

4.7 SOCIOECONOMIC CONDITIONS AND ENVIRONMENTAL JUSTICE

This section identifies the impacts to socioeconomics and environmental justice that would result from the development of each alternative described in **Section 2.0**. Impacts are measured against the environmental baseline presented in **Section 3.7**. Indirect and cumulative impacts are identified in **Section 4.14** and **Section 4.15**, respectively. Socioeconomic mitigation measures are presented in **Section 5.2.6**.

SIGNIFICANCE CRITERIA

An impact to socioeconomics from the implementation of one of the project alternatives would be significant if it would:

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere;
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere;
- Substantially negatively alter the ability of the local economy to perform at existing levels, from the effects of substantial losses to businesses (for example revenues or employees) or governments (for example tax revenues); or
- Negatively alter the ability of people to obtain public health and safety services.

An impact to environmental justice from the implementation of one of the project alternatives would be significant if:

- It disproportionately and adversely affects an identified minority or low-income community, or Indian tribe.

ANALYSIS METHODOLOGY

Socioeconomic Impacts

To determine the impacts of the project alternatives on socioeconomic conditions, the economic effects of temporary construction and ongoing operational activities of each alternative were measured. Since socioeconomic effects would be most pronounced in the vicinity of the project site, the scope of analysis focuses on impacts to Contra Costa County (County), including the City of Richmond (City). Impacts from construction would be a one-time occurrence, while those from operation would be generated continuously after opening. Much of the analysis presented herein relies on data presented in the Economic Impact and Growth Inducing Study included as **Appendix T**. Economic effects in this analysis are quantified for Contra Costa County using the Impact Analysis for Planning, (IMPLAN) model. The IMPLAN analysis was developed by the U.S. Department of Agriculture Forest Service, and the

Minnesota Implan Group has maintained a database since 1987 at the University of Minnesota. For the proposed project, the Input-Output/Social Accounting Matrix Model (I-O/SAM) was employed, which depicts how the total output of each industry in an economy depends on inter-industry demands and final demands by putting transactions in a matrix framework. These effects are measured by using a series of multipliers. The I-O/SAM analysis relies on data compiled by IMPLAN for Contra Costa County for 2002, the latest version available at the time of the analysis.

Environmental Justice Impacts

To determine the impacts of the project alternatives on environmental justice, the location and status of minority and low-income communities of concern, as identified in **Section 3.7**, are compared to the effect and nature of a project alternative's impacts. *Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses* provides the following direction on how to analyze the impacts of actions on low-income and minority populations:

Under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population (USEPA, 1998).

4.7.1 ALTERNATIVE A – MIXED-USE TRIBAL DESTINATION RESORT AND CASINO

Socioeconomic Impacts

4.7.1 Implementation of Alternative A would generate substantial economic activity in the regional economy from expenditures on goods and services associated with construction and operation of the project. This would be a beneficial impact.

Expenditures on goods and services for construction and operational activities would generate substantial direct economic output, as well as indirect and induced economic output. Direct output would result from money spent on activities for construction and operational activities of the project. Indirect output would result from expenditures on goods and services by businesses that receive funds directly from the construction and operation of Alternative A. Induced output would result from expenditures on goods and services by employees directly generated from construction and operation of Alternative A.

Construction

Expenditures on goods and services from construction of Alternative A were calculated from estimated costs for construction, investment in furniture, fixture and equipment (“FF&E”), other

equipment, various business and consulting fees, and pre-opening expenses. Under Alternative A, construction activities are estimated to cost approximately \$1.245 billion, which is expected to generate a one-time total output of approximately \$3.264 billion within the County (excluding financing-related costs) (**Table 4.7-1**). Direct output is estimated to total approximately \$1.428 billion, of which approximately \$1.084 billion (76 percent) is attributed to the construction industry. Indirect and induced outputs were estimated to total \$952 and \$885 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

TABLE 4.7-1
ONE-TIME CONSTRUCTION ECONOMIC IMPACT (MILLIONS)

Construction	Alternative			
	A	B	C	D
Cost	\$1,245	\$1,514	\$686	\$1,003
<i>Direct Output (Industry)</i>				
Construction	\$1,084	\$1,317	\$658	\$1,090
Wholesale Trade	\$145	\$145	\$60	\$16
Manufacturing	\$80	\$80	\$80	\$0
Other	\$119	\$142	\$70	\$26
Direct Total	\$1,428	\$1,684	\$869	\$1,132
<i>Other Output</i>				
Indirect	\$952	\$1,128	\$608	\$785
Induced	\$885	\$1,050	\$531	\$734
Total Output	\$3,264	\$3,862	\$2,008	\$2,652

Source: Gaming Market Advisors, 2008.

Operation

Expenditures on goods and services from the operation of Alternative A were calculated from revenue projections for the first complete year of operation, currently estimated to be 2012. Under Alternative A, gross revenue for 2012 was estimated to be \$959 million, which is expected to generate an annual total output of approximately \$1.552 billion within the County (**Table 4.7-2**). Direct output was estimated to total approximately \$767 million, of which approximately \$667 million (87 percent) would be attributed to the gaming and entertainment industry. Indirect and induced outputs were estimated to total \$325 and \$460 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

TABLE 4.7-2
ANNUAL OPERATIONAL ECONOMIC IMPACT (MILLIONS)

Operation	Alternative			
	A	B	C	D
Revenue (Projected 2012)	\$959	\$964	\$737	\$32
<i>Direct Output (Industry)</i>				
Gaming & Entertainment	\$667	\$709	\$558	\$0
Accommodation & Food Services	\$49	\$52	\$20	\$21
Retail	\$36	\$38	\$2	\$10
Other	\$15	\$5	\$4	\$1
Direct Total	\$767	\$804	\$583	\$32
<i>Other Output</i>				
Indirect	\$325	\$339	\$247	\$16
Induced	\$460	\$482	\$354	\$17
Total	\$1,552	\$1,625	\$1,183	\$64

Source: Gaming Market Advisors, 2008.

A portion of economic activity would not be new to the regional economy. Some revenue generated under Alternative A would come from spending that would have otherwise occurred at other local businesses, such as card rooms, horse tracks, and hotels. Therefore, the spending would have been substituted or transferred from one venue to another. Given the large scale of development proposed under Alternative A, a negligible portion of revenue would be transferred from other existing local businesses.

The City's close proximity to the project site would result in Richmond's ability to capture a large portion of output from direct, indirect, and induced expenditures on goods and services associated with both construction and operational activities. The level of this impact on the City would be defined to a large extent by existing businesses in Richmond and the willingness of businesses to operate in the City in the future to accommodate ongoing activities from Alternative A. This would be a *beneficial impact*.

4.7.2 Implementation of Alternative A would generate substantial employment opportunities and wages in the regional economy from construction and operational activities. This would be a beneficial impact.

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities

and wages. The source of direct, indirect, and induced employment opportunities and wages would be similar to those for economic output, as discussed above.

Construction

Under Alternative A, investment in construction activities would generate a one-time total of approximately 18,670 employment opportunities within the County (**Table 4.7-3**). The number of employees would be equivalent to the number of person-years available from wages. A person-year is defined as the amount of labor one full-time employee can complete in a calendar year. For example, two half-time employees working for a year would constitute one person-year. Direct output was estimated to total approximately 9,305 employment opportunities, of which approximately 7,060 (76 percent) would be attributed to the construction industry. Indirect and induced employment opportunities were estimated to total 3,754 and 5,611, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County.

TABLE 4.7-3
ONE-TIME CONSTRUCTION EMPLOYMENT & WAGE IMPACTS

Construction Impact	Alternative			
	A	B	C	D
Employment (Person-Years)				
<i>Direct (Industry)</i>				
Construction	7,060	8,578	4,288	7,101
Wholesale Trade	730	730	304	82
Accommodation & Food Services	646	814	505	267
Other	869	1,065	466	77
Direct Total	9,305	11,187	5,563	7,527
<i>Other</i>				
Indirect	3,754	4,447	2,345	3,065
Induced	5,611	6,660	3,367	4,659
Total	18,670	22,295	11,276	15,251
Wages (Millions)				
<i>Direct (Industry)</i>				
Construction	\$354	\$430	\$215	\$356
Wholesale Trade	\$57	\$57	\$24	\$6
Scientific & Technical Services	\$25	\$25	\$12	\$3
Other	\$30	\$38	\$22	\$8
Direct Total	\$465	\$550	\$272	\$373
<i>Other</i>				
Indirect	\$193	\$228	\$122	\$158
Induced	\$246	\$292	\$147	\$204
Total	\$903	\$1,070	\$541	\$735

Source: Gaming Market Advisors, 2008.

