

**PARKWEST CASINO 580 EXPANSION PROJECT**  
**RESPONSES TO PUBLIC COMMENTS ON THE INITIAL STUDY/MITIGATED**  
**NEGATIVE DECLARATION**

This Responses to Comments document contains comments received during the public review period for the Parkwest Casino 580 Expansion Project (proposed project) Initial Study/Mitigated Negative Declaration (IS/MND). The City of Livermore, as lead agency, released the IS/MND for public review beginning on November 15, 2024 and ending on December 4, 2024, pursuant to CEQA Guidelines Section 15105.

According to CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the IS/MND. However, unlike with an Environmental Impact Report (EIR), comments received on an IS/MND are not required to be attached to the negative declaration, nor must the lead agency make specific written responses to public agencies. Nonetheless, the lead agency has chosen to provide responses to those specific public comments that are related to the environmental analysis contained in the IS/MND.

**COMMENTS AND RESPONSES**

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The City of Livermore received one comment letter from the California Department of Transportation (Caltrans) during the open comment period on the IS/MND for the proposed project. The following section includes the letter received in addition to responses to each of the comments within the letter, insofar as the comments address environmental topics. The environmental-related comments within the letter are bracketed with assigned comment numbers. The bracketed comment letter is followed by numbered responses corresponding to each bracketed comment. Where revisions to the IS/MND text are required in response to a comment, new text is double underlined and deleted text is ~~struck through~~.

## Letter 1

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

**California Department of Transportation**

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
[www.dot.ca.gov](http://www.dot.ca.gov)



December 4, 2024

SCH #: 2024110526  
GTS #: 34620  
GTS ID: 04-ALA-2024-00874  
Co/Rt/Pm: ALA/580/15.25

Ashley Vera, Senior Planner  
City of Livermore  
1052 S. Livermore Avenue  
Livermore, CA 94550

**Re: Parkwest Casino 580 Expansion Project – Mitigated Negative Declaration (MND)**

Dear Ashley Vera:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Parkwest Casino 580 Expansion Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the November 2024 MND.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

**Project Understanding**

The proposed project would add a new surface parking lot with 230 parking spaces located east of the existing casino. The new parking lot would include 178 standard stalls, 26 electric vehicle (EV) capable spaces, 26 EV charging stations, and racks for up to 36 bicycles. Access to the parking lot would be provided by existing driveways on Doolan Road and North Canyons Parkway, as well as a new driveway from North Canyons Parkway, at the northeast corner of the project site. The proposed project would also include off-site improvements along North Canyons Parkway, including the development of a new Class IV bike lane with a landscaped buffer, restriping of traffic lanes, and shifting the existing bus turnout and bus shelter pad to the north. The proposed project is directly adjacent to Interstate (I)-580.

**Project Coordination**

This project is within the limits of a Caltrans project known internally as EA 0Q30U. The project will construct express lanes, rehabilitate the pavement, and upgrade highway-

"Provide a safe and reliable transportation network that serves all people and respects the environment."

**Letter 1  
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related features along southbound I-680 from 0.4 miles south of Calaveras Rd Undercrossing in Alameda County and 1.1 miles north of Alcosta Blvd Overcrossing in Contra Costa County. The project is under construction with major highway work to be completed in December 2025. This project has the following subprojects:

1.EA 2X490 is a Toll System Integration Installation project funded and administered by Alameda County Transportation Commission (Alameda CTC). This project will start the design phase in January 2025 and construction in Summer 2025.

2.EA 0Q303 is a Planting Mitigation project funded by Alameda CTC, with Caltrans managing the construction phase. This project will start the design phase in January 2025 and construction in Summer 2026.

Please provide any project plans and other technical documents when they are available for Caltrans review.

**1-1****Hydrology**

Please provide the flow rate at the outfall of the bio-treatment planters (Outfall Q) and clarify where the bio-treatment planters outfall to, as there are concerns that the outfall may tie to the State Drainage System.. If the bio-treatment planters are tied to a State drain, further mitigation measures may be needed. Please see the attachment at the end of this letter for known drainage facilities in the area.

**Construction-Related Impacts**

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

**Equitable Access**

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

**Encroachment Permit**

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right of Way (ROW) requires a Caltrans-issued encroachment permit.

