



FINAL ENVIRONMENTAL EVALUATION

SAN PASQUAL BAND OF MISSION INDIANS VALLEY VIEW CASINO EXPANSION

FEBRUARY 2018

LEAD AGENCY:

San Pasqual Band of Mission Indians
16300 Nyemii Pass Road
Valley Center, CA 92082



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16300 Nyemii Pass Road
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PREPARED BY:

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SECTION 1.0

INTRODUCTION AND SUMMARY OF PROJECT

SECTION 1.0

INTRODUCTION AND SUMMARY OF PROJECT

This is the Final Environmental Evaluation (EE) for the San Pasqual Band of Mission Indian's (Tribe's) Valley View Casino Expansion Project. This Final EE has been prepared after consideration of all comments received from the public, local governments, and regulatory agencies on the January 2018 EE.

As described in the January 2018 EE, the Tribe proposes to expand the Valley View Casino by adding approximately 40,000 square feet of additional building space. This area would include an expanded gaming area, restaurant and kitchen, promotions area, offices, and new restrooms. The proposed project would also involve the renovation of the existing Casino to accommodate a 2,550-square foot buffet expansion and a 1,130-square foot players club. The proposed project does not involve a net increase in the number of gaming devices in the short term, though it would provide space for additional gaming devices in the future if the Tribe's compact allows. Additionally, the proposed project includes the construction of a new welcome sign on land owned by the Tribe near the intersection of Valley Center Road and N. Lake Wohlford Road. Prior to the expansion project, the Tribe is completing an EE process consistent with the Tribal State Gaming Compact, Section 10.8, and the Tribe's Environmental Ordinance (Ordinance No. 062000-1). A summary of the proposed mitigation measures from the January 2018 EE is presented in **Table 1-1**.

As part of the Tribe's environmental review process, the EE was circulated for a 30-day comment period from January 8 to February 7, 2018. Copies of the EE were made available to local government and regulatory agencies, members of the public, and other interested parties. Copies of all written comments received are provided in **Section 2.0**.

The Tribe held a public meeting to receive additional comments regarding the project on February 8, 2018, at 5:00 p.m. in the Valley View Casino Events Center, 16300 Nyemii Pass Road, Valley Center, California. The minutes from the public comment portion of the meeting are provided in **Section 2.0** of this document. The newspaper notice announcing the public meeting is included in **Appendix A**.

The Tribe, in determining how to proceed with the proposed project, considered all comments made during the public review period. Based on the comments received, the Tribe has added the mitigation measures described in **Table 1-2** and has revised the proposed project as described in **Section 3.0**. Most importantly, the Tribe has decided not to proceed with the construction of the 58-foot welcome sign described in the EE, and instead is beginning a new design process for a smaller welcome sign.

TABLE 1-1
SUMMARY OF MITIGATION MEASURES FROM JANUARY 2018 EE

Category	Mitigation Measures
Aesthetics	
<i>Light and Glare</i>	Any exterior walkway, security, or decorative lighting associated with the proposed expansion may consist of downcast, fully cut-off shielded low-pressure sodium lighting as per Section 59.105 of the San Diego County Light Pollution Code.
	Neon and flashing lights may not be included on the exterior of the proposed expansion.
	All lighting associated with the proposed welcome sign may be low-pressure sodium or light-emitting diode (LED) with cut-off lenses and downcast illumination.
	Any construction lighting used may be downcast and shielded to the maximum extent feasible.
Air Quality	
<i>Construction</i>	Use Tier 3 construction equipment, to the extent feasible, at a maximum of 90 percent of the equipment's total horsepower.
	Apply water to exposed construction areas twice a day—or as needed.
	Restrict construction vehicle idling to five minutes.
<i>Operation</i>	Comply with Title 24 energy-conservation standards.
	Install low flow faucets and toilets.
	Use low VOC architectural coatings.
	Use recycled water for outdoor water use.
	Use energy efficient lighting.
Water Resources	
<i>Surface Water Quality</i>	Continue to implement source control BMPs as part of the existing site maintenance program to reduce potential pollutant discharge. The Casino expansion may be incorporated into these ongoing programs. These include: • Regular inspection of rooftop drainage conveyances (downspouts and piping) as well as the detention basin and landscaped areas, particularly after a rain event; • Regular maintenance of landscaped areas, including a) stabilization of eroded slopes, b) landscape repair, and c) sediment removal; and • Regular inspection of trash enclosures and outdoor material storage areas.
	Vegetated swales may continue to be utilized to decrease runoff velocity and trap pollutants.
	Drop inlets may be installed at key locations to channel stormwater to sedimentation traps or detention basins.

