

# CHAPTER 2.0

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## ALTERNATIVES

### 2.1 PREFERRED ALTERNATIVE

#### 2.1.1 FEE-TO-TRUST ACQUISITION

The Preferred Alternative consists of the conveyance of the 146-acre site from private ownership to federal trust status for the benefit of the Gun Lake Tribe. The transfer of the 146-acre site from fee to trust would be in accordance with BIA procedures by the Secretary of the Interior set forth in 25 CFR Section 151.3.

#### 2.1.2 GAMING AND ENTERTAINMENT FACILITY

The Tribe is proposing to develop a 193,500-square-foot gaming and entertainment facility on the 146-acre site north of the City of Kalamazoo along Highway 131 (**Figure 2-1**). It is anticipated that the facility will open in 2003. The facility would include a casino floor with gaming machines and table games, restaurants, a sports bar, and an entertainment lounge. Both Class II and Class III gaming would take place within the facility. As defined by the IGRA, Class II gaming includes bingo, pulltabs, and non-banking card games, while Class III gaming includes slot machines, table games, and banking card games such as baccarat or black jack. The facility is described in more detail in **Table 2-1**.

The facility would include two casual dining restaurants totaling approximately 10,902 square feet, and with a combined seating capacity of 350. A buffet style restaurant is proposed to be approximately 12,980 square feet, with a seating capacity of 800. Finally, the gaming and entertainment facility would include two fast food outlets, using an area of approximately 2,118 square feet and having a combined seating capacity of 100.

The gaming and entertainment facility would include both an entertainment lounge and a sports bar. These non-gaming entertainment components would use an area of approximately 10,012 square feet and would include seating areas with a combined capacity of 800. The entertainment lounge would contain a stage area for various live performances. The sports bar would contain an area with numerous video monitors for displaying sporting events.

As shown in **Figure 2-2**, the three entrances to the casino would be located along 129<sup>th</sup> Avenue between US-131 and the Norfolk Southern Railroad tracks. The project site would include approximately 3,500

on-site parking spaces. **Figure 2-3** displays a detailed plan for the 146-acre site. **Figure 2-4** shows an architectural rendition of the casino.

Lighting in parking areas would be directed at the ground. The parking lots will be constructed around the present forested area of the site in order to maximize on-site treed areas. Additionally, the landscaping will be designed to utilize the natural themes on-site.

### 2.1.3 WATER SUPPLY

Water supply options are described in detail in the *Gun Lake Gaming Facility Water and Wastewater Feasibility Study* (HSE, 2001a) and in water well / groundwater investigations performed by Hydroscience Engineers (HSE, 2001b) and Focus Engineering & Surveying (Focus, 2002) (**Appendix B**). Water service for the Preferred Alternative would be obtained through the use of existing on-site wells or the construction of a new on-site well along with a water storage tank and associated pipelines. Should a new well be constructed, **Figure 2-3** displays the proposed location of the well and supporting facilities.

### 2.1.4 WASTEWATER SERVICE

Wastewater service options are described in detail in the *Gun Lake Gaming Facility Water and Wastewater Feasibility Study* (**Appendix B**) (HSE 2001a). Wastewater service for the Preferred Alternative would be provided through the construction and operation of an on-site wastewater treatment plant. The treatment plant would be constructed on the north-end of the project site, and would produce a high quality effluent (**Figure 2-3**). An earthen berm would be constructed on the north side of the plant to shield the adjacent property from the plant. Effluent from the plant may be discharged on-site to Buskirk Creek. Two options are available for on-site wastewater treatment. One is an aerated pond system. Pond systems are simple to operate and can treat widely varying flows and wastewater loadings, which are typically present from casino wastewater. A second option is a conventional mechanical type plant. The mechanical plant has smaller area requirements than the aerated pond system and better effluent quality. However, a mechanical plant is typically more difficult to operate and consumes more power. Both systems would require ponding and discharge to Buskirk Creek (HSE 2001a).