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The Office of Encroachment Permit requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Flowchart, Figure 1.2 in Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval may take 30 days to 6 months or more depending on the project scope, size, complexity, completeness, compliance with policies and quality of the permit package submitted. Projects requiring exceptions to design standards or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)). When the applicant is ready to pursue a Caltrans encroachment permit, please contact [D4Permits@dot.ca.gov](mailto:D4Permits@dot.ca.gov) to initiate the process.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,



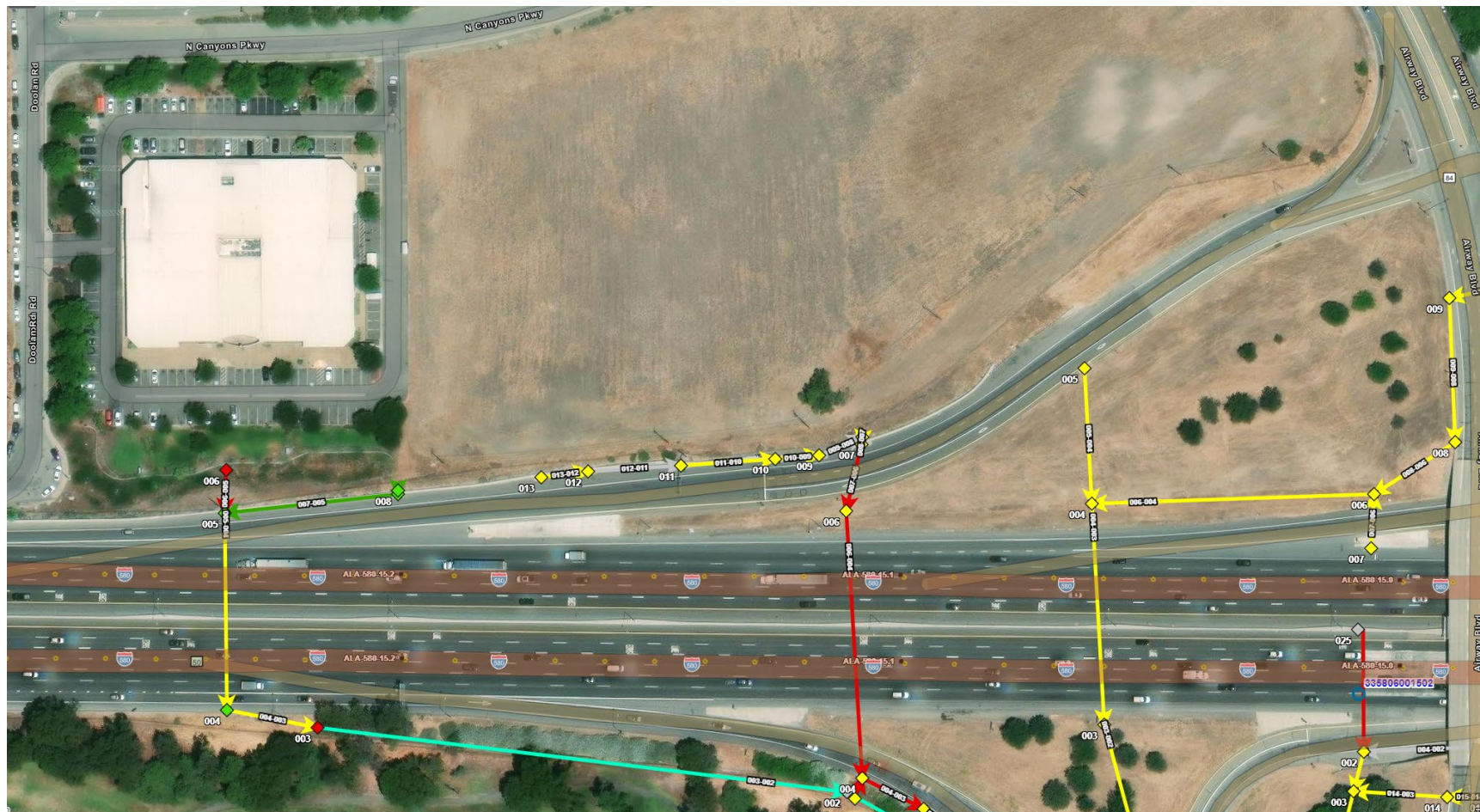
Marley Mathews  
Acting Branch Chief, Local Development Review  
Office of Regional and Community Planning

