DRAFT Tribal Environmental Impact Report (TEIR)

for the

Viejas Casino & Resort Phase 3 Project

prepared for

VIEJAS

The Viejas Band of Kumeyaay Indians
5000 Willows Road
Alpine, CA 91901

prepared by

B·R·G

BRG Consulting, Inc.
304 Ivy Street
San Diego, CA 92101

August 2016

Draft

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Table of Contents

SECTION **PAGE NO.**

ACRONYMS A-1

SUMMARY S-1

1.0 INTRODUCTION 1-1
- 1.1 Project Objectives 1-1
- 1.2 Gaming Background Information 1-1
- 1.3 Intended Uses of this TEIR 1-2
- 1.4 Notice of Preparation 1-2

2.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING 2-1
- 2.1 Project Location 2-1
- 2.2 Project Description 2-1
- 2.3 Environmental Setting 2-9
- 2.4 Potential Cumulative Projects 2-9

3.0 SIGNIFICANT OFF-RESERVATION ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT THAT CAN BE MITIGATED 3-1

4.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT 4-1
- 4.1 Aesthetics 4-3
  - 4.1.1 Existing Conditions 4-3
  - 4.1.2 Guidelines for Significance 4-6
  - 4.1.3 Analysis of Project Effects & Determination of Significant Impacts 4-7
  - 4.1.4 Cumulative Impact Analysis 4-13
  - 4.1.5 Conclusions 4-13
  - 4.1.6 Mitigation Measures 4-13
- 4.2 Air Quality 4-15
  - 4.2.1 Existing Conditions 4-15
  - 4.2.2 Guidelines of Significance 4-19
  - 4.2.3 Analysis of Project Effects & Determination of Significant Impacts 4-21
  - 4.2.4 Cumulative Impact Analysis 4-24
  - 4.2.5 Conclusions 4-24
  - 4.2.6 Mitigation Measures 4-24
- 4.3 Groundwater Availability 4-27
  - 4.3.1 Existing Conditions 4-27
  - 4.3.2 Guidelines of Significance 4-32
  - 4.3.3 Analysis of Project Effects & Determination of Significant Impacts 4-32
  - 4.3.4 Cumulative Impact Analysis 4-35
  - 4.3.5 Conclusions 4-35
  - 4.3.6 Mitigation Measures 4-35

Table of Contents (continued)

SECTION			PAGE NO.
4.4	Noise		4-37
	4.4.1	Existing Conditions	4-37
	4.4.2	Guidelines of Significance	4-41
	4.4.3	Analysis of Project Effects & Determination of Significant Impacts	4-42
	4.4.4	Cumulative Impact Analysis	4-46
	4.4.5	Conclusions	4-47
	4.4.5	Mitigation Measures	4-47
4.5	Transportation/Traffic		4-49
	4.5.1	Existing Conditions	4-49
	4.5.2	Guidelines of Significance	4-54
	4.5.3	Analysis of Project Effects & Determination of Significant Impacts	4-55
	4.5.4	Cumulative Impact Analysis	4-63
	4.5.5	Conclusions	4-64
	4.5.6	Mitigation Measures	4-67
4.6	Energy Consumption		4-69
4.7	Cumulative Impacts		4-71
5.0	GROWTH INDUCING IMPACTS		5-1
6.0	SIGNIFICANT OFF-RESERVATION ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED OR WOULD BE IRREVERSIBLE IF THE PROPOSED PROJECT IS IMPLEMENTED		6-1
7.0	ALTERNATIVES TO THE PROPOSED PROJECT		7-1
7.1	Rationale for Alternative Selection		7-1
7.2	Other Alternatives Considered		7-1
	7.2.1	Hotel Located on Eastern Side or Outside of Reservation	7-1
	7.2.2	Smaller Hotel	7-1
8.0	COUNTY NEGOTIATIONS		8-1
9.0	LIST OF MITIGATION MEASURES		9-1
9.1	Aesthetics		9-1
9.2	Air Quality		9-1
9.3	Water Resources		9-2
9.4	Traffic		9-2
10.0	LIST OF TEIR PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED		10-1
11.0	LIST OF REFERENCES		11-1

Table of Contents (continued)

LIST OF FIGURES

FIGURE NO.		PAGE NO.
2-1	Regional Vicinity	2-2
2-2	Project Location (Aerial)	2-3
2-3	Project Location (Topographical)	2-4
2-4	Conceptual Site Plan	2-5
2-5	Overall Site Plan – 1st Level	2-7
4.1-1	Proposed Location, Potential Viewpoints (VPs), and Topography	4-8
4.1-2	Existing Conditions and Visual Simulations for Viewpoint C	4-9
4.1-3	Existing Conditions and Visual Simulations for Viewpoint K	4-10
4.1-4	Existing Conditions and Visual Simulations for Viewpoint G	4-11
4.3-1	Viejas Watershed	4-28
4.4-1	Sensitive Receptors	4-38
4.4-2	Monitoring Locations	4-39
4.5-1	Existing Conditions	4-50
4.5-2	Existing Traffic Volumes (Weekday/Saturday)	4-52
4.5-3	Project Traffic Distribution (Weekday/Saturday)	4-58
4.5-4	Project Traffic Volumes	4-59
4.5-5	Existing + Project Traffic Volumes	4-60
4.5-6	Cumulative Projects Traffic Volumes	4-65
4.5-7	Existing + Project + Cumulative Projects Traffic Volumes	4-66

LIST OF TABLES

TABLE NO.		PAGE NO.
2-1	Changes in Gaming Square Footage	2-9
2-2	Summary of Cumulative Projects–Alpine Community Planning Area	2-10
4.2-1	Current Federal and State Ambient Air Quality Standards	4-16
4.2-2	San Diego County Attainment Status	4-18
4.2-3	Ambient Air Quality Data	4-19
4.2-4	Estimated Maximum Daily Construction Emissions	4-22
4.2-5	Estimated Operational Emissions	4-23
4.3-1	Viejas Water Use Summary, 2012 through 2015	4-29
4.3-2	Project Water Demand	4-33
4.4-1	Noise Monitoring Results	4-40
4.4-2	Typical Construction Equipment Noise Levels	4-43
4.4-3	Typical Maximum Construction Noise Levels at Various Distances from Project Construction	4-44
4.4-4	Vibration Source Levels for Construction Equipment	4-44
4.4-5	Existing and Project Related Noise Levels	4-45
4.5-1	Existing Traffic Volumes	4-51
4.5-2	Existing Intersection Operations	4-53

Table of Contents (continued)

LIST OF TABLES (continued)

TABLE NO.		PAGE NO.
4.5-3	Existing Street Segment Operations	4-53
4.5-4	County of San Diego Significance Criteria Project-Related Increases that Exceed the Level of Significance	4-55
4.5-5	Project Trip Generation	4-57
4.5-6	Near-Term Intersection Operations	4-61
4.5-7	Near-Term Street Segment Operations	4-62
4.5-8	Long-Term Street Segment Operations	4-64

LIST OF APPENDICES

A Notice of Preparation/Initial Study Checklist
Prepared by BRG Consulting, Inc.
May 26, 2016 (bound with TEIR)

The following are contained on the CD, which is attached to the back of this TEIR

B Visual Impact Analysis
Prepared by BRG Consulting, Inc.
July 2016

C Air Quality Study
Prepared by Birdseye Planning Group
June 2016

D Supporting Water Supply Assessment
Prepared by Environmental Navigation Services, Inc.
June 21, 2016

E Noise Study
Prepared by Birdseye Planning Group
August 2016

F Traffic Impact Analysis
Prepared by Linscott, Law & Greenspan, Engineers
July 8, 2016

ACRONYMS

AcFt	Acre-feet
a.m.	morning
ADT	Average Daily Trips
AQIA	Air Quality Impact Assessment
AMSL	Above Mean Sea Level
BMP	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CalEEMod	California Emissions Estimator Model
CBC	California Building Code
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act
CFC	California Fire Code
CNEL	Community Noise Exposure Level
CO	Carbon monoxide
dBA	A-weighted decibels
DG	Decomposed granite
DPW	Department of Public Works
EIR	Environmental Impact Report
EMS	Emergency Medical Services
ET	Evapotranspiration
FCI	Forest Conservation Initiative
FCI GPA	Forest Conservation Initiative General Plan Amendment
ft	feet
FTA	Federal Transit Administration
GPA	General Plan Amendment
g/l	grams per liter
gpm	gallons per minute
HVAC	Heating, ventilation, and air conditioning
I-8	Interstate 8
IGRA	Indian Gaming Regulatory Act
Ldn	Day-night average sound level
Leq	Equivalent sound level
Lmax	Maximum sound level
LOS	Level of Service (for traffic)
NOP	Notice of Preparation
NOx	Oxides of nitrogen
O_3	Ozone
p.m.	afternoon, evening
PM_{10}	Particulate Matter, 10 microns or smaller in size

$PM_{2.5}$	Particulate Matter, 2.5 microns or smaller in size
ppm	parts per million
RAQS	Regional Air Quality Strategy
ROG	Reactive Organic Gases
SANDAG	San Diego Association of Governments
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SEIR	Supplemental Environmental Impact Report
SIP	State Implementation Plan
SO_X	Sulfur Oxide
sq ft	square feet
TEIR	Tribal Environmental Impact Report
TNM	Traffic Noise Model
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geologic Survey
VOC	Volatile Organic Compounds
VP	Viewpoint
yr	year
$\mu g/m^3$	micrograms per cubic meter

SUMMARY

S.1 Project Synopsis

The proposed Viejas Casino and Resort - Phase 3 Project (Project) is for the construction and operation of a 170 room, five-story hotel, the demolition and reconstruction of a portion of the existing Casino and some interior renovations of the existing Casino. The hotel includes one basement level for back of house functions including service kitchens and offices. Amenities include a full service spa with private pool located at the main level of the hotel and an outside hotel pool with bar service.

The Casino currently offers approximately 129,500 square feet (sq ft) of gaming area within the 325,000 sq ft Casino. Current gaming offerings and facilities include slot machines, table games, an off-track betting facility, as well as a special events venue, five restaurants, two 128-room hotels (North and South Tower), and a parking structure. A 400-seat bingo parlor has opened across the street in the outlet center. There is no net change in gaming space as a result of hotel construction, Casino reconstruction or Casino renovations. Additionally, no new infrastructure would be required, or is proposed.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

If the proposed Project is implemented, no significant off-Reservation environmental effects would occur. No mitigation measures are proposed. While proposed Project impacts have been determined to be less than significant and no mitigation measures are required, various avoidance and minimization, design and/or ordinance compliance measures will be adhered to as outlined in Chapter 9.0.

The no significant off-Reservation environmental effect conclusion has been reached based on the analysis in the Initial Study, Tribal Environmental Impact Report (TEIR) Appendix A, and subsequent technical studies addressing aesthetics, air quality, groundwater availability, noise and transportation/traffic (TEIR Appendices B through F).

S.3 Project Alternatives

Alternative hotel sites on the Reservation would not reduce project-related trips on West Willows Road nor minimize construction emissions. Additionally, there is not adequate infrastructure such as sewer, water, electricity or natural gas service presently available to support the proposed hotel in other locations within the Reservation and constructing these would increase environmental impacts. The hotel site needs to be co-located with the Casino to meet the objective of the project “to provide convenient hotel space for Casino guests”. Alternative hotel sites, on- or off-Reservation, would not provide the desired proximity of hotel and Casino. Therefore, other on- or off-Reservation hotel alternatives are not considered feasible alternatives.

A smaller hotel may reduce visual impacts, but significant visual impacts would not be avoided, as visual impacts for the proposed Project have not been found to be significant. A smaller hotel than proposed would marginally reduce

construction-related emission impacts in the area, but would not fill the projected service demand. The existing northern and southern hotel towers operate at approximately 95 percent occupancy, demonstrating the need for a third hotel. Based on the demand, a 170-room third hotel is proposed. If a smaller third hotel is built and cannot meet demands, a potential guest would need to find alternative accommodations in the Alpine or San Diego area, thus resulting in additional vehicle traffic and greenhouse gas emissions. A smaller hotel alternative would not feasibly attain most of the basic project objectives. Therefore, a smaller hotel is not considered a feasible alternative.

1.0 INTRODUCTION

1.1 Project Objectives

The purpose of the proposed Viejas Casino and Resort - Phase 3 Project (Project) is to provide convenient hotel space for Casino guests and improve and modernize existing Casino facilities. The proposed hotel would encourage patrons to stay at the hotel rather than drive home, which would result in an increase in public safety. The proposed hotel and Casino upgrades would facilitate tribal economic development and contribute to the economic viability of the Tribe.

1.2 Gaming Background Information

Gaming is one of the oldest forms of recreation, and Indian gaming predates European settlement in America. Large-scale tribal government gaming, mainly in the form of Bingo, began in the 1970s. In 1987, the United States Supreme Court recognized the right of American Indian tribal governments to run gaming, ruling that states had no Constitutional authority to prohibit or regulate gaming on Indian land if such gaming is permitted outside the reservation for any other purpose. Following the Supreme Court decision, Congress passed the Indian Gaming Regulatory Act (IGRA) to place some restriction on tribal government gaming. The IGRA separated gaming into three classes: Class I, traditional Indian social gaming; Class II, bingo, similar games and card games lawful in the state; and, Class III, all other forms of gaming. The IGRA also gave limited jurisdiction for joint regulation of tribal government gaming to the states in the case of Class III gaming. This was accomplished through the requirement that tribes negotiate compacts with states.

On September 10, 1999, 58 tribal governments executed compacts with the State of California. The Tribe and the State's compact is titled the "Tribal-State Compact between the State of California and the Viejas Band of Kumeyaay Indians" (1999 Compact). The compacts limited the number of slot machines in the state to those already in operation, and allowed 350 slot machines for each tribe that did not have gaming prior to September 1, 1999. There was also a maximum of 2,000 gaming devices per tribe, which includes existing devices. The compacts call for strict tribal-state-federal regulation of gaming as provided by the federal IGRA and as detailed in the compacts. Additionally, the compacts use funds from gaming device licensing fees for a revenue-sharing fund to provide revenue distributions to non-gaming tribes. The compacts also call for the allocation of up to 13 percent of net win revenues to cover the state costs of gaming regulation, funding impacts on local governments and a state problem gambling program, as well as appropriations as determined by the Legislature. Implementation of the compacts was subject to approval of Proposition 1A - the Indian Self-Reliance Initiative - which appeared on the March 2000 Ballot and was approved by the voters.

In June 2004, the State of California and the Viejas Band of Kumeyaay Indians agreed to an amendment to the 1999 Viejas Tribal-State Compact (2004 Amendment). In August 2014, the terms of 1999 Compact (as previously amended by the 2004 Amendment) was amended and restated superseding previous versions. The Amended and Restated Tribal-State Gaming Compact between the State of California and the Viejas Band of Kumeyaay Indians (Viejas, 2014a) is referred to as 2014 Compact throughout this TEIR. A new hotel serving the Casino falls within the definition of a "Project" under the 2014 Compact. Exhibit B of the 2014 Compact identifies the specific off-reservation environmental considerations to be addressed in evaluation of such a Project.

Indian tribes are using gaming revenues to build houses, schools, roads and sewer and water systems; to fund the health care and education of their people; and to develop a strong, diverse economic base for future generations. As a direct result of tribal gaming, unemployment and welfare subsidies have been drastically reduced on gaming reservations and tribal governments have begun to raise the revenues they have lacked for decades to fund basic governmental services, such as police, fire, health care, education and other government-provided programs. Tribal governments use gaming proceeds to diversify their economics by entering into other enterprises.

1.3 Intended Uses of this TEIR

Preparation of this TEIR is required by the 2014 Compact (Section 10.8.1). It serves to inform public agency decision-makers and the public generally of any anticipated significant off-Reservation environmental effects of the proposed Project, to identify ways to minimize the significant effects, and to describe reasonable alternatives that would not cause it to forego gaming activities. If significant impacts from a project are identified, the TEIR provides a basis for discussion with local governments about how best to minimize such impacts.

The TEIR generally follows County of San Diego Environmental Impact Report (EIR) Format and General Content Requirements (County of San Diego, 2006), to the extent that those requirements are consistent with requirements of the Compact.

1.4 Notice of Preparation

A Notice of Preparation (NOP) of a Draft TEIR along with an attached Draft Initial Study describing the project, location and potential environmental effects was circulated for public review by the County from May 27 to June 27, 2016 and by the State Clearinghouse from July 12 to August 11, 2016, in accordance with the Compact Section 10.8.2.

2.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

2.1 Project Location

The regional location of the proposed Project is shown in Figure 2-1. The proposed Project is located within the northeastern portion of Section 30 (Range 3 East, Township 15 South) of the San Bernardino Base and Meridian, USGS 7.5-Minute Viejas Mountain Quadrangle. The proposed Project site is located within the Viejas Indian Reservation (Reservation), at 5000 Willows Road, in the unincorporated San Diego County community of Alpine (Figures 2-2 and 2-3). The Project area is located north of Willows Road and south of Viejas Creek in the southwestern area of the Reservation and is part of the Viejas Casino & Resort. Access to the Viejas Casino & Resort is via Willows Road, immediately north of Interstate 8 (I-8).

2.2 Project Description

The proposed Project is for the construction and operation of a third hotel, the demolition and reconstruction of a portion of the existing Casino and some interior renovations of the existing Casino. There is no net change in gaming space as a result of construction, reconstruction or renovations. A conceptual site plan is shown in Figure 2-4.

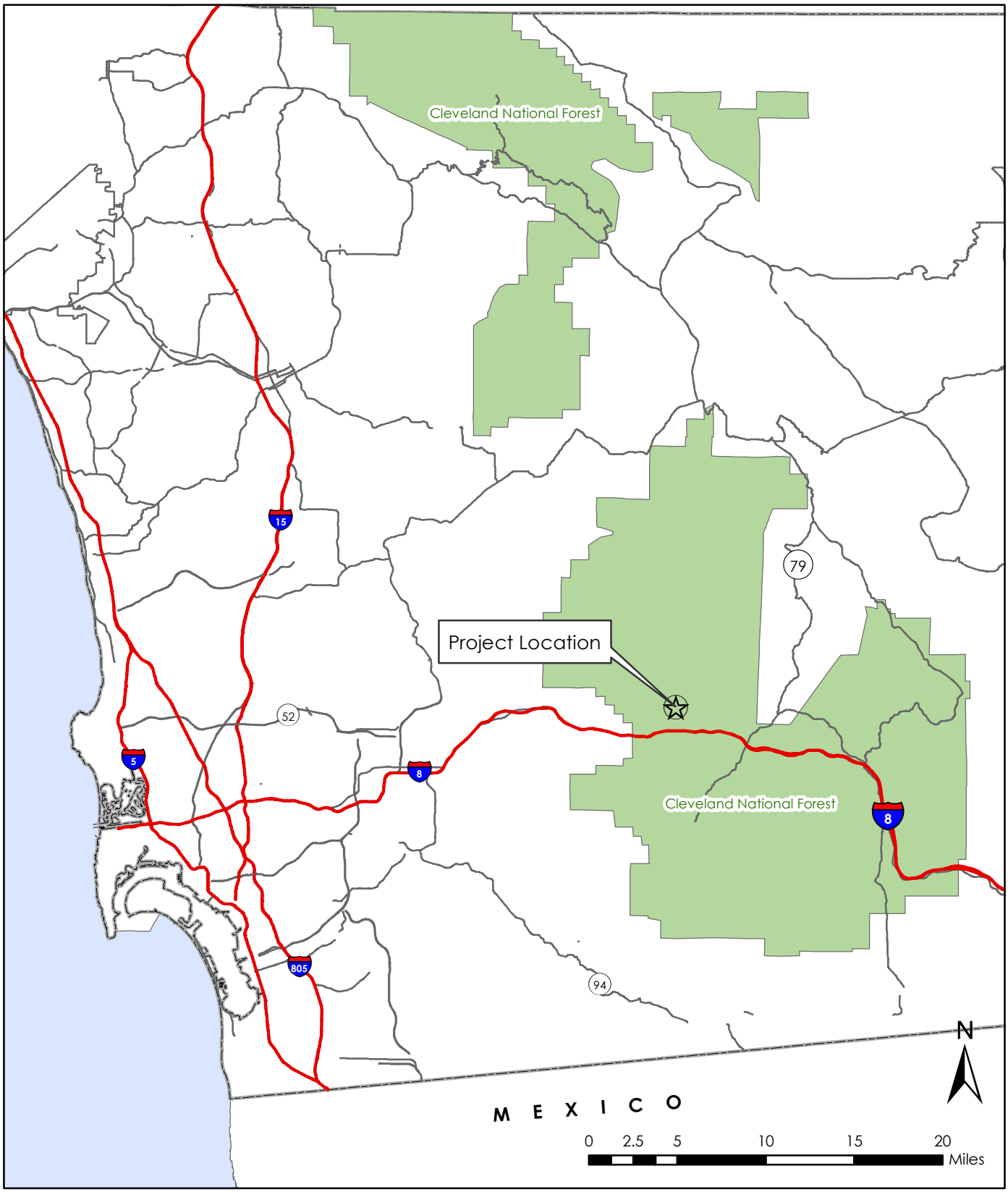
The proposed five-story hotel will accommodate up to 170 all-suite rooms plus one basement level for back of house functions including service kitchens and offices. Amenities include a full service spa with private pool located at the main level of the hotel and an outside hotel pool with bar service.

A portion of the existing Casino will be demolished and reconstructed in place and a portion will be renovated. Amenities include three restaurant/bar venues. Figure 2-5 is a first floor site plan showing the location of amenities for the hotel and Casino.

A new bus terminal and bus drop off area will be constructed near the existing Casino's northwest entry and a new casino walk will provide access to the proposed hotel. The valet will be relocated to the new hotel porte cochère.

The total project building area is approximately 215,000 sq ft consisting of: 165,000 sq ft of hotel including a 9,000 sq ft spa; 20,000 sq ft of demolished and replaced in kind Casino; 20,000 sq ft of existing Casino renovation; 9,750 sq ft of restaurants/kitchen; and, a 1,900 sq ft bus depot. The total project landscaped area is approximately 200,000 sq ft. All new construction work, renovation and landscaping will occur on existing developed land (existing parking lot and existing Casino) within an approximately 280,000 sq ft project footprint area.

The Casino currently offers approximately 129,500 sq ft of gaming area within the 325,000 sq ft Casino. Table 2-1 provides a summary of changes in gaming square footage at the Casino. Current gaming offerings and facilities include slot machines, table games, an off-track betting facility, as well as a special events venue, five restaurants, two 128-room hotels (North and South Tower), and a parking structure. A 400-seat bingo parlor has been opened across the street in the outlet center. There is no net change in gaming space as a result of hotel construction, Casino reconstruction or Casino renovations.



SOURCE: SanGIS, 2016

7/15/16

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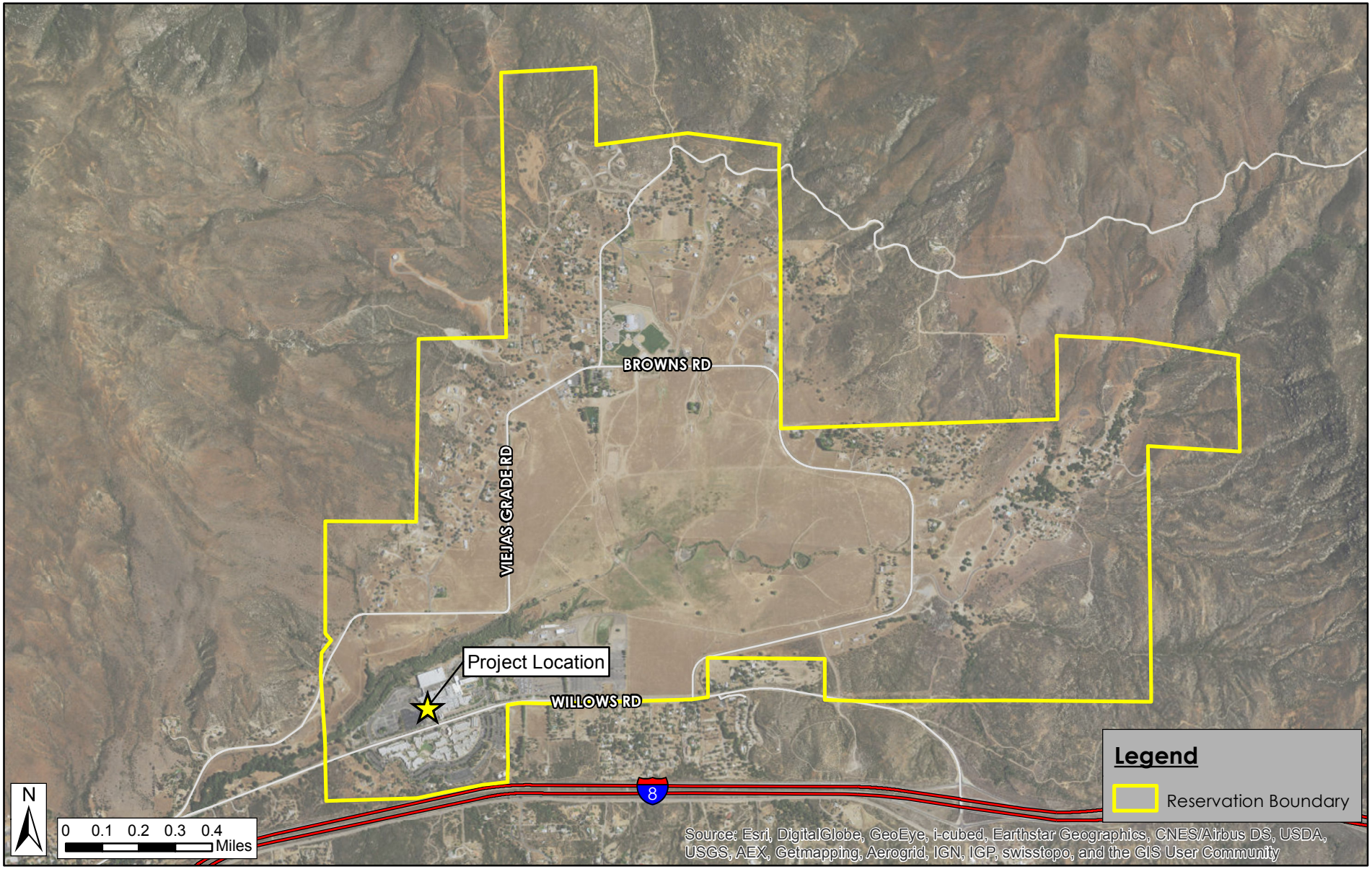
Viejas Casino & Resort - Phase 3

Regional Vicinity Map

FIGURE

2-1



SOURCE: Esri, 2016; SanGIS, 2016

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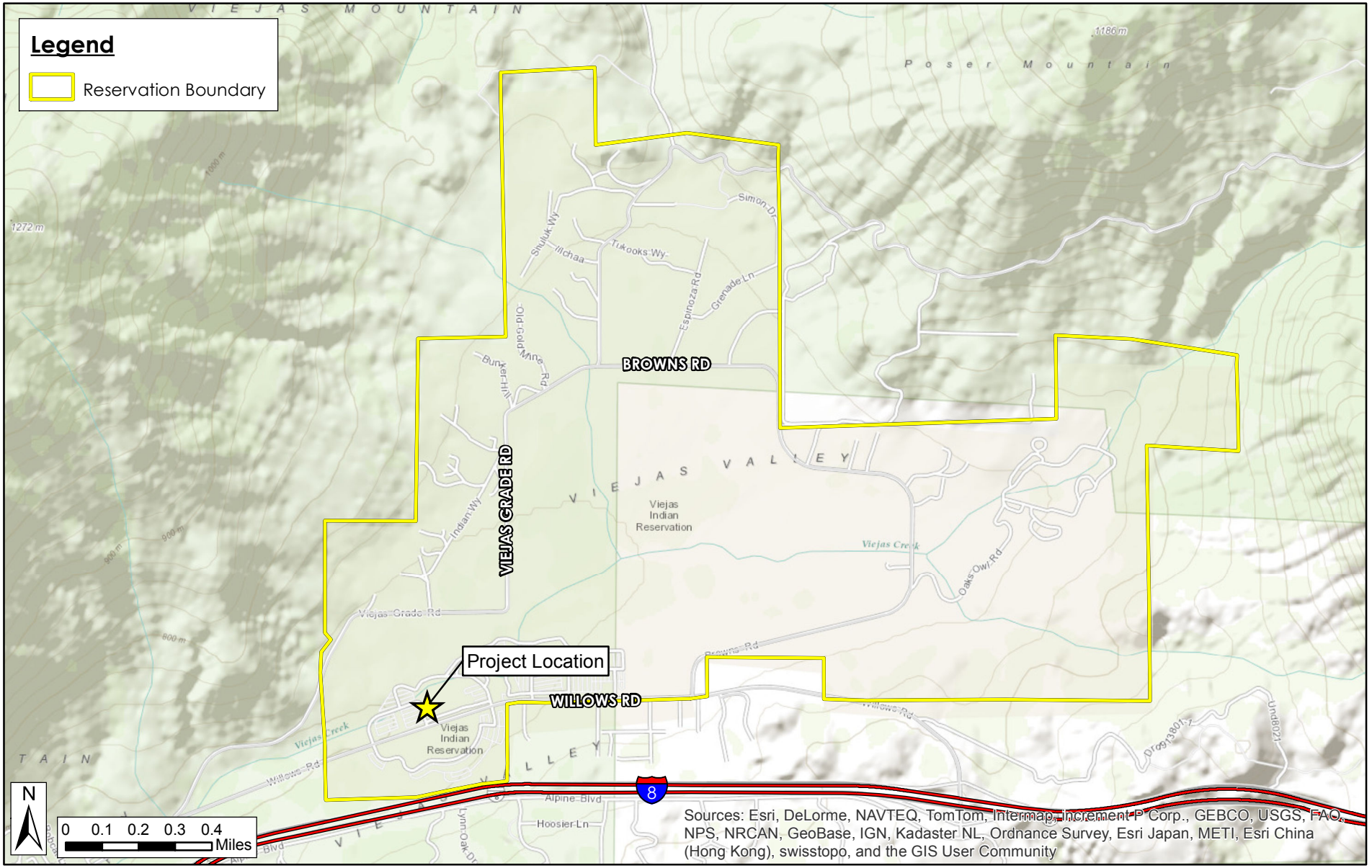
Viejas Casino & Resort - Phase 3

Project Location (Aerial)

