



SUPPLEMENTAL INFORMATION REPORT

LOS COYOTES BAND OF CAHUILLA AND CUPEÑO INDIANS FEE-TO-TRUST AND HOTEL-CASINO PROJECT

MAY 2023

PREPARED FOR:

U.S. Department of the Interior,
Bureau of Indian Affairs
Pacific Region Office
2800 Cottage Way # W2820
Sacramento, CA 95825



PREPARED BY:

AES-Montrose
1801 7th Street, Suite 100
Sacramento, CA 95811
(916) 447-3479
www.analyticalcorp.com



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1.0 INTRODUCTION

The Los Coyotes Band of Cahuilla & Cupeño Indians (Tribe) Fee-to-Trust and Casino-Hotel Project (Project) was evaluated in a Final Environmental Impact Statement (EIS)/Tribal Environmental Impact Report (EIR) that was prepared in accordance with the National Environmental Policy Act (NEPA) and made available to the public on April 18, 2014 (referred to herein as the FEIS). The FEIS analyzed the following five alternatives:

- Alternative A – Barstow Casino-Hotel Complex
- Alternative B – Barstow Reduced Casino-Hotel Complex
- Alternative C – Los Coyotes Reservation Casino
- Alternative D – Los Coyotes Reservation Campground
- Alternative E – No Action

As discussed in Sections 2.4 and 2.5 of the FEIS, Alternative B was selected as the preferred alternative as it best met the purpose and need of the project while minimizing potential environmental impacts when compared to the larger Alternative A.

Due to the passage of time, this Supplemental Information Report (SIR) has been prepared to assist in the determination of whether changes in background environmental conditions, Project, or the regulatory setting require the preparation of a Supplemental Environmental Impact Statement (SEIS). The standard for determining whether an agency must prepare an SEIS is set out in 40 CFR § 1502.9(d)(1) of the Council on Environmental Quality (CEQ) regulations, which states that federal agencies shall prepare supplements to either draft or final EISs if:

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

This SIR presents the following for each applicable issue area addressed in the FEIS: (1) a summary of the environmental and regulatory setting as described in the FEIS, (2) a summary of environmental impacts and mitigation identified in the FEIS, (3) a discussion of changes to the environmental and regulatory setting since publication of the FEIS, and (4) an analysis of any changes to environmental impacts from the Project as a result of the changes to the environmental and regulatory setting, and whether these changes affect conclusions regarding environmental impacts within the FEIS and the recommended mitigation. Although the Tribe intends to move forwards with Alternative B, consistent with the determination of the FEIS, this document conservatively analyzes Alternative A, which is the higher-intensity and more impactful alternative.

2.0 DESCRIPTION OF ALTERNATIVE A

Since the release of the FEIS, there have been no planned changes to Alternative A, which consists of the following development components: (1) placement of three assessor's parcels in the City of Barstow (City) totaling approximately 23.1 acres into federal trust status on behalf of the Tribe; (2) issuance of a Two-Part Determination relevant to the fee-to-trust application; (3) approval of management contract and related collateral agreements; and (4) development of a casino and hotel with related amenities on the Barstow Site.

2.1 BARSTOW SITE

The approximately 23.1-acre Barstow Site is located within the incorporated boundaries of the City of Barstow, San Bernardino County (County), California, just east of Interstate 15 (I-15). State Highway (SH) 58, SH 247, and Interstate 40 (I-40) are located nearby. The Barstow Site is located south of Mercantile Way and east of Lenwood Road. Land to the north and west of the Barstow Site contains commercial/light industrial development. The Barstow Site is also bordered on the south by vacant land and on the east by the Stoddard Valley Off-Highway Vehicle (OHV) area, which is under the jurisdiction of the Bureau of Land Management (BLM). The Barstow Site is located within Section 27, Township 9N, Range 2W, San Bernardino Base Meridian, as depicted on the Barstow, U.S. Geological Survey (USGS) topographic quadrangle. The Barstow Site consists of the following assessor's parcel numbers (APN) 428-171-66, 428-171-67, and 428-171-68. **Figure 2-1** depicts the regional location of the Barstow Site, **Figure 2-2** shows the overall Barstow Site and vicinity, and **Figure 2-3** provides an aerial photo of the Barstow Site and parcel boundaries. **Figure 2-4** provides the site plan for Alternative A.

2.2 LAND TRUST ACTION

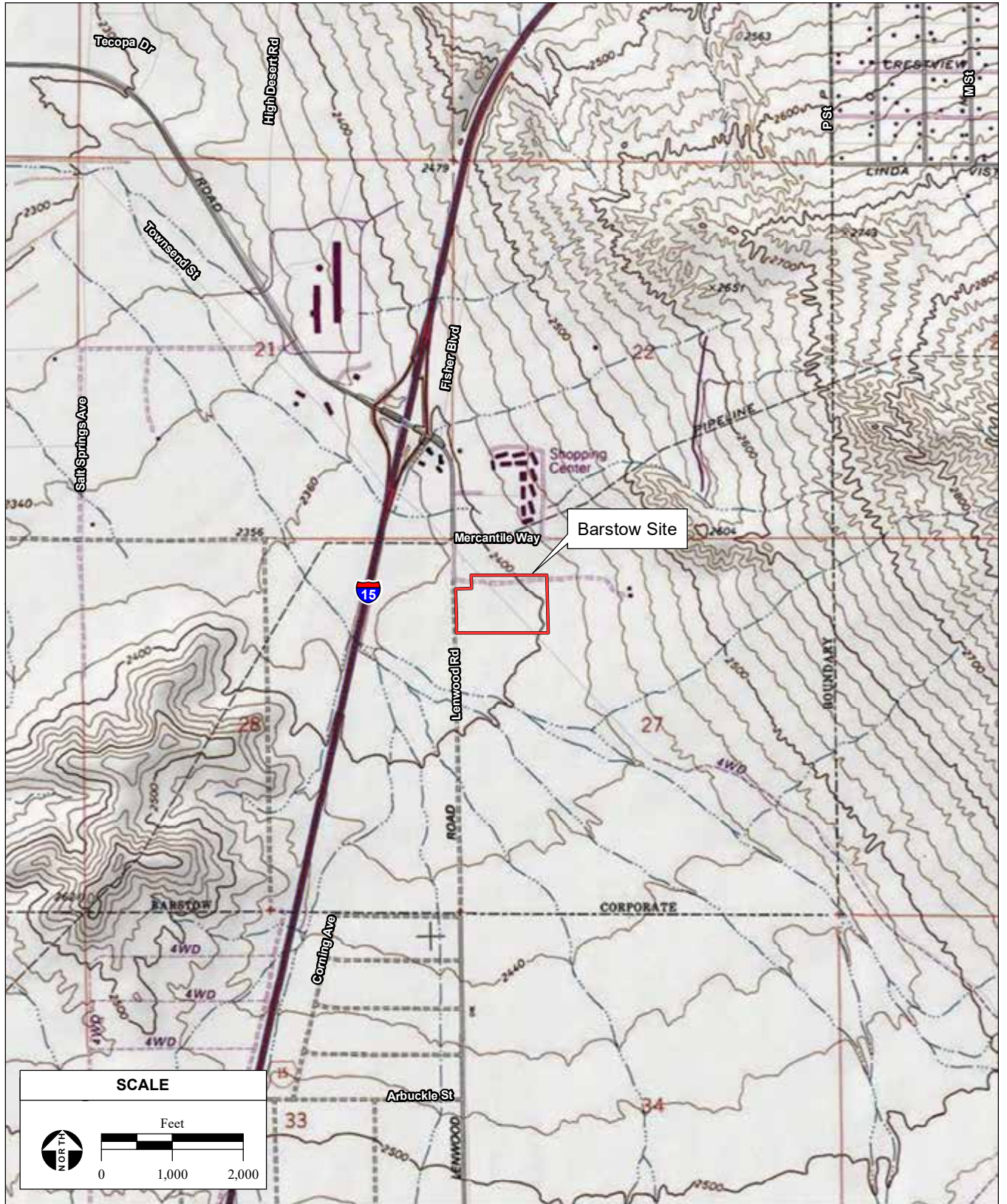
The Bureau of Indian Affairs (BIA) will make a determination regarding the fee-to-trust acquisition in accordance with the procedures set forth in 25 Code of Federal Regulations (CFR) Part 151. The Tribe's fee-to-trust application provides detailed information on the land proposed for trust status. The regulations in 25 CFR Part 151 implement Section 5 of the Indian Reorganization Act (IRA), codified at 25 U.S. Code (USC) § 5108. Section 5 of the IRA is the general statute that provides the Secretary of the Interior with authority to acquire lands in trust status for tribes and individual Indians. Because the Tribe is seeking to acquire off-reservation land in trust for gaming purposes, compliance with Section 20 of the Indian Gaming Regulatory Act (IGRA) is being considered with the BIA Part 151 fee-to-trust application.

2.3 TWO-PART SECRETARIAL DETERMINATION

IGRA allows gaming on tribal lands acquired after October 17, 1988, the date of its enactment, only if certain conditions enumerated in Section 20 are satisfied. In this case, acquisition of approximately 23.1 acres in trust for gaming would require that the Secretary of the Interior makes a "two-part determination," under Section 20(b)(1)(A), that gaming on the newly acquired lands would be in the best interest of the Tribe and not detrimental to the surrounding community (25 USC § 2719(b)(1)(A)). A Secretarial two-part determination may only be made after consultation with the Tribe and appropriate state and local officials, including officials of other nearby tribes. In addition, California's Governor must concur in the determination before gaming could occur on the Barstow property.



Figure 2-1
Regional Location - Barstow Site



SOURCE: "Barstow SE, CA" USGS 7.5 Minute Topographic Quadrangle,
 T9N R2W, Section 27, San Bernardino Baseline & Meridian;
 ESRI, 2022; AES, 10/17/2022

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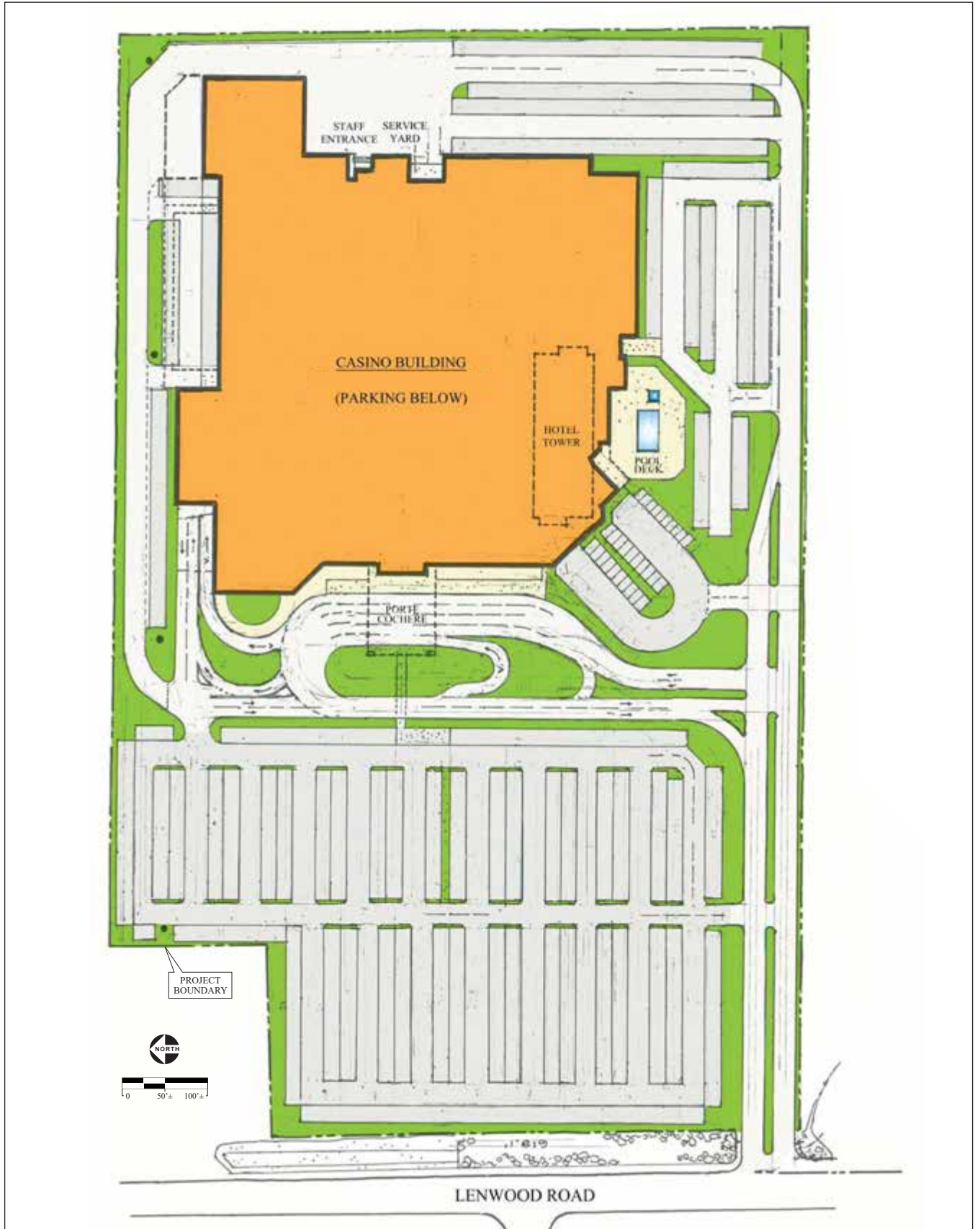
Figure 2-2
 Site and Vicinity - Barstow Site



SOURCE: San Bernardino County GIS, 2/18/2022; San Bernardino County aerial photograph, 2/5/2020; ESRI, 2022; AES, 10/17/2022

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Figure 2-3
Aerial Photograph - Barstow Site



SOURCE: Bergman Walls & Associates, 4/10/2009; AES, 10/17/2022

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Figure 2-4
Alternative A Site Plan

2.4 MANAGEMENT CONTRACT

Congress enacted IGRA with the stated purpose of providing a statutory basis for the operation and regulation of gaming by Native American tribal governments. As part of its regulatory function, the National Indian Gaming Commission (NIGC), which was established under IGRA, is charged with the authority to approve management contracts between tribal governments and outside management groups.

To approve a management contract, the NIGC must determine that the contract is consistent with IGRA in terms of contract period, management company payment, and protection of tribal authority; additionally, extensive background checks of the management company's key personnel are conducted.

The proposed management contract would assist the Tribe in obtaining funding for the development of the proposed hotel and casino complex and is necessary because the Tribe presently lacks the necessary expertise to manage such a complex. Once the facilities become operational, the management company would have the exclusive right to manage day-to-day operations of the hotel and casino complex for a specified period of time. The management company must comply with the terms of IGRA and NIGC's regulatory requirements relating to the operation of the Indian gaming facilities. The Tribal governments maintain the ultimate authority and responsibility for the development, operation, and management of the gaming facility pursuant to IGRA, NIGC regulations, Tribal Gaming Ordinances, and the Tribal/State Compact.

2.5 MUNICIPAL SERVICES AGREEMENT

The Tribe has entered into a Municipal Services Agreement (MSA) with the City of Barstow that applies only to Alternative A and Alternative B. In the MSA, the Tribe has agreed to compensate the City annually for potential and perceived impacts related to development of the casino-hotel complex on the Barstow Site. In turn, the City has agreed to support the efforts of the Tribe to take the Barstow Site into trust and develop a casino-hotel complex on the site (FEIS [Appendix D]). In October 2020, the Tribe and the City executed an amendment to the MSA, included herein as Attachment A. The amendment made the following updates to the MSA:

- Clarified that the Tribal-State Compact was still in negotiation.
- Clarified that the gaming facility would offer Class II gaming, Class III gaming, or both.
- Removed Barwest, LLC as the developer, as this company will no longer serve as the developer. As provided in the First Amended MSA (2006), the selected developer or manager must be approved by the City.
- Updated the listing address for Service of Process.

These revisions represent minor clarifications that do not alter the commitments identified and analyzed in the FEIS.

2.6 CASINO-HOTEL DEVELOPMENT

Alternative A is located within the incorporated boundaries of the City, just east of I-15; SH 58, SH 247, and I-40 are located nearby. Alternative A consists of the development of a casino with approximately 88,500 square feet of gaming floor, a 160-room hotel, and associated facilities.

Associated facilities would include food and beverage services, retail space, banquet/meeting space, and administration space. Food and beverage facilities would include two full service restaurants, a “drive-in” restaurant, a buffet, a coffee shop, three service bars, and a lounge bar. The 11-story high-rise hotel would include 16 rooms per floor and dining facility on the top floor. Both the gaming facility and the hotel would be open 24 hours a day, seven days a week, while the “drive-in” restaurant would be open from 10:30 a.m. to 10:30 p.m. **Table 1** provides a cumulative breakdown of proposed uses with associated square footages for the proposed hotel-casino complex. Approximately 1,309 on-site employment positions would be generated through the buildout of Alternative A.

The main access to the casino-hotel complex would be located along Lenwood Road at the southern boundary of the Barstow Site. Improvements to this access intersection would be made to manage the ingress and egress of traffic at the Barstow Site.

2.7 BEST MANAGEMENT PRACTICES

Construction and operation of Alternative A would incorporate a variety of industry standard Best Management Practices (BMP). In many cases, such as for Stormwater Pollution Prevention Plans (SWPPP) prepared for compliance with National Pollutant Discharge Elimination System (NPDES) permits, certain BMPs are requisite conditions of permit approval. Chapter 5.0 of the FEIS presents select BMPs that have been specifically incorporated into the project design to avoid or minimize potential adverse effects resulting from the development of Alternative A.

TABLE 1. ALTERNATIVE A – BARSTOW CASINO-HOTEL COMPLEX COMPONENTS

Area	Seats/Rooms/ Parking Spaces	Approx. Square Footage
Casino		
Casino Gaming		88,500
Casino Circulation and Elevators		5,400
Restrooms (2 sets)		6,000
Cashier’s Cage and Count		4,500
Back of House		32,020
Retail		
Gift Shop		900
Food and Beverage		
Lounge Bar	150	4,500
Service Bar (3)		3,200
Coffee Shop	120	3,200
Restaurants and Food Courts		14,700
Food and Beverage Offices		250
Kitchens		6,000
Entertainment/Amenities		
Night Club (2 stories)		9,000
Banquet Room		5,400
Meeting Rooms		1,800
Pre-Function		1,350
Arcade		5,400
Workout Area		1,800

Kids' Play Area		5,400
Hotel		
Lodging Area	160 rooms	113,600
High-Rise Dining Floor		11,360
Lobby/Registration		1,800
Elevator Penthouse		600
Baggage		600
Pool		
Swimming Pool	25' x 50'	
Whirlpool		
Pool Deck and Lounges		20,000
Pool Equipment		300
Employee Areas		
Staff Dining		1,800
Staff Lounge		1,800
Housekeeping and Porters		3,600
Uniform Issues + Change, Toilets		4,500
Support Facilities		
Central Plant		7,200
Warehouse		4,500
Loading Dock, Trash Dock		1,200
Engineering		4,500
Receiving + Purchasing		600
Parking		
Total (1,255 surface + 637 below ground)	1,892	
Alternative A Total Square Footage (main level including pool deck)		251,720
Alternative A Total Square Footage (main level and high-rise)		377,280
Source: Bergman, Walls, and Associates, 2009; AES, 2010.		

3.0 REVIEW OF ENVIRONMENTAL SETTING & IMPACT ANALYSIS

Section 3 of this SIR provides (1) a summary of the environmental and regulatory setting for the Barstow Site as described in the FEIS, (2) a summary of environmental impacts and mitigation identified in the FEIS for Alternative A, (3) a discussion of changes to the environmental and regulatory settings since publication of the FEIS for the Barstow Site, and (4) an analysis of any changes to environmental impacts from Alternative A as a result of the changes to the environmental and regulatory setting, and whether these changes affect conclusions regarding environmental impacts within the FEIS for Alternative A and the recommended mitigation for Alternative A.

3.1 LAND RESOURCES

Final EIS Setting

As described in Section 3.1.2 of the FEIS, the Barstow Site is located in San Bernardino County and the Mojave Desert Geomorphic Province. Elevations on the Barstow Site range from approximately 2,392 to 2,413 feet above mean sea level. Expansive and corrosive soils are not found at the Barstow Site, and the soil is mostly comprised of sand, which has a low shrink-swell potential.

The nearest seismic hazard is the Lenwood-Lockhart Fault, located approximately 1 mile east of the Barstow Site. While the Lenwood Fault is on the California Department of Conservation's list of Alquist-Priolo Fault Zones, the Barstow Site is located greater than 500 feet from the fault, and therefore is not considered to be within an Alquist-Priolo Fault Zone. The Modified Mercalli Intensity Scale score for the Barstow Site is VIII, which indicates there could be some damage to the buildings in the vicinity should an earthquake occur (Association of Bay Area Governments [ABAG], 2022). The depth of groundwater in the vicinity of the Barstow Site averages 230 feet below ground level. There is no substantial risk of liquefaction or lateral spreading in the project area. Identified mineral resources are located near the Mojave River Corridor and I-40 (approximately 7 miles northeast of the Barstow Site). However, no mineral resources occur at the Barstow Site.

Final EIS Impacts and Mitigation Measures

Impacts associated with topography and landslides, soils, seismic hazards, and mineral resources for the Barstow Site are described in Section 4.1.1, Land Resources, of the FEIS. As stated therein, because the Barstow Site is relatively flat, development of the Barstow Site would have no adverse effects on topographic characteristics. Regarding soil erosion and stormwater runoff, due to the relatively flat topography and implementation of erosion control measures and regulatory requirements presented in Chapter 2.0, Sections 5.1 and 5.2 of the FEIS, and the MSA in Appendix D of the Draft EIS, adverse effects would be reduced to insignificant levels. Regarding seismic hazards, because the Barstow Site is located within a seismically active region, the casino and related facilities would be constructed in accordance with the provisions of the International Building Code guidelines and used and developed in a manner consistent with the Barstow Municipal Code (refer to Chapter 5.1 of the FEIS and Section 2.0 of the MSA). Therefore, development of the Barstow Site would have no adverse effects related to seismic hazards.

No adverse effects were identified due to expansive soils, soil corrosivity, liquefaction, lateral spreading, seismically induced flooding, or mineral resources.

Changes to the Environmental and Regulatory Setting

Since publication of the FEIS, the conditions on the Barstow Site have remained substantially unchanged. References provided in the FEIS have been confirmed and updated, as needed. Expansive and corrosive soils are not found on the Barstow Site and the soil is mostly comprised of sand (Natural Resources Conservation Service, 2022). As stated in the FEIS, the nearest seismic hazard is the Lenwood-Lockhart Fault, located approximately 1 mile east of the Barstow Site (USGS, 2017). The Modified Mercalli Intensity Scale score for the Barstow Site is VIII (ABAG, 2019)). As stated in the FEIS, the Barstow Site is not subject to liquefaction or lateral spreading. The Barstow Site conditions are expected to remain unchanged with regard to liquefaction or lateral spreading. No mineral resources occur on the Barstow Site (City, 2020). No updates have been identified or recommended for the MSA provisions in Appendix D of the Draft EIS/EIR (which requires compliance with City ordinances) or the BMPs presented in Chapter 5 of the FEIS.

Findings

Based on the information presented above, no changes have been identified for the environmental or regulatory settings, with the exception of the MSA, which was amended in 2020 and shown in **Attachment A**.

