

EXHIBIT 1

COMMENT LETTERS

Agencies



REGION 9

SAN FRANCISCO, CA 94105

April 29, 2024

Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, California 95825

Subject: EPA Comments on the Final Environmental Impact Statement for the Redding Rancheria Fee to-Trust and Casino Project, Shasta County, California (CEQ/EIS No. 20240054)

Dear Chad Broussard:

The U.S. Environmental Protection Agency has reviewed the above-referenced document. We are providing comments pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. EPA is also serving as a cooperating agency on the project and provided scoping comments (December 26, 2016), comments on the Administrative Draft EIS (November 20, 2017), Draft EIS comments (June 3, 2019), and review of the Administrative Final EIS (January 16, 2024).

In our comments on the Administrative and Public Draft EIS, we expressed concerns regarding drainage and flooding issues since: (1) the development would occur within the designated 500-year floodplain, (2) the DEIS identified the potential for flooding from Churn Creek to overflow the project site from the east, and (3) planning for stormwater management did not appear to account for the increases in extreme precipitation already occurring and predicted to occur under climate change. Additionally, the project would abut the Sacramento River to the west, which is actively eroding, and while streambank stabilization is part of the project, the project did not appear to plan the setback of project facilities from the river to address potential future erosion under extreme rainfall and flooding conditions.

The Final EIS indicates that the on-site storm drain system has been oversized to accommodate increased flows to at least 140 percent of current design flows, and that finished floor elevations of all structures (there will be no basements) would be approximately 3 feet above the FEMA 100-year floodplain elevation. If on-site flooding does occur after development, we appreciate that the FEIS confirms that all access routes from the building sites to the main access road will be sufficiently elevated to provide safe ingress and egress for evacuations or first responders during flood events, consistent with our flood safety comment. Regarding the setback from the Sacramento River, while we

recommended a 200-foot setback, we strongly recommended against any setback less than 150 feet, and we note that the project now commits to a 150-foot setback for project facilities.

We also commented on the on-site wastewater treatment plant option, requesting clarification of the design standards to be used, since the DEIS had referenced “USEPA’s standards” for leach field design. We appreciate this reference being removed from Appendix M, although it is still present in the response to comments document. The FEIS continues to identify the Underground Injection Control Program for determining what test locations fall outside the standard range for “usable disposal material,” and it is still unclear which specific part of the UIC Program is being referenced. We recommend any additional clarifications regarding wastewater treatment design standards be indicated in the Record of Decision.

Finally, we note that under Water Supply Option 2, potable water supply to serve the Proposed Project would be provided through the installation of onsite groundwater wells. Should this option be pursued, this drinking water system would provisionally be classified as a Non-Transient/Non-Community Public Water System¹ under the Safe Drinking Water Act and would be subject to requirements for NTNC systems. Please consult with the EPA early in the process of setting up the public drinking water system, in order to conduct baseline monitoring and submit the monitoring results to EPA prior to public water use. The EPA point of contact is Ian Chinn, who can be reached at (415) 972-3418 or chinn.ian@epa.gov.

The EPA appreciates the opportunity to serve as a cooperating agency for this project. We would appreciate receiving a copy of the Record of Decision when it is available. Please send an electronic copy to Karen Vitulano, the lead reviewer for this project, at vitulano.karen@epa.gov. If you have any questions, please contact me at (213) 244-1834 or contact Karen at (415) 947-4178 or via email.

Sincerely,

Francisco Dóñez
Acting Manager
Environmental Review Section 2

cc: Jack Potter, Chairman, Redding Rancheria
Tyler Edwards, EPA Manager, Redding Rancheria

¹ A public water system is defined as any entity serving water for the purposes of human consumption to 15 or more active service connections or 25 or more people at least 60 days out of the year.

From: Battles, Michael@DOT <Michael.Battles@dot.ca.gov>
Sent: Thursday, May 2, 2024 10:12 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Grah, Kathy M@DOT <kathy.grah@dot.ca.gov>; Babcock, Kelly M@DOT <kelly.babcock@dot.ca.gov>; Ditzler, Brett L@DOT <brett.ditzler@dot.ca.gov>; Quigley, Tamy D@DOT <tamy.quigley@dot.ca.gov>
Subject: [EXTERNAL] Caltrans Comments Letter-Redding Rancheria FEIS

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good morning,

Please accept the attached comments letter from Caltrans District 2 for the proposed Redding Rancheria Fee-to-Trust and Casino Final EIS. Thank you for the opportunity to review and comment on this proposed project.

Sincerely,

Mike Battles
Regional Planning/Local Development Review
Caltrans District 2

One attachment • Scanned by Gmail

California Department of Transportation

DISTRICT 2, DIVISION OF TRANSPORTATION PLANNING
1657 RIVERSIDE DRIVE
REDDING, CA 96001
(530) 782-3055
www.dot.ca.gov



May 2, 2024

Mr. Chad Broussard
Environmental Protection Specialist
Pacific Region, Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Broussard:

Caltrans has received and reviewed the Final Environmental Impact Statement (FEIS) for the proposed Redding Rancheria Fee-To-Trust and Casino Project, to be located on approximately 232 acres bound by Bechelli Lane to the north, private properties to the south, the Sacramento River to the west, and Interstate 5 to the east. After reviewing the FEIS, Caltrans District 2 staff have the following comments and concerns in the area of hydraulics and traffic operations:

Hydraulics Comments

The response by the Bureau of Indian Affairs to Caltrans recent hydraulics comment about the proposed Alternative E Site in Anderson states "The majority of the Anderson Site is located within the 100-Year floodplain of the Tormey Drain. However, for the reasons described in Draft EIS Section 4.3.5, Alternative E would be EO 11988 compliant provided that the "Letter of Map Revision-Fill" is filed with FEMA."