Employment opportunities generated from construction and operation of Alternative A would result in substantial wage generation. Wage totals include hourly and salary payments as well as benefits including health and life insurance and retirement payments. Under Alternative A, investment in construction activities would generate one-time total wages of approximately \$903 million within the County (**Table 4.7-3**). Direct wages were estimated to total approximately \$465 million, of which approximately \$354 million (76 percent) would be attributed to the construction industry. Indirect and induced wages were estimated to total \$193 and \$246 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Operation

Employment opportunities generated from the operation of Alternative A would consist primarily of entry-level positions, but also includes mid-level and management positions. **Table 4.7-4** shows examples of employment opportunities typically offered by tribal casino and resort facilities. Average salaries offered are expected to be consistent with or greater than those of other tribal gaming facilities and competitive in the local labor market. Existing agreements between the Tribe and City provide for compliance with living wage, first-source hiring and other local worker benefits.

TABLE 4.7-4
TYPICAL TRIBAL CASINO AND RESORT EMPLOYMENT OPPORTUNITIES

Casino administration	Hotel administration	Food & beverage administration	Sales & marketing operations
Casino services	Hotel services		
Casino slot operations	Hotel management	Food & beverage operations	Financial services
Table games	Hotel facilities	Restaurant services	Support services
Entertainment operations	Hotel marketing	Culinary Services	Security services
Casino credit	Housekeeping services	Human resources	Surveillance

Source: AES, 2008.

Under Alternative A, investment in operation activities would generate an annual total of approximately 16,771 employment opportunities within the County (**Table 4.7-5**). Direct output was estimated to total approximately 11,991 employment opportunities, of which approximately 10,736 (90 percent) would be attributed to the gaming and entertainment industry. Indirect and induced employment opportunities were estimated to total 2,046 and 2,734, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County

Under Alternative A, investment in operation activities would generate annual total wages of approximately \$481 million within the County (**Table 4.7-5**). Direct wages were estimated to total approximately \$269 million, of which approximately \$233 million (87 percent) would be attributed to the gaming and entertainment industry. Indirect and induced wages were estimated to total \$83 and \$128 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

TABLE 4.7-5
ANNUAL OPERATIONAL EMPLOYMENT & WAGE IMPACTS

Operational Impact	Alternative			
	A	B	C	D
Employment (Person-Years)				
<i>Direct</i>				
Gaming & Entertainment	10,736	11,407	8,973	0
Accommodation & Food Services	766	814	306	326
Retail	381	405	21	108
Other	109	47	40	11
Direct Total	11,991	12,673	9,340	445
<i>Other</i>				
Indirect	2,046	2,143	1,604	61
Induced	2,734	2,866	2,101	99
Total	16,771	17,682	13,045	605
Wages (Millions)				
<i>Direct</i>				
Gaming & Entertainment	\$233	\$248	\$195	\$0
Accommodation & Food Services	\$16	\$17	\$6	\$7
Retail	\$15	\$16	\$1	\$4
Other	\$5	\$2	\$1	\$0
Direct Total	\$269	\$283	\$204	\$11
<i>Other</i>				
Indirect	\$83	\$87	\$64	\$3
Induced	\$128	\$135	\$99	\$5
Total	\$481	\$504	\$367	\$19

Source: Gaming Market Advisors, 2008.

To account for the dynamics involved with filling the generated employment opportunities, calculations were made for the number of employment opportunities that would be filled by persons in the County (in-market labor) and those that would be filled by persons outside the County (out-of-market labor). Out-of-market labor would result from skilled jobs that cannot be

filled by in-market labor, and laborers commuting to the project from surrounding counties. Skilled labor would be in demand, such as property and casino managers, as well as those with previous gaming experience. Based on the population density of the region and the dynamics of the local labor market, it was found that Alternative A would demand skilled labor at a rate of 7.5 percent for direct employment opportunities and five percent for indirect and induced employment opportunities (**Appendix T**). Accordingly, Alternative A would result in the demand for skilled labor of 1,138. The high population density of the County and surrounding areas, plus the area’s access to multiple forms of mass transportation allows the project to draw employees from both within and outside of the County. To capture this dynamic it was assumed that 70 percent of the total employment opportunities would be filled by out-of-market labor (**Appendix T**). Accordingly, Alternative A would result in a demand for out-of-market labor of approximately 11,740 persons (**Table 4.7-5**). Considering both skilled labor and non-skilled out-of-market labor, Alternative A would result in demand for in-market labor of approximately 3,893 persons.

The 2006 labor force in the County consisted of 518,500 persons and an unemployment rate of 4.3 percent (22,296 persons) (**Section 3.7**). Since 2000, the labor force slightly increased each year and the unemployment rate has increased by an average of 4.2 percent per year. Based on County labor market data from 2001 to 2006 and utilizing the average annual growth rate and the future valuation method, the 2012 County labor market was projected to have a labor force of 530,551 and an unemployment rate of 4.3 percent (22,704 persons) (**Appendix T; Table 4.7-6**).

TABLE 4.7-6
PROJECTED 2012 CONTRA COSTA COUNTY LABOR MARKET

Labor Market	No Project	Alternative			
		A	B	C	D
Labor Force	530,551	531,120	531,327	530,994	530,571
Unemployment (Rate)	22,704 (4.3%)	18,811 (3.5%)	18,601 (3.5%)	19,676 (3.7%)	22,704 (4.3%)

Source: Gaming Market Advisors, 2008.

Note: 2012 Labor market considers direct, indirect, and induced employment.

The impact of Alternative A on the 2012 County labor market was demonstrated by evaluating the amount of in-market labor demanded to the amount of available labor or those unemployed. The unemployment rate of the County labor market with the incorporation of Alternative A would be 3.5 percent, compared to 4.3 percent without the development of a project (**Table 4.7-6**). Growth of the 2012 labor force is attributed to persons moving into the County to fill new employment opportunities. Additionally, with the development of Alternative A, the 2012 County labor force would be 569 persons larger than without a project. This dynamic

demonstrates that Alternative A would contribute to reducing 2012 unemployment in the County. In addition, a portion of new employment opportunities would be filled by persons in the County that are currently employed, thereby freeing up existing employment opportunities for other workers. This dynamic is dependent on several factors and was not quantified in this analysis; therefore, this analysis provides a conservative estimate.

Construction and operation of Alternative A would generate substantial temporary and ongoing employment opportunities and wages. The City's close proximity to the project site would result in the City's ability to capture a large portion of direct, indirect, and induced employment opportunities and wages. To help ensure the employment of City residents, Tribal members, and other Native Americans, the Tribe has indicated through the Municipal Services Agreement (MSA) that it will employ qualified City residents and Tribal members, and offer training programs to assist City residents, Tribal members, and other Native Americans (**Appendix C**). Under Alternative A, unemployment in the 2012 County labor market, as well as surrounding areas, would be less than without the project. This would result in employment and wages for persons previously unemployed and increases the ability of the population to provide themselves with health and safety services; thus, contributing to the alleviation of poverty among lower income households. This would be a *beneficial impact*.

4.7.3 Operation of Alternative A would generate an increase in demand for existing vacant housing from employees relocating to the County. This would be a beneficial impact.

Increased demand for housing would result from the relocation of employees from outside the County to fulfill employment opportunities generated from the operation of Alternative A. Housing demand would result from a portion of the out-of-market labor force that choose to relocate within the County. This analysis assumes that none of the in-market employees would relocate within the County, since the City and the remainder of the County are heavily urbanized and infrastructure provides easy access between cities within the County. Employment opportunities generated from construction activities would be temporary in nature; and therefore, would not generate the demand for employees to relocate to the County.

Under Alternative A, a total of 1,138 employment opportunities would be filled by the out-of-market labor force, of which 569 are expected to relocate and demand County housing. This quantity was determined by applying a rate of 50 percent to the total demand for the out-of-market labor force, which is based on staffing policies in other jurisdictions with gaming facilities (**Appendix T**).

The 2006 County housing market consisted of 389,134 units, of which 7.7 percent (29,763 units) were vacant (**Section 3.7**). Since 1990, the total number of units in the County housing market

has increased by about one and half percent per year and the vacancy rate has increased by about 5.5 percent per year. Based on County housing market data from 2001 to 2006, the 2012 County housing market was projected by calculating the average annual growth rate and utilizing the future valuation method. The 2012 County housing market was projected to have a total of 421,152 units, of which 4.7 percent (19,934 units) would be vacant (**Appendix T; Table 4.7-7**). The impact of Alternative A on the 2012 County housing market is demonstrated by evaluating the availability of 19,934 dwellings to the demand for 569 dwellings. The comparison of these values indicates that available housing could easily fulfill demand and Alternative A would not require new housing to be built. This effect would result in a slight (0.1 percent) decrease in the vacancy rate of the 2012 County housing market, which would not be a large enough change to affect housing prices (**Table 4.7-7**).