The FEIS determined that with the incorporation of the MSA provisions presented in Appendix D of the Draft EIS/EIR, and regulatory requirements and BMPs presented in Sections 5.1 and 5.2 of the FEIS, development of Alternative A would result in minimal adverse effects to land use resources. The amendments to the MSA executed in 2020 were minor clarifications and do not alter these determinations. Therefore, no additional impacts associated with land resources beyond those identified in the FEIS would occur and no additional mitigation would be warranted.

3.2 WATER RESOURCES

Final EIS Setting

Surface water, drainage, floodplain, surface water quality, groundwater supply, and groundwater quality for Alternative A (Barstow Site), were described in Section 3.2, Water Resources, of the FEIS and are summarized below.

Surface Water, Drainage, Floodplain

The Barstow Site is located within the South Lahontan Basin, Mojave River watershed, Middle Mojave hydrological unit. Precipitation rates in the Barstow Area average approximately 4.4 inches per year.

Stormwater runoff from the Barstow Site is sheet flow to the northwest, where stormwater discharges to the Lenwood Wash, an off-site concrete drainage ditch along Lenwood Road. Approximately 10.5 acres of the southwest portion of the Barstow Site is located within the Mojave River 100-year floodplain and is designated Zone A0. The remaining portion of the Barstow Site is designated Zone X and is located outside of the 500-year floodplain.

Regarding surface water quality, the Barstow Site is under the jurisdiction of the Lahontan Regional Water Quality Control Board (LRWQCB). No water bodies associated with the Barstow Site were identified as impaired based on the 2006 update of the 303(d) list. Beneficial uses of the Mojave River identified in the LRWQCB Basin Plan include: groundwater recharge, municipal and domestic supply, agricultural supply, cold freshwater habitat, commercial and sport fishing, contact and non-contact water recreation, warm freshwater habitat, and wildlife habitat. In addition, the LRWQCB Basin Plan identifies water quality objectives to sustain the long-term prevalence of beneficial uses of Mojave River water of 445 milligrams per liter (mg/L) total dissolved solids (TDS) and 6 mg/L nitrate. Stormwater generated on the Barstow Site is not expected to contain high levels of contaminants.

Groundwater

The Barstow Site is located within the Middle Mojave River Valley Groundwater Basin, part of the larger Mojave River Valley Groundwater Basin. Water in the Basin is supplied by the Floodplain Aquifer and Regional Aquifer. A monitoring well located on the adjacent property north of the Barstow Site identified an average groundwater elevation of 230.7 feet below ground surface. Wells in this aquifer yield between 100 to 4,000 gallons per minute (gpm) and the average well yield is approximately 480 gpm. Natural recharge in the Basin typically occurs from direct precipitation, ephemeral stream flow, infrequent surface flow of the Mojave River, and underflow of the Mojave River into the basin from the southwest. Residents overlying the Basin rely almost entirely on groundwater for their water supply.

The Mojave Basin is in overdraft conditions. In 2000, this resulted in a deficit of 41,800 acre-feet (af). To mitigate the effects of overdraft, the Mojave Water Agency (MWA) is using imported State Water Project (SWP) for artificial recharge. The MWA contracts with the SWP for a total annual entitlement of 75,800 af. The Barstow Site is located within the Centro Subarea of the Mojave River watershed. The Centro Subarea is the only subarea in the Mojave River watershed that has experienced a surplus in the water budget (1,200 af in 2004).

Groundwater quality objectives for the Mojave River at Barstow are presented in the 2005 LRWQCB Basin Plan and Table 3.2-2 of the FEIS. Degradation of groundwater quality has been caused by several constituents of concern, including TDS. As summarized in Section 3.2.1, page 3.2-7 of the FEIS, through an aggressive source control program, the City has reduced the concentration of TDS from 1,000 mg/L to less than 800 mg/L.

Final EIS Impacts and Mitigation Measures

Impacts of the Barstow Site (Alternative A) on surface water (drainage and flooding), surface water quality, groundwater supply, and groundwater quality were analyzed in Section 4.2, Water Resources, of the FEIS and are summarized below.

Drainage and Flooding

Implementation of Alternative A would alter the existing drainage pattern of the Barstow Site and increase stormwater runoff as a result of increased impervious surface, which would result in an increase in stormwater runoff over pre-development conditions. Because a drainage plan has been incorporated into the project design that includes drainage facilities to detain the increase in runoff onsite, this would maintain the pre-development runoff rate to the Lenwood wash and would avoid adverse effects associated with stormwater runoff.

The western 10.5 acres of the Barstow Site are within the 100-year floodplain. This area encompasses parking areas, access roads, and stormwater retention facilities. Although flooding in these areas would reduce access to the Barstow Site, development of Alternative A would not impede the floodway nor result in flood risks to proposed structures. Furthermore, because fill would not be imported to the Barstow Site, floodplain elevations would not increase. Therefore, adverse impacts to the floodplain would be minimized.

Water Quality (Construction and Operation)

Construction of Alternative A would result in ground disturbance, which could lead to erosion and sediment discharge to surface waters during storm events. Construction also has the potential to generate waste materials that can become entrained in surface flow and washed into nearby surface waters during storm events. Potential discharges of pollutants to surface waters from construction wastes and fuel spills and leaks would adversely impact off-site drainages. During construction, erosion control measures shall be employed in compliance with the Phase I NPDES Construction General Permit for construction. A Stormwater Pollution Prevention Plan (SWPPP) shall be developed prior to any ground disturbance at the Barstow Site and shall include practices to reduce potential surface water contamination during storm events. Implementation of the BMPs incorporated into the SWPPP would ensure no adverse impacts to surface water resources occur from construction of Alternative A.

Operation of Alternative A could result in off-site discharge of stormwater runoff contaminated with automobile contaminants, debris from patrons, and dissolved solids from landscaping. Therefore, the drainage plan incorporated into the project description includes infiltration and oil/water separators to improve stormwater quality prior to retention. Stormwater would traverse through a series of infiltration areas and basins before entering a detention basin located along the western border of the Barstow Site. Stormwater would then be discharged to the Lenwood Wash at pre-existing rates. Therefore, Alternative A would not result in significant adverse effects to water quality. Overall, project design and recommended BMPs would further reduce the potential for adverse effects to water quality.

Groundwater (Supply and Quality)

Potable water would be supplied by the available capacity of the Golden State Water Company. Therefore, development of Alternative A would not require the use of on-site groundwater resources. A drainage plan has been incorporated into project design that would allow percolation into the soil while ensuring that the additional stormwater generated from the introduction of impervious surfaces would be detained on-site so that groundwater recharge rates would not be affected. No adverse effects would occur to the groundwater supply.

Site runoff could impact groundwater quality if contaminants entrained in the stormwater percolate to the groundwater table. With a depth to groundwater of over 230 feet, the stormwater that would have already been filtered through filter strips, landscaped areas, and infiltration areas would be adequately filtered prior to reaching groundwater. By the time stormwater reaches the groundwater table, it would be of similar quality to pre-existing conditions. Alternative A would not result in significant adverse effects to groundwater quality. Overall project design and recommended BMPs would ensure adverse effects to groundwater quality would not occur.

Mitigation Measures

Mitigation measures for Alternatives A through D are described in Section 5.2, Water Resources, of the FEIS and are presented below.

Regulatory Requirements

In accordance with Section 402 of the Clean Water Act, the Tribe would file a Notice of Intent for coverage under the Phase II NPDES General Permit for Stormwater Discharges Associated with Construction Activities (General Permit) with the U.S. Environmental Protection Agency (USEPA). Accordingly, a SWPPP would be developed prior to any ground disturbance at the Barstow Site and shall include practices to reduce potential surface water contamination during storm events. The SWPPP would outline site-specific BMPs designed to comply with the water quality and soil erosion provisions of the General Permit.

SWPPP BMPs

The purpose of the following BMPs is to minimize or eliminate pollution of stormwater from construction-related sources; some BMPs apply to several pollution sources. The BMPs included within the site-specific SWPPP shall include, but are not limited to, the following:

- Major grading activities shall be scheduled during the dry season.
- Erosion control blankets or jute netting shall be placed in rough graded ditches and then hydro-seeded.
- Fiber rolls and straw wattles shall be installed throughout the construction site around the down-slope perimeter of the construction site.
- Hay or straw mulch and tackifier shall be used as temporary measure for stabilizing disturbed areas.
- Landscaping shall be managed to minimize erosion and sedimentation according to the following practices:
 - Rock filter berms shall be placed across roadways.
 - Sediment basins shall be installed throughout the Barstow Site and shall be removed during the final phase of construction.
 - Silt fencing shall be placed down-slope of exposed soil areas and around temporary soil stockpiles.
 - Sacked rock filters shall be placed around new curbs and drainage inlets around the Barstow Site until the soils are stabilized with permanent landscaping.
- Catch basins, junction boxes, culverts, and outfall structures/energy dissipaters shall be used throughout the grading plan.
- Detention basins shall be constructed to provide for sediment settling.
- Ingress/egress points to the Barstow Site shall be stabilized and graded.
- A wash station shall be erected at the egress point of the Barstow Site if dirt and mud tracking from the site is anticipated.
- Cleaning, fueling, maintenance, and repair of construction vehicles and equipment shall be performed off-site whenever possible.
- The Contractor shall be responsible for all maintenance, inspection, and repair to all erosion and sediment control measures throughout the construction period and shall ensure that all other protective devices are maintained and repaired in good and effective condition.

Changes to the Environmental and Regulatory Setting

Stormwater Quality

The Resource Conservation and Open Space Element in the City’s General Plan includes the following policy to ensure stormwater quality (City, 2015a):

The developer will be required to comply with the latest edition of the California Construction General Permit. This permit includes the preparation of an Erosion Control Plan and Storm Water Pollution Prevention Plan, submittal of a Notice of Intent application, and payment of required fees submitted on the Storm Water Multiple Application and Report Tracking System online tool. Upon receipt of a Waste Discharge Identification Number by the State Water Board, and approval of plans by the requisite City departments, developers may obtain grading or other permits to begin land disturbance activities.

Although state and local regulations generally do not apply to trust land, the Tribe has agreed in Section 2 of the MSA to develop the Project consistent with the City’s Municipal Code. This includes regulations related to water quality enacted to meet the General Plan goals and policies.

Additionally, as discussed in Section 5.2 of the FEIS, the Project would comply with the most current U.S. Environmental Protection Agency (USEPA) General Permit for Stormwater Discharges Associated with Construction Activities (General Permit). Accordingly, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared to USEPA standards.

The City would require the developer to comply with City of Barstow Development Standards that incorporate site design with approved Low Impact Development Standards. The developer would prepare, as part of plan submittal, a Water Quality Management Plan (WQMP) for Alternative A as dictated by City development standards in effect at the time of development. Upon approval of the WQMP, Alternative A's Legally Responsible Owner (Land Owner/Development Owner) must sign and record the necessary documents attached to the WQMP.

The City requires developers to provide an Erosion Control Plan for all new projects of any size. Plans must include construction waste disposal and recycling measures. New projects that are subject to the Construction General Permit must provide an Erosion Control Plan, prepared in accordance to the Construction General Permit as part of plan submittal and review. Erosion Control Plans shall include construction waste disposal and recycling measures.

The developer must agree to provide access to the City-appointed Qualified SWPPP Developer (QSD) or Qualified SWPPP Practitioner (QSP) to the Barstow Site and its surrounding areas during normal construction hours and activities. The City-appointed QSD or QSP shall conduct a city designed BMP inspection without notice or scheduled arrival.

Groundwater

The following are updates to State regulations regarding the management of groundwater:

Senate Bill (SB) 1938, Assembly Bill (AB) 359, and provisions of SB X7-6 and AB 1152 establish specific procedures on how Groundwater Management Plans (GWMP) are to be developed and adopted by local agencies. They define the required and voluntary technical components that must be part of a GWMP and California Statewide Groundwater Elevation Monitoring (CASGEM) program. AB 359, introduced in 2011, made changes to the California Water Code that requires local agencies to provide a copy of their GWMP to the California Department of Water Resources (DWR) and requires DWR to provide public access to those plans (DWR, 2015).

The Sustainable Groundwater Management Act (passed in 2014) is a three-bill legislative package that includes the provisions of SB 1168 (Pavley), AB 1739 (Dickinson), and SB 1319 (Pavley).

The Act mandates the formation of locally controlled groundwater sustainability agencies in high-and medium-priority groundwater basins, with the goal of sustainably managing local groundwater resources (DWR, 2015).

Development of the Project would not occur until after the Barstow Site is taken into trust. In general, state and local regulations do not apply to lands held in trust. Following acquisition in trust, the Barstow Site would not be subject to state or local requirements, with limited exception, such as the compliance with City ordinances included in Section 2 of the MSA and Section 5.2 of the FEIS.

California's Groundwater Update 2013 report was prepared by the DWR for the South Lahontan Hydrologic Region, which includes the Middle Mojave River Valley Groundwater Basin (DWR, 2015). The groundwater data presented in the 2013 report will be used to update Bulletin 118 (discussed in the FEIS). As stated in the FEIS, the groundwater basins with the greatest extraction include the Upper, Middle, and Lower Mojave River Valley groundwater basins. Because of heavy groundwater use and declining groundwater levels, groundwater in the Mojave Groundwater Basin area was adjudicated in 1996. MWA is the appointed watermaster to ensure that groundwater extraction in the Mojave Groundwater Basin area follows the terms of the adjudication (DWR, 2015).

As part of California's 2009 Comprehensive Water Package legislation (SB X7-6), DWR implemented the CASGEM Program, which established provisions and requirements for local agencies to develop and conduct groundwater-level monitoring programs. The legislation requires DWR to identify the current extent of groundwater elevation monitoring within each of the alluvial groundwater basins defined under Bulletin 118 and to prioritize those basins, so as to help identify, evaluate, and determine the need for additional groundwater-level monitoring.

Using groundwater reliance as the leading indicator of basin priority, DWR evaluated groundwater basins and categorized them into four prioritization groups: high, medium, low, and very low. The Middle Mojave River Valley is categorized as a low-priority basin (DWR, 2015).

The following is additional information related to the groundwater supply discussion provided in the FEIS regarding water and groundwater demand in the South Lahontan region. Water demands in the South Lahontan region are met through a combination of supplies from the SWP, imported surface water, local groundwater, and recycled water supplies. The 2005-2010 average annual total water supply for the region is estimated at 668 thousand acre-feet (taf), which includes approximately 79 taf of reuse water. Groundwater contributes approximately 441 taf (66%) toward the total water supply, with the remaining supply met by the SWP, local supplies, and recycled water. Groundwater extraction in the South Lahontan region accounts for about 3% of California's 2005-2010 average annual groundwater use; nonetheless, groundwater provides 100% of the water supply for some communities in the region and is an important resource to help facilitate conjunctive management in the region (DWR, 2015). Since publication of the FEIS, the MWA secured an additional entitlement of 14,000 af from the SWP in 2009. The MWA updated their Strategic Plan in 2021 to refine their focus in recognition of the changing landscape within which the MWA operates and the increased uncertainty affecting future planning. The Strategic Plan serves to achieve the goals and objectives of the MWA by implementing priority initiatives such as: manage groundwater basins sustainably, identify and maintain access to imported water supplies, provide reliable water supplies, achieve urban water use efficiency (MWA, 2021a).

Regarding water management, the Integrated Regional Water Management Plans (IRWM) improves water management and involves multiple agencies, stakeholders, individuals, and groups. The methods used in IRWM planning include the development of water management strategies that relate to water supply, water quality, water-use efficiency, operational flexibility, stewardship of land and natural resources, and groundwater resources. Statewide, the majority of IRWM plans address groundwater management in the form of goals, objectives, and strategies. The Barstow Site is located in the planning area of the MWA Regional Water Management Plan (DWR, 2015).

Regarding water supply, the 2020 Urban Water Management Plan (UWMP) was prepared by MWA to ensure reliable water supplies through the 2065 planning horizon. To address current overdraft conditions in the Mojave River Groundwater Basin, the MWA contract with the SWP allows an annual allotment of 89,800 af (MWA, 2021b).

A 2020 UWMP was prepared for the Barstow Service Area by the Golden State Water Company (GSWC) to demonstrate water supply reliability in a normal year, single dry year, and droughts lasting at least five years over a twenty-year planning horizon (through 2045). As concluded in the 2020 UWMP, based on GSWC Barstow's water supply portfolio, GSWC's active management of its water supply portfolio, and GSWC's Water Storage Contingency Plan, stable and reliable water services will be available to meet its current and 2045 projected water demands. This supply reliability encompasses normal, single dry, and five consecutive dry year scenarios (GSWC, 2021).

As discussed above, development of the Project would not occur until after the Barstow Site is taken into trust. In general, state and local regulations do not apply to lands held in trust. Following acquisition in trust, the Barstow Site would not be subject to state or local requirements, with limited exception, such as the compliance with City ordinances included in Section 2 of the MSA and Section 5.2 of the FEIS. As indicated on Table 3-18 of the 2020 UWMP, concentrations of TDS average between 618 and 711 mg/L within the Central Region of the Mojave River Groundwater Basin (MWA, 2021b), which is less than concentration levels referenced in the Final EIS. The extensive groundwater monitoring network and plans and policies that address groundwater quality will ensure that groundwater quality continues to improve.

Precipitation

The average rainfall increased slightly from 4.4 inches per year to 4.64 inches per year (City, 2022a).

Lahontan Basin Plan

The current Lahontan Basin Plan includes amendments effective through September 22, 2021 (Amendments 8 through 19). Amendment 18 modifies the beneficial uses for the Mojave River and its tributaries and other minor revisions. Amendment 19 adds definitions for three new beneficial uses: Tribal Traditional Culture, Tribal Subsistence Fishing, and Subsistence Fishing. Surface water quality objectives remain unchanged (LRWQCB, 2021).

Section 303(d) List

Based on review of the 2020-2022 Clean Water Act Section 303(d) List, no water bodies associated with the Barstow Site (Mojave River watershed, Middle Mojave hydrologic unit) were identified as impaired (State Water Resources Control Board [SWRCB], 2022a).

Floodplain and Surface Waters

The existing Federal Emergency Management Agency (FEMA) floodplain designations of the Barstow Site remain unchanged (FEMA, 2008). An updated site visit was completed on April 5, 2023 and confirmed that, as described in the FEIS, surface waters are not present on the Barstow Site.

Findings

No changes identified above regarding new and/or updated regulations and water management plans that have occurred since publication of the FEIS would alter the conclusions presented in Section 4.2.1 of the FEIS. Conditions regarding the presence of surface water resources, groundwater quality, and drainage patterns are unchanged from the FEIS. Regarding groundwater, the DWR identified the Middle Mojave River Valley Groundwater Basin as low-priority for additional groundwater-level monitoring and additional water entitlement from the SWP was secured by the MWA. In addition, policies and procedures identified in the Strategic Plan, Integrated Regional Water Management Plans, and UWMPs would ensure that adequate water supply is available to meet existing and projected water demand, including Alternative A, since it is identified in the City's General Plan as a likely development (see **Section 3.8**, Land Use).

Therefore, with the incorporation of the BMPs presented above and in Section 5.2 of the FEIS and Appendix D of the Draft EIS/EIR, as well as compliance with current City ordinance and review procedures, including those related to water quality and groundwater per Section 2 of the MSA, and available water supply, no additional impacts associated with water resources beyond those identified in the FEIS would occur and no additional mitigation would be warranted. Refer also to **Section 3.9** for additional discussion of water supply.

3.3 AIR QUALITY

Final EIS Setting

As described in Section 3.3.2 of the FEIS, the Barstow Site is located in the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The MDAQMD has jurisdiction governing air quality in the MDAB under the delegation and oversight of the California Air Resources Board and the USEPA; however, once the Barstow Site is taken into trust, the USEPA would have sole jurisdiction governing air quality on tribal land.

As shown in Table 3.3-2 of the FEIS, the MDAB has been designated as severe-17 nonattainment for ozone (O₃) and moderate nonattainment for particulate matter 10 micrometers or less in size (PM₁₀). Accordingly, the *de minimis* threshold for O₃ precursors (reactive organic gas [ROG] and nitrogen oxide [NOX]) is 25 tons per year (tpy), and the *de minimis* threshold for PM₁₀ is 100 tpy. The MDAB meets the federal standards or is unclassifiable for all other pollutants.

As described in Section 3.3 of the FEIS, the Council on Environmental Quality (CEQ) provided its Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions (NEPA Guidance) on February 10, 2010. The NEPA Guidance provides practical tools for agency reporting, including a presumptive threshold of 25,000 metric tons (MT) of direct carbon dioxide equivalent emissions (CO₂e) from the proposed action to trigger a quantitative analysis, and instructs agencies how to assess the effects of climate change on the proposed action and its design. The NEPA Guidance recommends quantification of greenhouse gas emissions (GHG) emissions, assessment of the significance of any impact on climate change, and identification of mitigation or alternatives that would reduce GHG emissions.

Final EIS Impacts and Mitigation Measures

Impacts associated with air quality for the Barstow Site are described in Section 4.3 of the FEIS. As stated therein, because Alternative A emits pollutants, is not exempt from conformity, and is located within a nonattainment area for O₃ and PM₁₀, the estimated emissions must be compared to the *de minimis* thresholds pursuant to the Clean Air Act General Conformity Rule (40 CFR § 93.153 [b][1] and [2]). Tables 4.3-2 and 4.3-3 within the FEIS compared construction and operational emissions, respectively, to the applicable conformity thresholds. Construction emissions were found to not exceed *de minimis* levels; however, operational emissions were found to exceed *de minimis* levels for ROG and NO_x; therefore, a conformity determination is needed to demonstrate that Alternative A conforms to the approved State implementation plan. A conformity determination for Alternative A is ongoing (refer to Appendix P of the FEIS/TEIR).

It is anticipated that conformity would be shown through the purchase of offset emission credits; therefore, mitigation was required in Section 5.3 of the FEIS that would reduce operational emissions and require the purchase of off-set emission credits so that there would be no net increase in NO_x or ROG emissions and federal general conformity requirements would be met. Therefore, after mitigation, Alternative A would not result in significant adverse effects to local or regional air quality.

Impacts associated with climate change for the Barstow Site are described in Section 4.13 of the FEIS. As shown in Table 4.13-5 of the FEIS, GHG emissions resulting from Alternative A were estimated to be 38,949 MT per year of CO₂e. Direct and indirect CO₂e emissions would be above the CEQ's 25,000 MT per year of CO₂e reporting standard. Additionally, as shown in Table 4.13-6 of the FEIS, Alternative A would not comply with all three applicable State climate change strategies. Therefore, this was a potentially significant cumulative effect and mitigation was recommended in Section 5.3 of the FEIS, which would reduce the potential for adverse cumulative effects associated with climate change.

Changes to the Environmental and Regulatory Setting

Since publication of the FEIS, conditions on the Barstow Site remain substantially unchanged. The MDAB has remained as severe nonattainment for O₃ and moderate nonattainment for PM₁₀. Accordingly, the *de minimis* thresholds used in the FEIS have remained the same and no additional analysis is needed. Since publication of the FEIS, the CEQ has provided updated guidance on the consideration of GHG emissions and the effects of climate change in NEPA reviews. The updated CEQ guidance directs agencies to consider all available tools and resources in assessing GHG emissions and climate change effects of their proposed actions, and states that federal agencies should quantify direct and indirect emissions of the project alternatives with the level of effort being proportionate to the scale of the emissions relevant to the NEPA review (88 FR 1196, Docket Number CEQ-2022-0005; CEQ, 2023). Accordingly, the FEIS analysis of climate change impacts included quantification and consideration of appropriate mitigation measures consistent with the updated CEQ guidance. No updates have been identified or recommended for the MSA provisions in Appendix D of the Draft EIS/EIR (which requires compliance with City ordinances) or the BMPs presented in Chapter 5 of the FEIS.