	Detention basins may provide desiltation and filtering of first flush contaminants for runoff from large and small storm events.
Public Services	
<i>Demolition / Construction Solid Waste</i>	During the demolition phase, contractors may remove reusable/recyclable materials (concrete, asphalt, and steel) from the site to local recycling centers. All other materials may be disposed of in common debris bins for transport to local waste handling facilities for sorting and removal of all reusable/recyclable materials, prior to the remaining waste being transported to local landfills for disposal. The contractors may be required to report quantities, by weight, of each type of recyclable material recovered from the site and the amount of materials reused/recycled as a percentage of all materials removed from the site. Any trade utilizing any hazardous materials in the performance of their work may utilize the appropriate reclaiming and/or disposal procedures for those products. They may comply with all applicable federal, state and county regulations regarding the reclamation and/or disposal of such hazardous materials separate from all other construction-generated waste.
<i>Water Supply</i>	Continue to use tertiary treated reclaimed water for on-site landscape irrigation and for the irrigation of properties elsewhere on the Reservation. Low-flow plumbing fixtures and waterless urinals may be installed in restrooms in the expanded portion of the Casino to the extent feasible.
Transportation / Traffic	
<i>Traffic</i>	If not already completed prior to the beginning of construction of the Casino expansion, the Tribe may fund the construction of a westbound right-turn lane at the intersection of Valley Center Road and Cole Grade Road. If other regional development projects are also conditioned to provide the improvement, the Tribe may make a pro-rate contribution to the construction of this right-turn lane. As an alternative to the previous mitigation measure, the Tribe may also either pay a Traffic Impact Fee (TIF) to the County of San Diego (as described in additional detail below), <i>or</i> may make a combination of partial payments to the TIF and to the funding of the right-turn lane.
Cumulative	
<i>Transportation / Traffic</i>	The Tribe may pay a Traffic impact Fee (TIF) to the County of San Diego that is proportional to the contribution of proposed project traffic to the segment's [Valley Center Road east of N. Lake Wohlford Road] exceedance of County LOS standards. As an alternative to the previous mitigation measure, the Tribe may also contribute to the funding of a right-turn lane at the intersection of Valley Center Road and Cole Grade Road (as described above), <i>or</i> may make a combination of partial payments to the TIF and the construction of the right-turn lane.

TABLE 1-2
MITIGATION MEASURES ADDED TO THE FINAL EE

Aesthetics	
<i>Light and Glare</i>	The proposed 58-foot welcome sign described in the EE will not be built. Instead, the Tribe will redesign and construct a smaller welcome sign that will comply with the County of San Diego's (County's) dark sky ordinance. The Tribe will consult with representatives from the Palomar Observatory during the design process to ensure that the welcome sign's impacts on the operations of the Observatory are minimized.
Transportation / Traffic	
<i>Traffic</i>	The Tribe will consult with the County regarding possible alternative traffic mitigation measures.

SECTION 2.0

COMMENTS RECEIVED

SECTION 2.0

COMMENTS RECEIVED

Comment letters received during the public comment period for the EE are listed in **Table 2-1**, and are provided in their entirety on the following pages. Minutes from the public comment portion of the public meeting held on February 8, 2018 are included after the comment letters. Issues are individually bracketed and numbered in the margins of the comment letters. Responses to the numbered comments are provided in **Section 3.0**.

TABLE 2-1
LIST OF COMMENTERS

Letter	Individual or Signatory	Affiliation	Date
1	Eric Lardy	County of San Diego	February 13, 2018
2	Oliver Smith	Valley Center Community Planning Group	February 7, 2018
3	Ivy Osornio	Department of Toxic Substances Control	January 31, 2018
4	Scott Morgan	State Clearinghouse	February 6, 2018
5	Minutes from public meeting		February 8, 2018



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

February 13, 2018

Carly Lucero
San Pasqual Casino Development Group Inc.
16300 Nyemii Pass Road
Valley Center, CA 92082

Via e-mail to: clucero@valleyviewcasino.com

REQUEST FOR COMMENTS ON THE NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL ASSESSMENT FOR THE VALLEY VIEW CASINO EXPANSION PROJECT

The County of San Diego (County) reviewed the San Pasqual Band of Mission Indians (Tribe) Request for Comments on the Notice of Availability of an Environmental Assessment for the Valley View Casino Expansion Project dated January 8, 2018 (Project).

The County appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

TRIBAL COMPACT

1. In accordance with Section 10.8.1 of the Gaming Compact (Compact) between the San Pasqual Band of Mission Indians (Tribe) and the State of California, dated September 10, 1999, the TEIR must analyze the potentially significant off-reservation environmental impacts from the Valley View Casino Expansion Project.