TABLE 4.7-7
CONTRA COSTA COUNTY 2012 HOUSING MARKET

Housing Market	No Project	Alternative			
		A	B	C	D
Total Units	421,152	421,152	421,492	421,152	422,252
Occupied Units	401,219	401,734	402,261	401,619	402,205
Vacant Units (Rate)	19,934 (4.7%)	19,419 (4.6%)	19,232 (4.6%)	19,533 (4.6%)	20,048 (4.7%)

Source: Gaming Market Advisors, 2008.

The 2012 County housing market, including the City, would fulfill the demands for housing under Alternative A. Indirect effects resulting from growth inducement are discussed further in **Section 4.14**. This would be a *beneficial impact*.

4.7.4 Implementation of Alternative A would result in a variety of fiscal impacts, which collectively would result in substantial revenues for federal, state, and County governments. This would be a beneficial impact.

Property values assessed by the County for parcels containing the project site totaled \$30,008,671 as of January 1, 2007. Currently the property is public land primarily owned by the City, and no tax revenue is generated. Tribes do not pay corporate income taxes on revenue or property taxes on tribal land, since trust land is not subject to local jurisdiction. Under Alternative A, annual payment of taxes on this value (approximately \$320,000 per year) would not be paid by the Tribe. The City would be fiscally impacted by increased costs to provide public services to Alternative A. However, these effects are addressed in the MSA (**Appendix C**), which provides for compensation by the Tribe to the City in the amount of \$8 million per year for the first eight years beginning with the commencement of gaming operations, and \$10 million per year thereafter.

Through the MSA, the Tribe has also agreed to contribute annual community benefit payments. For portions of the property within the area operated by the Tribe and/or casino manager these benefit payments include: \$10 per constructed hotel room per day; \$5.25 per square foot of retail sales area per year if and to the extent normal local sales taxes are not remitted to the Franchise Tax Board; and 0.285 percent of construction costs of the facilities per year, such amount being increased by two percent per year. For all other portions of the property these payments include: \$7 per constructed hotel room per day; \$7.50 per square foot of retail sales area per year if and to the extent normal local sales taxes are not remitted to the Franchise Tax Board; and if and to the extent normal leasehold improvement taxes are not collected by the County, 0.285 percent of the construction costs of the facilities per year, such amount being increased by two percent per year. Furthermore, the Tribe also agreed to pay an amount equal to ten percent of the annual cost of utilities that the Tribe would use, including electric, gas, telephone, and cable.

The federal, state, county, and local governments would receive substantial tax revenues from sources including taxes on employee compensation, household expenditures, corporate activities, and proprietary income (**Table 4.7-8**). Specific tax revenues for federal, state, and County governments were determined using 2002 industry data for Contra Costa County in the I-O/SAM model. Appendix D of **Appendix T** provides a description of these specific tax categories. A portion of these taxes collected at the State level, such as motor vehicle taxes, would be captured by county and local jurisdictions, but tracing which local areas would receive the taxes is outside the scope of the I-O/SAM model. The County would additionally receive substantial tax revenue from indirect business taxes, which primarily consist of excise and sales taxes paid by individuals to businesses (**Table 4.7-9**). These taxes are captured by applying County and municipal tax rates to new expenditures in the County.

TABLE 4.7-8
OVERALL TAX REVENUES (MILLIONS, ONE-TIME)

Jurisdiction	Alternative			
	A	B	C	D
<i>Construction</i>				
Federal	\$134	\$159	\$80	\$108
State/Local	\$144	\$168	\$84	\$105
<i>Operation</i>				
Federal	\$72	\$75	\$55	\$3
State/Local	\$98	\$103	\$74	\$4
State Gaming Tax	\$163	\$163	\$138	\$0

Source: Gaming Market Advisors, 2008.

For Alternative A, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, County, and local governments. Construction would result in an estimated \$134 million in federal tax revenues, \$144 million in state/county/local government tax revenues, and \$103 million in County/local government tax revenues. Operation would result in an estimated \$72 million in federal tax revenues, \$98 million in state/local tax revenues, and \$86 million in County/local government tax revenues.

TABLE 4.7-9
INDIRECT BUSINESS TAX REVENUES (MILLIONS, ONE-TIME) ¹

Jurisdiction	Alternative			
	A	B	C	D
<i>Construction</i>				
County/Local	\$103	\$118	\$59	\$67
<i>Operation</i>				
County/Local	\$86	\$90	\$67	\$4

Source: Gaming Market Advisors, 2008.

The State would also receive substantial revenue from gaming taxes. This analysis assumes the State would ask for gaming taxes paid in the amount of 20 percent of gross gaming revenues (**Appendix T**). Under Alternative A, gross revenue was projected to total \$813 million, which would result in gaming taxes paid to the State of approximately \$163 million (**Table 4.7-9**).

Impacts due to the loss of State, County, and local tax revenues would be more than offset by payments provided by the Tribe to the City, tax revenues generated from activities associated with construction and operation, and gaming taxes.

4.7.5 Alternative A would provide another opportunity for gambling to pathological and problem gamblers, which is expected to increase the rate of pathological and problem gamblers within ten miles of the project site. This would be a potentially significant impact.

Significance After Mitigation

The implementation of **Mitigation Measure 6-1** would reduce potential pathological and problem gambling impacts to *less-than-significant* levels.

Impact Discussion

Gambling, in one form or another, is now legal in every state except Hawaii and Utah. According to a National Gambling Impact Study Commission (NGISC) study, approximately 86 percent of Americans report having gambled at least once during their lifetimes and 63 percent of Americans

report having gambled at least once during the previous year (NGISC, 1999). This estimate is based on participation in all forms of gambling including lotteries, poker, internet gambling, sports betting, and casino gambling.

As described in **Table 4.7-10**, behaviors of casino customers can be broken down into five categories. Gaming customers are motivated to visit a casino for a variety of reasons, and some of those reasons may be viewed as criteria that define one as a problem gambler.

TABLE 4.7-10
FIVE BEHAVIORS OF CASINO CUSTOMERS

Behavior Type	Characteristics
Recognition Seekers	Small share of total players. Have high expectation of recognition from the property they patronize. The reward to the casino is an intensely loyal and frequent visitor.
Escapists	Seeks a getaway that does not resemble their everyday routine. Prefer to remain anonymous. Require minimal maintenance in the form of personal attention and complimentary services from the casino.
Reward Seekers	Driven by casino's play rewards program or promotions that compensate them for their play. Gamer will play at the casino with the best deal.
Socializers	Visit a casino to be around others. Once they identify with a particular property they become very loyal with high levels of visitation.
Professionals	Pay very close attention to the types of games a casino offers. Generate large coin handle and accumulate voluminous amounts of slot club points. Loyalty goes to the casino where they can make the most money.

Source: Gaming Market Advisors, 2006.

The American Psychiatric Association (APA) describes pathological gambling as an impulse control disorder characterized by “persistent and recurrent maladaptive gambling behavior that disrupts personal, family, or vocational pursuits. The gambling pattern may be regular or episodic, and the course of the disorder is typically chronic” (NGISC, 1999). The APA has established ten criteria for diagnosis of a pathological and problem gambler, which include preoccupation, tolerance, withdrawal, escape, chasing, lying, loss of control, illegal acts, risked significant relationship, and financial bailout. At-risk gaming behaviors typically meet one or two of these criteria; problem gamblers typically meet three to four of these criteria; and pathological gamblers typically meet at least five of these criteria. Collectively, both pathological and problem gambling are referred to as “problem gambling.”

An NGISC (1999) study reported on three studies, two completed in 1997 and one completed in 1998, noted that pathological gambling often occurs in conjunction with other behavioral problems, including substance abuse, mood disorders, and personality disorders. Even if it were

possible to isolate the effects of problem gambling on people who suffer from co-morbidity, it is difficult to then isolate the effects of casino gambling from other forms of gambling. As discussed, casino gambling is only one form of gaming. In fact, the most prevalent forms of gambling are those found in most neighborhoods: scratch lottery cards, lotto, and video lottery terminals. Thus, problem gamblers are likely to already exist in most communities. However, there are several recent studies that suggest that the presence of a casino results in a higher rate of resident problem and pathological gamblers than in counties without a casino. According to Grinols and Mustard, the Las Vegas community has a problem and pathological gambler population that is nearly six percent higher than in a non-casino community. Ricardo Gazel finds in his *Economic Impacts of Casino Gambling at the State and Local Level* (1998) article, that the incidence of problem and pathological gamblers can be between one to four percent higher in a casino community than for the general population, depending on the type of gambling that's prevalent. He finds that communities with a higher percentage of slot machines have a higher problem and pathological gambler differential than in areas with other types of gambling. Several studies suggest that these population differentials take effect for residents within a 50 mile radius of a casino, and increase to the above mentioned rates as the casino moves closer to the population. According to Welte et al. (2004), the probability of being a problem or pathological gambler roughly doubles within ten miles of a casino site. At the national level, approximately four-percent of the adult population is considered problem or pathological gamblers.