Draft EIS Section 4.3.5 (referenced above) states in part, "The grading for Alternative E would be balanced earthwork operations, in which the cut and fill quantities would each equal 138,000 cubic yards. Thus, there would be no net introduction of fill within the FEMA 100-year floodplain, and pre-development flood levels at all locations up- and downstream of the Anderson Site would be maintained. Additionally, no levees would be constructed, no net loss or gain within the floodplain would occur, and the floodplain capacity will not be altered."

As Caltrans stated in our prior hydraulics comments made in February 2024, Caltrans does not agree with the idea that balancing cut and fill volumes will necessarily maintain pre-development flood levels. Consider an example where a large pit is excavated, and the spoils are placed in a waterway, partially blocking the flow. This would cause flood levels to rise upstream of the development, and may direct flow to different locations downstream compared to pre-project conditions.

An accurate stream model would be necessary to determine upstream and downstream impacts within this floodplain, including whether culverts under I-5 north of Tormey Drain or existing Caltrans detention basins near Tormey Drain would be impacted.

Traffic Operations Comments

Traffic Safety

While the Traffic Impact Study (TIS) did review and calculate the fair-share percentage for mitigation of the proposed development traffic, it did not calculate the potential opening day queues on the I-5 ramps. Potential queues for 2040 were provided in Appendix L. In these tables, it is shown that the queue for the southbound right from the I-5 offramp will exceed the available storage length without mitigation. As this is the only available information (lacking 2025 analysis), Caltrans believes it is prudent to assume this project has the potential to create a safety concern, as the difference between mainline and the ramps will be greater than 30 miles per hour.

Operations

Based on the results of the TIS, it is evident that the proposed development will negatively affect the operations of the I-5/South Bonnyview ramps. Additionally, there is a clear safety concern with the potential queues of the SB off-ramp. We believe that the mitigating improvements as described in the Proposed Project Mitigations of the February 2023 Kimley Horn TIS for the I-5/South Bonnyview ramps should be installed prior to occupancy/operation of the proposed development.

Caltrans continues to engage and consult with Redding Rancheria through ongoing coordination and partnership. District 2 supports the overall goals of economic, cultural, and social advancement and growth of our tribal partners. We thank you for the opportunity to provide comments and look forward to continued collaboration with Redding Rancheria. If you have any questions regarding any of the provided comments, please feel free to contact Michael Battles, Local Development Review Coordinator, at Michael.battles@dot.ca.gov, or at 530-782-3055.

Sincerely,



Brett Ditzler

Deputy District Director, Planning and Local Assistance
Caltrans District 2



CITY OF REDDING
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Tenessa Audette, Mayor
taudette@cityofredding.org
530.225.4447

April 16, 2024

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

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825
via electronic mail: chad.broussard@bia.gov

SUBJECT: FEIS COMMENTS, Redding Rancheria Project

Dear Director Dutschke and Mr. Broussard,

The City of Redding (City), as a Cooperating Agency, pursuant to NEPA for the Final Environmental Impact Statement (FEIS) for the Redding Rancheria Win-River Casino Relocation Project (City) appreciates this opportunity to provide comments regarding this Project as follows:

ECONOMIC IMPACT

The following excerpts are from Section 4.7.1, Substitution Effects, of the FEIS:

“Potential substitution effects (the loss of customers at existing commercial businesses to the new business) of a tribal casino on existing gaming, restaurant, recreation, and retail establishments have been considered when evaluating the magnitude of the casino’s impact on the economy.”

“A portion of the substitution effects would come from spending on non-gaming categories, such as food and beverage, retail, lodging, and entertainment that would have occurred at the competing gaming operations had the gaming spending occurred there rather than at Alternative A. A smaller portion would come from spending that would have occurred at non-gaming related businesses but went to Alternative A instead.”

The FEIS identifies a possible negative economic impact to existing sporting goods stores in the City, yet does not identify how these will be mitigated. The demand for sporting goods in Shasta County cannot support the existing stores along with the additional store being proposed. Existing stores can expect to see a 24 % decrease in sales as a result of the new store opening. The closure of existing stores in Redding will result in a decrease in sales tax revenue to the City. Vacant stores can lead to an increase in unemployment, crime, and blight.

Furthermore, the FEIS fails to provide any analysis of how the two proposed entertainment venues will impact Civic Auditorium. The report simply states that the types of shows that would be held at the proposed new venues would not be the type held at the Civic Auditorium; therefore, there would not be competition among the sites. This simplistic approach fails to recognize that the market for entertainment acts and shows is very limited based upon our population. The auditoriums proposed are nearly identical in size to the Civic Auditorium

Attachment: ^Draft Rancheria FEIS Comment Letter - Revised 4/15/24 (9.4(a))--Redding Rancheria Fee-To-Trust and Casino Project Final

and would certainly accommodate the same types of events and acts. The Civic Auditorium has a long history of operating in a deficit, thereby depleting valuable financial resources from the City's General Fund. It wasn't until very recently that the Civic Auditorium became self-sufficient. Adding two new venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the City's General Fund.

TRANSPORTATION/CIRCULATION

Section 4.8, *Transportation/Circulation*, of the FEIS summarizes the Traffic Impact Study - Redding Rancheria (TIS) prepared by Kimley-Horn (2023 Update) and attached to the FEIS as Appendix Q. The following excerpt is from Section 4.8.1, *Transportation/Circulation – Analysis Methodology of the FEIS*:

“Typical Friday PM and Saturday PM peak hours were chosen for representative samples of peak hour activity based on existing traffic volume information and expected trip generation of the Proposed Project.”

