-004	0.0000	17.9158	17.9158	5.6700e-003	0.0000	18.0575
Paving	0.0344					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0393	0.0988	0.1513	2.0000e-004		8.0000e-004	8.0000e-004		8.0000e-004	8.0000e-004	0.0000	17.9158	17.9158	5.6700e-003	0.0000	18.0575

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.6000e-004	5.7000e-004	6.0200e-003	2.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.3951	1.3951	4.0000e-005	0.0000	1.3961
Total	7.6000e-004	5.7000e-004	6.0200e-003	2.0000e-005	1.5400e-003	1.0000e-005	1.5500e-003	4.1000e-004	1.0000e-005	4.2000e-004	0.0000	1.3951	1.3951	4.0000e-005	0.0000	1.3961

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Employee Vanpool/Shuttle

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	8.5423	50.0332	159.1682	0.5333	45.6860	0.5545	46.2405	12.2534	0.5217	12.7751	0.0000	48,978.08 14	48,978.08 14	2.2314	0.0000	49,033.86 72
Unmitigated	8.6195	50.5974	161.0946	0.5401	46.2840	0.5615	46.8455	12.4138	0.5283	12.9422	0.0000	49,609.56 19	49,609.56 19	2.2589	0.0000	49,666.03 38

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Enclosed Parking with Elevator	0.00	0.00	0.00		
Hotel	612.00	615.00	612.00	6,763,157	6,689,785
Movie Theater (No Matinee)	1,499.00	1,499.00	1499.00	16,544,120	16,364,660
Parking Lot	0.00	0.00	0.00		
User Defined Recreational	9,041.32	14,823.35	9041.32	100,732,994	99,383,172
Total	11,152.32	16,937.35	11,152.32	124,040,272	122,437,617

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
Hotel	30.40	30.30	30.40	19.40	61.60	19.00	100	0	0
Movie Theater (No Matinee)	30.40	30.30	30.40	1.80	79.20	19.00	100	0	0
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0
User Defined Recreational	30.40	30.30	30.40	20.00	80.00	0.00	90	10	0

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4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Enclosed Parking with Elevator	0.551662	0.040953	0.203778	0.123762	0.021802	0.005583	0.018466	0.022043	0.002076	0.002280	0.006004	0.000618	0.000971
Hotel	0.551662	0.040953	0.203778	0.123762	0.021802	0.005583	0.018466	0.022043	0.002076	0.002280	0.006004	0.000618	0.000971
Movie Theater (No Matinee)	0.551662	0.040953	0.203778	0.123762	0.021802	0.005583	0.018466	0.022043	0.002076	0.002280	0.006004	0.000618	0.000971
Parking Lot	0.551662	0.040953	0.203778	0.123762	0.021802	0.005583	0.018466	0.022043	0.002076	0.002280	0.006004	0.000618	0.000971
User Defined Recreational	0.551662	0.040953	0.203778	0.123762	0.021802	0.005583	0.018466	0.022043	0.002076	0.002280	0.006004	0.000618	0.000971

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Install High Efficiency Lighting

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,776.5710	1,776.5710	0.0873	0.0181	1,784.1341
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,173.0862	2,173.0862	0.1068	0.0221	2,182.3372
NaturalGas Mitigated	0.0925	0.8405	0.7060	5.0400e-003		0.0639	0.0639		0.0639	0.0639	0.0000	914.9852	914.9852	0.0175	0.0168	920.4225
NaturalGas Unmitigated	0.0925	0.8405	0.7060	5.0400e-003		0.0639	0.0639		0.0639	0.0639	0.0000	914.9852	914.9852	0.0175	0.0168	920.4225

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5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas s Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	8.68905e +006	0.0469	0.4259	0.3578	2.5600e- 003		0.0324	0.0324		0.0324	0.0324	0.0000	463.6808	463.6808	8.8900e- 003	8.5000e- 003	466.4362
Movie Theater (No Matinee)	1.61066e +006	8.6800e- 003	0.0790	0.0663	4.7000e- 004		6.0000e- 003	6.0000e- 003		6.0000e- 003	6.0000e- 003	0.0000	85.9511	85.9511	1.6500e- 003	1.5800e- 003	86.4618
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	6.84646e +006	0.0369	0.3356	0.2819	2.0100e- 003		0.0255	0.0255		0.0255	0.0255	0.0000	365.3534	365.3534	7.0000e- 003	6.7000e- 003	367.5245
Total		0.0925	0.8405	0.7060	5.0400e- 003		0.0639	0.0639		0.0639	0.0639	0.0000	914.9852	914.9852	0.0175	0.0168	920.4225