FIGURE 2-2



SOURCE: Esri, 2016; SanGIS, 2016

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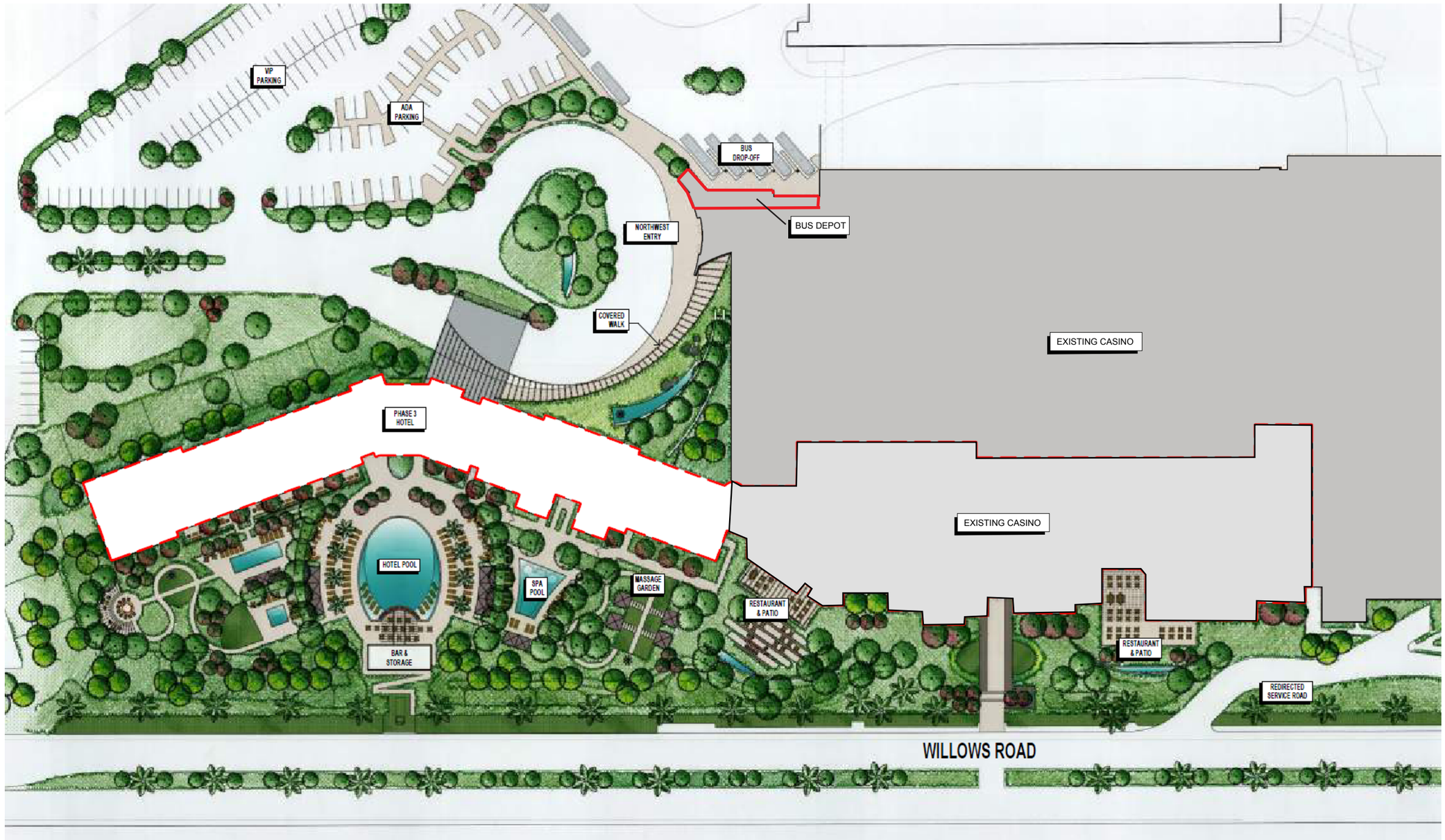
Viejas Casino & Resort - Phase 3

Project Location (Topographical)

FIGURE 2-3



SOURCE: Igroup Design, 2016

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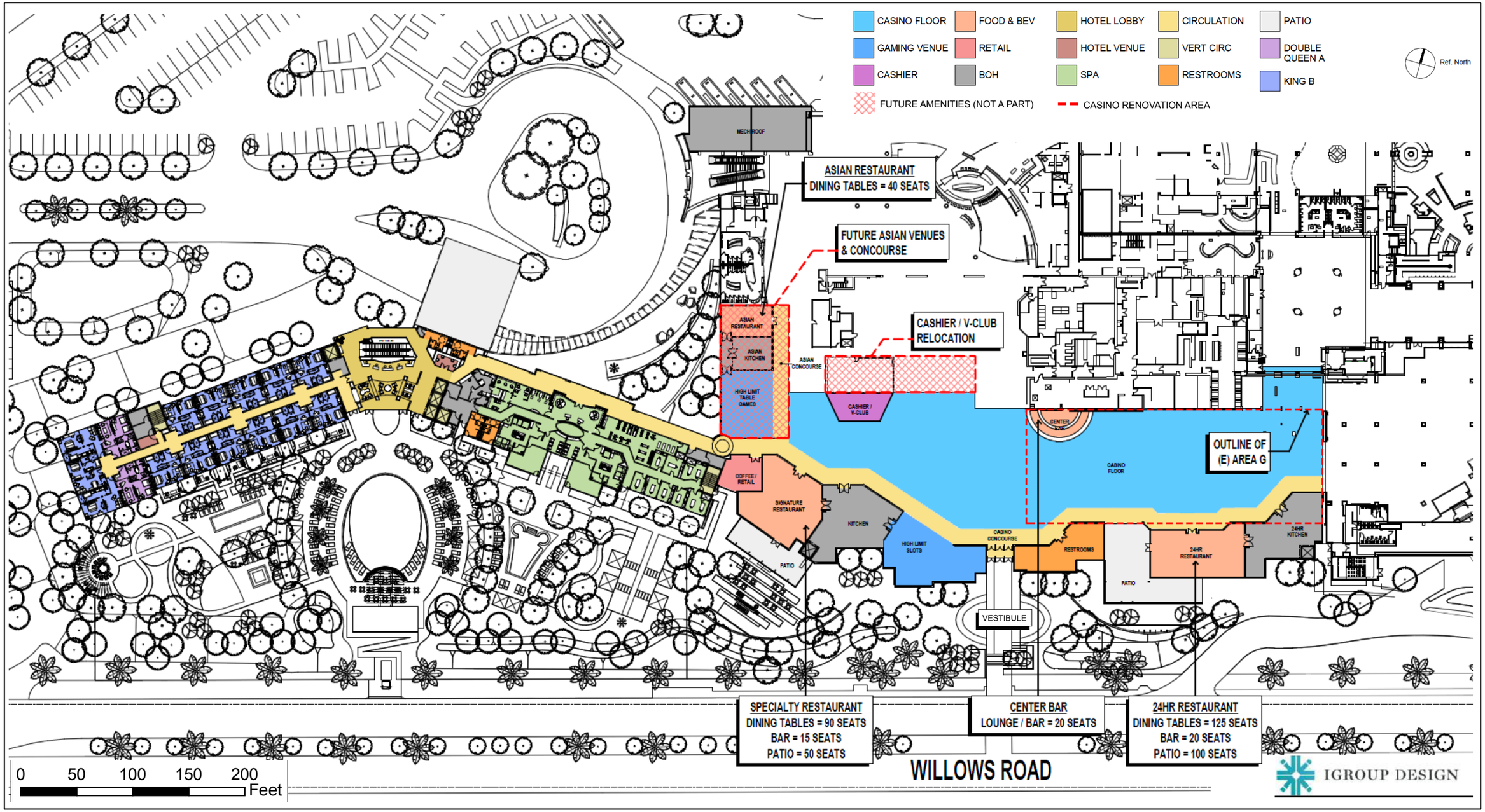
Viejas Casino & Resort - Phase 3

Conceptual Site Plan

FIGURE 2-4



SOURCE: Igroup Design, 2016

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Viejas Casino & Resort - Phase 3

Overall Site Plan - 1st Level

FIGURE 2-5

Table 2-1
Changes in Gaming Square Footage

Project	Existing Gaming Area	Project Gaming Area	Total Gaming Area with Project
Viejas Casino Expansion	115,000 sq ft	+18,000 sq ft	133,000 sq ft
Viejas Hotel	133,000 sq ft	-20,000 sq ft	113,000 sq ft
Viejas Parking Structure	113,000 sq ft	0 sq ft	113,000 sq ft
Viejas Hotel South Tower	113,000 sq ft	+16,500 sq ft	129,500 sq ft
Phase 3 improvements	129,500 sq ft	0 sq ft	129,000 sq ft
Net Overall Reduction			**3,500 sq ft**

Source: BRG 2014 and NOP 2016 (Appendix A)

2.3 Environmental Setting

The Project site is developed with a parking lot and existing Casino. The Viejas Outlet Center is located south of the Casino and south of Willows Road. Interstate-8 (I-8) lies to the south of the Outlet Center, with residential areas of the community of Alpine south of I-8. Non-Reservation residential areas are also found along Willows Road, both to the east and west of the Reservation.

To the north of the Project site is Viejas Creek, a restored perennial stream with associated native riparian habitat. The Tribal residential area lies to the north of Viejas Creek, as does land used for cattle grazing. Coast live oak trees are common throughout this area. The Cleveland National Forest lies to the north, east and west of the Reservation. Various private residential in-holdings lie between the Reservation and Cleveland National Forest.

2.4 Potential Cumulative Impacts

Past development projects on and outside the Reservation that are considered in this analysis include the original Viejas Casino and Outlet Center, a 45,000 sq ft Casino expansion developed in 2006, the Albertson's shopping center project in Alpine, prior Viejas Hotel Projects (2012 and 2014) and the Viejas Parking Structure which was developed in 2013. Information regarding other current or anticipated near-term development projects located in the Alpine area was obtained from the County of San Diego, and is shown in Table 2-2. County land use planning for private lands under County jurisdiction is found in the San Diego County General Plan (County of San Diego, 2011). County planning for Forest Conservation Initiative (FCI) lands south of the Reservation is considered by this TEIR (County of San Diego, 2016)).

TABLE 2-2
Summary of Cumulative Projects–Alpine Community Planning Area

No.	County Processing No.	Project Name	Land Use	Intensity/Units
1	350010-005	Cronin Light Industrial	Industrial Park	33,500 sq ft
2	3500 03-073-01	DGJM Self Storage	Storage	119,800 sq ft
3	3500 01-064-01	Alpine Regional Center Expansion	Specialty Retail	25,000 sq ft
			Bank with Drive-Through	2,000 sq ft
4	3300 64-018-04	Alpine Convalescent	Convalescent	29 beds
5	3500 10-022	Victoria Village	Specialty Retail	5,500 sq ft
			Condominiums	4 DU
6	3100 5431	Victoria Estates	Rural Estates	35.0 DU
7	N/A	Alpine High School	High School	1,100 students
8	N/A	Library	Library	13,000 sq ft
9	N/A	Walker Health Clinic	Dental & Standard Comm Office	26,400 sq ft

General Notes:
Sq ft – Square Feet
DU – Dwelling Units
N/A – Not available
Source: LLG Engineers, 2016

3.0 SIGNIFICANT OFF-RESERVATION ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT THAT CAN BE MITIGATED

No significant off-reservation environmental effects that would require mitigation have been identified for the proposed Project.

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4.0 Environmental Effects Found Not to be Significant

The proposed Project Initial Study (Appendix A) found that project off-Reservation impacts would be less than significant for agricultural resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use, mineral resources, population and housing, public services, recreation, and utilities and service systems. The reasons for determining that various effects of the proposed Project on the off-Reservation environment are not significant are stated in the Initial Study and consequently have not been discussed in further detail in this TEIR (it was confirmed by the Noise Study, see Appendix E, that construction noise impacts to off-Reservation biological resources are less than significant). No impacts were found to be significant as stated in Chapter 3.0 of this TEIR.

The proposed Project Initial Study found that aesthetics, air quality, water quality (groundwater availability), noise, transportation/traffic and cumulative impacts associated with the proposed Project might result in significant off-Reservation impacts. The 2014 Compact also requires measures to minimize energy consumption. Aesthetics, air quality, water quality (groundwater availability), noise, transportation/traffic, energy and cumulative impacts are discussed further in Sections 4.1 through 4.7.

Issues identified during the Viejas Hotel South Tower TEIR (Viejas, 2014b) process that are relevant to the proposed Project are discussed below (even though environmental topics related to these issues were found to be less than significant as part of the Initial Study):

- In accordance with the 2014 Compact (Section 6.4.2), the structure would meet the California Building Code (CBC) and California Fire Code (CFC) as described in the California Code of Regulations Titles 19 and 24;
- The hotel fire sprinkler system would be constructed in accordance with CFC applicable to the systems utilized in the building inclusion of fire sprinkler, standpipe and alarm systems;
- Contractors are familiar with the CBC and CFC, therefore, compliance would not require the tribe to acquire additional labor or unique skills for the construction of the proposed hotel;
- The hotel would have a maximum occupation height of 55 feet and would provide operational enhancements that meet high rise standards, which is beyond the requirements for such structure height;
- Hotel staff is capable and experienced in managing and operating the equipment associated with a six-story structure;
- The amount of staffing is adequate to accommodate a 170 room hotel;
- Hazardous materials typically used at hotels would be handled in accordance with Federal and State laws and regulations;
- Current public services are adequate. Public services provided by the County, such as District Attorney and Sheriff, are adequate to meet the anticipated needs of the proposed hotel.
- Viejas maintains automatic mutual agreements with agencies in the Central and East Zones for additional manpower and equipment support as needed; therefore, adequate fire suppression capacity, emergency medical services (EMS) and law enforcement services would be provided; and,

- Adequate Fire Safety Public Services would be provided. Information on Fire Safety Public Services is provided below:
    - As required in Sections 6.4.2 (d) through (j) of the 2014 Compact, the proposed hotel would be built according to the State adopted International Building Codes and Fire Codes. In compliance with those codes, adequate fire sprinklers would be installed in the hotel, and the structure would have appropriate fire equipment access to areas near the proposed hotel, and availability of appropriate fire-fighting equipment. A fire flow analysis has been conducted for the proposed project and the project would be consistent with all of the code requirements identified in the Tribe's Gaming Compact.
    - The Viejas Fire Department¹s current fleet of suppression vehicles consists of a type 1 engine, a type 3 engine and a type 2 truck that is cross-staffed by 3 firefighters. Viejas has a current agreement with the predecessor agency to the San Diego County Fire Authority and honors its commitments under that agreement. Viejas also has an agreement with the San Diego County Fire Authority to jointly operate a water tender.
    - The Viejas Fire Department operates an advance life support ambulance that is staffed with 2 firefighters. In addition, Viejas has Automatic Aid arrangements with other service providers in the Central Zone such as Alpine, Heartland Fire Rescue, Santee and Lakeside. Approximately 60 percent of the EMS calls responded to by Viejas Fire Department are to areas outside the Reservation. This rate is not expected to change as a result of the proposed hotel. Most of the patrons expected to stay at the hotel are persons who already are in attendance at the Casino or the Outlet Center, and thus would not result in additional EMS calls.
    - The area near Viejas is under the jurisdiction of the U.S. Forest Service, with which the Tribe has a close working relationship through an interagency cooperative agreement. In conjunction with the Forest Service, Viejas has implemented a defensible space program as part of a Bureau of Indian Affairs approved fire management plan. Viejas' fire standards mirror those of the Forest Service and Viejas would provide adequate protection to all on the Reservation. With regards to wildfires, the hotel would be able to operate as a 'shelter-in-place'.

Under provisions of Section 10.8.8 of the 2014 Compact, it is required that the Tribe offer to commence negotiations with the County of San Diego no later than the issuance of the Final TEIR to develop an enforceable written agreement with respect to all potential off-Reservation environmental effects, such as those in the bulleted list above. We believe that the discussions in the Initial Study regarding these issues are adequate, and that, if the County needs such "assurances", the Tribal-County negotiations leading up to the written agreement is the appropriate vehicle for further discussion and resolution.

4.1 Aesthetics

Information contained in this section is summarized from the *Visual Impact Analysis, Viejas Casino & Resort – Phase 3* prepared by BRG Consulting, Inc. (July, 2016) provided in Appendix B to this TEIR.

4.1.1 Existing Conditions

The majority of the Viejas Reservation is within the Viejas Valley surrounded by mountains of the Cleveland National Forest. The site for the proposed hotel is within Viejas Reservation (and Valley) west of and adjacent to the existing Casino north of Willows Road. An Outlet Center shopping complex is south of the Casino and Willows Road. The existing Casino & Resort and Outlet Center complex contains approximately 850,000 sq ft of developed space, in structures ranging from 30 to 70 feet in height. The existing buildings at the Casino and Outlet Center are painted a variety of earth-tone hues. Elevation of the proposed hotel site is approximately 2,315 feet above mean sea level (AMSL).

Riparian lands associated with Viejas Creek are located to the north (on-Reservation) and west (off-Reservation) of the proposed hotel site. Beyond the creek are grasslands where cattle and horses owned by Tribal members graze. Viejas Grade Road passes through this area, from its intersection with Willows Road a few hundred feet west of the Reservation boundary. After leaving the north edge of the Reservation, Viejas Grade Road proceeds on to Descanso, and to Descanso Junction. The road is maintained by San Diego County as an unpaved road for six miles or more, and then as an asphalt-paved road to Descanso. Viejas Grade Road through the Reservation and beyond is a designated Riding and Hiking Trail per the Community Trails Master Plan for the Alpine Community (County of San Diego, 2015). Beyond Viejas Grade Road, and its tributary Browns Road, there are areas of Tribal member housing. Outside the Reservation, there are a few scattered private homes; many of them are currently owned by Viejas. Finally, beyond the Tribal and other private homes, the topography rises to Viejas Mountain to the northwest, with an elevation of 4,187 ft AMSL; to Poser Mountain to the northeast, elevation 3,917 ft; and Chiquito Peak to the east, elevation 4,127 ft. Most of these more rugged lands are under the jurisdiction of the U.S. Forest Service (Cleveland National Forest).

To the southeast of the site is the Outlet Center and then private residential properties on 5-10 acre parcels, as well as an existing commercial “Trading Post.” The four-lane I-8 highway passes to the south approximately 1,500 feet from the site, and on the south side of I-8 are low-density residential lands. Farther south are additional lands that are part of Cleveland National Forest. I-8 is not designated as a state scenic highway, but has been identified in the Alpine Community Plan as a “Second-Priority Scenic Route,” according to the San Diego County General Plan (County of San Diego, 2011a).

The Alpine Community Plan (County of San Diego, 2010) indicates that the visual quality of the landscape is important, especially protection of scenic ridgelines and natural oak groves. The plan also indicates that it is the community intent to keep residential and agricultural areas of Alpine free from industrial and major commercial encroachments. The Resource Conservation appendix of the plan indicates that lands at Viejas Mountain, Viejas Indian Reservation, and Poser Mountain, all in the vicinity of the proposed Project, should be conserved in order to protect valuable resources. According to the appendix, Viejas Mountain is valuable as a local “aesthetic landmark”, its undisturbed chaparral habitats, and three specific rare plants. Poser Mountain has similar resources, although it is not named as an “aesthetic landmark.” Finally, Viejas Indian Reservation is noted for its high concentration of known

and yet unknown archaeological sites. Viejas Creek, to the west of the Reservation, is identified for conservation of its perennial stream and aquatic ecosystems, adjacent to oak and riparian woodlands. In apparent contrast to the Alpine Community Plan, the County is processing a General Plan Amendment (GPA) for the Forest Conservation Lands in the vicinity of the Reservation that would allow substantial new commercial and residential development.

No state-designated scenic highways are located in the Alpine Community Plan area, but I-8, which bisects the plan area, is identified as a "second priority" scenic route. The Scenic Highways chapter goes on to identify the following "scenic view corridors" of the Community Plan:

- From I-8 toward El Capitan Reservoir
- East and west views of Viejas Mountain from I-8; and
- From I-8 south along the Sweetwater River.

4.1.1.1 Visual Character

The visual character of the proposed hotel site is that of an existing commercial and hotel development, integrated visually by the scale of structures ranging in height from 30 to 70 feet, and displaying a palette of earth-tone colors. The structures themselves are surrounded by surface parking lots and a parking structure for visitors and employees, as shown in Figure 2-2. The landform at the site is flat (upper parking lot and lower parking lot), with no rock outcroppings or vegetation patterns other than landscape plantings. The site is south of the existing Viejas Creek, a riparian corridor.

The visual character of the general site vicinity is that of a grass-covered valley, surrounded by a circle of chaparral-covered hills and mountain slopes, presided over by Viejas Mountain to the northwest, Poser Mountain to the northeast, and Chiquito Peak to the east, as indicated in Figure 4.1-1. Adjacent to the grasslands are gentle slopes that contain oak woodlands and scattered residential areas for Tribal residents. Non-Tribal homes in the vicinity are concentrated along Willows Road west of the Reservation, and a small number of non-Tribal homes are located to the northeast of the Reservation and southeast of the Reservation both to the north and south of I-8.

4.1.1.2 Visual Quality

The visual quality of the project viewshed can be characterized as "representative" of the Lower Californian physiographic province. The original granite uplands, intervening valleys, chaparral-covered hillsides, oak groves and grasslands remain, but there has been scattered human development in the area including I-8; various County roadways (Alpine Boulevard, Willows Road, Viejas Grade Road); both Tribal and non-Tribal residential development, most of the latter being located near I-8; and the Casino/Hotel/Parking Structure/Outlet Center development.

There are four well defined landscape units including mountains, valley, rural residential and commercial. The mountain landscape unit is a vivid, intact and unified landscape unit. The most distinctive natural visual element within this landscape unit and the overall viewshed is the presence of solitary Viejas Mountain. Additionally, the granitic boulders of Chiquito Peak east of the Reservation have their own local distinctiveness. For the valley landscape unit, it is mostly vivid and intact but its unification is interrupted by the commercial structures. The commercial landscape unit, the Viejas Casino & Resort (with two existing hotels), Parking Structure, and Outlet Center complex, is the most distinctive man-made visual element within the viewshed with the residential units not being very distinctive. The commercial unit is unified in that structures are of similar height, material and color.

4.1.1.3 Viewer Response

A Viewer Sensitivity

The Alpine Community Plan indicates that the visual quality of the landscape is important, especially protection of scenic ridgelines and natural oak groves. The Alpine Community Plan also indicates that it is the community intent to keep residential and agricultural areas of Alpine free from industrial and major commercial encroachments. The Resource Conservation appendix of the Alpine Community Plan indicates that lands at Viejas Mountain, Viejas Indian Reservation, and Poser Mountain, all in the vicinity of the proposed project, should be conserved in order to protect valuable resources. According to the appendix, Viejas Mountain is valuable as a local "aesthetic landmark", for its undisturbed chaparral habitats, and three specific rare plants. Poser Mountain has similar resources, although it is not named as an "aesthetic landmark." Finally, Viejas Indian Reservation is noted for its high concentration of known and other unknown archaeological sites. Viejas Creek, to the west of the Reservation, is identified for conservation of its perennial stream and aquatic ecosystems, adjacent to oak and riparian woodlands. In apparent contrast to the Alpine Community Plan, the County is processing a GPA for the Forest Conservation Lands (County of San Diego, 2016) in the vicinity of the Reservation that would allow substantial new commercial and residential development.

No state-designated scenic highways are located in the Alpine Community Plan area, but I-8, which bisects the Community Plan area, is identified as a "second priority" scenic route per County analysis. The Scenic Highways chapter goes on to identify the following "scenic view corridors" within the boundaries of the Alpine Community Plan:

- From I-8 toward El Capitan Reservoir
- East and west views of Viejas Mountain from I-8

B Viewer Groups

There are three groups of potentially sensitive viewers from public lands or facilities. These include westbound travelers on I-8, westbound travelers on Willows Road and travelers on Viejas Grade Road.

Other than the top of Viejas Mountain, there are no other visually sensitive public park or vista areas within the project viewshed from which viewers could see the proposed hotel. In the case of Viejas Mountain, the access trail approaches the peak from the west, and only from the very top would hikers would have an obstructed and minimal view of the project, from a distance of approximately 1.75 miles. From that distance, although the top of hotel would be slightly visible, it would be seen only as a part of the existing commercial and Casino complex and would be primarily blocked by the existing parking structure and Casino complex.

It is expected that owners of some private homes near Viejas would be able to see the proposed hotel. However, scenic views are typically accessible from public areas such as parks and roadways, not from private areas.

4.1.1.4 Viewer Exposure

Viewer exposure is a composite of visibility, viewing distance, viewing angle and duration of view. However, the initial key question from potential sensitive viewpoints (VP) is "Would the project be visible?" Photos were taken toward the proposed hotel site from I-8, Willows Road and Viejas Grade Road from the viewpoint locations shown in Figure 4.1-1. Photos taken from locations I-8 (VP-C), Willows Road (VP-K) and Viejas Grade Road (VP-G) from which the hotel

site would be visible are provided in the top panel of Figures 4.1-2, 4.1-3, and 4.1-4, respectively. Viewpoints from which the proposed hotel site would not be visible or very minimally visible are VPs A, B, D, E, F, H, I, and J. Photos taken from these locations are provided in Appendix A of the Visual Impact Assessment (Appendix B of this TEIR).

4.1.1.5 Viewer Awareness

Viewer awareness of the proposed visual changes would vary greatly by the type of viewer, and the degree of the hotel's visibility. For example, along I-8, from VP-C, many potential viewers would be commuters, traveling the same route for long periods of time. In such a situation, the viewers initially may notice the changes, but that awareness would decrease over the ensuing months and years. Other travelers on I-8 include commercial truckers, with likely little awareness of the project. New travelers along I-8, such as first-time tourists to the area, may be more receptive or interested in the visual changes, but they would have little basis of comparison regarding the prior views that existed. In addition, for all of these viewers traveling at highways speeds, the duration of view is expected to be five seconds or less.

The viewpoint of concern (VP-K) lies east of the Reservation along Willows Road. Willows Road is primarily used as access for local residents, the residents of Viejas Indian Reservation and visitors/employees to the Viejas Casino & Resort. From this vantage point, travelers along Willows Road are focused on the overall existing commercial development, which lies ahead of them to the east. The duration of the view is expected to be ten seconds or less from this viewpoint.

The visibility from the viewpoint (VP-G) along Viejas Grade Road is high. The use of this road is primarily for access to Tribal residential areas. This road would not commonly be used by public vehicles as it becomes steep and is not maintained once it climbs into the mountains. The duration of view would be 20 seconds or more when heading down Viejas Grade Road towards Willows Road but would be brief (a few seconds) when heading away from Willows Road in a vehicle. The right of way of Viejas Grade Road is used for the California Riding and Hiking Trail, a regional riding and hiking resource (Community Trails and Pathways Plan, Alpine). The duration of view would be extended (on the order of minutes) for recreational users heading down Viejas Grade Road towards Willows Road but would be less than a minute when heading away from Willows Road. Recreational users are typically considered more sensitive to potential visual impacts, and the slow pace at which riding and hiking is conducted is more conducive to appreciation of scenic views.

4.1.2 Guidelines for Determination of Significance

Exhibit B of the 2014 Compact utilizes the following guidelines for determination of significance related to potential visual or aesthetic impacts. For purposes of this TEIR, a significant aesthetic impact would occur if implementation of the proposed Project would:

a. *Have a substantial adverse effect on a scenic vista;*

b. *Substantially damage off-reservation scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or,*

c. *Create a new source of substantial light or glare, which would adversely affect day or nighttime views of historic buildings or views in the area?*

4.1.3 Analysis of Project Effects and Determination of Significant Impact

4.1.3.1 Key Views

The "key views" for this analysis are the only visually-sensitive viewpoints from which the proposed hotel would be visible including a short portion of westbound I-8 (VP-C), westbound Willows Road (VP-K) and along Viejas Grade Road (VP-G) as shown in Figure 4.1-1.

The proposed hotel and landscaping will replace an existing parking lot. The hotel is taller than the existing Casino complex, but has less bulk and scale. The hotel will be of similar style to the existing onsite hotels with an exterior skin consisting of a combination of a majority of glass with stone and plaster veneer along with minor metal accents.

4.1.3.2 Assessment of Visual Character

Key View 1 (VP-C): From key view 1 the proposed hotel would not substantially change the visual character of the viewshed. It is within the commercial landscape unit and would not impact mountain or valley views during project construction and only a small portion of valley views would be affected at completion. Duration of views are limited due to speeds on I-8. See visual simulation shown in bottom panel of Figure 4.1-2.

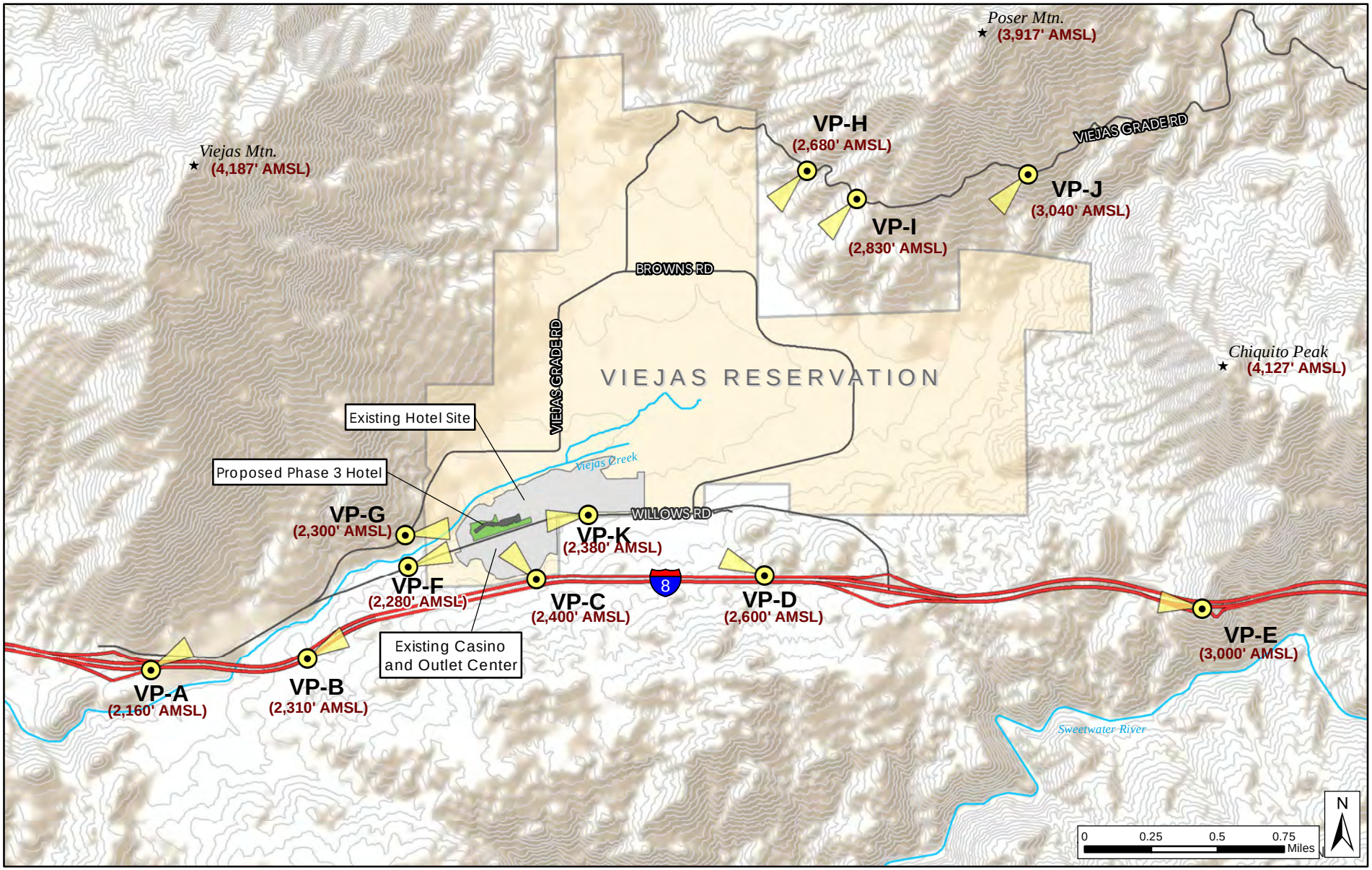
Key View 2 (VP-K): From key view 2 the proposed hotel would not change the visual character of the viewshed, which from this location is mostly the commercial unit. Although visual character from this viewpoint may be affected during project construction (view of cranes) this would be a short-term impact as construction is proposed over a six month to one year period. At project completion, the hotel structure would not be visually dominant as it is partially obscured by the existing Casino as the viewer approaches from the east on Willows Road. In addition, it does add diversity to the structural forms that exist at the Casino complex. The hotel color would be consistent with those of the existing Casino complex. See visual simulation shown in bottom panel of Figure 4.1-3.