GENERAL

2. The County's Land Use and Environment Group has developed guidelines for determining significance that are used to evaluate the impacts of environmental consequences in the unincorporated portions of the County. The guidelines also provide mitigation options for addressing significant impacts. To assure that all impacts from the project are adequately analyzed, the County urges the use of these guidelines in preparation of all environmental sections of a TEIR. The guidelines are available on the Planning & Development Services (PDS) website (<http://www.sdcountry.ca.gov/pds/procguid.html>). In addition, the County encourages the Tribe to hire consultants from the County-approved list for all environmental subject areas.

Mr. Lucero
February 13, 2018
Page 2

AESTHETICS

1. Section 2.2.3 of the Environmental Evaluation identifies that a new 58 foot tall illuminated welcome sign with two illuminated video displays is being proposed along Valley Center Road.
- a. The County respectfully requests that the TEIR address how the proposed signage meets the Intergovernmental between the Tribe and the County, specifically, Section A.1.b. – Permanent Exterior Lighting.

1-2

TRANSPORTATION/TRAFFIC

1. A Direct Impact is identified on Valley Center Road between Cole Grade Road and N. Lake Wohlford Road. The Traffic Impact Analysis (TIA) provides only one proposed mitigation at one intersection for this Direct Impact to a 2.9 mile segment of Valley Center Road. It is requested that the TIA demonstrate how the proposed road improvement would fully mitigate the project's direct impact.
2. The TIA should consider other potential projects to mitigate this Direct Impact. Other potential improvement projects that would mitigate the Direct Impact to Valley Center Road include:
 - a. Fair-share contribution to widening and realignment of Valley Center Road between Cole Grade Road and "New Roads 14/15". This segment of Valley Center Road is classified as a 4.2A Boulevard with Bike Lanes on the County's General Plan Mobility Element.
 - b. The widening and/or restriping of Valley Center Road between "New Roads 14/15" and N. Lake Wohlford Road for Buffered Bike Lanes.
3. It is requested that the TIA address and mitigate any cumulative and direct off-reservation traffic impacts to County-maintained roads.

1-3

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,



Eric Lardy, AICP
Group Program Manager, Advance Planning Division
Planning & Development Services

E-mail cc: Darren Gretler, Chief of Staff, Board of Supervisors, District 5
Vincent Kattoula, CAO Staff Officer, LUEG
Nick Ortiz, Project Manager, PDS
Richard Chin, Associate Transportation Specialist, DPW
Jeff Kashak, Land Use / Environmental Planner, DPW

Valley Center Community Planning Group

PO Box 127 Valley Center CA 92082

February 7, 2018



Oliver Smith
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1 vacancy

Eric Lardy
Group Program Manager, Advance Planning
Planning & Development Services
5510 Overland Avenue, Suite 102
San Diego, CA 92123

Subject: **VCCPG Comments On Valley View Casino January 2018 Expansion Project Environmental Evaluation**

Eric,

The Valley Center Community Planning Group has reviewed the provided documentation for the Valley View Casino January 2018 Expansion Project Environmental Evaluation. In general, we are supportive of a major business in Valley Center that wishes to expand and agree that the casino expansion itself will be a positive impact on Valley Center.

However, we have the following comments and concerns with the project as presented.

- 1) The proposed 58 foot tall dual display digital billboard located at the southeast corner of Valley Center Rd. and North Lake Wohlford Rd is seen as a significant light source for residents of Valley Center within a half a mile radius of its location. This light source, as proposed, will result in a significant, deleterious effect on the dark evening and night skies that are a hallmark reason why many Valley Center residents moved to our fine community. A key element to the Conservation and Open Space Element of the San Diego County General Plan updated in 2011 is:

"Visual Resources—Protect scenic corridors, geographically extensive scenic viewsheds, and dark skies within the natural environment. Goals and policies in this section emphasize the protection of scenic corridors and dark skies within the natural environment and the recognition and enhancement of community character within the built environment.

GOAL COS-13

Dark Skies. Preserved dark skies that contribute to rural character and are necessary for the local observatories."

Policies

COS-13.1 Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.

COS-13.3 Collaboration to Retain Night Skies. Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to retain the quality of night skies by minimizing light pollution.

We recommend the signage comply with the County's Dark Skies and Light Pollution Codes. The following are suggested requirements for the digital billboard signage:

- a) Emitted light from the light-emitting diode (LED) display shall be self-dimming (day and night) and limited to 0.3 foot-candles over ambient light (day and night) measured at 5' high and 250' away in maximum white contrast.
- b) The LED emitted light from the display should be directional, shielded from above, and with less light overspill than current backlighting.