### 2.1.5 DRAINAGE UPGRADES

Drainage structures would be designed to Allegan County standards (**Appendix E**). The project proposes to detain peak stormwater run-off at the southwest and northeast corners of the site (**Figure 2-5**). In the southwestern corner of the site, an existing topographic depression in a wooded area, north/northwest of the west parking lot would be utilized to ensure no increase in peak flood flows that could otherwise result from increased project site runoff. Stormwater from the west parking lot would discharge into this natural depression. An earthen berm would be constructed around a portion of the wooded area to detain the stormwater and allow it to release at a controlled rate in accordance with Allegan County Drain Commission rules and regulations. In the northeast corner of the site an earthen berm will be constructed

that will detain the stormwater from the north and east parking lots and allow it to release at a controlled rate in accordance with Allegan County Drain Commission rules and regulations. This detention basin will be located north of the north and east parking lots (Nederveld 2001b).

**TABLE 2-1**  
GAMING FACILITY COMPONENTS

<b>Department</b>	<b>Square Feet</b>	<b>Number of Seats</b>	<b>Number of Parking Stalls</b>
<u>Casino</u>			
Gaming Area	97,022	--	--
Poker Room	1,857	--	--
<i>Subtotal</i>	<i>98,879</i>		
<u>Support Spaces</u>			
Casino Support Services	8,677	--	--
Secure Back-of-House	3,786	--	--
Poker Support Spaces	1,088	--	--
Food & Beverage Support	9,293	--	--
<i>Subtotal</i>	<i>22,844</i>		
<u>Food &amp; Beverages</u>			
Casual Dining	10,902	350	--
Buffet	12,980	800	--
Fast Food Outlets	2,118	100	--
Lounges	10,012	800	--
<i>Subtotal</i>	<i>36,012</i>	<i>2,050</i>	
<u>Other</u>			
Public Spaces	5,193	--	--
Retail Spaces & Support	2,241	--	--
Administrative Services	9,934	--	--
Employee Services	4,668	--	--
Building Services	13,653	--	--
<i>Subtotal</i>	<i>35,689</i>		
<b><u>Parking</u></b>			
Car	--	--	3,254
Valet	--	--	212
RV	--	--	26
Bus	--	--	17
<b>GRAND TOTAL</b>	<b>193,424</b>	<b>2,050</b>	<b>3,509</b>

Source: Jeter, Cook & Jepson Architects, Inc., 2001; Nederveld Associates, Inc., 2001.

### 2.1.6 ROADWAY IMPROVEMENTS

Several roadway improvements would be constructed to mitigate traffic impacts from the facility. As currently planned, the proposed site will have three access points on 129<sup>th</sup> Avenue:

- A west driveway 1080 feet east of the northbound US-131 ramps;
- A main driveway 615 feet east of the west driveway; and

Insert Figure 2-1, Location Map

Insert Figure 2-2, Conceptual Site Layout

Insert Figure 2-3, Site Plan

Insert Figure 2-4, Architectural Rendition of Casino

Insert Figure 2-5, Site Drainage Features

- An east driveway 455 feet east of the main driveway.

In order to comply with Michigan Department of Transportation (MDOT) guidelines and recommendations, a bi-directional continuous center turn lane will be constructed on 129<sup>th</sup> Avenue for traffic turning into each of the three above-mentioned driveways. Also in order to comply with MDOT guidelines and recommendations, right-turn tapers will be constructed on northbound 129<sup>th</sup> Avenue for improved access to each casino driveway. Neither the right-turn tapers nor the left-turn lanes are required strictly to increase the roadway capacity to handle the casino-generated traffic. However, the high speed of 129<sup>th</sup> Avenue and the proximity to the US-131 interchange makes it important to improve 129<sup>th</sup> Avenue adjacent to the casino to enhance safety (URS, 2001). Finally, per MDOT's recommendation, at the northbound US-131 ramps, a northbound-to-eastbound right-turn lane and a westbound-to-northbound right-turn lane will be constructed to facilitate casino-generated traffic (**Appendix F**). The improvements to 129<sup>th</sup> Avenue are shown in **Figure 2-6**.