Key View 3 (VP-G): From key view 3 the proposed hotel would change the visual character of the viewshed because the hotel will be visible above the riparian tree line. However, mountain views are not affected. See visual simulation shown in bottom panel of Figure 4.1-4.

4.1.3.3 Visual Quality Changes

The new hotel would add visual variety to the forms of the existing Casino complex within the commercial landscape unit. There would be no or minimal changes to other landscape units in the viewshed. The new hotel would have limited amounts of glass for windows similar to the existing onsite hotels. It is anticipated that the hotel would be illuminated using downward-facing lighting from above, similar to the lighting at the existing hotels.

Key Views 1, 2 and 3: Hotel windows would be vertical in orientation, and located below the elevation of potential viewers at the key viewpoints VP-C, VP-K and VP-G and thus, any sun-related glare from either the rising or setting sun would reflect at an angle below viewers at those viewpoints. As with other prior Viejas projects, the hotel lighting would comply with the County's Light Pollution Code, Sec. 59.101, County of San Diego Zoning Ordinance Section 6320, 6322 and 6324, and Title 24 of the California Code of Regulations.



SOURCE: Esri, 2016; SanGIS, 2016; BRG Consulting, Inc., 2016

7/15/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Proposed Location, Potential Viewpoints (VPs), and Topography

FIGURE 4.1-1

SOURCE: BRG Consulting, Inc., 2016

7/15/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Existing Conditions and Visual Simulation of Viewpoint C

FIGURE 4.1-2

SOURCE: BRG Consulting, Inc., 2016

7/15/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Existing Conditions and Visual Simulation of Viewpoint K

FIGURE 4.1-3

SOURCE: BRG Consulting, Inc., 2016

7/15/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Existing Conditions and Visual Simulation of Viewpoint G

FIGURE 4.1-4

4.1.3.4 Assessment of Viewer Response

Key View 1 (VP-C): The proposed hotel would be seen by approximately 34,500 viewers per day on westbound I-8. However, the change in viewer exposure is moderate to moderate-low because: views are of limited duration, less than five seconds; project visibility is low due to highway speeds; the angle of view is off to the right side, not immediately in front of the vehicle, the hotel is not silhouetted against the sky and is viewed more from above since the viewer elevation is approximately 85 feet above the base grade of the proposed hotel; and, although the proximity to the viewer is within 1500 feet, the view of the hotel is partially obscured due to topography and trees. Viewer sensitivity should not change as the viewer elements as shown in Figure 4.1-2 will remain, with Viejas Mountain in the background and the Viejas commercial complex in the foreground. The new hotel would be consistent in color with the existing Casino structures; although it would be larger/taller than many existing structures, it would be a small part of a much-larger commercial complex, and the view of it would be partially screened by nearer vegetation. The proposed hotel would not block views toward other visual landscape units including, valley, rural residential or mountains.

Key View 2 (VP-K): The proposed hotel would be seen by westbound travelers on Willows Road, mostly Casino employees/patrons and residential owners in the area. However, the change in viewer exposure is moderate to moderate-low because: even though the proximity of the viewer is within 1,000 feet, views are of limited duration, ten seconds or less; project visibility is moderate due to speeds on Willows Road; although the hotel may be immediately in front of the vehicle, the viewer is only a 10-20 feet higher than the base grade of the hotel and the hotel is partially obscured by the existing Casino Complex. The new hotel would be consistent in color with existing structures, and, although it would be larger/taller than existing structures, it would not be a dominant visual element to the viewer from this viewpoint due to the obstructed view towards the hotel.

Key View 3 (VP-G): The proposed hotel would be seen by Tribal-residential owners and their visitors as well as recreational users within the road right of way. Viewer response would be moderately affected because even though duration of view ranges from a few seconds to a few minutes and the hotel has high visibility because it is above the tree line, the nearest distance is about 1500 feet distance from the viewer to the proposed hotel reducing the visual impact.

The proposed Project would not have a substantial adverse effect on a scenic vista (Significance Criterion a).

The second aesthetic significance criterion is: Would the proposed Project substantially damage off-Reservation scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? The proposed project would add an additional hotel on the western side of the Viejas Casino commercial complex within an existing parking lot. The proposed hotel is entirely located on the Reservation and would have no impact on any scenic resources such as trees, rock outcroppings or historic buildings within a designated or eligible state scenic highway. Thus, there would be no impact to off-reservation scenic resources.

The proposed Project would not substantially damage off-Reservation scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (Significance Criterion b).

Finally, the third aesthetic significance criterion is: Would the proposed Project create a new source of substantial light or glare, which would adversely affect day or nighttime views of historic buildings or views in the area? The proposed hotel windows would be vertical in orientation, and located below the elevation of potential viewers at the key viewpoints 1 (VP-C), 2 (VP-K) and 3 (VP-G) and thus, any sun-related glare from either the rising or setting sun would reflect at an angle below viewers at those viewpoints. The project site is located approximately 17 miles from Mt. Laguna Observatory, and so is categorized as within "Zone B" of the light pollution code. This code allows for illumination of the hotel building by low-pressure sodium lighting, other lighting of 4050 lumens and below, and/or luminous tube lighting. Per the Code, the Class III (decorative lighting) would need to be turned off between 11:00 p.m. and sunrise (Sec. 59.108 D). Hotel lighting at the Reservation would continue to comply with the County's Light Pollution Code, Sec. 59.101, County of San Diego Zoning Ordinance Section 6320, 6322 and 6324, and Title 24 of the California Code of Regulations. The viewshed for the project did not include historic buildings. Thus, there would be a less than significant impact to day or nighttime views of historic buildings or views in the area.

The proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views of historic buildings or views in the area (Significance Criterion c).

4.1.4 Cumulative Impact Analysis

The list of cumulative projects in the community of Alpine are provided in Table 2-2 of this TEIR.

None of the identified cumulative projects in Table 2-2 would be visible from within the hotel project viewshed, so there would be no cumulative visual impacts associated with the hotel project when considered with these other cumulative projects. It is possible that in the future additional commercial developments would be identified and pursued within Viejas Reservation. Also, additional commercial developments may be implemented in the private lands located between the Reservation and the East Willows Interchange to I-8, in accordance with the proposed FCI GPA. As no development plans have been presented, it is unknown at this time, how the planned development may visually impact the area.

The proposed Project would not result in a cumulative visual aesthetic impact.

4.1.5 Conclusions

No significant visual or aesthetic impacts to off-Reservation public viewpoints or identified sensitive vistas would occur as a result of the proposed Project.

4.1.6 Mitigation Measures

Visual impacts are less than significant. However, the following avoidance and minimization measure will be implemented to ensure consistency with the Intergovernmental Agreement (Viejas, 2005):

A-1 Hotel lighting will comply with the County's Light Pollution Code, Sec. 59.101 through 59.115

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4.2 Air Quality

Information contained in this section is summarized from the *Air Quality Study, Viejas Casino and Resort Phase 3 Project* prepared by Birdseye Planning Group (June, 2016a), provided in Appendix C to this TEIR.

4.2.1 Existing Conditions

Regulatory Setting

Air pollutants are regulated at the national, State, and air basin level and each agency has a different degree of control. The United States Environmental Protection Agency (USEPA) regulates at the national level; the California Air Resources Control Board (CARB) regulates at the State level; and the San Diego Air Pollution Control District (SDAPCD) regulates air quality in San Diego County. The Viejas Reservation is located in the San Diego Air Basin (SDAB), which is under the jurisdiction of the SDAPCD.

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health.

California Air Resources Board

CARB is responsible for ensuring implementation of the California Clean Air Act (CCAA), meeting state requirements of the federal Clean Air Act and establishing California Ambient Air Quality Standards (CAAQSs). It is also responsible for setting emission standards for vehicles sold in California and for other emission sources such as consumer products and certain off-road equipment. CARB also established passenger vehicle fuel specifications and oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level. Both state and federal standards are summarized in Table 4.2-1. The federal "primary" standards have been established to protect the public health. The federal "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soil, water, visibility, materials, vegetation, and other aspects of the general welfare.

San Diego Air Pollution Control District

The SDAPCD was created to protect the public from the harmful effects of air pollution, achieve and maintain air quality standards, foster community involvement and develop and implement cost-effective programs that meet state and federal mandates while considering environmental and economic impacts.

Specifically, the SDAPCD is responsible for monitoring air quality and planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards in the district. Programs developed include air quality rules and regulations that regulate stationary source emissions, including area sources, point sources, and certain mobile source emissions. The SDAPCD is also responsible for establishing permitting requirements for stationary sources and ensuring that new, modified or relocated stationary sources do not create net emissions increases; and thus, are consistent with the region's air quality goals. The SDAPCD provides significance thresholds in Regulation II, Rule 20.2, Table 20-2-1. “AQIA Trigger Levels.” These trigger levels were established for stationary sources of air pollution and are commonly used for environmental evaluations. The SDAPCD enforces air quality rules and regulations through a variety of means, including inspections, educational or training programs, or fines, when necessary.

Table 4.2-1
Current Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standards	California Standard
Ozone	1-Hour	---	0.09 ppm
	8-Hour	0.070 $\mu g/m^3$	0.070 $\mu g/m^3$
PM_{10}	24-Hour	150 $\mu g/m^3$	50 $\mu g/m^3$
	Annual	---	20 $\mu g/m^3$
$PM_{2.5}$	24-Hour	35 $\mu g/m^3$	---
	Annual	12 $\mu g/m^3$	12 $\mu g/m^3$
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	24-Hour	---	0.04 ppm
	3-Hour	0.5 ppm (secondary)	---
	1-Hour	0.075 ppm (primary)	0.25 ppm
Lead	30-Day Average	---	1.5 $\mu g/m^3$
	3-Month Average	0.15 $\mu g/m^3$	---

ppm = parts per million
$\mu g/m^3$ = micrograms per cubic meter
Source: Birdseye Planning Group, 2016a

State Implementation Plan/Air Quality Management Plan/Regional Air Quality Strategy

The federal Clean Air Act Amendments mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. SIPs are comprehensive plans that describe how an area will attain national and state ambient air quality standards. SIPs are a compilation of new and previously submitted plans, programs (i.e., monitoring, modeling and permitting programs), district rules, state regulations and federal controls and include pollution control measures that demonstrate how the standards will be met through those measures.

The most recent SIP for San Diego County was submitted in 2012 requesting the USEPA redesignate the SDAB a maintenance area for the 1997 federal 8-hour ozone standard. The SIP was adopted by CARB in 2012 and is awaiting USEPA approval.

The San Diego Regional Air Quality Strategy (RAQS) was developed pursuant to CCAA requirements. The RAQS was initially adopted in 1991 and the 2016 RAQS revisions are pending. The RAQS identifies feasible emission control measures to provide progress in San Diego County toward attaining the State ozone standard. The pollutants addressed in the RAQS are volatile organic compounds (VOC) and oxides of nitrogen (NOx), precursors to the photochemical formation of ozone (the primary component of smog). At present, no attainment plan for particulate matter less than 10 microns in diameter (PM_{10}) or particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) is required by the state regulations; however, SDAPCD has adopted measures to reduce particulate matter in San

Diego County. These measures range from regulation against open burning to incentive programs that introduce cleaner technology.

Projects that propose development consistent with the growth anticipated by the San Diego Association of Governments (SANDAG) and the County would be consistent with the RAQS. In the event that a project would propose development which is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections, the project might conflict with the RAQS and SIP; and thus, have a potentially significant impact on air quality.

Under state law, the SDAPCD is required to prepare an Air Quality Management Plan (AQMP) for pollutants for which the SDAB is designated non-attainment. Each iteration of the SDAPCD's AQMP is an update of the previous plan and has a 20-year horizon. Currently the SDAPCD has implemented a 2012 8-hour National Ozone Implementation/Maintenance Plan, a 2007 8-hour Ozone Plan, and a 2004 Carbon Monoxide Plan.

Regional Climate

The weather of San Diego County is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average minimum temperature for January ranges from the mid-40s to the high-50s degrees Fahrenheit (4 to 15 degrees Celsius) across the county. July maximum temperatures average in the mid-80s to the high-90s degrees Fahrenheit (high-20s to the high-30s degrees Celsius). Most of the county's precipitation falls from November to April, with infrequent (approximately 10 percent) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches (254 millimeters); the amount increases with elevations as moist air is lifted over the mountains.

In conjunction with the two characteristic day/night onshore/offshore wind patterns, there are two types of temperature inversions (reversals of the normal decrease of temperature with height), which occur within the region that affect atmospheric dispersive capability and that act to degrade local air quality. In the summer, an inversion at about 1,100 to 2,500 feet (335 to 765 meters) is formed over the entire coastal plain when the warm air mass over land is undercut by a shallow layer of cool marine air flowing onshore. The prevailing sunny days in this region further exacerbate the smog problem by inducing additional adverse photochemical reactions. During the winter, a nightly shallow inversion layer (usually at about 800 feet or 243 meters) forms between the cooled air at the ground and the warmer air above, which can trap vehicular pollutants. The days of highest Carbon Monoxide (CO) concentrations occur during the winter months.

The predominant onshore/offshore wind pattern is sometimes interrupted by Santa Ana conditions, when high pressure over the Nevada-Utah region overcomes the prevailing westerly wind direction. This draws strong, steady, hot, and dry winds from the east over the mountains and out to sea. Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or breakdown of these conditions or if the Santa Ana is weak, prevailing northwesterly winds are reestablished which send polluted air from the Los Angeles basin ashore in the SDAB. Smog transport from the South Coast Air Basin (the metropolitan areas of Los Angeles, Orange, San Bernardino, and Riverside counties) is a key factor on more than half the days San Diego exceeds clean air standards.

Pollutants

The SDAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." San Diego County is listed as a federal non-attainment area for ozone (eight hour) and a state non-attainment area for ozone (one hour and eight hour standards), PM_{10} and $PM_{2.5}$. As shown in Table 4.2-2, the SDAB is in attainment for the state and federal standards for nitrogen dioxide, carbon monoxide, sulfur dioxide and lead.

Table 4.2-2
San Diego County Attainment Status

Criteria Pollutant	Federal Designation	State Designation
Ozone (one hour)	Attainment*	Non-Attainment
Ozone (eight hour)	Non-Attainment	Non-Attainment
Carbon Monoxide	Attainment	Attainment
PM_{10}	Unclassified**	Non-Attainment
$PM_{2.5}$	Attainment	Non-Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(no federal standard)	Attainment
Hydrogen Sulfide	(no federal standard)	Unclassified
Visibility	(no federal standard)	Unclassified

** The federal 1-hour standard of 12 ppm was in effect from 1979 through June 1, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans (SIPs).*

*** At the time of designation, if the available data does not support a designation of attainment or non-attainment, the area is designated as unclassifiable.*

Source: Birdseye Planning Group, 2016

Monitored Air Quality

The SDAPCD monitors air quality conditions at locations throughout the SDAB. For the purpose of this analysis, data from the Alpine-Victoria Drive monitoring station in east San Diego County were used to characterize existing ozone and $PM_{2.5}$ conditions in the vicinity of the project site. Data from the El Cajon Redwood Avenue monitoring station are reported to characterize PM_{10} concentrations. A summary of the data recorded at the Alpine-Victoria and El Cajon Redwood Avenue monitoring stations from 2013 through 2015 is presented in Table 4.2-3.

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children; the elderly; persons engaged in strenuous work or exercise and people with cardiovascular and chronic respiratory diseases. The scope of this analysis focuses on potential impacts to off-Reservation sensitive receptors. The nearest receptors are single-family residences located: on the south side of Willows Road approximately 1,750 feet southeast of the proposed construction area; northwest approximately 1,400 feet from the construction area; and, along Willows Road approximately 4,500 west of the construction area.

Table 4.2-3
Ambient Air Quality Data

Pollutant	2013	2014	2015
Ozone, ppm - Worst 8-Hour Average (ppm)	0.083	0.082	0.085
Number of days of State 1-hour exceedances (>0.09 ppm)	27	30	31
Number of days of Federal exceedances (>0.070 ppm)[1]	6	10	11
Particulate Matter <10 microns, $\mu g/m^3$ Worst 24 Hours	41.1	47	*
Number of samples of State exceedances (>50 $\mu g/m^3$)	0	-	-
Number of samples of Federal exceedances (>150 $\mu g/m^3$)	0	-	-
Particulate Matter <2.5 microns, $\mu g/m^3$ Worst 24 Hours	20.1	17.4	18.8
Number of samples of State exceedances (>50 $\mu g/m^3$)	-	-	-
Number of samples of Federal exceedances (>150 $\mu g/m^3$)	0	0	-

[1] – Federal O3 standard reduced from 75 ppm to 70 ppm in October, 2015
*No data
-Insufficient data to determine number of exceedance
O_3 and $PM_{2.5}$ data from the Alpine Victoria Road monitoring station located at 2300 Victoria Drive
PM_{10} data from the El Cajon monitoring station located at 1155 Redwood Avenue
Source: Birdseye Planning Group, 2016.

4.2.2 Guidelines for Determination of Significance

Air quality modeling was performed in general accordance with the methodologies outlined in the SDAPCD 2009 RAQS to identify both construction and operational emissions associated with the proposed project. All emissions were calculated using the California Emissions Estimator Model (CalEEMod) software version 2013.2.2 which incorporates current air emission data, planning methods and protocol approved by CARB.

Construction activities such as clearing, grading and excavation would generate diesel and dust emissions. The use of construction equipment would generate criteria air pollutant emissions. For modeling purposes, it was assumed that all construction equipment used would be diesel-powered. Construction emissions associated with development of the proposed project were quantified by estimating the types of equipment (including the number) that would be used on-site during each of the construction phases as well as off-site haul trips to remove demolition debris. Construction emissions are analyzed using the regional thresholds established by the SDAPCD and published under Rule 20-2.

Operational emissions include mobile source emissions, energy emissions and area source emissions. Mobile source emissions are generated by motor vehicle trips associated with operation of the project. Emissions attributed to energy use include electricity and natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, use of consumer products and painting. To determine whether a regional air quality impact would occur, the increase in emissions would be compared with the SDAPCD recommended regional thresholds for operational emissions.

Thresholds of Significance. Based on Appendix B of the 2014 Compact, a project on the Reservation would have a significant air quality impact if it would:

a) *Conflict with or obstruct implementation of the applicable air quality plan;*

b) *Violate any air quality standard or contribute substantially to an existing or projected air quality violation;*

c) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);*

d) *Expose off-Reservation sensitive receptors to substantial pollutant concentrations; or*

e) *Create objectionable odors affecting a substantial number of people off-Reservation.*

The SDAPCD has established thresholds in Rule 20.2 for new or modified stationary sources. San Diego County's Guidelines for Determining Significance (County of San Diego, 2007a) incorporate screening level thresholds from Rule 20.2 for use in all County related Air Quality Impact Assessments (AQIA) and for determining California Environmental Quality Act (CEQA) air quality impacts. These screening criteria can be used to demonstrate that a project's total emissions would not result in a significant impact. Further, because SDAPCD does not have AQIA threshold for Volatile Organic Compounds (VOCs), it is acceptable to use the Coachella Valley VOC threshold from South Coast Air Quality Management District. Should emissions be found to exceed these thresholds, additional modeling is required to demonstrate that the project's total air quality impacts are below the state and federal ambient air quality standards. These screening thresholds for construction and daily operations are shown below:

75 pounds per day of reactive organic gases (ROG) (ozone precursors)

250 pounds per day NO_x (ozone precursors)

550 pounds per day of CO

100 pounds per day of PM_{10}

55 pounds per day of $PM_{2.5}$

The following significance thresholds apply to long-term operational emissions:

75 pounds per day of ROG

250 pounds per day of NO_X

550 pounds per day of CO

250 pounds per day of Sulfur Oxide (SO_X)

100 pounds per day of PM_{10}

55 pounds per day of $PM_{2.5}$

4.2.3 Analysis of Project Effects and Determination of Significant Impact

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) from soil disturbance and exhaust emissions (NO_x and CO) from heavy construction vehicles. For the purpose of estimating emissions, it was assumed that approximately 5 acres would be disturbed during overall construction; however, 2 acres would be in active construction at any one time. Further, it was assumed that all improvements associated with the hotel/casino would occur within the footprint of the 170-room hotel/casino complex comprising approximately 280,000 square feet. Construction would generally consist of demolition, site preparation, grading, and construction of the proposed building, paving, and the application of architectural coating (painting).

The demolition, site preparation and grading phases would involve the greatest concentration of heavy equipment use and the highest potential for fugitive dust emissions. The project would be required to comply with SDAPCD Rules 52 and 54 which identify measures to reduce fugitive dust and is required to be implemented at all construction sites located within the SDAB. Therefore, the following conditions, which are required to reduce fugitive dust in compliance with SDAPCD Rules 52 and 54, were included in CalEEMod for site preparation and grading phases of construction.

- **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
- **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.
- **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
- **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
- **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Further, the project would require the demolition of approximately 20,000 square feet of the existing casino building and the import of approximately 65,000 cubic yards of soil material for construction of building pads and related improvements. The demolition, site preparation and grading phases were assumed to occur from June through October, 2017 for modeling purposes. The export of demolition debris was assumed to occur during the demolition phase. Soil import was assumed to occur during both the site preparation (30,000 cubic yards) and grading (35,000 cubic yards) phases. Construction is assumed to be completed in December, 2018. In addition to SDAPCD Rules 52 and 54 requirements, emissions modeling also accounts for the use of low-VOC paint (150 grams/liter (g/L) for non-flat coatings) as required by SDAPCD Rule 67. It was assumed painting would occur as the building is constructed rather than as a separate phase in the project schedule. Table 4.2-4 summarizes the estimated maximum daily emissions of pollutants occurring during the construction period.

As shown in Table 4.2-4, construction of the proposed project would not exceed the SDAPCD regional construction emission screening thresholds for daily emissions. **Thus, construction of project would not conflict with the SIP, RAQS or AQMP (significance criterion a), violate an air quality standard or contribute to an existing or projected violation (significance criterion b), result in a cumulatively considerable increase in ozone or particulate matter emissions (significance criterion c) or expose off-Reservation receptors to substantial pollutant concentrations (significance criterion d).**

The proposed project would involve the use of diesel powered construction equipment. It is unlikely that diesel exhaust would be noticeable at adjacent properties as they are not in close proximity; and, construction activities would be temporary. **Therefore, construction impacts would not create objectionable odors affecting a substantial number of people and significance criterion e would be less than significant.**

Table 4.2-4
Estimated Maximum Daily Construction Emissions

Construction Phase	Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	PM_{10}	$PM_{2.5}$
2017 Maximum lbs/day	*11.5*	131.1	99.2	33.1	19.1
2018 Maximum lbs/day	*74.3*	28.7	27.9	2.9	1.9
SDAPCD Screening Thresholds	*75*	*250*	*550*	*100*	55
Threshold Exceeded 2017	**No**	**No**	**No**	**No**	**No**
Threshold Exceeded 2018	**No**	**No**	**No**	**No**	**No**

Source: Birdseye Planning Group.

Long-Term Regional (OPERATIONAL) Impacts

Regional Pollutant Emissions

Table 4.2-5 summarizes emissions associated with operation of the proposed project. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment and evaporative emissions as the structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site. As shown in Table 4.2-5, the net

change in emissions would not exceed the SDAPCD screening thresholds for ROG, NO_X, CO, SO_X, PM_{10} or $PM_{2.5}$. **Therefore, the project's regional air quality impacts (including impacts related to criteria pollutants (criteria a and b), sensitive receptors (criterion d) and violations of air quality standards (criterion b) would be less than significant.**

Table 4.2-5
Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project						
Area	6.5	0.01	0.01	0	0.01	0.01
Energy	0.44	4.03	3.38	0.02	0.3	0.3
Mobile	4.0	7.44	35.7	0.08	5.69	1.5
Maximum lbs/day	**11.4**	**11.4**	**39.14**	**0.10**	**6.0**	**1.8**
SDAPCD Thresholds	**55**	**40**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Birdseye Planning Group.

Objectionable Odors

The project does not include industrial or agricultural uses that are typically associated with objectionable odors. **Therefore, operational impacts associated with objectionable odors (criterion e would be less than significant.**

Local Carbon Monoxide Emissions

CO is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of state and federal CO standards. At the monitoring station located in El Cajon –Redwood Avenue, the station closest to project site that provides CO data, the maximum 8-hour average CO level recorded in 2012 (the last year data were recorded) was 1.86 parts per million (ppm). Concentrations are below the 9 ppm state and federal 8-hour standard.

Although CO is not a regional air quality concern in SDAB, elevated CO levels can occur at or near intersections that experience severe traffic congestion. A project's localized air quality impact is considered significant if the additional CO emissions resulting from the project create a "hot spot" where the California 1-hour standard of 20.0 ppm or the 8-hour standard of 9 ppm is exceeded. This can occur at severely congested intersections during cold winter temperatures. Screening for possible elevated CO levels is recommended for severely congested intersections experiencing levels of service E or F with project traffic where a significant project traffic impact may occur. Specifically, project-related traffic that would worsen the LOS at intersections operating at LOS E or F, would be subject to a detailed evaluation. If not, no further review is necessary.

As discussed in the Traffic Impact Analysis (Linscott Law & Greenspan, 2016), during cumulative conditions, the signalized intersections surrounding the site would operate at LOS D or better with the project. The proposed project would have no adverse impact on traffic operations; **thus, off-Reservation receptors would not be exposed to substantial pollutant concentrations (criterion d related to CO hotspots. No further evaluation with respect to CO hotspots is required.**

SIP/AQMP/RAQS Consistency

As noted, the RAQS relies on information from CARB and SANDAG, including projected growth in the County, mobile, area and all other source emissions to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the growth anticipated by the general plan is consistent with the SIP, AQMP and RAQS. The proposed project involves the construction/expansion of a casino/hotel within unincorporated San Diego County. The project would not add housing; however, new jobs would be created. Based on the type of jobs created, it is assumed that these would be filled by the local labor force rather than require relocation of workers from outside the region. **Therefore, operation of the proposed project would not increase the local population; and thus, would be consistent with the SIP, AQMP and RAQS; thus impacts related to significance criterion a would be less than significant.**

4.2.4 Cumulative Impact Analysis

This Project proposes development that is consistent with the growth anticipated by SANDAG and the County and is therefore consistent with the SIP, AQMP and RAQS and will not have accumulative air quality impact.

4.2.5 Conclusions

Air quality impacts are less than significant.

4.2.6 Mitigation Measures

No air quality mitigation measures are required. The Tribe will continue to abide by mitigation measures outlined in the Intergovernmental Agreement (Viejas, 2005) relating to dust suppression, low emission construction equipment, buses/shuttles and employee carpooling. The following conditions, which are required to reduce fugitive dust in compliance with SDAPCD Rules 52 and 54, will be adhered to for site preparation and grading phases of construction.

AQ-1 Minimization of Disturbance. Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.

AQ-2 Soil Treatment. Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.

AQ-3 Soil Stabilization. Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

AQ-4 No Grading During High Winds. Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).

AQ-5 Street Sweeping. Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

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4.3 Groundwater Availability

Information contained in this section is summarized from the *Supporting Water Supply Evaluation, Viejas Casino & Resort – Phase 3* prepared by Environmental Navigation Services, Inc. (2016) as provided in Appendix D to this TEIR.

4.3.1 Existing Conditions

A. Viejas Creek Watershed

The 1,600 acre Viejas Indian Reservation is centrally located within the 5,750 acre Viejas Creek Watershed ranging from Viejas Mountain in the west, to Chiquito Peak on the east, from Poser Mountain in the north, to the hills south of I-8 in the south as shown in Figure 4.3-1. Viejas is surrounded by publicly and privately-owned properties. Viejas Creek is centered in Viejas Valley, drains to the west, and exits the western side of the Reservation. A series of tributary drainages that flow into Viejas Valley provide seasonal flows that accumulate within central portion of the valley. The watershed is defined by the western boundary of the Reservation (Figure 4.3-1).

The strongly-eroded Viejas stream channel was rehabilitated by Viejas in the 1980s and 1990s to facilitate groundwater management, restore riparian habitat, and accommodate commercial development. A series of check dams/retention basins were constructed to manage stormwater flows, to reduce erosion, support the riparian habitat restoration, and to enhance groundwater recharge. The rehabilitation was very successful and the lower (western-most) portion of the channel contains perennial water and a thriving riparian habitat.

The overall groundwater system is comprised of an unconfined aquifer system within alluvium and decomposed granite overlying granitic bedrock. The hillsides are comprised of granitic rock with a thin veneer of soils. The bedrock in the area is described as Mesozoic age granitic rock (between 65 to 248 million years old). The eastern portion of the watershed contains gabbroic rock. Granite and gabbro are crystalline igneous rocks that have visible mineral grains in the rock.

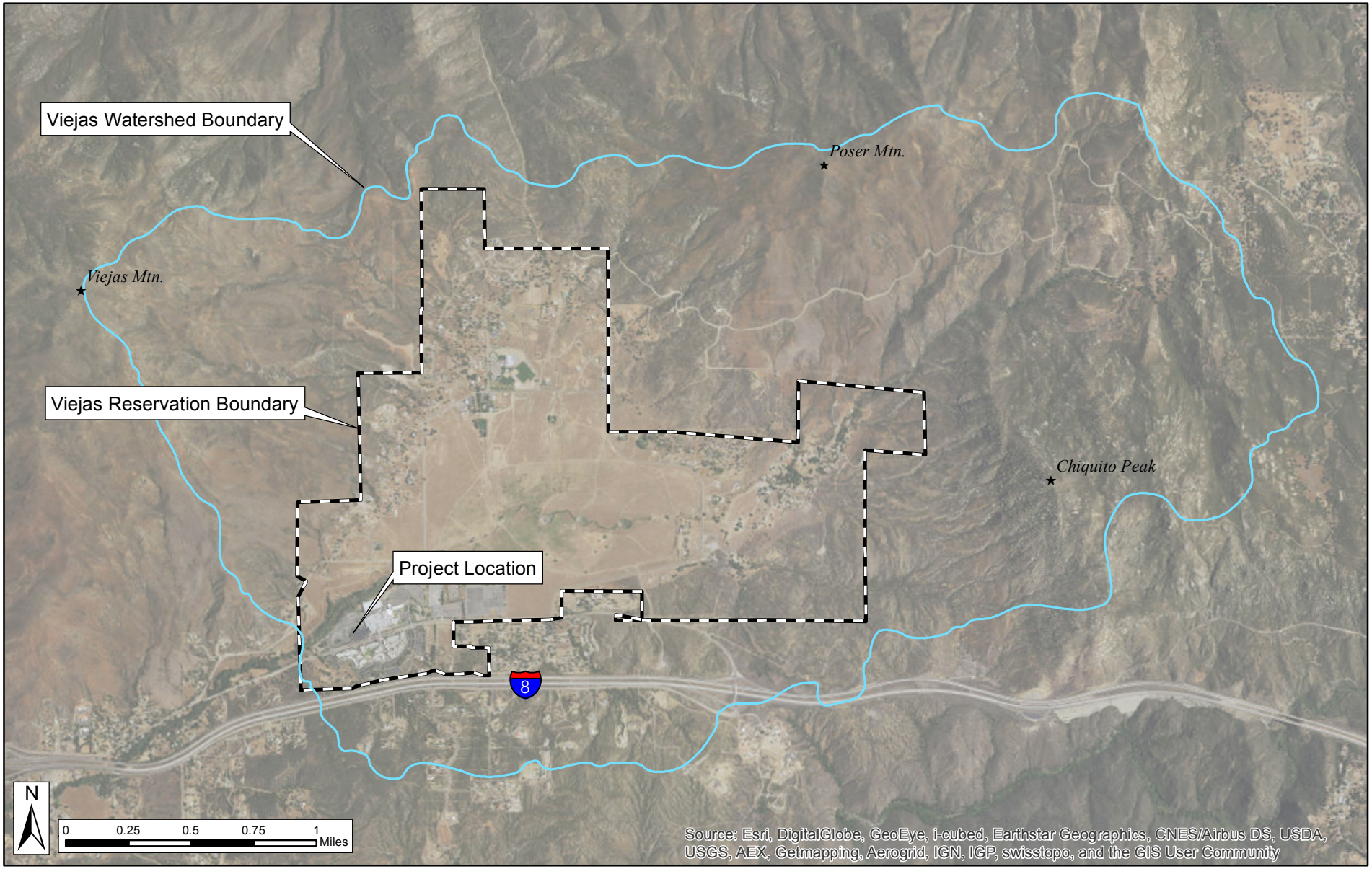
The soils within the Viejas Valley reflect the infilling of the valley by soils and alluvium derived from the hillside drainages. Soil types are discussed in Appendix D.