2-1

2) The implementation of the messaging on the proposed 58 foot tall dual display digital billboard is seen as a potential major source of driver distraction on the projects adjacent nexus roads. To preclude the creation of any traffic hazards, the following are suggested requirements for the digital billboard messaging content:

- a) Message/image duration should be at least six seconds with instant transition to subsequent messages Message/Image shall contain no special effects. video. flashing, intermittent. moving lights. motion. or changes in intensity (driver distraction reduction).
- b) Message/image duration should be at least six seconds with instant transition to subsequent messages Message/Image shall contain no special effects. video. flashing, intermittent. moving lights. motion. or changes in intensity (driver distraction reduction).
- c) The sign should only advertise events occurring on Tribal property.

3) We do not know if technical representatives from the Palomar Observatory are aware of, and have analyzed the proposed 58 foot tall dual display digital billboard and the significant of the light output from the displays. If so, we would like to get a copy of their response. From the Conservation and Open Space Element of the San Diego County General Plan updated in 2011 is:

"The maintenance of dark skies in San Diego County is vital to the two world-class observatories (Palomar and Mount Laguna Observatories) that depend on them for astronomical research. The criteria for high-quality sites includes freedom from nearby sources of light, dust, and smoke."

4) We question why the proposed digital billboard is separate from the casino. Other local casinos have their digital billboard signage on the casino property itself rather than separate or significantly remote from the casino property. A concern raised was the possible impact of vandalism on what appears to be very costly signage due to its remote location that is potentially not as well monitored as signage on the casino property itself. This should be a question asked not only of the Tribe, but also the San Diego Sheriff's Department and California Highway Patrol that are responsible for public safety in this area.

5) Valley Center Rd and North Lake Wohlford Rd are key thoroughfares for traffic in Valley Center, whether it be for local residents or for traffic only transiting through Valley Center to other destinations. A key concern raised is concern over safety of the community by the increase of public traveling to and from the casino.

It was noted that the project takes full advantage of the road expansion on Valley Center Rd at the bottom of the hill in Escondido. However, the evaluation indicates road traffic in places such as Cole Grade Road to N. Lake Wohlford Road will change from LOS E to LOS F. Yet the evaluation of different factors relating to this project have come up as "less than significant". We would like clarification on the several conclusions by the evaluation that designate any impacts relating to the expansion as "less than significant".

The following are specific suggested changes to the project nexus roads:

- a) Any nexus road Traffic Impact Fees collected by the county be used to specifically improve the nexus roads around the casino.
- b) Improve the Westbound right turn lane on Cole Grade and Valley Center Rd.
- c) Improve N Lake Wohlford road south from Valley Center Rd towards the casino and up to casino entrance into a four lane road. This is so that, from a safety perspective, ingress and egress from the Middle School, Fire Department Station, and Sheriff Station are still easily accessed and responders to and from these locations can leave and arrive more quickly.

5) Other concerns raised with the evaluation include:

- a) Are the additional 5 security personnel being added to the casino for the expansion enough? Casinos can be a general natural attraction for theft/crime in the area.

2-1
(Cont.)

2-2

2-3

Comment Letter 2

- b) Does the County of San Diego have any additional information on the project not currently supplied by representatives of the project.
- c) It is very unfortunate that the Valley Center Design Review Board has not formally reviewed the project and provided comments and recommendations of their own. We appreciate their varying and well thought out viewpoints on projects such as this.

The Valley Center Community Planning Group would like to thank you for your consideration of these issues seen with the Valley View Casino January 2018 Expansion Project Environmental Evaluation.

If there are questions or concerns, please let me know.

Respectfully,



Oliver Smith, Chair
Valley Center Community Planning Group

cc: San Pasqual Casino Development Group, Inc.

VCDRB Chair Keith Robertson

VCCPG Members



Matthew Rodriguez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

January 31, 2018

San Pasqual Casino Development Group, Inc.
c/o Carly Lucero
16300 Nyemii Pass Road
Valley Center, California 92082
clucero@valleyviewcasino.com

ENVIRONMENTAL EVALUATION FOR VALLEY VIEW CASINO EXPANSION PROJECT (SCH# 2018011006)

Dear Ms. Lucero:

The Department of Toxic Substances Control (DTSC) has reviewed the subject Environmental Evaluation (EE). The proposed project evaluated in this EE consists of: expanding the existing Valley View Casino (Casino) by approximately 40,000 square feet (sf), including the addition of 22,545 feet of gaming floor; a 2,550-sf buffet expansion; the replacement of the existing players club with a 1,130-sf main players club; and construction of a new welcome sign by the San Pasqual Casino Development Group (project proponent). The approximately 116,700-sf Casino is located on the San Pasqual Reservation in San Diego County.