Findings

Based on the information presented above, no changes have been identified for the environmental or regulatory setting. The FEIS determined that with the incorporation of the MSA provisions presented in Appendix D of the Draft EIS/EIR and the regulatory requirements and BMPs presented in Section 5.3 of the FEIS, development of Alternative A would result in minimal direct, indirect, and cumulatively considerable adverse effects to land use resources. Therefore, no additional impacts associated with land use beyond those identified in the EIS would occur and no additional mitigation would be warranted.

3.4 BIOLOGICAL RESOURCES

Final EIS Biological Setting

The biological setting for the Barstow Site is addressed in Section 3.4 of the FEIS. At the time of the FEIS, the Barstow Site consisted of Mojave creosote bush scrub and ruderal/developed habitat. The Barstow Site did not include any designated critical habitat. No potentially jurisdictional wetlands or other waters of the U.S. occurred on the Barstow Site. The Barstow Site contained suitable habitat for six State special-status species and one federally listed species:

Barstow woolly sunflower (*Eriophyllum mohavense*), creamy blazing star (*Mentzelia tridentata*), Mojave monkeyflower (*Mimulus mohavensis*), western burrowing owl (*Athene cunicularia*), Le Conte's Thrasher (*Toxostoma lecontei*), Mojave ground squirrel (*Spermophilus mohavensis*), and desert tortoise (*Gopherus agassizii*). The desert tortoise is the only federally protected species, and is listed as threatened. This species was ruled unlikely to occur within the Barstow Site. Barstow woolly sunflower, creamy blazing star, and Mojave monkeyflower were surveyed for during their bloom periods and were not observed. Western burrowing owl, Le Conte's Thrasher, and Mojave ground squirrel were not observed during site surveys.

Final EIS Impacts and Mitigation Measures

The FEIS concluded that with incorporation of mitigation measures (Section 5.4), development of Alternative A would not adversely affect 1) sensitive habitat or waters of the U.S., or 2) State and federally listed plant and animal species. The Barstow Site does not contain designated critical habitat, wetlands, or waters of the U.S. Thus, development of Alternative A would have no adverse effects to critical, sensitive, or otherwise protected habitat.

The mitigation measures for nesting birds presented in Section 5.4 of the FEIS would provide protection to State-listed birds during the nesting season, and further reduce potential adverse effects to western burrowing owl and Le Conte's Thrasher. Development of Alternative A would not result in adverse effects to western burrowing owl or Le Conte's Thrasher.

The mitigation measures presented in Section 5.4 of the FEIS would also avoid or minimize any potential adverse effects to desert tortoise and Mojave ground squirrel. A biological assessment was prepared for the Barstow Site; and the U.S. Fish & Wildlife Service (USFWS) concurred that Alternative A is not likely to adversely affect the desert tortoise with the implementation of mitigation measures specified in Section 5.4.

Changes to the Environmental and Regulatory Setting

On April 5, 2023, an updated biological survey was conducted on the Barstow Site to identify on-site conditions, including habitats, surface water resources, and plant and animal species. The purpose of the survey was to identify changes to the environmental setting since preparation of the FEIS. The field visit consisted of a pedestrian survey, and the entirety of the Barstow Site was surveyed. The Barstow Site was mostly undeveloped, except for unpaved intersecting roadways throughout the site and a stone pillar along the northern site boundary. The on-site habitat consisted of Mojave creosote bush scrub and ruderal land. Debris was present and sparsely distributed throughout the Barstow Site. Small burrows were observed on site. Based on site topography, the Barstow Site appears to drain towards the southwest portion of the property, where loose and sandy topsoil had been washed off from recent rainfall. Small animal burrows were more prevalent within these washes than elsewhere on site. An off-site roadside ditch parallels Lenwood Road and, along the Barstow Site, is partially paved/culverted, partially lined with riprap, and partially bare ground. Changes on the Barstow Site since preparation of the FEIS are minor and limited to seasonal changes such as washing of loose soils immediately following a heavy rain event, and minor shifting of unpaved roadways due to fluctuations in use.

Changes in the regulatory environment pertain to listed species. An updated federal species list now includes Monarch butterfly (*Danaus plexippus*), a federal candidate for listing (USFWS, 2022a). Updated queries from the California Natural Diversity Database (CNDDDB) and California Native Plant Society (CNPS) now include five CNPS-ranked plants: Mojave spineflower (*Chorizanthe spinosa*), Joshua Tree poppy (*Eschscholzia androuxii*), slender nemacladus (*Nemacladus gracilis*), Mojave menodora (*Menodora, spinescens var. mohavensis*), and Mojave indigo-bush (*Psorothamnus arborescens var. arborescens*) (CDFW, 2022a; CNPS, 2022). The listing status for each species is summarized in **Table 2**.

TABLE 2. LISTING STATUS FOR 2022 SPECIAL-STATUS SPECIES

Species	Listing Status
Monarch butterfly (<i>Danaus plexippus</i>)	Federal Candidate
Mojave spineflower (<i>Chorizanthe spinosa</i>)	CNPS 4.2
Joshua Tree poppy (<i>Eschscholzia androuxii</i>)	CNPS 4.3
Slender nemacladus (<i>Nemacladus gracilis</i>)	CNPS 4.3
Mojave menodora (<i>Menodora, spinescens var. mohavensis</i>)	CNPS 1B.2
Mojave indigo-bush (<i>Psorothamnus arborescens var. arborescens</i>)	CNPS 4.3
CNPS: California Native Plant Society (California Rare Plant Rank [CRPR])	
1A Plants Presumed Extinct in California	
1B Plants Rare, Threatened, or Endangered in California and Elsewhere	
2B Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere	
3 Plants About Which We Need More Information – A Review List	
4 Plants of Limited Distribution – A Watch List	
CNPS Threat Ranks:	
0.1 Seriously Threatened in California (Over 80% of occurrences threatened/high degree and immediacy of threat)	
0.2 Fairly Threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)	
0.3 Not Very Threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)	

Based on a field survey and desktop review, habitat types on the Barstow Site remain as Mojave creosote bush scrub and ruderal/developed (refer to Section 3.4 of the FEIS). No wetlands or waters of the U.S. occur onsite (USFWS, 2022b).

Findings

As site conditions remain effectively unchanged since preparation of the FIES, no additional impacts to migratory birds or desert tortoise would occur when compared to the FEIS. Therefore, impacts identified within Section 4.4 of the FEIS and the mitigation measures in Section 5.4 of the FEIS remain sufficient.

At the time of the FEIS, Monarch butterfly had not been listed as a federal candidate species. Monarch butterflies are obligates to milkweed, their host plant. Females lay eggs on milkweed, and larvae feed on the plant. Overwintering monarchs require sites with sufficient roosts for the population (such as eucalyptus trees) that provide appropriate sunlight and shelter from the wind. Appendix T of the FEIS includes a biological assessment, which details the flora observed in Appendix 4. Milkweed was not listed as observed. An updated biological survey conducted in April 2023 confirmed absence of milkweed on site. Additionally, the Barstow Site has no suitable roosts to support an overwintering population. Thus, Monarch butterfly is unlikely to occur on site and no additional impacts would occur in regard to monarch butterfly.

Since publication of the FEIS, the CNPS has updated its rare plant inventory, resulting in one plant listed 1B.2 (Mojave menodora) and four list 4.2 or 4.3 plants (Mojave spineflower, Joshua Tree poppy, slender nemacladus, Mojave menodora, and Mojave indigo-bush). The Barstow Site has suitable habitat to potentially support Mojave spineflower, Joshua Tree poppy, and Mojave indigo-bush as the site contains suitable desert scrub, flats, and sandy soils to potentially support these species. However, there were no CNDDDB occurrences within a 5-mile radius of the Barstow Site for the three aforementioned species (CDFW, 2022b). The Barstow Site does not contain suitable habitat to support slender nemacladus and Mojave menodora. Slender nemacladus is generally found in cismontane woodland and valley and foothill grassland. A CNDDDB search within a 5-mile radius of the Barstow Site did not yield any occurrences for slender nemacladus (CDFW, 2022b). Mojave menodora is found in Mojavean desert scrub generally on gravel, rocky hillsides, and in canyons. One occurrence (occ. 10) from 2011 is documented approximately 3.75 miles to the east of the Barstow Site (CDFW, 2022b). The Barstow Site lacks appropriate rocky/gravelly soils to support this species.

In general, species protected at the state or local level are not afforded specific protection on trust land. However, there are no known observations of these newly listed plant species within 5 miles of the Barstow Site, and these species were not observed during the site visit. Additionally, those newly-listed plant species with the potential to occur within the Barstow Site are ranked by CNPS as List 4.2 or 4.3 (not threatened or endangered). The only newly identified plant with the potential to be considered state threatened or endangered (Mojave menodora, listed as 1B.2) does not have the proper habitat to be present within the Barstow Site. Therefore, the conclusions in the FEIS remain sufficient and no additional mitigation measures are necessary.

3.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

The cultural setting for the Barstow Site is included in Section 3.5 of the FEIS and will not be repeated here. Efforts for the Draft and FEIS included: a background record search with the San Bernardino

Information Center, which found that no cultural resources had been identified within the Barstow Site; a record search completed by the Native American Heritage Commission (NAHC) and subsequent outreach to groups and individuals identified by the NAHC; an archaeological field survey of the Barstow Site; and a review of the University of California Museum of Paleontology online database. None of these efforts uncovered any cultural or paleontological resources on the Barstow Site.

Final EIS Impacts and Mitigation Measures

The FEIS concluded that incorporation of the mitigation measures included in Section 5.5 (FEIS) would minimize adverse effects to any cultural or paleontological resources found during construction.

Changes to the Environmental and Regulatory Setting

No new cultural resource studies were performed for this SIR as there have been no changes in the regulatory environment, no changes to land use, no construction, and no activities on the Barstow Site that could potentially uncover resources since the original study was prepared.

Findings

Based on the information presented above, no changes have been identified for the environmental or regulatory settings. The FEIS determined that with the incorporation of the mitigation measures presented in Section 5.5 of the FEIS, development of Alternative A would result in minimal adverse effects to cultural resources. Therefore, no additional impacts associated with cultural resources beyond those identified in the FEIS would occur and no additional mitigation would be warranted.

3.6 SOCIOECONOMIC CONDITIONS AND ENVIRONMENTAL JUSTICE

Final EIS Setting

Section 3.6.1, Socioeconomic Conditions and Environmental Justice, of the FEIS compared population, housing, employment, and income data for California, San Bernardino County, and the City of Barstow for 2000, 2005, and 2010. This section also presented information about property taxes for the Barstow Site, crimes reported in 2005 for the City and California, and schools in the project area.

Section 3.6.4, Environmental Justice, of the FEIS, identified the affected environment where a minority or low-income population could be disproportionately affected by development of the Barstow Site. This section also looked at the diversion of revenue from competing gaming facilities.

Population

As shown in Table 3.6-1 (Barstow Site Regional Population) of the FEIS, as of January 2010, the population of the State of California was approximately 38,648,090; the San Bernardino County population was approximately 2,073,149; and the population of the City of Barstow was 24,281 people (or 1.2% of the County's total population). Overall, between 2000 and 2010, the State experienced approximately 14% growth, San Bernardino County experienced approximately 21% growth, and the City of Barstow experienced 15% growth.

Housing

As shown in Table 3.6-2 (Barstow Site Regional Housing) of the FEIS, the State of California was estimated,

in January 2010, to have approximately 13,591,866 housing units, of which approximately 5.9% were vacant. San Bernardino County had an estimated 693,712 units, of which approximately 11.58% were vacant. Barstow had an estimated 10,160 units, of which approximately 17.10% were vacant.

Employment

As shown in Table 3.6-3 (Barstow Site Regional Labor Force Estimates [March 2010]) of the FEIS, the State of California had a labor force of 18,317,000 people and a 13.0% unemployment rate, San Bernardino County had approximately 870,800 people in its labor force and a 14.8% unemployment rate, the City of Barstow had approximately 10,800 people in its labor force and an 18.3% unemployment rate. Compared to San Bernardino County unemployment rates, Barstow was 3.5% higher; and compared to State unemployment rates, Barstow was 5.3% higher.

Income

The median household income of San Bernardino County in 2008 was \$54,768. Barstow had a lower median household income than the County at \$35,069 in 1999, which is the most current data available for Barstow as of June 2010. The median household income of San Bernardino County was 10.2% below the median household income for California, which was \$61,017 in 2008.

Property Taxes

The Barstow Site is located on three San Bernardino County tax parcels, APNs 428-171-66, 428-171-67, and 428-171-68.

According to the San Bernardino County Assessor's office records, the total appraised value for all three parcels in 2010 was \$550,731, and the total property tax value for all three parcels in 2010 was approximately \$6,634. A portion of the property taxes collected by the County are distributed to local districts and the City of Barstow to fund public services.

Crime

As shown in Table 3.6-4 of the FEIS and presented in **Table 3**, crime rates per 100,000 people reported by the Barstow Police Department (BPD) in 2005 were higher than California. It is important to note that rates are presented as crimes per 100,000 people for comparison purposes. As shown, the population covered by the BPD for these statistics is 23,684. Therefore, the actual number of crimes for each category reported by the BPD in 2005 is less than one quarter the number shown.

TABLE 3. BARSTOW 2005 CRIME RATE PER 100,000 PEOPLE

Area	Population Coverage	Robbery	Aggravated Assault	Murder	Forcible Rape	Burglary	Larceny	Motor Vehicle Theft
Barstow Police Department	23,684	291.3	840.2	4.2	88.7	1,287.8	2,081.6	1,068.2
State of California	36,132,147	176.1	317.3	6.9	26.0	693.3	1,916.5	712.8

Source: Federal Bureau of Investigation, 2006; FEIS, Table 3.6-4.

Schools

The Barstow Unified School District (BUSD) serves an area of approximately 330 square miles, including the City of Barstow and the communities of Lenwood, Hodge, and Hinkley. The BUSD consists of eight elementary schools, one intermediate school, two middle/junior high schools, one senior high school, one continuation high school, and one adult school. In 2008/2009, enrollment in the BUSD was 6,774 students, the average class size was 26.0, and the student to teacher ratio was 21.1:1.

Lenwood Elementary School (grades K-5) is the closest elementary school to the Barstow Site, located approximately 3 miles to the northwest. The school has a total enrollment of 330 students and a staff of 19 teachers, resulting in a student to teacher ratio of 17.3:1. Barstow Junior High is the closer of the two middle/junior high schools to the Barstow Site, located approximately 5 miles to the northeast. The school has 973 students enrolled in grades 7-8 and a staff of 42 teachers, resulting in a student to teacher ratio of 23.1:1. Barstow High School, grades 9-12, is located approximately 6 miles northeast of the Barstow Site. The school has a total enrollment of 1,843 students and a staff of 75 teachers, resulting in a student to teacher ratio of 24.9:1.

The Barstow Community College District serves 12,000 square miles, including the City of Barstow and communities of Yermo, Daggett, Newberry Springs, Hinkley, and Baker. Barstow College is located at 2700 Barstow Road.

Environmental Justice Affected Environment

Section 3.6.4 of the FEIS identified the affected environment where Alternative A could have a disproportionately high and adverse effect on a minority population, low-income community, or competing gaming facilities.

Minority and Low-Income Communities

As shown in Table 3.6-10 of the FEIS and also in **Table 4**, Census Tracts 94, 95 and 120, have minority populations above the 50% threshold, and therefore are considered minority communities. As shown in Table 3.6-12 of the FEIS and presented below in **Table 5**, no low-income communities (i.e., falling below the poverty threshold) were identified.

TABLE 4. HOUSEHOLD INCOME – BARSTOW SITE AND ADJACENT CENSUS TRACTS

Census Tract	Median Household Income (1999)	Average Household Size	Poverty Threshold
City of Barstow	\$35,069	2.7	\$13,290
San Bernardino County	\$42,066	3.2	\$13,290
94	\$15,922	2.5	\$13,290
95	\$35,475	2.7	\$13,290
118	\$44,017	2.9	\$13,290
119	\$39,637	2.8	\$13,290
120	\$39,773	2.8	\$13,290

Source: U.S. Census Bureau, 2000, FEIS, Table 3.6-12

TABLE 5. MINORITY POPULATION – BARSTOW SITE AND REGION

Census Tract	2000 Population	Hispanic or Latino	Not Hispanic or Latino; population of one race; Black or African American alone	Not Hispanic or Latino; population of one race; American Indian and Alaska Native alone	Not Hispanic or Latino; population of one race; Asian alone	Not Hispanic or Latino; population of one race; Native Hawaiian and Other Pacific Islander alone	Not Hispanic or Latino; population of one race; some other race alone, other than white	Not Hispanic or Latino; population of two or more races	Minority	Percent minority
94	3,040	1,567	365	54	51	14	10	79	2,140	70%
95	6,819	2,498	651	105	148	37	12	191	3,642	53%
118	6,393	2,006	303	82	79	34	12	134	2,650	41%
119	3,644	921	85	46	48	12	12	83	1,207	33%
120	11,690	3,753	1,467	215	447	147	21	431	6,481	55%

Source: U.S. Census Bureau, 2000; FEIS, Table 3.6-10.

Gaming Market

As presented in the FEIS, development of Alternative A would generate revenues, some of which would be diverted from competing gaming facilities. These include San Manuel Indian Bingo & Casino, Morongo Casino Resort Spa, Primm Nevada, and Havasu Landing Casino. As shown in Table 3.6-14 of the FEIS, the closest casino to the Barstow Site is the San Manuel Indian Bingo & Casino (50 miles) and the farthest casino is the Havasu Landing Casino (185 miles).

Final EIS Impacts and Mitigation Measures

Impacts of the Barstow Site (Alternative A) were analyzed in Section 4.6, Socioeconomic Conditions and Environmental Justice, of the FEIS. Much of the socioeconomic analysis relied on data presented in the Los Coyotes Band of Cahuilla and Cupeño Indians Fee-to-Trust and Barstow Casino Project – Economic Impact and Growth Inducing Study (Economic Impact Study) included as Appendix O of the Draft EIS. This section also evaluated social impacts, community impacts, and environmental justice impacts.

Economic Effects

Construction and operation of Alternative A would generate substantial economic output to a variety of businesses in San Bernardino County. Given the location of Alternative A in Barstow, the local economy would be expected to capture a large portion of this output. Additionally, Alternative A would generate substantial fiscal impacts to State, County, and local governments.

Potential effects due to the loss of State and federal tax revenues resulting from the operation as a sovereign nation on trust land would be offset by increased local, State, and federal tax revenues resulting from construction and operation of Alternative A, and from revenue sharing programs per the tribal compact and the MSA. Overall, Alternative A would result in a beneficial impact to the County's economy.

Employment

Construction and operation of Alternative A would generate substantial temporary and ongoing employment opportunities and wages that would be primarily filled by the available labor force in the City and County. Given the projected unemployment rate, and the dynamics of the local labor market, the County is anticipated to be able to easily accommodate the increased demand for labor during the operation of Alternative A. This would result in employment and wages for persons previously unemployed, increasing the ability of the population to provide themselves with health and safety services and contributing to the alleviation of poverty among lower income households. Additionally, in accordance with Section 10 of the MSA, the Tribe shall work in good faith with the City to employ qualified City residents at the Tribe's resort facilities, as well as offer training programs to assist City residents in becoming qualified for positions at the casino-hotel. This is considered a beneficial effect.

Housing

Table 4.6-8 (Projected 2014 Housing Market) in the FEIS, projected that the County's housing market would have 734,831 total units and 84,212 vacant units, with a vacancy rate of 11.46%. The City's housing market is projected to have 10,656 total units and 1,852 vacant units, with a vacancy rate of 17.38%.

Based on regional housing stock projections, and current trends in County housing market data, there are anticipated to easily be more than enough vacant homes to support potential impacts to the regional labor market under Alternative A. Therefore, Alternative A is not expected to stimulate regional housing development. A significant adverse impact to the housing market would not occur.

Social Impacts

Pathological and Problem Gambling

Because residents of the County have been exposed to many forms of gambling, including destination casinos, for many years and the primary market for Alternative A is vehicle traffic passing through to Nevada and Arizona, an additional casino in the County under Alternative A is not expected to substantially increase the prevalence of problem gamblers. Nonetheless, upon the City's approval of the Tribe's development plans, the Tribe has agreed in the MSA to make a one-time \$40,000 contribution for the establishment of a problem gambling fund; and every year thereafter the Tribe shall make a \$40,000 annual contribution to help fund local problem gambling diversion, assistance, and counseling programs. With implementation of the Tribe's contributions as agreed upon in the MSA, no potential adverse impacts to regional problem gambling would occur.

Crime

Alternative A would introduce a large number of patrons and employees into the community on a daily basis. As a result, under Alternative A, criminal incidents would be expected to increase in the project area, particularly at the Barstow Site, as with any other development of this size. However, increased tax revenues resulting from Alternative A would fund expansion of law enforcement services required to accommodate planned growth. Thus, Alternative A would not result in significant adverse effects associated with crime.

Community Impacts

Public Schools

Because the County is anticipated to be able to easily accommodate the increased demand for labor during the operation of Alternative A, it is not anticipated that a significant number of employees would relocate to the area to accept a position at the Barstow Site. Given that any anticipated new students would be distributed across all grade levels from kindergarten through the continuation school, the limited number of potential new students would be considered a nominal impact on the BUSD. The BUSD would likely collect additional tax revenue from the families of new students and would use these taxes to hire additional teachers to meet additional demand, if necessary. Therefore, potential increased enrollment would have a nominal effect on the ability of BUSD to provide education services at existing levels. Additionally, in accordance with Section 5(A) of the MSA, the Tribe shall make payments to the BUSD equal to the service, development, and impact fees which BUSD would receive if the parcels were not taken into trust. With implementation of the MSA, Alternative A would not result in adverse impacts to public schools.

Other Public Facilities

Effects to services provided by libraries, parks, and other public amenities could result if frequented by employees or patrons from Alternative A. Due to the entertainment nature of Alternative A, it is not expected that patrons would substantially increase demand on libraries, parks, or other public amenities. Employees relocating to the County for employment opportunities would demand some new usage of public facilities. However, because employees would be dispersed throughout the County, effects to public facilities would be less than significant.

Environmental Justice

Minority and Low-Income Communities

Three minority communities in census tracts 94, 95, and 120 were identified. Primary traffic impacts would occur on area highways and intersections/interchanges. Localized impacts on the Barstow Site would not affect these census tracts. Regional impacts would be distributed throughout the region. Alternative A would benefit all communities within proximity of the Barstow Site by creating employment opportunities that would be primarily filled by the local labor market. These communities would not be disproportionately adversely impacted and a less-than-significant impact would result.

Competition

The three closest tribal gaming facilities are the San Manuel Indian Bingo & Casino located in the County approximately 50 miles southwest, the Morongo Casino Resort Spa located in Riverside County approximately 100 miles south, and the Havasu Landing Casino located in San Bernardino County approximately 185 miles to the east. The majority of revenue under Alternative A would be new revenue generated by additional spending by pass-through traffic and residents near the Barstow Site.