B. Groundwater Use and Production

<u>Water Use</u>

Water use measurements have been made by Viejas for the North and South Tower hotels and the data through January 2016 were used to project water demand for the Phase 3 hotel.

The North Tower hotel opened for business March 21, 2013 and includes 128 rooms. The South Tower hotel opened for business October 31, 2015 and includes 109 rooms. Monthly water meter data were obtained from the Viejas Department of Public Works (DPW). These data support an average daily rate of 143 gallons per room for the North Tower for a 31 month period (an average total of 20.4 acre-feet/year (AcFt/yr). Three months of data obtained for the South Tower support a similar per room use rate. The hotel pool located between the North and the South Towers used an average of 2.4 AcFt/yr during 2014 and 2015. Thus the observed average annual water demand for the 128 room North Tower hotel and pool was 22.8 AcFt/yr.



SOURCE: Environmental Navigation Services, Inc., 2016; BRG Consulting, Inc., 2016

8/9/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Viejas Watershed

FIGURE 4.3-1

Water Production

Viejas operates a series of production wells located across the Reservation to provide potable water for commercial, tribal, and residential use. Seven production wells are currently in use. The wells produce water at rates of approximately 40 to 300 gallons per minute (gpm), depending on the well capacity and pumps installed in the wells. The well locations are distributed across the Reservation.

All of the wells are operated at the same time and used to fill a series of storage tanks. Pumping ceases in all wells when the tanks are full. As a result the wells are cyclically operated, with an average operation time ranging from approximately 25 to 50% depending on seasonal demands.

Water and wastewater production and use data were compiled from Viejas' DPW reports and records. A summary is presented in Table 4.3-1. Review of the data shows that groundwater pumping rates have increased by approximately 3 to 9 percent from the base year of 2012 prior to hotel operation.

Table 4.3-1
Viejas Water Use Summary 2012 through 2015

	2012	2013	2014	2015
Total Groundwater Pumping	300 AcFt	312 AcFt	309 AcFt	327 AcFt
Treated Water Produced (Reclaimed)	144 AcFt	158 AcFt	154 AcFt	175 AcFt
Reclaim Irrigation	91 AcFt	86 AcFt	85 AcFt	65 AcFt
Percent of Reclaim Use	63%	54%	55%	37%
Excess Discharged to Percolation Basin	53 AcFt	72 AcFt	69 AcFt	110 AcFt
Annual Evaporation, Percolation Basin	0.84 AcFt	0.84 AcFt	0.84 AcFt	0.84 AcFt
Net Recharge	52 AcFt	71 AcFt	68 AcFt	109 AcFt
Recharge as Percent of Water Production	17%	23%	22%	33%
Net Pumping	248 AcFt	241 AcFt	241 AcFt	218 AcFt
Pumping Increase vs. 2012 (without recharge)		12 AcFt	9 AcFt	27 AcFt
Percent Increase Since 2012		4%	3%	9%
Reclamation Production Increase vs. 2012		14 AcFt	10 AcFt	31 AcFt
Percent Reclaimed (incremental vs. 2012)		117%	111%	115%

Notes: 1. Underline indicates Revised versus the 2014 TEIR. (Pumping rates based on monthly totalizers, prior were timer-based estimates)
2. Evaporation (ET) Loss assumes 62.5 inches/yr (CIMIS Zone 16) from a 7,000 ft basin
3. North Tower Hotel and Pool opened March 2013
4. South Tower Hotel opened October 31, 2015
5. Reclaim water use decreased in 2015 `20 AcFt due to intentional reductions in irrigation
6. Percentages greater than 100% indicate that incrementally more water was reclaimed than was pumped as a result of improvements in the Reservation-wide water reclamation system.
7. AcFt = acre-feet.
Source: Environmental Navigation Services, 2016.

Groundwater pumping rates have been revised since the Viejas Hotel South Tower TEIR (Viejas, 2014b) and are judged to be more accurate. Prior estimates were calculated on a per well basis from pump run times and estimated flow rates. Totalizer data are now being collected for all wells and the monthly readings were used to determine the groundwater pumping rates for 2012 to 2015. Daily flow data from the wastewater treatment plant were used to calculate the rate of reclaimed water production and flow totalizers are being used to track reclaimed water use across the Viejas Reservation.

Reclaimed Water Production and Use, and Excess Recharge 2012-2015

All of the commercial operations, all of the Tribal government buildings, and nearly all of the residences on the Reservation are supported by a wastewater treatment system operated by the Viejas DPW. The wastewater is treated in a closed membrane filtration treatment system that minimizes water loss. Following treatment the reclaimed water becomes available for non-potable, irrigation uses consistent with the Intergovernmental Agreement (Viejas, 2005). Wastewater production and use rates for 2012 to 2015 are summarized in Table 4.3-1. Viejas' wastewater system output has increased from 144 to 175 AcFt/year since 2012, reflecting their successful wastewater reclamation program.

A large portion of the treated wastewater is discharged to a percolation basin where it is allowed to infiltrate. Evaporative losses are included in Table 4.3-1, conservatively assuming that the basin is full of water all year and that evaporation occurs across the entire percolation basin.

Discussions with Viejas DPW staff indicate that the use of reclaimed water for irrigation has been maximized and reclaimed water is being used to the extent practicable to supply existing demands. Also, the volume of water available to recharge groundwater has increased due to increased wastewater production. It is assumed that all of the additional reclaimed water produced by the Project, that is not used for Project irrigation, will similarly be discharged to the percolation basin.

2012 data are used as a baseline in Table 4.3-1 to compare groundwater pumping increases to the corresponding change in reclamation water production rates for 2013 to 2015. The increased pumping is being captured by return flows to the wastewater treatment plant as shown by comparison of the changes in pumping versus the changes in reclaimed water production.

A 95% reclamation rate has been assumed for hotel water usage. The current percentage of reclaimed water being used is approximately 37%. Reclaimed water that is not used is recharged.

C. Groundwater Recharge Rate

Recharge is water that goes through the soil and replenishes the aquifer system. The recharge rate depends on the amount and rate of rainfall, the residence time of the water at the ground surface, evaporation and plant transpiration losses (evapotranspiration), and the ability of the soil to retain and transmit water to the aquifer.

Various methods can be used to estimate recharge. For example, the County of San Diego prepared generalized basin-by-basin calculations for ground water-dependent areas in the General Plan Update (County of San Diego, 2011a; Appendix D). The County recharge analysis uses a minimum 30-year monthly rainfall data series (1971 to 2005) to examine changes in rainfall based on a soil moisture balance methodology. In essence recharge is evaluated based on whether enough rainfall occurs in a month period to sufficiently wet the soil, cause the soil to exceed its soil moisture capacity, and to allow water to flow through the soil column to the underlying aquifer system.

A large percentage of the rainfall is assumed to not be available for recharge because it is either lost as evapotranspiration or as run-off. The soil moisture balance approach does not consider surface water retention as a source of recharge. Viejas has constructed a series of check dams/retention basins along Viejas Creek to manage stormwater flows, to reduce erosion, enhance groundwater recharge, and support the riparian habitat restoration. A

soil moisture balance recharge calculation methodology will underestimate recharge for the Viejas Reservation because it cannot account for reduced runoff, surface water storage, and associated enhanced recharge along Viejas Creek.

Brown & Caldwell (2001) estimated that ground water recharge of the basin would be 0.12 AcFt/acre per year for the Viejas watershed during a year with average annual rainfall. When this is adjusted for water retention, the recharge rate is 0.16 AcFt/acre resulting in a recharge of 920 AcFt/year for the Watershed.

The recharge rate is considered to be a conservative estimate to be used for screening-level purposes. It is subject to revision- actual recharge rates are expected to be significantly higher within the Reservation as result of Viejas' stream channel modifications and riparian habitat management program that benefit on- and off-Reservation water resources. The results of ongoing measurements by the Viejas Band supports that the check dams and riparian habitat management practices are highly effective, have raised groundwater levels, and provide drought-period benefits both on-Reservation and to adjacent off-Reservation properties.

D. Groundwater Storage Estimates

Groundwater is a renewable resource- rainfall recharges the aquifer system and replaces the water pumped out of the ground. During drought periods, the aquifer system provides for storage of groundwater in the absence of recharge. The amount of groundwater in subsurface storage depends on the ability of subsurface materials to hold water. Groundwater in subsurface storage is estimated based on a generally-accepted 10% storage coefficient for alluvium, 5% storage coefficient for decomposed granite (DG) (weathered bedrock), and a storage coefficient of 0.1% in moderately fractured bedrock.

The calculated storage is an average of 0.45 AcFt/acre over the watershed, or 2,852 AcFt of storage for the 5,750 acre watershed.

E. Sustainable Yield

According to Brown & Caldwell (2001), "The unit recharge rate was developed from precipitation data collected over many years. Therefore, the 690 AcFt/yr [value] should be considered a long-term average recharge rate." "[F]or planning purposes, the safe yield is nominally taken as being equal to the recharge rate for a particular year." Therefore, based on the foregoing definition, the average safe yield for the Viejas basin would be approximately 690 AcFt/yr. Brown & Caldwell provided a minimum basin safe yield of 450 AcFt/yr for the entire 5,750 acre watershed. For comparison, this is equivalent to approximately half of the calculated annual average recharge value of 920 AcFt/yr.

An alternative definition of safe yield generally used for water supply assessments by the County is based on the maximum sustainable pumping rate that will not cause the aquifer to have less than 50% of its total capacity at any time. The long-term available water supply is evaluated by using the historical rainfall record to calculate monthly groundwater recharge rates. The critical periods occur during prolonged drought periods and typically end with "El Niño"-type (above average) rainfall when the rainfall recharge replaces the groundwater that is used by pumping. In this case the methodology was used for the period of 1971 to 2015 to determine the maximum long-term pumping

rate that can be sustained without causing the amount of water stored in the aquifer to drop to an amount equal to 50% of the total aquifer capacity.

Using the County methodology based on rainfall data from 1971 to 2015 the sustainable yield is estimated to be 504 AcFt/yr, a value that is similar to the estimate of 450 AcFt/yr provided by Brown & Coldwell and used in prior TEIRs (Viejas, 2012 and Viejas, 2014b).

4.3.2 Guidelines for Determination of Significance

Exhibit B of the 2014 Compact utilizes the following guideline for determination of significance related to potential groundwater impacts. Therefore, for purposes of this TEIR, a significant groundwater availability impact would occur if implementation of the proposed Project would:

a. Substantially deplete off-Reservation groundwater supplies or interfere substantially with groundwater recharge such that there should be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

A cumulative depletion of water in subsurface storage of greater than 50% of the aquifer is judged to be a significant impact per County Significance Guidelines for groundwater (County of San Diego, 2007b).

4.3.3 Analysis of Project Effects and Determination of Significant Impact

A. Water Demand

The rooms in the Phase 3 hotel are larger in design than existing hotel rooms and include spa-style bathtubs. An estimated water demand of 175 gallons per day per room (an annual average of 33.3 AcFt/yr) is used in this analysis to allow for the potential increases in water use. Effectively all of the hotel water demand is for interior use with minimal water loss. Consistent with prior reports, a value of 95% is assumed for the return wastewater flow rate. The new spa and pool area will also have potable water demands. The pool water use is conservatively assumed to be fully consumptive; however, a portion of the water used for pool maintenance is sewered.

The Project includes approximately 180,000 sq ft of landscape area that can be irrigated by reclaimed water. Water demands are estimated based on 25% of the landscape area with a high demand (e.g. turf), and the remaining 75% being constructed with low water demand native xeriscape plantings. Water demand is summarized in Table 4.3-2.

B. Water Level Decline Resulting from Groundwater Pumping

The change in water level (drawdown) that occurs within an aquifer associated with pumping at a given well decreases with distance away from the well. At the well, a small increase in the pumping rate will give rise to a proportional decrease in water level- here expected to be less than five percent. With distance the drawdown decreases rapidly (exponentially) and forms what is referred to as the cone of depression.

The water production wells are used to supply a single water supply system that serves private and commercial users on the Reservation. The proposed Project will be included in the Viejas water and wastewater system. Water from the all of the supply wells is combined, and the Project water demand will be spread across all of the wells.

A five percent (or more) long-term decrease in water levels and hence long-term pumping rates is judged to be significant. Data from 2013 to 2015 primarily obtained during the operation of the North tower hotel that opened March 2013 show that while potable water use has increased, net groundwater pumping rates did not increase due to increased recharge of reclaimed water. Net pumping has decreased since 2012 from 248 to 218 AcFt/yr (Table 4.3-1).

The projected annual net Project demand is estimated to be 12 AcFt (see Table 4.3-2), with a wastewater reclamation rate of 95% for interior water uses. Given the net increase in groundwater use associated with the hotel is 5% over 2015 pumping rates, it is unlikely that water levels in off-Reservation wells will experience significant water level impacts due to the Project.

Table 4.3-2
Project Water Demand

Component	Demand			Source		Reclamation Rates	
	Rate	Units	Gallons/yr	AcFt/yr, Pumped GW	AcFt/yr, Reclaimed WW	Reclaim Rate	Reclaim AcFt
170 room hotel	175	gpd/room	10,858,750	33.3		95%	31.7
Landscape Irrigation (180,000 sq ft)							
High water demand, 25% area/80% ET	4.16	ET AcFt/Ac (80%)	1,400,256		4.3	0%	
Low water demand, 75% area/25% ET	1.30	ET AcFt/Ac (25%)	1,312,740		4.0	0%	
Pool (4,000 ft^2, 0.092 Ac, 4 ft deep)	1.7	AcFt/yr: 2 refills + 2x ET	551,113	1.7		0%	0.0
Spa: 100 patrons	20	gpd/patron	730,000	2.2		95%	2.1
TOTALS				**37.3**	**8.3**		**33.8**
Net Use, AcFt/yr	11.8 = (pumping rate – excess reclaimed water that is recharged)						
	5% approximate change in net pumping from 2015 (was 218). Threshold is 5%.						

Note: (ET rate is 5.2 ft/yr, CIMIS zone 16)
Source: Environmental Navigation Sciences, 2016.

The presence of the perennial portion of Viejas Creek, sustained by the groundwater management and riparian habitat restoration work, provides hydraulic conditions that reduce the potential effect of off-Reservation water level changes. In simple terms Viejas' production wells preferentially draw water from the on-Reservation portion of the aquifer being recharged by the creek. This effect, known as a hydrologic boundary condition, will significantly reduce the potential for off-Reservation wells to be impacted by on-Reservation pumping.

C. Aquifer Depletion Relative to Groundwater Extraction Rates

A cumulative depletion of water in subsurface storage of greater than 50% of the aquifer capacity is judged to be a significant impact per County Significance Guidelines. Here, 50% of storage is estimated to be 1,289 AcFt based on a sustainable long-term pumping rate of 504 AcFt/yr using a soil moisture balance methodology.

A cumulative depletion calculation is done by examining the change in the amount of groundwater in the aquifer over time. Water is extracted from the aquifer at a hypothetical constant rate. Historical rainfall data are used to support calculations of the potential change in groundwater recharge that offset groundwater withdrawal.
The analysis was conducted using a monthly soil moisture water balance as follows:

- The 50% significance criterion occurs when only 1,289 AcFt of water remains in the aquifer.
- The historical rainfall record was obtained from the nearby Alpine weather station. The Alpine rainfall measurements are from a location that has lower rainfall than expected to occur in the Viejas Creek Watershed, however, Alpine data are used as a proxy to approximate groundwater recharge rates.
- Review of the historical rainfall record shows that rainfall rates significantly vary over time. Rainfall variability occurs, in part, due to recognized climatic cycles such as the El Niño / La Niña and the Pacific Decadal Oscillation.
- Recharge is calculated on a monthly basis as a function of rainfall. In general if rainfall is less than the soil moisture capacity, no recharge is assumed to occur. Recharge is also limited by the aquifer capacity- once 'full' no additional water can be stored. The aquifer water balance calculation results show years where this condition occurs.

These assumptions are based on review of other soil moisture balance recharge calculations, intended to be conservative, and to be used only for screening-level purposes. The calculations do not reflect the dry season effectiveness of the check dams along Viejas Creek to retain and recharge stormwater, and are not intended to simulate changes in water levels that may occur at any specific locations within the watershed.

The calculations are summarized on an annual basis for a 'bucket' aquifer using the rainfall record from 1971 to present (45 years). Water is withdrawn at a constant annual rate of 504 AcFt/yr. The pumping rate was adjusted in the calculation so that the minimum aquifer volume is not exceeded.

In summary, the calculations show that a sustainable yield estimate of 504 AcFt/yr is reasonable because the aquifer does not drop below the 50% criterion in the cumulative demand calculations under a sustained pumping rate of 504 AcFt/yr.

D. Groundwater Extraction Rates Compared to Sustainable Yield

The 5,750 acre watershed includes both on- and off-Reservation properties with groundwater demands. The potential future off-Reservation groundwater demands are estimated to be 106 AcFt/yr (Viejas, 2012). Current net on-Reservation groundwater demand is approximately 218 AcFt/yr (Table 4.3-1). The Project is estimated to add 12 AcFt/yr to the net demand. Combined these demands total to 336 AcFt/yr and are less that the long-term sustainable yield of 504 AcFt/yr.

Significance Criterion a: The proposed Project would not substantially deplete off-Reservation groundwater supplies or interfere substantially with groundwater recharge such that there should be a net deficit in aquifer volume or a lowering of the local groundwater table level; therefore a less than significant impact has been identified.

4.3.4 Cumulative Impact

The Project will not have a cumulative impact. When the Project is considered with other existing uses within the Viejas Creek Watershed, there is a sustainable yield estimate of 504 AcFt/yr and the aquifer does not drop below the 50% criterion specified in the cumulative demand calculations.

4.3.5 Conclusions

No significant off-Reservation water availability impacts were identified. The project is consistent with the Intergovernmental Agreement (Viejas, 2005) requiring the Tribe to make reasonable best efforts to continue to use wastewater treatment plant tertiary treated effluent for landscape irrigation purposes. The Supporting Water Supply Evaluation (Appendix D) states that discussions with Viejas DPW staff indicate that the use of reclaimed water for irrigation has been maximized and being used to the extent practicable to supply existing demands. Additionally, reclaimed water produced by the Project will be used for Project irrigation.

4.3.6 Mitigation Measures

Since no significant off-Reservation water supply impacts were identified, no mitigation measures are proposed or required. The Project is consistent with mitigation measures identified in the Intergovernmental Agreement (2005) – see Section 4.3.5 above.

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4.4 Noise

Information contained in this section is summarized from the *Noise Impact Study, Viejas Casino and Resort – Phase 3* prepared by Birdseye Planning Group (2016b) included as Appendix E of this TEIR.

4.4.1 Existing Conditions

A Site Characterization

The proposed Project would construct and operate a third hotel, demolish and reconstruct a portion of the existing Casino and make interior renovations to the existing Casino. All new construction work, renovation and landscaping will occur on existing developed land (existing parking lot and existing Casino) within an approximately 280,000 sq ft project footprint area. The project site is depicted in Figures 2-1 through 2-5.

Construction would generally occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday in accordance with San Diego County Code Section 36.408.

Noise sensitive receptors include residences, hospitals, schools, churches, and hospitals and convalescent care facilities (County of San Diego, 2009).

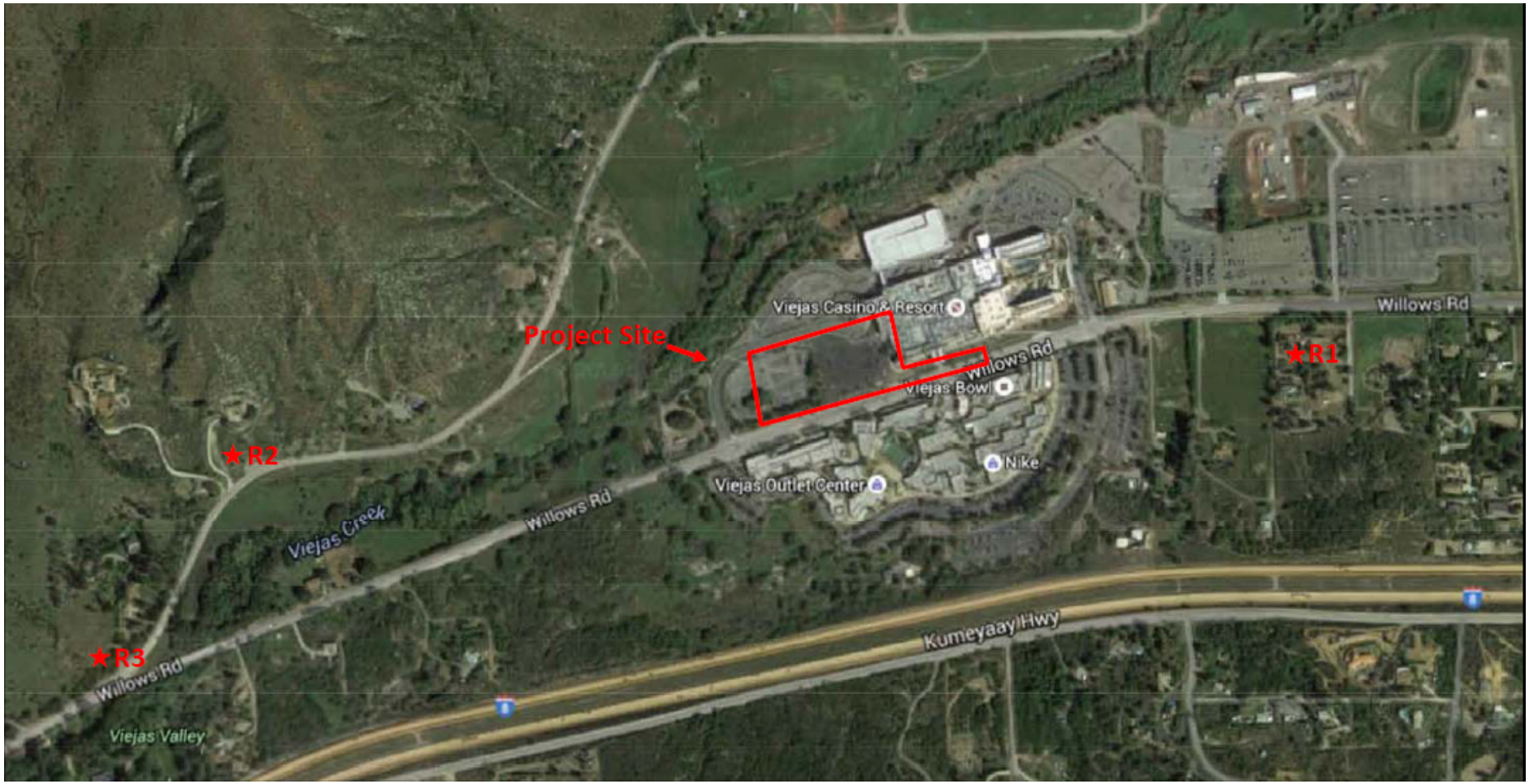
The sensitive receptors in proximity to the project site are all single-family residences and are shown on Figure 4.4-1. The nearest receptor is located approximately 1,400 feet northwest of the site along Viejas Grade Road (R2). The second is a residential property located approximately 1,750 feet southeast of the project site on the south side of Willows Road east of the Viejas Outlet Center (R1). The third is a residential area located along Willows Road adjacent to the western reservation boundary and approximately one mile from the project site (R3).

B Existing Noise

Three weekday morning 15-minute noise measurements were taken in proximity to the project site on April 4, 2016, using an ANSI Type II integrating sound level meter. These noise measurements provide an estimate of the general noise environment at the nearest sensitive properties located off the Reservation (R1, R2 and R3 described above). The only noise source in the area during monitoring was traffic on Willows Road (Monitoring Sites 1 and 3) and Viejas Grade Road (Monitoring Site 2). Monitoring sites are shown in Figure 4.4-2. Table 4.4-1 identifies the noise measurement locations and measured noise levels. As shown, existing noise levels ranged from 68.5 to 52.3 A-weighted decibels equivalent sound level (dBA Leq) during the morning monitoring period. The Leq at the properties along Willows Road closest to the Reservation boundary are 55.5 on the east end of the existing casino resort development and 68.5 on the west end.

C Applicable Rules, Regulations, Policies and Guidelines

The Tribe has not developed or adopted noise standards. The thresholds used in the noise impact study were primarily developed from the following County of San Diego Guidelines for Determining Significance: Noise (County of San Diego, 2009) noise standards and policies.



SOURCE: Birdseye Planning Group, 2016

8/9/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Sensitive Receptors

FIGURE 4.4-1

SOURCE: Birdseye Planning Group, 2016

8/9/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Monitoring Locations

FIGURE 4.4-2

Table 4.4-1
Noise Monitoring Results

Measurement Location	Primary Noise Source	Sample Time	Leq (dBA)
Monitoring Site 1: South side of parking lot 600ft east of existing casino/resort entrance approximately 40 feet from the centerline.	Traffic	Weekday 11:00 – 11:15 a.m.	55.5
Monitoring Site 2: East side of Viejas Grade adjacent to Reservation boundary adjacent to single family residences	Traffic	Weekday 11:45 to 12:00 p.m.	52.3
Monitoring Site 3: South side of Willows Road adjacent to western Reservation boundary and single family residences	Traffic	Weekday 12:15 to 12:30 p.m.	68.5

Source: Birdseye Planning Group, 2016

Regulatory Setting

In 1976, the California Department of Health, State Office of Noise Control published a recommended noise/land use compatibility matrix which many jurisdictions have adopted as a standard in their general plan noise elements. This matrix indicates that residential land uses and other noise sensitive receptors generally should locate in areas where outdoor ambient noise levels do not exceed 65 to 70 dBA community noise exposure level or day-night average sound level (CNEL or Ldn).

County of San Diego Code

The County of San Diego Code has the following noise restrictions.

Section 36.408: Hours of Operation of Construction Equipment

Except for emergency work, it shall be unlawful for any person to operate or cause to be operated, construction equipment:

a. Between 7 p.m. and 7 a.m.

b. On a Sunday or a holiday. For purposes of this section, a holiday means January 1st, the last Monday in May, July 4th, the first Monday in September, December 25th and any day appointed by the President as a special national holiday or the Governor of the State as a special State holiday. A person may; however, operate construction equipment on a Sunday or holiday between the hours of 10 a.m. and 5 p.m. at the person's residence or for the purpose of constructing a residence for himself or herself, provided that the operation of construction equipment is not carried out for financial consideration or other consideration of any kind and does not violate the limitations in sections 36.409 and 36.410.

Section 36.409: Sound Level Limitations on Construction Equipment

Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

Operational Noise

Section 36.404: General Sound Level Limits

Section 36.404 of the County of San Diego noise ordinance provides performance standards and noise control guidelines for determining and mitigating non-transportation, or stationary noise source impacts. The County Noise Ordinance prohibits any person to cause or allow the creation of any noise to the extent that the one-hour average sound level, at any point on or beyond the boundaries of the property exceeds the applicable limits. Section 36.404 of the County of San Diego Code sets a most restrictive operational exterior noise limit for residential noise sensitive land uses of 50 dBA Leq for daytime hours of 7 a.m. to 10 p.m. and 45 dBA Leq during the noise sensitive nighttime hours of 10 p.m. to 7 a.m.

Section 36.410: Impulse Noise

Section 36.410 of the San Diego County Code states that in addition to general limitations on sound levels in section 36.404 and limitations on construction equipment in Section 36.409, except for emergency work or work on a public road project, no person shall produce or cause to be produced an impulsive (short-term, one second or less such as a gunshot, explosion or noise from construction equipment) sound level that exceeds 82 dBA within residential, village zoning or civic use areas when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period, as described in subsection (c). The maximum sound level depends on the use being made of the occupied property.

Subsection (c) states that the minimum measurement period for any measurements conducted under this section shall be one hour. During the measurement period a measurement shall be conducted every minute from a fixed location on an occupied property. The measurements shall measure the maximum sound level during each minute of the measurement period. If the sound level caused by construction equipment or the producer of the impulsive noise, exceeds the maximum sound level for any portion of any minute it will deemed that the maximum sound level was exceeded during that minute.

Impulse noise is typically related to construction where pile driving and use of explosives is required. These construction techniques are not required for the proposed project; thus, impulse noise is not expected to occur during construction or operation of the project.

Vibration Standards

County of San Diego Guidelines provide construction-related vibration thresholds based on those established in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment*. The FTA thresholds are used as guidelines rather than standards; and thus, are discussed below.

4.4.2 Guidelines for Determination of Significance

Exhibit B of the 2014 Compact utilizes the following guidelines for determination of significance related to potential noise impacts. Therefore, for purposes of this TEIR, a significant noise impact would occur if implementation of the proposed Project would:

a. *Result in exposure of off-reservation persons to noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;*
b. *Result in exposure of off-reservation persons to excessive groundborne vibration or groundborne noise levels;*
c. *Result in a permanent increase in ambient noise levels in the off-reservation vicinity of the proposed Project; or,*
d. *Result in a substantial temporary or periodic increase in ambient noise levels in the off-reservation vicinity of the proposed Project.*

Construction-related would be a temporary significant impact it would exceed 75 dBA at off-Reservation receivers.

Where existing/ambient noise levels exceed 50 dBA, the County of San Diego Guidelines for Determining Significance - Noise states an increase of 10 dBA CNEL is considered a significant impact. Because Leq is louder than the CNEL, use of the Leq metric provides a more conservative evaluation of impacts. Because ambient noise levels at the three receptors evaluated exceeds 50 dBA (see Table 4.4-1), project-related traffic noise that exceeds measured noise levels by 10 dBA or more, is considered a significant permanent noise impact.

Noise levels associated with the rooftop heating, ventilation, and air-conditioning (HVAC) system are compared to the 50 dBA day time standard and 45 dBA night time standard for non-transportation or stationary sources referenced in Section 36.404 of the County of San Diego County Code. Noise related to HVAC operation noise that exceeds these standards at off-Reservation receivers would be considered a significant permanent noise impact.

As referenced above, the FTA vibration guidelines are used herein to describe potential impacts associate with vibration. A vibration level of 72 vibration velocity level in decibels (VdB) is used for residences and buildings where people normally sleep (i.e., hotels) to determine whether project-related vibration would adversely affect people. The vibration threshold used for the proposed project is 72 VdB as residences are the only off-Reservation receptors that would be affected by the project.

Vibration levels that would exceed 72 VdB would cause a potentially significant permanent impact to off-Reservation receivers. With respect to ground-borne vibration impacts on structures, the FTA states that ground-borne vibration levels in excess of 100 VdB would damage fragile buildings and levels in excess of 95 VdB would damage extremely fragile historic buildings. No historic buildings are known to occur in the immediate vicinity off-Reservation. Thus, 100 VdB is used to conservatively quantify potential vibration impacts to neighboring structures. Vibration levels that would exceed 100 VdB may have a temporary significant vibration impact to structures. Because operation of the proposed project would not create vibration, only construction-related vibration impacts are evaluated.