After detailed analysis (attached) and independent verification, the City has concluded that the Weekday AM and PM peak hours do not represent the peak hour activity. The City's analysis has indicated that the Saturday Mid-Day peak hour (not analyzed in the TIS) represents the peak hour activity. The City's independent analysis indicates that the Saturday Mid-Day peak hour is likely to generate 16.5% higher traffic volumes than either the Friday or Saturday PM peak hours that were assumed as the peak hour activity, analyzed in the TIS and included in the FEIS. Although an increase in traffic volume of 16.5% may not seem significant, the addition of any traffic to roadway infrastructure that is currently operating at or near its capacity, can have significant impacts on operations and safety. Therefore, the FEIS must include an evaluation on the Saturday Mid-Day peak hour traffic condition and update all corresponding analyses and mitigations, accordingly, in order to accurately identify impacts and determine appropriate mitigation measures.

Additionally, Section 4.8, *Transportation/Circulation, of the FEIS* (including the TIS as included as Appendix Q) fails to accurately evaluate either an Opening Year plus Project or a Cumulative and Cumulative plus Project scenario. These analyses are critical in determining whether the existing in-place and programmed future transportation infrastructure have the capacity to accommodate the traffic generated by the Project. Furthermore, the FEIS does not include an accurate representation of the current transportation infrastructure in the general vicinity of the Project. Therefore, the FEIS must accurately evaluate the omitted industry standard traffic analysis scenarios in order to accurately identify impacts and determine appropriate mitigation measures.

Section 4.8, *Transportation/Circulation, of the FEIS* (including the TIS as included as Appendix Q) vehicle queuing and operations were not evaluated along the South Bonnyview Road corridor. Given the closely spaced intersections (roundabouts, signals, on/off ramps, driveways, etc.) a high-level, detailed analysis is required to estimate vehicular capacities, delays and queuing. The FEIS does not include such an analysis. Therefore, the FEIS must perform a high-level, detailed operational analysis of the South Bonnyview Road corridor in order to accurately identify impacts and determine appropriate mitigation measures.

The following excerpt is from Section 5.8, *Transportation*, of the FEIS:

*“Where transportation infrastructure is shown as having an unacceptable level of service (LOS) with the addition of traffic from the Project alternatives (and caused at least in part from Project traffic), the Tribe shall pay for a fair share of costs for the recommended mitigation (including right-of-way and any other environmental mitigation). In such cases, the Tribe shall be responsible for the incremental impact that the added Project trips generate, calculated as a percentage of the costs involved for construction of the mitigation measure (referred to as the fair share). The fair share is calculated using the methodology presented in the Caltrans Guide for the Preparation of Traffic Impact Studies (2002; **Appendix F**). The Tribe shall make fair share contributions available prior to initiation of Project construction.”*



The City contests the FEIS, as it failed to follow standard industry practices regarding Traffic Impact Studies by not considering the appropriate peak hour activity, using faulty assumptions in critical analysis scenarios (Opening Day plus Project as well as Cumulative and Cumulative plus Project) and inadequately evaluating vehicular operations along the South Bonnyview Road corridor. As a result, the impacts identified in the FEIS and assumption of a fair share contribution are not founded on the appropriate analyses. Therefore, the FEIS must adjust the analyses to include the highest peak hour activity, use appropriate assumptions in critical scenarios and perform a detailed analysis of the South Bonnyview Road corridor in order to accurately identify impacts and determine appropriate mitigation measures.

PUBLIC SERVICES

ELECTRICITY

The following excerpt is from Section 4.10.1, *Alternative A – Proposed Project*, of the FEIS:

“The City of Redding’s General Plan Policy CDD1G states the following with respect to the provision of public services “Require annexation before services are provided by the City, except under extraordinary circumstances.” As discussed in more detail below, it is anticipated that the City may provide several public services to the project, which could include water supply service, wastewater service, and electricity. Once the property is taken into trust, local land use regulations would not apply, and neither the County (nor the City, should it pursue annexation of the site) would have land use jurisdiction. This would constitute extraordinary circumstances as described by the City’s General Plan Policy CDD1G. Therefore, it appears that the provision of public services to the site by the City would be in accordance with General Plan.”

The assumption that electricity to serve the project under Alternative A will be provided by the City’s Electric Utility (REU) is speculative since the subject property is located outside of the City Limits. Whether or not electricity is provided by REU to properties outside the City Limits is at the discretion of the Redding City Council. Therefore, the FEIS must also include an analysis of Alternative A without electricity provided by REU.

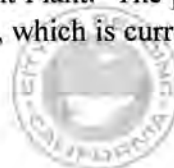
WATER SUPPLY

As specified in Volume II Appendices, Appendix M, 4.3 *Off-Site Option: City of Redding Water Service*, 4.3.1 *City of Redding Water System Design Criteria*, the City’s water supply system would need to be extended to the Project Site. Although the City’s water service contract with the U.S. Bureau of Reclamation does not permit the City to provide surface water outside of the City’s service water contract boundaries, the City has the ability to provide groundwater to the Project site. Therefore, 4.3 *Off-Site Option: City Provided Drinking Water Service*, is a potentially feasible option, although any such service is at the discretion of the Redding City Council.

Detailed analysis of the City’s water system capacity and adjacent infrastructure is required at final design stages for actual capacity and future needs.

WASTEWATER SERVICE

As specified in Volume II Appendices, Appendix M, 3.4 *Off-Site Option: City Provided Sewer Services*, 3.4.1, *City of Redding Wastewater Design Criteria*, additional capacity is needed in the City’s wastewater system just north of the Clear Creek Wastewater Treatment Plant. The project that will address this capacity issue is the Westside Interceptor Phase III pipeline project, which is currently in design and is anticipated for construction



in 2025. The FEIS references the City's 2012 Wastewater Master Plan. There is a new 2022 Wastewater Master Plan available and shall be used for current and future analysis.

Detailed analysis of the City's Sunnyhill Lift Station and adjacent upstream and downstream collection system is required at final design stages for actual capacity and future needs.