This revenue would be diverted from a variety of existing gaming opportunities, including the three existing tribal casinos in the local competitive gaming market, Las Vegas casinos, Primm casinos, and local card rooms. No single gaming facility is expected to be affected disproportionately. Given the substantial levels of gaming wins at these facilities annually, declines from a substitution effect of this magnitude would have a minimal, if any, adverse effect on operation. In fact, the addition of a casino to the regional gaming market could contribute to overall growth of the market. This would be a beneficial impact.

Mitigation Measures

As stated in Section 5.6 (Socioeconomic Conditions and Environmental Justice) of the FEIS, the following provisions of the MSA are applicable to Alternatives A and B, and would avoid, minimize, or mitigate adverse socioeconomic effects:

1. In accordance with Section 5(A) of MSA, the Tribe agrees to pay the City amounts equal to the service, development, and impact fees which, if the parcels were not in trust status, would be charged by the City and other local agencies at the time of any and all project development(s) on trust lands (including payments to the City and the Barstow Fire Protection District). The Tribe shall also make payments to the BUSD equal to the service, development, and impact fees that BUSD would receive if the parcels remained in fee.

2. In accordance with Section 10 of the MSA, subject to tribal employment preferences, the Tribe shall work in good faith with the City to employ qualified City residents at the Tribe’s casino-hotel facilities to the extent permitted by applicable law. The Tribe shall offer training programs to assist City residents in becoming qualified for positions at the casino-hotel to the extent permitted by applicable law.
3. In accordance with Section 12 of the MSA, the Tribe shall, upon the City’s approval of the Tribe’s construction plans and the City’s completion of all building plan checks, make a one-time payment to the City of \$40,000 for the establishment of a Problem Gambling Fund. Thereafter, the Tribe shall make annual contributions to the City in the amount of \$40,000 to help fund local problem gaming diversion/assistance/counseling programs.
4. In accordance with Section 13 of MSA, the Tribe shall compensate the City by making gaming revenue payments of 4.3% of “Net Win” on Class II and Class III games of chance, as identified in the IGRA.

Changes to the Environmental and Regulatory Setting

Population

The most recent population data in the FEIS for the State of California, San Bernardino County, and City of Barstow was from 2010. This information has been updated with 2022 population data. A comparison of 2010 and 2022 population data is presented in **Table 6** below. As indicated in **Table 6**, State, County, and City population growth between 2010 and 2022 decreased substantially from the Statewide growth of 14%, County growth of 21%, and City growth of 15% between the years of 2000 and 2010 presented in Table 3.6-1 of the FEIS.

TABLE 6. BARSTOW SITE 2010 AND 2020 REGIONAL POPULATION

Location	Population		
	2010	2022	Change
State of California	38,648,090	39,185,605	1.4%
San Bernardino County	2,073,149	2,187,665	5.5%
City of Barstow	24,281	25,202	3.8%

Source: FEIS, Table 3.6-1; California Department of Finance, 2022a.

Housing

The most recent housing data presented in the FEIS was from 2010. This information has been updated with 2022 housing data. A comparison of 2010 and 2022 housing data for the State, County, and City is presented in **Table 7** below. As indicated in **Table 7**, between the year 2010 and 2022, the number of units have increased in the State and the County, while the vacancy rate has increased in the State and decreased in the County. The number of units and the vacancy rate have decreased in the City.

Employment

The most recent employment data presented in Table 3.6-3 of the FEIS was from March 2010. This information has been updated with September 2022 employment data. A comparison of 2010 and 2022 labor force data for the State, County, and City is presented in **Table 8** below.

TABLE 7. BARSTOW SITE 2010 AND 2022 REGIONAL HOUSING

Location	2010		2022	
	Total Units	Vacant	Total Units	Vacant
State of California	13,591,866	5.9%	14,583,998	6.7%
San Bernardino County	693,712	11.58%	740,654	8.9%
City of Barstow	10,160	17.10%	9,622	8.9%

Source: FEIS, Table 3.6-2; California Department of Finance, 2022b.

TABLE 8. BARSTOW SITE 2010 AND 2022 LABOR FORCE ESTIMATES

Location	2010 (March)			2022 (September)		
	Labor Force	Unemployed	Unemployment Rate	Labor Force	Unemployed	Unemployment Rate
State of California	18,317,000	2,381,000	13.0%	19,284,300	716,300	3.7%
San Bernardino County	870,800	128,900	14.8%	1,020,300	39,000	3.8%
City of Barstow	10,800	2,000	18.3%	10,500	500	5.0%

Source: FEIS, Table 3.6-3; Employment Development Department, 2022.

As indicated in **Table 8**, between the year 2010 and 2022, the unemployment rate substantially decreased. While the labor force increased in the County and the State, the labor force in the City has slightly decreased since 2010. Compared to September 2022 County unemployment rates, the City rates were 1.2% higher; and compared to State unemployment rates, City rates were 1.3% higher.

Income

Based on 2020 census data, the median household income for the State was \$84,907, for the County was \$74,846, and for the City was \$42,912 (U.S. Census Bureau, 2020). The City is 42.7% below the median household income for the County and the County is 11.8% below the median household income for the State (U.S. Census Bureau, 2020).

Property Taxes

Based on 2022 San Bernardino County Assessor’s office records, the total appraised value for all three parcels that comprise the Barstow Site (APNs 428-171-66, 428-171-67, and 428-171-68) was \$669,897 and the total property tax was approximately \$8,367 (County, 2022). A portion of the property taxes collected by the County are distributed to local districts and the City of Barstow to fund public services.

Crime

The crime rate statistics presented in **Table 9** includes data from 2019 that compares the City crime rates with those of the State. As shown in **Table 9**, there has been an overall decrease in crime in the City in 2019 compared to similar categories analyzed in Table 3.6-4 of the FEIS.

TABLE 9. BARSTOW 2019 CRIME RATE PER 100,000 PEOPLE

Area	Population Coverage	Robbery	Aggravated Assault	Murder	Forcible Rape	Burglary	Larceny	Motor Vehicle Theft
Barstow Police Department	24,121	82	177	5	10	285	527	174

Source: Federal Bureau of Investigation, 2019.

Schools

As of 2022, the BUSD consists of seven elementary schools, two middle/junior high schools, one senior high school, one continuation high school, and two community day schools (grades 2-6 and 8-12). Enrollment in the BUSD was 6,401 students in 2021/2022 (Ed-Data, 2022). Lenwood Elementary School (grades K-6) is the closest elementary school to the Barstow Site with a total 2021-2022 enrollment of 464 students. Barstow Junior High school (grades 5-8) has a 2021-2022 enrollment of 757 students. Barstow High School (grades 9-12) has a total enrollment of 1,634 students (Ed-Data, 2022). Compared to the 2010 enrollment data presented in the FEIS, enrollment at Lenwood Elementary has increased, while enrollment at Barstow Junior High and Barstow High School has decreased.

The following is updated information about the Barstow Community College District (BCCD): The BCCD encompasses a vast service area, stretching from the Nevada border in the east to Kern County in the west, and from Inyo County in the north to the San Bernardino mountain range in the south. BCCD serves the communities of Barstow, Lenwood, Newberry Springs, Daggett, Yermo, Hinkley, Ludlow, and Baker.

The institution also maintains a satellite learning center at the U.S. Army National Training Center in Fort Irwin, California, which serves military personnel and their families. Total enrollment for Spring 2020 was 9,197 students (BCCD, 2021).

Minority and Low-Income Communities

Current census data was not available to compare the minority and low-income community data presented in Tables 4 and 5 above. A review of the area using EPA’s EJScreen indicated similar results to the census tract analysis conducted for the FEIS (EPA, 2022). The results indicate minority populations exceed 80th percentile of the national average in the central region of the City, northeast of the Lenwood area where the project site is located. In the vicinity of the project site in the Lenwood area, minority populations are less than 50th percentile of the national average. The low-income data from EJScreen exhibit a similar trend to the census data for low income communities. Accordingly, the results indicate no significant change to the minority and low-income community settings compared to the census tract assessment in the FEIS.

Findings

Although the Economic Impact Study was prepared in 2011, the analysis and conclusions would not substantially change, even with updates to the Impact Analysis and Planning model regarding costs, employment, wages, revenues, substitution effects, labor market, and housing market, because the components of Alternative A and associated number of workers have not changed. Impacts related to increased employment and income opportunities are considered beneficial effects of the Project and would alleviate unemployment still present in the area.

As discussed above, the population of the area surrounding the Barstow Site has increased. This means the potential increase in population attributable to the Project would constitute a negligible and smaller proportion than what was considered in the FEIS. Sufficient vacant housing is still present for potential population increases related to the Project, and would not require additional housing development in the area.

Although the property taxes collected by the City have increased, mitigation related to gaming revenue payments to the City and the increase in employment and recreational activities in the City would still surpass the loss of property taxes for the City.

As discussed above, crime rates have decreased and school attendance numbers have fluctuated. Per the Project mitigation, the Tribe will negotiate payments to service providers such as the Barstow Fire Protection District. The Tribe will also make payments to the BUSD equal to the service, development, and impact fees that BUSD would receive if the parcels remained in fee. These payment amounts have not yet been determined and would consider the minor fluctuations in service demands that have occurred since the FEIS.

Similarly, changes to the regional population, vacancy rates, unemployment rates, student enrollment, and minority and low-income communities, would not result in additional impacts to socioeconomic conditions or environmental justice beyond those identified in the FEIS. Therefore, with implementation of the provisions of the MSA and mitigation of the FEIS, impacts to socioeconomic conditions and environmental justice would remain less than significant, as described in Section 4.6.1 of the FEIS.

3.7 TRANSPORTATION/CIRCULATION

Final EIS Setting

Section 3.7 of the FEIS described the existing roadway network; transit, bicycle and pedestrian facilities; study intersections and roadway segments; existing intersection, roadway segment, and freeway segment performance; ramp diverge operations; and intersection queuing.

Existing Circulation Network

The existing circulation network, Circulation Element classification, and daily traffic volumes in the study area include the following:

- I-15 (Existing Freeway; 11,400 to 73,000 vehicles per day)
- SR-58 (Proposed Freeway; 11,400 to 12,000 vehicles per day)
- Main Street (Major Highway; 3,400 to 8,200 vehicles per day)
- High Point Parkway (Proposed Major Highway; 4,700 vehicle per day)
- Mercantile Way (Major Highway; 1,400 vehicles per day)
- Outlet Center Drive (not classified; 800 vehicles per day)
- Lenwood Road (Major Highway; 120 to 890 vehicles per day)
- Factory Outlet Avenue (not classified; 800 vehicles per day)

Transit, Bicycle, and Pedestrian Facilities

Public transportation includes fixed route and Dial-A-Ride service operating six days per week by the Barstow Area Transit. There are three primary routes that provide service to all of the major traffic generators/attractions in the City. All routes begin and end at the Harvey House/transit center and operate at one-hour headways, with each route leaving at the top of the hour between 7:00 a.m. and 6 p.m. There are no separate facilities for bicycles or equestrian users within the present circulation system. Bicycles utilize public roadways along with other traffic. Lenwood Road east of I-15 and Main Street are part of the existing City-wide bicycle plan.

Study Intersections and Roadway Segments

Study intersections, roadway segments, and freeway segments include the following:

- Lenwood Road/SR-58
- Lenwood Road/Main Street
- SR-58 eastbound ramps/Main Street
- SR-58 westbound ramps/Main Street
- I-15 southbound ramps/Lenwood Road
- I-15 southbound ramps/Outlet Center Drive
- I-15 northbound ramps/Lenwood Road
- I-15 northbound ramps/Outlet Center Drive
- Lenwood Road/Mercantile Way
- Lenwood Road/Project Access
- Factory Outlet Avenue/Mercantile Way
- Lenwood Road–I-15 northbound ramps to Mercantile Way
- Lenwood Road–Mercantile Way to Project Access
- Lenwood Road–Project Access to Outlet Center Drive
- Outlet Center Road–Lenwood Road to I-15 N northbound ramps
- L Street to Lenwood Road (I-15 Southbound)
- Outlet Center Drive to Hodge Road (I-15 Southbound)
- L Street to Lenwood Road (I-15 Northbound)
- Outlet Center Drive to Hodge Road (I-15 Northbound)

Existing Intersection, Roadway Segment, and Freeway Segment Performance

Existing intersection performance is shown in Table 3.7-3 of the FEIS. Table 3.7-3 includes the weekday and Saturday intersection delay and Level of Service (LOS) for both the mid-day and evening peak hours at each of the study intersections. Per Table 3.7-3, each of the study intersections operates at an acceptable LOS of D or better under existing conditions.

Existing roadway segment performance are shown in Table 3.7-4 of the FEIS. Table 3.7-4 includes volume to capacity ratios and LOS for the study area roadway segments. Per Table 3.7-4, all of the study roadway segments operate within an acceptable LOS under existing traffic conditions. Existing freeway segment performance are shown in Table 3.7-5 of the FEIS. Table 3.7-5 includes existing volume to capacity ratios and LOS for the study area freeway segments. Per Table 3.7-5, all of the study freeway segments operate within an acceptable LOS under existing traffic conditions.

Ramp Diverge Operations

Ramp diverge operations is a measurement of the ability of a vehicle to enter the first lane of a multi-lane roadway. The existing ramp diverge operations at I-15 northbound/southbound off-ramps to Lenwood Road for the weekday, and Saturday mid-day and PM peak-hour and Sunday PM peak-hour are shown in Tables 1, 2, 3, 4, 14, and 15 of Appendix Q of the FEIS. As shown in the tables, existing ramp diverge operations are acceptable.

Intersection Queuing Operations

Existing lane queuing lengths at I-15 northbound/southbound off-ramps to Lenwood Road and at I-15 northbound/ southbound off-ramps to Outlet Center Road for the weekday, and Saturday mid-day and PM peak-hour and Sunday PM peak-hour are provided in Tables 5, 6, 7, 8, 16, and 17 of Appendix Q of the FEIS. As shown in the tables, there is sufficient capacity to accommodate the existing 50th and 95th percentile queues under existing conditions. The 50th and 95th percentile queue is defined to be the queue length (in vehicles) that has only a 50% and 95% probability, respectively, of being exceeded during the analysis time period.

Final EIS Impacts and Mitigation Measures

Impacts of the Barstow Site (Alternative A) on transportation and circulation, including site access, construction traffic, project traffic, traffic signal warrant, ramp divergence operations, intersection queuing operations, and transit, bicycle, and pedestrian facilities were analyzed in Section 4.7, Transportation/Circulation, of the FEIS and are summarized below.

Site Access

Access to the Barstow Site is proposed via one driveway located along Lenwood Road approximately 300 yards south of the existing Hampton Inn Driveway. The project driveway would have full turning access to the Barstow Site and would satisfy the City's corner sight distance standards. The intersection of Lenwood Road/Project Access would be signalized as described below.

Construction Traffic

Construction of Alternative A would require truck trips for the export of fill, import of materials and equipment, and daily construction workers trips. Traffic impacts resulting from the construction of Alternative A construction activities would be temporary and intermittent in nature and would generally occur during off-peak traffic hours (5 a.m. to 6 a.m. and 10 a.m. to 4 p.m.). Construction activity impacts would be concentrated on Lenwood Road in the immediate vicinity of the Barstow Site. Traffic-related construction impacts may include traffic delays, one-way traffic control, temporary road closures, and traffic detours. Daily construction trips are estimated to be approximately 300, including construction worker trips, material delivery, equipment delivery, and fill exportation. Traffic generated by the construction of Alternative A would be less than operational traffic, which, as discussed below, does not lead to a decrease in LOS below established thresholds. In addition, construction traffic is temporary; therefore, significant adverse effects associated with construction traffic would not occur.

Trip Generation and Trip Distribution

The projected vehicle trip generation for Alternative A is shown in Table 4.7-1 (Alternative A Peak Hour Trip Generation) of the FEIS. The trip generation rates were based on methodology described in Subsection 4.7.1 of the FEIS and Appendix H of the Draft EIS. Trip generation rates were adjusted to include diverted-trip links or the number of trips that already exist on the roadway that would also be visiting the casino-hotel. As presented in Table 4.7-1 of the FEIS, the proposed casino, hotel, and restaurant uses would generate 622 new trips during the Weekday Mid-day Peak Hour; 757 new trips during the Weekday PM Peak Hour; 1,043 new trips during the Saturday Mid-day Peak Hour; and 1,043 new trips during the Saturday PM Peak Hour. The distribution of new trips generated by Alternative A is shown on Figure 4.7-1 of the FEIS, based on peak hour traffic counts of the existing directional distribution of traffic in the vicinity of the Barstow Site and information on future development and traffic impacts in the area.

Background Traffic Conditions

Opening year 2013 traffic conditions were assessed by combining existing traffic with areawide growth and other approved development in the project area (as shown in Table 8-1 of the Traffic Impact Analysis [TIA] in Appendix H of the Draft EIS). Background traffic conditions were then used to assess background intersection operations, background roadway segments, and background freeway segments. As shown in Table 4.7-2 (Background Intersection Conditions – 2013 No Project) of the FEIS, each of the study intersections would operate at an acceptable LOS of C or better under background traffic conditions. As shown in Table 4.7-3 (Background Roadway Segment Conditions – 2013 No Project) of the FEIS, all of the study roadway segments are projected to operate within an acceptable LOS under background traffic conditions. As shown in Table 4.7-4 (Background Freeway Segment Conditions – 2013 No Project) of the FEIS, all of the study roadway segments are projected to operate within an acceptable LOS under background traffic conditions.

Traffic Conditions Plus Alternative A

Project impacts on intersection operations, roadway segment operations, and freeway segment operations were assessed on transportation facilities in the study area by adding the projected number of trips generated by Alternative A to background year traffic volumes. As shown in Table 4.7-5 (Background Plus Alternative A Intersection Condition – Opening Year 2013) of the FEIS, with the addition of Alternative A-related traffic, the intersection at Lenwood Road/Project Access would operate at LOS F, which is below the City's acceptable LOS standards. As shown in Table 4.7-6 (Background Plus Alternative A Roadway Segment Conditions – Opening Year 2013) of the FEIS, with implementation of Alternative A, all of the study roadway segments are projected to operate within an acceptable LOS of A or B. As shown in Table 4.7-7 (Background Plus Alternative A Freeway Segment Conditions – Opening Year 2013) of the FEIS, with implementation of Alternative A, all of the study freeway segments are projected to operate within an acceptable LOS of B.

Traffic Signal Warrant Analysis

A traffic signal is anticipated to be warranted under background plus Alternative A traffic conditions at the study area intersection of Lenwood Road/Project Access.

Ramp Diverge Operations

A ramp diverge operations analysis was conducted at the I-15 northbound/southbound off-ramps to Lenwood Road for the weekday, Saturday mid-day and PM peak-hour, and Sunday PM peak-hour (refer to Tables 1, 3, and 14 of Appendix Q of the FEIS). The ramp diverge operations were determined to be greatest during the Sunday PM peak-hour. As shown in the Table 14 (Sunday Opening Year 2013 Ramp Diverge Operations) in Appendix Q of the FEIS, ramp diverge operations during the Sunday PM peak-hour would operate at LOS B and C and therefore not exceed the County's significance threshold of LOS D. Thus, Alternative A would not have a significant adverse effect on ramp diverge operations at the I-15 northbound/southbound off-ramps to Lenwood Road.

Intersection Queuing Operations

An intersection queuing operations analysis was conducted at the I-15 northbound/southbound off-ramps to Lenwood Road and at I-15 northbound/southbound off-ramps to Outlet Center Road for the weekday, Saturday mid-day and PM peak-hour, and Sunday PM peak-hour. As shown in Tables 5, 7, and 16 of Appendix Q of the FEIS, there is sufficient capacity to accommodate the expected 50th and 95th percentile queues at the I-15/Lenwood Road northbound and southbound off-ramps with or without Alternative A during the buildout year 2013 at the movements in which the project adds trips. Based on the project trip distribution, project trips are only added to the I-15 northbound off-ramp/Outlet Center Drive northbound right-turn movement. As shown in Tables 5, 7, and 16 of Appendix Q of the FEIS, sufficient capacity is available to serve the buildout year 2013 traffic queues with and without Alternative A project traffic. Therefore, Alternative A would not have a significant adverse effect on traffic queuing at the I-15 northbound/southbound off-ramps to Lenwood Road or at the I-15 northbound/southbound off-ramps to Outlet Center Road.

Transit, Bicycle, and Pedestrian Facilities

Implementation of Alternative A may result in increased use of the Barstow Area Transit System (BATS). Through the terms of the MSA, the Tribe shall contribute funding to the City that would compensate for increased use of the City's public services. Increased public use of BATS is not anticipated to adversely impact existing service levels and could contribute additional funding for the system.

No bicycle lanes or pedestrian sidewalks exist in the vicinity of the transportation study area for Alternative A. Alternative A is not projected to generate a substantial increase in bicycling activity or pedestrian trips. The City of Barstow Non-Motorized Circulation Plan identifies Lenwood Road east of I-15 and Main Street as potential future locations for Class I bikeways. However, with the addition of Alternative A-related traffic, the LOS along these roadways would remain within acceptable levels. Therefore, development of Alternative A would have no adverse effects on existing or planned bicycle or pedestrian facilities.

Summary of Traffic Impacts

The increase in traffic generated by Alternative A would not contribute to unacceptable traffic operations at any of the study intersections other than the Lenwood Road/Project Access intersection. Without mitigation, the Lenwood Road/Project Access intersection would operate at levels as low as LOS F.

Additionally, during peak hours there is the potential for southbound left turns entering the Barstow Site to spill over into the southbound through lane, which could result in queuing that could affect the ability of northbound vehicles to access existing business' driveways to the west. Implementation of mitigation measures provided in Section 5.7 of the FEIS would restore the Lenwood Road/Project Access intersection to satisfactory operations based on City LOS standards; therefore, development of Alternative A would have minimum adverse effect on traffic and circulation.

Mitigation Measures

Mitigation measures for Alternatives A and B are provided in Section 5.7, Transportation/Circulation, of the FEIS and are listed below.

Municipal Services Agreement

- In accordance with Section 6 of the MSA, the Tribe has agreed to pay all required traffic mitigation fees consistent with the City's fee programs and ordinances and pay for all road improvements that are reasonable and necessary.
- The Tribe has also agreed that if an increase in traffic is caused by the Tribe's undertaking of other development projects on trust lands and additional road improvements or expansions are required, the Tribe shall grant suitable rights-of-way to the City in order to accommodate the necessary road improvements or expansions and make the necessary improvements.

The following mitigation measures are recommended for Alternatives A and B and should be implemented in the opening year to reduce potential adverse effects to the area transportation and circulation network.

Lenwood Road/Project Access Intersection:

Signalize intersection when signal warrants are met. Signal timing at the driveway shall be developed to minimize southbound left-turn queuing into the site.

Reconfigure lane geometry as follows:

- Northbound: one dedicated right-turn lane, and one thru-lane.
- Southbound: two dedicated left-turn lanes, one thru-lane. Southbound left-turn pockets shall be sized appropriately to accommodate peak demand to the Barstow Site.
- Westbound: one dedicated left-turn lane, and two dedicated right-turn lanes.

Implementation of the above mitigation measure would result in an acceptable LOS at the Lenwood Road/Project Access intersection. The above mitigation would require the approval of an encroachment permit by the City.