4.4.3 Analysis of Project Effects and Determination of Significant Impact

A. Construction Noise Impacts

The primary noise sources during construction activities would include heavy machinery used in demolition, grading and clearing the site, as well as equipment used during building construction and paving. Table 4.4-2 provides typical

noise levels associated with operation of mobile and stationary construction equipment. As shown, average noise levels associated with the use of heavy equipment can range from 81 to 95 dBA at 25 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction.

Table 4.4-2
Typical Construction Equipment Noise Levels

Equipment Onsite	Typical Level (dBA) 25 Feet from the Source	Typical Level (dBA) 50 Feet from the Source	Typical Level (dBA) 100 Feet from the Source
Air Compressor	84	78	71
Backhoe	84	78	71
Bobcat Tractor	84	78	71
Concrete Mixer	85	79	73
Bulldozer	88	82	76
Jack Hammer	95	89	83
Pavement Roller	86	80	74
Street Sweeper	88	82	76
Man Lift	81	75	69
Dump Truck	82	76	70

Source: Birdseye Planning Group, 2016b.
Noise levels based on actual maximum measured noise levels at 50 feet (Lmax).
Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance.

R2 referenced above is the closest off-Reservation receptor with line of sight views to the construction area. It is located approximately 1,400 feet to the northwest. Tables 4.4-2 and 4.4-3 show typical maximum construction noise levels at various distances from construction activity, based on a standard noise attenuation rate of 6 dBA per doubling of distance. The noise level used to estimate the maximum sustained noise level that could occur (Table 4.4-3) is based on use of a bulldozer as the mobile source reference sound level.

The maximum noise levels during equipment operation would attenuate from 88 dBA at the source to 63 dBA at 500 feet and 57 dBA at 1,000 feet. Therefore, mobile construction equipment noise would not exceed 75 dBA at the property line of R2. Actual construction noise levels will fluctuate throughout the day depending on the type and location of equipment used and whether multiple pieces of equipment are operating simultaneously in the same area.

Therefore, temporary construction noise levels are less than significant and would not expose off-Reservation receiving properties to a significant temporary noise increase (Significance Criterion a and d).

Temporary Construction-Related Vibration

Based on the information presented in Table 4.4-4, vibration levels associated with a large bulldozer could range from 87 VdB at 25 feet from the source to 75 VdB, 100 feet from the site.

Table 4.4-3
Typical Maximum Construction Noise Levels at Various Distances from Project Construction

Distance from Construction	Maximum Noise Level at Receptor (dBA)
25 feet	88
50 feet	82
100 feet	76
250 feet	70
500 feet	63
1,000 feet	57

Source: Birdseye Planning Group 2016b.

Table 4.4-4
Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	87	81	79	77	75
Loaded Trucks	86	80	78	76	74
Jackhammer	79	73	71	69	67
Small Bulldozer	58	52	50	48	46

Source: Birdseye Planning Group 2016b.

The threshold where minor damage can occur in fragile buildings is 100 VdB. Vibration levels are projected to be under this threshold at 100 feet and would further attenuate as the distance between the source and receivers increases. Thus, structural damage is not expected to occur as a result of construction activities associated with the proposed project. The nearest single-family residences are located approximately 1,400 feet northwest of the construction area. Vibration levels would be approximately 75 VdB at 100 feet and attenuate to 69 VdB, approximately 200 feet from the source and further attenuate as the distance from the source increases. Thus, vibration levels at the nearest residence would be below the 72 VdB threshold for residences and/or buildings where people sleep. Temporary construction vibration impacts would not expose off-Reservation receiving properties to a significant temporary vibration increase (Significance Criterion b).

Therefore, no temporary construction noise or vibration impacts (Significance Criterion a, b, and d) are anticipated with the implementation of the proposed Project at any off-Reservation sensitive receptors and no further analysis is required.

B. Operational Noise Impacts

Traffic Noise. Traffic is the primary noise source associated with the proposed Project post-construction. The proposed Project would contribute to increased traffic volumes on Willows Road both east and west of the Casino/Resort. The majority of new visitor trips were analyzed as entering the site from west; however, employee trips from the east are also expected to contribute to an increase in volumes. The increased traffic volumes may cause or contribute to an increase in traffic-related noise on and adjacent to the project site.

Noise levels along Willows Road from just west of Viejas Grade Road to the west and the off-Reservation residences (south of the parking areas located southeast of the casino/resort and east of the Viejas Outlet Center) to the east were estimated using the Traffic Noise Model (TNM) Version 2.5.

TNM was calibrated to within 2 dBA of the noise measurements taken in the field (see Table 4.4-1) using traffic volumes counted during noise monitoring. Roadway noise levels were estimated for a weekday peak hour. Average daily trips (ADT) were obtained from traffic data provided by Linscott, Law and Greenspan (2016). Of the total ADTs, 10% were assumed to occur during the peak hour for noise modeling purposes. The traffic signal located in the study area was included in the modeling calculations to account for speeds approaching and departing the intersection.

Table 4.4-5 shows the existing and anticipated future (cumulative) traffic noise levels at the two off-Reservation receptors on Willows Road (R1 and R3) shown in Figure 4.4-1. Existing modeled roadway noise levels are approximately 61.6 at R1 and 69.6 at R3. Because existing noise levels exceed 50 dBA, a project-related noise impact would occur if the project increased noise levels by 10 dBA or more. As shown in Table 4.4-5, project related traffic volumes would not cause a perceptible increase in noise levels within the study area. At most, traffic noise levels would increase by 0.4 dBA at R3, which would experience the largest traffic volumes. The increase is less than the 3 dBA increase needed to cause a perceptible increase and the 10 dBA needed to cause a significant impact. Therefore, the project's impact with respect to traffic noise would be less than significant. Further, the project would not expose off-Reservation persons to a substantial permanent increase in noise (Significance Criterion a and c).

Heating, Ventilation and Cooling Equipment

This section examines the potential stationary noise source impacts associated with the operation HVAC units installed on the roof top of the proposed buildings. To predict the worst-case future noise environment, continuous reference noise levels were used to provide a representation of potential impacts associated with operation of the compressor and mechanical ventilation systems. While it is understood the units would cycle on and off over a 24-hour day, this approach assumes continuous operation; and thus, represents the worst-case condition. To assess the mechanical equipment noise impacts at the nearest receptors located off-Reservation, the worst-case nighttime standard of 45 dBA was utilized.

Table 4.4-5
Existing and Project Related Noise Levels

Roadway	Existing	Existing Plus Project	Project Change	Significant Impact
Receiver 1	61.6	61.7	0.1	No
Receiver 3	69.6	70.0	0.4	No

Estimates of noise generated by traffic from roadway centerline at the property line for each receiver.
Source: Birdseye Planning Group, 2016.

Sound from a small stationary source radiates uniformly outward from the source. As discussed, the sound level attenuates or drops-off at a rate of 6 dBA for each doubling of distance. The specific number of units that will be installed is unknown; however, the Viejas Hotel South Tower project assumed the installation of eleven 20 Ton condensers. To evaluate the HVAC impacts associated with the proposed project, the reference noise level (e.g. 84-85 dBA at a reference distance of 6 feet) for each unit was assumed to be consistent with those used in the Viejas Hotel South Tower Project Noise Assessment (Ldn Consulting, 2014b). Thus, 85 dBA at a distance of 6 feet was assumed for the purpose of estimating worst-case noise levels associated with the project's HVAC system.

The closest off-Reservation (R2) receptor is located to the northwest of the project site at a distance of approximately 1,400 feet. The HVAC units will be spread out over the entire rooftop with units ranging in distance from 1,400 feet to 1,800 feet from the property line. Assuming 11 units are installed, it is reasonable to expect a unit could be installed at 35-foot intervals along the roof-top.

The noise levels associated with the roof-top HVAC units will be partially attenuated by building parapets that will likely vary in height to shield roof top equipment and provide aesthetic benefits to the building exterior. However, because the height and location relative to the HVAC units is unknown, it is assumed for this analysis that no shielding will be provided by the parapets. It is assumed that a total of 11 units will be installed. Assuming each have a reference level of 85 dBA at 6 feet and that all are operating at one time, the total sound level generated by the units at 6 feet will be approximately 95 dBA. In reality, the units will be spread out and the sound level at any one location will not cumulatively reach that level. However, assuming a 6 dBA attenuation per doubling of distance, noise levels from the cumulative operation of the HVAC units will attenuate to the 45 dBA nighttime standard at approximately 800 feet from the source. The nearest off-Reservation residence is approximately 1,400 ft away. Therefore, the project's noise impact associated with stationary operational noise is less than significant. Further, the project would not expose off-Reservation persons to a substantial permanent noise increase (thresholds a and c).

Operational Vibration

As referenced, the operational activities associated with the proposed project would not generate vibration; thus, there would be no vibration impact. The project would not expose off-Reservation persons to excessive groundborne vibration or groundborne noise levels (Significance Criterion b).

Therefore, no permanent noise or vibration impacts (Significance Criterion a, b, or c) are anticipated with the proposed Project at any off-Reservation sensitive receptor.

4.4.4 Cumulative Impact Analysis

Traffic noise impacts are measured at R1 and R3 and as discussed, projected noise levels would not significantly increase from existing conditions. Noise associated with operation of the stationary HVAC units would attenuate to 45 dBA approximately 800 feet from the source. Thus, given the distance between the source and receivers, stationary noise would be inaudible over ambient noise at R1, R2 and R3. Cumulative mobile and stationary noise would be the same as that reported for traffic (mobile) noise in Table 4.4-5.

4.4.5 Conclusions

Based on the noise analysis, no significant noise impacts are anticipated off-Reservation during either the construction or operational phases of the proposed Project. The proposed Project would not result in the exposure of off-reservation persons to noise levels in excess of standards established in the County noise ordinance, or U.S. EPA acceptability standards.

Based on the empirical data and the distances to the property lines the unshielded cumulative operational noise levels from the proposed HVAC units and traffic were found to be below the most restrictive nighttime property line standard of 45 dBA at the adjacent off-Reservation residential properties. In addition, the proposed Project would not create a direct or cumulative impact of more than 3 dBA CNEL on any roadway segment.

The proposed Project would not result in exposure of off-reservation persons to excessive groundborne vibration or groundborne noise levels. The proposed Project would not result in a permanent or substantial temporary or periodic increase in ambient noise levels in the off-reservation vicinity of the proposed Project. Therefore, the proposed Project would not result in a significant, nor cumulatively significant, noise impact.

4.4.6 Mitigation Measures

With no significant construction, operational, or cumulative off-Reservation noise impacts identified for the proposed Project, no mitigation measures are required.

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4.5 Transportation/Traffic

Information contained in this section is summarized from the *Traffic Impact Analysis, Viejas Casino & Resort – Phase 3* prepared by Linscott, Law and Greenspan (2016) included as Appendix F of this TEIR.

4.5.1 Existing Conditions

4.5.1.1 Study Area

The proposed project is for the construction and operation of a third hotel, the demolition and reconstruction of a portion of the existing Casino and some interior renovations of the existing Casino. The primary access to the proposed third hotel is the Casino's all-way stop controlled existing northwest entry intersection, located west of the Casino on Willows Road.

The study area for this project encompasses areas of anticipated impact related to the proposed Project. The scope of the study area (bi-directional 25-peak hour project trips) was developed based on the guidelines outlined in the County of San Diego Guidelines for Determining Significance – Transportation and Traffic (County of San Diego, 2011b*)* manual, existing traffic volumes to the Viejas Casino, the proposed Project distribution, and a working knowledge of the local transportation system.

The intersections and segments included in the study area are listed below. These locations were chosen since they will carry the majority of project traffic.

Intersections

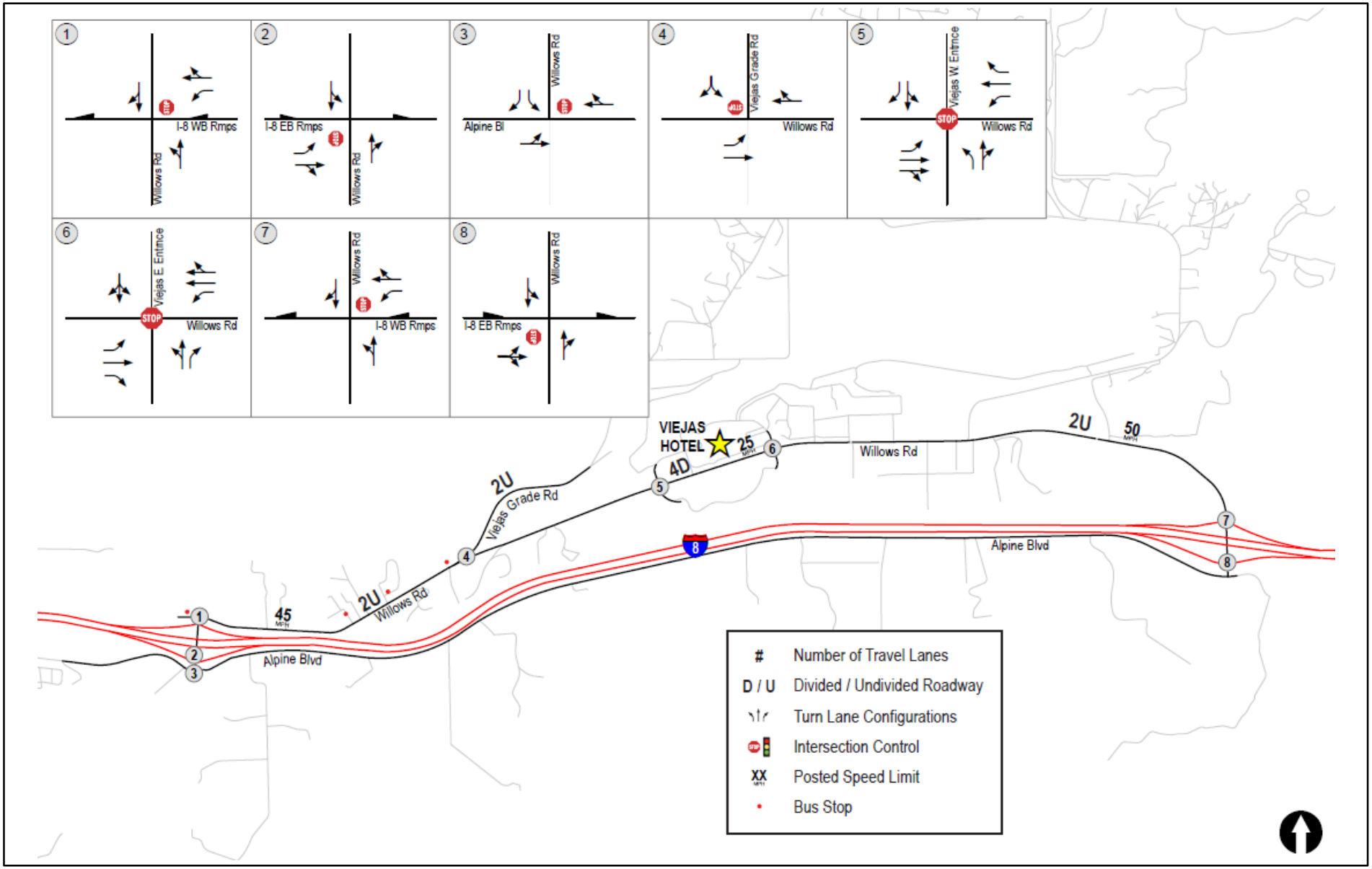
1. Willows Road (West) / I-8 Westbound ramps (Caltrans)
2. Willows Road (West) / I-8 Eastbound ramps (Caltrans)
3. Willows Road (West) / Alpine Boulevard (County)
4. Willows Road / Viejas Grade Road (County)
5. Willows Road / West Viejas Casino Entrance (County)
6. Willows Road / East Viejas Casino Entrance (County)
7. Willows Road (East) / I-8 Westbound ramps (Caltrans)
8. Willows Road (East) / I-8 Eastbound ramps (Caltrans)

Street Segments

1. Willows Road – West of Viejas Casino/ Hotel site (County)
2. Willows Road – East of Viejas Casino/ Hotel site (County)

4.5.1.2 Existing Transportation Conditions

The roadways in the vicinity of the site that may be affected by the proposed Project include I-8 and Willows Road. Figure 4.5-1 depicts the existing roadways and intersection configurations of the proposed Project area. The following provides a brief description of each of these roadways:



SOURCE: Linscott, Law and Greenspan, 2016

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Existing Conditions

FIGURE
4.5-1

- **Interstate 8 (I-8)** is an east/west facility that extends as a freeway from the San Diego area eastward to the California-Arizona border and beyond. It provides three lanes Eastbound and two lanes westbound lanes in the proposed Project area. The posted speed limit of Interstate 8 is 70 mph in the proposed Project area. Local interchanges are provided at Willows Road (west) and Willows Road (east).
- **Willows Road** is constructed as a two lane undivided roadway east and west of casino and as a four-lane roadway along the casino frontage. According to the County of San Diego General Plan (2011), Willows Road is classified as a Light Collector east and west of the casino, and as a Boulevard in the immediate vicinity of the casino. Passing is allowed on some portions of the roadway. The posted speed limit is 45 mph and 50 mph. Bus stops are provided on West Willows Road. Access to the proposed Project site is via the I-8 interchanges at West Willows Road and East Willows Road only. West Willows Road is identified as an LOS-exempt road in the County General Plan because a) further widening would have caused the community planning group to oppose the General Plan and b) further widening would be unnecessary in the event a proposed neighboring casino was constructed closer to the Viejas Casino because traffic for that casino would come from East Willows Road.

4.5.1.3 Existing Traffic Volumes

A Peak Hour Intersection Volumes

Manual intersection turning movement counts were conducted during the week (Thursday, February 25, 2016) and weekend (Saturday, February 27, 2016). These timeframes were selected as they represent highest traffic loads due to commuter and Casino traffic, respectively.

B Daily Segment Volumes

Bi-directional daily traffic counts were conducted on the street segments during the week (Thursday, February 25, 2016) and weekend (Saturday, February 27, 2016).

Table 4.5-1 is a summary of the traffic volumes or average daily trips (ADT). Figure 4.5-2 depicts the existing weekday and existing Saturday traffic volumes on a PM peak hour and daily basis.

Table 4.5-1
Existing Traffic Volumes

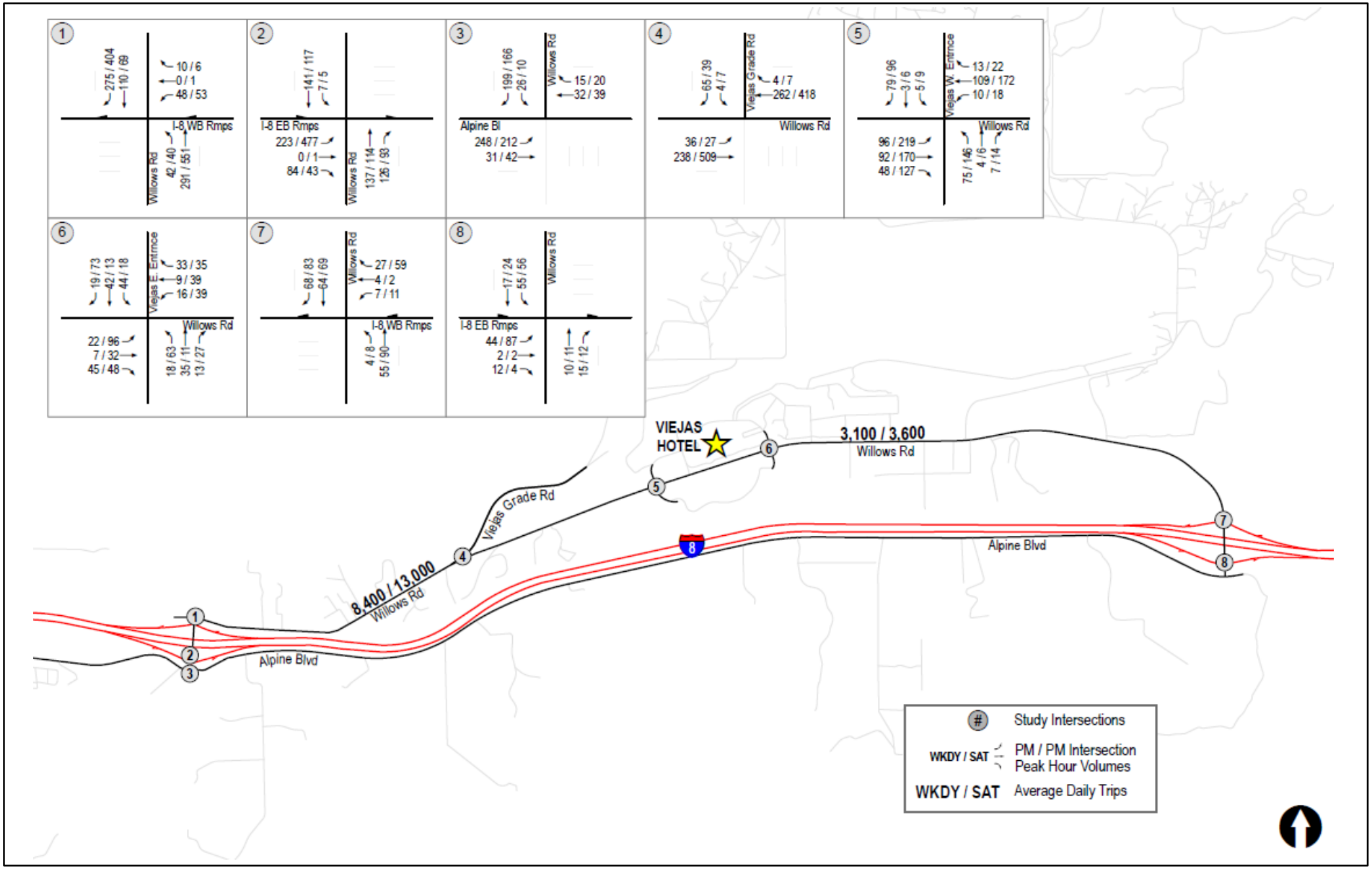
Street Segment	Weekday	Saturday
Willows Road		
West of Viejas Casino	8,400 ADT	13,000 ADT
East of Viejas Casino	3,100 ADT	3,600 ADT

Source: LLG, 2016

4.5.1.4 Existing Daily Traffic Operations

A. Daily Peak Hour Intersection Levels of Service

Table 4.5-2 summarizes the peak hour intersection operations for existing conditions in the study area. As shown, all the study area intersections are calculated to currently operate at acceptable service levels of LOS C or better on both a weekday and Saturday.



SOURCE: Linscott, Law and Greenspan, 2016

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Existing Traffic Volumes (Weekday/Saturday)

FIGURE 4.5-2

Table 4.5-2
Existing Intersection Operations

Intersection	Jurisdiction	Control Type	Peak Period	Delay [a]	LOS [b]
1. Willows Rd (W) / I-8 WB Ramps	Caltrans	MSSC [c]	WD PM	14.5	B
			WE Peak	21.5	C
2. Willows Rd (W) / I-8 EB Ramps	Caltrans	MSSC	WD PM	13.2	B
			WE Peak	24.0	C
3. Willows Rd (W) / Alpine Blvd	San Diego County	MSSC	WD PM	12.3	B
			WE Peak	11.5	B
4. Willows Rd / Viejas Grade Rd	San Diego County	MSSC	WD PM	10.6	B
			WE Peak	13.2	B
5. Willows Rd / W Viejas Casino Entrance	San Diego County	AWSC [d]	WD PM	9.1	A
			WE Peak	12.5	B
6. Willows Rd / E Viejas Casino Entrance	San Diego County	AWSC	WD PM	8.3	A
			WE Peak	9.0	A
7. Willows Rd (E) / I-8 WB Ramps	Caltrans	MSSC	WD PM	8.8	A
			WE Peak	9.1	A
8. Willows Rd (E) / I-8 EB Ramps	Caltrans	MSSC	WD PM	9.6	A
			WE Peak	10.1	B

Footnotes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. MSSC – Minor Street Stop Controlled intersection. Minor street left turn delay is reported.
d. AWSC – All-Way Stop Controlled intersection.

General Notes:
WD PM – Weekday PM peak hour
WE Peak – Weekend peak hour
Source: LLG, 2016

UNSIGNALIZED	
Delay	LOS
0.0 ≤ 10.0	A
10.1 to 15.0	B
15.1 to 25.0	C
25.1 to 35.0	D
35.1 to 50.0	E
≥ 50.1	F

B. Daily Segment Levels of Service

Table 4.5-3 summarizes the existing weekday and Saturday segment operations along the key study area roadways. As shown, Willows Road is calculated to currently operate at acceptable levels of service with the exception of Willows Road – West of Viejas Casino, which is calculated to currently operate at LOS E on Saturday.

Table 4.5-3
Existing Street Segment Operations

Street Segment	Period	Classification	Capacity (LOS E) [a]	ADT [b]	LOS [c]
Willows Road					
West of Viejas Casino	Weekday	2.2E Light Collector	16,200	8,400	D
	Weekend		16,200	**13,000**	**E**
East of Viejas Casino	Weekday	2.2E Light Collector	16,200	3,100	B
	Weekend		16,200	3,600	B

Footnotes:
a. Capacities based on *County of San Diego Roadway Classification Table*.
b. Average Daily Traffic Volumes.
c. Level of Service.
Source: LLG, 2016

4.5.1.5 Traffic Improvements

Viejas has worked with County of San Diego staff and the local community to implement several traffic related improvements in the last few years, which improve safety and reduce traffic loads on Willows Road. The following is a list of the improvements:

- Implemented double yellow striping on West Willows Road.
- Conducted a speed survey on West Willows Road which resulted in an increase in the use of radar detection and enforcement.
- Realigned the West Willows Road/Viejas Grade Road intersection and implemented lighting and guardrails.
- Relocated the bus turnout on West Willows Road.
- Install guardrails along a portion of East Willows Road.
- Require all bus and shuttles oriented to/from the Casino to the use East Willows Road.
- Require all Casino employees to use East Willows Road and implement disciplinary action to those who violate.
- Implemented traffic control procedures during special events that direct the majority of patrons to East Willows Road.

4.5.2 Guidelines for Determination of Significance

In accordance with Exhibit B of the 2014 Compact, a significant Transportation/Circulation impact would occur if implementation of the proposed Project would:

a. *Cause an increase in off-reservation traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections);*

b. *Exceed, either individually or cumulatively, a level of service standard established by the County Congestion Management Agency for designated off-reservation roads or highways;*

c. *Substantially increase hazards to an off-reservation design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or*

d. *Result in inadequate emergency access for off-Reservation responders.*

County policies have evolved with regard to LOS and traffic increases that are acceptable. For significance criteria a and b, in general, if project-only traffic impact causes the thresholds identified in Table 4.5-4 to be exceeded, the impacts are considered a potentially direct significant impact unless the impacts are to a LOS exempt roadway or cause only a marginal deficiency. If the proposed Project together with other cumulative projects causes the thresholds to be exceeded, the impact is a potentially cumulative significant impact unless the impacts are to a LOS-exempt roadway or cause only a marginal deficiency.

Evaluation of potential significant impacts for road segments and intersections are based on the County of San Diego Guidelines for Determining Significance—Transportation and Traffic, (County of San Diego, 2011b). The County of San Diego's General Plan Mobility Element discusses the County's Level of Service criteria under Goal M-2. It requires that development projects provide associated road improvements necessary to achieve a level of service of "D" or higher on

all Mobility Element roads except for those where a failing level of service has been accepted by the County. The County maintains a list of such roads. West Willows Road, west of Viejas Casino has been accepted at LOS F.

Regarding Criterion c, in order to identify if the proposed Project would contribute traffic to any specific hazardous off-reservation design features, collision data were obtained for a period of five years from 2010 through 2014. An analysis of the collision data is included in Appendix F. Criterion d was addressed in the Initial Study (Appendix A) and found to be less than significant.

TABLE 4.5-4
County of San Diego Significance Criteria
Project-Related Increases That Exceed the Level of Significance

Measures of Significant Project Impacts to Congestion on Circulation Element Road Segments Allowable Increases on Congested Road Segments			
Level of Service	**Two-Lane Road**	**Four-Lane Road**	**Six-Lane Road**
LOS E	200 ADT	400 ADT	600 ADT
LOS F	100 ADT	200 ADT	300 ADT

General Notes:
1. By adding proposed Project trips to all other trips from a list of projects, this same table must be used to determine if total cumulative impacts are significant. If cumulative impacts are found to be significant, each project that contributes additional trips must mitigate a share of the cumulative impacts.
2. The County may also determine impacts have occurred on roads even when a project's traffic or cumulative impacts do not trigger an unacceptable level of service, when such traffic uses a significant amount of remaining road capacity.
3. If the project exceeds this significance criterion, its impact is not significant if the impacts are to an LOS-exempt roadway or does not cause more than a marginal deficiency.

Measures of Significant Project Impacts to Congestion on Intersections Allowable Increases on Congested Intersections		
Level of Service	**Signalized**	**Unsignalized**
LOS E	Delay of 2 seconds or less	20 or less peak hour trips on a critical movement
LOS F	Either a Delay of 1 second, or 5 peak hour trips or less on a critical movement	5 or less peak hour trips on a critical movement

General Notes:
1. A critical movement is an intersection movement (right-turn, left-turn, through-movement) that experiences excessive queues, which typically operate at LOS F.
2. By adding proposed Project trips to all other trips from a list of projects, these same tables are used to determine if total cumulative impacts are significant. If cumulative impacts are found to be significant, each project is responsible for mitigating its share of the cumulative impact.
3. The County may also determine impacts have occurred on roads even when a project's traffic or cumulative impacts do not trigger an unacceptable level of service, when such traffic uses a significant amount of remaining road capacity.
4. For determining significance at signalized intersections with LOS F conditions, the analysis must evaluate both the delay ***and*** the number of trips on a critical movement, exceedance of either criteria result in a significant impact.
5. If the project exceeds this significance criterion, its impact is not significant if the impacts are to an LOS-exempt roadway or does not cause more than a marginal deficiency.

Source: LLG, 2016.

4.5.3 Analysis of Project Effects and Determination of Significant Impact

A. Project Access, Pedestrian Circulation, and Project Construction

Project Access

Access to the hotel is proposed via an existing all-way stop controlled intersection on Willows Road, west of the casino. Dedicated left-turn and right-turn lanes are currently provided on Willows Road, thereby increasing overall

intersection capacity. With the addition of project traffic, this driveway is expected to operate at LOS B or better, thus providing adequate access to the proposed hotel, requiring no modification.

Pedestrian Circulation

With an additional hotel on the Viejas property, pedestrian activity will likely increase between the outlet center on the south side and the casino/ hotel on the north. The existing traffic signal on Willows Road fronting the casino includes a pedestrian crosswalk and push buttons. This signalized intersection and the dedicated pedestrian crosswalk would adequately serve the pedestrian interaction between the various uses on-site. No pedestrian circulation issues are identified; therefore, no improvements are required.

Project Construction Review

Construction traffic relates to the traffic generated from construction vehicles, which consist primarily of heavy trucks, smaller construction trucks, and worker vehicles. Construction of the proposed Project is expected to begin in June 2017 and be completed by December 2018. The major activities include demolition, site work, construction of foundation, building structures and interior design. Demolition of a portion of an existing building will be done between June 2017 and October 2017. Construction of the hotel will begin after the demolition and removal of debris and end December 2018. The project proposes to remove debris associated with demolition and replacement in kind of approximately 20,000 sq ft of the existing Casino and will utilize 65,000 cubic yards of fill for the hotel. An additional 120 truck trips are anticipated to remove demolition debris from and bring fill to the proposed Project site. This would occur over two or more weeks meaning a maximum of twelve (12) trucks a day would be added to the street system. This amount is less than two trips per hour and the trucks would use East Willows Road. The duration of the construction traffic would be limited, as would the expected hours of construction.