5.1 *Onsite Wastewater Management*, 5.1.1, includes a reference to "dewatered solids for proper landfill disposal." Per AB 341, landfills will no longer accept wastewater biosolids by 2025. Similar reference was found in section 5.1.5.

Whether or not wastewater service is provided to properties outside the City Limits is at the discretion of the Redding City Council.

AESTHETICS

The following excerpt is from Section 4.13-1, *Aesthetics-Operational Impacts*, of the FEIS:

"The proposed development would substantially alter the visual character of the northern portion of the site by transforming it from rural, undeveloped greenspace along the Sacramento River to commercial development. However, the proposed development would not be out of character with typical roadside development adjacent to I-5 (such as large commercial developments, including the Mt. Shasta Mall, located along I-5 within the City), nor would it impede views of scenic resources."

We do not concur with the conclusion that the proposed development would not be out of character with typical roadside development adjacent to I-5 and would not impede views of scenic resources. Within the City, existing, approved, and proposed developments adjacent to I-5 differ substantially from the character of the proposed project with respect to building mass and height. The proposed nine-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City. Although the proposed height of the parking structure is not specified, it appears to be four stories; there are no existing, approved, or proposed parking structures within the City adjacent to I-5. As illustrated in Exhibit 4.13-2, the proposed hotel and parking structure would substantially impede the visibility of the mountains which are currently visible along the west side of I-5 at the City's southern gateway.

The proposed sign plan must be more clearly described; it is not clear if the five large panels depicted along the front of the parking structure are proposed signs and, if so, what type of signs are proposed. If these panels are proposed signs, then the project's signage would be substantially out of character with existing, approved, and proposed signage adjacent to I-5 within the City. This issue would be further exacerbated if these signs are electronic message board signs, which are prohibited within the City.

CULTURAL RESOURCES

Cultural pedestrian surveys were conducted on a large area that includes the Alternative "A" development site, the utility corridor, and the northern and southern access routes. However, Extended Phase I or Phase II subsurface testing was not performed within the proposed water and wastewater utility corridors. As discussed in the FEIS, CA-SHA-4413 lies immediately south of the proposed utility corridor. While the studies concludes that CA-SHA-4413 is not eligible for listing in the National Register and development of Alternative "A" (Strawberry Fields Site) would not result in direct adverse effects to known historic properties, the FEIS also indicates that unknown aspects of CA-SHA-4413 may be uncovered during construction, which would change the evaluation of the site's National Register of Historic Places (NRHP) eligibility.



If the City were to consider a utility agreement with the Redding Rancheria, additional studies and information regarding potential cultural impacts would be required. Extended Phase I, and possibly Phase II, studies will be required to determine if CA-SHA-4413 extends into the utility corridor and if any newly discovered resources would change the evaluation of the site's NRHP eligibility.

The FEIS mitigation measures were updated to include preparation of an Unanticipated Discovery Plan to address the treatment of any newly discovered resources. While this type of plan is always beneficial, it does not negate the need to perform all necessary technical studies required to evaluate the project's impact on the environment. The City has determined that the cultural studies are incomplete, as testing was not performed in a proposed area of direct impact (utility corridor) that is immediately adjacent to a known cultural site.

Pursuant to Section 21001.1 of the California Environmental Quality Act (CEQA) Guidelines, it is the policy of the State of California, that projects to be carried out by public agencies be subject to the same level of review and consideration as that of private projects required to be approved by public agencies. Accordingly, any agreements or projects involving City infrastructure would be subject to environmental review under CEQA.

The City looks forward to continued cooperation with the BIA regarding this project and welcomes the opportunity to meet with BIAs staff and/or its consultants, and/or Redding Rancheria representatives to discuss our comments in further detail.

Sincerely,

Tenessa Audette
Mayor
City of Redding

Attachment – Technical Memorandum (GHD, 2024)





Technical Memorandum

April 11, 2024

To	Michael Webb, PE	Title	Director of Public Works, City of Redding
Copy to	Russell Wenham, PE, TE, PTOE	Copy to	Joshua Anthony, City of Redding
From	Kamesh Vedula, PE, TE	Project No.	12639045
Project Name	Redding Rancheria Strawberry Fields Final EIS Review		
Subject	Review of the Transportation/Circulation Sections of the Final EIS for the Redding Rancheria Fee-to-Trust and Casino Project (Casino Project)		

Executive Summary

This memorandum documents GHD's review of the *Traffic Impact Study Redding Rancheria, February 2023* prepared by Kimley-Horn for the Redding Rancheria Casino Project's *Final Environmental Impact Statement (FEIS)*. The review was performed at the request of the City of Redding (City) for the purpose of assisting the City with their assessment of the adequacy of the FEIS as related to the determination of transportation/circulation impacts and mitigation measures that will be necessary for the Casino Project.

GHD's key findings are summarized below:

1. An industry standard Weekday AM Peak Hour analysis was not performed.
 - GHD concludes that the Weekday AM Peak Hour is not a controlling condition and therefore, omitting the standard analysis does not create issues for the City. **No additional work related to the Weekday AM Peak Hour condition is required for the City to have the information needed to determine impacts and mitigation measures for the Casino Project.**
2. An industry standard Weekday PM Peak Hour analysis was not performed.
 - The industry standard is to analyze the Weekday PM Peak Hour, which is the one hour with the highest traffic volume between 4:00 PM and 6:00 PM, on a typical weekday (Tuesday, Wednesday, or Thursday). This analysis period was requested in the City's May 22, 2019 written comments on the Draft EIS.
 - The FEIS asserts that the Friday PM Peak Hour, in the Plus Casino Project condition, is a controlling condition as opposed to the industry standard Tuesday, Wednesday, or Thursday.
 - GHD used available traffic data, and collected new traffic data, to assess the impact of analyzing the Friday PM Peak Hour vs the standard Weekday PM Peak Hour.
 - Based on GHD's analysis, the Weekday PM Peak Hour in Opening Year (2025) Plus Casino Project conditions are approximately equivalent to the Friday PM Peak Hour in Opening Year (2025) Plus Casino Project conditions.