The above mitigation measure is recommended for Alternatives A and B in the cumulative year 2035 to reduce potential adverse effects to the area transportation and circulation network. The Tribe would provide a fair share contribution to the implementation the following mitigation measures, which are recommended for Alternatives A and B in the cumulative year 2035 to reduce potential adverse effects to queuing on the I-15 southbound/northbound ramps at Lenwood Road and I-15 southbound/northbound ramps at Outlet Center Drive:

- Require all casino/hotel employees driving northbound on I-15 to utilize the Outlet Center Drive interchange.
- Require that casino/hotel literature list the Outlet Center Drive interchange as the main access to the casino/hotel.
- Require the traffic control personnel direct the majority of traffic to the Outlet Center Drive interchange for special events.
- Provide signs on northbound I-15 south of the Outlet Center Drive interchange directing casino/hotel traffic to use the Outlet Center Drive interchange.
- Signalize the two ramps at the Outlet Center Drive interchange. This would improve interchange operation.
- The Tribe would provide a fair share contribution to future improvements to the I-15 northbound off-ramp at Lenwood Road.

Changes to the Environmental and Regulatory Setting

There are no changes to the components of Alternative A, as shown in **Table 1** of the SIR and Table 2-1 of the FEIS; therefore, trip generation rates and distribution assumptions used in the TIA would remain the same as the FEIS. Based on a review of Google Earth, the existing circulation network remains the same as shown on Figure 3.7-1 of the FEIS. There are also no changes to site access, construction traffic, existing bicycle facilities, or existing pedestrian facilities.

City of Barstow General Plan

A description of the City of Barstow General Plan Circulation Element’s classification of the existing circulation network in the vicinity of the Project Area was presented in Section 3.7.1 of the FEIS, based on the 1997 General Plan. The General Plan, including the Circulation Element, was revised in February 2015. The Circulation Element addresses the local roadway network as well as alternative means of transportation, such as bicycle and pedestrian travel throughout the City. The Circulation Element includes the same LOS classifications to characterize roadway operating conditions as used in the TIA and Section 4.7 of the FEIS. However, the roadway classifications have been updated as shown on Exhibit C-1, Circulation Map (City, 2015b). The following street classifications for the existing circulation network in the project area are updated as follows:

- I-15 – Freeway (minimum 160-foot Right-of-Way [ROW])
- SR-58 – Freeway
- Main Street – Primary Arterial (100-foot ROW)
- High Point Parkway – Primary Arterial (east of Lenwood Road) and Collector (60-foot ROW) with Existing EV Charging Stations (west of Lenwood Road)
- Mercantile Way – Collector (east of Lenwood Road)
- Outlet Center Drive – Primary Arterial
- Lenwood Road – Primary Arterial
- Factory Outlet Avenue – Local Street (50-60-foot ROW)

Exhibit C-2, Pedestrian Paths, Bicycle Routes, and Park and Ride Facilities of the Circulation Element, illustrates the City’s planned network of pedestrian paths, bikeways, and park and ride facilities.

However, as noted on this exhibit, the pedestrian and bicycle routes may be updated and the latest version may be obtained from the City's Engineering Department. Exhibit C-2 depicts a Pedestrian Facility along Mercantile Way that connects to a Pedestrian Facility and Bike Lane/Route at Lenwood Road north of Mercantile Way (City, 2015b).

San Bernardino County Congestion Management Program

Regarding the County's Congestion Management Program (CMP), the CMP was prepared by the San Bernardino Associated Governments (SANBAG) and was updated in 2016. As of January 1, 2017, SANBAG is now two agencies: the San Bernardino County Transportation Authority (SBCTA) and the San Bernardino Council of Governments. The SBCTA is responsible for the modifications, refinements, and updates to the CMP. The current CMP includes LOS standards as referenced in the FEIS, including LOS E on freeways (SANBAG, 2016).

Other CTA Plans

Other new plans on the SBCTA website include the following: 1) San Bernardino Countywide Transportation Plan (CTP): Interim 2021 Update; 2) Non-Motorized Transportation Plan (revised June 2018); and 3) Long Range Transit Plan (2010) (SBCTA, 2022).

The purpose of the CTP Interim 2021 Update is to provide a strategy for the long-term investment in and management of the County's regional transportation assets. The interim update was scheduled to be followed with a major update anticipated to be initiated in 2022; however this update has been delayed.

An objective of the CTP is to reduce vehicle miles traveled and travel times for both highway and transit travel. As shown on Table ES-1 (2019 Ten-Year Delivery Plan Projects) in the 2021 Countywide Transportation Plan, no Measure I Programs were identified in the project area (SBCTA, 2021).

The goal of the Non-Motorized Transportation Plan (NMTP) is to develop a comprehensive bicycle and pedestrian network throughout San Bernardino County. The NMTP includes a local jurisdiction plan for the Barstow area. As stated in the NMTP, there are currently no bicycle facilities in the City. As shown on Figure 5.6 of the NMTP, a future Class II Bikeway is planned along Lenwood Road and Mercantile Way. As listed on Table 5.12 of the NMTP, Barstow Proposed Improvements, a Class II Bikeway would extend along Lenwood Road from High Pointe Parkway south to Mercantile Way (SBCTA, 2018).

Barstow Area Transit System and Victor Valley Transit Authority

Based on a review of recent BATS information, bus service is substantially unchanged from the FEIS. As stated in the 2012 Transit Schedule, BATS provides three primary routes that begin and end at the City Hall Transfer Center as well as Dial-A-Ride services, and services operate at one-hour headways. Bus service runs between 7:00 a.m. and 6:52 p.m. on weekdays with reduced hours on Saturday and Sunday. City Route 3 provides bus service from the City Hall Transfer Station to Tanger Outlet Mall (BATS, 2012).

In addition to BATS, bus service in the vicinity of the Barstow Site is also provided by Victor Valley Transit Authority (VVTA). The VVTA has 34 bus routes in its service area (identified as the Victorville Barstow service area by VVTA). Route 3 provides service between Lenwood Road–Hampton Inn to E. Mountain View and 2nd Avenue. Route 3 operates at one-hour headways, beginning at 6:00 a.m. and ending at 7:00 p.m. The closest bus stop to the Barstow Site is Lenwood Road and Mercantile Way (VVTA, 2022).

Updated Traffic Information

Updated cumulative projects information and an updated transportation analysis were provided by Linscott, Law & Greenspan, Engineers (LLG) and are included as **Attachments A** and **B**, respectively, of this SIR.

Updated traffic counts at the intersection of Lenwood Road/Mercantile Way and three roadway segments along Lenwood Road were conducted in May 2022. Comparisons between Year 2022 and Year 2010 baseline counts are provided in **Table 10** and **Table 11**. As shown in **Table 10**, PM Peak Hour traffic volumes increased at the intersection of Lenwood Road/Mercantile Way from 189 in Year 2010 to 213 in Year 2022. As shown in **Table 11**, average daily traffic (ADT) for Year 2022 decreased at all roadway segments along Lenwood Road compared to Year 2010 conditions. In addition, ADT on I-15 at Lenwood Road decreased from 55,000 in Year 2010 to 54,000 in Year 2020.

TABLE 10. EXISTING INTERSECTION COMPARISON SUMMARY

Intersection	Weekday	
	Year 2022 PM Peak Hour Entering Volumes	Year 2010 PM Peak Hour Entering Volumes
Lenwood Road/Mercantile Way	213	189

Source: LLG, 2022.

TABLE 11. EXISTING ROADWAY SEGMENT COMPARISONS

Lenwood Road	Weekday	
	Existing 2022	Existing 2010
I-15 northbound ramps to Mercantile Way	5,670 ADT	10,560 ADT
Mercantile Way to Project Access	1,960 ADT	2,200 ADT
Project Access to Outlet Center Drive	1,220 ADT	1,270 ADT

Source: LLG, 2022.

The following additional cumulative projects were included that are likely to be built and would add background traffic to the study area intersections in the near-term future:

- 2796 Tanger Way (Tesla Supercharger site)
- 2551 Mercantile Way – (new Fairfield Inn and Marriott hotels)
- Tortoise Road – (single-family homes)

In addition, a comparison of Horizon Year 2035 and an updated Horizon Year 2040 traffic volumes was provided. As shown in **Table 12**, Horizon Year Roadway Segment Operations, ADT would increase at two roadway segments compared to Horizon Year 2035 conditions.

One segment, Lenwood Road from the I-15 northbound ramps to Mercantile Way, is projected to have a Horizon Year 2040 traffic volume considerably below the Horizon Year 2035 volume anticipated by the 2010 LLG TIA (Appendix H of the Draft EIS). Historically, traffic near the Barstow Site was related to the Outlets at Barstow, lodging, dining, and truck stops.

As cumulative projects identified in the FEIS have been built out, it appears that traffic volumes generated by these amenities near the Barstow Site have decreased. Specifically, buildout of new dining options and a Walmart Supercenter has likely altered local driver behavior and decreased the likelihood that residents of Barstow would travel outside the more densely developed areas along I-15 to access the amenities near the Barstow Site. While access via I-15 is anticipated to decrease, certain internal vehicle trips further along Lenwood Drive and Outlet Center Drive, including truckers utilizing stopover lodging and dining and employees working and dining near the Barstow Site would likely remain unchanged. This change represents a clearer understanding of local driver patterns as cumulative project buildout occurs that could not have been fully predicted by the FEIS. This decrease in anticipated horizon year traffic volume is consistent with a decrease in 2022 traffic counts compared to 2010 traffic counts as well as projected Horizon Year 2040 counts provided by the updated San Bernardino Transportation Analysis Model.

TABLE 12. HORIZON YEAR ROADWAY SEGMENT OPERATIONS

Roadway Segment	Horizon Year 2040	Horizon Year 2035
Lenwood Road		
I-15 northbound ramps to Mercantile Way	11,663 ADT	17,880 ADT
Mercantile Way to Project Access	7,250 ADT	5,730 ADT
Project Access to Outlet Center Drive	3,325 ADT	3,500 ADT
Outlet Center Drive		
Lenwood Road to I-15 northbound ramps	3,325 ADT	2,870 ADT
Source: LLG, 2022.		

Findings

As discussed above, there are no changes to Alternative A’s components, existing street network, existing bicycle and pedestrian facilities, site access, or construction traffic compared to what was analyzed in the FEIS. Since publication of the FEIS, one additional bus route and bus service provider (VVTA) was identified and a change of a future bicycle lane designation from Class I to Class II along Lenwood Boulevard, a Class II bicycle lane along Mercantile Way, and a Pedestrian Facility along Mercantile Way that connects to a Pedestrian Facility and Bike Lane/Route at Lenwood Road. Also, the street classifications have been updated. The increase in bus ridership for both BATS and VVTA would be addressed through the MSA, which includes contribution to public services. Therefore, these changes are minor and do not affect the analysis or conclusions presented in the FEIS.

The following plans are new or updated since publication of the FEIS:

- City of Barstow General Plan Circulation Element
- San Bernardino County Congestion Management Program
- San Bernardino CTP: Interim 2021 Update
- SBCTA Non-Motorized Transportation Plan
- SBCTA Long Range Transit Plan

Generally, the intent of these plans is to reduce vehicle miles traveled and increase the use of and improve alternative transportation, such as public transit, bicycle facilities, and pedestrian facilities.

The analysis in the FEIS concluded that Alternative A would not generate a substantial increase in bicycle activity or pedestrian trips and LOS would remain within acceptable levels; therefore, no adverse effects on existing or planned bicycle or pedestrian facilities would occur. However, Alternative A does not include a sidewalk along Lenwood Road or other components to improve pedestrian and bicycle access. As stated in the FEIS, through the terms of the MSA, the Tribe shall contribute funding to the City for increased use of public services. In particular, Section 13 of the MSA would provide additional funding to the City through Gaming Revenue Payments that could be used for bicycle and pedestrian improvement along Lenwood Road or other planned bicycle and pedestrian facilities. Therefore, no new impacts would occur on bicycle and pedestrian facilities and no additional mitigation measures are required.

Regarding updates to the TIA presented in the LLG letter dated June 29, 2022 and provided as **Attachment B**, based on updated traffic counts provided in **Table 10** and **Table 11**, the Year 2022 traffic volumes are similar to or less than Year 2010 traffic volumes. In addition, traffic volumes on I-15 at Lenwood Road were less in 2020 compared to 2010 conditions. Therefore, the conclusions and mitigation measures presented in the TIA are valid. No new impacts were identified and no additional mitigation measures are proposed.

Regarding the three additional cumulative projects and Horizon Year Roadway Segment operations, presented in the LLG letter dated June 13, 2022 and provided as **Attachment A**, the addition of these projects to Table 8-1 (Cumulative Projects Trip Generation Summary) in Appendix H of the Draft EIS would not change the conclusions presented in the TIA or FEIS, due to buildout of several cumulative projects identified in Table 8-1, a decrease in projected Horizon Year 2040 traffic volumes at Lenwood Road from I-15 northbound ramps to Mercantile Way, and change in trip distribution patterns. For these same reasons, the change in 2040 Horizon Year roadway segment operations shown in **Table 12**, would not change the conclusions presented in the TIA or FEIS. No new impacts were identified and no additional mitigation measures are proposed.

No changes identified above regarding new regulations, transportation plans, bus routes, or baseline and future traffic conditions that have occurred since publication of the FEIS would alter the conclusions presented in Section 4.7.2 of the FEIS. With the implementation of mitigation measures provided in Section 5.7 of the FEIS, which references Section 6 of the MSA, and Section 13 of the MSA, which clarifies additional sources of revenue that would be available to fund bicycle and pedestrian facilities, no additional impacts associated with transportation beyond those identified in the FEIS would occur and only a minor clarification to the existing MSA is provided. No additional mitigation is warranted.

3.8 LAND USE

Final EIS Setting

Section 3.8.1 of the FEIS described the regional and local settings, guidance documents and zoning, and agriculture, as summarized below.

Regional and Local Setting

The City has a population of 23,599 people and encompasses approximately 33 square miles. The City is located in the western Mojave Desert approximately halfway between Los Angeles and Las Vegas on I-15.

The Barstow Site is located at the outskirts of the City near I-15. To the south are undeveloped and vacant lands. To the east is the Stoddard Valley OHV area, which comprises 33,500 acres and is under the jurisdiction of the BLM. To the north and west, commercially developed areas surround the I-15 and Lenwood Road interchange. Businesses at the interchange include outlet malls, restaurants, and hotels. Immediately north of the Barstow Site and south of Mercantile Way are several fast food restaurants and a few undeveloped parcels. North of Mercantile Way is an outlet mall, which contains approximately 35 outlet stores and restaurants. Lenwood Road runs adjacent to the western boundary of the Barstow Site. To the west and across Lenwood Road are a hotel and the Tanger Outlet Mall (now the Outlets at Barstow), which includes approximately 40 outlet stores and restaurants.

The Barstow Site consists of three undeveloped parcels, APNs 428-171-66, 428-171-67, and 428-171-68, comprising approximately 23.1 acres of land in the southwestern portion of the City. Regional access is provided via I-15. Local access is provided by Lenwood Road. The topography of the property consists of flat, open terrain.

Guidance Documents and Zoning

Land use planning and development for the Barstow Site is guided by the City of Barstow General Plan Community Development Element, Lenwood Specific Plan (LSP), City of Barstow Zoning Ordinance, and the applicable Redevelopment Plan. While local land use policies would not apply to lands taken into federal trust, impacts to the community may occur in terms of a federal project's relation to growth and development visions as described in these guidance documents.

The Barstow Planning Area is the geographical area addressed by the Barstow General Plan and extends beyond the City limits as shown on Figure 3.8-1 of the FEIS. The Barstow Planning Area encompasses over 208 square miles, and consists of the Corporate Area, Sphere of Influence, and Area of Interest. The Barstow Site is within the Barstow Corporate Area, which includes incorporated areas of Barstow and is developed according to the General Plan, City Zoning Ordinance, and applicable Specific Plans as discussed below. The Barstow Site is designated as Visitor-Serving Commercial, which is intended to provide retail and service facilities for persons traveling along nearby highways. The General Plan contains eight elements, including the Community Development Element and the Recreation and Open Space Element.

The Community Development Element addresses the general distribution, location, and intensity of land uses proposed for the City. Additionally, this element addresses landscaping and entryways to the City. The western part of the Barstow Site is in an area identified for expected growth. The outlet mall and retail development in this area are designated for expansion. Several points around the City are marked as entryways to the community.

The Barstow Site is near an area marked for proposed signage and design for an entryway concept (along I-15 for northbound travelers, 150 feet before Lenwood Road). The western part of the Barstow Site contains a Flood Designated Area overlay.

The Open Space and Recreation Element addresses the comprehensive and long-range plan for preservation and conservation of open space. There are no designated recreation or open space areas on the Barstow Site. An area parallel to Mercantile Way north of the Barstow Site is identified as a recreation corridor and areas just east are identified as OHV areas on the Open Space/Recreation Plan Map.

The Barstow Site is located within the LSP Boundary. As shown on Figure 3.8-2 of the FEIS, the Barstow Site is designated as Commercial-Recreational/Transition within the LSP. Development standards and criteria are contained in Section 3.0 of the LSP. The Barstow Site is located within a transitional area. Development within transitional areas requires a conditional use permit to ensure compatibility with the adjacent OHV areas and to ensure the property has adequate provisions for water, sewer, electricity, gas, telephone, and storm drainage. Commercial development in a transitional area requires that connection to a public sewer system be financed and constructed by the property owners.

The Barstow Site is zoned as Specific Plan on the City of Barstow Zoning Map as shown on Figure 3.8-3 of the FEIS. Minimum lot size, setbacks, and maximum heights for areas zoned as Specific Plan are contained within Section 3.0 of the LSP.

The City has two Redevelopment Areas for which plans were developed to address blight. The Barstow Site is within Redevelopment Project Area 1. The objective of the Redevelopment Plan is to eliminate or alleviate blight conditions including: inadequate/obsolete design, irregularly shaped and inadequately sized lots, declining property values, and economic maladjustment. The Redevelopment Plan includes design guidelines related to mechanical screening, design integration of new structures, exterior elevations of new buildings, exterior lighting, and fencing materials.

Agriculture

The California Department of Conservation map of important farmland shows the Barstow Site as an area of potential grazing land. The areas most likely to serve agricultural areas in the Barstow Planning Area are north of the City along the Mojave River. Even this area is not viable for agriculture due to extensive water needs. The General Plan does not anticipate continuation of agricultural uses and prioritizes water conservation over loss of agricultural lands. The Barstow Site does not contain prime farmland, unique farmland, or farmland of Statewide or local importance. Furthermore, there are no agricultural uses and there are no existing Williamson Act contracts on the Barstow Site.

Final EIS Impacts and Mitigation Measures

Alternative A would result in approximately 23.1 acres of land being removed from the City's land use jurisdiction and placed into federal trust for the Tribe. Once the property is taken into trust, the only applicable land use regulations would be federal or tribal.

However, the Tribe has entered into an MSA with the City in which they have agreed to develop tribal projects occurring on trust lands in a manner that is consistent with the Barstow Municipal Code and to adopt building standards and codes no less stringent than those adopted by the City prior to the use of any structure (Appendix D of the Draft EIS).

Land Use Plans

City planning documents in effect for the Barstow Site include the City of Barstow General Plan, LSP, City of Barstow Zoning Ordinance, and the applicable Redevelopment Plan. The Barstow Site is located in an area designated as Commercial-Recreational/Transition in the LSP boundary. Construction of the casino, hotel, and associated amenities would not conflict with the planned recreational intent of the area.

Development standards incorporated into Alternative A would not substantially conflict with the City's standards, including permitted uses, parking standards, outdoor storage and loading area requirements, utilities and lighting requirements, sign standards, architectural/building standards, and guidelines for accessory structures. These development standards would be integrated by the final design phase of Alternative A. Buildings would be set back at least 50 feet from Lenwood Road. Light fixtures would not extend above 30 feet in height, and the lighting would be designed to confine direct rays to the premises. Signage would be architecturally compatible with the buildings, and would be of appropriate size and content, in accordance with the guidelines set forth in the LSP. As shown in the architectural rendering, it is anticipated that the design materials and colors would be a neutral tone and blend with the surrounding environment. Development of Alternative A would be generally consistent with local land use plans.

Effects to Existing Land Uses

The Barstow Site consists of vacant and undeveloped land and there are no uses that would be disrupted by the construction of a casino/hotel resort. The Stoddard Valley OHV area is located east of the Barstow Site. Alternative A would not severely impact the OHV area, as commercial development consisting of a retail outlet mall already exists along its western boundary. The hotel component of the development would benefit large events at the OHV area. Operation of Alternative A would not preclude the recreational use of the OHV area. Because noise and nighttime lighting are generated by the OHV area, it would be unaffected by any noise or light emitted by development of Alternative A.

Development surrounding the Barstow Site to the north and west consists of hotels, restaurants, and outlet malls primarily serving as highway-related commercial uses. Alternative A would be complementary to these existing commercial uses. Lands to the south are designated as Commercial-Recreational/Transition and thus would be developed in the future with uses compatible with the Barstow Site. Alternative A would not disrupt neighboring land uses, prohibit access to neighboring parcels, or otherwise conflict with neighboring land uses and thus would have no adverse effects on existing land uses.

Agriculture

Alternative A is located on land designated for future commercial or recreational uses; it does not contain prime or unique farmlands, or farmland of Statewide importance. There are no issued or identified Williamson Act contracts on the Barstow Site. Development of Alternative A would have no adverse effects on agriculture.

Mitigation Measures

The following conditions of the MSA that addressed land resources was provided in Section 5.1 of the FEIS for the Barstow Site.

In accordance with Section 2 of the Tribe's MSA with the City, the Tribe has agreed to enact laws applicable to the trust lands and shall require that all tribal development projects on the trust lands shall be used and developed in a manner that is consistent with the Barstow Municipal Code in effect at the time of any project development.

The Tribe has also agreed to adopt building standards and codes no less stringent than those adopted by the City and prior to the use of any structure provide the City, at the Tribe's expense, written certification from the project's architect of record that said structures have been constructed in accordance with said standards and code provisions. Further, the Tribe has agreed to ensure compliance with the City's adopted codes including those pertaining to building standards and to contract with the City to provide planning, building and safety, fire prevention, and public works personnel to review any and all construction plans and inspect construction of all improvements on or off the trust lands. With the incorporation of the MSA provisions identified above, development of Alternatives A and B would result in minimal direct, indirect, and cumulatively considerable adverse effects to land resources.

Changes to the Environmental and Regulatory Setting

The regional setting of the City remains generally unchanged with the exception of the area, which has increased from approximately 33 miles to approximately 40 miles (City, 2022b), and population, which has increased from 23,599 to 25,202 people (California Department of Finance, 2022a). The Stoddard Valley OHV area is generally the same as described in the FEIS; however, according to the BLM website, the area encompasses 53,000 acres of open riding area, which is greater than the area of 33,500 acres referenced in the FEIS (BLM, 2022). The surrounding land uses are essentially the same as described in the FEIS, with a few updates to the surrounding outlet malls. The Tanger Outlet Mall is now the Outlets at Barstow, with 35 outlet stores. The Barstow Outlet is closed; however, there are several restaurants along Lenwood Road and the former outlet buildings and parking lots remain. There is no change to the undeveloped condition of or access to the Barstow Site. There is also no change to the status of or impacts on agricultural land.

Barstow General Plan

The City of Barstow General Plan was revised in February 2015. The General Plan is the overarching guide in implementation of the Development Code, which defines development regulations and established zoning districts throughout the City (City, 2022c). The General Plan includes the following six elements: Land Use, Circulation, Housing, Noise, Resource Conservation and Open Space, and Safety. Relevant to the discussion of Land Use is the Land Use Element and Resource Conservation and Open Space (Open Space).