Based on the review of the submitted document, DTSC has the following comments:

1. The EE should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.
2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
3. If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials should be investigated and mitigated/disposed of in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls containing

Ms. Carly Lucero
January 31, 2018
Page 2

materials is present in onsite buildings and address as necessary to protect human health and the environment.

4. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5324 or by email at Ivy.Osornio@dtsc.ca.gov.

Sincerely,



Ivy Osornio
Project Manager
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program

kl/io

cc: (via e-mail)

Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis
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Dave.Kereazis@dtsc.ca.gov

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Shahir.Haddad@dtsc.ca.gov

CEQA# 2018011006



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

February 6, 2018

Joe Navarro
San Pasqual Band of Mission Indians
16300 Nyemii Pass Road
Valley Center, CA 92082

Subject: Valley View Casino Expansion Project
SCH#: 2018011006

Dear Joe Navarro:

The State Clearinghouse submitted the above named Other Document to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 5, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Morgan".

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2018011006
Project Title Valley View Casino Expansion Project
Lead Agency San Pasqual Band of Mission Indians

Type Oth Other Document
Description Note: Environmental Evaluation (EE)

The Tribe proposes to expand its existing Casino by approx 40,000 sf, thereby providing additional space for a restaurant, offices, an expanded gaming floor area, and other facilities. The expansion would occur in a graded and paved area immediately south of the Casino's existing entrance.

Lead Agency Contact

Name Joe Navarro
Agency San Pasqual Band of Mission Indians
Phone (760) 291-5577
email
Address 16300 Nyemil Pass Road
City Valley Center
Fax
State CA **Zip** 92082

Project Location

County San Diego
City
Region
Lat / Long 33° 13' 10.5" N / 116° 58' 22.8" W
Cross Streets North Lake Wohlford Rd/Nyemil Pass Rd
Parcel No. tribal trust land
Township 11S **Range** 1W **Section** 15 **Base** SBBM

Proximity to:

Highways
Airports
Railways
Waterways Paradise Creek, Escondido Crk
Schools Valley Center MS
Land Use Tribal trust land - commercial

Project Issues Aesthetic/Visual; Air Quality; Public Services; Traffic/Circulation; Water Quality; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 11; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; California Department of Justice, Attorney General's Office; Department of General Services

Date Received 01/05/2018 **Start of Review** 01/05/2018 **End of Review** 02/05/2018

Valley View Casino & Hotel Expansion Project Public Hearing *February 5, 2018*

Attendees:

San Pasqual Casino Development Group:

Joe Navarro
Al Cope
Bruce Howard
Judy Wright
Jim Kesaris

AES:

David Zweig

Business Committee:

Dave Toler
Tilda Green

Glenn Feldman

Gaming Commission:

Justin Quisquis
Pat Ockert

Fifteen Members of the Community

Joe opened the meeting with an introduction and explanation of the Environmental Evaluation and the public hearing process. Dave Zweig introduced himself and opened the floor for comments from the members of the community in attendance.

Daria Gardner, Cuca Ranch Community in Pauma Valley

Concerned with the billboard sign in the plan, very big with a lot of light. Concerned of the effect on our community and the observatory.

Oliver Smith, Chair of Valley Center Planning Group

The Planning Group attempted to email a formal letter last night but indicated the attempt was unsuccessful so a hard copy was presented at the meeting. The planning group generally does not disagree with the overall plan. The Planning Group does however have a couple concerns with implementation of off-reservation impacts of the project. The first being the proposed billboard, concerns regarding the safety of traffic with regards to messages and cited national standards for driver distraction. Also the amount of light and its effect on the San Diego Science Center on Palomar Mountain. Asked if the tech people from the observatory have reviewed and approved the proposal. Do not understand the necessity for the sign considering it is in remote location from facility, not on casino property. Concern for vandalism and have you asked what the Sheriff thinks of the sign. Also concern for the impact of the expansion on the community's roads, as they all need improvement. Although the construction at the bottom of the grade is being taken advantage, analysis shows that the roads are less than enough and the impact could be significant. Believes it will take Valley Center Road from an E to and F level of service. Valley Center Road is critical to residents and transient traffic and needs to be handled properly.

Sue Janis, Valley Center Planning Group

The sign is very big, very concerned for light affecting the Palomar Observatory. Valley Center is already as a community taking action to cut down on the lighting around the community to help the dark night skies.

Claire Collins, Valley Center Resident

Concerned for the children, worried the sign will create a rift amongst the children, a distraction, create and undercurrent of animosity based on parents' beliefs regarding the sign.