### **2.1.7 APPROVAL OF MANAGEMENT CONTRACT**

The Tribe is negotiating a management contract with MPM Enterprises for management of the casino. When finalized, this contract will be submitted to the NIGC for approval pursuant to the Indian Gaming Regulatory Act, 25 U.S.C. 2711.

## **2.2 OTHER ALTERNATIVES**

### **2.2.1 NO-ACTION ALTERNATIVE**

Under the No-Action Alternative, the 146-acre site would not be placed in trust for the benefit of the Gun Lake Tribe and would not be developed as a gaming facility. A portion of the site could be used for agricultural purposes. The site could also be developed consistent with Wayland Township zoning (Light Industrial) by a private party, or by the Tribe. For the purposes of the environmental analysis in this EA, it is assumed that the portion of the site with existing buildings will be developed for light industrial use under the No-Action Alternative. These buildings have been used in the past by Ampro Industries to manufacture lawn products such as mulch and hydroseed mix. The buildings could potentially be used for this purpose or another light industrial use. The remainder of the site will either be developed to support the light industrial operations or remain in open space.

### **2.2.2 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION**

#### ***OFF-SITE ALTERNATIVES***

In the process of selecting the 146-acre site, the Gun Lake Tribe evaluated several other potential sites throughout Allegan County. The sites have not been pursued because of the combination of the following reasons:

- 1) Lack of water and sewer infrastructure
- 2) Inconsistency with Township zoning
- 3) Incompatibility with adjacent land uses
- 4) Lack of adequate roadway access, or potential for traffic disruption to adjacent areas
- 5) Environmental effects

Of the potential sites for development, the Tribe identified three sites for in-depth examination and consideration (**Figure 2-7**). These sites appeared to have the potential to meet the Tribe's purpose and need. However, after more thorough analysis, including conducting Phase I site assessments and evaluating development compatibility with surrounding uses, these alternatives were eliminated from further consideration and analysis.

The first site selected for more thorough examination is 108 acres (site 1 in **Figure 2-7**). It is located in Dorr Township. It is bordered on the east by 12<sup>th</sup> Street, on the west by US-131, on north by the Jablonski property, and on the south by 142<sup>nd</sup> Avenue. The Tribe rejected this site, in part because of concerns regarding environmental effects. The site is located near local schools. The second potential gaming site is located in Dorr Township (site 2 in **Figure 2-7**). It is triangular in shape and consisted of 242 acres, located just south of the above parcel. It is bordered on the east by US-131, on the south by 140<sup>th</sup> Avenue, and on the west by the Potter Bros. and Damstra properties. It was also rejected by the Tribe because of environmental concerns. The Tribe also did not consider development at this site to be financially feasible. The third site is located in Hopkins Township, just to the west of US-131 (site 3 in **Figure 2-7**). The 129-acre site is bisected by 132<sup>nd</sup> Avenue. The Tribe rejected this site in part because it lacks water or sewer infrastructure. In addition, the site is irregularly shaped and is only served by an unpaved road.

#### ***REDESIGN ALTERNATIVE***

The proposed gaming facility has been designed to minimize impacts to the environment. For instance, existing buildings are proposed to be renovated for use as a casino, minimizing construction related impacts. Also, the parking facilities have been designed to prevent impacts to wetlands or other waters of the U.S. A redesign alternative, which would consist of an alternative arrangement of facilities on the site, would not significantly reduce environmental impacts, and the alternative has therefore been eliminated from further consideration.

Insert Figure 2-6, Proposed Roadway Improvements

Insert Figure 2-7, Project Alternatives Location Map