Land Use Element

Some of the significant changes in land use designations and policies since the 1997 General Plan that are relevant to Alternative A include the following (City, 2015c):

- The removal of the Specific Plan land use designation and greater specificity of land use designations throughout the planning area
- A Master EIR that analyzes the impacts of development expected to occur within the 2015-2020 time horizon and mitigation measures to streamline environmental and development review

As shown on Exhibit L-1, Land Use Designations of the General Plan, the General Plan Land Use designation of the Barstow Site is General Commercial (GC). The GC designation includes the development standards of 50% lot coverage and a maximum of building height of 35 feet. This single land use designation for commercial land uses maximizes the flexibility of the types of commercial land uses allowed.

While some commercial centers are likely to serve primarily local customers and others may be geared toward highway travelers, all of these uses can be accommodated within the GC land use designation (City, 2015c).

The Barstow Site is shown as Site 3 on Exhibit L-2, Likely Development Sites, and is described as follows:

The long-awaited Indian casino is considered likely to be built at this location, comprised of 88,500 square feet of gaming, 160 hotel rooms, two full-service restaurants, one drive through restaurant and various retail shops. Recent developments, including publication and certification of a federal environmental document for this project, provide optimism that the casino may, in fact, be built by 2020.

Site 5, which is adjacent to existing commercial development near the Barstow Site is described as follows:

This potential development site consists of lands on both sides of the I-15/Lenwood Road interchange owned by The Plies Companies that have yet to be developed. While specific proposals for development have yet to be submitted, the General Plan environmental analysis includes assumptions of 50,000 square feet of restaurant use, 300,000 square feet of hotel space and 100,000 square feet of retail uses in the vicinity of these locations.

The Land Use Element includes various goals, policies, and strategies to: promote well-planned development patterns; ensure an aesthetically pleasing appearance to the community; improve the downtown core as a viable and attractive destination for tourists; enhance the prosperity and economic vitality of Barstow; encourage the establishment and expansion of museums, art galleries, and historical sites; and support the annexation of unincorporated lands (City, 2015c).

Resource Conservation and Open Space Element

As shown on Exhibit RC-5, Open Space, of the Recreation Conservation and Open Space Element, the area north of the Barstow Site along Mercantile Way is identified as Pipeline Open Space. As shown on Exhibit RC-6, Recreation Plan Map, a large area east of the Barstow Site is identified as an OHV area (City, 2015a).

Zoning Ordinance

In July 2015 the City completed a comprehensive zoning ordinance (Ordinance #934-2015, Title 19, Zoning) to be compatible with the General Plan. As shown on the City of Barstow Zoning Map, the Barstow Site is designated Commercial (City, 2015d).

General development standards address outdoor lighting, off-street parking, signs, landscape water conservation, alternative energy, and design guidelines (City, 2015e).

As stated in Section 19.06.060(D)(4), the following signs are permitted within the Commercial district: one freeway-oriented sign, one freestanding pylon sign up to 25 feet in height, wall signs, and electronic reader board signs.

As stated in Section 19.08.070, Commercial Development Design Guidelines include standard that incorporate: a unifying design theme; site planning; grading, drainage, and stormwater runoff; circulation; and landscaping. Regulations that govern development within the Commercial district are provided in Sections 19.16.010 through 19.16.130 and include permitted uses; uses requiring a permit; lot area; building height; front yard; rear yard; conditions of use; landscaping; parking; loading area; and signs (City, 2015e).

Redevelopment Plan

The Barstow Site is no longer located in Redevelopment Project Area 1 as redevelopment agencies were dissolved per AB 26 (ABX1 26, Chapter 5, Statutes of 2011, First Extraordinary Session), which was signed into law on June 28, 2011. The Barstow Redevelopment Agency was dissolved effective February 1, 2012 and the City was established as the Successor Agency to oversee the dissolution process (City, 2012).

Findings

Based on the information presented above, no notable changes have occurred to the regional setting, surrounding land uses, Barstow Site conditions, or agriculture uses since publication of the FEIS that would alter the conclusions presented in Section 4.8.1 of the FEIS. Although the Redevelopment Plan and LSP no longer apply to the Barstow Site, relevant development standards that address the provision of utilities, building heights and setbacks, lot coverage, building elevations, signs, design, and lighting, have been incorporated in the updated zoning ordinance, described above. Although the General Plan and zoning ordinance have been updated since publication of the FEIS, the General Plan land use designation of GC and corresponding zoning designation of Commercial is substantially consistent with the previous General Plan land use and zoning designations. Furthermore, Alternative A is anticipated for future development in the General Plan. In addition, Section 2 of the MSA would ensure compliance with City ordinances, including current code provisions and construction plans would be reviewed by the planning, building and safety, public works, and other City departments. Also, the surrounding General Plan land use designations are similar to those previously analyzed in the FEIS. Therefore, no additional impacts associated with land use beyond those identified in the FEIS would occur and no additional mitigation is warranted.

3.9 PUBLIC SERVICES

Final EIS Setting

Water Supply

As described in Section 3.9.1 of the FEIS, water in the vicinity of the Barstow Site is supplied by the Golden State Water Company (GSWC) and private groundwater wells. The Barstow Site does not have a connection to GSWC. The nearest water line is a 16-inch line that runs along the west side of Lenwood Road and terminates at Mercantile Way, just north of the Barstow Site. The MWA aids in the recharge of groundwater, due to the overdraft condition of the Mojave Basin.

A private groundwater well on the northeast portion of the Barstow Site served a former resident and is no longer in use. In 1996, the water level for this well was measured at 280.25 feet below ground surface. The Barstow Site is located in GSWC Region 3, which serves Los Angeles, San Bernardino, Imperial, and Orange counties and contains 21 separate water systems.

Within Region 3, the Barstow Site is located in the Barstow Customer Service Area, which is part of the Mountain/Desert District. The Barstow Customer Service Area supplies water to approximately 8,910 customers through their groundwater well system, which is pumped from the Mojave River Basin-Centro Sub-basin, where groundwater is allocated subject to adjudication decisions. The Barstow Customer Service Area consists of 17 active groundwater wells and a 1.0-million-gallon reservoir, which provide approximately 600 gpm on average. The wells have a current total active capacity of 16,147 acre-feet per year (ac-ft/yr). Actual pumping averaged 9,556 ac-ft/yr between 2000 and 2004. The GSWC has three licenses from the SWRCB that allows GSWC to pump a maximum of 14,479 ac-ft/yr.

The MWA is responsible for water resource management in areas of the High Desert in the County. The boundaries of the MWA include the Barstow Site. The MWA is a State water contractor with access to the State Water Project and serves as watermaster, settling overdraft issues in the Mojave Basin. The State Water Project delivers water from the Sierras via the California Aqueduct. The MWA connects to the California Aqueduct via the MWA Mojave River Pipeline. There are three recharge sites near Barstow: the Hodge, Lenwood, and Daggett/Yermo sites. At these locations, groundwater is recharged to compensate for overdraft conditions. The MWA is entitled to receive an annual allotment of 75,800 ac-ft/yr from the State Water Project. Due to overdraft conditions in the Mojave River Basin, the City and Southern California Water Company filed a lawsuit in 1990 to guarantee water from upstream users. The result of this judgment was the establishment of Free Production Allowances (FPA) for water producers. Water produced in excess of the FPA must be replaced by the producer through payment to the MWA to purchase replacement water or through transfer of unused FPA from another producer.

Wastewater Service

As described in Section 3.9.2 of the FEIS, the Barstow Site is not currently connected to a public wastewater system. The nearest trunk sewer lines are located on Mercantile Way, less than 1 mile north of the Barstow Site. Currently peak wastewater flow to the City facility is 2.7 million gallons per day (mgd). The wastewater treatment plan has a capacity of 4.5 mgd of average daily wastewater flow and a peak flow of 7.6 mgd. The wastewater treatment plant provides primary and secondary treatment. Treated effluent is disposed to effluent percolation ponds with a capacity of 3.0 mgd. During peak flows, wastewater is treated and then metered out to the effluent percolation ponds so that capacity is not exceeded. Sludge from the secondary treatment system is dried and hauled offsite to a composting facility.

Solid Waste Service

As described in Section 3.9.3 of the FEIS, solid waste and recycling in the City is collected by Burrtec Waste Industries, Inc., the City's authorized contract hauler. Solid waste is hauled to the Barstow Landfill. The City has a single stream recycling collection for residential and commercial customers. Bins are provided for co-mingled recyclables. Recyclables are hauled to the Material Recovery Facility in Victorville, where they are sorted and processed.

The Materials Recovery Facility accepts mixed paper, glass and beverage containers, plastics, cans, and scrap metals. The last approved diversion rate for the City was 62% in 2006. The Barstow Landfill accepts non-hazardous waste including construction/demolition, agriculture, industrial, sludge, and mixed municipal waste.

The permitted capacity is 750 tons per day (tpd), including 150 tons of liquid from sewage ponds. As of March 2007, the 47-acre landfill had a remaining capacity of 924,401 cubic yards and a life expectancy of 2012. The EIR to operate and expand the landfill to a 331-acre site was certified in October 2009. After expansion of the landfill, the permitted daily limit would be 1,500 tpd; the landfill is predicted to last until 2070.

Energy

As described in Section 3.9.4 of the FEIS, Southern California Edison (SCE) provides electricity to approximately 13 million people and has a service area of approximately 50,000 square miles, including the City. Energy sources include fossil fuels, natural gas, hydroelectric power, nuclear energy, and renewable resources. The former residence on the Barstow Site was served by SCE. Overhead 12 kilovolt lines remain along the northern portion of the Barstow Site and continue on to the Barstow Site short of the eastern boundary.

Southwest Gas Corporation provides natural gas services to the City. Southwest Gas Corporation (SGC) is an investor-owned utility with 1.7 million customers in Arizona, Nevada, and California. SGC had a throughput of 2.4 billion therms in 2007. The nearest gas line is a 4-inch diameter line located along Lenwood Road, adjacent to the eastern boundary of the Barstow Site.

Law Enforcement

As stated in Section 3.9.5 of the FEIS, the Barstow Police Department (BPD) provides law enforcement services within the City limits, which encompasses approximately 40 square miles and has a service population of 23,000. BPD is funded through the City budget. The main station is located at 220 East Mountain View Street and houses the patrol, records, dispatch, and evidence functions. An annex located at 500 Melissa Avenue in Barstow houses the investigative and code enforcement bureaus, as well as the crime analysis and training functions.

At the time of the FEIS, there were 40 sworn staff police officers assigned black and white police vehicles. Non-sworn staff are assigned to records, dispatch, code enforcement, and crime analysis. The Department had a 10-member Special Response Team (SRT) which was staffed with 8 officers at the time of the FEIS. The Department had 11 patrol vehicles, an evidence/crime scene van, an SRT van, eight unmarked vehicles, one volunteer vehicle, and three code enforcement vehicles.

Calls are assigned on a seniority rotation. Patrol is staffed at one sergeant and four officers per shift. The desired response times are 5 minutes for Priority 1 calls and 20 minutes for non-critical calls. Average response times vary from 3–8 minutes. Based on traffic and conditions, drive time from the main station to the Barstow Site on I-15 may take as long as 15 minutes.

BPD handled 33,683 calls for service (approximately 90 per day) in 2005. In 2005, there were 5,714 police reports filed and 2,368 arrests. A summary of reported crimes for 2007 is provided in Table 3.9-1 of the FEIS and presented as **Table 13** herein.

TABLE 13. CITY OF BARSTOW CRIME 2005

Crime	Number of Incidents
Homicide	3
Rape	21
Robbery	72
Assault	241
Burglary	402
Larceny Theft	621
Motor Vehicle Theft	186
Arson	15
Total	1,561
Source: Federal Bureau of Investigation, 2007.	

The Sheriff’s Department provides mutual aid assistance on request. The Sheriff’s Department has a Desert Rescue Squad, which provides search and rescue services in the high desert. California Highway Patrol (CHP) is the primary law enforcement for State-owned facilities in the City and traffic enforcement on freeways. CHP also provides mutual aid assistance on request.

Fire Protection and Emergency Medical Services

As stated in Section 3.9.6 of the FEIS, the Barstow Fire Protection District (BFPD) provides fire prevention, fire safety, and paramedic services to the City and surrounding County areas within BFPD boundaries. The service area is 60 square miles and includes the City and the communities of Lenwood, Grandview, North Barstow, and Barstow Heights. BFPD also plans to provide service to areas corresponding to City annexations. BFPD is a Self-Governed Special District that has Automatic and Mutual Aid Agreements with San Bernardino County Fire, Marine Base Fire (U.S. Department of Defense), Fort Irwin Fire, and with volunteer departments in Daggett, Yermo, and Newberry.

BFPD operates two stations: Stations 361 and 363. Fire Station 363 is the nearest station to the Barstow Site and would provide primary response. Station 363 is located at 2600 West Main Street approximately 4 miles northeast of the Barstow Site. Station 363 is equipped with two ICS Type-1 fire engines. Fire Station 361 could also provide service to the Barstow Site and is located at 861 Barstow Road. Station 361 is equipped with one quint truck with a 75-foot aerial ladder, three ICS “Type-1” fire engines, and one water tender. BFPD has one paramedic engine per station, staffed with three full-time personnel. BFPD’s target response time is 5 minutes or less to 90% of calls, and the current average response is approximately 8 minutes. In 2008, BFPD responded to 4,200 calls for service. To aid in fire suppression, projects within BFPD boundaries are required to meet minimum fire flows per the 2000 Uniform Fire Code and 2001 California Fire Code (Carrao, 2006).

BFPD also responds to emergency medical service (EMS) calls. Ambulance service is provided by Desert Ambulance located at 831 West Main Street.

As stated in Section 3.9.6 of the FEIS, the nearest emergency room is located at Barstow Community Hospital (555 South 7th Street), which is approximately 5 miles northeast of the Barstow Site. Emergency air services are provided by Mercy Air for all emergencies requiring transport to a trauma center. The nearest trauma center is Arrowhead Regional Medical Center, located approximately 97 miles away in Colton, California. Should an emergency involve a heart attack or other heart condition, the victim must be transported to the ST-Elevation Myocardial Infarction (STEMI) Receiving Center at St. Mary Medical Center in Apple Valley, approximately 23 miles southwest of the Barstow Site.

Final EIS Impacts and Mitigation Measures

Water Supply

The estimated average daily water demand provided in the FEIS (Table 2-2) for Alternative A was approximately 201,000 gallons per day (gpd). In accordance with Section 8 of the MSA, the Tribe would obtain potable supply from GSWC. The GSWC wells in the Barstow Customer Service Area have a capacity of 16,147 ac-ft/yr and had an average pumping rate from 2000 to 2004 of 9,556 ac-ft/yr, with a surplus capacity of approximately 6,591 ac-ft/yr. The Barstow Customer Service Area has adequate capacity for the estimated water demands of Alternative A, which are equivalent to approximately 225 ac-ft/yr. An existing 16-inch-diameter line that runs along the west side of Lenwood Road would be extended from its current termination point and connected to the proposed facilities.

For fire flow, a fire pump and jockey pump would be located onsite to help maintain static pressure, as recommended by the BFPD. With these pumps, no on-site storage tanks would be required. As GSWC has adequate supply, service can be provided to Alternative A without affecting existing customers and without the need to construct improvements to the existing system. Alternative A would not result in adverse effects to municipal water supply systems.

Wastewater Service

Wastewater treatment would be provided by the City. The projected average daily wastewater flow provided in the FEIS (Table 2-2) was 179,200 gpd and a peak day wastewater flow of 358,400 gpd. The recommended wastewater treatment plant (WWTP) capacity to accommodate peak day flow and unusually heavy wastewater flows that may occur during special events would be 375,000 gpd. Consistent with Section 7 of the MSA, wastewater service for Alternative A would be provided by the City's WWTP. Currently the WWTP plant serving the City has a treatment capacity of 4.5 million gpd and a peak flow of approximately 2.7 million gpd. There is adequate surplus capacity to accommodate peak wastewater flows (375,000 gpd during special events) from Alternative A. The existing 10-meter sewer connection would be extended from the intersection of Lenwood and Mercantile Way to the Barstow Site. In accordance with Section 7 of the MSA, the Tribe shall pay the costs of constructing sewer infrastructure, if needed. Alternative A would not result in adverse effects to municipal wastewater services.

Solid Waste Service

Construction of Alternative A would result in a temporary increase in waste generation from excess construction materials and excavated fill. Waste that cannot be recycled would be disposed of at the Barstow Landfill, which accepts construction/demolition materials. Excavated fill material would be reused at other construction sites to the extent possible. In the most extreme case, no users would require the fill and it would be disposed of and used as cover for the Barstow Landfill.

The Barstow Landfill has sufficient capacity to accept the 71,296 cubic feet of excavated soil, which would represent 0.6% of the permitted daily intake. Construction of Alternative A would not result in significant adverse effects on solid waste services.

Operation of Alternative A would include both gaming and hotel uses. Based on these uses, the estimated amount of solid waste would be between 1,178 and 2,748 tpy (3.2 and 7.5 tpd, respectively). Bins would be provided for recycling within the proposed facilities. When the landfill is expanded, Alternative A would represent approximately 0.21%–0.50% of the landfills expected permitted daily intake. Alternative A's projected solid waste generation is considered a small contribution to the waste stream and would not dramatically decrease the life expectancy of the landfill. Alternative A would not affect County diversion goals as waste generated on tribal land is classified as out-of-state waste and is not calculated in local waste diversion statistics. Furthermore, as described in Section 5.3 of the FEIS, a Solid Waste Management Plan (SWMP) shall be adopted by the Tribe that addresses recycling and solid waste reduction onsite. The SWMP shall have at least a 50% diversion goal, which includes reduction, recycling, and reuse measures. Operation of Alternative A would not result in significant adverse effects on solid waste services.

Energy

In accordance with Section 8 of the MSA there shall be no on-site generation of electricity except for emergency power purposes. Electricity would be obtained from SCE, which maintains electrical lines along the northern boundary of the Barstow Site. The Tribe would pay a fair share of the upgrades needed to avoid affecting the service of existing customers and any infrastructure necessary to provide service to Alternative A.

Gas service would be provided by SGC, which maintains a 4-inch-diameter line along Lenwood Road. This line may need to be upgraded to provide service to Alternative A. The Tribe would pay a fair share of the improvement costs necessary to service the Barstow Site. Service to existing customers would not be affected as the Tribe would coordinate with SGC. Alternative A would not result in significant adverse effects on energy services.

Law Enforcement

In accordance with Section 4 of the Tribe's MSA, the City would provide law enforcement services including but not limited to 24-hour patrol, response to emergency 911 calls, and general investigation for major crimes. The BPD would have the authority to enforce all non-gaming State criminal laws on the proposed trust lands pursuant to Public Law 280 and Section 4 of the MSA. Additionally, an increase in service demands to CHP may result from development of Alternative A. However, payments to the State under the Tribal-State compact would offset any impacts to CHP. The Tribe would employ security personnel and provide surveillance throughout the proposed facilities. As discussed in Section 4 of the MSA, security personnel would work cooperatively with BPD. The Tribe would make payments to the City to cover the costs of impacts associated with increased police services. The Tribe has also agreed in Section 4 of the MSA, upon request of the City, to dedicate land for fire and police station use and pay for a portion of new fire and police stations.

With implementation of the conditions of the MSA, as discussed in Section 5.9 of the FEIS, development of Alternative A would not result in significant adverse effects on law enforcement services.

Fire Protection and Emergency Medical Services

During construction, equipment used for grading and construction activities may create sparks which could ignite dry grass. Environmental protection measures like ensuring all dried vegetation is cleared away from staging and building areas where spark-producing equipment would be employed to reduce the potential risk of fire. Development of Alternative A would not result in significant adverse effects on fire protection and EMS during construction. Specific BMPs presented in Section 5.9 of the FEIS would further reduce identified adverse effects.

Alternative A would increase the number of visitors in the project area, which would result in the need for increased fire protection and EMS. The fire protection facilities onsite would be fitted with automatic fire sprinkler systems. Timely detection of fires and early intervention of any fires would be achieved with the use of 24-hour surveillance. As recommended by BFPD, a fire pump and jockey pump would be located onsite to help maintain static pressure.

As agreed upon in the Tribe's MSA with the City, BFPD would provide fire protection and EMS to the Barstow Site. In accordance with Section 4(B)(1) of the MSA, the Tribe would compensate the City for the purchase of a fully equipped EMS response vehicle which shall be housed at Station 363 for the first two years of casino-hotel operations. To respond more effectively to high-rise emergencies at any structure on trust lands between one and four stories, the BFPD has agreed to relocate its ladder fire truck from Station 361 to Station 363 for the first two years of casino-hotel operation, as identified in Section 4(B)(2) of the MSA. The BFPD and the City have advised that a ladder truck is not typically used to fight fires on buildings more than four stories in height and that buildings over four stories in height require entry by Fire Department personnel and personal action at the burning site. If a structure exceeding four stories in height is constructed by the Tribe on trust lands, the Tribe has agreed to pay one half of the actual costs of training fire personnel. In Section 4(C) of the MSA, the Tribe has also agreed to dedicate or arrange for the dedication of 2 acres of non-federal land near the Barstow Site owned or controlled by the Tribe or its developer for fire or police station use. This dedicated land would be used by the City to construct new fire and police stations when, and if, deemed necessary by the City in its sole discretion.

The nearest emergency room is located at the Barstow Community Hospital at 555 South 7th Avenue in Barstow. EMS services, including ambulance transport and emergency room care, are provided by private businesses and usually paid for by the person requiring emergency medical care. With implementation of the conditions of the MSA, as discussed in Section 5.9 of the FEIS, development of Alternative A would not result in significant adverse effects on fire protection and EMS.

Changes to the Environmental and Regulatory Setting

Water Supply

Since Alternative A and corresponding water demand presented in Table 2-2 of the FEIS would not change (except to decrease due to more water efficient fixtures and more stringent regulations), impacts from Alternative A on water supply would not result in adverse effects to the municipal water supply.

GSWC supplies water to approximately 8,800 residents within the City through their groundwater well system, which is pumped from the Mojave River Basin-Centro Sub-basin (GSWC, 2022). As discussed in **Section 3.2**, the GSWC prepared an UWMP for the Barstow Service Area to demonstrate water reliability

in a normal year, single dry year, and droughts lasting five consecutive years through 2045. As presented in Tables 5-2 and 5-3 of the UWMP, during all scenarios service area demand would exceed service area demand, due to GSWC's active management of its water supply portfolio and Water Storage Contingency Plan. As shown in Table 5-3 of the UWMP, even under a five consecutive dry year scenario, the service area supply of 12,862,631 gallons-per-day (gpd), would exceed the projected service area demand of 5,191,296 gpd by 7,671,334 gpd (GSWC, 2021).

Alternative A estimated water demand was approximately 201,000 gpd. In accordance with Section 8 of the MSA, the Tribe would obtain potable supply from GSWC. The Barstow Customer Service Area has adequate capacity for the estimated water demands of Alternative A, which are equivalent to approximately 225 ac-ft/yr.

Section 13.40 of the Barstow Code of Ordinances details the City's Water Conservation Plan. Section 13.40.050. states that all new developments must provide low-flush toilets, as per California Health and Safety Code § 17921.3, low-flow showers, when applicable, and faucets, as per Title 24, Part 6, Article 1, T20-1406F of the California Administrative Code. In addition, all hot water lines must be insulated, according to State energy commission regulations (City, 2015e). In accordance with Section 2 of the MSA, the Tribe would comply with all applicable City Ordinances in effect at the time of Project development.