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5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas s Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	8.68905e +006	0.0469	0.4259	0.3578	2.5600e- 003		0.0324	0.0324		0.0324	0.0324	0.0000	463.6808	463.6808	8.8900e- 003	8.5000e- 003	466.4362
Movie Theater (No Matinee)	1.61066e +006	8.6800e- 003	0.0790	0.0663	4.7000e- 004		6.0000e- 003	6.0000e- 003		6.0000e- 003	6.0000e- 003	0.0000	85.9511	85.9511	1.6500e- 003	1.5800e- 003	86.4618
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	6.84646e +006	0.0369	0.3356	0.2819	2.0100e- 003		0.0255	0.0255		0.0255	0.0255	0.0000	365.3534	365.3534	7.0000e- 003	6.7000e- 003	367.5245
Total		0.0925	0.8405	0.7060	5.0400e- 003		0.0639	0.0639		0.0639	0.0639	0.0000	914.9852	914.9852	0.0175	0.0168	920.4225

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5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Enclosed Parking with Elevator	2.41222e+006	645.8969	0.0317	6.5600e-003	648.6465
Hotel	2.20774e+006	591.1458	0.0290	6.0100e-003	593.6623
Movie Theater (No Matinee)	682766	182.8175	8.9800e-003	1.8600e-003	183.5958
Parking Lot	399750	107.0371	5.2600e-003	1.0900e-003	107.4928
User Defined Recreational	2.41331e+006	646.1889	0.0318	6.5700e-003	648.9398
Total		2,173.0862	0.1068	0.0221	2,182.3372

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5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Enclosed Parking with Elevator	1.87194e+006	501.2314	0.0246	5.0900e-003	503.3652
Hotel	1.72114e+006	460.8524	0.0226	4.6800e-003	462.8143
Movie Theater (No Matinee)	528604	141.5391	6.9500e-003	1.4400e-003	142.1416
Parking Lot	99937.5	26.7593	1.3100e-003	2.7000e-004	26.8732
User Defined Recreational	2.41331e+006	646.1889	0.0318	6.5700e-003	648.9398
Total		1,776.5710	0.0873	0.0181	1,784.1341

6.0 Area Detail

6.1 Mitigation Measures Area

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	2.9442	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754
Unmitigated	2.9442	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3168					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.6195					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.0000e-003	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754
Total	2.9442	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754

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6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3168					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.6195					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.0000e-003	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754
Total	2.9442	7.9000e-004	0.0851	1.0000e-005		3.1000e-004	3.1000e-004		3.1000e-004	3.1000e-004	0.0000	0.1644	0.1644	4.4000e-004	0.0000	0.1754

7.0 Water Detail

7.1 Mitigation Measures Water

Use Reclaimed Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	150.5450	0.1123	0.0684	173.7455
Unmitigated	212.9686	0.1594	0.0972	245.9202

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Hotel	86.87 / 2	148.5059	0.1116	0.0680	171.5697
Movie Theater (No Matinee)	6.205 / 1.72915	12.0942	8.0400e-003	4.8700e-003	13.7479
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	31.025 / 0	52.3684	0.0398	0.0243	60.6026
Total		212.9686	0.1594	0.0972	245.9202

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7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Hotel	61.1565 / 1.76	104.8781	0.0786	0.0479	121.1163
Movie Theater (No Matinee)	4.36832 / 1.52165	8.7995	5.6800e-003	3.4300e-003	9.9650
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	21.8416 / 0	36.8674	0.0280	0.0171	42.6643
Total		150.5450	0.1123	0.0684	173.7455

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

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Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	31.6666	1.8714	0.0000	78.4526
Unmitigated	63.3332	3.7429	0.0000	156.9053

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Hotel	156	31.6666	1.8714	0.0000	78.4526
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	156	31.6666	1.8714	0.0000	78.4526
Total		63.3332	3.7429	0.0000	156.9053

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8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Hotel	78	15.8333	0.9357	0.0000	39.2263
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
User Defined Recreational	78	15.8333	0.9357	0.0000	39.2263
Total		31.6666	1.8714	0.0000	78.4526

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	3	0	30	2923	0.73	Diesel

Boilers

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Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
Boiler	3	12	4380	0.5	CNG

User Defined Equipment

Equipment Type	Number
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10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Boiler - CNG (0 - 2 MMBTU)	0.0354	0.1577	0.6313	3.8600e-003		0.0490	0.0490		0.0490	0.0490	0.0000	701.2124	701.2124	0.0134	0.0000	701.5484
Emergency Generator - Diesel (750 - 9999 HP)	0.2159	0.9653	0.5504	1.0400e-003		0.0318	0.0318		0.0318	0.0318	0.0000	100.1763	100.1763	0.0140	0.0000	100.5274
Total	0.2513	1.1230	1.1816	4.9000e-003		0.0807	0.0807		0.0807	0.0807	0.0000	801.3887	801.3887	0.0275	0.0000	802.0759

11.0 Vegetation

ATTACHMENT C

Tribal Council Resolution No. 2018-26



Tribal Council Resolution No. 2018-26
RESOLUTION TO COMMIT TO COMPLY WITH MITIGATION MEASURES RELATED TO
GREENHOUSE GAS EMISSIONS