c: State Clearinghouse



# EXHIBIT C

## Letter 1 Cont'd



## LETTER 1: CALIFORNIA DEPARTMENT OF TRANSPORTATION, DECEMBER 4, 2024

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### Response to Comment 1-1

In response to the comment, the project applicant has modified project plans to avoid all California Department of Transportation (Caltrans) right-of-way, easements, and infrastructure. The layout of the proposed project has shifted slightly, but the number of parking stalls would remain unchanged. The proposed project's storm drain infrastructure would connect to the City's existing storm drain that travels through the project site. Therefore, Figure 3 and Figure 4 of the IS/MND have been replaced with those shown at the end of this document.

The last two paragraphs of page 8 of the IS/MND are hereby revised as follows:

A landscape area planted with hydroseed grass would be located north of the proposed parking lot expansion and smaller landscape islands would be located throughout the parking lot. ~~Three~~ One bioretention planters would be located along the ~~center and~~ southwest corner of the parking lot. Concrete pavement would be located along the eastern border of the large landscape area ~~and three concrete islands would be located within the parking lot.~~

The proposed project would include approximately ~~2.72~~ 2.404 gross acres of new impervious surfaces as part of development of the parking lot. The project site would ~~be divided into two~~ consist of one drainage management areas (DMAs).

The first paragraph of page 12 of the IS/MND is hereby revised as follows:

Stormwater runoff from the new impervious surfaces within the DMAs would be directed to the ~~three~~ on-site bioretention planters, ~~with two located within DMA 1 as part of Treatment Control Measure (TCM) 1, and one located within DMA 2 as part of TCM 2.~~ (see Figure 4).

Page 56 of the IS/MND is hereby revised as follows:

The City of Livermore has adopted the Alameda County C.3 Stormwater Standards, which require new development and redevelopment projects that create or alter 10,000 or more square feet (sf) of impervious area to contain and treat all stormwater runoff from the project site. A total of approximately ~~448,506~~ 104,734 sf of new impervious surfaces would exist on-site following implementation of the proposed project. Thus, the project would be subject to the requirements of the C.3 Stormwater Standards related to stormwater treatment, which are included in the City's NPDES General Permit.

Stormwater runoff within the project site would flow to ~~three~~ a bioretention planters located within the parking lot that would provide treatment and detention of the on-site stormwater runoff. In addition, the project would include various other landscaping elements that would allow for stormwater infiltration. The bio-treatment planters ~~consists~~ consist primarily of pervious landscaping, allowing for stormwater to infiltrate underlying soils. ~~The proposed project would also include an approximately 0.45-acre landscaped self treatment area located in the eastern portion of the project site.~~

~~Each of the~~ The bio-treatment planters would be sized to adequately handle all runoff from the proposed impervious surfaces and landscaping within the project site. Thus, the proposed project would comply with the requirements of the SWRCB and the Regional

Water Quality Control Board (RWQCB), and would meet C.3 Standards related to stormwater treatment. During operation, the project would comply with all relevant water quality standards and waste discharge requirements, and would not degrade water quality.

Page 58 of the IS/MND is hereby revised as follows:

Project development would result in an increase in on-site impervious surfaces, which would reduce the infiltration of groundwater as compared to existing conditions. However, approximately ~~2.02~~ 2.01 acres, or approximately 42 percent of the site, would remain as pervious surfaces, which would allow for the natural percolation of stormwater in those areas, which would continue to contribute to groundwater recharge similar to existing conditions. Furthermore, the proposed project would include the development of ~~three~~ an on-site bioretention planters, which would allow for the on-site infiltration of surface water to continue, and contribute to groundwater recharge. Therefore, the proposed project would not interfere substantially with groundwater recharge on-site or interfere with groundwater recharge in the area.

Based on the above, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the Livermore-Amador Valley Groundwater Basin. In addition, the project would not conflict with or obstruct implementation of a water quality control plan or the 2005 GMP. Thus, a ***less-than-significant*** impact would occur.

- c.i-iii. A total of approximately ~~448,506~~ 104,734 sf of new impervious surfaces would exist on-site following implementation of the proposed project. As discussed above, the proposed project would be subject to the County C.3 Standards related to stormwater.