The analysis below shows acceptable LOS D or better operations during the PM commuter peak hour at the key study area intersections for both weekday and Saturday. Additionally, the Viejas reservation is requiring that all construction employees and workers be required to use the east Willows Road interchange to off-load traffic from west Willows Road. The traffic volumes on Willows Road east of the Casino are low. Therefore, no construction impacts are anticipated. It should be noted that construction permits from the County will be required for any work that is done within the County right-of-way; however, no such work is anticipated at this time.

B. Project Trip Generation

Project trips consist of vehicular trips on the street system, which begin or end at the proposed Project site and are generated by the proposed development. The proposed Project traffic generation calculations were conducted using the trip generation rates in the Traffic Needs Assessment of Tribal Development Projects in the San Diego Region *(*County of San Diego, *2003).* The document indicates a trip rate of 3 trips per room for a hotel. The document does not specify different trip rates between weekday and weekend timeframes. Hence, 3 daily trips per room were assumed for both weekdays and weekends. Table 4.5-5 summarizes the proposed Project traffic generation.

Weekday Trip Generation

The total project is calculated to generate approximately 510 ADT on a weekday with 36 trips during the PM peak hour (14 inbound / 22 outbound).

Weekend Trip Generation

The total project is calculated to generate approximately 510 ADT on a weekend day with 44 trips during the PM peak hour (19 inbound / 25 outbound).

Table 4.5-5
Project Trip Generation

Land Use	Quantity	Weekday [a]							Weekend [b]						
		Daily Trip Ends (ADT)		PM Peak Hour					Daily Trip Ends (ADT)		Peak Hour				
				% of	In:Out	Volume					% of	In:Out	Volume		
		Rate	Vol.	ADT	Split	In	Out	Total	Rate	Vol.	ADT	Split	In	Out	Total
Hotel [a]	170 Rooms	3/Room	510	7%	40:60	14	22	36	3/Room	510	8.69%	43:57	19	25	44

Footnotes:

a. For hotel, weekday trip rates and peak hour % were obtained from the *Traffic Needs Assessment of Tribal Development Projects in the San Diego Region,* March 2003, published by the County of San Diego.

b. Saturday daily rates were assumed the same as for the weekday. Peak hour percent was obtained from the ITE *Trip Generation* Land Use 310 - Hotel.

Source: LLG, 2016.

C. Project Trip Distribution

Trip distribution is the process of determining traffic percentage splits on the regional and local roadway network from which traffic will access a project site. Trip distribution is dependent upon the land use characteristics of the proposed Project and upon the general location of other land uses to which project trips would originate or terminate.

Given that the hotel is proposed to be located adjacent to the existing Viejas Casino, existing traffic counts were used to deduce the traffic distribution percentages. It is important to note that employees working at the Viejas Indian Reservation are asked to use the East Willows Road interchange to reduce traffic on West Willows Road, as reflected in the existing traffic counts. To be conservative, this study assumed all project trips from the west use the I-8/ West Willows Road interchange.

Figure 4.5-3 shows the proposed Project trip distribution percentages. Figure 4.5-4 shows the weekday and Saturday project traffic volumes. Figure 4.5-5 shows Existing + Project traffic volumes on a weekday and Saturday.

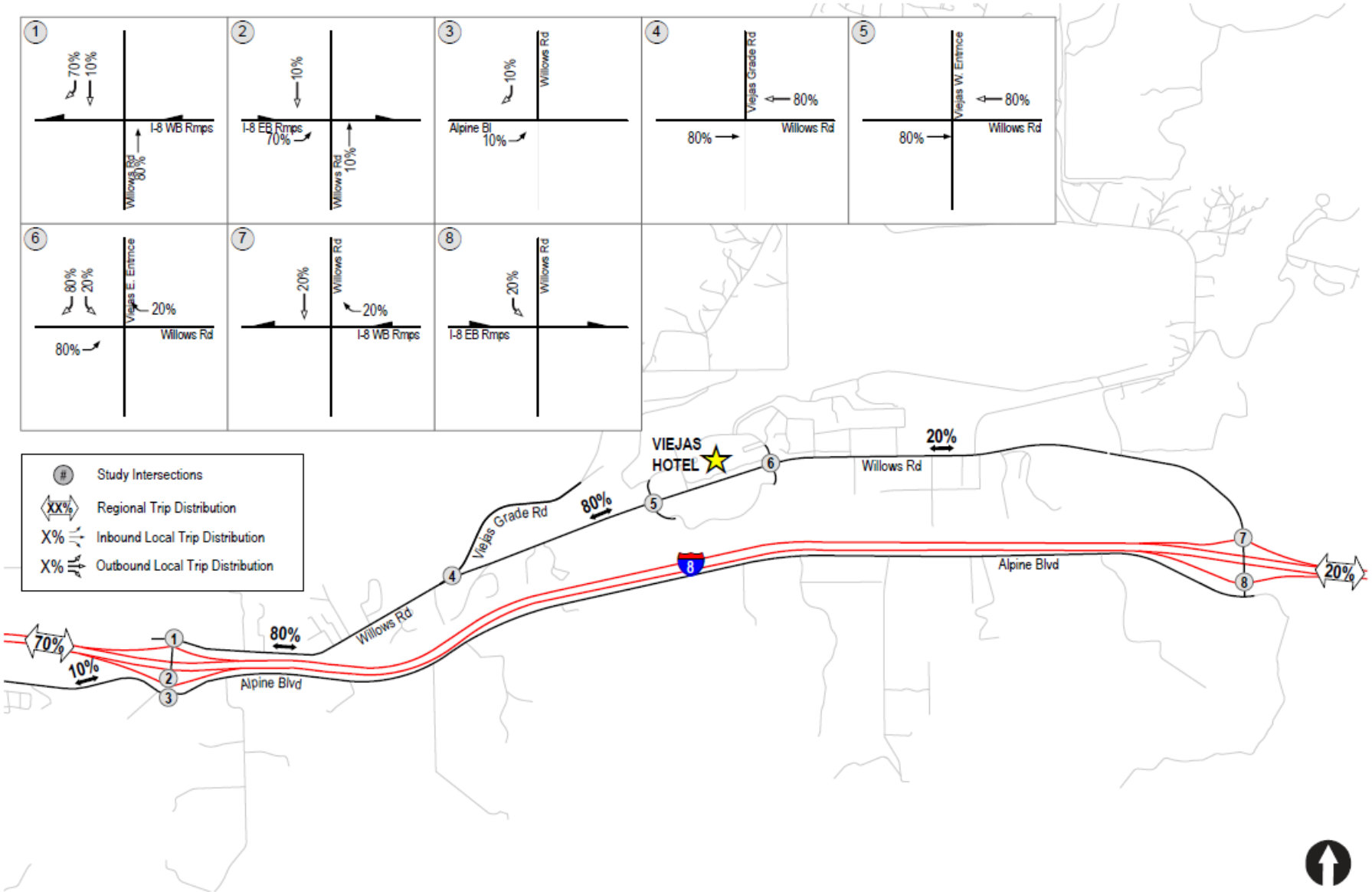
D. Existing + Project Near-Term Conditions

Intersection Near-Term Analysis

Table 4.5-6 summarizes the Weekday PM peak hour intersection operations for Existing + Project conditions. With the addition of the proposed Project traffic, all the study area intersections are calculated to continue to operate at acceptable LOS C or better.

Table 4.5-6 also summarizes the Weekend (Saturday) peak hour intersection operations for Existing + Project conditions. With the addition of the proposed Project traffic, all the study area intersections are calculated to continue to operate at acceptable LOS C or better.

Therefore, peak hour intersection operations for existing + project conditions on a weekday and Saturday would continue to operate at acceptable levels of service and would not result in a significant traffic impact.



SOURCE: Linscott, Law and Greenspan, 2016

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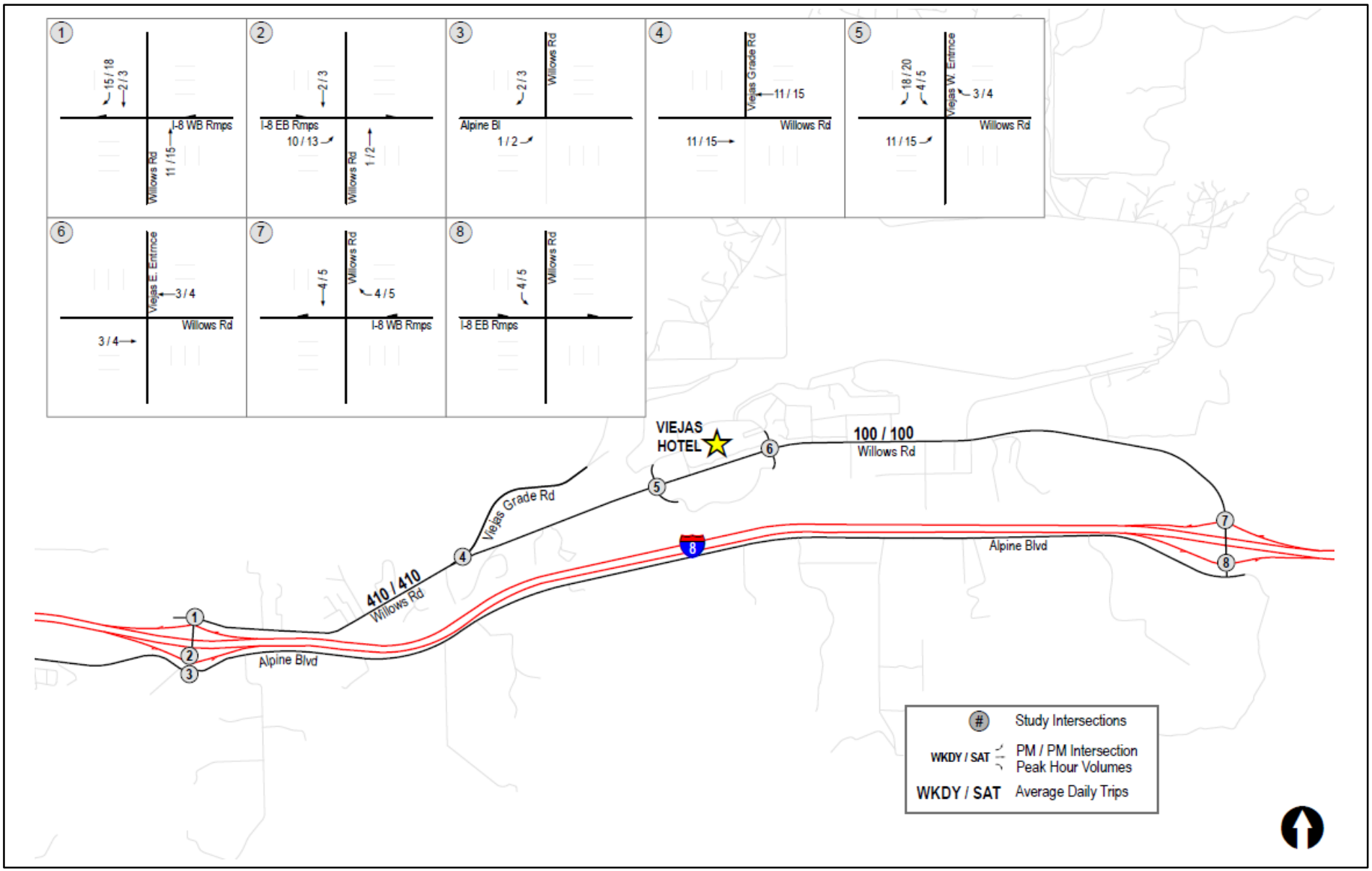
Project Traffic Distribution (Weekday/Saturday)

FIGURE 4.5-3



SOURCE: Linscott, Law and Greenspan, 2016

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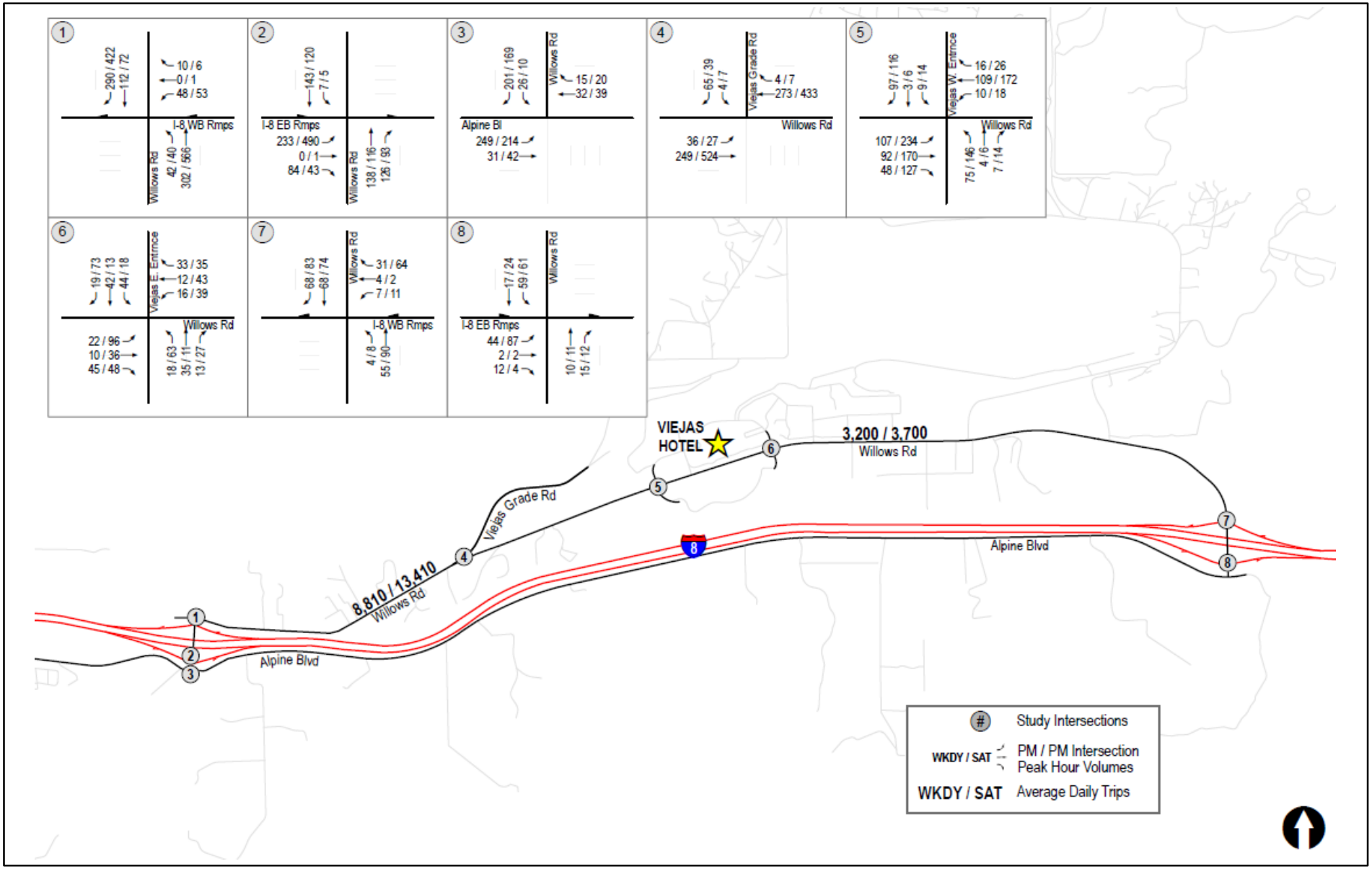
Project Traffic Volumes

FIGURE 4.5-4



SOURCE: Linscott, Law and Greenspan, 2016

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Existing + Project Traffic Volumes

FIGURE 4.5-5

Table 4.5-6
Near-Term Intersection Operations

Intersection	Control Type	Peak Hour	Existing		Existing + Project			Impact Type	Existing + Project + Cumulative Projects			Impact Type
			Delay [a]	LOS [b]	Delay	LOS	Δ [c]		Delay	LOS	Δ	
1. Willows Rd (West) / I-8 WB Ramps	MSSC[d]	WD PM	14.5	B	14.8	B	0.3	None	15.8	C	0.3	None
		WE Peak	21.5	C	22.5	C	1.0	None	24.6	C	1.0	None
2. Willows Rd (West) / I-8 EB Ramps	MSSC	WD PM	13.2	B	13.5	B	0.3	None	13.7	B	0.3	None
		WE Peak	24.0	C	26.1	D	2.1	None	28.4	D	2.1	None
3. Willows Rd (West) / Alpine Blvd	MSSC	WD PM	12.3	B	12.4	B	0	None	13.7	B	0	None
		WE Peak	11.5	B	11.5	B	0	None	12.8	B	0	None
4. Willows Rd / Viejas Grade Rd	MSSC	WD PM	10.6	B	10.7	B	0	None	10.8	B	0	None
		WE Peak	13.2	B	13.5	B	0	None	13.7	B	0	None
5. Willows Rd / W Viejas Casino Entrance	AWSC[e]	WD PM	9.1	A	9.4	A	0.3	Direct	9.5	A	0.3	None
		WE Peak	12.5	B	13.1	B	0.6	Direct	13.3	B	0.6	None
6. Willows Rd / E Viejas Casino Entrance	AWSC	WD PM	8.3	A	8.3	A	0.0	None	8.3	A	0.0	None
		WE Peak	9.0	A	9.0	A	0.0	Direct	9.1	A	0.0	None
7. Willows Rd (East) / I-8 WB Ramps	MSSC	WD PM	8.8	A	8.8	A	4	None	8.9	A	4	None
		WE Peak	9.1	A	9.2	A	5	None	9.2	A	5	None
8. Willows Rd (East) / I-8 EB Ramps	MSSC	WD PM	9.6	A	9.7	A	0	None	9.7	A	0	None
		WE Peak	10.1	B	10.2	B	0	None	10.3	B	0	None

Footnotes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Δ denotes an increase in trips for the critical movement due to the proposed Project in the County and increase in delay for intersection outside the County jurisdiction.
d. MSSC – Two-Way Stop Controlled intersection. Minor street left turn delay is reported.
e. AWSC – All-Way Stop Controlled intersection.

General Notes:
WD PM – Weekday PM peak hour
WE Peak – Weekend peak hour
Source: LLG, 2016.

Street Segment Near-Term Operations

Table 4.5-7 summarizes the weekday street segment operations. With the addition of proposed Project traffic, Willows Road is calculated to continue to operate at acceptable LOS D or better. Therefore, no significant traffic impact is anticipated for weekday segment operations.

Table 4.5-7 also summarizes the Saturday street segment operations. With the addition of proposed Project traffic, Willows Road, West of Viejas Casino is calculated to continue to operate at LOS E. The proposed Project adds 410

ADT on this segment. While this exceeds the threshold of 200 ADT on a 2-lane road at LOS E, there is no significant impact requiring mitigation on Willows Road – West of the casino for the following reasons:

1) According to the County of San Diego General Plan Update Alpine Mobility Element Network, the street segment operations on this portion of Willows Road have been accepted at LOS F and west Willows Road is therefore LOS-exempt; and,

2) It is only a marginal deficiency for the following reasons:

   a. The intersections adjacent to this segment (Willows Road/ I-8 WB ramps and Casino traffic signal) are calculated to operate at LOS D or better. Given the minimal side friction on Willows Road in this stretch, street segment operations may operate better than calculated;

   b. The proposed Project is a low generating ancillary use to the Casino adding 410 ADT and 35 peak hour trips on a weekend (Saturday) on this segment; and,

   c. The impact occurs only on a Saturday. During peak weekday commuter traffic, which is what the County typically analyzes, this segment is calculated to operate at LOS D or better.

Because of the reasons listed above, no mitigation measures are proposed for existing + project conditions on a weekday or Saturday for street segment operations and impacts are less than significant.

Table 4.5-7
Near-Term Street Segment Operations

Street Segment	Day of Week	Classi-fication	Existing Capacity (LOS E)[a]	Existing		Existing + Project			Impact Type	Existing + Project + Cumulative Projects			Impact Type
				ADT[b]	LOS[c]	ADT	LOS	Δ[d]		ADT	LOS	Δ	
Willow Road													
West of Viejas Casino	Weekday	2.2E Light Collector	16,200	8,400	D	8,810	D	410	None	8,960	D	410	None
	Saturday	2.2E Light Collector	16,200	13,000	E	13,410	E	410	None [e]	13,560	E	410	None [e]
East of Viejas Casino	Weekday	2.2E Light Collector	16,200	3,100	B	3,200	B	100	None	3,350	B	100	None
	Saturday	2.2E Light Collector	16,200	3,600	B	3,700	B	100	None	3,850	B	100	None

Footnotes:
a. Capacities based on the *County of San Diego Roadway Classification & LOS table.*
b. Average Daily Trips
c. Level of Service
d. Δ denotes a project-induced increase in the average daily traffic.
e. See *Section 4.6.3.D* for discussion.
Source: LLG, 2016.

E. Long-Term Scenarios Analysis

The following section discusses the street segment operations for the Long-Term scenario. Several sources were considered to obtain long-term volume projections for the study area roadways. Based on input from the County, the FCI GPA was determined to be the best source.

A Supplemental Environmental Impact Report (SEIR) was prepared for the proposed FCI GPA (County of San Diego, 2016). The proposed FCI GPA tiers from the current San Diego County General Plan and the General Plan Update Program (County of San Diego, 2011c). As part of the FCI GPA, various Community Plan and Subregional Plan Updates, Mobility Element Road Network Changes and San Diego County Zoning Ordinance Amendments were included in the traffic study in order to identify known issues and to ensure proper recommendations.

Table 4.5-8 shows that 47,736 ADT is forecast on Willows Road west of the casino and 46,656 ADT is forecast on Willows Road east of the casino. Table 4.5-8 also shows the segment LOS for three sets of roadway classifications for Willows Road: existing; County General Plan and FCI GPA.

The FCI GPA recommends that Willows Road east of the Casino be widened to 4 lanes. As shown in Table 4.6-8, Willows Road – East and West of Viejas Casino is anticipated to operate at LOS F with both the General Plan Update Mobility Element classification and the proposed FCI GPA classification.

The proposed Project would not be responsible for contributing to the future widening of Willows Road to Boulevard standards (east of the Casino as recommended in the FCI GPA) since the proposed Project does not cause a significant impact on Willows Road, the proposed Project is a commercial use within a portion of the Reservation designated for commercial uses, and the proposed Project is not part of the FCI GPA.

F Hazardous Design Features

5-year collision data were analyzed (see Appendix F) and it was determined that none of the collisions could be prevented by improvements to the conditions and all collisions were a result of driver error. No off-site hazardous design features were identified and it is therefore concluded that the project would not contribute any traffic to any off-site hazardous condition and significance criteria c is less than significant.

4.5.4 Cumulative Analysis

As indicated and detailed in Table 2-2 of this TEIR, nine (9) cumulative projects were identified in the proposed Project area. These projects are projected to generate 5,955 ADT with 603 total PM peak hour trips in the community of Alpine when constructed. The majority of the cumulative projects are distant from the subject project study area; therefore only a small amount of cumulative trips will be added to the study area.

In order to determine the weekend trip rates, trip rates for weekday and weekend were reviewed for the various types of land uses. It was determined that the weekend trip rates for the cumulative projects land uses are similar to or lower than that during the weekdays. However, high schools tend to have little to no traffic during the weekends and most Dental (health) offices have limited operations or are closed during the weekends. Thus, to be conservative, the same traffic as the weekday PM peak hour was assumed for the weekday peak hour.

Figure 4.5-6 shows the cumulative project traffic volumes. Figure 4.5-7 shows the Existing + Project + Cumulative projects traffic volumes on a weekday and Saturday.

Intersection Analysis

Table 4.5-6 summarizes the peak hour intersection operations for Existing + Project + Cumulative projects conditions on a weekday. With the addition of the cumulative projects traffic, all the study area intersections are calculated to continue to operate at acceptable LOS C or better.

Table 4.5-6 summarizes the peak hour intersection operations for Existing + Project + Cumulative projects conditions on a weekend (Saturday). With the addition of the cumulative projects traffic, all the study area intersections are calculated to operate at acceptable service levels of LOS D or better.

Therefore, peak hour intersection operations for Existing + Project + Cumulative projects conditions on a weekday and weekend (Saturday) would continue to operate at acceptable levels of service and would not result in a significant traffic impact.

Therefore, peak hour intersection operations for existing + project + cumulative project conditions on a weekday and Saturday would continue to operate at acceptable levels of service and would not result in a significant cumulative traffic impact.

Street Segment Operations

Table 4.5-7 summarizes the weekday street segment operations. With the addition of proposed Project and cumulative projects traffic, Willows Road is calculated to continue to operate at acceptable LOS D or better.

Table 4.5-7 summarizes the weekend (Saturday) street segment operations. With the addition of cumulative projects traffic, Willows Road, West of Viejas Casino is calculated to operate at LOS E. The proposed Project plus cumulative development traffic on this segment add 560 ADT. While this exceeds the threshold of 200 ADT on a 2-lane road at LOS E, there is no significant impact requiring mitigation on Willows Road – West of the casino as described previously.

Thus, no cumulative street segment impact would occur for weekday or Saturday street segment operations.

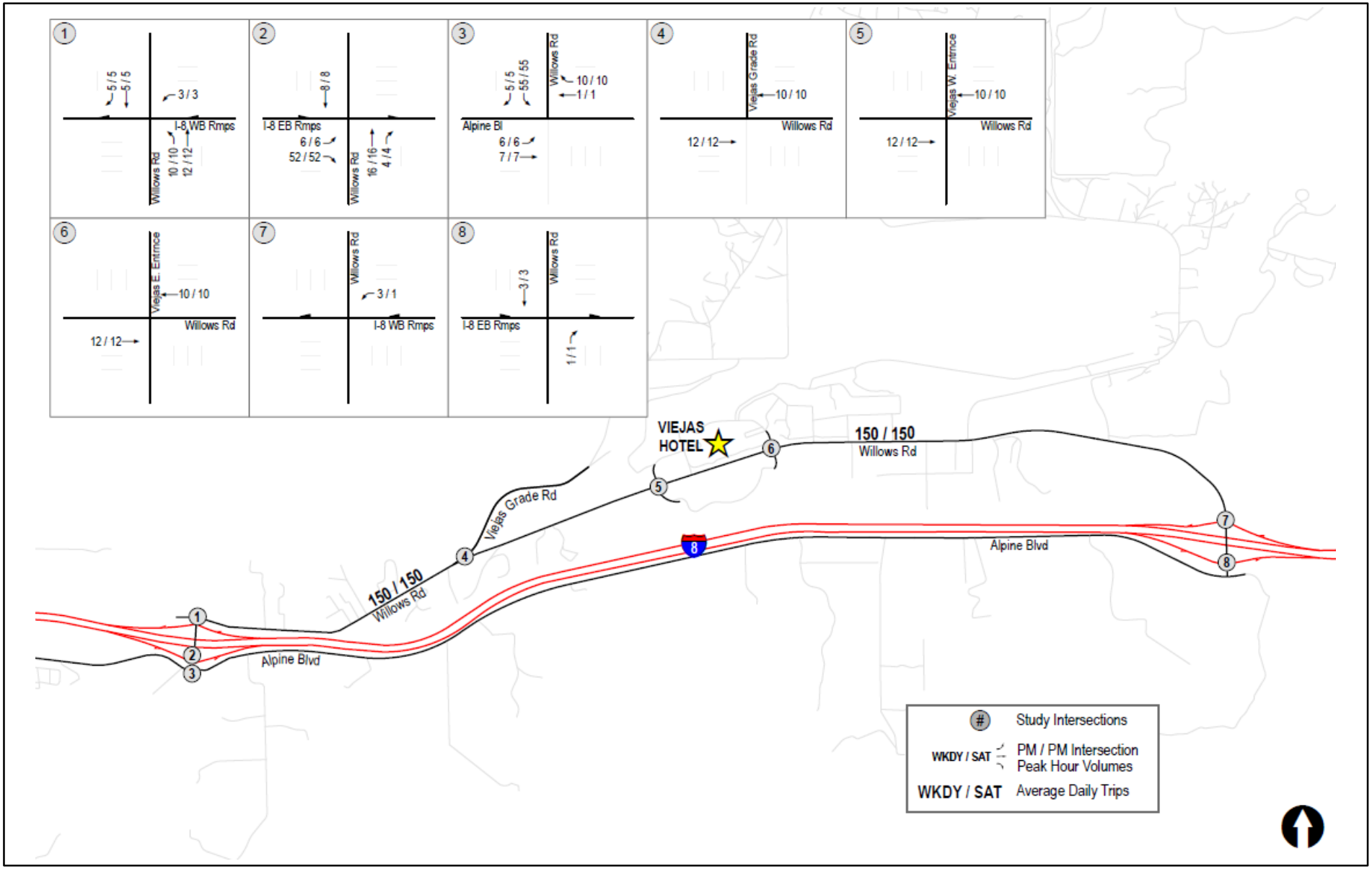
Table 4.5-8
Long-Term Street Segment Operations

Street Segment	Forecast ADT[a]	Existing			GPU EIR			FCI GPA		
		Roadway Class[b]	Capacity (LOS E)[b]	LOS[c]	Roadway Class	Capacity (LOS E)	LOS	Roadway Class	Capacity (LOS E)	LOS
Willow Road										
West of Viejas Casino	47,736	2.2E Lt Col	16,200	F	2.2E Lt Col	16,200	**F**	2.2E Lt Col	16,200	**F**
East of Viejas Casino	46,656	2.2E Lt Col	16,200	F	2.2E Lt Col	16,200	**F**	4.2B Blvd	28,000	**F**

Footnotes:
a. Source: FCI GPA SEIR
b. Capacities based on the *County of San Diego Roadway Classification & LOS table.*
c. Level of Service
Source: LLG, 2016

4.5.5 Conclusion

Significance criterion a and b: Significance criterion a and b are less than significant because based on the established significance criteria, no direct or cumulative intersection impacts were calculated and no significant direct or cumulative street segment impacts were calculated, on a weekday or Saturday.