WHEREAS, the members of Wilton Rancheria ("Tribe") are the descendants of the Plains Miwok who lived and prospered in the Sacramento Valley since time immemorial; and

WHEREAS, Wilton Rancheria is a federally-recognized Indian tribe eligible for all rights and privileges afforded to recognized Native American tribes; and

WHEREAS, Wilton Rancheria adopted the Constitution of Wilton Rancheria ("Constitution") on November 12, 2011; and

WHEREAS, Article VI, Section 2(a) of the Constitution provides that the Tribal Council has the power to make all laws, including resolutions, codes, and statutes; and

WHEREAS, Article VI, Section 2(f) of the Constitution provides that the Tribal Council has the power to authorize expenditures by law and appropriate funds in an annual budget; and

WHEREAS, Section 1-201(A) of the Tribal Council Organization Act of 2012, 4 WRC § 1-101, et seq., provides that the Spokesperson of the Tribal Council is authorized to sign all official acts of the Tribal Council; and

WHEREAS, on December 14, 2016, the Bureau of Indian Affairs ("BIA") published a Notice of Availability, which stated that the Final Environmental Impact Statement ("FEIS") was available for public comment and that the BIA had chosen Alternative F in the FEIS, the Elk Grove Mall site as the agency's "Preferred Alternative" under the process required by the National Environmental Policy Act ("NEPA") and its implementing regulations; and

WHEREAS, on January 19, 2017, Department of the Interior Principal Deputy Assistant Secretary Larry Roberts, acting under delegation from the Secretary of the Department of the Interior ("Department"), signed a Record of Decision ("ROD") approving the application of the Tribe to have the Department accept the transfer of the Elk Grove Mall Site real property in trust for the Tribe to use for the development of a Tribal casino and hotel resort (the "2017 Approved Project"); and

WHEREAS, Attachment IV of the ROD contains a Mitigation Measure and Enforcement Plan (“MMEP”) that includes, among other things, a requirement that prior to the operation of the 2017 Approved Project the Tribe will purchase 31,015 metric tons (“MT”) of greenhouse gas (“GHG”) emission reduction credits (“ERCs”) to reduce project-related GHG emissions associated with the operation of the 2017 Approved Project to below 25,000 MT, and further stating that these GHG ERCs may be purchased from the Climate Action Reserve, the Verified Carbon Standard, the American Carbon Registry, and/or equivalent carbon ERCs trading markets that have the same or more stringent standards for carbon emissions reduction projects that reduce atmospheric GHGs or reflect direct GHG emissions reductions achieved by existing GHG emitters; and

WHEREAS, in early 2018, the Tribe proposed minor modifications to the 2017 Approved Project (the “2018 Modified Project”) and communicated the details of the 2018 Modified Project to the National Indian Gaming Commission (“NIGC”), which is reviewing the Tribe’s gaming management contract with BGM Co. Inc., an affiliate of Boyd Gaming Corporation, the Tribe’s casino developer; and

WHEREAS, on March 14, 2018, the Tribe, NIGC, and Analytical Environmental Services (“AES”) executed a Professional Services Agreement which would allow NIGC to direct AES to prepare the technical environmental documentation needed for NIGC to comply with NEPA to the extent required for the NIGC’s review and possible approval of the management contract; and

WHEREAS, at the request of NIGC, AES has prepared a draft Supplemental Information Report (“SIR”), which evaluates whether the proposed modifications in the 2018 Modified Project require NIGC to prepare a Supplemental Environmental Impact Statement (“SEIS); and

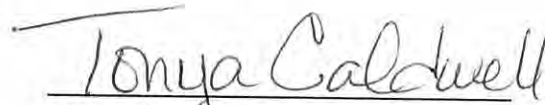
WHEREAS, the SIR concludes that the 2018 Modified Project may result in an increase in the GHG emissions when compared to the GHG emissions modeled for the operation of the 2017 Approved Project.

NOW BE IT THEREFORE RESOLVED, the Tribal Council hereby does formally commit to purchase prior to the operation of the 2018 Modified Project 81 MT of GHG ERCs from the Climate Action Reserve, the Verified Carbon Standard, the American Carbon Registry, and/or equivalent carbon ERCs trading markets that have the same or more stringent standards for carbon emissions reduction projects that reduce atmospheric GHGs or reflect direct GHG emissions reductions achieved by existing GHG emitters.

CERTIFICATION

It is hereby certified that the foregoing Resolution was adopted by an affirmative vote of 6 for, 0 against, and 0 abstaining, presented for approval on July 12, 2018, pursuant to the authority contained within the Constitution of Wilton Rancheria.

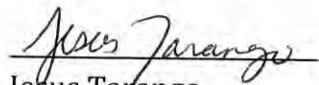
Dated this 12 day of July 2018.



Tonya Caldwell

Tribal Council Spokesperson

Attest:



Jesus Tarango

Vice Chairman