Steve Flanders, Outreach Program at Palomar Observatory, Representing Cal Tech

The observatory wants to be supportive in the development plan. Concerned about the sign containing 4 LCD displays, unlike Harrah's, this location is elevated and impacts the observatory with improper light consideration as it is just below the horizon for the telescope. They believe it will likely significantly threaten the performance of the observatory. The observatory is doing wonderful science and research, helping in research in the evolution of the universe. They would like to point out section 3.2.1 of the proposal, in that section it is stated that this facility's lighting plans were planned with Palomar observatory staff that no light scatter to affect the observatory, worried of impact of the LED panels. Also worried of the impact of the surrounding community. Would appreciate scheduling the dimming of the lights at 11:00pm daily. Please consider reducing the size of the sign to maintain sense of cooperation and maintain relationship. Dan McKenna, the Observatory Scientist would like to help and offer his assistance in making the sign compliant with the dark sky ordinance.

Joe let the group know that the sign is a conceptual design at this time and any sign that is built will 100% comply with the dark sky ordinance. Appreciate and welcome the suggestions on the darkening hours.

Steve Hutchison, Valley Center Planning Group

Support and reiterate the comments of other planning group attendees and Cal Tech, believe in the community interest and the work of the Palomar Observatory. Valley Center has strived for many years to continue to be a rural community and that sign is way too big and puts out too much light, too much, don't want to be like Las Vegas.

Tina Davis, Cuca Ranch Community in Pauma Valley

Don't understand the need for a large sign, locals and people riding on bus know where you are. Don't understand the need, the light won't stay on the site. This is a big point of contention in the community.

Russ Collins, Valley Center Resident

CEO of major real estate marketing firm located in San Diego, marketing is my life, do you really need that sign that size. Congrats on your successful business just a little too much with the sign.

Borris Broden, Valley Center Resident

Lives on the hill just north of casino, can see the casino in the morning when on a walk, they are bright. Cannot see from house at night but sign will be too big and will be able to see, please reconsider.

Jerry W., Cuca Ranch Community in Pauma Valley

The sign is my concern, already see the glow of the casino lights through the marine layer. It's all about the sign.

Sue Berg, Valley Center Resident

I haven't talked to one person in favor of this. I taught environmental science to kids and this is against everything that is acceptable. Where can you go to be in a dark place anymore.

SECTION 3.0

RESPONSES TO COMMENTS RECEIVED

SECTION 3.0

RESPONSES TO COMMENTS RECEIVED

3.1 GENERAL RESPONSES

Several similar concerns were raised by multiple commenters and/or were referenced in multiple comments. These included:

1. The size and brightness of the proposed welcome sign, including its potential impacts on the Palomar Observatory;
2. The adequacy of proposed mitigation measures for project traffic impacts; and
3. Whether the Casino will have adequate security resources for the expanded facility.

Therefore, three general responses have been prepared to comprehensively address all comments regarding welcome sign impacts, traffic impacts and mitigation, and security.

GENERAL RESPONSE 1: WELCOME SIGN IMPACTS

The Tribe understands and shares the community's interest in minimizing light pollution, and appreciates the importance of the work performed at the Palomar Observatory. Based on the comments received during the public comment period and at the public meeting, the Tribe has decided not to construct the welcome sign as described in the EE, and instead will begin a new design process with the goal of developing a design that reduces the potential for off-reservation impacts. The new welcome sign would be significantly less than 58 feet tall and would comply fully with the County's dark sky ordinance. The Tribe is committed to meeting with representatives from the Palomar Observatory before the redesign process is complete to ensure that the welcome sign's impacts on the operations of the Observatory are minimized.

GENERAL RESPONSE 2: TRAFFIC IMPACTS AND MITIGATION

The EE and the Traffic Impact Analysis (TIA), which was included as Appendix D to the EE, analyzed both direct and cumulative impacts to off-reservation roads that would be caused by the proposed project. Determinations of significance in the EE and TIA were based on the County's "Guidelines for Determining Significance" updated on August 24, 2011. As described in the EE, two road segments (Valley Parkway between City of Escondido City Limits and Beven Drive, and Valley Center Road between Cole Grade Road and N. Lake Wohlford Road) were found to experience a significant reduction in level of service (LOS) in the opening year due to the addition of project traffic. While these two

segments currently operate at an unacceptable LOS (F and E, respectively), the project-related impacts were found to be significant under County guidelines because the proposed project would add over 1,000 average daily trips (ADT) to each segment. One additional road segment (Valley Center Road east of N. Lake Wohlford Road) was found to experience a significant reduction in LOS in the cumulative year. The current project to widen the affected segment of Valley Parkway to four lanes would increase the capacity of this segment and would reduce the impacts of the proposed project on Valley Parkway to less-than-significant levels; thus, no mitigation for this segment is necessary. Mitigation was proposed in Sections 3.6.3 and 3.7.3 of the EE that would reduce the opening year and cumulative impacts to the affected segments of Valley Center Road to less-than-significant levels.