SOURCE: Linscott, Law and Greenspan, 2016

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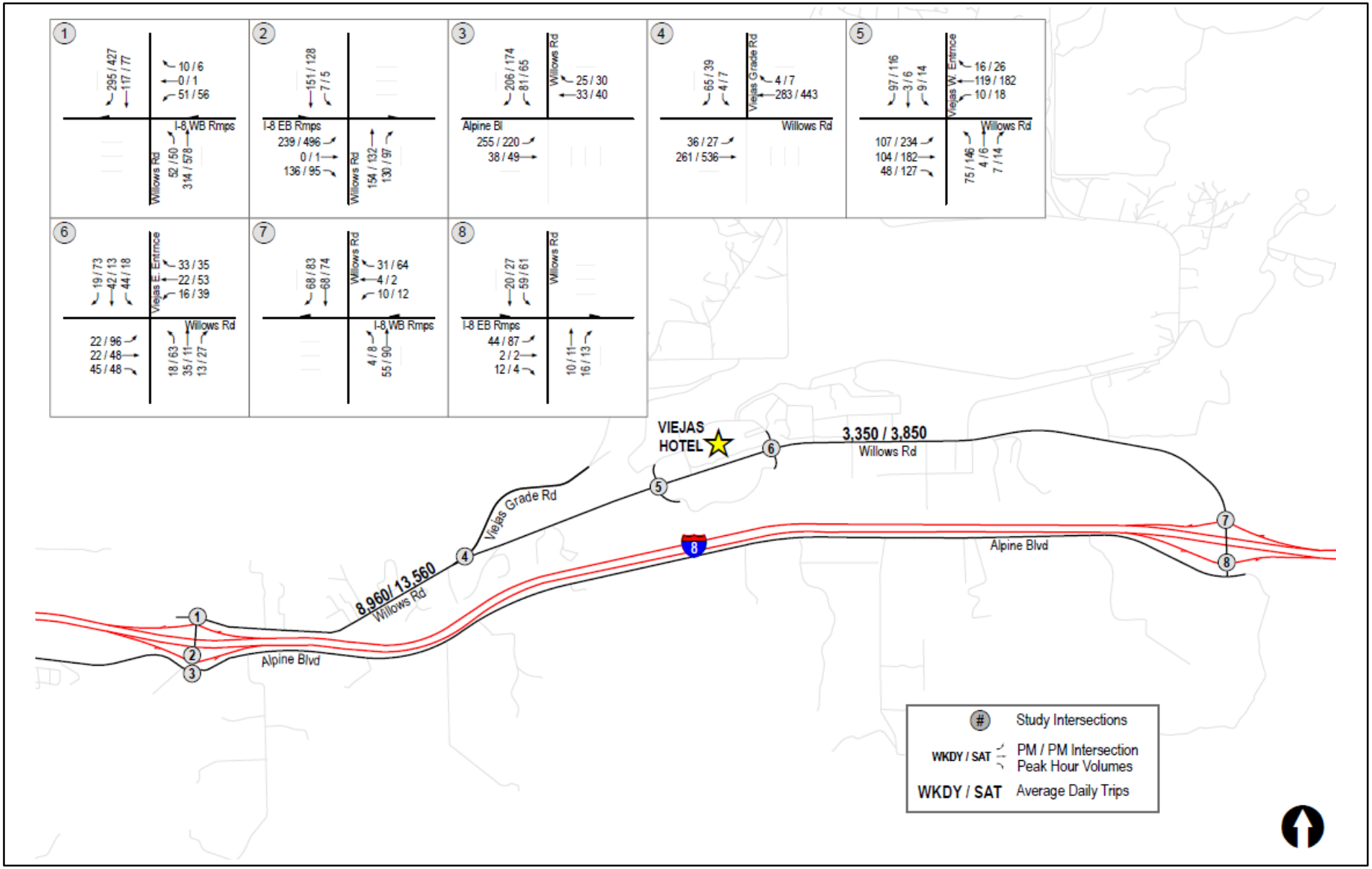
Cumulative Projects Traffic Volumes

FIGURE 4.5-6



SOURCE: Linscott, Law and Greenspan, 2016

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Viejas Casino & Resort - Phase 3

Existing + Project + Cumulative Projects Traffic Volumes

FIGURE 4.5-7

Significance criterion c: The Project would not substantially increase hazards due to an off-Reservation design feature or incompatible use because it was determined that none of the historical collisions analyzed could be prevented by improvements to the road conditions and all collisions were a result of driver error. No off-site hazardous design features were identified.

Significance criterion d: The project is not served by a dead-end road and therefore has adequate emergency access for off-Reservation responders. Criterion d is no impact.

4.5.6 Mitigation Measures

Traffic impacts are less than significant and no mitigation measures are required. However, the proposed Project will include the following traffic related improvements:

- A new bus terminal and bus drop off area will be constructed near the Casino's existing northwest entry.
- A new casino walk will provide access to the proposed hotel.
- The existing valet will be relocated to the new hotel porte cochère at the northwest entry.

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4.6 Energy Consumption

Viejas is bound to comply with the CBC pursuant to the 2014 Compact. That is, the structure would meet California Energy Code energy efficiency standards as described in Part 6 of the California Code of Regulations Title 24. Energy efficient lighting systems and equipment, and other performance and prescriptive compliance approaches for achieving energy efficiency will be implemented. In addition, the use of onsite groundwater for the project results in a substantial energy consumption saving as an offsite water supply does not have to be transported long distances to the site.

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4.7 Cumulative Impacts

Potential cumulative impacts associated with the proposed Project and other identified and studied projects known in the vicinity have been addressed under each of the environmental topics discussed in TEIR Sections 4.1 through 4.6. No cumulative impacts associated with the implementation of the proposed Project have been identified.

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5.0 GROWTH INDUCING IMPACTS

The proposed Project is entirely within the existing commercial development of the Viejas Casino & Resort. It does not require expanded off-Reservation infrastructure such as water or sewer lines. Existing on-Reservation water supply and water treatment facilities are adequate to meet the proposed Project's needs. No new roads or road improvements are proposed or required.

None of the County of San Diego examples of projects that may have growth-inducing characteristics, as found in the EIR Format and General Content Guidelines (County of San Diego, 2006) relate to the proposed Project. The proposed Project would not need utility or road infrastructure to be extended that could potentially induce nearby growth. Commercial growth off-Reservation may be an indirect outcome of the proposed Project to support visitors to the hotel or Casino & Resort but this type of growth would be anticipated by, and be in accordance with, the Alpine Community Plan. However, the proposed Project would not result in any economic stimulus, such as that provided by golf courses, shopping centers, industrial facilities or residential specific plans. Finally, the proposed Project does not involve a revision to local land use policies, such as General Plan amendments, annexations or rezoning.

Therefore, for the reasons discussed above the proposed Project will not have growth inducing impacts.

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6.0 SIGNIFICANT OFF-RESERVATION ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED OR WOULD BE IRREVERSIBLE IF THE PROPOSED PROJECT IS IMPLEMENTED

No significant off-Reservation environmental effects that cannot be avoided would occur as a result of the proposed Project. No significant off-Reservation environmental effects that would be irreversible would occur as a result of the proposed Project. Topics reviewed in detail to determine if they might result in a significant impact include those identified in the 2014 Compact Exhibit B. These topics are discussed in Chapters 3.0, 4.0 and 5.0 and Appendix A of this TEIR.

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7.0 ALTERNATIVES TO THE PROPOSED PROJECT

7.1 Rationale for Alternative Selection

The 2014 Compact Section 10.8.1(b) requires that a TEIR describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project and which would avoid or substantially lessen any of the significant effects on the environment, and evaluate comparative merits of the alternatives.

Pursuant to the terms of the 2014 Compact Section 10.8.1 (b), "…the Tribe need not address alternatives that would cause it to forgo its right to engage in Gaming Activities authorized by this Compact on its Indian lands…". The proposed Project's replaced/renovated Casino and associated amenities, including the hotel, are "Gaming Facilities" (as defined in 2014 Compact, Section 2.9) in which "Gaming Activities" (as defined in 2014 Compact, Section 2.5) occur. Therefore, the Tribe need not address alternatives such as, the No Project Alternative, No Casino Demolition/Replace and Renovate Alternative, nor the No Hotel Alternative because these alternatives would impair the Tribe's right to engage in the Gaming Activities authorized by the 2014 Compact.

7.2 Alternatives Considered

7.2.1 Hotel Located on Eastern Side or Outside of Reservation

A hotel located on the eastern side of the Reservation would have the potential to reduce trips on West Willows Road and thus minimize less than significant traffic impacts further; however, there is not adequate infrastructure such as sewer, water, electricity or natural gas service presently available to support the proposed hotel in this location. Providing these infrastructure needs would increase air quality impacts, in particular emissions of PM_{10} and NO_x and CO. The hotel in this location would not reduce visual impacts and would still be visible from I-8. In addition, the hotel site needs to be co-located with the Casino to meet the objective of the project "to provide convenient hotel space for Casino guests". Alternative hotel sites, either at the eastern side of the Reservation, or outside the Reservation, would not provide the desired proximity of hotel and Casino. For these reasons, eastern or off-Reservation hotel alternatives are not considered feasible alternatives.

7.2.2 Smaller Hotel

A smaller hotel may reduce visual impacts but visual impacts would not be avoided. A smaller hotel than proposed would marginally reduce construction-related PM_{10} and NO_x and CO emission impacts in the area, but would not fill the projected service demand. The northern and southern hotel towers operate at approximately 95 percent occupancy, demonstrating the need for a third hotel. Based on the demand, a 170-room third hotel is proposed. If a smaller third hotel is built and cannot meet demands, a potential guest would need to find alternative accommodations in the Alpine or San Diego metro area, thus resulting in additional vehicle traffic and greenhouse gas emissions. That is, a smaller hotel alternative would not meet the project objective to "encourage patrons to stay at the hotel rather than drive home resulting in an increase in public safety." Additionally, a smaller hotel would not support the project objective to "facilitate tribal economic development and contribute to the economic viability of the

Tribe." Therefore, this alternative is rejected because it does not demonstrate a substantial environmental advantage over the proposed Project and does not meet most of the basic project objectives.

8.0 COUNTY NEGOTIATIONS

To be provided in the Final TEIR after close of public review.

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9.0 LIST OF MITIGATION MEASURES

While proposed Project impacts have been determined to be less than significant and no mitigation measures are required, the following avoidance and minimization, design measures and/or Ordinance compliance measures will be adhered to:

9.1 Aesthetics

A-1 Hotel lighting would comply with the County's Light Pollution Code, Sec. 59.101 through 59.115.

9.2 Air Quality

Compliance with SDAPCD Rules 52 and 54 for site preparation and grading phases of construction to reduce fugitive dust.

AQ-1 Minimization of Disturbance. Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.

AQ-2 Soil Treatment. Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.

AQ-3 Soil Stabilization. Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

AQ-4 No Grading During High Winds. Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).

AQ-5 Street Sweeping. Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

9.3 Water Resources

Site design measures and/or source control Best Management Practices (BMPs) and/or treatment control BMPs will be implemented to ensure construction or operational pollutants do not enter stormwater runoff and impact water quality.

9.4 Traffic

The proposed Project will include the following traffic related improvements:

- A new bus terminal and bus drop off area will be constructed near the Casino's existing northwest entry
- A new casino walk will provide access to the proposed hotel.
- The existing valet will be relocated to the new hotel porte cochère at the northwest entry.

10.0 LIST OF TEIR PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

10.1 Viejas Enterprises

Robert Scannell, Director of Planning and Design

Tuari Bigknife, Attorney General at Office of the Attorney General

Eric Hans, Viejas Tribal Government, Director of Treasury

Samuel Brown, Viejas Government Officer, Treasurer

Chris Kelley, Chief Financial Officer

Donald Butz, Fire Chief

10.2 BRG Consulting, Inc.

Erich R. Lathers, President and Principal in Charge

Christina J. Willis, Vice President

Megan Hamilton, Project Manager and TEIR preparer

John Addenbrooke, Production Manager/Environmental Planner

Karl Lintvedt, GIS/Graphics Preparer/Environmental Planner

Subconsultants

Jay Jones, Geologist, Environmental Navigation Services, Inc.

John Boarman, Principal, Linscott, Law & Greenspan, Engineers

Narasimha Prasad, Transportation Engineer I, Linscott, Law & Greenspan, Engineers

Ryan Birdseye, Principal, Birdseye Planning Group

10.3 County of San Diego, Office of the Chief Administrative Officer

Eric Lardy, CAO Staff Officer

Vince Kattoula, CAO Staff Officer

Bob Spanbauer, Policy Advisor, Board of Supervisors, District 2

10.4 County of San Diego, Department of Planning and Development Services

Joseph Farace, Group Program Manager

Jim Bennett, Groundwater Geologist

10.5 County of San Diego, Department of Public Works

Jeff Kashak, Environmental Planner

Richard Chin, Associate Transportation Specialist

10.6 County of San Diego, County Counsel

Justin Crumley, Senior Deputy County Counsel

11.0 LIST OF REFERENCES

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Viejas Band of Kumeyaay Indians, 2005
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Viejas Casino & Resort – Phase 3 Project Admin Draft TEIR

Appendix A

Notice of Preparation (NOP)/Initial Study Checklist

Prepared by BRG Consulting, Inc.

May 26, 2016

NOTICE OF PREPARATION

To: State Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

From: Viejas Enterprises
5000 Willows Road
Alpine, CA 91903

To: County of San Diego
Clerk of the Board of Supervisors
1600 Pacific Highway, Room 402
San Diego, CA 92101

Subject: **Notice of Preparation of a Draft Tribal Environmental Impact Report**

The Viejas Band of Kumeyaay Indians is preparing a Draft Tribal Environmental Impact Report (TEIR) for the proposed project identified below. The TEIR is a requirement of the 2014 Amended and Restated Tribal-State Compact Between the State of California and the Viejas Band of Kumeyaay Indians (Compact) and will identify off-reservation, gaming-related, significant, environmental effects. We need to know your views as to the scope and content of the off-Reservation environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Interested persons are requested to identify the off-Reservation environmental issues and reasonable mitigation measures that the Tribe should explore in the Draft TEIR.

The project description, location and the potential environmental effects are contained in the attached Tribal Initial Study.

Due to the time limits mandated by the Compact, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice.

Please send your response to Mr. Bob Scannell at the address shown above. We will need the name of a contact person in your agency.

Project Title: Viejas Casino & Resort - Phase 3

Date: May 26, 2016

Signature _____
Chris Kelley

Title GM

Telephone (619) 659-2554

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Date: May 26, 2016

Signature _____
Chris Kelley

Title GM

Telephone (619) 659-2554

OFF-RESERVATION ENVIRONMENTAL IMPACT ANALYSIS

CHECKLIST AND DISCUSSION

1. Lead agency name and address:
   Viejas Band of Kumeyaay Indians
   Viejas Enterprises
   5000 Willows Road
   Alpine, CA 91901

2. a. Contact: Mr. Robert Scannell
   b. Phone number: (619) 659-1931

3. Project location:
   5000 Willows Road in the San Diego County Community of Alpine.
   Thomas Brothers Coordinates: Page 1234, Grid J/5
   Project name:
   Viejas Casino & Resort – Phase 3

4. Project sponsor's name and address:
   Viejas Enterprises
   5000 Willows Road
   Alpine, CA 91901

5. Tribal Plan Designation
   Land Use Designation: Commercial

6. Description of project (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation):

   Project Location
   The proposed project is located at 5000 Willows Road, Alpine to the west of the existing Casino, north of Willows Road and south of Viejas Creek (Figures 1, 2 and 3).

   Project Description
   The proposed project is for the construction and operation of a third hotel, the demolition and reconstruction of a portion of the existing Casino and some interior renovations of the existing Casino (Figure 4). There is no net change in gaming space as a result of construction, reconstruction or renovations.

The proposed five-story hotel will accommodate up to 170 all-suite rooms plus one basement level for back of house functions including service kitchens and offices. Amenities include a full service spa with private pool located at the main level of the hotel and an outside hotel pool with bar service.

A portion of the existing Casino will be demolished and reconstructed in place and a portion will be renovated. Amenities include three restaurant/bar venues. Figure 5 is a first floor site plan showing the location of amenities for the hotel and Casino.

A new bus terminal and bus drop off area will be constructed near the existing Casino's northwest entry and a new casino walk will provide access to the proposed hotel. The valet will be relocated to the new hotel porte cochère.

The total project building area is approximately 215,000 sq ft consisting of: 165,000 sq ft of hotel including a 9,000 sq ft spa; 20,000 sq ft of demolished and replaced in kind Casino; 20,000 sq ft of existing Casino renovation; 9,750 sq ft of restaurants/kitchen; and, a 1,900 sq ft bus depot. The total project landscaped area is approximately 200,000 sq ft.

All new construction work, renovation and landscaping will occur on existing developed land (existing parking lot and existing Casino) within an approximately 280,000 sq ft project footprint area.

Project Access
I-8 and Willows Road (with two interchanges to I-8) provide access to the site.

Surrounding land uses and setting (Briefly describe the project's surroundings):

The proposed project area is located west of the existing Casino, north of Willows Road and south of Viejas Creek. It is currently developed with an existing parking lot and existing Casino structure. Immediately surrounding the project area is development with commercial uses. The Viejas Outlet Center is located south of Willows Road. Interstate 8 (I-8) lies to the south of the Outlet Center, with residential areas of the community of Alpine south of I-8. Residential areas also are found along Willows Road both to the east and west of the Viejas Indian Reservation (Reservation).

Viejas Creek is a restored perennial stream that provides native riparian habitat. North of Viejas Creek is the Tribal residential area and land used for cattle grazing. Coast live oak trees are common throughout this area. Further beyond the Reservation to the north, east, and west is the Cleveland National Forest. There are residential in-holdings between the Reservation and the Cleveland National Forest.

7. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

There are no other public agencies with approval authority over the project.

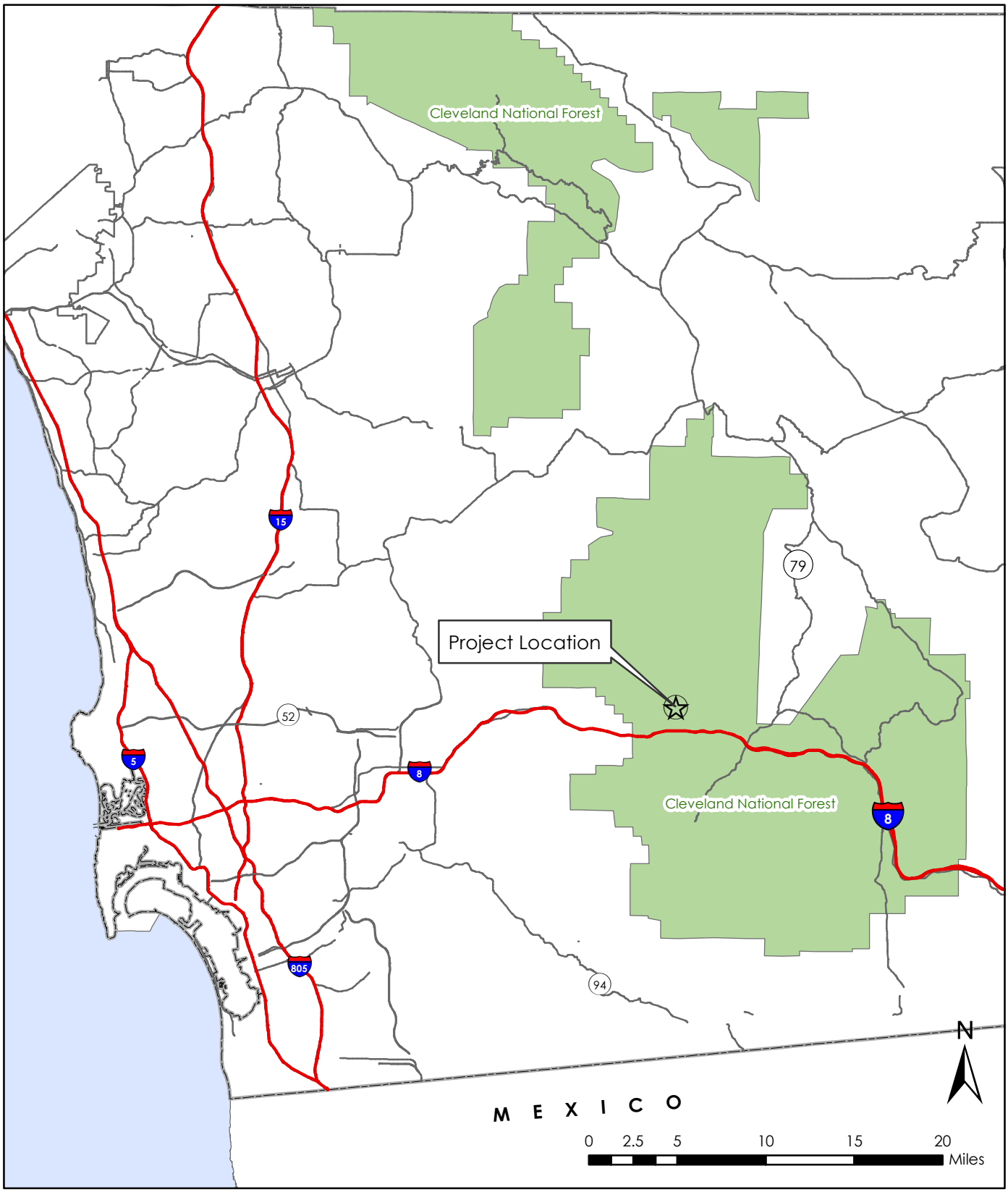
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist and on the following discussion pages.

■ Aesthetics	☐ Agriculture Resources	■ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology & Soils
☐ Hazards & Haz. Materials	■ Water Resources	☐ Land Use & Planning
☐ Mineral Resources	■ Noise	☐ Population & Housing
☐ Public Services	☐ Recreation	■ Transportation/Traffic
☐ Utilities & Service Systems	■ Cumulative Impacts	

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

■ In order to fulfill the Tribe's Class III Gaming Compact with the State of California, a TRIBAL ENVIRONMENTAL IMPACT REPORT is required.

Signature	Date 5/26/16
Printed Name Chris Kelley	Title GM



SOURCE: SanGIS, 2016

5/18/16

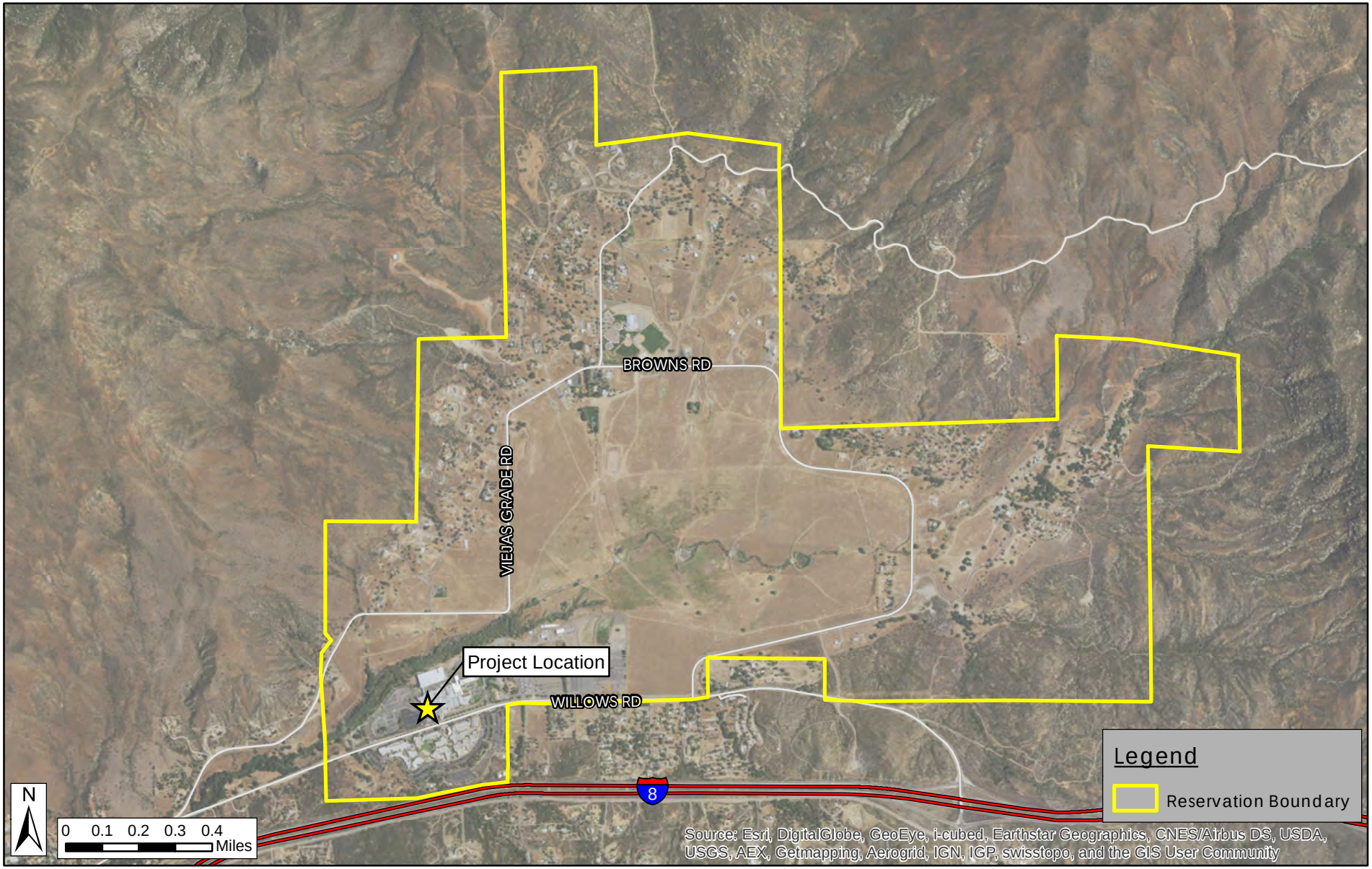
BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Regional Vicinity Map

FIGURE

1



SOURCE: Esri, 2016; SanGIS, 2016

5/18/16

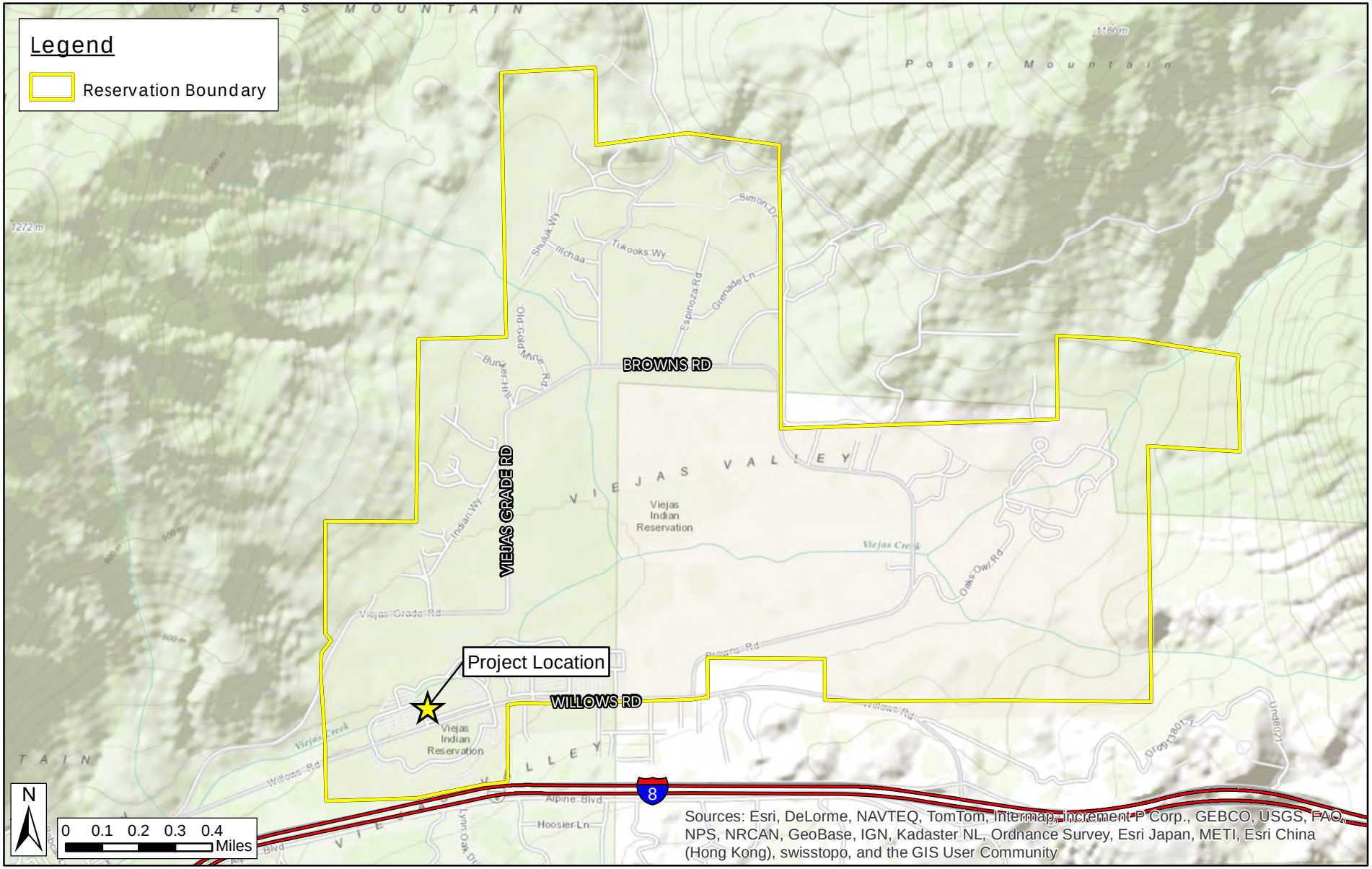
BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Project Location (Aerial)

FIGURE

2



SOURCE: Esri, 2016; SanGIS, 2016

5/18/16

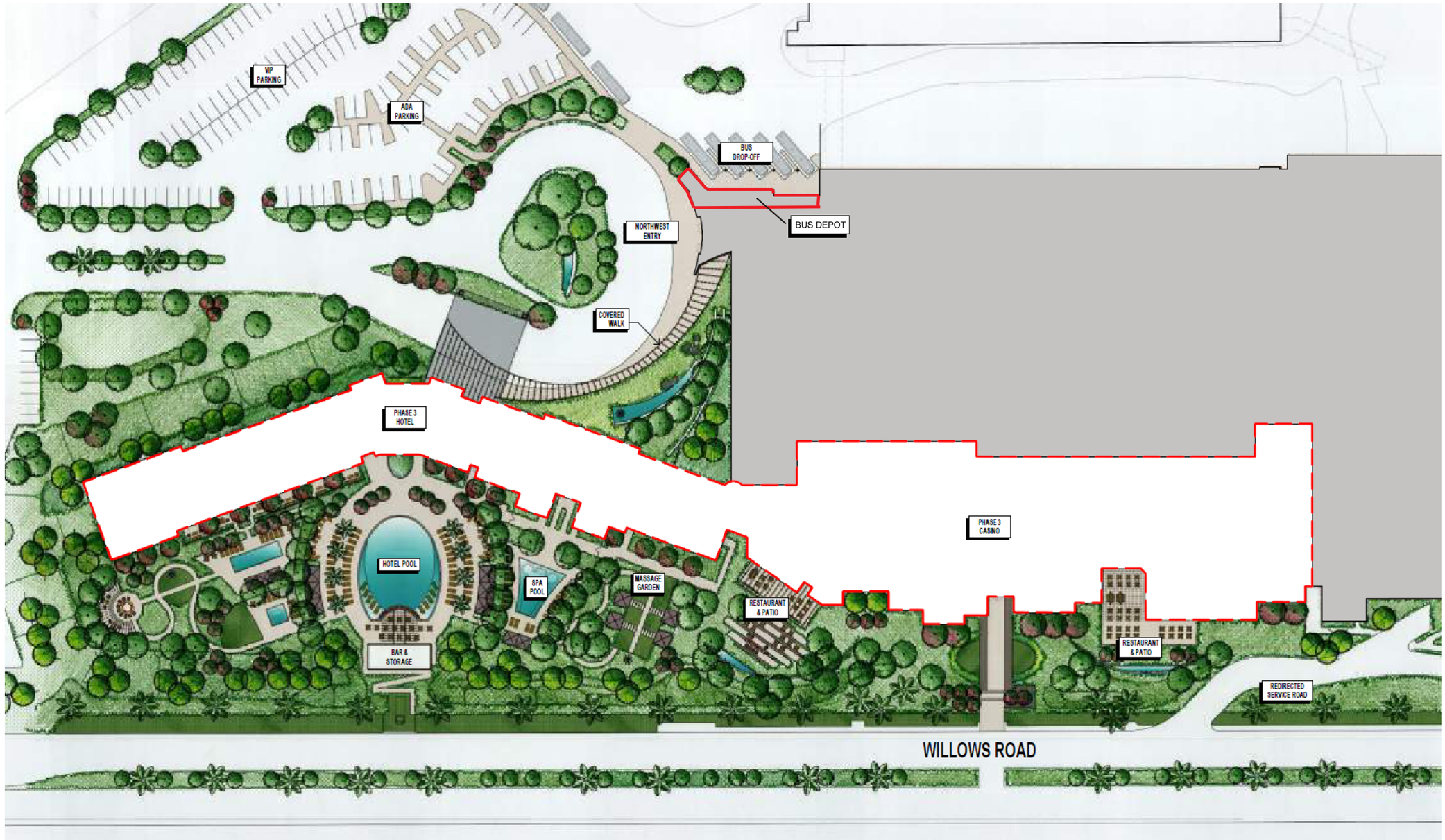
BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Project Location (Topographical)

FIGURE

3



SOURCE: Igroup Design, 2016

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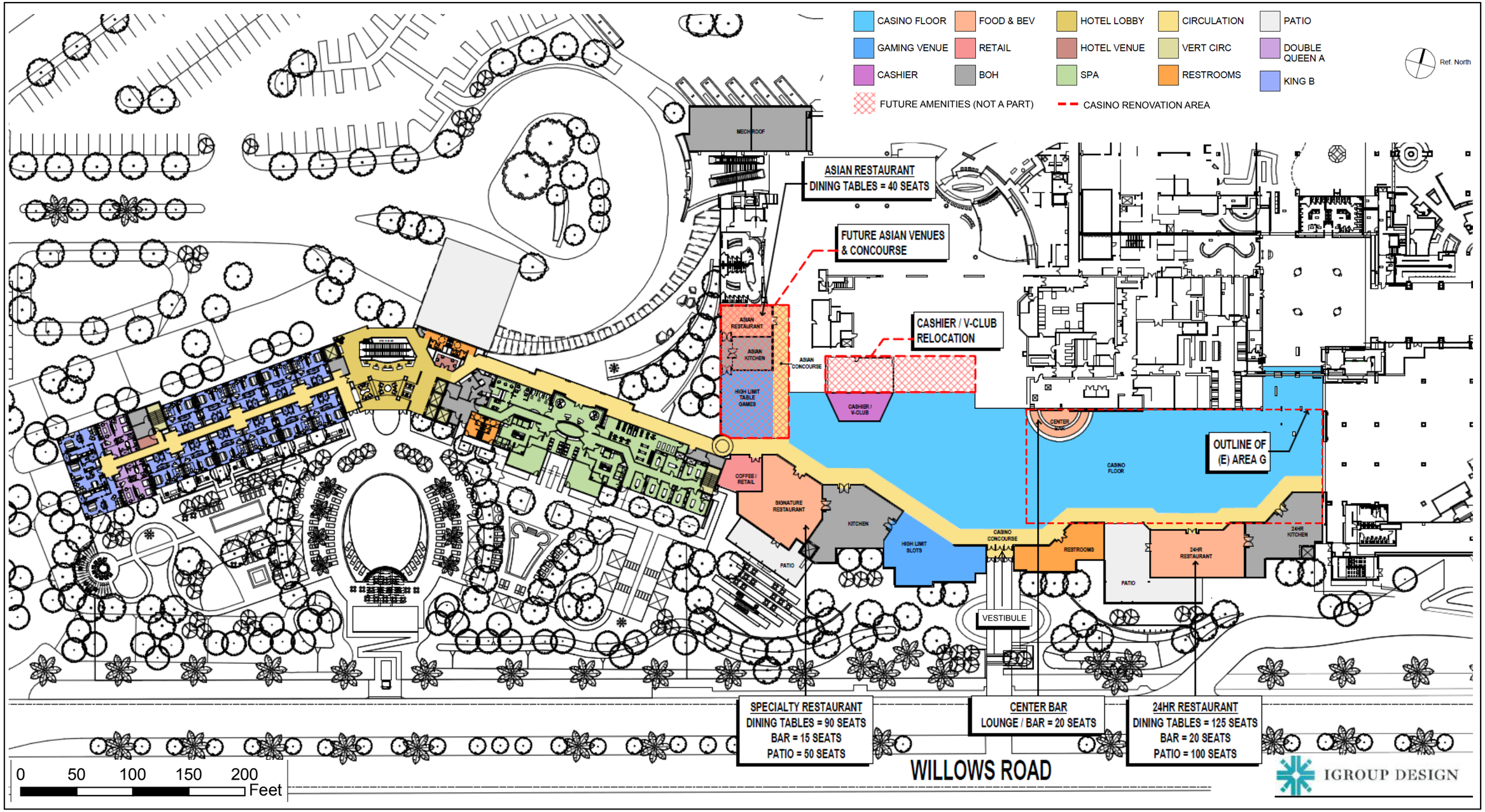
BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Conceptual Site Plan

FIGURE 4



SOURCE: Igroup Design, 2016

5/18/16

BRG CONSULTING, INC.