A gaming facility at the project site would provide residents of the area an opportunity for gaming that largely already exists at Casino San Pablo, a Class II gaming facility. Class II gaming facilities are allowed to include bingo and non-banked card games (played against only other players and not the house), and specifically excludes slot machines and banked card games. Therefore, some of the gaming opportunities specific to casinos and included under Alternative A already exist within ten miles of the project site. These residents would also be provided similar Class III gaming opportunities to Alternative A at the Scotts Valley gaming facility that is proposed to be located two miles from the project site. Therefore, the increase in problem gamblers within ten miles of the project site would be split between the two gaming facilities.

Although the literature states that the prevalence of problem and pathological gambling increases for all residents within 50 miles of a casino, no study estimates the rate of increase for those residents living between 11 and 50 miles of a casino. In addition, studies that estimate the increase in the problem and pathological gambling rates focus on increases in communities that do not have existing casinos. Since the existing Casino San Pablo and casinos in Sonoma County (**Figure 3.7-2**) are located within 50 miles of Alternative A, this analysis assumes that some of those residents would have already started gambling at these facilities. This assumption is appropriate because pathological and problem gamblers already have opportunities to gamble at existing facilities within 50 miles. Thus, we assume there would not be any additional problem

and pathological gambling instances for those residents living more than ten miles from the project site.

According to the report *Situational Assessment of Problem Gambling Services in California*, approximately three percent of those with severe gambling problems are referred to specialized treatment in a given year (Volberg *et al*, 2005). Available information for the Association of Problem Gambling Service Administrators (APGSA) indicates that the counselor to patient ratio for publicly funded programs varies widely. In 2003, the Oregon Problem Gambling Services program treated 1,810 patients with 30 certified counselors (APGSA, 2006). Similarly, the Nebraska Gamblers Assistance Program treated 793 individuals with 20 certified counselors. Based on the average ratio for these programs it can be assumed that approximately one counselor would be needed for every 52 persons (2,603:50).

The increase of problem and pathological gamblers within ten miles of the project site is considered a potentially significant impact. Mitigation is recommended in **Section 5.2.6** to reduce potential impacts associated with problem gambling to *less-than-significant* levels.

4.7.6 Alternative A would introduce a large number of new people into the community, which could then result in an increase in criminal incidents. This would be a less-than-significant impact.

There is a general belief that the introduction of legalized gambling into a community increases crime. An alternative argument is that legalized gaming reduces crime by reducing illegal gambling, decreasing unemployment, and stimulating the local economy. Both of these arguments are based more on anecdotal evidence than empirical evidence. Destination casinos, by their nature, increase the volume of people entering a given area. Whenever large volumes of people are introduced into a site the volume of crime would also be expected to increase. This holds true for the introduction of any large-scale development. Taken as a whole, the literature on the relationship between casino gambling and crime rates suggests that communities with casinos are as safe as communities without casinos. The National Opinion Research Center (NORC, 1999) found that insufficient data exists to quantify or determine the relationship between casino gambling within a community and crime rates.

Alternative A would be a large-scale development that would introduce a large number of patrons and employees into the community on a daily basis. The majority of these persons would be located at the project site, and given the remoteness of the project site, the majority of patrons are expected to remain within the project boundary. As a result, under Alternative A, criminal incidents would be expected to increase in the project area, particularly at the project site, as with any other development of this size. Increased criminal incidents in the project area would be

considered a potentially significant impact. With the implementation of the MSA as part of the Alternative A, contributions would be made by the Tribe to the City for public services, which would, in part, fund expansion of law enforcement services to accommodate growth and the associated increase in criminal incidents in the project area. For further discussion of law enforcement services refer to **Section 4.10**. This would reduce impacts to a *less-than-significant* level.

Environmental Justice Impacts

4.7.7 Alternative A would not result in disproportionately adverse impacts to any minority or low-income communities. This would be a less-than-significant impact.

Minority or low-income communities near the project site were identified in **Section 3.7.3**. It was determined that all census tracts identified in proximity to the project site contained minority communities, except Census Tract 3780, which contains the project site. A few of the census tracts that contained minority communities were also identified to contain potentially low-income communities. Census tracts containing minority and/or low-income communities can be generally characterized as containing dense residential land uses with some mixed commercial and industrial areas, in an urban setting. Localized impacts to the project site, such as various impacts to land and water resources, would not affect these census tracts. Increased air pollutants resulting from construction activities and vehicle emissions would be reduced to a *less than significant* levels with the implementation of **Mitigation Measures 3-1 through 3-19**; and therefore, no identified low-income or minority communities would be significantly affected. Increased traffic volumes under Alternative A would impact the existing level of service at intersections in Census Tracts 3780, 3650.01, and 3650.02. However, with the implementation of **Mitigation Measures 7-4 through 7-8**, impacts would be mitigated to a *less-than-significant* level. Alternative A would result in new problem and pathological gamblers within ten miles of the project site, where low-income and minority communities are located. However, after the implementation of **Mitigation Measures 6-1 through 6-4**, potential impacts would be reduced to a *less than significant* level, and no identified low-income or minority communities would be significantly affected. Alternative A would benefit all communities within proximity of the project site by creating employment opportunities that would demand a substantial portion of the local labor market. These communities would not be disproportionately adversely impacted. This would be a *less-than-significant* impact.

4.7.8 Alternative A would result in a variety of impacts to the competitive gaming market. The overall amount of revenue available in the competitive gaming market would increase, and a portion of revenue for Alternative A would be diverted from existing tribal casinos. No existing casino is anticipated to experience a substantial decline in revenue. This would be a less-than-significant impact.

The project site would be located in the Northern California gaming market as described in **Section 3.7.3**. To determine the impact Alternative A would have on the competitive gaming market, the expected diversion of gaming wins from the competitive gaming market was estimated. Revenue available to the competitive gaming market is limited to the Greater San Francisco market because of its proximity to the project site, while potentially affected gaming facilities considers those from the Greater San Francisco market, as well as the Greater Sacramento market, and other Northern California markets. First, the total potential revenue available in the competitive gaming market was calculated (**Appendix T**) by accounting for various factors, including the projected 2012 population within the competitive gaming market, propensity of the adult population that would visit a casino at least once in a given year, percentage of gamer's budget that would be spent in the market, average amount a gamer in a market segment would lose on average to a casino over a year period, distance from market segments to gaming facilities, and the number of gaming positions at each casino.

For the year 2012, the overall competitive gaming market revenue without Alternative A was estimated to be \$1.83 billion. Implementation of Alternative A would result in an estimated 2012 overall competitive gaming market revenue of \$2.20 billion, an increase of 20 percent. From the 2012 competitive gaming market, Alternative A was estimated to divert approximately \$174 million from the Greater San Francisco market, approximately \$218 million from the Greater Sacramento market, and approximately \$25 million from the market of other Northern California tribal casinos (**Table 4.7-11**). Those tribal casinos located closest to the project site would be expected to experience the greatest loss of revenue (**Appendix T**).

TABLE 4.7-11
COMPETITIVE GAMING MARKET (MILLIONS)

Gaming Market	Alternative		
	A	B	C
Greater San Francisco	\$174	\$174	\$139
Greater Sacramento	\$218	\$218	\$162
Other	\$25	\$25	\$13

Source: Gaming Market Advisors, 2008.

Given the substantial levels of annual gaming wins at facilities within the competitive gaming market and the increased overall competitive gaming revenue that would result from the implementation of Alternative A, declines in revenue at gaming facilities would be minimal. It is likely that gaming facilities in the competitive gaming market would continue to generate positive

cash flows for their owners and operators, and operation would not be substantially affected. This is considered a *less-than-significant* impact.

4.7.9 Alternative A would improve the economic status of the Tribe from revenue generated at the gaming facility, new employment opportunities, and increased wages. This would be a beneficial impact.

Alternative A would improve the economic status of the Tribe compared to existing levels, as described in **Section 3.7.2**. The largest portion of revenues generated at the gaming facility under Alternative A would be received by the Tribe. With increased revenues the Tribe could explore new economic opportunities and social programs to serve Tribe members. A portion of new employment opportunities generated by Alternative A would be filled by Tribal members. The Tribe has indicated through the MSA that they shall work in good faith to employ Native Americans and offer training programs to assist Native Americans. Based on current labor statistics for the Tribe (**Section 3.7.2**), Alternative A is expected to employ previously unemployed Tribal members and significantly increase wages earned by Tribal members currently employed at other locations. This would be a *beneficial* impact.