Wastewater Service

Section 13.12.500 of the City of Barstow's Code of Ordinances requires any Class I, II, III, or IV users to apply for a permit issued by the City's building department. A certificate of occupancy and inspection by the industrial pretreatment division is required to determine if a discharge permit is necessary (City, 2015e). Per Section 2 of the MSA, the Tribe would comply with all applicable City Ordinances in effect at the time of Project development. The recommended wastewater treatment plant (WWTP) capacity to accommodate peak day flow and unusually heavy wastewater flows that may occur during special events would be 375,000 gpd. Consistent with Section 7 of the MSA, wastewater service for Alternative A would be provided by the City's WWTP. Currently the WWTP plant serving the City has a treatment capacity of 4.5 million gpd and an average daily flow of approximately 2.1 million gpd (CRWQCB, 2019). There is adequate surplus capacity to accommodate peak wastewater flows (375,000 gpd during special events) from Alternative A.

Solid Waste Service

The Barstow Landfill has a permitted capacity of 1,500 tpd, which is an increase above the 750 tpd stated in the FEIS. The landfill has nearly 71 million cubic yards of available capacity and is estimated to have sufficient capacity to maintain operations until 2071 (CalRecycle, 2019). The solid waste generated by Alternative A would represent a negligible percentage of the permitted daily capacity of the Barstow Landfill.

Article VIII of the Code of the City of Barstow's Commercial/Industrial Collection § 6.20 pertains to commercial solid waste. This ordinance states that all commercial businesses must conform with the provisions of the chapter, including mandated minimum once-a-week collection, maintenance and placement of containers, and the separation of recyclables, organic matter, and solid waste designated for the landfill. In accordance with Section 2 of the MSA, the Tribe would comply with all applicable City

Ordinances in effect at the time of Project development.

Energy

SCE provides electricity and SGC provides natural gas to the Barstow Site. SCE serves 15 million people within an approximately 50,000 square-mile area (SCE, 2022). No significant changes to Alternative A's electricity provider, location of existing facilities, or projected usage have occurred since publication of the FEIS.

No changes to Alternative A that would alter the conclusions of the FEIS or modify the recommended mitigation measures in the FEIS for the 2022 Approved Project.

According to Southwest Gas Holdings, gas purchase contracts covered approximately 236 million dekatherms in 2018 (SGC, 2018). No significant changes to Alternative A's natural gas provider, location of existing facilities, or projected usage have occurred since publication of the FEIS. The implementation of Alternative A would result in a less-than-significant impact to electricity and natural gas services demand.

Law Enforcement

As discussed in Section 3.9.5 of the FEIS, the Barstow Site is within the jurisdiction of BPD. Tribal security personnel would work with BPD to provide general law enforcement services to the Barstow Site. BPD would have the authority to enforce all non-gaming State criminal laws on the proposed trust lands pursuant to Public Law 280 and Section 4 of the MSA. The planned modifications would not create any significant changes to law enforcement service in the area that would alter the conclusions in Section 4.9.1 of the FEIS. No new studies since the publication of the 2014 FEIS have been published that would suggest that casinos are correlated with an increase in crime within the County. Therefore, the impacts of Alternative A to public law enforcement services would remain less than significant.

According to the City's General Plan and BPD's website, BPD has 58 total personnel (40 sworn officers and 18 unsworn positions) (BPD, 2023). The BPD equipment inventory lists 15 marked patrol cars, 11 unmarked vehicles, 1 crime scene van, 1 armored vehicle, 1 SWAT van, 1 Citizen on Patrol vehicle, 1 marked police truck, and 2 marked police motorcycles. (City, 2015). The BPD handled 31,695 calls for service in 2013. The BPD made 2,725 arrests. The average Police Department response time for Priority 1 calls was 7 minutes and 32 seconds (City, 2015). Compared to the information presented in the FEIS, the overall number of calls for service has decreased, while the number of arrests has increased. Regarding response times, this is similar to the average response time of 3-8 minutes presented in the FEIS.

Current crime data compared to **Table 13** is provided in **Table 14** below based on current statistics available on the BPD's website (BPD, 2022). As indicated in this table, the overall number of crimes has substantially decreased compared to the 2007 data presented in the FEIS.

TABLE 14. CITY OF BARSTOW CRIME 2022

Crime	Number of Incidents
Homicide	6
Rape	10
Robbery	53
Assault	207
Burglary	167
Larceny Theft	238
Motor Vehicle Theft	183
Arson	--
Total	864
Source: Barstow Police Department, December 2022.	

Fire Protection and Emergency Medical Services

The BFPD serves approximately 48,000 people, over 60 square miles from two separate fire stations: Stations 361 and 363 (BFPD, 2019). BFPD has 26 full-time personnel: 1 fire chief, 6 captains, 6 engineers, 3 firefighters, 6 firefighter-paramedics, 3 limited term firefighters, and 1 office assistant (non-sworn). The BFPD operates 2 full-time paramedic engine companies and 1 paramedic squad. The paid-call members operate an engine, truck- company and a water tender. In additions, the District owns 3 staff vehicles. BFPD’s response time varies, and can range from seconds, if located near one of the two stations, to up to nine minutes in rural locations (City, 2015f) This is an increase from staffing levels identified in the FEIS with similar equipment levels. While responses vary, the temporary relocation of the BFPDs’s ladder fire truck from Station 361 to Station 363, dedication of land, and purchase of a new EMS response vehicle would also occur as part of the MSA (refer to Appendix D of the Draft EIS) and would ensure adequate fire protection.

The nearest trauma center is Arrowhead Regional Medical Center, located approximately 55 miles southwest of the Barstow Site, as opposed to the 97 miles incorrectly stated in the FEIS.

Findings

No changes identified above regarding water supply, wastewater service, solid waste service, energy, law enforcement, fire protection and EMS due to the passage of time would alter the conclusions presented in Section 4.9.1 of the FEIS. With the incorporation of regulatory requirements, BMPs, and the MSA, described in Chapter 5.0 of the FEIS and Appendix D of the Draft EIS, no additional impacts associated with public services beyond those identified in the FEIS would occur and no additional mitigation is warranted.

3.10 NOISE

Final EIS Setting

As described in Section 3.10.3 of the FEIS, the Barstow Site is primarily open and undeveloped, but several

sources of noise are located in the immediate vicinity. Noise from traffic on I-15 and activities associated with the Tanger Outlet Mall (now the Outlets at Barstow) and several retail establishments (fast food and hotels) all contribute to an existing daytime ambient noise level in the area. Based on existing day and night time activity and the proximity of noise sources to the Barstow Site, it was estimated that the day/night ambient noise level in the vicinity of the Barstow Site was between 55 to 65 day-night average sound level, decibels (dBA) or approximately 65 community noise equivalent level (CNEL). The nearest sensitive receptor to the Barstow Site was a hotel located approximately 600 feet west of the Barstow Site. The nearest residence was located approximately 1 mile west of the Barstow Site, and Lenwood School was located approximately 2 miles northwest of the Barstow Site.

Final EIS Impacts and Mitigation Measures

Impacts associated with noise for the Barstow Site are described in Section 4.10 of the FEIS. As stated therein, construction activities associated with Alternative A could result in maximum noise levels ranging 70 to 90 dBA at a distance of 50 feet. While construction activities would be temporary in nature and would generally occur between the hours of 7:00 a.m. and 6:00 p.m., mitigation was provided in Section 5.10 of the FEIS which would limit the schedule of construction activities and provide engineering controls to reduce construction noise. Therefore, with mitigation, Alternative A would not result in significant adverse effects associated with noise due to construction.

Alternative A would also result in operational noise from parking lot activity, use of heating, ventilation, and air conditioning (HVAC) equipment, truck loading and unloading, tour buses, and off-site traffic increases. As described in Section 4.10.1 of the FEIS, the increase in ambient noise level at the nearest sensitive receptor from parking activities, HVAC units, and truck loading would not be audible; thus, no adverse effect would occur. It was determined that tour buses parked and idling on the Barstow Site could be an additional source of noise if allowed to idle for long periods adjacent to noise receptors. Therefore, mitigation measures were provided in Section 5.10 of the FEIS to prohibit lengthy idling time. Accordingly, the FEIS determined that due to the distance of Alternative A to the nearest sensitive receptor, with proposed mitigation, development of Alternative A would not result in significant adverse effects related to on-site operational noise.

The FEIS determine that the increase in ambient noise levels as a result of Alternative A traffic on Lenwood Road would not exceed the Federal Highway Administration exterior noise threshold of 72 equivalent sound units, dBA for hotel land uses. Additionally, the FEIS determined that the noise level at the nearest sensitive receptor would be approximately 64.4 CNEL dBA, which would not exceed the City's noise standard of 65 CNEL. Therefore, traffic generated by Alternative A would not exceed the federal, State, or local noise standards. A less than significant adverse effect to the noise environment would occur.

Changes to the Environmental and Regulatory Setting

Since publication of the FEIS, the conditions on the Barstow Site remain substantially unchanged. No additional development has occurred in the immediate vicinity of the Barstow Site that would increase the noise levels in the surrounding area or result in the addition of new sensitive receptors.

Findings

Based on the information presented above, no changes have been identified for the environmental or

regulatory setting. The FEIS determined that with the incorporation of the MSA provisions presented in Appendix D of the Draft EIS/EIR, and regulatory requirements and BMPs presented in Sections 5.1 and 5.2 of the FEIS, development of Alternative A would result in minimal direct, indirect, and cumulatively considerable adverse effects to noise. Therefore, no additional impacts associated with noise beyond those identified in the FEIS would occur and no additional mitigation is warranted.

3.11 HAZARDOUS MATERIALS

Final EIS Setting

As described in Appendix J of the Draft EIS, a Phase I Environmental Site Assessment (Phase I) was completed in 2003 for the Barstow Site that included background database research and a survey of the site; no Recognized Environmental Conditions (REC) were identified. New background searches were completed in 2006 and 2009 which also failed to identify RECs on the Barstow Site.

Final EIS Impacts and Mitigation Measures

Impacts associated with noise for the Barstow Site are described in Section 4.11 of the FEIS. As stated therein, there is no known hazardous materials contamination on the project site. The possibility exists that undiscovered contaminated soil and/or groundwater exist on the site. Furthermore, during construction, typical construction Best Management Practices (BMPs) limit and often eliminate the effect of such accidental releases from construction equipment. Specific BMPs presented in Section 5.11 would minimize the risk of inadvertent release and, in the event of a contingency, minimize adverse effects. With these measures, Alternative A would not result in significant adverse effects associated with hazardous materials during construction. As noted for operation, the majority of waste produced would be non-hazardous. Diesel fuel storage tanks would be needed for the operation of emergency generators at the casinos and fire pumps at the hotels. Fuel tanks would be housed above ground within the individual generator units. The storage tanks would have double walls with integrated leak detection systems. These self-contained diesel fuel storage tanks would reduce the likelihood of release of a hazardous material. As discussed in Chapter 2.0 of the FEIS, BMPs have been incorporated into project design to reduce the potential for inadvertent release of hazardous materials. BMPs in Section 5.11 of the FEIS would minimize the risk of inadvertent release and, in the event of a contingency, adverse effects.

Changes to the Environmental and Regulatory Setting

There have been no significant changes to the regulatory setting for hazardous materials. To assess the setting, the SWRCB GeoTracker database and the California Department of Toxic Substances Control (DTSC) EnviroStor database were reviewed to determine whether any new hazardous material releases may have been reported since the analysis in the FEIS was conducted and the Phase I was prepared (SWRCB, 2022b; DTSC, 2022).

The EnviroStor Database did not include information on any hazardous materials sites within 1 mile of the Barstow Site. The SWRCB GeoTracker database noted five leaking underground storage tank (LUST) sites within 1 mile that have been closed, and a LUST at the Flying J Travel Center located approximately 0.4 miles north which was reported in 2018 and is still active. No hazardous materials reports included the Barstow Site.

Findings

Because no new environmental conditions relating to releases of hazardous materials have been identified in the immediate vicinity of the Barstow Site since the FEIS was issued and there is no indication of any new hazardous material releases on the Barstow Site, no significant impacts with regard to hazardous materials contamination are anticipated. No additional impacts beyond those identified within the FEIS would occur.

Therefore, with the implementation of mitigation measures in Section 5.11 of the FEIS, which include having personnel follow BMPs to reduce the potential for release of fuel, oil, and hydraulic fluids during construction and operation of Alternative A as well as measures to address any contamination encountered during earth-moving activities, impacts from hazardous materials would remain less than significant, as described in Section 4.11 of the FEIS.

3.12 AESTHETICS

Final EIS Setting

The aesthetics setting for the proposed Barstow Site is described in Section 3.12 of the FEIS. Development in the area of the Barstow Site is guided in part by the LSP which includes direction regarding landscaping, building height, lighting, and signage. Landscaping should include undulating berms and ground covers as well as trees of similar species. Light fixtures are limited to 30 feet in height and may not extend above the roofline of the building; in addition, lights must be designed to confine direct rays from the premises. Signage may not exceed 150 square feet, cannot extend above the roofline of the building, and must contain the business name as the primary message on the architecturally-compatible signage.

The viewshed described in Section 3.12 of the FEIS notes that the Barstow Site is located on the outskirts of the visually developed area of the City. The topography surrounding the Barstow Site inclines immediately to the northeast and to the southwest, and while upland areas also occur further south, they are not within the immediate viewing area of the Barstow Site. Views from residences is limited to partial views from a small number of residences located approximately 1.8 to 3.5 miles away that are obstructed by commercial and retail developments.

With regard to scenic highways, no State- or County-designated identified scenic highways are located adjacent to the Barstow Site, however a portion of I-15 that extends from SR-58 near Barstow to SR-127 near Baker, California is eligible for designation as a State Scenic Highway (California Department of Transportation, 2022).

Final EIS Impacts and Mitigation Measures

While the development of Alternative A would represent a change to the viewshed, and would be visible from several vantage points, the existing commercial and industrial development would serve to reduce the intensity of Alternative A's visual impacts. The hotel and casino complex would be designed to create positive visual effects and would avoid architectural features that may be especially incompatible with a non-urban setting. No local or State-designated scenic corridors would be affected by the implementation of Alternative A. Development of Alternative A would not result in significant adverse effects on visual resources.

No mitigation measures were provided in the FEIS with regards to aesthetics, however several BMPs were recommended in Section 5.12. BMPs includes the placement of floodlights so as not to cast light or glare offsite, the use of shielding to ensure the downcasting of outdoor lighting, and the use of timers to limit lighting to necessary times.

Changes to the Environmental and Regulatory Setting

The immediate area surrounding the Barstow Site remains largely unchanged. The overall area is developed with a variety of commercial and retails uses including restaurants, stores, a large outlet mall, gas stations, and hotels.

Findings

The conditions of the Barstow Site remain unchanged. Based on the lack of significant development in the project area since the completion of the FEIS, impacts to aesthetics would remain consistent with the findings in the FEIS. The BMPs provided in Section 5.12 of the FEIS would still be required, however no mitigation measures or additional BMPs would be needed.

3.13 CUMULATIVE EFFECTS

Final EIS Setting

Near-Term and long-term cumulative conditions were established in the FEIS through consultation with local government agencies, including the City. Table 4.13-1 of the FEIS provided a list of the major development projects within the vicinity of the Barstow Site that were under construction or reasonably foreseeable at the time of analysis for the cumulative analysis year of 2030. Figure 4.13-1 (FEIS) identified the locations of these development projects in relation to the Barstow Site. The proposals totaled 4,990 development units and 1,748.1 thousand square feet of development.

Final EIS Impacts and Mitigation Measures

Compliance with local permitting requirements for construction of approved projects and additional development associated with planned growth would address cumulative considerable impacts from cumulatively considerable projects. It is anticipated that approved developments would follow the appropriate permitting procedures after thorough review under the California Environmental Quality Act. As discussed in Section 5.0 of the FEIS, the Tribe has agreed to enact laws applicable to the trust lands and shall require that all tribal development projects on the trust lands be used and developed in a manner that is consistent with the Barstow Municipal Code in effect at the time of any project development, reducing cumulatively considerable impacts from Alternative A.

With the implementation of mitigation for anticipated cumulatively considerable impacts associated with Climate Change and Transportation/Circulation, cumulatively considerable impacts attributable to Alternative A would be reduced to minimal levels.

Changes to the Environmental and Regulatory Setting

Based on an aerial review of the Lenwood area surrounding the Barstow Site, there has been no discernible change in the density of development surrounding the Barstow Site since completion of the FEIS. The current land use descriptions provided in **Section 3.8.3** indicate relatively little has changed in

the cumulative environmental setting since the FEIS was completed. Planned developments within the Barstow area are aligned with the City's General Plan growth expectations. There are no anticipated developments in the Barstow area that would contribute substantially to the cumulative environment or affect the determinations of the FEIS. Furthermore, the City's General Plan includes a Casino and Resort on the Barstow Site, thereby incorporating the potential cumulatively considerable impacts of the development within local planning documents.

The passage of time has indicated that various assumptions utilized in the FEIS to develop planning horizon settings, such as traffic, were conservative. Refer to the discussion in **Section 3.7** regarding current traffic volumes compared to those anticipated in the FEIS. The cumulative setting has not significantly changed and therefore the setting described in the FEIS is accurately established to assess cumulatively considerable adverse effects from the implementation of Alternative A and no changes are necessary.

Findings

Based on the lack of significant development in the project area since the completion of the FEIS, inclusion of a casino and hotel on the Barstow Site within the City's General Plan, and the protective (MSA provisions and BMPs) and mitigative measures including in the FEIS that are still applicable, impacts to the resource areas would remain consistent with the findings of the FEIS. No additional mitigation measures are warranted.

3.14 INDIRECT AND GROWTH-INDUCING EFFECTS

Indirect Final EIS Effects from Off-Site Utility Improvements

Implementation of Alternative A would require construction of roadway and utility improvements and public service structures offsite. Impacts associated with Alternative A would be mitigated through the construction of additional turn lanes within the surrounding roadway network and a traffic signal adjacent to the access point to the Barstow Site. Public utilities would need to be upgraded and extended to the Barstow Site, with the longest distance being the extension of the 10-inch diameter wastewater and water lines that currently terminate at the intersection of Lenwood Road and Mercantile Way. This extension would require the construction of approximately 800 feet of trench adjacent to Lenwood Road. Upgrades to the utility systems entail the expansion of the line system capacity and corresponding lift station capacities. Additionally, in Section 4(C) of the MSA, the Tribe has agreed to dedicate, or arrange for the dedication of, 2 acres of non-federal land near the Barstow Site for fire and police station use. Off-Site improvements are conceptual at this time. Design and construction plans would be prepared after an alternative has been selected for development and would be developed in accordance with City input.

Findings

Based on the lack of significant development in the project area since the completion of the FEIS, upgrades to public utilities and the inclusion of traffic mitigation measures recommended in the FEIS are still applicable. Therefore, impacts associated with Alternative A off-site utility and roadway improvements would be consistent with the findings of the FEIS. No additional mitigation measures are warranted.

Growth-Inducing Effects

Development of Alternative A would result in one-time employment opportunities from construction and permanent employment opportunities from operation. These opportunities would result from direct as well as indirect and induced effects. Construction opportunities would be temporary in nature, and would not be anticipated to result in the permanent relocation of employees into the County. Operational employment opportunities would potentially include employees that relocate to the area from outside of the County. Complimentary businesses such as hotels and gas stations that may be constructed as a result of the Project are already present in the vicinity of the Barstow Site.

As noted in **Section 3.6**, there is more available housing in the area and adequate unemployment to meet the needs locally for operation of Alternative A. Furthermore, with a Casino and Resort included within the General Plan, Alternative A would not result in unanticipated growth.

Findings

As noted above, based on the current socioeconomic conditions identified in **Section 3.6** and incorporation of a casino and hotel into local long-term planning (General Plan), the findings of the FEIS regarding growth-inducing impacts remain applicable to Alternative A and no additional analysis is needed.

4.0 CONCLUSION

The current conditions of the Barstow Site and surrounding community remain largely unchanged, similar, or sometimes reduced in comparison to those at the time of the preparation of the FEIS. As discussed above in detail, the few changes to the environmental setting since the FEIS was issued in December 2016 do not change the results of the analysis in the FEIS. As analyzed within **Section 3.0**, the conclusions and mitigation measures for the Barstow Site set forth in the FEIS remain adequate to mitigate any environmental impacts from Alternative A. The passage of time did not result in any substantial changes that are relevant to environmental concerns, and there are no significant new circumstances or information relevant to environmental concerns and bearing on Alternative A and its impacts; therefore, no additional mitigation is warranted. The FEIS is adequate to meet the BIA's NEPA compliance requirements for evaluating Alternative A, and an SEIS is unnecessary. Therefore, the FEIS remains sufficient, as described under 40 CFR § 1506.3, to serve as an adequate FEIS for Alternative A under 40 CFR Parts 1500-1508. In addition, since the actions covered by the FEIS for Alternative A and analyzed in this SIR "are substantially the same" the BIA is not required to recirculate the FEIS except as a final statement (40 CFR § 1506.3(b)).

5.0 PREPARERS

5.1 FEDERAL AGENCIES

Bureau of Indian Affairs – Pacific Regional Office

Chad Broussard, Environmental Protection Specialist

5.2 ENVIRONMENTAL CONSULTANTS

Analytical Environmental Services/Montrose Environmental

Kt Alonzo, Project Director

Kelli Raymond, Project Manager

Marcus Barrango

John Fox

Amy Gondran

Charlane Gross, RPA

Alexandra Korolkov

Margaret Shekell, AICP

Taylor Van Demarr

Ryan Munnikhuis

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ATTACHMENT A

Second Amendment to the Municipal Services Agreement

Second Amendment to the Municipal Services Agreement

This Amendment to the First Amended Municipal Services Agreement dated August 21, 2006, hereinafter the Second Amendment to the Municipal Services Agreement, is agreed upon on this **05** day of **October** 2020, by and between the City of Barstow (“City”) and the Los Coyotes Band of Cahuilla and Cupeño Indians (“Tribe”). This Second Amendment to the Municipal Services Agreement is founded upon the following Recitals:

RECITALS

WHEREAS, the City and the Tribe (jointly, the “Parties”), on August 21, 2006, entered into a First Amended Municipal Services Agreement (“First Amended MSA”) pertaining to lands in Barstow identified in Exhibit A to the First MSA, (“Trust Lands”) which are the subject of the Tribe’s fee-to-trust application pursuant to 25 U.S.C. § 5108, and request for two-part determination pursuant to 25 U.S.C. § 2701, *et seq.*, currently pending with the Department of the Interior, Bureau of Indian Affairs; and

WHEREAS, the First Amended MSA provides for the City’s support of the Tribe’s fee-to-trust application, and provides for cooperation between the Tribe and the City on matters of public services and land use on the Tribe’s Trust Lands, as well as compensation to the City for the impact on City services of the Tribe’s use of its Trust Lands; and

WHEREAS, Section 22 of the First Amended MSA provides that the agreement may be amended in writing by the Parties, prior to the Tribe’s acquisition of any land in trust within Barstow outside of the Tribe’s Trust Lands identified in Exhibit A; and

WHEREAS, the City and the Tribe agree that the First Amended MSA should be amended, and that the First Amended MSA remains in full force and effect, except to the extent that such agreement is amended as provided in the following amendments.