Viejas Casino & Resort - Phase 3

Overall Site Plan - 1st Level

FIGURE 5

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant.

4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- ■ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Scenic vistas are singular vantage points that offer unobstructed views of valued viewsheds, including areas designated as official scenic vistas along major highways or County designated visual resources. The proposed hotel would be five stories in height, and may be visible from Interstate-8 or a scenic vista. Therefore, it is possible that the proposed project could result in a substantial adverse effect on a designated scenic vista. Whether there are any such vistas off-Reservation in the vicinity of the project would be addressed during TEIR preparation.

b) Substantially damage off-Reservation scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ■ No Impact

Discussion/Explanation:

No Impact: State scenic highways refer to those highways that are officially designated. A scenic highway is officially designated as a State scenic highway when the local jurisdiction adopts a scenic corridor protection program, applies to the California Department of Transportation for scenic highway approval, and receives notification from Caltrans that the highway has been designated as an official Scenic Highway. There are no State Scenic Highways with views to the project area. Although nearby I-8 is eligible for scenic designation, the applicable local jurisdiction, the County of San Diego, has not adopted a scenic corridor protection program for it, and has not applied to Caltrans for designation. Therefore, the proposed project would not have any substantial adverse effect on a scenic resource within a State Scenic highway.

c) Create a new source of substantial light or glare, which would adversely affect day or nighttime views of historic buildings or views in the area?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ■ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes limited changes in outdoor lighting, and includes building materials consistent with the existing Casino. These materials are not highly reflective such as highly reflective glass or high-gloss surface colors. Therefore, it is not anticipated that the project would create new sources of light pollution that could contribute to skyglow, light trespass or glare that would adversely affect day or nighttime views in area.

The proposed project would not contribute to significant cumulative impacts on nighttime views because the proposed project would conform to the San Diego County Light Pollution Code. The project site is over 15 miles from the observatories at Palomar Mountain and Mount Laguna.

In addition, the proposed project's outdoor lighting is controlled by the Tribal Government, which limits outdoor lighting through strict controls. Therefore, conformance with the County Light Pollution Code, in combination with the Tribal outdoor lighting controls ensures that the project would not create a significant new source of substantial light or glare.

II. AGRICULTURE RESOURCES -- Would the project:

a) Involve changes in the existing environment, which, due to their location or nature, could result in conversion of off-Reservation farmland to non-agricultural use?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	■ No Impact

Discussion/Explanation:

No Impact: The proposed project site is located in the general vicinity of the southwest corner of the existing Viejas Casino and is currently a paved parking lot with an existing Casino structure. The proposed expansion would not trigger any additional development that may result in conversion of off-Reservation farmland, to non-agricultural use.

III. AIR QUALITY -- Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

■ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Operation of the project would not result in emissions of noticeable quantities of criteria pollutants listed in the California Ambient Air Quality Standards or toxic air contaminants as identified by the California Air Resources Board. Most of the anticipated guests of the proposed hotel would be persons who had already travelled to the Casino, Outlet Center, or existing hotel. During operations, new emission would be limited to those related to incrementally increased deliveries and additional client and employee trips. It is anticipated that new trips to the hotel would be minimal. This would be confirmed as part of the TEIR traffic study. Minor construction-related emissions would occur. Therefore, it is unlikely the project would conflict with or obstruct implementation of the Regional Air Quality Standards (RAQS) or the State Implementation Plan (SIP) on a project or cumulative level. This will be confirmed by the TEIR Air Analysis Study.

b) Violate any air quality standard or contribute to an existing or projected air quality violation?

■	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Potentially Significant Impact: Air quality impacts from operation of the proposed project would result from motor vehicle trips. However, motor vehicle trips are not expected to substantially increase because the hotel and renovations are for existing patrons. There could be short-term air quality impacts from construction activities. The Project proposes a new approximately 170-room, five-story hotel adjacent to the existing Casino and the demolition and reconstruction of a portion of the existing Casino. It is expected that emissions from the demolition and construction phase would be minimal and localized, resulting in pollutant emissions below the screening-level criteria established by SDAPCD Rule 20.2 and by the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook Sections 6.2 and 6.3. As such, the proposed project is not expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Anticipated operation and construction emissions would be addressed in the TEIR.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

■	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Potentially Significant Impact: San Diego County is presently in non-attainment for the 1-hour concentrations for Ozone (O_3) under the California Ambient Air Quality Standard (CAAQS). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter greater than 2.5 microns and less than 10 microns (PM_{10}) and less than or equal to 2.5 microns ($PM_{2.5}$). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

It is not likely that construction of the proposed hotel would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). However, potential air quality impacts may be cumulatively significant, and would be addressed in technical studies as part of the TEIR.

d) Expose off-Reservation sensitive receptors to substantial pollutant concentrations?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Sensitive receptors have not been identified within a quarter-mile (the radius determined by the SCAQMD in which the dilution of pollutants is typically significant) of the proposed project. Furthermore, no point-source emissions of air pollutants (other than mobile vehicle emissions) are associated with the project. The project would not expose sensitive populations to excessive levels of air pollutants.

e) Create objectionable odors affecting a substantial number of people off-Reservation?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: No potential sources of objectionable odors have been identified in association with the proposed project. As such, no impact from odors is anticipated.

IV. BIOLOGICAL RESOURCES -- Would the project:

a) Have a substantial adverse impact, either directly or through habitat modifications, on any species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

☐ Potentially Significant Impact	■ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed project site is developed as a parking lot and existing Casino building and does not support habitat. No species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service would be expected to occur on-site and therefore will not be adversely impacted either directly or through habitat modifications. Assessment of potential indirect noise impacts to species would be done outside the Reservation boundaries. It is not expected that there will be significant hotel construction noise impacts to off-Reservation biological resources because these impacts are temporary and noise impacts diminish with increasing distance, but the issue would be addressed in the noise technical report, and in the TEIR. No operational noise impacts to biological resources off the Reservation are expected from the hotel.

b) Have a substantial adverse effect on any off-Reservation riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	■ No Impact

Discussion/Explanation:

No Impact: The proposed project site is limited to developed Reservation property and is not immediately adjacent to any off-Reservation riparian habitats or other sensitive natural communities as defined by the County of San Diego Multiple Species Conservation Program, County of San Diego Resource Protection Ordinance, Natural Community Conservation Plan, Fish and Game Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations. Viejas Creek to

the north of the project site will not be affected by the proposed project. Therefore, the project will not impact riparian habitat or sensitive natural communities.

c) Have a substantial adverse effect on federally protected off-Reservation wetlands as defined by Section 404 of the Clean Water Act?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The proposed project site is limited to developed Reservation property and is not immediately adjacent to any off-Reservation wetlands as defined by Section 404 of the Clean Water Act. The portion of Viejas Creek within the Reservation closest to the project site is 200 feet to the northwest and the closest off-Reservation portion of Viejas Creek is located approximately 940 feet to the south, southwest of the project site. There would be no hydrologic interruption, diversion, or obstruction of Viejas Creek, either on or off-Reservation, as a result of the proposed project. Therefore, no impacts would occur to off-Reservation wetlands defined by Section 404 of the Clean Water Act.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The project site is an existing parking lot and Casino and does not contain native vegetation or habitats. Therefore, impedance of the movement of any native resident or migratory fish or wildlife species, or established native resident or migratory wildlife corridors, or impedance of the use of native wildlife nursery sites would not be expected as a result of the proposed project.

e) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The Tribe is not a party to any adopted Habitat Conservation Plan or Natural Communities Conservation Plan, nor is the Tribe subject to other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources. Lands that fall under such plans occur off-Reservation and would not be affected by the proposed project.

V. CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of an off-Reservation historical or archaeological resource?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The project would not impact any off-Reservation historical or archaeological resources, because there would be no ground or structure disturbance off-Reservation.

b) Directly or indirectly destroy a unique off-Reservation paleontological resource or site or unique off-Reservation geologic feature?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The project would not destroy either a unique off-Reservation paleontological resource or site or unique off-Reservation geologic feature, because there would be no ground disturbance off-Reservation.

c) Disturb any off-Reservation human remains, including those interred outside of formal cemeteries?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The project would not disturb any off-Reservation human remains, including those interred outside of formal cemeteries, because there would be no ground disturbance off-Reservation.

VI. GEOLOGY AND SOILS -- Would the project:

a) Expose off-Reservation people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California. Therefore, off-Reservation people or structures could not be exposed to any project-related effects from rupture of a known earthquake fault.

ii. Strong seismic ground shaking?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The 2014 Viejas State-Tribal Compact (Viejas Band of Kumeyaay Indians, 2014) Section 6.4.2(d) says "the Tribe shall adopt or has already adopted, and shall maintain throughout the term of this Compact, an ordinance that requires any Covered Gaming Facility Construction to meet or exceed the California Building Code and the Public Safety Code applicable to the county in which the Gaming Facility is located as set forth in Titles 19 and 24 of the California Code of Regulations, as those regulations may be amended during the term of this Compact, including but not limited to, codes for building, electrical, energy, mechanical, plumbing, fire, and safety." Viejas has adopted the Uniform Building Code (UBC) for Casino-related development in accordance with the provisions of the 2014 Viejas State-Tribal Compact. The UBC classifies all San Diego County with the highest seismic zone criteria, Zone 4. However, the proposed project is not located within 5 kilometers of the centerline of a known active-fault zone as defined within the Uniform Building Code's Maps of Known Active Fault Near-Source Zones in California. The project site is 17 miles southeast of the Elsinore Fault, the nearest known active fault. The proposed project would conform to the Seismic Requirements of the UBC. Therefore, there would be no impact at the project site from the exposure of people or structures to potential adverse effects from strong seismic ground shaking as a result of this project, and no potential off-Reservation impacts.

iii. Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
■ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: A geotechnical report (Nova, 2016) for the proposed project site concluded that there is a potential for seismic-related liquefaction such that maximum settlements on the order of 2.5 inches might be expected in a major seismic event where there is Unit 2 Alluvium (*Qal*). Differential settlement related to this movement will be about 1.3 inches over a distance of about 40 feet. The deep foundations of the hotel will not be susceptible because they will reach granite. However, the shallow foundation of the Casino rebuild will likely require reinforcement design measures such as nets, synthetic geogrids, polymer mashes, metal strips etc. to increase the bearing capacity of soils supporting shallow foundations. With the implementation of these design measures, potential liquefaction impacts on Reservation would be less than significant. There would be no seismic-related impacts to off-Reservation people or structures.

iv. Landslides?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The site is not located within a landslide susceptibility zone and thus there would be no off-Reservation landslide impact.

b) Result in substantial off-Reservation soil erosion or the loss of topsoil?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
■ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project will result in less impervious surface because an existing impervious parking lot will be replaced with a hotel with landscaping. Due to the increase in permeable surface (landscaping), potential off-Reservation stormwater drainage and velocities will be reduced. In addition, there are existing BMP's associated with the Viejas Casino & Resort complex that currently have the capacity to capture or slow stormwater runoff. Since drainage patterns will not substantially change and velocities will be reduced there is a less than significant potential for stormwater runoff to erode off-Reservation lands. In addition, there is no

off-Reservation ground disturbance. Therefore, the potential for substantial off-Reservation soil erosion or loss of topsoil is less than significant.

VII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

a) Create a significant hazard to the off-Reservation public or the off-Reservation environment through the routine transport, use, or disposal of hazardous materials?

☐ Potentially Significant Impact	■ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes a new hotel adjacent to the existing Casino and redevelopment of the existing Casino. Building construction and on-going activities needed to operate and maintain the Casino involve routine transport, use, and disposal of hazardous materials. These materials are typical of material used safely on a daily basis throughout the County and State of California in households and commercial uses. The proposed project would not result in a significant hazard to the off-Reservation public or off-Reservation environment because all transport, use, and disposal of hazardous substances would be in full compliance with the requirements of the 2014 Viejas State-Tribal Compact and with the State of California and federal regulations.

b) Create a significant hazard to the off-Reservation public or the off-Reservation environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ Potentially Significant Impact	■ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: See VII a), above. Materials transported, used and disposed of associated with the proposed project would be in such small quantities that any upset condition, such as a traffic accident involving a vehicle transporting such materials, would result in a minor spill requiring reporting and clean up in accordance with all applicable regulations. Such events have happened San Diego County and the State of California, with no significant effect. Impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed off-Reservation school?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The project is not located within one-quarter mile of any existing or proposed school. Therefore, the project would not have any effect on an existing or proposed school.

d) Expose off-Reservation people or structures to a significant risk of loss, injury or death involving wildland fires?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The proposed project is completely surrounded by developed areas, including the Casino, paved parking lots, irrigated landscape and streets. The Viejas Fire Department oversees wildland fire risk for the Casino and within the Reservation. Viejas also maintains cooperative agreements with other local fire fighting agencies. The Viejas Fire Department's current fleet of suppression vehicles consists of a type 1 engine, a type 3 engine and a type 2 truck that is cross-staffed by three firefighters. Viejas has a current agreement with the predecessor agency to the San Diego County Fire Authority and honors its commitments under that agreement. Viejas also has an agreement with the San Diego Rural Fire Department to jointly operate a water tender. The Viejas Fire Department operates an advance life support ambulance that is staffed with two firefighters. In addition, Viejas has Mutual-Aid arrangements with other service providers such as Alpine, Coronado and Lakeside. The Tribe has a close working relationship with the U.S. Forest Service through an interagency cooperative agreement. In conjunction with the Forest Service, Viejas has implemented a defensible space program as part of a Bureau of Indian Affairs approved fire management plan. Viejas' fire standards mirror those of the Forest Service and Viejas would provide adequate protection to all on the Reservation. There would be no off-Reservation people or structures exposed to a significant risk of loss, injury or death involving wildland fires.

VIII. WATER RESOURCES -- Would the project:

a) Violate any water quality standards or waste discharge requirements?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
■ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes a new hotel adjacent to the existing Casino and redevelopment of parts of the existing Casino. The existing Casino, hotel, commercial uses, residential and other uses on the Reservation rely on wastewater treatment at the Viejas Water Reclamation Plant. This facility is permitted and monitored by the State of California for compliance with Title 22 of the California Code of Regulations. Therefore, the project will not violate any waster discharge requirements.

The project would implement site design measures and/or source control Best Management Practices (BMP) and/or treatment control BMPs to reduce potential construction pollutants to the maximum extent practicable from entering storm water runoff that could leave the Reservation. The Viejas Casino & Resort complex is currently developed with BMP's that adequately minimize runoff and flow velocities. Because the project is increasing pervious surfaces by replacing a portion of the currently paved parking lot with landscaping, project runoff and flow velocities will not increase; therefore, no additional runoff or changes in the character of the existing runoff could violate water quality standards.

The project's construction BMPs, existing operational BMP's and sewer treatment plant would ensure that the project would not contribute to a cumulatively considerable impact to water quality or waste discharge requirements.

b) Substantially deplete off-Reservation groundwater supplies or interfere substantially with groundwater recharge such that there should be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

■ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The 2012 and 2014 TEIRs for Viejas Hotel Projects found adequate ground water supplies for both Reservation and off-Reservation uses, based on a 2001 Water and Wastewater Master Plan for Viejas Reservation, prepared by Brown & Caldwell and supplemental studies prepared by Environmental Navigation Services, Inc. (e.g., *Supporting Water Supply Evaluation, Viejas Hotel South Tower*, June 2014). These studies generally supported the findings of the 2001 report. The TEIR water supply analysis will rely on those prior documents and would consider the change in demand associated with the proposed development. Effluent from the hotel will be treated at a tertiary treatment plant operated by the Reservation and the resulting water will be used for irrigation of facility landscaping. Excess water not utilized by

landscaping would be available for groundwater recharge, thus minimizing facility impact on ground water levels.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation off-site.

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
■ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is currently developed as a parking lot and an existing Casino building. The proposed hotel, reconstructed Casino and landscaping would not substantially alter the existing topography, drainage patterns, nor stream or river drainage courses on-site or off-Reservation and therefore will not result in substantial erosion or siltation on- or off-site.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding off-site?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
■ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is currently developed as a parking lot and Casino. The proposed hotel, Casino reconstruction/renovations and landscaping would not substantially alter the existing topography, drainage patterns, nor stream or river drainage courses on-site or off-Reservation and therefore will not result in flooding offsite.

e) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff off-Reservation?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
■ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The project would not introduce any substantial new impervious surfaces since the project site is currently developed as a paved parking lot

and existing Casino building. The parking lot will be replaced with a hotel and landscaping, which is a net decrease in the amount of impervious surface. Construction BMPs would capture and limit runoff of any project construction-related pollutants.

There are existing BMP's associated with the Viejas Casino & Resort complex that currently have the capacity to capture or slow stormwater runoff and associated pollutants. Landscaping irrigation will be managed to prevent runoff. Stormwater drainage patterns will not substantially change and velocities will be reduced due to the decrease in impervious surfaces. Therefore, there is a less than significant potential for project related runoff to exceed capacity of off-Reservation drainage systems or for the construction or operation of the project to provide additional sources of polluted runoff.

f) Place within 100-year flood hazard area structures, which would impede or redirect off-Reservation flood flows?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: No 100-year flood hazard areas were identified or are expected to occur on the project site. The 100-year flood hazard area is totally contained within Viejas Creek, which is outside of the proposed project's footprint; therefore, no impact would occur.

g) Expose off-Reservation people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The project does not include any dam or levee or source of potential floodwaters. Therefore, the project would not expose people to a significant risk of loss, injury or death involving flooding.

IX. LAND USE AND PLANNING -- Would the project:

a) Conflict with any off-Reservation land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: As demonstrated elsewhere in the Initial Study Checklist, the project does not conflict with any land use plan, policy or regulation.

b) Conflict with any habitat conservation plan, or natural communities conservation plan covering off-Reservation lands?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	■ No Impact

Discussion/Explanation:

No Impact: The Tribe is not a party to any adopted Habitat Conservation Plan or Natural Communities Conservation Plan, nor is the Tribe subject to other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources. Lands that fall under such plans occur off-Reservation and would not be affected by the proposed project because the project is entirely within the Reservation and is occurring on currently developed land. There would be no impact.

X. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known off-Reservation mineral resource classified MRZ-2 by the State Geologist that would be of value to the region and the residents of the state?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	■ No Impact

Discussion/Explanation:

No Impact: The project would not affect any off-Reservation land. There would be no impact to mineral resources off the Reservation.

b) Result in the loss of availability of an off-Reservation locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	■ No Impact

Discussion/Explanation:

No Impact: The project would not affect any off-Reservation land. Thus, there would be no impact.

XI. NOISE -- Would the project result in:

a) Exposure of off-Reservation persons to noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- ■ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The project site is far enough away from existing off-Reservation uses that noise levels associated with construction or operation of the new hotel would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Noise Element
The County of San Diego General Plan, Noise Element, Policy 4b addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities where quiet is an important attribute. Residences are the only noise sensitive uses near the project area. Project implementation is not expected to expose existing or planned noise sensitive areas to project-related noise in excess of the CNEL 60 dB(A) because of the distance of the project site and existing parking lots to such off-Reservation uses. Therefore, it is expected that the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element. However, a noise study would be conducted as part of the TEIR in order to confirm that expectation.

Noise Ordinance – Section 36-404
Non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36-404) off the Reservation. The adjacent properties are zoned for low density residential, and have one-hour average sound limit of 45 to 50 dBA at the property line. The project's operational noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards because the project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line, and construction activities would be conducted in accordance with the County of San Diego's noise ordinance provisions. However, a noise study would be conducted as part of the TEIR in order to confirm that expectation.

Noise Ordinance – Section 36-410
The project would not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36-410). Construction operations would occur only during permitted hours of operation pursuant to Section 36-410. Also, it is not anticipated that the project would operate construction equipment in excess of 75 dB for more than 8 hours during a 24-hour period.

Cumulative noise effects would be less than significant because the project would be in compliance with General Plan Noise Element and Noise Ordinance as described above, and because of the distance, topography, and vegetation between the project site and off-Reservation residential uses. It is not expected that the project will substantially increase traffic (and associated noise) because it is anticipated that the majority of hotel guests will be existing Casino patrons who decided to stay overnight at the hotel. This assumption would be addressed as part of the TEIR traffic study, and the results used to calculate project-related noise impacts.

b) Exposure of off-Reservation persons to excessive groundborne vibration or groundborne noise levels?

- ■ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels in the surrounding area. Construction of the proposed hotel and Casino demolish/rebuild could result in temporary off-site vibration. Whether that vibration level would be considered significant at the nearest existing off-Reservation homes would be reviewed as part of the TEIR noise study.

c) A substantial permanent increase in ambient noise levels in the off-Reservation vicinity of the project?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ■ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: Studies completed by the Organization of Industry Standards (ISO 1996 1-3 and ISO 3740-3747) indicates an increase of 10 dB is perceived as twice as loud and is perceived as a significant increase in the ambient noise level. Typically, a 3 dB increase in ambient sound levels would be perceptible, and has been used as a significance criterion for noise impacts.

It is possible that noise during construction of the hotel and Casino demolish and rebuild could result in temporary off-Reservation impacts at nearby off-Reservation homes, but project compliance with County construction noise regulations and procedures make it unlikely that such temporary impacts would be found significant. It is also considered unlikely that hotel and Casino operations after completion of construction would result in significant noise impacts, but these issues would be addressed in the TEIR noise study.

d) A substantial temporary or periodic increase in ambient noise levels in the off-Reservation vicinity of the project?

- ■ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The project does not involve any uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity including but not limited to extractive industry; outdoor commercial or industrial uses that involve crushing, cutting, drilling, grinding, or blasting of raw materials; truck depots, transfer stations or delivery areas; or outdoor sound systems. However, increases in Casino-related traffic along Willows Road may result in periods of traffic noise. This issue would be addressed in the TEIR noise study.

Also, general construction noise is not expected to exceed the construction noise limits of the County of San Diego Noise Ordinance (Section 36-410), which are derived from State regulations to address human health and quality of life concerns. Construction operations would occur only during permitted hours of operation pursuant to Section 36-410. Also, it is not anticipated that the project would operate construction equipment in excess of 75 dB for more than an 8 hours during a 24-hour period. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

XII. POPULATION AND HOUSING -- Would the project:

a) Induce substantial off-Reservation population growth?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ■ No Impact

Discussion/Explanation:

No Impact: The proposed project would not induce substantial population growth in the area because the project does not propose any physical or regulatory change that would remove a restriction to, or encourage population growth including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of

homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere off-Reservation?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
■ No Impact

Discussion/Explanation:

No Impact: The proposed project would not displace any existing housing since it is entirely within the Viejas Casino & Resort complex and the site for the new hotel is currently paved and is used for vehicle parking.

XIII. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered off-Reservation governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

Fire protection?
Police protection?
Schools?
Parks?
Other public facilities?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
■ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed hotel component of the proposed project represents an incremental expansion of the existing Viejas Casino & Resort complex. Schools, parks and other public facilities are not required to support this expansion. Fire protection is provided by Viejas Tribal Government and through the Tribe's cooperative agreements with neighboring Fire Districts. Police protection is provided by the Viejas Security Department and by contract with the San Diego County Sheriff. It is not anticipated that this new hotel would substantially change the level of service currently provided by the Sheriff or local Fire Districts.

XIV. RECREATION

a) Would the project increase the use of existing off-Reservation neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ■ No Impact

Discussion/Explanation:

No Impact: The project does not propose any residential use, including but not limited to a residential subdivision, mobile home park, or single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity.

XV. TRANSPORTATION/TRAFFIC -- Would the project:

a) Cause an increase in off-Reservation traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?

- ■ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: It is possible that the proposed hotel and Casino reconstruction and renovation would result in additional daily trips on Willows Road in the vicinity of the Reservation. The expected number of additional trips would be identified and analyzed in a traffic study. This is considered a potentially significant impact. A traffic study would be prepared to determine if the proposed project would result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at nearby intersections.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated off-Reservation roads or highways?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ■ No Impact

Discussion/Explanation:

No Impact: Willows Road and I-8 in the vicinity of the Reservation is not a congestion management program (CMP) road. I-8 is a CMP road per County thresholds; however, SANDAG is no longer using CMP (SANDAG, 2015). Therefore, the project cannot exceed a level of service established by a congestion management agency as a level of service is not established.

c) Substantially increase hazards due to an off-Reservation design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

■ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: A traffic study would be prepared to investigate if there are off-Reservation hazardous design features that would be used by the guests and suppliers of the proposed hotel. If such features are discovered, the traffic study would include an assessment of whether the project substantially increases hazards at such features. Interstate-8 and Willows Road in the project vicinity are not known to carry incompatible vehicles and the guests and suppliers of the hotel Casino would not operate incompatible vehicles.

d) Result in inadequate emergency access for off-Reservation responders?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	■ No Impact

Discussion/Explanation:

No Impact: The proposed project would not result in inadequate emergency access. The project is not served by a dead-end road; therefore, the project has adequate emergency access for off-Reservation responders.

XVI. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed off-Reservation wastewater treatment requirements of the applicable Regional Water Quality Control Board?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	■ No Impact

Discussion/Explanation:

No Impact: The proposed project would discharge wastewater to a Tribe operated community sewer system that is located on the Reservation and permitted to operate by the United States Environmental Protection Agency. Effluent is not discharged off-Reservation; therefore, there are no applicable off-Reservation wastewater treatment requirements.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant off-Reservation environmental effects?

☐	Potentially Significant Impact	■	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less Than Significant Impact: Anticipated maximum project-related potable water use and anticipated sewage effluent volumes would be addressed in the Water Supply Analysis. The proposed project is not expected to require the construction or expansion of water or wastewater treatment facilities. Therefore, the project is not expected to have the potential to result in significant off-Reservation environmental effects.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant off-Reservation environmental effects?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	■	No Impact

Discussion/Explanation:

No Impact: The project does not include new or expanded storm water drainage facilities. The project does not involve any substantial landform modification or increase in impervious surfaces and there are existing source treatment/structural BMPs for storm water during operations. Construction BMPs in conformance with the Clean Water Act would be identified prior to construction, and subsequently employed during project construction. Therefore, the project would not require any construction of new or expanded facilities that could cause significant off-Reservation environmental effects.

d) Result in a determination by an off-Reservation wastewater treatment provider (if applicable), which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	■	No Impact

Discussion/Explanation:

No Impact: The project's wastewater service is provided by the on-Reservation Viejas Water Reclamation Plant. Therefore, there would be no project-related effect on any off-Reservation wastewater treatment provider.

XVII. CUMULATIVE EFFECTS:

a) Would the project have impacts that are individually limited, but cumulatively considerable off-Reservation? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past, current, or probable future projects.

■	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Potentially Significant Impact: Traffic and air quality impacts may be cumulatively significant as described above. Potential cumulative impacts would be addressed during TEIR preparation.

REFERENCES

Brown & Caldwell, 2001
Water and Wastewater Master Plan for Viejas Reservation

Environmental Navigation Services, Inc., 2014
Supporting Water Supply Evaluation, Viejas Hotel South Tower

SANDAG, 2015
San Diego Forward: The Regional Plan, San Diego Association of Governments and AECOM, October 2015.

Viejas Band of Kumeyaay Indians, 2014
Amended and Restated Tribal-State Gaming Compact between the State of California and the Viejas Band of Kumeyaay Indians, August 13, 2014. (2014 Viejas State-Tribal Compact)

Nova Services, Inc., 2015
Preliminary Geotechnical Investigation Viejas Hotel & Casino Phase 3, dated May 13, 2016.