This Technical Memorandum is provided as an interim output under our agreement with City of Redding. It is provided to foster discussion in relation to technical matter associated with the project and should not be relied upon in any way.

Attachment: ^Draft Rancheria FEIS Comment Letter - Revised 4/15/24 (9.4(a))--Redding Rancheria Fee-To-Trust and Casino Project Final

- GHD concludes that the Weekday PM Peak Hour conditions are not expected to result in new impacts that have not already been identified under the Friday PM Peak Hour. **No additional work related to the Weekday PM Peak Hour condition is required for the City to have the information needed to determine impacts and mitigation measures for the Casino Project.**
3. An industry standard Saturday Mid-Day Peak Hour analysis was not performed.
 - The industry standard is to analyze the Saturday Mid-Day Peak Hour, in the Plus Casino Project condition, which is the one hour with the highest traffic volumes between 11:00 AM and 3:00 PM, on a typical Saturday. This analysis period was requested in the City's May 22, 2019 written comments on the Draft EIS.
 - GHD used available traffic data, and collected new traffic data, to assess the impact of analyzing the Saturday PM Peak Hour vs the standard Saturday Mid-Day Peak Hour.
 - Based on GHD's analysis, Saturday Mid-Day Peak Hour in Opening Year (2025) Plus Casino Project conditions are estimated to have 16.5% higher traffic volumes than the Saturday PM Peak Hour in Opening Year (2025) Plus Casino Project conditions.
 - The FEIS incorrectly asserts that the Saturday PM Peak Hour is a controlling condition.
 - **As such, the FEIS significantly underestimates the controlling Saturday Peak Hour traffic conditions and thus does not provide the information needed to determine impacts and mitigation measures for the Casino Project.**
 4. An Existing (or Opening/Baseline Year) Plus Casino Project impact analysis is required.
 - This scenario is needed to determine the impacts and transportation solutions necessary if the Casino Project proceeds as proposed (occupancy in year 2025 as stated in the FEIS) and no other roadway improvements are in place for the greater freeway interchange area. This is a critical analysis scenario since the City currently does not have funding for major freeway interchange upgrades to accommodate City, County, and Casino Project traffic.
 - The FEIS did not include an accurate representation of the baseline conditions as it pertains to the roadway infrastructure. In November 2022, major freeway ramp improvements and the construction of the Bechelli Lane multi-lane roundabout were substantially completed and open to traffic. An analysis that models the interplay of the closely spaced intersections along the South Bonnyview Road corridor was not performed for the FEIS. **As such, the FEIS does not provide the information that the City needs to determine impacts and mitigation measures for the Opening Year (2025) Plus Casino Project conditions.**
 5. A Cumulative and a Cumulative Plus Casino Project analysis is required for the in-place roadway infrastructure in the greater freeway interchange area.
 - This scenario is needed to determine the impacts and transportation solutions necessary if the Casino proceeds as proposed and no other roadway infrastructure improvements are in place for the greater freeway interchange area.
 - The FEIS does not include analysis of the in-place roadway infrastructure nor the impact of the Casino Project on the current in-place roadway infrastructure. An analysis that models the interplay of the closely spaced intersections along the South Bonnyview Road corridor was not performed. **As such, GHD concludes that the FEIS does not provide the information that the City needs to determine impacts and mitigation measures for the Cumulative Year Plus Casino Project conditions.**
 6. The FEIS does not provide the required traffic modeling to determine vehicle queues.
 - In the freeway interchange area, the closely spaced intersections along the South Bonnyview Road corridor present unique interplay between intersections. The combination of closely spaced roundabouts and traffic signals requires the highest-level traffic modeling to estimate vehicular capacities, delays, and queuing. The FEIS does not provide this analysis.

- **As such, the FEIS does not provide the information that the City needs to determine impacts and mitigation measures for the Opening Year (2025) Plus Casino Project conditions or for the Cumulative Plus Project conditions.**

7. The mitigations proposed in the FEIS are incomplete.

- As stated above:
 - The Saturday Mid-Day Peak Hour conditions need to be analyzed to determine impacts and mitigation measures.
 - An analysis of the Casino Project traffic on the actual in-place roadway conditions was not performed.
 - Traffic modelling that addresses capacities, delays, and queuing, in the context of closely spaced roundabouts and traffic signals, has not been performed.
- The future Cumulative condition freeway interchange improvements, shown in the October 30, 2017 Project Study Report are very conceptual in nature when considering the cumulative impact of the Casino Project. Additionally, these same conceptual improvements are presented in the year 2020 River Crossing Marketplace Specific Plan Final Environmental Impact Report (EIR) associated with approval of the Costco project. **The conceptual improvements (along with the development of the Casino Project) were presented with the EIR, but were considered speculative. Said conceptual improvements will require significant vetting with additional traffic analysis and preliminary designs to determine viability.**
- A funding mechanism for the Diverging Diamond Interchange and second roundabout is not in place. Pursuant to *Anderson First Coalition vs. City of Anderson (June 30, 2005)*, the environmental document should not count on "...speculative traffic mitigation measures..." that are not reasonably funded/programmed. Put another way, an approving agency should not assume a future road improvement will be in place unless the assertion can be supported by actual funding mechanisms and plans. **With the very significant traffic impacts anticipated from the Casino Project, mitigation measures that require the construction of the improvements, as opposed to simply a "fair-share" payment, are required. The details of reimbursements and cost sharing can be deferred beyond the approval of the environmental document, but the fact that the mitigation improvements need to be constructed cannot be overlooked.**

This Technical Memorandum is provided under our agreement with City of Redding. It is provided to foster discussion in relation to technical matters associated with th Casino Project and should not be relied upon for other purposes.