4.7.2 ALTERNATIVE B – MIXED-USE TRIBAL DESTINATION RESORT AND CASINO WITH RESIDENTIAL COMPONENT

Socioeconomic Impacts

4.7.10 Implementation of Alternative B would generate substantial economic activity into the regional economy from expenditures on goods and services associated with construction and operation of the project. This would be a beneficial impact.

Alternative B proposes development consisting of features proposed in Alternative A along with a residential component. Expenditures on goods and services for construction and operational activities would generate substantial direct economic output, as well as indirect and induced economic output.

Construction

Under Alternative B, construction activities are estimated to cost approximately \$1.514 billion, which is expected to generate a one-time total output of approximately \$3.862 billion within the County (excluding land and financing-related costs) (**Table 4.7-1**). Direct output was estimated to total approximately \$1.684 billion, of which approximately \$1.317 billion (78 percent) would be attributed to the construction industry. Indirect and induced outputs were estimated to total \$1.128 and \$1.050 billion, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Operation

Under Alternative B, gross revenue for 2012 was estimated to be \$964 million, which is expected to generate an annual total output of approximately \$1.625 billion within the County (**Table 4.7-2**). Direct output was estimated to total approximately \$804 million, of which approximately \$709 million (88 percent) would be attributed to the gaming and entertainment industry. Indirect and induced outputs were estimated to total \$339 and \$482 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Under Alternative B a portion of revenue would be transferred from other local businesses. Similar to Alternative A, this amount represents a negligible portion of total economic activity due to the large scale of development proposed under Alternative B.

This impact would be comparable, but to a slightly greater extent than Alternative A, and would be a *beneficial impact*.

4.7.11 Implementation of Alternative B would generate substantial employment opportunities and wages in the regional economy from construction and operational activities. This would be a beneficial impact.

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages.

Construction

Under Alternative B, investment in construction activities would generate a one-time total of approximately 22,295 employment opportunities within the County (**Table 4.7-3**). Direct output was estimated to total approximately 11,187 employment opportunities, of which approximately 8,578 (77 percent) would be attributed to the construction industry. Indirect and induced employment opportunities were estimated to total 4,447 and 6,660, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Under Alternative B, investment in construction activities would generate one-time total wages of approximately \$1.070 billion within the County (**Table 4.7-3**). Direct wages were estimated to total approximately \$550 million, of which approximately \$430 million (78 percent) would be attributed to the construction industry. Indirect and induced wages were estimated to total \$228 and \$292 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Operation

Under Alternative B, investment in operational activities would generate an annual total of approximately 17,682 employment opportunities within the County (**Table 4.7-3**). Direct output was estimated to total approximately 12,673 employment opportunities, of which approximately 11,407 (90 percent) would be attributed to the gaming and entertainment industry. Indirect and induced employment opportunities were estimated to total 2,143 and 2,866, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Under Alternative B, investment in operational activities would generate annual total wages of approximately \$504 million within the County (**Table 4.7-5**). Direct wages were estimated to total approximately \$283 million, of which approximately \$248 million (88 percent) would be attributed to the gaming and entertainment industry. Indirect and induced wages were estimated to total \$87 and \$135 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Alternative B would draw employees from both within and outside of the County, similar to Alternative A. Alternative B would result in the demand for skilled labor of 1,201 persons and other out-of-market labor of 12,377 persons. Considering both skilled and non-skilled out-of-market labor, Alternative B would result in the demand for in-market labor of 4,104. The impact of Alternative B on the 2012 County labor market was demonstrated by evaluating the amount of in-market labor demanded to the amount of available labor or those unemployed. The unemployment rate of the County labor market with the incorporation of Alternative B would be 3.5 percent, compared to 4.3 percent without the development of a project (**Table 4.7-6**). Additionally, with the development of Alternative B the 2012 County labor force would be 776 persons larger than without the project. Growth of the 2012 labor force is attributed to persons moving into the County to fill new employment opportunities. This is a dynamic that is dependent on several conditions, is difficult to quantify, and was not considered in this analysis; therefore, this analysis provides a conservative estimate, similar to that discussed under Alternative A.

To help ensure the employment of City residents, Tribal members, and other Native Americans, the Tribe has indicated through the MSA that it will work in good faith to employ qualified City residents, Tribal members, and other Native Americans, and offer training programs to assist City residents, Tribal members, and other Native Americans (**Appendix C**). This impact would be comparable, but to a slightly greater extent than Alternative A, and would be a *beneficial impact*.

4.7.12 Alternative B would develop new housing, and operation of Alternative B would generate an increase in demand for existing vacant housing from employees relocating to the County. This would be a beneficial impact.

Alternative B would include the construction of 340 new homes. A portion of the homes is planned to be used as housing for Guidiville Tribal members, under a Tribal housing program developed by the Tribe. Construction of the housing element would not displace existing occupied housing within the City or County.

Increased demand for housing under Alternative B would also result from the relocation of employees from outside the County to fulfill employment opportunities generated from operation similar to Alternative A. Under Alternative B, a total of 776 employees are anticipated to require dwellings, of which, a total of 176 employees are anticipated to relocate to within the County in order to fill demand for in-market labor. A total of 600 employees are anticipated to relocate from the out-of-market labor force to fill the newly created skilled employment opportunities from Alternative B (**Appendix T**).

The 2012 County housing market is projected to have a total of 421,152 units, of which 4.7 percent (19,934 units) would be vacant (**Appendix T; Table 4.7-7**). The impact of Alternative B on the 2012 County housing market was demonstrated by evaluating the availability of 19,934 dwellings to the demand for 776 dwellings. The comparison of these values indicates that the available housing could easily fulfill demand and Alternative A would not require any new housing to be built. This impact would result in a slight (0.1 percent) decrease in the vacancy rate of the 2012 County housing market, which would not be a large enough change to affect housing prices (**Table 4.7-7**). Additionally, the total number of housing units in the 2012 County housing market would increase by 340 units, which is reflective of the new housing proposed under Alternative B.

This impact would be comparable, but to a slightly greater extent than Alternative A, and would be a *beneficial impact*. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**.

4.7.13 Implementation of Alternative B would result in a variety of fiscal impacts, which collectively would result in substantial revenues for federal, state, and county governments. This would be a beneficial impact.

Currently the property is public land primarily owned by the City, and no tax revenues are generated. Tribes do not pay corporate income taxes on revenue or property taxes on tribal land, since trust land is not subject to local jurisdiction and tribes are sovereign nations. Under

Alternative B, annual taxes (approximately \$320,000) on the \$30,008,671 value of the property parcels would not be paid by the Tribe. Under Alternative B, the Tribe would make payments to the City per the MSA for public services, community benefits, and utilities, as discussed in Alternative A.

For Alternative B, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, County, and local governments. Construction would result in an estimated \$159 million in federal tax revenues, \$168 million in state/County/local government tax revenues, and \$118 million in County/local government tax revenues. Operation of Alternative B would result in an estimated \$75 million in federal tax revenues, \$103 million in state/County/local government tax revenues, and \$90 million in County/local government tax revenues (Tables 4.7-8 and 4.7-9).

As outlined in the MSA and discussed in Alternative A, the State would also receive substantial revenue from gaming taxes. Under Alternative B, gross revenue was projected to total \$813 million, which would result in gaming taxes paid to the State of \$163 million (Table 4.7-9). This impact would be comparable, but to a slightly greater extent than Alternative A, and would be a *beneficial impact*.

4.7.14 Alternative B would provide another opportunity for gambling to pathological and problem gamblers, which is expected to increase the rate of pathological and problem gamblers within ten miles of the project site. This would be a potentially significant impact.

Significance After Mitigation

The implementation of **Mitigation Measure 6-1** would reduce any pathological and problem gambling impacts to *less-than-significant* levels.

Impact Discussion

Impacts to pathological and problem gambling from Alternative B would be the same as discussed in Alternative A. This would be a *potentially significant* impact.

4.7.15 Alternative B would introduce a large number of new people into the community, which would be expected to result in an increase in criminal incidents. This would be a less-than-significant impact.

Impacts to crime from Alternative B would be comparable, but to a slightly larger extent than Alternative A. Alternative B would be a large-scale development that would introduce a large number of patrons and employees into the project site and community on a daily basis. As a result, the criminal incidents would be expected to increase as with any other development of this

size, yet be countervailed by the introduction of a large number of living-wage jobs in the community. The implementation of the MSA would ensure contributions by the Tribe to the City for public services, which would, in part, fund expansion of law enforcement services required to accommodate planned growth. This would be a *less-than-significant* impact.

Environmental Justice Impacts

4.7.16 Alternative B would not result in disproportionately adverse impacts to any minority or low-income communities. This would be a less-than-significant impact.

