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*Making Conservation
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Governor's Office of Planning & Research

June 17, 2019

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IGR/CEQA Review
Sha-5-12.15

STATE CLEARINGHOUSE

Redding Rancheria Fee to Trust
and Casino Project DEIS
SCH #2016114004

Mr. Chad Broussard
Bureau of Indian Affairs (BIA)
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Dear Mr. Broussard:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Redding Rancheria Fee to Trust and Casino Project. The proposal is to acquire approximately 232 acres from fee land into trust on which the Redding Rancheria proposes to develop a casino resort. The facilities would include an approximately 69,541-square foot (sf) casino, 250-room hotel, conference and event centers, restaurants, retail facilities, parking, and other supporting facilities. The project is southwest of the South Bonnyview/Churn Creek Road/Interstate 5 (I-5) interchange accessed through the City of Redding and located in unincorporated Shasta County.

The current and future needs of the transportation system and the affected I-5 freeway interchange are addressed in the "Bonnyview Interchange (Exit 675) Improvements Project Study Report – Project Development Support" (PSR-PDS Preferred Alternative 4B) prepared by Caltrans for the City of Redding. The traffic evaluations were prepared by Omni-Means/GHD. The study was completed in October 2017. All future improvements to the interchange must be consistent with the study unless demonstrated to be equivalent or superior to the study results.

Caltrans reviewed the DEIS and transportation study (TIS). We also reviewed the TIS prepared in 2017. Our comments and concerns are included as Attachment "A."

Caltrans recognizes the unique sovereign status of the Redding Rancheria and is committed to strengthening the Government-to-Government relationship with the Redding Rancheria. If you have any questions, please call me at (530) 225-3369 or email at marcelino.gonzalez@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MG' with a stylized flourish.

MARCELINO GONZALEZ
Local Development Review
Office of Community Planning
District 2

ATTACHMENT A
Redding Rancheria Fee to Trust and Casino Project DEIS

DEIS:

Section 3.8 - Existing (2016) Conditions - This section should include the following projects that were known in 2016 and are currently under construction:

- Redding Area Six Lane (RASL) project to widen I-5 to 6-lanes currently under construction, completion expected in 2022.
- Northbound onramp widening at the Bonnyview interchange is currently under construction, will provide dual left turns onto the northbound on ramp from eastbound South Bonnyview, completion expected in 2019.

Section 4.8 (p. 4.8.14) Transit, Bicycle, and Pedestrian Facilities – The inclusion of sidewalks and shoulders with adequate widths for bicycles from Bechelli Lane to the facilities will provide employees and patrons with the ability to make transportation mode choices to reduce air quality, greenhouse gas, and vehicle miles travelled (VMT) impacts. The Rancheria should also continue to work with the transit agency to extend bus stops in proximity to the facilities for similar reductions in impacts.

Section 4.8 Trip Generation

- 1500 seat amphitheater trip generation is not included and it is not shown on the site plans. The project description in the TIS also excludes the 1,500 seat amphitheater identified in the DEIS. A separate analysis of the proposed days of the week and hours should be prepared to address impacts to the interchange and street network. The frequency of events and whether any other onsite events occur concurrently should be disclosed.
- 1800 seat Event Center trip generation assumes 70% already there and 30% new trips. Trip generation should use an origin-destinations study using wifi data or cell phone data as mentioned other places in the report to support this assumption.
- If 2025 is opening day a 20-year projection using 2045 should be included.
- The Bonnyview PSR-PDS estimated the casino project traffic prior to knowing the actual scope of the Strawberry Fields site – for the most part the numbers are very similar. However, at intersection #3 the Bonnyview PSR-PDS used 464 trips into the project site from westbound S. Bonnyview compared to the DEIS value of 507 for Friday and 653 for Saturday. 507 is 10% higher than the PSR-PDS for Friday while the 653 is 40% higher than the PSR-PDS for Saturday. Trips into the project site from an eastbound right at intersection #3 – the PSR-PDS used 140 while the DEIS used 136 for Friday and 176 for Saturday. Trips out of the project site are as follows – the PSR-PDS used 314 for right turn onto S. Bonnyview compared to the DEIS value of 358 for Friday and 383 for Saturday. 358 is 14% more than the PSR-PDS for Friday while the 383 is 22% more than the PSR-PDS.
- Split for Distribution with North-South access is not discussed on Figure 21

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- Saturday peak at intersection #3 is 653 using all access from the North. Study shows on Figure 21 that 37% choosing south access (240) and 63% choosing north access (413). Split seems too high choosing the south access. 37% means all of northbound I-5 (100%) plus all of northbound 273 (100%) will exit at Knighton (Exit 673) then proceed to Churn Creek Road, then to Smith Road.
- For northbound I-5, our judgement is 75% of travelers will exit at Knighton, and 25% will continue on to the Bonnyview interchange (Exit 675).
- For northbound 273, our judgement is 75% will go to northbound I-5, then exit at Knighton, and 25% will continue on 273 and head east on S Bonnyview Road. Previous split of 240 times 75% equals 180 now choosing the south access on Saturday PM. Please adjust the numbers using that assumption.

- The following intersections should be added to the traffic study – for the north + south access alternatives:
 - o Knighton Road at SB ramps
 - o Knighton Road at NB ramps
 - o Knight Road at Churn Creek Road
 - o Sunny Hill Road at Bechelli

- The site development plan should consider a frontage road on the west side of I-5 connecting from Knighton Road to Bonnyview Road to develop a transportation network by 2045 or sooner.

- Chart for Intersection #25 is not correct. #25 throughout the report shows project traffic going the wrong way onto southbound I-5, please correct.

- Current site plan shows about 36 spaces for RVs and/or trucks on the north side. The analysis does not account for large trucks and the street network is currently not designed for large trucks. The Bonnyview area (intersections #3, #4, #5, #6, and #7) of the system cannot handle a significant amount of trucks. Any site amenities attracting large trucks must be analyzed and accounted for or it will require a future analysis identifying the changes needed to the transportation system to accommodate large trucks.

Construction Access – Large construction trucks and equipment should be routed from Smith Road to reduce congestion in the Bonnyview area during construction.

TIS Comments:

- The updated TIS has revised the study dates to 2025 and 2040 vs the 2017 report's 2020 and 2035. Slight adjustments to traffic volumes resulted.
- California Gold is still listed as a 2040 forecasted development when it is currently under construction. Caltrans guidance for determining fair share cost requires that all existing and approved projects be included in the 2025 (Te) volume. Excluding this volume reduces the fair share percentage.
- TIS Table 16, either the amphitheater volume should be added, or there should be a description explaining why it was not.
- TIS Table 16, note 5 lists the maximum number of attendees/seats as 672 people, this does not correspond with the table.

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- The fair share of most intersections has dramatically changed from 2017. It is suggested that a spreadsheet be included which allows easy cross referencing to check values. Unable to match the calculations (example Intersection #4).
- 9 Synchro outputs are for intersections 3-7 are missing for the 2040 condition.
- The TIS states new signal or roundabout for north/oak (Anderson Alternative), whereas the DEIS states only a signal.