1. Weekday AM Peak Hour

Introduction

A Weekday AM Peak Hour analysis was requested in the City's written comments on the Draft EIS (May 22, 2019). The industry standard is to analyze the Weekday AM Peak Hour, which is the one hour with the highest traffic volumes between 7:00 PM and 9:00 AM, on a typical weekday (Tuesday, Wednesday, or Thursday). The FEIS does not include a Weekday AM Peak Hour analysis, asserting that the Friday PM Peak Hour is a controlling condition as opposed to the industry standard Weekday AM Peak Hour.

The City requested GHD to provide further analysis to determine if the Weekday AM Peak Hour is likely to cause new impacts that have not already been identified.

Findings

Based on the available data, the industry standard Weekday AM Peak Hour volumes are approximately 12% less than the Friday PM Peak Hour volumes presented in the FEIS. Based on this investigation, the Weekday AM Peak Hour conditions are not expected to result in new impacts that have not already been identified and therefore, omitting the standard analysis does not create issues for the City.

No additional work related to this Peak Hour condition is required for the City to have the information needed to determine impacts and mitigation measures for the Casino Project.

Analysis

Casino Project Trips

Based on trip making characteristics at the Win-River casino, it was concluded that the Casino trips for the Weekday AM Peak Hour were found to be 56% lower than the Friday PM Peak Hour Casino trips.

Opening Year (2025) Plus Casino Project Conditions

The associated Casino Project trips were added to the Opening Year volumes consistent with the methodologies identified in the FEIS to estimate the Opening Year (2025) Plus Casino Project conditions. Refer to Table 1.1 **Error! Reference source not found.** for the comparison of the estimated (derived) Weekday AM Peak Hour volumes and the FEIS Friday PM Peak Hour volumes.

Given that the Weekday AM Peak Hour volumes are around 12% lower than the FEIS Friday PM Peak Hour volumes, the Weekday PM Peak Hour conditions are not expected to result in new impacts that have not already been identified.

Table 1.1 GHD's Estimated (Derived) Opening Year (2025) Plus Casino Project Volumes for Weekday AM Peak Hour

Intersection	Weekday AM Peak Hour Total ^{1,2}	Derived Weekday AM Casino Project Trips ^{1,3}	Derived Weekday AM Plus Casino Project Peak Hour Total ^{1,4}	FEIS Friday PM Plus Casino Project Peak Hour Total ⁵	Difference between Weekday AM and Friday PM Peak Hour Total
Bechelli Lane & South Bonnyview Road	3,383	637	4,020	4,780	-15.9%
Southbound I-5 Ramps & South Bonnyview Road	3,376	483	3,859	4,666	-17.3%
Northbound I-5 Ramps & South Bonnyview Road	3,185	248	3,433	3,640	-5.7%
Churn Creek Road & South Bonnyview Road	2,533	24	2,557	2,633	-2.9%
Total Entering Traffic Volume	12,477	1,392	13,869	15,719	-11.8%
<i>1 Peak Hour totals are the sum of all traffic entering the intersection</i>					
<i>2 Source: "Year 2020 Plus Project Weekday AM and PM Peak Hour Traffic Volumes", River Crossing Marketplace Specific Plan TIAR, September 2019</i>					
<i>3 Estimated to be approximately 56% of the FEIS' Friday PM Peak hour project trips</i>					
<i>4 Estimated to be Weekday AM Peak Hour total plus derived Weekday AM Casino Project Trips</i>					
<i>5 Source: Figure 36, "Year 2025 plus Project Friday/Saturday Peak Hour Volumes (1A)", FEIS</i>					

2. Weekday PM Peak Hour

Introduction

A Weekday PM Peak Hour analysis was requested in the City's written comments on the Draft EIS (May 22, 2019). The industry standard is to analyze the Weekday PM Peak Hour, which is the one hour with the highest traffic volumes between 4:00 PM and 6:00 PM, on a typical weekday (Tuesday, Wednesday, or Thursday). The FEIS does not include a Weekday PM Peak Hour analysis, asserting that the Friday PM Peak Hour is a controlling condition as opposed to the industry standard Weekday PM Peak Hour.

The City requested GHD to provide further analysis to determine if the Weekday PM Peak Hour is likely to cause new impacts that have not already been identified.

Findings

Based on the available data, the industry standard Weekday PM Peak Hour volumes are only around 1% higher than the Friday PM Peak Hour volumes presented in the FEIS. Based on this investigation, the Weekday PM Peak Hour conditions are not expected to result in new impacts that have not already been identified and therefore, omitting the standard analysis does not create issues for the City.

Analysis

Casino Project Trips

Based on trip making characteristics at the Win-River casino, it was concluded that the Casino trips for the Weekday PM Peak Hour are 9% lower than the Friday PM Peak Hour Casino trips.

Opening Year (2025) Plus Casino Project Conditions

The associated Casino Project trips were added to the Opening Year volumes consistent with the methodologies identified in the FEIS to estimate the Opening Year (2025) Plus Casino Project conditions. Refer to Table 2.1 **Error! Reference source not found.** for the comparison of the estimated (derived) Weekday PM Peak Hour volumes and the FEIS Friday PM Peak Hour volumes.

Given that the Weekday PM Peak Hour volumes are only around 1% higher than the FEIS Friday PM Peak Hour volumes, the Weekday PM Peak Hour conditions are not expected to result in new impacts that have not already been identified.