Minority and low-income communities within proximity of the project site were identified in **Section 3.7.3**, and discussed briefly under Alternative A. Increased traffic volumes under Alternative B would impact the existing level of service at intersections in Census Tracts 3780, 3650.01, and 3650.02. However, with the implementation of **Mitigation Measures 7-4** through **7-8**, impacts would be mitigated to a *less-than-significant* level. Similar to Alternative A, Alternative B would not result in any disproportionately adverse impacts to minority and low-income communities. This would be a *less-than-significant* impact.

4.7.17 Alternative B would result in a variety of impacts to the competitive gaming market. The overall amount of revenue available in the competitive gaming market would increase, and a portion of revenue for Alternative B would be diverted from existing tribal casinos. No existing casino is anticipated to experience a substantial decline in revenue. This would be a less-than-significant impact.

The project site would be located in the Northern California gaming market as described in **Section 3.7.3**. For the year 2012, the overall competitive gaming market revenue without a project was estimated to be \$1.83 billion. Implementation of Alternative B would result in, an estimated 2012 overall competitive gaming market revenue of \$2.20 billion, which is an increase of 20 percent. From the 2012 competitive gaming market, Alternative B was estimated to divert approximately \$174 million from the Greater San Francisco market, approximately \$218 million from the Greater Sacramento market, and approximately \$25 million from the market of other Northern California casinos (**Table 4.7-11**).

Given the substantial levels of annual gaming wins at facilities within the competitive gaming market and the increased overall competitive gaming revenue that would result from the implementation of Alternative B, declines in revenue at gaming facilities would be minimal. It is likely that gaming facilities in the competitive gaming market would continue to generate positive cash flows for their owners and operators, and operations would not be substantially affected. This is considered a *less-than-significant* impact.

4.7.18 Alternative B would improve the economic status of the Tribe from revenue generated at the gaming facility, new employment opportunities, increased wages, and new housing opportunities. This would be a beneficial impact.

Alternative B would improve the economic status of the Tribe compared to existing levels, similar to Alternative A. Alternative B would also include the development of new housing opportunities for Tribal members. This impact would be comparable, but to a slightly greater extent than Alternative A, and would be a *beneficial* impact.

4.7.3 ALTERNATIVE C – REDUCED INTENSITY MIXED-USE TRIBAL DESTINATION RESORT AND CASINO

Socioeconomic Impacts

4.7.19 Implementation of Alternative C would generate substantial economic output into the regional economy from expenditures on goods and services associated with construction and operation of the project. This would be a beneficial impact.

Alternative C proposes development of a casino resort project that is reduced in intensity, when compared to Alternative A. Expenditures on goods and services for construction and operational activities would generate substantial direct economic output, as well as indirect and induced economic output.

Construction

Under Alternative C, construction activities are estimated to cost approximately \$686 million, which is expected to generate a one-time total output of approximately \$2.008 billion within the County (excluding land and financing-related costs) (**Table 4.7-1**). Direct output was estimated to total approximately \$869 million, of which approximately \$658 million (76 percent) would be attributed to the construction industry. Indirect and induced output, were estimated to total \$608 and \$531 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Operation

Under Alternative C, gross revenue for 2012 was estimated to be \$737 million, which is expected to generate an annual total output of approximately \$1.183 billion within the County (**Table 4.7-2**). Direct output was estimated to total approximately \$583 million, of which approximately \$558 million (96 percent) would be attributed to the gaming and entertainment industry. Indirect and induced output was estimated to total \$247 and \$354 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Under Alternative C a portion of revenue would be transferred from other local businesses. Similar to Alternative A, this amount represents a negligible portion of total economic activity due to the large scale of development proposed under Alternative C.

This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial impact*.

4.7.20 Implementation of Alternative C would generate substantial employment opportunities and wages in the regional economy from investment in construction and operational activities. This would be a beneficial impact.

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages.

Construction

Under Alternative C, investment in construction activities would generate a one-time total of approximately 11,276 employment opportunities within the County (**Table 4.7-3**). Direct output was estimated to total approximately 5,563 employment opportunities, of which approximately 4,288 (77 percent) would be attributed to the construction industry. Indirect and induced employment opportunities were estimated to total 2,345 and 3,367, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Investment in construction activities under Alternative C would generate one-time total wages of approximately \$541 million within the County (**Table 4.7-3**). Direct wages were estimated to total approximately \$272 million, of which approximately \$215 million (79 percent) would be attributed to the construction industry. Indirect and induced wages were estimated to total \$122 and \$147 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Operation

Under Alternative C, investment in operational activities would generate an annual total of approximately 13,045 employment opportunities within the County (**Table 4.7-3**). Direct output was estimated to total approximately 9,340 employment opportunities, of which approximately 8,973 (96 percent) would be attributed to the gaming and entertainment industry. Indirect and induced employment opportunities were estimated to total 1,604 and 2,101, respectively. Indirect

and inducted employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County

Under Alternative C, investment in operational activities would generate annual total wages of approximately \$367 million within the County (**Table 4.7-3**). Direct wages were estimated to total approximately \$204 million, of which approximately \$195 million (96 percent) would be attributed to the gaming and entertainment industry. Indirect and induced wages were estimated to total \$64 and \$99 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Alternative C would draw employees from both within and outside of the County, similar to Alternative A. Alternative C would result in the demand for skilled labor of 886 and other out-of-market labor of 9,131. Considering both skilled labor and non-skilled out-of-market labor, Alternative C would result in the demand for in-market labor of 3,028. The impact of Alternative C on the 2012 County labor market was demonstrated by evaluating the amount of in-market labor demanded to the amount of available labor or those unemployed. The unemployment rate of the County labor market with the incorporation of Alternative C would be 3.7 percent, compared to 4.3 percent without the development of a project (**Table 4.7-6**). Additionally, with the development of Alternative C the 2012 County labor force would be 443 persons larger than without the project. Growth of the 2012 labor force is attributed to persons moving into the County to fill new employment opportunities. This is a dynamic that is dependent on several conditions, is difficult to quantify, and was not considered in this analysis; therefore, this analysis provides a conservative estimate, similar to that discussed under Alternative A.

To help ensure the employment of City residents, Tribal members, and other Native Americans, the Tribe has indicated through the MSA that it will work in good faith to employ qualified City residents, Tribal members, and other Native Americans, and offer training programs to assist City residents, Tribal members, and other Native Americans (**Appendix C**). This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial impact*.

4.7.21 Operation of Alternative C would generate an increase in demand for existing vacant housing from employees relocating to the County. This would be a beneficial impact.

Increased demand for housing would result from the relocation of employees from outside the County to fulfill employment opportunities for skilled labor generated from operation of Alternative C. Under Alternative C, a total of 443 employees are anticipated to require dwellings (**Appendix T**).

The 2012 County housing market is projected to have a total of 421,152 units, of which 4.7 percent (19,934 units) would be vacant (**Appendix T; Table 4.7-7**). The impact of Alternative C on the 2012 County housing market was demonstrated by evaluating the availability of 19,934 dwellings to the demand for 443 dwellings. The comparison of these values indicates that the available housing could easily fulfill demand and Alternative A would not require any new housing to be built. This impact would result in a slight (0.1 percent) decrease in the vacancy rate of the 2012 County housing market (**Table 4.7-7**), which would not be a large enough change to affect housing prices.

This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial impact*. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**.

4.7.22 Implementation of Alternative C would result in a variety of fiscal impacts, which collectively would result in substantial revenues for the federal, state, and County governments. This would be a beneficial impact.

Currently the property is public land primarily owned by the City, and no tax revenues are generated. Tribes do not pay corporate income taxes on revenue or property taxes on tribal land, since trust land is not subject to local jurisdiction and tribes are sovereign nations. Under Alternative C, annual taxes (approximately \$320,000) on the \$30,008,671 value of the property parcels would not be paid by the Tribe. Under Alternative C, the Tribe would make payments to the City per the MSA for public services, community benefits, utilities, and gaming taxes, as discussed in Alternative A.

For Alternative C, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, County, and local governments. Construction would result in an estimated \$80 million in federal tax revenues, \$84 million in state/County/local government tax revenues, and \$59 million in County/local government tax revenues. Operation of Alternative C would result in an estimated \$55 million in federal tax revenues, \$74 million in state/County/local government tax revenues, and \$67 million in County/local tax revenues (**Tables 4.7-8 and 4.7-9**).

As outlined in the MSA and discussed in Alternative A, the State would also receive substantial revenue from gaming taxes. Under Alternative C, gross revenue was projected to total \$691 million, which would result in gaming taxes paid to the State of \$138 million (**Table 4.7-9**). This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial impact*.

- 4.7.23 Alternative C would provide another opportunity for gambling to pathological and problem gamblers, which is expected to increase the rate of pathological and problem gamblers within ten miles of the project site. This would be a potentially significant impact.**

Significance After Mitigation

The implementation of **Mitigation Measure 6-1** would reduce any pathological and problem gambling impacts to *less-than-significant* levels.