As described in the EE, one intersection (Valley Center Road and S. Lake Wohlford Road) was found to experience a project-related reduction in LOS on opening year weekends, and two additional intersections were found to experience a project-related reduction in LOS in the cumulative year both on weekends and weekdays (refer to Tables 13 and 17 in the EE). These impacts are considered less than significant under the County's guidelines because no intersections experienced a reduction in LOS to E or F. Similarly, while the proposed project would cause six street segments aside from those identified above to experience a reduction in LOS in the cumulative year (refer to Table 18 in the EE), project-related impacts to these segments were determined to be less-than-significant under the County's guidelines because none of the six segments would operate at an LOS of E or F with the addition of project traffic.

The TIA provided three potential mitigation options for reducing the opening year and cumulative impacts to the affected segments of Valley Center Road to less-than significant levels: the Tribe's construction of a right-turn lane on Valley Center Road at the intersection of Valley Center Road and Cole Grade Road, or a pro rata contribution to the construction if other developments are also conditioned to provide this improvement; the Tribe's payment of a TIF to the County that is proportional to the contribution of proposed project traffic to the segments' exceedances of County LOS standards; or the combination of partial payments to the TIF and to the construction of the right-turn lane. As stated in Sections 3.6.3 and 3.7.3 of the EE, any of the three options could reduce the proposed project's traffic-related impacts to less-than-significant levels. However, the Tribe is also willing to meet with the County to consider alternative mitigation options, including a fair-share contribution to the widening and realignment of Valley Center Road between Cole Grade Road and "New Roads 14/15," or the widening and/or restriping of Valley Center Road between "New Roads 14/15" and N. Lake Wohlford Road. The widening of N. Lake Wohlford Road south of Valley Center Road to a four-lane road is not necessary to reduce the proposed project's off-reservation impacts to less-than-significant levels, as the TIA did not identify any significant impacts caused to that segment of road by project-related traffic.

GENERAL RESPONSE 3: SECURITY

The Casino's security staffing levels are adequate under current conditions, and the addition of five security personnel would be sufficient to accommodate any foreseeable increase in patronage and on-site

issues caused by the proposed project. Additionally, as described in Section 3.5.2 of the EE, the recently created San Pasqual Tribal Police Department (SPTPD) would continue to provide law enforcement services to the Casino property and the surrounding on-Reservation areas. SPTPD works jointly with other local, state, and federal law enforcement agencies, including the California Highway Patrol (CHP) and San Diego County Sheriff's Department (SDCSD), and would continue to work with these agencies to identify and prevent on- and off-reservation criminal activity.

The proposed welcome sign would be located on land owned by the Tribe that is less than 0.9 miles by road from the Casino entrance and less than 1.2 miles by road from SPTPD headquarters. The location of the proposed welcome sign is within the current service area of SPTPD, and the sign would be regularly patrolled and inspected for any vandalism or damage by SPTPD officers.

3.2 RESPONSES TO WRITTEN COMMENTS

RESPONSE TO COMMENT LETTER 1: COUNTY OF SAN DIEGO

- 1-1 The EE provided a detailed analysis of potentially significant opening year and cumulative off-reservation impacts related to aesthetics, air quality/greenhouse gas emissions (climate change), water resources, public services, and transportation/traffic. As described in Section 3.1 of the EE and in the Off-reservation Environmental Impact Analysis Checklist, which was included as Appendix A to the EE, impacts to agricultural resources, biological resources, cultural resources, geology and soils, noise, population and housing, land use, hazards and hazardous materials, land use, mineral resources, population and housing, recreation, and utilities and services systems were determined to be less than significant and did not warrant detailed analysis. The County's guidelines for determining significance were incorporated where applicable in the analysis of impacts in the EE. The comment encouraging the hiring of County-approved environmental consultants is noted.
- 1-2 Refer to **General Response 1 – Welcome Sign Impacts** regarding the design of the proposed welcome sign.
- 1-3 Refer to **General Response 2 – Traffic Impacts and Mitigation** regarding impacts to Valley Center Road and alternative traffic mitigation options.

RESPONSE TO COMMENT LETTER 2: VALLEY CENTER COMMUNITY PLANNING GROUP

- 2-1 Refer to **General Response 1 – Welcome Sign Impacts** regarding the design and aesthetic impacts of the proposed welcome sign. Refer to **General Response 3 – Security** regarding potential vandalism of the welcome sign.

- 2-2 Refer to **General Response 2 – Traffic Impacts and Mitigation** regarding alternative traffic mitigation options and the significance criteria used to evaluate traffic impacts.
- 2-3 Refer to **General Response 3 – Security** regarding security staffing levels.