Table 2.1 GHD's Estimated (Derived) Opening Year (2025) Plus Casino Project Volumes for Weekday PM Peak Hour

Intersection	Weekday PM Peak Hour Total ^{1,2}	Derived Weekday PM Casino Project Trips ^{1,3}	Derived Weekday PM Plus Casino Project Peak Hour Total ^{1,4}	FEIS Friday PM Plus Casino Project Peak Hour Total ⁵	Difference between Weekday PM and Friday PM Peak Hour Total
Bechelli Lane & South Bonnyview Road	3,786	1,038	4,824	4,780	0.9%
Southbound I-5 Ramps & South Bonnyview Road	3,949	788	4,737	4,666	1.5%
Northbound I-5 Ramps & South Bonnyview Road	3,272	404	3,676	3,640	1.0%
Churn Creek Road & South Bonnyview Road	2,596	39	2,635	2,633	0.1%
Total Entering Traffic Volume	13,603	2,269	15,872	15,719	0.97%
<i>1 Peak Hour totals are the sum of all traffic entering the intersection</i>					
<i>2 Source: "Year 2020 Plus Project Weekday AM and PM Peak Hour Traffic Volumes", River Crossing Marketplace Specific Plan TIAR, September 2019</i>					
<i>3 Estimated to be approximately 91% of the FEIS' Friday PM Peak hour project trips</i>					
<i>4 Estimated to be Weekday PM Peak Hour total plus derived Weekday PM Casino Project Trips</i>					
<i>5 Source: Figure 36, "Year 2025 plus Project Friday/Saturday Peak Hour Volumes (1A)", FEIS</i>					

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3. Saturday Peak Hour

Introduction

A Saturday Mid-Day Peak Hour analysis was requested in the City's written comments on the Draft EIS (May 22, 2019). The industry standard is to analyze the Saturday Mid-Day Peak Hour, which is the highest one hour between 11:00 PM and 3:00 PM, on a typical Saturday. The FEIS does not include a Saturday Mid-Day Peak Hour analysis, asserting the Saturday PM Peak Hour is a controlling condition as opposed to the industry standard Saturday Mid-Day Peak Hour.

The City requested GHD to provide further analysis to determine if the Saturday Mid-Day Peak Hour is likely to cause new impacts that have not already been identified.

Findings

Based on this investigation, the industry standard Saturday Mid-Day Peak Hour represents a worse condition than the Saturday PM Peak Hour analysis presented in the FEIS. Therefore, the FEIS underestimates the controlling Saturday Peak Hour conditions and thus does not provide the information needed to determine impacts and mitigation measures for the Casino Project.

Analysis

Peak Hour Determination

Saturday intersection counts in the greater freeway interchange area were performed on Saturday, April 30, 2024, by Counts Unlimited (subconsultant to GHD). The counts at these intersections were for a 6-hour period, from 11:00 AM to 5:00 PM and provide GHD with the information necessary to determine the hourly traffic loading on the freeway interchange area.

In addition, 24-hour traffic counts (with 15-minute subtotals) were collected at the following locations:

- Redding Rancheria Road, just north of the Canyon Road intersection, in Redding, California
 - This count data provided GHD with the hourly distribution of traffic at the Redding Rancheria, which includes the Win-River Casino complex
- Everett Freeman Way, just south of Liberal Avenue, in Corning, California
 - This count data provided GHD with the hourly distribution of the traffic at the Rolling Hills Casino complex

Note: GHD collected traffic counts at Redding Rancheria and at Rolling Hills Casino in 2019 in addition to the counts listed above.

These traffic counts were reviewed by GHD and used in support of this Memorandum. The Saturday Mid-Day Peak Hour for the adjacent street traffic was determined to be at 12:30 PM, per intersection and daily counts in the greater interchange area.

Casino Project Trips

Based on trip making characteristics at the Win-River casino, it was concluded that the Casino Project trips between 12:30 PM and 1:30 PM when the adjacent street traffic peaks (Saturday Mid-Day Peak Hour) are 12% lower than the Saturday PM Peak Hour Casino trips.

Opening Year (2025) Plus Casino Project Conditions

The associated Casino Project trips were added to the Opening Year volumes consistent with the methodologies identified in the FEIS to estimate the Opening Year (2025) Plus Casino Project conditions. Refer to Table 3.1 **Error! Reference source not found.** for the comparison of the estimated (derived) Saturday Mid-Day Peak Hour volumes and the FEIS Saturday PM Peak Hour volumes.

Given that the Saturday Mid-Day Peak Hour volumes were approximately 16.5% higher than the FEIS' Saturday PM Peak Hour volumes, an updated Opening Year (2025) and Opening Year (2025) Plus Casino Project analysis is recommended for the Saturday Mid-Day Peak Hour of the adjacent street.

Table 3.1 GHD's Estimated (Derived) Opening Year (2025) Plus Casino Project Volumes for Saturday Mid-Day Peak Hour

Intersection	Saturday Mid-Day Peak Hour Total^{1,2}	Derived Saturday Mid-Day Casino Project Trips^{1,3}	Derived Saturday Mid-Day Plus Casino Project Peak Hour Total^{1,4}	FEIS Saturday PM Plus Casino Project Peak Hour Total⁵	Difference between Saturday Mid-Day and Saturday PM Peak Hour Total
Bechelli Lane & South Bonnyview Road	2,877	1,199	4,076	3,419	19.2%
Southbound I-5 Ramps & South Bonnyview Road	3,090	912	4,002	3,366	18.9%
Northbound I-5 Ramps & South Bonnyview Road	2,610	465	3,075	2,591	18.7%
Churn Creek Road & South Bonnyview Road	1,925	45	1,970	1,886	4.5%
Total Entering Traffic Volume	10,502	2,621	13,123	11,262	16.5%
<i>1 Peak Hour totals are the sum of all traffic entering the intersection</i>					
<i>2 Source: "Year 2020 Plus Project Saturday Mid-Day Peak Hour Traffic Volumes", River Crossing Marketplace Specific Plan TIAR, September 2019</i>					
<i>3 Estimated to be approximately 88% of the FEIS' Saturday peak hour trips plus the 2024 intersection peak hour volumes</i>					
<i>4 Estimated to be Saturday Mid-Day Peak Hour total plus derived Saturday Mid-Day Casino Project Trips</i>					
<i>5 Source: Figure 36, "Year 2025 plus Project Friday/Saturday Peak Hour Volumes (1A)", FEIS</i>					

4. Existing (or Opening/Baseline Year) Plus Casino Project Analysis

Introduction

Baseline Plus Casino Project analysis is needed to determine the impacts and transportation solutions necessary if the Casino Project proceeds as proposed (occupancy in year 2025 as stated in the FEIS) and no other roadway improvements are in place for the greater freeway interchange area. This is a critical analysis scenario, since the City currently does not have funding for major freeway interchange upgrades to accommodate City, County, and Casino Project traffic.