Impact Discussion

Impacts to pathological and problem gambling from Alternative C would be the same as discussed in Alternative A. This is considered to be a *potentially significant* impact.

- 4.7.24 Alternative C would introduce a large number of new people into the community, which would be expected to result in an increase in criminal incidents. This would be a less-than-significant impact.**

Impacts to crime from Alternative C would be comparable, but to a slightly lesser extent than Alternative A. Alternative C would be a large-scale development that would introduce a large number of patrons and employees into the project site and community on a daily basis. As a result, the criminal incidents would be expected to increase as with any other development of this size, yet be countervailed by the introduction of a large number of living-wage jobs in the community. The implementation of the MSA would ensure contributions by the Tribe to the City for public services, which would, in part, fund expansion of law enforcement services required to accommodate planned growth. This would be a *less-than-significant* impact.

Environmental Justice Impacts

- 4.7.25 Alternative C would not result in disproportionately adverse impacts to any minority or low-income communities. This would be a less-than-significant impact.**

Minority and low-income communities within proximity of the project site were identified in **Section 3.7.3**, and discussed briefly under Alternative A. Increased traffic volumes under Alternative C would impact the existing level of service at intersections in Census Tracts 3780, 3650.01, and 3650.02. However, with the implementation of **Mitigation Measures 7-4 through 7-8**, impacts would be mitigated to a *less-than-significant* level. Similar to Alternative A, Alternative C would not result in any disproportionately adverse impacts to minority and low-income communities. This would be a *less-than-significant* impact.

- 4.7.26 Alternative C would result in a variety of impacts to the competitive gaming market. The overall amount of revenue available in the competitive gaming market would increase, and**

a portion of revenue for Alternative C would be diverted from existing tribal casinos. No existing casino is anticipated to experience a substantial decline in revenue. This would be a less-than-significant impact.

The project site would be located in the Northern California gaming market as described in **Section 3.7.3**. For the year 2012, the overall competitive gaming market revenue without a project was estimated to be \$1.83 billion. Implementation of Alternative C would result in, an estimated 2012 overall competitive gaming market revenue of \$2.18 billion, which is an increase of 19 percent. From the 2012 competitive gaming market, Alternative C was estimated to divert approximately \$139 million from the Greater San Francisco market, approximately \$162 million from the Greater Sacramento market, and approximately \$13 million from the market of other Northern California casinos (**Table 4.7-11**).

Given the substantial levels of annual gaming win at facilities within the competitive gaming market and the increased overall competitive gaming revenue that would result from the implementation of Alternative C, declines in revenue at gaming facilities would be minimal. It is likely that gaming facilities in the competitive gaming market would continue to generate positive cash flows for their owners and operators, and operation would not be substantially affected. This is considered a *less-than-significant* impact.

4.7.27 Alternative C would improve the economic status of the Tribe from revenue generated at the gaming facility, new employment opportunities, and increased wages. This would be a beneficial impact.

Alternative C would improve the economic status of the Tribe compared to existing levels, similar to Alternative A. This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial* impact.

4.7.4 ALTERNATIVE D – NON-TRUST ACQUISITION WITH NON-GAMING MIXED-USE DEVELOPMENT

Socioeconomic Impacts

4.7.28 Implementation of Alternative D would generate substantial economic output into the regional economy from expenditures on goods and services associated with construction and operation of the project. This would be a beneficial impact.

Alternative D proposes development consisting of dining, retail, hotel, and conference facilities, as well as parkland and a residential component. Expenditures on goods and services for construction and operation activities would generate substantial direct economic output, as well as indirect and induced economic output.

Construction

Under Alternative D, construction activities are estimated to cost approximately \$1.003 billion, which is expected to generate a one-time total output of approximately \$2.652 billion within the County (excluding land and financing-related costs) (**Table 4.7-1**). Direct output was estimated to total approximately \$1.132 billion, of which approximately \$1.090 billion (96 percent) would be attributed to the construction industry. Indirect and induced outputs were estimated to total \$785 and \$734 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Operation

Under Alternative D, gross revenue for 2012 was estimated to be \$32 million, which is expected to generate an annual total output of approximately \$64 million within the County (**Table 4.7-2**). Direct output was estimated to total approximately \$32 million, of which approximately \$21 million (66 percent) would be attributed to the accommodation and food services industry. Indirect and induced outputs were estimated to total \$16 and \$17 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Under Alternative D a portion of revenue would be transferred from other local businesses. Similar to Alternative A, this amount represents a negligible portion of total economic activity due to the large scale of development proposed under Alternative D.

This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial impact*.

4.7.29 Implementation of Alternative D would generate substantial employment opportunities and wages in the regional economy from investment in construction and operation activities. This would be a beneficial impact.

Investment in construction and operational activities would generate substantial direct employment opportunities and wages, as well as indirect and induced employment opportunities and wages.

Construction

Under Alternative D, investment in construction activities would generate a one-time total of approximately 15,251 employment opportunities within the County (**Table 4.7-3**). Direct output was estimated to total approximately 7,527 employment opportunities, of which approximately 7,101 (94 percent) would be attributed to the construction industry. Indirect and induced

employment opportunities were estimated to total 3,065 and 4,659, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Under Alternative D, investment in construction activities would generate one-time total wages of approximately \$735 million within the County (**Table 4.7-3**). Direct wages was estimated to total approximately \$373 million, of which approximately \$356 million (95 percent) would be attributed to the construction industry. Indirect and induced wages were estimated to total \$158 and \$204 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Operation

Under Alternative D, investment in operational activities would generate an annual total of approximately 605 employment opportunities within the County (**Table 4.7-3**). Direct output was estimated to total approximately 445 employment opportunities, of which approximately 326 (73 percent) would be attributed to the accommodation and food services industry. Indirect and induced employment opportunities were estimated to total 61 and 99, respectively. Indirect and induced employment opportunities would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Under Alternative D, investment in operational activities would generate annual total wages of approximately \$19 million within the County (**Table 4.7-3**). Direct wages were estimated to total approximately \$11 million, of which approximately \$7 million (64 percent) would be attributed to the accommodation and food services industry. Indirect and induced wages were estimated to total \$3 and \$5 million, respectively. Indirect and induced output would be dispersed and distributed among a variety of different industries and businesses throughout the County.

Alternative D would draw employees from both within and outside of the County, similar to Alternative A. Alternative D would result in the demand for skilled labor of 41 and other out-of-market labor of 424 persons. Considering both skilled labor and out-of-market labor, Alternative D would result in the demand for in-market labor of 140 persons. The impact of Alternative D on the 2012 County labor market was demonstrated by evaluating the amount of in-market labor demanded to the amount of available labor or those unemployed. The unemployment rate of the County labor market with the incorporation of Alternative D would be the same as without the development of a project (**Table 4.7-6**). Additionally, with the development of Alternative A the 2012 County labor force would be 20 persons larger than without the project. Growth of the 2012 labor force is attributed to persons moving into the County to fill new employment opportunities. This is a dynamic that is dependent on several conditions, is difficult to quantify, and is not

considered in this analysis; therefore, this analysis provides a conservative estimate, similar to Alternative A.

The MSA would not be implemented under Alternative D. This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial impact*.

4.7.30 Alternative D would develop new housing, and operation of Alternative D would generate an increase in demand for existing vacant housing from employees relocating to the County. This would be a beneficial impact.

Alternative D would include the construction of 1,100 new homes. Roughly two-thirds of the residential units would be medium or high density, with the balance proposed for low-density units. Construction of the housing component would not displace existing occupied housing within the City or County.

A minor increased demand for housing would result from the relocation of employees from outside the County to fulfill employment opportunities for skilled labor generated from operation of Alternative D. Under Alternative D, a total of 21 employees are anticipated to require housing units (**Appendix T**).

The 2012 County housing market is projected to have a total of 421,152 units, of which 4.7 percent (19,934 units) would be vacant (**Appendix T; Table 4.7-7**). The impact of Alternative D on the 2012 County housing market was demonstrated by evaluating the availability of 19,934 dwellings to the demand for 21 dwellings. The comparison of these values indicates that the available housing could easily fulfill demand and Alternative D would not require any new housing to be built. The vacancy rate of the 2012 County housing market would be the same as without the project (**Table 4.7-7**), which would not affect housing prices. Additionally, the total number of housing units in the 2012 County housing market would increase by 1,100 units, which is reflective of the new housing proposed under Alternative D.

This impact would be comparable, but to a lesser extent than Alternative A, and would be a *beneficial impact*. Indirect impacts resulting from growth inducement are discussed further in **Section 4.14**.

4.7.31 Implementation of Alternative D would result in a variety of fiscal impacts, which collectively would result in substantial revenues for the federal, state, and County governments. This would be a beneficial impact.