Storm water runoff within the project site would flow to ~~three~~ a bioretention planters located in the proposed parking lot that would provide treatment and retention of the on-site stormwater runoff. As shown above in Figure 4, the total treatment area on-site would be equal to new impervious area plus 10 percent of the landscaped area, as required by the County C.3 Stormwater Standards. Thus, adequate storage would be provided on-site.

Figure 1  
Site Plan

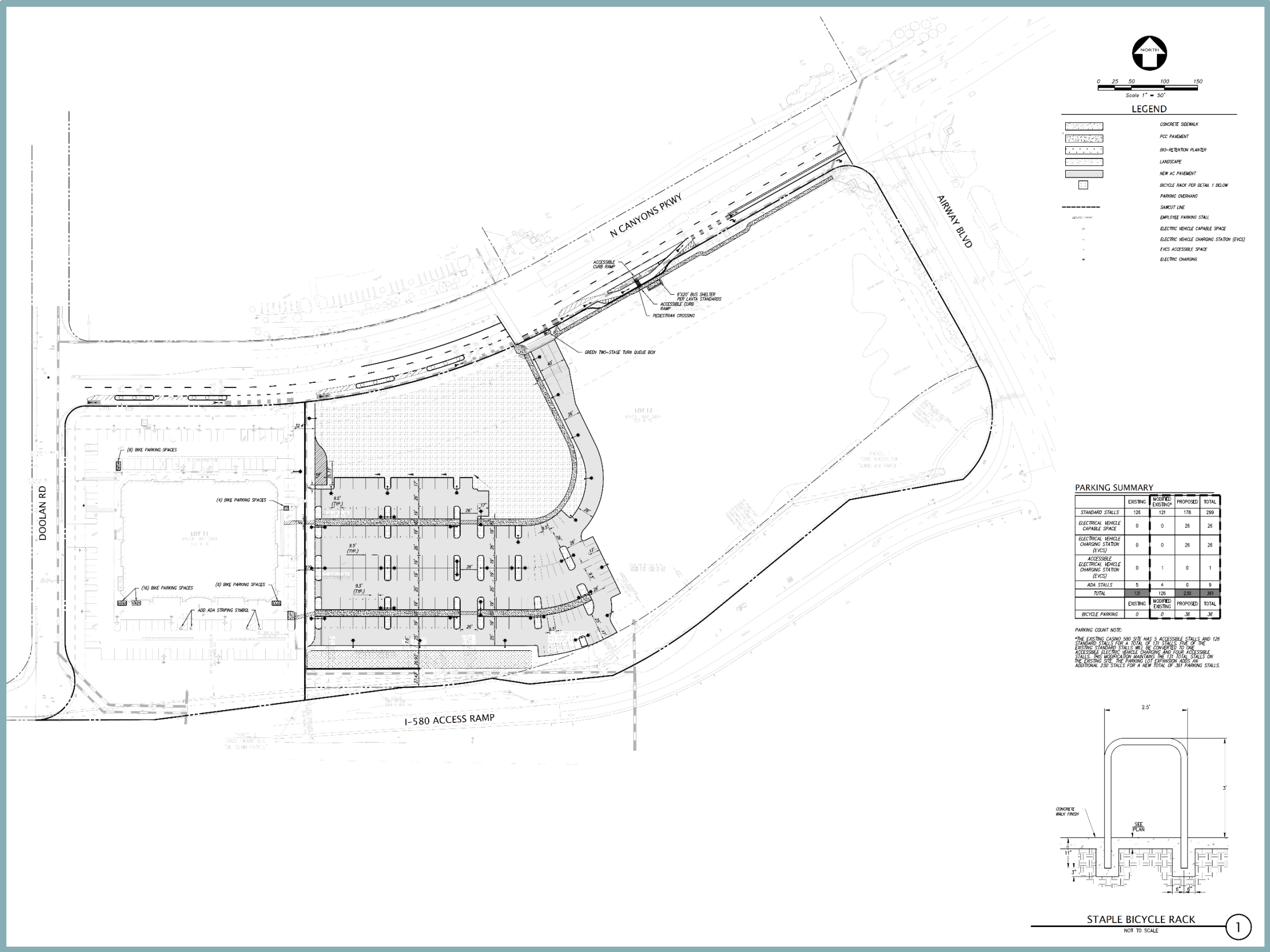




Figure 2  
Preliminary Stormwater Quality Control Plan