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Findings

The FEIS did not include an accurate representation of the baseline conditions as it pertains to the roadway infrastructure. In November 2022, major freeway ramp improvements and the Bechelli Lane multi-lane roundabout were substantially completed and open to traffic. An analysis that models the interplay of the closely spaced intersections along the South Bonnyview Road corridor was not performed for the FEIS. GHD concludes that the FEIS does not provide the information that the City needs to determine impacts and mitigation measures for the Opening Year (2025 Plus Casino Project Conditions in the Friday PM Peak Hour.

5. Cumulative Plus Casino Project Analysis

Introduction

The Cumulative and Cumulative Plus Casino Project conditions are needed to determine the impacts and transportation solutions necessary if the Casino proceeds as proposed and no other improvements are in place for the greater freeway interchange area.

Findings

GHD concludes the following for the Cumulative and Cumulative Plus Casino Project conditions.

- The Weekday AM Peak Hour analysis is not a controlling condition and therefore, omitting the standard analysis does not create issues for the City.
- The Weekday PM Peak Hour analysis will likely result in similar impacts to the Friday PM Peak Hour analysis and therefore, omitting the standard analysis does not create issues for the City.
- The FEIS does not include analysis of the in-place roadway infrastructure nor the impact of the Casino Project on the current in-place roadway infrastructure. An analysis that models the interplay of the closely spaced intersections along the South Bonnyview Road corridor was not performed. As such, GHD concludes that the FEIS does not provide the information that the City needs to determine impacts and mitigation measures for the Cumulative Plus Casino Project Conditions in the Friday PM Peak Hour.
- The Saturday Mid-Day Peak Hour is required to provide the information that the City needs to determine impacts and mitigation measures for this condition. Additionally, the analysis should also be performed to reflect in-place roadway infrastructure and the interplay of the closely spaced intersections along the South Bonnyview Road corridor.

Analysis

The Saturday Peak Hour volumes in the FEIS for Cumulative Plus Casino Project conditions at the intersections in the greater freeway interchange area were established by applying a factor to the Friday PM Peak Hour volumes derived from the 2017 *River Crossing Marketplace Specific Plan* TIAR. Table 3.1 concludes that the Saturday Mid-Day Peak Hour volumes were approximately 16.5% higher than the FEIS' Saturday PM Peak Hour volumes. Based on this data, an updated Cumulative and Cumulative Plus Casino Project with a Saturday Mid-Day Peak Hour in the afternoon (between 11:00 AM and 3:00 PM) are expected to result in new impacts and mitigations.

The FEIS did not include an accurate representation of the baseline conditions as it pertains to the roadway infrastructure. Furthermore, an analysis that documents an interplay on the closely spaced intersections along the Bonnyview Corridor was not performed. As such, GHD concludes that the FEIS does not provide the

information that the City needs to determine impacts and mitigation measures for the Cumulative Plus Casino Project Conditions.

6. Further Traffic Modeling

In the freeway interchange area, the closely spaced intersections along the South Bonnyview Road corridor present unique interplay between intersections. The combination of closely spaced roundabouts and traffic signals requires the highest-level traffic modeling to estimate vehicular capacities, delays, and vehicle queuing. The FEIS does not provide this analysis.

As such, the FEIS does not provide the information that the City needs to determine impacts and mitigation measures for the Opening Year (2025) Plus Casino Project conditions or for the Cumulative Plus Project conditions.

7. Mitigation Identification

As stated previously:

- The Saturday Mid-Day Peak Hour conditions need to be analyzed to determine impacts and mitigation measures.
- An analysis of the Casino Project traffic on the actual in-place roadway conditions was not performed.
- Traffic modelling that addresses capacities, delays, and queuing, in the context of closely spaced roundabouts and traffic signals, has not been performed.

The future Cumulative condition freeway interchange improvements, shown in the October 30, 2017 Project Study Report are very conceptual in nature when considering the cumulative impact of the Casino Project. Additionally, these same conceptual improvements are presented in the River Crossing Marketplace Specific Plan associated with approval of the Costco project. The conceptual improvements (along with the development of the Casino Project) were presented with the River Crossing project approval but were considered speculative. Said conceptual improvements will require significant vetting with additional traffic analysis and preliminary designs to determine viability.

A funding mechanism for the Diverging Diamond Interchange and second roundabout is not in place. Pursuant to Anderson First Coalition vs. City of Anderson (June 30, 2005), the environmental document should not count on "...speculative traffic mitigation measures..." that are not reasonably funded/programmed. Put another way, the court case indicates that an approving agency should not assume a future road improvement will be in place unless the assertion can be supported by actual funding mechanisms and plans. With the very significant traffic impacts anticipated from the Casino Project, mitigation measures that require the construction of the improvements, as opposed to simply a "fair-share" payment, are required. The details of reimbursements and cost sharing can be deferred beyond the approval of the environmental document, but the fact that the mitigation improvements need to be constructed cannot be overlooked.

Addressing the above items, and conducting full environmental review and preliminary engineering, will inform the final roadway and interchange improvements that will be needed to mitigate the project impacts.