NOW, THEREFORE, the Parties agree as follows:

1. The fourth “whereas” clause is amended to read as follows:

The Tribe anticipates that it will enter into negotiations for a Tribal-State Compact with the Governor of California that will allow for the Tribe’s casino project on the Tribe’s Trust Lands, recognize and provide for an intergovernmental agreement between the Tribe and the City such as this Agreement, allow for a deduction in the Tribe’s required payments to the State for certain payments made by the Tribe to the City, include a comprehensive framework for reviewing and mitigating off-reservation environmental and economic impacts, and regulate public and workforce health and safety and other aspects of gaming by the Tribe.

2. Section 1. Land to be Taken into Trust., third sentence, is amended to read as follows:

The Tribe further agrees to use the Trust Lands exclusively for (a) the development and operation of a Gaming facility which will offer either Class II or Class III gaming or both, as

defined in IGRA, and other facilities (“Resort” as defined in Exhibit B), in conformity with the requirements of IGRA, with the requirements of this Agreement and with the requirements of all other applicable state and federal laws; and (b) other gaming-related uses as described in Exhibit B, so long as such related uses are intended primarily to facilitate the operation of the Resort.

3. Section 4. Police and Fire Personnel and Services., C. Fire and Police Structures., the first sentence is amended to read as follows:

If the Tribe is the first tribe to commence gaming operations on the Trust Lands or trust parcels adjacent thereto, as soon as practicable when requested by the City, which request may be made at any point after the commencement of gaming operations but before the beginning of year three of gaming operations, the Tribe shall dedicate or arrange for the dedication to the City two acres of non-federal land that is owned or under the control of the Tribe or its developer, and is near the Resort -- for fire and police station use -- on which the City will construct new fire and police stations when, and if, deemed necessary by the City in its sole discretion.

4. Section 15. Judicial Review., the listing of addresses for service of process for the Tribe is amended as follows:

Copy to:

Suzanne R. Schaeffer
1900 K Street, N.W.
Washington, D.C. 20009
Telephone: (202) 408-7097
Suzanne.Schaeffer@dentons.com

5. Section 25. General Provisions., A. Condition of Agreement., is amended to read as follows:

As a condition of this Agreement, any developer or manager of the Resort must be approved by the City, which approval shall not be unreasonably withheld.

6. Exhibit B, first paragraph, is amended to read as follows:

The provisions of this Agreement shall require the Tribe to develop a first-class high-quality destination resort including hotel(s), restaurant(s), hospitality services and a minimum 50,000 square foot casino for Class II or Class III Indian gaming, containing a number of slot machines, table games and other gaming devices or games not to exceed the maximum to be allowed under the Tribal-State Gaming Compact that will be negotiated by the Tribe and the State of California (“Resort”).


WHEREFORE, the Parties hereby execute and enter into this Second Amendment to the Municipal Service Agreement, with the intent to be bound thereby through their authorized representatives, whose signatures are affixed below.

LOS COYOTES BAND OF CAHUILLA AND CUPEÑO INDIANS

By: Ray Chapparosa
Tribal Chairman

Date: _____

CITY OF BARSTOW



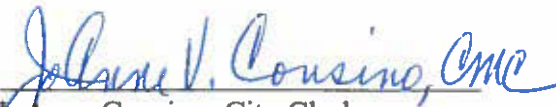
By: Julie Hackbarth-McIntire
Mayor

Date: 10/07/2020



APPROVED AS TO FORM:

By: _____
Teresa Highsmith
City Attorney

Attest: 
JoAnne Cousino, City Clerk
Secretary

LOS COYOTES BAND OF CAHUILLA AND CUPEÑO INDIANS

By: Ray Chapparosa
Tribal Chairman

Date: _____

CITY OF BARSTOW

By: Julie Hackbarth-McIntire
Mayor

Date: _____

APPROVED AS TO FORM:

By: 

Teresa Highsmith
City Attorney

Attest: _____
JoAnne Cousino, City Clerk
Secretary

LOS COYOTES BAND OF CAHUILLA AND CUPEÑO INDIANS

Ray Chapparosa

By: Ray Chapparosa
Tribal Chairman

Date: 10/11/2020

CITY OF BARSTOW

By: Julie Hackbarth-McIntire
Mayor

Date: _____

APPROVED AS TO FORM:

By: *Teresa Highsmith*
Teresa Highsmith
City Attorney

Attest: _____
JoAnne Cousino, City Clerk
Secretary

ATTACHMENT B

Cumulative Project Information 6.13.22



Engineers & Planners
Traffic
Transportation
Parking

Linscott, Law & Greenspan, Engineers
4542 Ruffner Street
Suite 100
San Diego, CA 92111
858.300.8800

www.llgengineers.com

Pasadena
Irvine
San Diego
Woodland Hills

June 13, 2022

Trenton Wilson
AES
1801 7th Street, Suite 100
Sacramento, CA 95811

LLG Reference: 3-22-3570

Subject: **Los Coyotes Casino, Transportation**

Dear Mr. Wilson:

Linscott, Law & Greenspan, Engineers (LLG) has completed a traffic comparison between the prior approved 2010 traffic study for the Los Coyotes Casino and current conditions. LLG completed a traffic study for the project dated May 19, 2010. That study analyzed 11 intersections and 4 segments in the area surrounding the proposed casino and analyzed existing conditions, near-term cumulative conditions, and horizon year long-term conditions. LLG conducted existing counts at the Lenwood Road / Mercantile Way intersection and on 3 segments along Lenwood Road in May 2022. **Tables A and B** contain a comparison between the 2010 and the 2022 existing baseline counts. The intersection count was higher in 2022 and the 3 segment counts were lower.

In terms of cumulative projects, LLG researched and discussed with City of Barstow staff and identified 3 projects in the nearby study area that were not included in the 2010 study but are likely to be built and adding traffic to the study area intersections and segments in the near-term future. These projects are described below.

1. **2796 Tanger Way (Nearing Final Inspections) | BCOM-21-0005 | Tesla Supercharger Site**
APN # 0421-321-10-0000
Zoning – General Commercial
Project Description - (20) V3 SUPERCHARGERS - LEVEL 3 + (29) WALL CONNECTORS
To note, Tesla is conducting this project in two (2) phases; phase one is nearing completion. Phase 2 will add roughly 50 additional superchargers to the site.
2. **2551 Mercantile Way (Ongoing Build) | BCOM-19-0004 | New Fairfield Inn & Marriott**
APN #0428-351-08-0000

Philip M. Linscott, PE (1924-2000)
William A. Law, PE (1921-2018)
Jack M. Greenspan, PE (Ret.)
Paul W. Wilkinson, PE (Ret.)
John P. Keating, PE (Ret.)
David S. Shender, PE
John A. Boorman, PE
Clare M. Look-Jaeger, PE (Ret.)
Richard E. Barretto, PE
Keil D. Maberry, PE
Walter B. Musial, PE
Kalyan C. Yellapu, PE
Dave Roseman, PE
An LG2WB Company Founded 1966

Zoning – General Commercial

Project Description - NEW FAIRFIELD INN HOTEL & MARRIOTT. TOTAL GROSS BUILDING AREA 100970 SF. NO. OF FLOORS 4, NO. OF ROOMS-178. CONSTRUCTION TYPE IIIA (FULLY AUTO SPRINKLER)

To note, the hotel will be built to accommodate extended stay(s) on the Fairfield Inn portion. Marriott will be a standard stay with both in the same building, on the same lot.

3. **Tortoise Rd Single-Family Homes.** (No addresses assigned to project, ongoing builds) Multiple Permits | Single Family Home(s) Housing Tract Zoning – Single Family Res.

Project Description – Single family dwellings ranging from 1600 SQ. FT. to 2000 SQ. FT. Amount of homes to be constructed is pending determination.

The 2010 traffic study included a Horizon Year analysis and a summary of those Horizon Year volumes is included in **Table C**. Also included in **Table C** are the latest Horizon Year traffic volumes from the City of Barstow SBTAM Traffic Model. As can be seen in **Table C**, current forecasted Horizon Year volumes are higher at two of the four locations as compared to those in the 2010 study.

Overall, it seems that traffic conditions have changed appreciably since the 2010 traffic study was conducted but not all volume projections are higher.

Please call us at 858.300.8800 if you have any questions.

Sincerely,

Linscott, Law & Greenspan, Engineers



John Boarman, PE
Principal
California Registration: C 50033

TABLE A
EXISTING INTERSECTION COMPARISON SUMMARY

Roadway Segment	Weekday ^a	
	Year 2022 PM Peak Hour ^b	PM Peak Hour (2010 LLG Report) ^c
	Entering Volume ^b	
1. Lenwood Rd / Mercantile Wy	213	189

Footnotes:

- a. Entering volumes.
- b. Counts were conducted May 4, 2022.
- c. Counts were conducted February 10, 2009.

TABLE B
EXISTING ROADWAY SEGMENT COMPARISON

Roadway Segment	Weekday	
	Existing 2022 ^a	Existing (2010 LLG Report) ^b
	ADT	
Lenwood Road		
I-15 NB Ramps to Mercantile Way	5,670	10,560
Mercantile Way to Project Access	1,960	2,220
Project Access to Outlet Center Drive	1,220	1,270

Footnotes:

- a. Counts were conducted May 4, 2022.
- b. Counts were conducted February 10, 2009. ADTs were extrapolated from PM peak hour volumes.



TABLE C
HORIZON YEAR ROADWAY SEGMENT OPERATIONS

Roadway Segment	Horizon Year 2040 SBTAM Model ^a	Horizon Year 2035 (2010 LLG Report)
	ADT	
Lenwood Road		
I-15 NB Ramps to Mercantile Way	11,663	17,880
Mercantile Way to Project Access	7,250	5,730
Project Access to Outlet Center Drive	3,325	3,500
Outlet Center Drive		
Lenwood Road to I-15 NB Ramps	3,325	2,870

Footnotes:

- a. Traffic Volumes obtained from Year 2022 City of Barstow SBTAM Model.

ATTACHMENT C

Transportation Analysis 6.29.22



Engineers & Planners
Traffic
Transportation
Parking

Linscott, Law & Greenspan, Engineers

4542 Ruffner Street
Suite 100
San Diego, CA 92111
858.300.8800

www.llgengineers.com

Pasadena
Irvine
San Diego
Woodland Hills

June 29, 2022

Trenton Wilson
AES
1801 7th Street, Suite 100
Sacramento, CA 95811

LLG Reference: 3-22-3570

Subject: **Los Coyotes Casino, Transportation Analysis**

Dear Mr. Wilson:

Linscott, Law & Greenspan, Engineers (LLG) completed a traffic study for the subject project dated May 19th, 2010. That study analyzed 11 intersections and 4 segments in the area surrounding the proposed casino and analyzed existing conditions, near-term cumulative conditions, and horizon year long-term conditions. LLG conducted existing counts at the Lenwood Road / Mercantile Way intersection and on 3 segments along Lenwood Road in May 2022. **Tables A** and **B** contain a comparison between the 2010 and the 2022 existing baseline counts.

These tables show that current traffic volumes are similar and, in some cases, less than those counted in 2010. In addition, traffic on I-15 at Lenwood Road was 55,000 ADT in 2010 and was 54,000 ADT in 2020, very similar (see *Appendix A*). Based on this evidence, it is concluded that traffic conditions are generally unchanged between when the original traffic study was completed in 2010 and today's conditions. Therefore, the conclusions of the 2010 traffic study are still valid.

Please call us at 858.300.8800 if you have any questions.

Sincerely,

Linscott, Law & Greenspan, Engineers

John Boorman, PE
Principal
California Registration: C 50033

Philip M. Linscott, PE (1924-2000)
William A. Law, PE (1921-2018)
Jack M. Greenspan, PE (Ret.)
Paul W. Wilkinson, PE (Ret.)
John P. Keating, PE (Ret.)
David S. Shender, PE
John A. Boorman, PE
Clare M. Look-Jaeger, PE (Ret.)
Richard E. Barretto, PE
Keil D. Maberry, PE
Walter B. Musial, PE
Kalyan C. Yellapu, PE
Dave Roseman, PE
An LGZWB Company Founded 1966

TABLE A
EXISTING INTERSECTION COMPARISON SUMMARY

Roadway Segment	Weekday ^a	
	Year 2022 PM Peak Hour ^b	PM Peak Hour (2010 LLG Report) ^c
	Entering Volume ^b	
1. Lenwood Rd / Mercantile Wy	213	189

Footnotes:

- a. Entering volumes.
- b. Counts were conducted May 4, 2022.
- c. Counts were conducted February 10, 2009.

TABLE B
EXISTING ROADWAY SEGMENT COMPARISON

Roadway Segment	Weekday	
	Existing 2022 ^a	Existing (2010 LLG Report) ^b
	ADT	
Lenwood Road		
I-15 NB Ramps to Mercantile Way	5,670	10,560
Mercantile Way to Project Access	1,960	2,220
Project Access to Outlet Center Drive	1,220	1,270

Footnotes:

- a. Counts were conducted May 4, 2022.
- b. Counts were conducted February 10, 2009. ADTs were extrapolated from PM peak hour volumes.

APPENDIX A

CALTRANS HIGHWAY TRAFFIC VOLUMES – YEAR 2020

2010 Traffic Volumes Book

Dist	Route	CO	Postmile	Description	Back Peak Hour	Back Peak Month	Back AADT	Ahead Peak Hour	Ahead Peak Month	Ahead AADT
8	15	SBD	44.402	STODDARD WELLS RD	5,600	66,000	60,000	6,000	65,000	56,000
8	15	SBD	47.39	N JUNCTION STODDARD WELL	6,000	65,000	56,000	5,900	64,000	55,000
8	15	SBD	51.831	BOULDER RD	5,900	64,000	55,000	5,900	64,000	55,000
8	15	SBD	55.693	WILD WASH BRIDGE	5,900	64,000	55,000	5,900	64,000	55,000
8	15	SBD	60.159	HODGE RD	5,900	64,000	55,000	5,900	64,000	55,000
8	15	SBD	65.84	SIDEWINDER RD	5,900	64,000	55,000	5,900	64,000	55,000
8	15	SBD	68.77	BARSTOW, LENWOOD RD	5,900	64,000	55,000	5,900	64,000	55,000
8	15	SBD	70.104	BARSTOW, JCT RTE 58 EAST	6,300	67,000	58,000	7,700	83,000	71,000
8	15	SBD	71.618	BARSTOW, L ST	7,700	83,000	71,000	7,600	81,000	70,000
8	15	SBD	73.543	JCT. RTE. 247 SOUTH, BARSTOW	7,600	81,000	70,000	7,000	76,000	65,000
8	15	SBD	74.418	BARSTOW, JCT. RTE. 40 EAST	7,000	76,000	65,000	6,200	56,000	46,000
8	15	SBD	74.949	BARSTOW, EAST MAIN ST	6,200	56,000	46,000	6,200	56,000	46,000
8	15	SBD	76.883	JCT. RTE. 58 WEST	6,200	56,000	46,000	6,200	56,000	46,000
8	15	SBD	79.593	FORT IRWIN/MERIDIAN RD	6,200	56,000	46,000	5,800	52,000	43,000
8	15	SBD	81.84	GHOST TOWN RD	5,800	52,000	43,000	5,600	51,000	42,000
8	15	SBD	84.641	YERMO/CALICO RD	5,600	51,000	42,000	5,400	48,500	40,000
8	15	SBD	86.38	EAST YERMO	5,400	48,500	40,000	5,400	48,500	40,000
8	15	SBD	88.489	MINNEOLA RD	5,400	48,500	40,000	5,400	48,500	40,000
8	15	SBD	96.41	HARVARD RD	5,400	48,500	40,000	5,300	48,000	39,500
8	15	SBD	103.63	FIELD RD	5,300	48,000	39,500	5,400	48,500	40,000
8	15	SBD	111.59	AFTON RD	5,400	48,500	40,000	5,400	48,500	40,000
8	15	SBD	120.43	BASIN RD	5,400	48,500	40,000	5,300	48,000	39,500
8	15	SBD	124.24	RASOR RD	5,300	48,000	39,500	5,300	48,000	39,500
8	15	SBD	130.18	ZZYXZ RD	5,300	48,000	39,500	5,300	48,000	39,500
8	15	SBD	135.81	WEST BAKER	5,300	48,000	39,500	4,400	40,000	33,000
8	15	SBD	136.57	BAKER, JCT. RTE. 127	4,400	40,000	33,000	4,300	38,500	32,000
8	15	SBD	138.46	EAST BAKER	4,300	38,500	32,000	5,200	46,500	38,500
8	15	SBD	149.61	HALLORAN SPRINGS	5,200	46,500	38,500	5,200	46,500	38,500
8	15	SBD	155.57	HALLORAN SUMMIT	5,200	46,500	38,500	5,200	46,500	38,500
8	15	SBD	162.73	CIMA RD	5,200	46,500	38,500	5,200	46,500	38,500
8	15	SBD	171.47	BAILEY RD	5,200	46,500	38,500	5,200	46,500	38,500
8	15	SBD	176.46	NIPTON RD	5,200	46,500	38,500	5,300	48,000	39,500
8	15	SBD	181.4	YATES WELL RD	5,300	48,000	39,500	5,300	48,000	39,500
8	15	SBD	186.24	NEVADA STATE LINE	5,300	48,000	39,500			
3	16	COL	0	JCT. RTE. 20				100	750	590
3	16	COL	7.256	COLUSAYOLO CO LINE	100	750	590			
3	16	YOL	0	COLUSAYOLO CO LINE				120	810	700
3	16	YOL	7.146	RUMSEY, MANZANITA AVE	120	810	700	180	1,300	1,100

PREFACE

Traffic Profile

This lists the 2020 traffic volumes for counts locations on the California state highway. Peak hours, peak month ADTs and annual ADTs are shown at count locations.

Significant volume changes (breakpoints) in the traffic profile along each route are identified by name and post mile value. In addition to the profile breakpoints, there are county lines and landmarks to aid in orientation. The numbers shown apply to the highway in both directions, back and ahead of the locations. Therefore, between any two successive breakpoints on a route it may be assumed that traffic volumes will vary from one breakpoint to the next at a reasonably uniform rate of increase or decrease. Where only a single set of figures appears between two breakpoints, a constant volume of traffic may be assumed for the intervening section of highway.

All traffic volume figures listed include traffic in both directions unless otherwise indicated.

Route Number

All California State highways are listed in order of Legislative Route Number.

Post Mile

Each profile breakpoint is identified by the postmile value corresponding to that point on the highway. The post mile value increases from the beginning of a route within a county to the county line. The post mile values start over again at each county line. Post mile values increase from South to North or West to East depending upon the general direction that the route follows within the state. The post mile at a given location will remain the same year after year. When a section of road is relocated, new post miles (usually noted by an alphabetical letter such as "R" or "M") are established for it.

Annual Average Daily Traffic (Annual ADT)

Annual average daily traffic is the total traffic volumes for the year divided by 365 days. The traffic count year is from October 1st through September 30th. Few locations in California are counted continuously. Traffic counting is generally performed by electronic counting and is moved from location to location throughout the State in a program of continuous traffic sampling. The resulting counts are adjusted to an estimate of annual average daily traffic, compensating for seasonal influence, weekly variation and other variables which may be present. Annual ADT is necessary for presenting a statewide picture of traffic flow, evaluating traffic trends, computing collision rates, planning and designing highway and other public facilities.

Peak Month ADT

The peak month ADT is average daily traffic for the month of heaviest traffic flow. This is obtained because on many routes, high traffic volumes which occur during a certain season of the year are more representative of traffic conditions than the annual ADT.

DISTRICT	ROUTE	RTE_SFX	COUNTY	PM_PFX	PM	PM_SFX	DESCRIPTION	BACK_PEAK_HOUR	BACK_PEAK_MADT	BACK_AADT	AHEAD_PEAK_HOUR	AHEAD_PEAK_MADT	AHEAD_AADT
08	015	SBD			44.402		STODDARD WELLS ROAD	6100	71000	59000	5700	66000	55000
08	015	SBD			47.390		NORTH JUNCTION STODDARD WELLS ROAD (BELL MOUNTAIN)	5700	66000	55000	5600	65000	54000
08	015	SBD			51.831		BOULDER ROAD	5600	65000	54000	5600	65000	54000
08	015	SBD			55.693		WILD WASH BRIDGE	5600	65000	54000	5600	65000	54000
08	015	SBD			60.159		HODGE ROAD	5600	65000	54000	5600	65000	54000
08	015	SBD			65.840		SIDEWINDER ROAD	5600	65000	54000	5600	65000	54000
08	015	SBD			68.770		BARSTOW, LENWOOD ROAD	5600	65000	54000	6200	72000	60000
08	015	SBD			70.104		BARSTOW, JCT RTE 58 EAST	6200	72000	60000	7500	88000	73000
08	015	SBD			71.618		BARSTOW, L ST	7500	88000	73000	7400	87000	72000
08	015	SBD			73.543		JCT. RTE. 247 SOUTH	7400	87000	72000	7000	82000	68000
08	015	SBD			74.418		BARSTOW, JCT. RTE. 40 EAST	7000	82000	68000	5600	54000	43000
08	015	SBD			74.949		BARSTOW, EAST MAIN ST	5600	54000	43000	5600	54000	43000
08	015	SBD			76.883		JCT. RTE. 58 W	5600	54000	43000	5600	54000	43000
08	015	SBD			79.593		FORT IRWIN/MERIDIAN ROADS	5600	54000	43000	5500	53000	42000
08	015	SBD	R		103.633		FIELD ROAD	4900	47000	37500	4900	47000	37500
08	015	SBD	R		81.840		GHOST TOWN ROAD	5500	53000	42000	5100	49000	39000
08	015	SBD	R		84.641		YERMO/CALICO ROAD	5100	49000	39000	5000	47500	38000
08	015	SBD	R		86.380		EAST YERMO	5000	47500	38000	5000	47500	38000
08	015	SBD	R		88.489		MINNEOLA ROAD	5000	47500	38000	5000	47500	38000
08	015	SBD	R		96.410		HARVARD ROAD	5000	47500	38000	4900	47000	37500
08	015	SBD	R		111.592		AFTON ROAD	4900	47000	37500	4900	47000	37500
08	015	SBD	R		120.425		BASIN ROAD	4900	47000	37500	4900	47000	37500
08	015	SBD	R		124.237		RASOR ROAD	4900	47000	37500	4900	47000	37500
08	015	SBD	R		130.181		ZZYZX ROAD	4900	47000	37500	4900	47000	37500
08	015	SBD	R		135.806		W BAKER	4900	47000	37500	4300	41500	33000
08	015	SBD	R		136.574		BAKER, JCT. RTE. 127	4300	41500	33000	4200	40000	32000
08	015	SBD	R		138.456		EAST BAKER	4200	40000	32000	4900	47000	37000
08	015	SBD			149.605		HALLORAN SPRINGS	4900	47000	37000	4900	47000	37000
08	015	SBD			155.571		HALLORAN SUMMIT	4900	47000	37000	4900	47000	37000
08	015	SBD			162.733		CIMA ROAD	4900	47000	37000	4900	47000	37000
08	015	SBD			171.471		BAILEY ROAD	4900	47000	37000	4900	47000	37000
08	015	SBD			176.459		NIPTON ROAD	4900	47000	37000	5000	48500	38000
08	015	SBD			181.396		YATES WELL ROAD	5000	48500	38000	5000	48500	38000
08	015	SBD			186.238		NEVADA STATE LINE	5000	48500	38000			