Currently the property is public land primarily owned by the City, and no tax revenues are generated. Under Alternative D, the project site would not be placed into trust for the Tribe. The value of the property parcels would not be lost as a source of revenue to the County; however, the City would be required to assume resources and expenses for maintenance and upkeep of the property, which is currently paid by the City and the Navy. Normal property and municipal taxes would be paid by the City under Alternative D, similar to other developments in the City.

For Alternative D, construction activities would generate one-time tax revenues, while operational activities would generate annual revenues to the federal, state, and County governments. Construction would result in an estimated \$108 million in federal tax revenues, \$105 million in state/County/local government tax revenues, and \$67 million in County/local government tax revenues. Operation of Alternative D would result in an estimated \$3 million in federal tax revenues, \$4 million in state/County/local government tax revenues, and \$4 million in County/local government tax revenues (**Tables 4.7-8 and 4.7-9**). Under Alternative D, the State would not receive gaming taxes, since this alternative does not include a casino component.

The MSA would not be implemented under Alternative D. This impact would be to a substantially lesser extent than Alternative A, and would be a *beneficial impact*.

4.7.32 Alternative D would not affect the rate of pathological and problem gamblers in the population. No impact would occur.

No pathological or problem gambling impacts would result from Alternative D, since a casino component is not included under this alternative. *No impact* would occur.

4.7.33 Alternative D would introduce new people into the community, which would be expected to result in an increase in criminal incidents. However, the increase is not expected to be substantial. This would be a less-than-significant impact.

Impacts to crime from Alternative D would be comparable, but to a considerably lesser extent than Alternative A, since Alternative D does not include a casino component. It is not expected that enough new people would be introduced into the community to result in a substantial increase in criminal incidents. The MSA would not be implemented under Alternative D. This would be a *less-than-significant impact*.

Environmental Justice Impacts

4.7.34 Alternative D would not result in disproportionately adverse impacts to any minority or low-income communities. This would be a less-than-significant impact.

Minority and low-income communities within proximity of the project site were identified in **Section 3.7.3** and discussed briefly under Alternative A. Increased traffic volumes under Alternative D would impact the existing level of service at intersections in Census Tracts 3780, 3650.01, and 3650.02. However, with the implementation of **Mitigation Measures 7-4 through 7-8**, impacts would be mitigated to a *less-than-significant* level. Similar to Alternative A, Alternative D would not result in any disproportionately adverse impacts to minority and low-income communities. This would be a *less-than-significant* impact.

4.7.35 Alternative D would not result in impacts to Native American Tribes. No impact would occur.

Tribes operating gaming facilities within the competitive gaming market would not be affected by Alternative D, since this alternative does not include a casino component and *no impact* would occur.

4.7.36 Alternative D would improve the economic status of the Tribe from revenue generated by development of the project and new housing opportunities. This would be a beneficial impact.

Alternative D would improve the economic status of the Tribe compared to existing levels, but to a much lesser extent than Alternative A. Alternative D would also include the development of new housing opportunities for Tribal members. This impact would be comparable, but to a considerably lesser extent than Alternative A, and would be a *beneficial* impact.

4.7.5 ALTERNATIVE E – TOTAL PARKLAND

Socioeconomic Impacts

4.7.37 Operation of Alternative E would generate minimal new economic output to businesses in the County. This would be a beneficial impact.

Under Alternative E, no new construction activities would occur. Operation of Alternative E as a shoreline park alternative would attract new visitors to the City. New visitors to the City would result in some new spending at businesses in the County; however, due to the recreational nature of Alternative E, new economic activity is expected to be minimal. This impact would be substantially less than Alternative A. Any new output to area businesses would be considered a *beneficial* impact, although new revenues are expected to be minimal.

4.7.38 Operation of Alternative E would generate minimal new employment opportunities at the project site. This would be a beneficial impact.

Under Alternative E, a very minimal number of construction workers would be required for construction of the bay trail and stabilization of the structures. Operation of Alternative E as a shoreline park alternative would generate new employment opportunities for staffing and maintenance of the park. Spending at businesses in the County from new visitors as a result of Alternative E is not expected to generate new employment opportunities, since output to County businesses would be minimal. This impact would be substantially less than Alternative A. Any new employment opportunities would be considered a *beneficial* impact.

4.7.39 Implementation of Alternative E would not create new housing or demand for existing vacant housing. No impact would occur.

Implementation of Alternative E would not include the construction of new housing. New employment opportunities generated at the project site could be filled by persons already living in the County. *No impact* would occur.

4.7.40 Implementation of Alternative E would result in minimal new tax revenues from new spending at local business; however, this would be offset by costs incurred by the City to maintain the project site. This would be a less-than-significant impact.

Implementation of Alternative E would not result in the loss of property tax revenues to the County. However, for a shoreline park development the City would be required to incur significant capital investments and operational and maintenance expenses. Potential investments and expenses include land acquisition, upkeep of historical buildings, site remediation funding, infrastructure improvements, Bay Trail funding, upkeep of the parkland, and ecological restoration including native revegetation and a management plan.

Some new tax revenues could be generated by the minimal new output received by County businesses; however, this effect would likely not be sufficient to overcome the investments, operation, and maintenance expenses discussed above. This impact would be substantially less than Alternative A, and is considered a *less-than-significant* impact as the City's existing revenues would be used to fund site activities.

4.7.41 Alternative E would not affect the rate of pathological and problem gamblers in the population. No impact would occur.

No pathological or problem gambling impacts would result from Alternative E since a casino component is not included. *No impact* would occur.

4.7.42 Alternative E would not alter the existing rate of crime in the area. No impact would occur.

No impacts to crime would result from Alternative E, since no new people would be introduced to the area. *No impact* would occur.

Environmental Justice Impacts

4.7.43 Alternative E would not result in disproportionately adverse impacts to any minority or low-income communities. This would be a less-than-significant impact.

Minority and low-income communities within proximity of the project site were identified in **Section 3.7.3**. Alternative E would not result in any disproportionately adverse impacts to minority and low-income communities. Under Alternative E, these areas would not receive the benefit of new employment opportunities to the large magnitude that would be received under Alternative A. This would be a *less-than-significant* impact.

4.7.44 Alternative E would not result in impacts to Native American Tribes. No impact would occur.

Tribes operating gaming facilities within the competitive gaming market would not be affected by Alternative E, since this alternative does not include a casino component. *No impact* would occur.

4.7.6 ALTERNATIVE F – NO ACTION

Socioeconomic Impacts

4.7.45 Implementation of Alternative F would not generate any new economic output to businesses in the County. No impact would occur.

Implementation of Alternative F would not include construction or operational activities, and no expenditures on goods and services would occur. Therefore, no economic output would be received by City or County businesses and further stimulation of economic activity in the county would not occur. *No impact* would occur.

4.7.46 Implementation of Alternative F would not generate new employment opportunities or wages at businesses in the County. No impact would occur.

Implementation of Alternative F would not include construction or operational activities, and no expenditures on goods and services would occur. Therefore, no new employment opportunities or wages would be generated at City or County businesses. *No impact* would occur.

4.7.47 Implementation of Alternative F would not create new housing or demand for existing vacant housing. No impact would occur.

Implementation of Alternative F would not include the construction of new housing. Since no new employment opportunities would be generated under Alternative F, no new demand for available vacant units would occur. *No impact* would occur.

4.7.48 Implementation of Alternative F would not result in fiscal impacts, except the City would be required to expend existing resources to assume management and maintenance of the property. This would be a less-than-significant impact.

Implementation of Alternative F would not result in the loss of property tax revenues to the County. The Tribe would not make any payments to the City. Since no new expenditures on goods and services would occur, federal, state, and local governments would not receive any new tax revenues. This alternative would require the City to expend existing resources to maintain the project site. This is considered a *less-than-significant* impact.

4.7.49 Alternative F would not affect the rate of pathological and problem gamblers in the population. No impact would occur.

No pathological or problem gambling impacts would result from Alternative F since a casino component is not included. *No impact* would occur.

4.7.50 Alternative F would not alter the existing rate of crime in the area. No impact would occur.

No impacts to crime would result from Alternative F, since no new people would be introduced to the area. *No impact* would occur.

Environmental Justice Impacts

4.7.51 Alternative F would not result in disproportionately adverse impacts to any minority or low-income communities. This would be a less-than-significant impact.

Minority and low-income communities within proximity of the project site were identified in **Section 3.7.3**. Alternative F would not result in any disproportionately adverse impacts to minority and low-income communities. Under Alternative F, these areas would not receive the benefit of new employment opportunities. This would be a *less-than-significant* impact.

4.7.52 Alternative F would not result in impacts to Native American Tribes. No impact would occur.

Tribes operating gaming facilities within the competitive gaming market would not be affected by Alternative F, since this alternative does not include a casino component. *No impact* would occur.