RESPONSE TO COMMENT LETTER 3: DEPARTMENT OF TOXIC SUBSTANCES CONTROL

As described in the Off-reservation Environmental Impact Analysis Checklist, which was included as Appendix A to the EE, the project was determined to not have the potential to cause significant off-reservation impacts related to hazards and hazardous materials. Construction of the proposed project would occur in graded and paved areas in which there are no known recognized environmental conditions. The current and historic uses of the proposed project site as a Casino, hotel, and ancillary facilities are not associated with the release of hazardous wastes and substances that would have the potential to cause significant off-reservation impacts. The comment regarding the identification and disposal of lead-based paints or products, mercury, and asbestos-containing materials during demolition is noted. Mitigation measures were included in Sections 3.4.3 and 3.5.3 of the EE to reduce any off-reservation impacts associated with the disposal of hazardous materials. No materials containing polychlorinated biphenyls are known to occur in the area of the proposed project.

RESPONSE TO COMMENT LETTER 4: STATE CLEARINGHOUSE

Receipt of the letter from the State Clearinghouse is acknowledged.

3.3 RESPONSES TO COMMENTS FROM PUBLIC MEETING

With the exception of Mr. Smith, whose spoken comments reiterated those from his written letter (Comment Letter 2) and have been responded to above (refer to **General Response 1 – Welcome Sign Impacts**, **General Response 2 – Traffic Impacts and Mitigation**, and **General Response 3 - Security**), all eleven individuals who provided spoken comments at the public meeting exclusively discussed potential impacts of the proposed welcome sign. Therefore, refer to **General Response 1 – Welcome Sign Impacts**.

SECTION 4.0

REPORT PREPARATION

SECTION 4.0

REPORT PREPARATION

San Pasqual Casino Development Group, Inc.

President/ CEO: Joe Navarro

Analytical Environmental Services

Project Director: David Zweig, P.E.

Technical Staff: Ryan Gallagher
Dana Hirschberg

APPENDICES

APPENDIX A

NEWSPAPER NOTICE OF PUBLIC COMMENT MEETING

Valley ROADRUNNER

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29115 Valley Center Road, Suite L,
Valley Center, CA 92082
(760) 749-1112
FAX (760) 359-5815

**Analytical Environmental Services
1801 7th Street #100
Sacramento, CA 95811**

PROOF OF PUBLICATION

**State of California
County of San Diego**

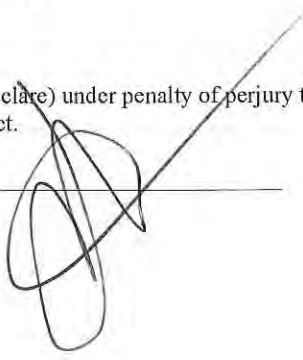
I am a citizen of the United States and a resident of the County aforesaid: I am over the age of 18 years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the publisher of the Valley Roadrunner, a newspaper of general circulation, published weekly in the community of Valley Center, County of San Diego, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of April 29, 1977, Case number N 8284; that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

Published in: VALLEY ROADRUNNER
Run Dates: 01/04/2018

Executed on: January 4, 2018

At Valley Center, CA

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signature: 

NOTICE OF AVAILABILITY VALLEY VIEW CASINO EXPANSION PROJECT SAN DIEGO COUNTY, CALIFORNIA

The San Pasqual Band of Mission Indians (Tribe) proposes to expand the Tribe's existing Valley View Casino on reservation lands in San Diego County.

The proposed project consists of expanding the existing Casino by approximately 40,000 square feet, thereby creating space for restaurants, offices, an expanded gaming floor, and other facilities. The proposed project does not involve the installation of additional gaming devices in the short term. An Environmental Evaluation that assesses the potential for off-reservation environmental impacts from the expansion project has been prepared consistent with the Tribe's Environmental Impacts Ordinance and the Tribal-State Gaming Compact.

This document is available for review for a 30-day period from January 8, 2018 to February 7, 2018. Comments should be addressed to: San Pasqual Casino Development Group, Inc., c/o Carly Lucero, 16300 Nyemii Pass Road, Valley Center, CA 92082.

A public meeting will be hold on February 8, 2017 at 5:00 p.m. to receive comments on the project. The meeting will be held in the Event Center of the Valley View Casino & Hotel, 16300 Nyemii Pass Road, Valley Center, CA. Only persons 21 years of age or older are permitted into the Casino property. Comments made during the public review period will be considered by the Tribe in determining how to proceed with the proposed project.

Copies of the Environmental Evaluation will be available beginning January 8, 2018 at the Valley Center Library, 29200 Cole Grade Road, Valley Center, CA (telephone: 760-749-1305) and online at analyticalcorp.com.